

PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT

for

KEURBOOMS LIFESTYLE VILLAGE

on

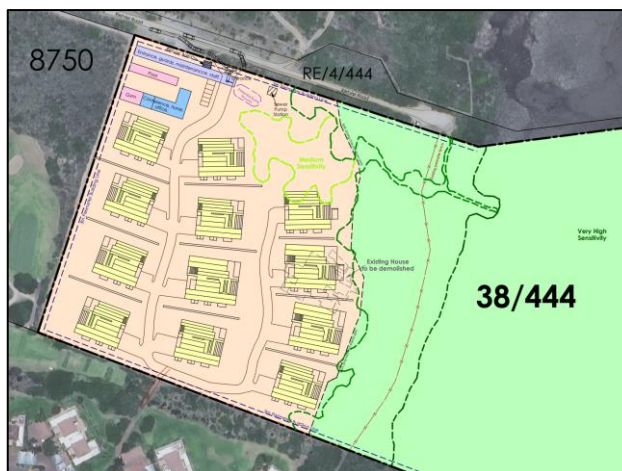
PORTION 38 OF FARM GANSE VALLEI 444,
PLETTENBERG BAY

In terms of the

National Environmental Management Act (Act No. 107
of 1998, as amended) & 2014 Environmental Impact
Regulations

Prepared for Applicant: Intergreen (Pty) Ltd

Date: 23 February 2024



Candidate EAP: Mr Francois Byleveld (EAPASA Reg 2023/6770)

Primary EAP: Ms Louise-Mari van Zyl (EAPASA Reg 2019/1444)

Candidate EAP Email: francois@cape-eaprac.co.za

Primary EAP Email: louise@cape-eaprac.co.za

Report Reference: BIT729/06

Department Reference: 16/3/3/6/7/1/D1/6/0121/22

Case Officer: Jessica Christie

Cape EAPrac

Cape Environmental Assessment Practitioners

Tel: +27 44 874 0365

PO Box 2070, George 6530

Fax: +27 44 874 0432

17 Progress Street, George

www.cape-eaprac.co.za



APPOINTED ENVIRONMENTAL ASSESSMENT PRACTITIONER:

Cape EAPrac Environmental Assessment Practitioners

PO Box 2070

George

6530

Tel: 044-874 0365

Fax: 044-874 0432

Candidate EAP: Mr **Francois Byleveld** (MSc Geology [University of the Free State]) (Candidate EAPASA Registration Number: **2023/6770**) under supervision of the Primary EAP.

Primary EAP: Ms **Louise-Mari van Zyl** (MA Geography & Environmental Science [US]; EAPSA, Registration Number **2019/1444**. Ms van Zyl has over twenty years' experience as an environmental practitioner.

PURPOSE OF THIS REPORT:

Pre-Application Draft Basic Assessment Report

APPLICANT:

Intergreen (Pty) Ltd

CAPE EAPRAC REFERENCE NO:

BIT729/06

SUBMISSION DATE

23 February 2024

PUBLIC PARTICIPATION


By participating in this environmental process, whether it be through written submissions, telephonic enquiries, registrations or attendance of meetings, you are automatically giving consent for your full contact details and/or any submissions/inputs to be used and published in all matters pertaining to this application i.e. reports/notifications/communication for review or decision-making.

DOCUMENT TRACKING

DOCUMENT HISTORY

DOC REF	REVISION	DATE	AUTHOR
BIT729/06	Pre-Application Draft Basic Assessment Report (Version 1)	2024-02-23	Mr Francois Byleveld (Candidate EAP 2023/6770)

APPROVAL FOR RELEASE

NAME	TITLE	SIGNATURE
Mrs Louise-Mari van Zyl (Primary EAP 2019/1444)	Mrs	

DISTRIBUTION

DESIGNATION	NAME	EMAIL / FAX
Potential Stakeholders	Stakeholder Register	Preferred Communication
Bitou Municipal Office	Mr Chris Schliemann	Electronic submission
DEADP, George	Jessica Christie	Electronic submission

PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT

in terms of the
National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended &
Environmental Impact Regulations 2014

KEURBOOMS LIFESTYLE VILLAGE

PORTION 38 OF FARM GANSE VALLEI 444, PLETTENBERG BAY

Submitted for:

Stakeholder Review & Comment

- This report is the property of the Author/Company, who may publish it, in whole, provided that:
- Written approval is obtained from the Author and that *Cape EAPrac* is acknowledged in the publication;
- *Cape EAPrac* is indemnified against any claim for damages that may result from any publication of specifications, recommendations or statements that is not administered or controlled by *Cape EAPrac*;
- The contents of this report, including specialist/consultant reports, may not be used for purposes of sale or publicity or advertisement without the prior written approval of *Cape EAPrac*;
- *Cape EAPrac* accepts no responsibility by the Applicant/Client for failure to follow or comply with the recommended programme, specifications or recommendations contained in this report;
- *Cape EAPrac* accepts no responsibility for deviation or non-compliance of any specifications or recommendations made by specialists or consultants whose input/reports are used to inform this report; and
- All figures, plates and diagrams are copyrighted and may not be reproduced by any means, in any form, in part or whole without prior written approved from *Cape EAPrac*.

Report Issued by:

Cape Environmental Assessment Practitioners

Tel: 044 874 0365

Fax: 044 874 0432

Web: www.cape-eaprac.co.za

PO Box 2070
17 Progress Street
George 6530

ORDER OF REPORT

Basic Assessment Report

- Appendix A : Maps
- Appendix A1 : Locality Map
 - Appendix A2 : Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning
 - ~~Appendix A3 : Map with the GPS co-ordinates for linear activities~~
- Appendix B : Site Plans
- Appendix B1 : Site development plan(s)
 - ~~Appendix B2 : A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas~~
- Appendix C : Photographs
- Appendix D : Biodiversity overlay map
- Appendix E : ~~Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.~~
- Appendix E1 : Final comment/ROD from HWC
 - ~~Appendix E2 : Copy of comment from Cape Nature~~
 - ~~Appendix E3 : Final Comment from the DWS~~
 - ~~Appendix E4 : Comment from the DEA: Oceans and Coast~~
 - ~~Appendix E5 : Comment from the DAFF~~
 - ~~Appendix E6 : Comment from WCG: Transport and Public Works~~
 - Appendix E7 : Comment from WCG: DoA
 - ~~Appendix E8 : Comment from WCG: DHS~~
 - ~~Appendix E9 : Comment from WCG: DoH~~
 - ~~Appendix E10 : Comment from DEA&DP: Pollution Management~~
 - ~~Appendix E11 : Comment from DEA&DP: Waste Management~~
 - ~~Appendix E12 : Comment from DEA&DP: Biodiversity~~
 - ~~Appendix E13 : Comment from DEA&DP: Air Quality~~
 - ~~Appendix E14 : Comment from DEA&DP: Coastal Management~~

Appendix E15	÷	Comment from the local authority
Appendix E16	÷	Confirmation of all services (water, electricity, sewage, solid waste management)
Appendix E17	÷	Comment from the District Municipality
Appendix E18	÷	Copy of an exemption notice
Appendix E19	÷	Pre-approval for the reclamation of land
Appendix E20	÷	Proof of agreement/TOR of the specialist studies conducted.
Appendix E21	:	Zoning Map
Appendix E22	÷	Proof of public participation agreement for linear activities
Appendix F	:	Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.
Appendix F1	:	Registered I&AP List
Appendix F2	:	Adverts & Site Notices
Appendix F3	:	Stakeholder Notification
Appendix F4	÷	Stakeholder Comment
Appendix F5	÷	Comments & Responses Report
Appendix G	:	Specialist Report(s)
Appendix G1	:	Aquatic Compliance Statement
Appendix G2	:	Terrestrial Biodiversity Impact Assessment
Appendix G3	:	Botanical Compliance Statement
Appendix G4	:	Faunal Compliance Statement
Appendix G5	:	Heritage Impact Assessment
Appendix G6	:	Specialist Planning Report
Appendix G7	:	Engineering Services Report
Appendix G8	:	Traffic Impact Assessment
Appendix H	:	Draft EMPr
Appendix I	:	Screening tool report
Appendix J	÷	The impact and risk assessment for each alternative
Appendix K	÷	Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline
Appendix L	÷	Subdivision of Agricultural Land Act, 1970 (Act 70 of 1970) Confirmation of Designation of Portion 38 of Farm Ganse Vallei

TABLE OF CONTENTS

1. CONTENT OF BASIC ASSESSMENT REPORTS	1
SECTION A: ADMINISTRATIVE DETAILS.....	19
SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS AS INLCUED IN THE APPLICATION FORM.....	21
SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS .28	
1. EXEMPTION APPLIED FOR IN TERMS OF THE NEMA AND THE NEMA EIA REGULATIONS.....	28
2. IS THE FOLLOWING LEGISLATION APPLICABLE TO THE PROPOSED ACTIVITY OR DEVELOPMENT	28
3. OTHER LEGISLATION.....	28
4. POLICIES	28
5. GUIDELINES	30
6. PROTOCOLS	31
SECTION D: APPLICABLE LISTED ACTIVITIES	34
SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY	37
SECTION F: PUBLIC PARTICIPATION	48
SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT	50
1. GROUNDWATER.....	50
2. SURFACE WATER.....	51
3. COASTAL ENVIRONMENT	52
4. BIODIVERSITY.....	54
5. GEOGRAPHICAL ASPECTS	59
6. HERITAGE RESOURCES	59
7. HISTORICAL AND CULTURAL ASPECTS.....	60
8. SOCIO/ECONOMIC ASPECTS	60
SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES 61	
1. DETAILS OF THE ALTERNATIVES IDENTIFIED AND CONSIDERED	61
2. “NO-GO” AREAS.....	68

3. METHODOLOGY TO DETERMINE THE SIGNIFICANCE RATINGS OF THE POTENTIAL ENVIRONMENTAL IMPACTS AND RISKS ASSOCIATED WITH THE ALTERNATIVES.....69

4. ASSESSMENT OF EACH IMPACT AND RISK IDENTIFIED FOR EACH ALTERNATIVE.....72

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES 77

SECTION J: GENERAL.....81

1. ENVIRONMENTAL IMPACT STATEMENT.....81

2. RECOMMENDATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (“EAP”).....82

3. WATER.....84

4. WASTE.....84

5. ENERGY EFFICIENCY.....84

SECTION K: DECLARATIONS85

1. DECLARATION OF THE APPLICANT85

2. DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (“EAP”)86

~~3. DECLARATION OF THE REVIEW EAP87~~

4. DECLARATION OF THE SPECIALIST88

~~5. DECLARATION OF THE REVIEW SPECIALIST89~~

LIST OF FIGURES

Figure 1: Locality map of Portion 38 of Farm Ganse Vallei 444 (CapeFarmMapper, 2023).	7
Figure 2: Zoning map of Portion 38 of Farm Ganse Vallei 444 (BitouMunicipalityPublicGISViewer, 2023).	7
Figure 3: Minimum items required to accommodate the proposed development in the existing Plettenberg Bay sewer system. The GLS report worked on the original 17 unit proposal which has since been reduced following the outcome of the environmental process (GLS Consulting, 2022).	8
Figure 4: N2 road reserve (left) and Rietvlei Road road reserve (right). Required sewage infrastructure to be installed within the transformed areas of the road reserve.	8
Figure 5: Minimum required upgrade to the existing 75mm diameter pipeline within the Rietvlei Road road reserve to comply with the fire flow criteria. Note that the original 17 unit proposal considered by GLS has since been reduced to 12 units (GLS Consulting, 2022).	9
Figure 6: Minimum required upgrades to free up an additional 860kl/day from the Goose Valley Reservoir and to accommodate the proposed development on Portion 38 of Farm Ganse Vallei 444 (GLS Consulting, 2022).	10
Figure 7: Preferred pipeline route from Goose Valley Reservoir to existing distribution main in N2 road reserve.	11
Figure 8: Preferred pipeline route from Goose Valley Reservoir to existing distribution main in N2 road reserve.	12
Figure 9: Extract from Bitou Spatial Development Framework (2021).	40
Figure 10: CBA and ESA map of proposed development site (CapeFarmMapper, 2023).	42
Figure 11: Coastal Protection Zone and Coastal Management Line in reference to Portion 38 of Farm Ganse Vallei 444.	43
Figure 12: Delineated estuary with 33m buffer zone.	52
Figure 13: SANBI Red List of Ecosystems map in relation to the proposed development site (CapeFarmMapper, 2023).	57
Figure 14: Protected tree survey (David Hoare Consulting).	58
Figure 15: Site development plan (preferred alternative).	65
Figure 16: Original site development plan.	66
Figure 17: Delineated estuary habitat with 33m buffer zone considered as No-Go areas.	69

1. CONTENT OF BASIC ASSESSMENT REPORTS

Appendix 1 of the 2014 EIA Regulations (as amended) contains the required contents of a Basic Assessment Report. The checklist below serves as a summary of how these requirements were incorporated into this Basic Assessment Report.

Requirement	Details
<p>(a) <i>Details of -</i></p> <p>(i) <i>The EAP who prepared the report; and</i></p> <p>(ii) <i>The expertise of the EAP, including, curriculum vitae.</i></p> <p>(iii) <i>Applicant Details</i></p>	<p>Mr Francois Byleveld (Candidate EAP 2023/6770)</p> <p>Ms Louise-Mari van Zyl (Primary EAP 2019/1444)</p> <p>Refer to main report.</p>
<p>(b) <i>The location of the activity, including –</i></p> <p>(i) <i>The 21 digit Surveyor General code of each cadastral land parcel;</i></p> <p>(ii) <i>Where available, the physical address and farm name;</i></p> <p>(iii) <i>Where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties.</i></p>	<p>Portion 38 of the Farm Ganse Valleï 444</p> <p>C03900000000044400038</p>
<p>(c) <i>a plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale, or, if it is</i></p> <p>(i) <i>A linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or</i></p> <p>(ii) <i>On land where the property has not been defined, the coordinates within which the activity is to be undertaken.</i></p>	<p>Refer to Appendix A1 and B1 for the location and site development plan respectively.</p>
<p>(d) <i>a description of the scope of the proposed activity, including -</i></p> <p>(i) <i>All listed and specified activities triggered and being applied for; and</i></p> <p>(ii) <i>A description of the activities to be undertaken including associated structures and infrastructure.</i></p>	<p>Refer to main report</p>
<p>(e) <i>A description of the policy and legislative context within which the development is proposed, including –</i></p> <p>(i) <i>An identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks, and instruments that are applicable to this activity and have been considered in the preparation of the report; and</i></p> <p>(ii) <i>How the proposed activity complies with and responds to the legislation and policy context,</i></p>	<p>Refer to main report</p>

Requirement	Details
<i>plans, guidelines, tools frameworks and instruments.</i>	
<i>(f) A motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred location.</i>	Refer to main report
<i>(g) A motivation for the preferred site, activity and technology alternative.</i>	Refer to main report
<p><i>(h) A full description of the process followed to reach the proposed preferred alternative within the site, including -</i></p> <ul style="list-style-type: none"> <i>(i) Details of all alternatives considered;</i> <i>(ii) Details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;</i> <i>(iii) A summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;</i> <i>(iv) The environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</i> <i>(v) The impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts: <ul style="list-style-type: none"> <i>(aa) can be reversed;</i> <i>(bb) may cause irreplaceable loss of resources; and</i> <i>(cc) can be avoided, managed or mitigated.</i> </i> <i>(vi) The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;</i> <i>(vii) Positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</i> <i>(viii) The possible mitigation measures that could be applied and level of residual risk;</i> <i>(ix) The outcome of the site selection matrix;</i> <i>(x) If no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and</i> <i>(xi) A concluding statement indicating the preferred alternatives, including preferred location of the activity.</i> 	Refer to main report
<i>(i) A full description of the process undertaken to identify, assess and rank the impacts the</i>	Refer to main report

Requirement	Details
<p><i>activity will impose on the preferred location through the life of the activity, including –</i></p> <ul style="list-style-type: none"> <i>(ii) A description of all environmental issues and risks that were identified during the environmental impact assessment process; and</i> <i>(iii) An assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures.</i> 	
<p><i>(j) An assessment of each identified potentially significant impact and risk, including -</i></p> <ul style="list-style-type: none"> <i>(i) Cumulative impacts;</i> <i>(ii) The nature, significance and consequences of the impact and risk;</i> <i>(iii) The extent and duration of the impact and risk;</i> <i>(iv) The probability of the impact and risk occurring;</i> <i>(v) The degree to which the impact and risk can be reversed;</i> <i>(vi) The degree to which the impact and risk may cause irreplaceable loss of resources; and</i> <i>(vii) The degree to which the impact and risk can be mitigated.</i> 	Refer to main report
<p><i>(k) Where applicable, a summary of the findings and impact management measures identified in any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final assessment report.</i></p>	Refer to main report
<p><i>(l) An environmental impact statement which contains:</i></p> <ul style="list-style-type: none"> <i>(i) A summary of the key findings of the environmental impact assessment;</i> <i>(ii) A map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and</i> <i>(iii) A summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.</i> 	Refer to main report
<p><i>(m) Based on the assessment, and where applicable, impact management measures from specialist reports, the recording of proposed impact management objectives, and the impact management outcomes for the development for inclusion in the EMPr.</i></p>	Refer to main report and Appendix H for EMPr
<p><i>(n) Any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation.</i></p>	Refer to main report
<p><i>(o) A description of assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed.</i></p>	Refer to main report

Requirement	Details
<i>(p) A reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation.</i>	Refer to main report
<i>(q) Where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required, the date on which the activity will be concluded and the post construction monitoring requirements finalised.</i>	Refer to main report
<i>(r) An undertaking under oath or affirmation by the EAP in relation to:</i> <i>(i) The correctness of the information provided in the reports;</i> <i>(ii) The inclusion of comments and inputs from stakeholders and I&APs;</i> <i>(iii) The inclusion of inputs and recommendations from the specialist reports where relevant; and</i> <i>(iv) Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties.</i>	Refer to main report
<i>(s) Where applicable, details of any financial provisions for the rehabilitation, closure and ongoing post decommissioning management of negative environmental impacts.</i>	Not applicable to this application
<i>(t) Any specific information that may be required by the competent authority.</i>	Not applicable to this application
<i>(u) Any other matters required in terms of section 24(4)(a) and (b) of the Act.</i>	Not applicable to this application



FORM NO. BAR10/2019

PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT

**THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND
THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.**

NOVEMBER 2019

(For official use only)	
Pre-application Reference Number (if applicable):	
EIA Application Reference Number:	
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

GENERAL PROJECT DESCRIPTION

Intergreen (Pty) Ltd, hereafter referred to as the Applicant, proposes to develop a low density residential estate, with private amenities, on Portion 38 of Farm Ganse Vallei 444 (8.58ha), Plettenberg Bay (Bitou Municipality, Western Cape Province). The development allows for private, in-house care and support should ill/elderly residents require such services.

The property is situated east of the N2 national road and is bordered by the Goose Valley Golf Estate (west/south), Keurbooms Estuary (east) and the Meadows Residential Estate (north-west), as well as private residential development directly north of the site.

A large single residential dwelling with landscaped gardens surrounding the structure overlooking the estuary exist on the property. There are also existing stables and paddocks in the south-western corner of the property that is significantly more transformed. The property was historically used for keeping horses and grazing activities (Figure 1).

Portion 38 of Farm Ganse Vallei 444 is currently zoned Agriculture Zone I and it is the intention of the applicant to subdivide the property into two (2) portions and rezone these portion to:

- **Residential Zone II** portion (3.17ha equating to 36% of the site) and
- **Open Space Zone III** portion (5.41ha equating to 64% of the site) (Figure 2).

The proposed development within the **Residential Zone II portion** will entail the following infrastructure:

- **Twelve (12) x sectional title group housing units** (single storey), each with a double garage and two (2) additional parking bays. Each unit will cover ~655m² and will therefore calculate to **1.39 units per hectare** over the entire site.
- Entrance gate (from Rietvlei Road).
- Guard house.
- Maintenance and staff rooms.
- Communal areas (clubhouse, conference room, gym, pool, doctor/nurse office and admin office).
- Six (6) x visitor parking bays at the communal buildings / facilities.
- Internal access roads (5.5m wide).
- External services (water line and sewer line within road reserves as part of Municipal infrastructure).

Importantly no formal development is proposed in the Open Space Zone III portion (~5.41ha) although existing pedestrian trails will be maintained.

Vehicular access to the proposed development will be directly from Rietvlei Road (Minor Road 7214) within a 9.45m wide right of way servitude (Portion 4 of Farm 444) along the northern boundary of Portion 38 of Farm Ganse Vallei 444. The Rietvlei Road connects directly with the N2 National Road and is an existing tar road. At the bottom of Rietvlei Road there is an existing public parking area from where the general public can access the estuary.

The proposed development will be a sectional title development (no subdivision), and therefore all the outdoor spaces are considered communal open space that must be maintained by the development (Applicant/Managing Agent/Body Corporate) in perpetuity. Given that a large portion (~5.41 ha) of the property will be zoned private 'Open Space Zone III' within other internal recreational open space areas limited within the proposed Residential Zone II portion on the top flat portion of the site.

The proposed units have been specifically positioned within the transformed, flat portion of the site which avoids higher sensitive areas identified by the independent biodiversity/botanical/faunal/aquatic specialist studies.

All existing buildings/structures which do not form part of the newly proposed development (paddocks, entrance gate, dwelling) will be demolished.



Figure 1: Locality map of Portion 38 of Farm Ganse Vallei 444 (CapeFarmMapper, 2023).

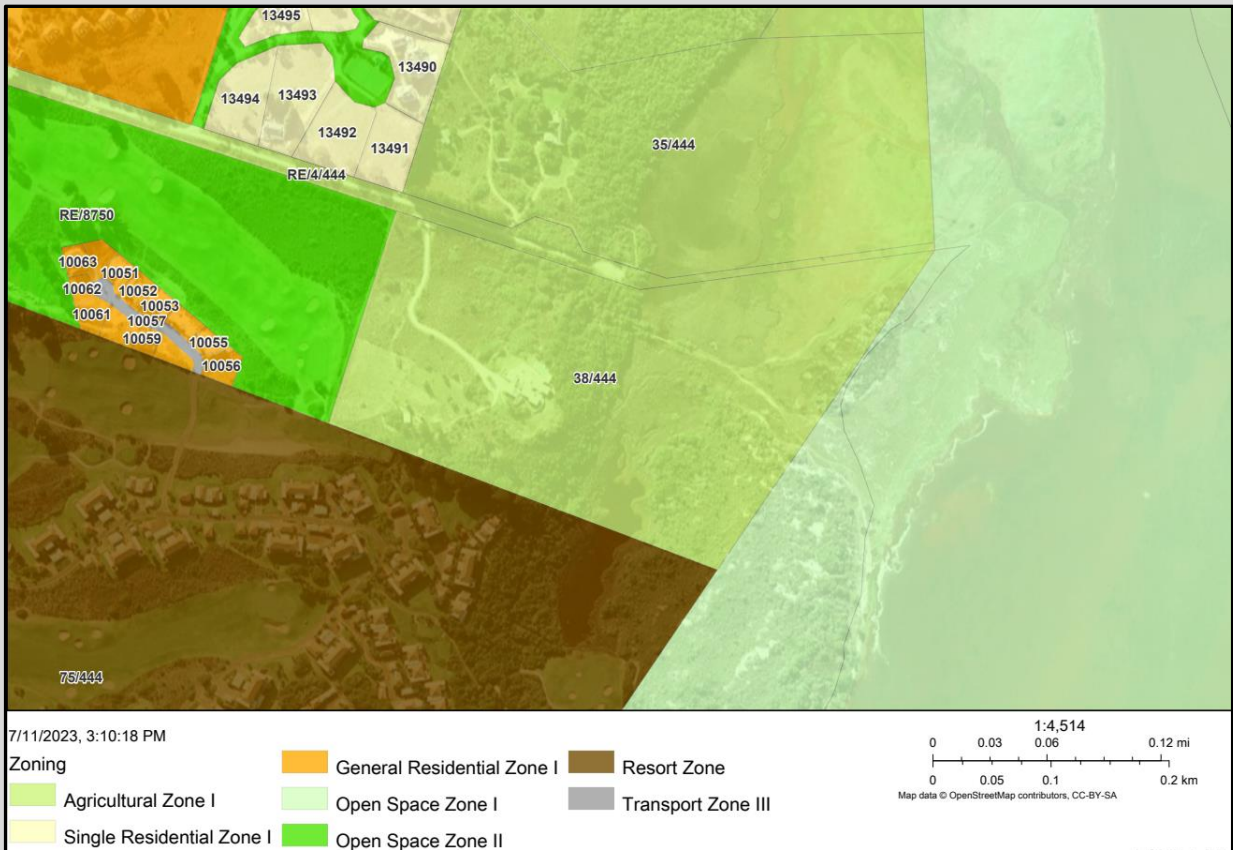


Figure 2: Zoning map of Portion 38 of Farm Ganse Vallei 444 (BitouMunicipalityPublicGISViewer, 2023).

Sewage Network: The proposed development will be accommodated within the existing Goose Valley Main pumping station drainage area. The existing Goose Valley Main pumping station with an accompanying 200mm diameter rising main have sufficient capacity to accommodate the proposed development on Portion 38 of Farm Ganse Vallei 444.

Based on the outcome of the GLS (municipal) services evaluation for this application, the following additional infrastructure will be required to connect the proposed development to the existing municipal sewer system (Figure 3):

- Private pump station on Portion 38 of Farm Ganse Vallei (Item 4 in Figure 3). The location of the proposed pump station is indicated on the Site Development Plan (Appendix B1).
- Rising main (75mm diameter, approximately 470m long) in the Rietvlei Road road reserve (Item 5 in Figure 3).
- Outfall sewer (160mm diameter, approximately 120m long) in the Rietvlei Road road reserve and N2 road reserve (Item 6 in Figure 3).
- Outfall sewer (250mm diameter, approximately 445m long) in the N2 road reserve (Item 7 in Figure 3) where it will connect to the existing Goose Valley main pump station.

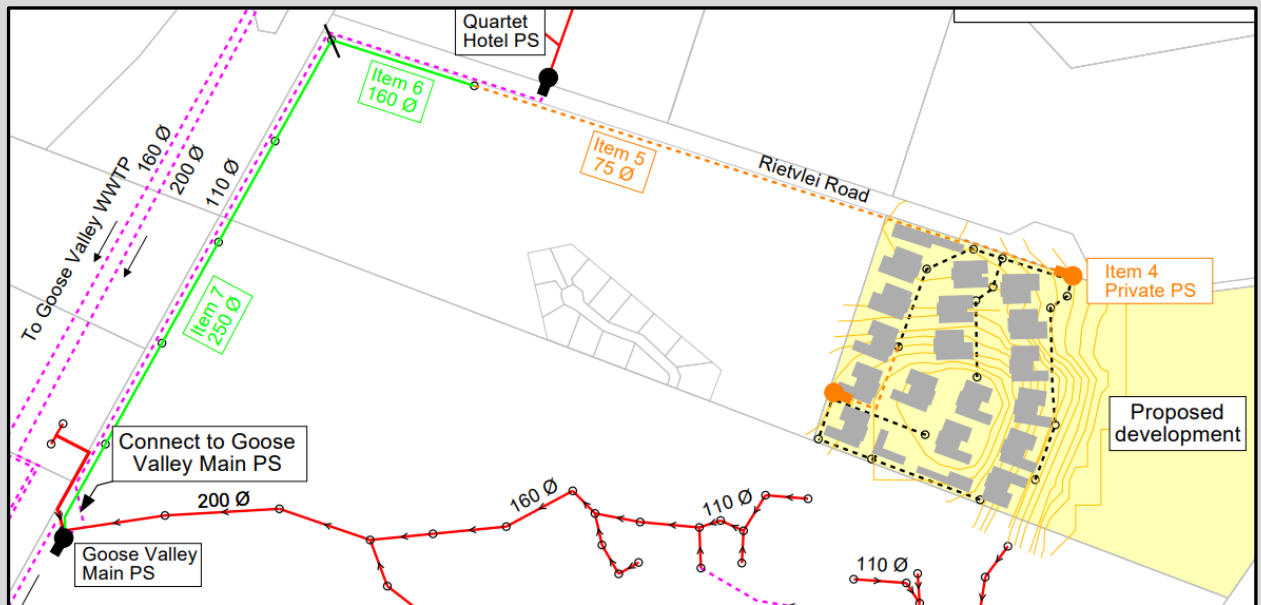


Figure 3: Minimum items required to accommodate the proposed development in the existing Plettenberg Bay sewer system. The GLS report worked on the original 17 unit proposal which has since been reduced following the outcome of the environmental process (GLS Consulting, 2022).



Figure 4: N2 road reserve (left) and Rietvlei Road road reserve (right). Required sewage infrastructure to be installed within the transformed areas of the road reserve.

The proposed internal sewage network (160mm diameter uPVC gravity pipe network with round precast concrete ring manholes) will drain towards the proposed private sewer pumpstation on the northern boundary of the property.

Water Network: The proposed development will be accommodated in the Goose Valley reservoir zone. Water reticulation will be connected to an existing 75mm diameter pipe located north-west of the property in Rietvlei Road road reserve.

According to the GLS (municipal) services investigation, the 75mm diameter pipe in Rietvlei Road road reserve will be upgraded to a 110mm diameter pipe (extending approximately 220m long) in the Rietvlei Road reserve in order to comply with the fire flow criteria (Item 1 in Figure 5).

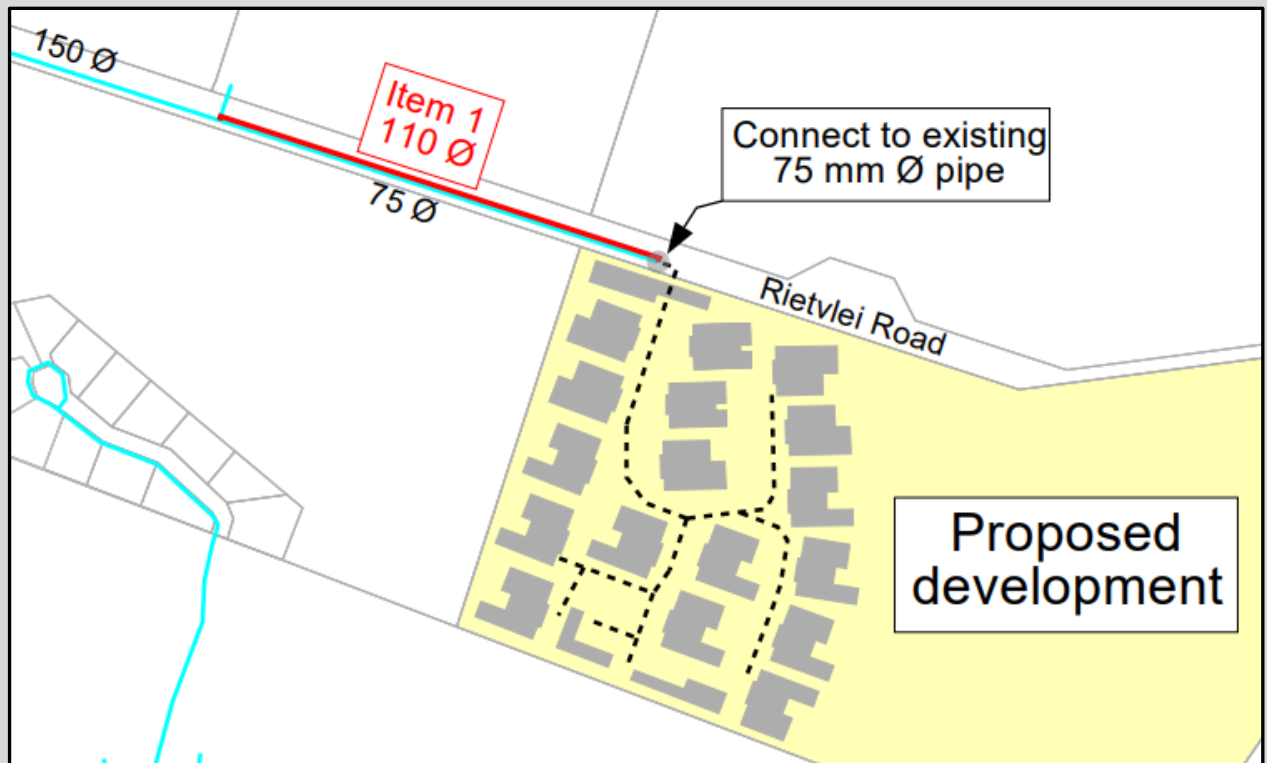


Figure 5: Minimum required upgrade to the existing 75mm diameter pipeline within the Rietvlei Road road reserve to comply with the fire flow criteria. Note that the original 17 unit proposal considered by GLS has since been reduced to 12 units (GLS Consulting, 2022).

The internal water reticulation system will be a metered network consisting of a combined domestic and fire water reticulation network (75mm diameter uPVC Class 12 potable water main). Provision will be made inside erf boundaries of every property for individual water meters (located 1m inside each erf boundary).

The Civil Engineering Report compiled by Vita Consulting Engineers (October 2023) comment on the following additional requirement:

The bulk water system to the Goose Valley, Wittedrift and Matjiesfontein reservoirs is at capacity and should be upgraded according to the master plan before additional developments within the reservoir supply areas can be accommodated.

GLS Consulting provided the following temporary solution:

- A new link 160mm water line off the existing 160mm distribution main in the N2 road reserve to the existing municipal reservoir which will free up an additional 860kl/day.
- The additional 860kl/day will create capacity to accommodate developments on **Farm 444/38 (the study site)**, as well as Farm 304/32 and Erf 6503.

The civil engineer consulted with the Bitou Municipality 9 March 2023, who stated that they accept and support these measures put forward by GLS, on the following conditions:

- Final design, installation, etc. costs for the infrastructure will be the responsibility of the developer/developers and will not be deductible from the Augmentation Levee's.
- The infrastructure (specifically the water line) is not intended to be a permanent solution and Augmentation Levee's for Water and Sewage will be used towards the permanent solution which the Bitou Municipality may in future apply for.
- The proposed pro-rata contribution towards the temporary infrastructure must be resolved between the developers of the different properties as part of the Service Level Agreement.
- A Service Level Agreement must be drafted for the development.

At the time of the civil investigation, the implementation of the water line was to be undertaken by the developer of Portion 19 and 27 of Farm 444, as this development will be the first to have a civil contractor on site.

The requirement is for any pro-rata contributions (Farm 444/38, Farm 304/32 and Erf 6503) for the installation of the pipe will be paid directly to the developer of Portion 19 and 27 of Farm 444.

In the event the owner of Portion 19/27 of Farm 444 is unable to implement the waterline, the responsibility for installation of the section of water pipeline, will fall to the developers of either Farm 38/444, Farm 304/32 or Erf 6503. For this reason, the preferred route for the waterline has been considered as part of this application.

It is confirmed that should the waterline be installed above-ground i.e. laid on the surface and covered with rocks, it will follow the existing access road from the N2 up to the existing Municipal reservoir. This option will not result in the removal of any vegetation.

The alternative which is not preferred, is for the new line to be installed along the existing Municipal services servitude from the reservoir, however that will require the removal of vegetation along a steep slope, for which the Municipality will have to obtain prior Environmental Authorisation.

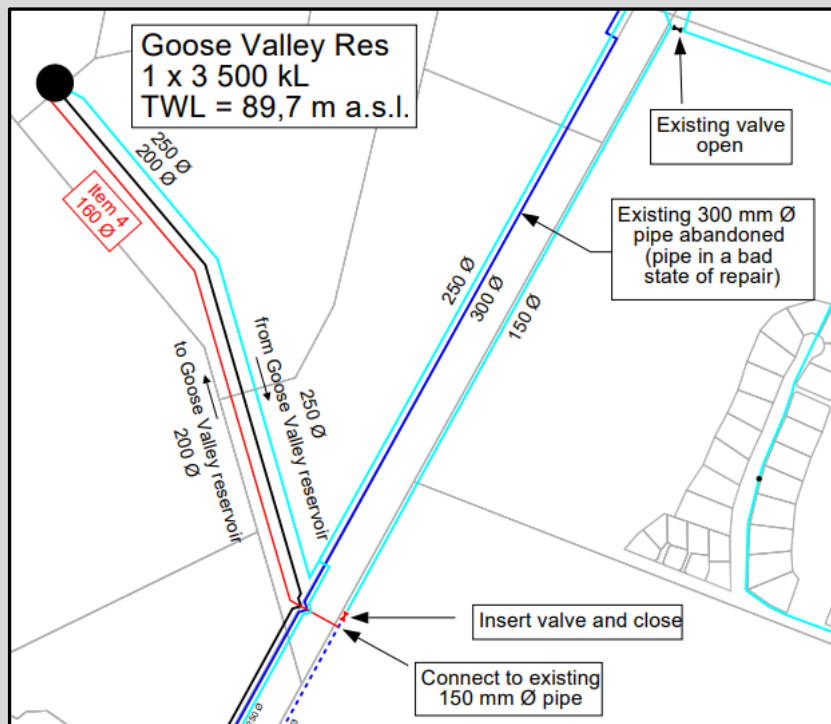


Figure 6: Minimum required upgrades to free up an additional 860kl/day from the Goose Valley Reservoir and to accommodate the proposed development on Portion 38 of Farm Ganse Vallei 444 (GLS Consulting, 2022).

Preferred route for required pipeline to Goose Valley Reservoir:

The preferred route for the new section of 160mm bulk water line off the existing 160mm distribution main in the N2 road reserve, follows the existing gravel road traversing Portion 72 of Farm 444 and Portion 74 of Farm 444 (Figure 7 and Figure 8) to the reservoir.

The total length of the pipeline following this preferred route is approximately 940m. This route is desirable as it will follow an existing gravel road that is already disturbed and will not result in vegetation removal as it will be laid on the surface.



Figure 7: Preferred pipeline route from Goose Valley Reservoir to existing distribution main in N2 road reserve.





Figure 8: Preferred pipeline route from Goose Valley Reservoir to existing distribution main in N2 road reserve.

Roads and Parking Areas:

The internal road network will be a 5.5m wide brick paved road with formal kerbs/edgings, roadside channels and a stormwater drainage network. Internal roads will not be subdivided and will form part of the communal areas maintained by the Body Corporate of the proposed development.

It is proposed for the gravel parts of Rietvlei Road to be hard surfaced within the constraints of the existing road.

Stormwater:

The pre-development site drains from the central portion (highest point on the property) towards the north-western and southern boundaries. No formal bulk municipal stormwater infrastructure is available in vicinity of the property. Due to the high permeability of the insitu dune sands, stormwater runoff permeates into the subsoil layers and therefore a formalised bulk stormwater connection is not required for the proposed development.

An open swale stormwater network will however be designed which will have sufficient capacity to manage and convey up to a 1:5 year rainfall event. The open swale stormwater network will follow the road network and will have inlet structures and pipe culverts at road crossings. If a rainfall event with a return period larger than 1:5 year occurs, the internal roadways will act as overland flow routes which will convey stormwater run-off towards the lower lying eastern portion of the property.

Provision will be made for a subsoil drainage network beneath the internal roads. The subsoil drainage network will consist of a 110mm diameter perforated pipe network installed 800mm below the final road level.

Due to the poor cohesion of the dune sands, the following erosion preventative measures will be included in the stormwater design:

- Minimize the concentration of stormwater to prevent high flow rates.
- Route run-off from hard surfaces into swales.
- Promote sheet flow into open swales.
- Formalise (armorflex) channels with an internal velocity more than 1m/s.
- Landscape unlined channels with appropriate vegetation.
- Install energy dissipation structures at high energy discharge points.

Solid Waste:

The collection of domestic waste from individual housing units will be administrated by the homeowners association / body corporate of the proposed development. Solid waste will be transferred to a communal refuse storage located at the entrance of the proposed development from where it will be removed as per the Municipal waste collection schedule. Adequate turning space for a standard refuse truck has been incorporated in the proposed entrance design.

IMPORTANT INFORMATION TO BE READ PRIOR TO COMPLETING THIS BASIC ASSESSMENT REPORT

1. **The purpose** of this template is to provide a format for the Basic Assessment report as set out in Appendix 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in order to ultimately obtain Environmental Authorisation.
2. The Environmental Impact Assessment ("EIA") Regulations is defined in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") hereinafter referred to as the "NEMA EIA Regulations".
3. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.
4. All applicable sections of this BAR must be completed.
5. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.
6. This BAR is current as of **November 2019**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at <http://www.westerncape.gov.za/eadp> to check for the latest version of this BAR.
7. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an environmental authorisation in terms of the NEMA EIA Regulations when the Western Cape Government Department of Environmental Affairs and Development Planning ("DEA&DP") is the Competent Authority.
8. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.
9. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.
10. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.
11. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"), the "One Environmental System" is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department's Circular EADP 0028/2014: One Environmental Management System.
12. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA") is triggered, a copy of Heritage Western Cape's final comment must be attached to the BAR.
13. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link <https://screening.environment.gov.za/screeningtool> to generate the Screening Tool Report. The screening tool report must be attached to this BAR.
14. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ("NEM:AQA"), the submission of the Report must also be made as follows, for-

Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

Atmospheric Emissions Licence Applications, this report must also be (i.e., another hard copy and electronic copy) submitted for the attention of the Licensing Authority or this Department's Air Quality Management Directorate (Tel: 021 483 2888 and Fax: 021 483 4368) at the same postal address as the Cape Town Office.

DEPARTMENTAL DETAILS

CAPE TOWN OFFICE: REGION 1 and REGION 2 (Region 1: City of Cape Town, West Coast District) (Region 2: Cape Winelands District & Overberg District)	GEORGE OFFICE: REGION 3 (Central Karoo District & Garden Route District)
<p>BAR must be sent to the following details:</p> <p>Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1 or 2) Private Bag X 9086 Cape Town, 8000</p> <p>Registry Office 1st Floor Utilities Building 1 Dorp Street, Cape Town</p> <p>Queries should be directed to the Directorate: Development Management (Region 1 and 2) at: Tel: (021) 483 5829 Fax (021) 483 4372</p>	<p>BAR must be sent to the following details:</p> <p>Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530</p> <p>Registry Office 4th Floor, York Park Building 93 York Street George</p> <p>Queries should be directed to the Directorate: Development Management (Region 3) at: Tel: (044) 805-8600 Fax (044) 805 8650</p>

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
<p>Locality Map:</p>	<p>The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map.</p> <p>The map must indicate the following:</p> <ul style="list-style-type: none"> • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. <p>For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken.</p> <p>Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.</p>
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	
<p>Site Plan:</p>	<p>Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following:</p> <ul style="list-style-type: none"> • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. • The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. • The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access

	<p>roads that will form part of the proposed development must be clearly indicated on the site plan.</p> <ul style="list-style-type: none"> • Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. • Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): <ul style="list-style-type: none"> ○ Watercourses / Rivers / Wetlands ○ Flood lines (i.e., 1:100 year, 1:50 year and 1:10 year where applicable); ○ Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"); ○ Ridges; ○ Cultural and historical features/landscapes; ○ Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow <p>A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.</p>
Site photographs	<p>Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as Appendix C. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.</p>
Biodiversity Overlay Map:	<p>A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as Appendix D.</p>
Linear activities or development and multiple properties	<p>GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system.</p> <p>Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix.</p> <p>For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as Appendix A3.</p>

ACRONYMS

DAFF:	Department of Forestry and Fisheries
DEA:	Department of Environmental Affairs
DEA& DP:	Department of Environmental Affairs and Development Planning
DHS:	Department of Human Settlement
DoA:	Department of Agriculture
DoH:	Department of Health
DWS:	Department of Water and Sanitation
EMPr:	Environmental Management Programme
HWC:	Heritage Western Cape
NFEPA:	National Freshwater Ecosystem Protection Assessment
NSBA:	National Spatial Biodiversity Assessment
TOR:	Terms of Reference
WCBSP:	Western Cape Biodiversity Spatial Plan
WCG:	Western Cape Government

ATTACHMENTS

Note: The Appendices must be attached to the BAR as per the list below. Please use a ✓ (tick) or a x (cross) to indicate whether the Appendix is attached to the BAR.

The following checklist of attachments must be completed.

APPENDIX			✓ (Tick) or x (Cross)
Appendix A:	Maps		
	Appendix A1:	Locality Map	✓
	Appendix A2:	Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning	✓
	Appendix A3:	Map with the GPS co-ordinates for linear activities	x
Appendix B:	Appendix B1:	Site development plan(s)	✓
	Appendix B2	A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;	x
Appendix C:	Photographs		✓
Appendix D:	Biodiversity overlay map		✓
Appendix E:	Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.		
	Appendix E1:	Final comment/ROD from HWC	✓
	Appendix E2:	Copy of comment from Cape Nature	x
	Appendix E3:	Final Comment from the DWS	x
	Appendix E4:	Comment from the DEA: Oceans and Coast	x
	Appendix E5:	Comment from the DAFF	x
	Appendix E6:	Comment from WCG: Transport and Public Works	x
	Appendix E7:	Comment from WCG: DoA	✓
	Appendix E8:	Comment from WCG: DHS	x
	Appendix E9:	Comment from WCG: DoH	x

	Appendix E10:	Comment from DEA&DP: Pollution Management	X
	Appendix E11:	Comment from DEA&DP: Waste Management	X
	Appendix E12:	Comment from DEA&DP: Biodiversity	X
	Appendix E13:	Comment from DEA&DP: Air Quality	X
	Appendix E14:	Comment from DEA&DP: Coastal Management	X
	Appendix E15:	Comment from the local authority	X
	Appendix E16:	Confirmation of all services (water, electricity, sewage, solid waste management)	X
	Appendix E17:	Comment from the District Municipality	X
	Appendix E18:	Copy of an exemption notice	X
	Appendix E19:	Pre-approval for the reclamation of land	X
	Appendix E20:	Proof of agreement/TOR of the specialist studies conducted.	X
	Appendix E21:	Proof of land use rights	✓
	Appendix E22:	Proof of public participation agreement for linear activities	X
Appendix F:	Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.		✓
Appendix G:	Specialist Report(s)		✓
Appendix H:	Draft EMPr		✓
Appendix I:	Screening tool report		✓
Appendix J:	The impact and risk assessment for each alternative		X
Appendix K:	Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline		X
Appendix L:	Subdivision of Agricultural Land Act, 1970 (Act 70 of 1970) Confirmation of Designation of Portion 38 of Farm Ganse Vallei 444		✓

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE:		GEORGE OFFICE:	
	REGION 1 <small>(City of Cape Town, West Coast District)</small>	REGION 2 <small>(Cape Winelands District & Overberg District)</small>	REGION 3 <small>(Central Karoo District & Garden Route District)</small>	
<p>Duplicate this section where there is more than one Proponent</p> <p>Name of Applicant/Proponent:</p> <p>Name of contact person for Applicant/Proponent (if other):</p> <p>Company/ Trading name/State Department/Organ of State:</p> <p>Company Registration Number:</p> <p>Postal address:</p> <p>Telephone:</p> <p>E-mail:</p>	Intergreen (Pty) Ltd			
	Nils Brink van Zyl			
	Intergreen (Pty) Ltd			
	2002/01332/07			
	PO Box 55265			
	Northlands		Postal code:	2116
			Cell:	083 271 6095
	nils@intergreen.co.za christopher@intergreen.co.za		Fax:	
	Company of EAP: Cape Environmental Assessment Practitioners (<i>Cape EAPrac</i>)			
	Registered EAP name: Ms Louise-Mari van Zyl			
Candidate EAP name: Mr Francois Byleveld				
Postal address: PO Box 2070				
George		Postal code:	6530	
Telephone: 044 874 0365		Cell:	071 603 4132	
Registered EAP E-mail: louise@cape-eaprac.co.za		Fax:		
Candidate EAP E-mail: francois@cape-eaprac.co.za				
Qualifications: Registered EAP: MA Geography & Environmental Science (University Stellenbosch) Candidate EAP: MSc Geology (University of the Free State)				
EAPASA registration no: Mr Francois Byleveld (MSc Geology [University of the Free State]) (Candidate EAPASA Registration Number: 2023/6770) under supervision of the Primary EAP, Ms Louise-Mari van Zyl who is a registered with EAPASA (MA Geography & Environmental Science [US]).				

	Director Louise-Mari van Zyl (MA Geography & Environmental Science [US]; Registered Environmental Assessment Practitioner with the Environmental Assessment Practitioners of South Africa, EAPSA, Registration Number 2019/1444 . Ms van Zyl has over twenty years' experience as an environmental practitioner.		
Duplicate this section where there is more than one landowner Name of landowner: Name of contact person for landowner (if other): Postal address: Telephone: E-mail:	True Motives 99 (Pty) Ltd		
	Nils Brink van Zyl		
	P.O. Box 55265		
	Northlands	Postal code:	2116
		Cell:	083 271 6095
	nils@intergreen.co.za	Fax:	
Name of Person in control of the land: Name of contact person for person in control of the land: Postal address: Telephone: E-mail:	Intergreen (Pty) Ltd (same as applicant)		
		Postal code:	
	()	Cell:	
		Fax:	
Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall: Contact person: Postal address: Telephone: E-mail:	Bitou Municipality		
	Chris Schliemann		
	Pvt Bag 1002		
	Plettenberg Bay	Postal code:	6600
	044 501 3324	Cell:	086 659 7954
	cschliemann@plett.gov.za	Fax:	

SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS AS INLCUDED IN THE APPLICATION FORM

1.	Is the proposed development (please tick):	New	✓	Expansion	
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				
<p>Brownfield site.</p> <p>Portion 38 of Farm Ganse Valleï 444 contains a large single residential dwelling (to be demolished) with extended landscaped/garden areas around the house. Stables and paddocks, as well as existing perimeter fencing and an access road are in place.</p> <p>Existing municipal services and access are already available servicing the primary dwelling. Limited upgrades will be required to allow for servicing of the 12 proposed units.</p> <p>The property has been utilised for grazing, horse paddocks previously and contains natural vegetation in the areas not previously transformed.</p>					
3.	For Linear activities or developments				
3.1.	Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:				
<p><u>Sewage pipelines (proposed extension along Rietvlei Road and N2):</u></p> <p>Rietvlei Road road reserve (Portion 4 of Remainder of Farm 444). Portion 128 of Farm 444 (N2 road reserve). Portion 127 of Farm 444 (N2 road reserve). Portion 126 of Farm 444 (N2 road reserve). Portion 125 of Farm 444 (N2 road reserve).</p> <p><u>Water pipeline upgrade of existing water line in Rietvlei Road road reserve:</u></p> <p>Rietvlei Road road reserve (Portion 4 of Remainder of Farm 444).</p> <p><u>Non-preferred route for new link water pipeline installation to Goose Valley Reservoir:</u></p> <p>Portion 72 of Farm 444. Portion 73 of Farm 444. Portion 122 of Farm 444 (N2 road reserve for connection to the existing municipal water line).</p> <p><u>Preferred route for water link pipeline installation to Goose Valley Reservoir:</u></p> <p>Portion 72 of Farm 444. Portion 74 of Farm 444. Portion 122 of Farm 444 (N2 road reserve for connection to the existing municipal water line).</p>					
3.2.	Development footprint of the proposed development for all alternatives.			—m ²	
3.3.	Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.				
<p><u>Sewage pipelines:</u></p> <p>The following infrastructure will be required to connect the internal sewer system of the proposed development to the existing Municipal sewer system (Figure 3):</p> <ul style="list-style-type: none"> • New private pump station on Portion 38 of Farm Ganse Valleï (Item 4 in Figure 3). The location of the proposed pump station is indicated on the Site Development Plan (Appendix B1). 					

- Rising main (75mm diameter, approximately 470m long) in the Rietvlei Road road reserve (Item 5 in Figure 3).
- Outfall sewer (160mm diameter, approximately 120m long) in the Rietvlei Road road reserve and N2 road reserve (Item 6 in Figure 3).
- Outfall sewer (250mm diameter, approximately 445m long) in the N2 road reserve (Item 7 in Figure 3).

Areas where the line need to be installed are transformed and fall within registered road reserves.

Water pipeline upgrade in Rietvlei Road road reserve:

Replace a portion of the the existing 75mm diameter pipe in Rietvlei Road road reserve with a 110mm diameter pipe (approximately 220m long) in order to comply with the fire flow criteria (Item 1 in Figure 5).

Areas where the line need to be installed are transformed and fall within registered road reserves.

Non-preferred water link pipeline installation at Goose Valley Reservoir:

Installation of 160mm (approximately 460m long) link line off the existing 160mm distribution main in the N2 road reserve up to the existing Goose Valley reservoir. This route will impact on natural vegetation along a steep slope.

Preferred route for water link pipeline installation at Goose Valley Reservoir:

Installation of new 160mm link line off the existing 160mm distribution main in the N2 road reserve to the existing Goose Valley reservoir via the existing gravel road (Figure 7 and Figure 8).

The total length of the pipeline following the alternative route is approximately 940m and the proposal is to install this line on the surface and cover it with rocks for protection. This will have the benefit of not needing to remove natural vegetation along a steep slope.

3.4. Indicate how access to the proposed routes will be obtained for all alternatives.

Access to the proposed pipeline routes will be obtained from the Rietvlei Road as well as the N2 national road via the existing main access route on the property that currently serves the main dwelling.

3.5.	SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives	C	0	3	9	0	0	0	0	0	0	0	0	0	0	4	4	4	0	0	0	0	4
		C	0	3	9	0	0	0	0	0	0	0	0	0	0	4	4	4	0	0	1	2	8
		C	0	3	9	0	0	0	0	0	0	0	0	0	0	4	4	4	0	0	1	2	7
		C	0	3	9	0	0	0	0	0	0	0	0	0	0	4	4	4	0	0	1	2	6
		C	0	3	9	0	0	0	0	0	0	0	0	0	0	4	4	4	0	0	1	2	5
		C	0	3	9	0	0	0	0	0	0	0	0	0	0	4	4	4	0	0	0	7	2
		C	0	3	9	0	0	0	0	0	0	0	0	0	0	4	4	4	0	0	1	2	3
		C	0	3	9	0	0	0	0	0	0	0	0	0	0	4	4	4	0	0	1	2	2
		C	0	3	9	0	0	0	0	0	0	0	0	0	0	4	4	4	0	0	0	7	4

3.6. **Starting point co-ordinates for all alternatives (Sewage Pipelines)**

Latitude (S)	34°	01'	26.69"
Longitude (E)	23°	23'	15.19"
Middle point co-ordinates for all alternatives (Sewage Pipelines)			
Latitude (S)	34°	01'	21.04"

Longitude (E)	23°	22'	54.28"
End point co-ordinates for all alternatives (Sewage Pipelines)			
Latitude (S)	34°	01'	33.92"
Longitude (E)	23°	22'	46.17"
Starting point co-ordinates for all alternatives (Water pipeline upgrades in Rietvlei Road road reserve)			
Latitude (S)	34°	01'	26.08"
Longitude (E)	23°	23'	12.80"
Middle point co-ordinates for all alternatives (Water pipeline upgrades in Rietvlei Road road reserve)			
Latitude (S)	34°	01'	24.88"
Longitude (E)	23°	23'	08.72"
End point co-ordinates for all alternatives (Water pipeline upgrades in Rietvlei Road road reserve)			
Latitude (S)	34°	01'	23.94"
Longitude (E)	23°	23'	04.96"
Starting point co-ordinates for all alternatives (Water pipeline installation at Goose Valley Reservoir)			
Latitude (S)	34°	02'	03.47"
Longitude (E)	23°	22'	25.91"
Middle point co-ordinates for all alternatives (Water pipeline installation at Goose Valley Reservoir)			
Latitude (S)	34°	01'	55.25"
Longitude (E)	23°	22'	22.44"
End point co-ordinates for all alternatives (Water pipeline installation at Goose Valley Reservoir)			
Latitude (S)	34°	01'	49.16"
Longitude (E)	23°	22'	17.07"
Starting point co-ordinates for all alternatives (Preferred Route: Water pipeline installation at Goose Valley Reservoir)			
Latitude (S)	34°	01'	46.72"
Longitude (E)	23°	22'	37.30"

Middle point co-ordinates for all alternatives (Preferred Route: Water pipeline installation at Goose Valley Reservoir)			
Latitude (S)	34°	01'	47.03"
Longitude (E)	23°	22'	24.18"
End point co-ordinates for all alternatives (Preferred Route: Water pipeline installation at Goose Valley Reservoir)			
Latitude (S)	34°	01'	49.16"
Longitude (E)	23°	22'	17.07"
Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.			
4.	Other developments		
4.1.	Property size(s) of all proposed site(s):	8.58ha	
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):		
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:	~3.17ha	
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).		
<p>The applicant proposes to develop a residential lifestyle estate, with private amenities, on Portion 38 of Farm Ganse Vallei 444 (8.58ha), Plettenberg Bay (Bitou Municipality, Western Cape Province). The future residents will have in-house services available for nursing care at home for ill and/or elderly residents.</p> <p>The property is situated east of the N2 national road and is bordered by the Goose Valley Golf Estate (south and west), Keurbooms Estuary (east) and the Meadows Residential Estate (north-west), as well as private residential development directly north of the site. A single residential dwelling with stables and paddocks occupy the property. The property was historically used for grazing activities and horse paddocks (Figure 1).</p> <p>Portion 38 of Farm Ganse Vallei 444 is currently zoned Agriculture Zone I and it is the intention of the applicant to subdivide the property into two (2) portions and to rezone it to a Residential Zone II portion (3.17ha) and Open Space Zone III portion (5.41 ha) (Figure 2).</p> <p>The proposed development within the Residential Zone II portion will entail the following infrastructure:</p> <ul style="list-style-type: none"> • Twelve (12) x sectional title group housing units (single storey), each with a double garage and two (2) additional parking bays. Each unit will cover ~655m² and will therefore calculate to 1.39 units per hectare over the entire site. • Entrance gate (from Rietvlei Road). • Guard house. • Maintenance and staff rooms. • Communal areas (clubhouse, conference room, gym, pool, doctor/nurse office and admin office). • Six (6) x visitor parking bays at the communal buildings / facilities. • Internal access roads (5.5m wide). No development is proposed in the Open Space Zone III portion (~5.41ha) and this area which encompass the Keurbooms Estuary will act as private open space. • Sections of external water link line and sewage line within road reserves of the Rietvlei Road and N2. 			

Access throughout the private open space area will be via existing footpaths from within the site, as well as existing footpaths that traverse the estuary from the public parking area at the bottom of Rietvlei Road.

Access to the proposed development site will be directly from Rietvlei Road (Minor Road 7214) within a 9.45m wide right of way servitude (Portion 4 of Farm 444) along the northern boundary of Portion 38 of Farm Ganse Vallei 444. The Rietvlei Road connects directly with the N2 National Road and is an existing tar road.

The proposed development will be a sectional title development (no subdivision), and therefore all the outdoor spaces are considered communal open space. Given that a large portion (~5.41 ha) of the property will be zoned 'Open Space Zone III', internal open space is limited within the proposed Residential Zone II portion.

The proposed units have been specifically positioned within the transformed, flat portion of the site which avoids higher sensitive areas identified by specialist studies consisting mostly of thicket and estuarine habitat in the private open space III areas.

All existing buildings/structures which do not form part of the newly proposed development (paddocks, entrance gate, dwelling) will be demolished.

Sewage Network: The proposed development will be accommodated within the existing Goose Valley Main pumping station drainage area.

The existing Goose Valley Main pumping station with an accompanying 200mm diameter rising main have sufficient capacity to accommodate the proposed development on Portion 38 of Farm Ganse Vallei 444.

However, the following infrastructure will be required to connect the internal sewer system of the proposed development to the existing Municipal sewer system (Figure 3):

- New private pump station on Portion 38 of Farm Ganse Vallei (Item 4 in Figure 3). The location of the proposed pump station is indicated on the Site Development Plan (Appendix B1).
- Rising main (75mm diameter, approximately 470m long) in the Rietvlei Road road reserve (Item 5 in Figure 3).
- Outfall sewer (160mm diameter, approximately 120m long) in the Rietvlei Road road reserve and N2 road reserve (Item 6 in Figure 3).
- Outfall sewer (250mm diameter, approximately 445m long) in the N2 road reserve (Item 7 in Figure 3).

The proposed internal sewage network (160mm diameter uPVC gravity pipe network with round precast concrete ring manholes) will drain towards the proposed on-site sewer pumpstation on the northern boundary of the property.

Water Network: The proposed development will be accommodated in the Goose Valley reservoir zone. Water reticulation will be connected to an existing 75mm diameter pipe located north-west of the property in Rietvlei Road road reserve. A portion of this line must be replaced with a 110mm pipe, over a distance of approximately 220m in the road reserve, order to comply with the fire flow criteria (Item 1 in Figure 5).

The internal water reticulation system will be a metered network consisting of a combined domestic and fire water reticulation network (75mm diameter uPVC Class 12 potable water main). Provision will be made inside erf boundaries of every property for individual water meters (located 1m inside each erf boundary).

Civil Engineering Report compiled by Vita Consulting Engineers (October 2023) regarding water supply to the proposed development:

The bulk water system to the Goose Valley, Wittedrift and Matjiesfontein reservoirs is at capacity and should be upgraded according to the master plan before additional developments within the reservoir supply areas can be accommodated.

GLS Consulting provided the following temporary solution:

- Installation of an new section of 160mm bulk main, off the existing 160mm distribution main in the N2 road reserve to the existing Goose Valley reservoir, which will free up an additional 860kl/day.
- There is sufficient capacity in the 860kl/day to accommodate the multiple developments in the area of which Portion 38 is one.

The project engineer discussed this proposal with Bitou Municipality on 9 March 2023, who stated that they will accept/support the temporary solution on the following conditions:

- Design, installation, etc. costs for the temporary solution will be the responsibility of the developer/developers and will not be deductible from the Augmentation Levee's.
- The temporary solution is not a permanent solution and Augmentation Levee's for Water and Sewage will be used towards the permanent solution. The Municipality may still apply for a permanent solution in future to which Developers may have to be connected at additional cost.
- The proposed pro-rata contribution towards the section of pipe, must be resolved between the developers of the different properties into their Service Level Agreements.
- A Service Level Agreement must be drafted for the development.

The status quo is that implementation of the proposed water line as per GLS (2022) will be done by the developer of Portion 19 and 27 of Farm 444, as this development will be the first to have a civil contractor on site. The pro-rata contributions from other developers linking to this service (i.e. Farm 444/38, Farm 304/32 and Erf 6503) will be paid directly to the developer of Portion 19 and 27 of Farm 444.

Should the developer of Portion 19/27 not be able to implement in time for the other developers to get water from this link line, the responsibility will fall to whomever implements their project first. For this reason the route for the link line is considered as part of this application.

Preferred route for required water link pipeline upgrades to Goose Valley Reservoir:

The preferred route for the additional 160mm bulk main off the existing 160mm distribution main in the N2 road reserve to the Goose Valley reservoir, is via the existing gravel road traversing Portion 72 of Farm 444 and Portion 74 of Farm 444 (Figure 7 and Figure 8).

The total length of the pipeline following this preferred route is approximately 940m. This preferred route is more desirable as it will follow an existing gravel road that is already transformed and considering that the pipe can be laid on the surface (and covered with rocks for protection) it will not result in vegetation removal.

Roads and Parking Areas:

The proposed internal road network will include a minimum 2.0% crossfall and 0.5% longitudinal slope. The internal road network will be a 5.5m wide brick paved road with formal kerbs/edgings, roadside channels and a stormwater drainage network. Internal roads will not be subdivided and will form part of the communal areas maintained by the Body Corporate of the proposed development.

It is proposed for the gravel sections of Rietvlei Road to be hard surfaced within the constraints of the existing road.

Stormwater:

The pre-development site drains from the central portion (highest point on the property) towards the north-western and southern boundaries. No formal bulk municipal stormwater infrastructure is available in vicinity of the property. Due to the high permeability of the insitu dune sands, stormwater runoff permeates into the subsoil layers and therefore a formalised bulk stormwater connection is not required for the proposed development.

An open swale stormwater network will be designed which will have sufficient capacity to manage and convey up to a 1:5 year rainfall event. The open swales stormwater network will follow the road network and will have inlet structures and pipe culverts at road crossings. If a rainfall event with a return period larger than 1:5 year occurs, the internal roadways will act as overland flow routes which will convey stormwater run-off towards the lower lying eastern portion of the property.

Provision will be made for a subsoil drainage network beneath the internal roads. The subsoil drainage network will consist of a 110mm diameter perforated pipe network installed 800mm below the final road level.

Due to the poor cohesion of the dune sands, the following erosion preventative measures will be included in the stormwater design:

- Minimize the concentration of stormwater to prevent high flow rates.
- Route run-off from hard surfaces into swales.
- Promote sheetflow into open swales.
- Formalise (armorflex) channels with an internal velocity more than 1m/s.
- Landscape unlined channels with appropriate vegetation.
- Install energy dissipation structures at high energy discharge points.

Solid Waste:

The collection of domestic waste from individual housing units will be administrated by the homeowners association of the proposed development. Solid waste will be transferred to a communal refuse storage located at the entrance of the proposed development from where it will be collected by the Municipality into their waste collection schedule.

Adequate turning space for a standard refuse truck has been incorporated in the proposed entrance design.

4.5. Indicate how access to the proposed site(s) will be obtained for all alternatives.

Access to the proposed development site will be from Rietvlei Road situated outside the northern boundary of Portion 38 of Farm Ganse Valleie 444. Rietvlei Road connects with the N2 (National Road) and provides access to a public parking area next to the Keurbooms Estuary.

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	3	9	0	0	0	0	0	0	0	0	0	4	4	4	0	0	0	3	8
------	--	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

4.7.	Coordinates of the proposed site(s) for all alternatives:																					
	Latitude (S)										34°			01'		29.47"						
	Longitude (E)										23°			23'		14.22"						

SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS

1. EXEMPTION APPLIED FOR IN TERMS OF THE NEMA AND THE NEMA EIA REGULATIONS

Has exemption been applied for in terms of the NEMA and the NEMA EIA Regulations. If yes, include a copy of the exemption notice in Appendix E18.	YES	NO
---	-----	----

2. IS THE FOLLOWING LEGISLATION APPLICABLE TO THE PROPOSED ACTIVITY OR DEVELOPMENT

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.	YES	NO
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.	YES	NO
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3.	YES	NO
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	YES	NO
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")	YES	NO
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	YES	NO
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	YES	NO
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.	YES	NO

3. OTHER LEGISLATION

List any other legislation that is applicable to the proposed activity or development.
<p>Rezoning in terms of SPLUMA. Portion 38 of Farm Ganse Valleï 444 is zoned Agricultural Zone I and it is proposed to subdivide and rezone the development site into Residential Zone II and Open Space Zone III.</p> <p><u>National Forest Act, Act No. 84 of 1998, as amended:</u> The final preferred SDP was purposefully informed by identified individual trees as well as clumps of protected trees.</p> <p>Although care has been taken to avoid the majority of the surveyed protected trees and clumps, micro-siting of units/structures and infrastructure, is a recommendation of this environmental assessment process to ensure that units/roads/structures and/or infrastructure do not result in the damage or removal of protected trees found across the study site.</p> <p>From experience it is noted that time lapse from when the protected tree survey is undertaken, to inform the environmental/planning applications, till implementation, could be a number of years during which time germination of more protected tree species may occur and/or surveyed trees would have grown larger. It is therefore a recommendation that the actual footprints of each unit be checked prior to final construction.</p> <p>In the event that trees may require pruning or trimming to accommodate a unit, the Holder of the EA at the time will be responsible for obtaining the necessary license prior to impacting on the tree(s).</p>

4. POLICIES

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.
4.1. Western Cape Provincial SDF (2014)

The Western Cape Provincial Spatial Development Framework (PSDF) was approved in 2014 by the Western Cape Parliament and serves as a strategic spatial planning tool that “communicates the provinces spatial planning agenda”.

The proposed residential development compliments the SDF’s spatial goals that aim to take the Western Cape on a path towards:

- Greater productivity, competitiveness, and opportunities within the spatial economy (optimising urban development within the urban edge).
- More inclusive developments and strengthening the economy in rural areas (Plettenberg Bay is a prominent urban node and smaller erven with smaller units are deemed to be in demand).
- Strengthening resilience and sustainable development (the property is not being utilised for its original intended purposes and poses a management and safety challenge).

The following policies laid down by the PSDF were also considered (refer to the specialist planning report for a more detailed description, Appendix G6):

1. Policy R1: Protect Biodiversity & Ecosystem Services

- The proposed development did consider the CBA areas and all other sensitive areas.
- The proposed layout of the development stayed clear of the sensitive areas.

2. Policy E3: Revitalise and Strengthen Urban Space-Economies as the Engine of Growth

- The proposed development creates additional employment & housing opportunities.

3. Policy S1: Protect, Manage and Enhance sense of Place, Cultural and Scenic Landscapes

- The proposed development is infill development, preventing urban sprawl (within the urban edge).

4. Policy S3: Promote Compact, Mixed-use and Integrated Settlements

- The proposal constitutes infill development within an existing urban environment.
- The proposed activity will contribute to the provision of additional housing opportunities.

5. Policy R3: Safeguard the Western Cape's Agricultural and Mineral Resources, and Manage their sustainable use

- The property has low potential agricultural land. It is earmarked for urban development.
- The proposed activity is exempted from the provisions of Act 70 of 1970.

6. Policy R5: Safeguard Cultural and Scenic Assets

- The proposed development layout stayed clear of protected areas.

7. Policy S5: Promote Sustainable, Integrated and Inclusive Housing in Formal and Informal Markets

- The proposal will contribute to a different range of housing opportunities.
- The proposed activity will increase the density of the area.
- For the most part the development can be service via existing municipal service networks although limited upgrades and interventions are necessary to ensure link services and capacity so as not to overload the municipal network.

4.2. Eden Spatial Development Framework (2017)

The Eden District Spatial Development Framework was approved in 2017 and aims to establish a strong strategic direction and vision, towards increasing levels of detail in the spatial recommendations that are directive rather than prescriptive and providing guidance to local municipalities in the district regarding future spatial planning, strategic decision making and regional integration.

The vision and strategic direction identify four key drivers of spatial change within the district. These four strategies lie at the heart of this SDF and the problem statement, spatial concept, spatial proposals, and implementation are organised around these directives.

According to the Eden SDF, Plettenberg Bay is categorised as a “Specialised Coastal Centre” and the function or role of Plettenberg Bay is an “exclusive tourism” orientated town. The proposed activity complies with the following Policy Statements:

- Policy 3.1. Direct and encourage growth to match capacity, resources and opportunity in relation to the regional socio-economic hierarchy of cities and towns.
- Policy 3.3. Optimise existing infrastructure capacity and economic opportunity by directing mixed use, higher density development to areas of opportunity.
- For the most part the development can be service via existing municipal service networks although limited upgrades and interventions are necessary to ensure link services and capacity so as not to overload the municipal network.

5. GUIDELINES

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal.

5.1. Guideline on Need and Desirability, DEA (2017)

Refer to section E(12) for a detailed Need & Desirability project description.

5.2. Guideline for the Review of Specialist input in the EIA process (June 2005)

The guideline was followed to:

- Ensure that the specialists inputs meet the terms of reference.
- Ensure that specialist inputs are provided in a form and quality that can be incorporated into the integrated report and can be understood by non-specialists.

5.3. Guideline for Environmental Management Plans (June 2005)

The EMPr has been included with this Pre-Application Draft Basic Assessment to provide practical and implementable actions to ensure that the development maintains sustainability and minimise impacts through all its phases. The document is finalised as per the Guidelines and requirements of NEMA.

5.4. Guideline on generic terms of Reference for EAPs and Project Schedules (March 2013)

Followed guidance on:

- Generic Requirements for EAPs (what an EAP must manage).
- Generic Requirements for persons compiling a specialist report.
- Scope of Work (project description, primary responsibility, anticipated inputs etc.).

5.5. Guideline for determining the scope of specialist involvement in the EIA process (June 2005)

This Guideline was used to determine the timing, scope and quality of specialist inputs in the EIA process along with the Specialist Protocol requirements.

5.6. Guideline on Alternatives (March 2013)

Refer to section H for a detailed Alternatives comparison for the proposed project.

5.7. Guideline for involving biodiversity specialists in the EIA process (June 2005)

This guideline was used to identify the key triggers and issues which will require specialist input on biodiversity in addition to the Specialist Protocols. Refer to section C(6) for a detailed motivation for including/excluding specific specialist studies during the project.

5.8. Guideline for involving social assessment specialists in the EIA process (February 2007)

Refer to section C(5) for an information on the socio-economic description.

6. PROTOCOLS

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form

According to the DEA&DP series of guidelines for the involvement of specialists in the EIA process (2005), one of the underpinning generic principles is to **eliminate the unnecessary specialist involvement** through proactive project planning and design to avoid or sufficiently reduce negative impacts. Another is to **maximise the use of existing relevant information** prior to involving a specialist. This includes the input from the EAP and specialists, in the form of site photographs and site inspections. These principles apply to the specialist studies that have been identified in the screening tool and motivated as not necessary in this report.

According to the Screening Tool the following themes have been identified as sensitive (note that the original as well as an updated version of the Screening Tool is attached to this report).

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Animal Species Theme		X		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme	X			
Civil Aviation Theme		X		
Defence Theme				X
Paleontology Theme			X	
Plant Species Theme			X	
Terrestrial Biodiversity Theme	X			

Agriculture (High Sensitivity) - The property has been utilised for natural grazing/horse paddocks over many years. Although zoned agriculture, the 'usable' land is small with more than half of the property forming part of the estuary, and with no registered water rights it is not a feasible, commercial agricultural unit despite the Screening Tool indicating it has high potential. It was confirmed by the Department of Environmental Affairs and Development Planning that Portion 38 of the farm Ganse Valleï, Plettenberg Bay was included in the Knysna, Wilderness and Plettenberg Bay Regional Structure Plan. This portion was designated as '**Recreational**'. **Portion 38 of the Farm Ganse Valleï 444 is therefore exempt from the provisions of the Subdivision of Agricultural Land Act, 1970 (Act 70 of 1970) (Appendix L)**. An Agricultural Assessment is therefore not necessary. The sensitivity rating is **refuted** and the EAP is of the opinion that the theme is not applicable to this application. Since there is no provision in the Protocols for 'not applicable' the lowest possible rating level of **Low** remains. The Western Cape Department of Agriculture: Land Use Management deems that an Agricultural Impact Assessment would not be necessary (please refer to Appendix E7). The Department of Agriculture remains a registered stakeholder for the environmental authorisation application process.

Animal Species (High Sensitivity) - The proposed development site is transformed and the small area of 3.17ha for the proposed activity is unlikely to be considered important fauna habitat. The sensitivity rating is **refuted** and the EAP is of the opinion that the more appropriate sensitivity is **Medium** due to the transformed nature of the development footprint. Due to the proposed

development being limited to the western portion of the property and avoiding all sensitive habitat features identified, it is submitted that an **Animal Species Compliance Statement** will be sufficient. The Medium sensitivity for the Animal Species Theme was verified in the Animal Species Theme Compliance Statement (Appendix G4). The Animal Species Compliance Statement concluded that the proposed development portion is not considered to be suitable or critical habitat for any of the animal species identified in the Screening Tool Report. Areas with High or Very High Site Ecological Importance will not be affected by the proposed development. Cape Nature will be consulted during the public participation process to inform the Basic Assessment process.

Aquatic Biodiversity (Very High Sensitivity) – The proposed development site is located in close proximity to the Keurbooms Estuary. There are no watercourse features identified on the portion proposed for development. The DFFE Screening Tool Report identified the proposed development site as being of Very High aquatic biodiversity sensitivity. The sensitivity rating of Very High is **refuted** and the EAP is of the opinion that a more appropriate sensitivity rating of **Low** should apply to the Aquatic Biodiversity Theme. Due to the proposed development being limited to the western portion of the property, avoiding all estuarine features identified, it is submitted that an **Aquatic Biodiversity Compliance Statement** will be sufficient. The Aquatic Biodiversity Compliance Statement confirmed the Low sensitivity rating for the proposed development site (Appendix G1). BOCMA will be consulted during the public participation process to inform the Basic Assessment process.

Archaeological and Cultural Heritage (Including Palaeontology) (Very High Sensitivity) - The proposed development entails the rezoning of a site more than 10000m² in extent. Therefore a Notice of Intent to develop has been submitted to Heritage Western Cape on 19 October 2022. HWC in their response to the NID, confirmed that an Integrated HIA is required due to the presence of two potential burial sites.

The Committee approved the HIA compiled by Perception Planning dated March 2023 (Appendix E1).

Civil Aviation (High Sensitivity) – The development of a residential estate, within an urban area, will not exceed any of the Civil Aviation Regulations in terms of height and does not pose a threat to air traffic in terms of any obstruction. The sensitivity rating is **refuted**, and the EAP is of the opinion that the theme is not applicable to this application. Since there is no provision in the Protocols for 'not applicable' the lowest possible rating level of **Low** remains. The only reason for Civil Aviation being highlighted in the Screening Tool is because the site is ~8.9km from the Plettenberg Bay Airport. **There are no reasonable grounds for any specialist studies to confirm this.** The SACAA remains a registered stakeholder for the environmental authorisation application process.

Defence (Low Sensitivity) – The development will pose no threat to military or defence forces of South Africa. The site is not situated near any military facilities. The EAP is of the opinion that the theme is not applicable to this application. Since there is no provision in the Protocols for 'not applicable' the lowest possible rating level of Low remains. **There are no reasonable grounds to conduct any specialists' studies to affirm this and further consultation with Department of Defence is not necessary.**

Plant Species (Medium Sensitivity) – The DFFE Screening Tool Report identified the proposed development site as being of Medium Plant Species sensitivity. The proposed development footprint is concentrated in areas classified as being secondary fynbos, degraded thicket and secondary thicket. It is the opinion of the EAP that the site sensitivity theme as indicated in the Screening Tool Report is accurate and that Medium and Low sensitivity ratings apply. A **Botanical Compliance Statement** will be sufficient for the proposed development. The Botanical Compliance Statement verified the Medium Sensitivity for the proposed development site

(Appendix G3). CapeNature and DFFE remain registered stakeholders for the environmental authorisation application process.

Terrestrial Biodiversity (Very High Sensitivity) – The DFFE Screening Tool Report identified the proposed development site as being of Very High sensitivity. A **Terrestrial Biodiversity Impact Assessment** was undertaken for the proposed development. CapeNature and DFFE remain registered stakeholders for the environmental authorisation application process.

Additional protocols identified in the Screening Tool Report:

Landscape/Visual Impact Assessment: The proposed development site is located on an isolated portion of land. The proposed development will not exceed two storeys with development only proposed on already transformed/disturbed grassland areas. The surrounding community already contains similar height residential units. The proposed development will therefore not result in a significant change in land use compared to the existing surrounding uses. The development of additional residential units in the community will increase the character/value of the greater area and would therefore not require a landscape/visual impact assessment.

Socio-Economic Assessment: A socio-economic study has not been undertaken for this application mainly due to the compatibility of the land use with surrounding land uses and alignment with the local spatial planning for the area.

Consideration was given to the following key triggers for a socio-economic impact assessment, as these are stipulated in the Guideline for Social Impact Assessment as drawn up for the Department of Environmental Affairs by Tony Barbour (2007).

- Consideration of the nature of the receiving environment, in particular whether vulnerable community, or areas with high poverty/unemployment, or areas where livelihoods depend on existing social relationships and income generating patterns, will be affected;
 - *The study area does not qualify in terms of these characteristics – the proposed development site area forms part of the urban landscape. The community of the surrounding area is not vulnerable and/or an area with high poverty/unemployment.*
- Areas where access to services, mobility/community networks are affected, or where livelihoods depend on access to and use of environmental resources and services;
 - *The property is not utilised for ecosystem services at a communal scale. Care has been taken to place infrastructure in areas that do not contain sensitive estuarine habitat and the remaining natural areas will continue to function as normal.*
- Areas where the proposed land use will alter the sense of place or character of the area, or where the project represents a significant change in land use from the prevailing use;
 - *Development of residential units within an urban context, will not change the character of the area (although the vacant status of the property itself will change) and as such will not result in a significant change in the land use compared to the prevailing urban use;*
- Projects that require large workforce relative to the size of the existing workforce such as dams, railways, roads;
 - *The development will not require a larger workforce compared to similar developments in the surrounding area. The proposed development will provide employment opportunities for the local community during the construction and operational phases.*
- Areas of important tourism or recreational value should conflicting land uses be introduced;
 - *The coastal community/suburbs of Plettenberg Bay are characterised by a combination of primary dwellings, secondary (holiday) homes, as well as resort type developments mainly due to its proximity to the ocean/beach/Keurbooms*

Estuary. Development of residential units is not considered a conflicting land use but rather compatible with the tourism/recreational/residential qualities of the area;

Having considered the above-mentioned key triggers that would typically indicate the need for a socio-economic impact assessment to be undertaken to inform decision-making, it was determined that the proposal is not the type of activity (both in nature and in scale) for which such a study is required.

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 1	Describe the portion of the proposed development to which the applicable listed activity relates.
12	<p>The development of –</p> <p>(x) buildings exceeding 100 square metres in size;</p> <p>(xii) infrastructure or structures with a physical footprint of 100 square metres or more.</p> <p>The development of –</p> <p>(ii) infrastructure or structures with a physical footprint of 100 square metres or more;</p> <p>Where such development occurs –</p> <p>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.</p>	<p>The DEA&DP requested clarity regarding the exclusion of Activity 12 of Listing Notice 1 in comment on the Notice of Intent.</p> <p>The proposed development will not have any physical infrastructure within 32m of a watercourse.</p> <p>The eastern housing units are approximately between 50m and 100m from the highwater mark of the Keurbooms Estuary.</p> <p>An estuary is not defined as a watercourse. The development will therefore not take place within the regulated area of a watercourse.</p>
17	<p>Development –</p> <p>(v) if no development setback exists, within a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater;</p> <p>In respect of –</p> <p>(e) [buildings of 50 square metres or more; or</p> <p>(f)] infrastructure or structures with a development footprint of 50 square metres or more.</p>	<p>The eastern portion of the proposed development site falls within 100m from the highwater mark of the Keurbooms Estuary.</p>
19A	<p>The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit,</p>	<p>The eastern portion of the proposed development site is located within 100 metres inland of the high-water mark of the Keurbooms Estuary.</p>

	<p>pebbles or rock of more than 5 cubic metres from –</p> <p>(ii) the littoral active zone, an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater.</p>	
27	<p>The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such vegetation is required for –</p> <p>(i) The undertaking of a linear activity; or</p> <p>Maintenance purposes undertaken in accordance with a maintenance management plan.</p>	<p>The proposed development entails the clearance of ~3.17ha of indigenous vegetation with remaining landscaped/natural open space areas within the development footprint area.</p>
28	<p>Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development:</p> <p>(ii) will occur outside an urban area, where the total land to be developed is bigger than 1ha.</p>	<p>The proposed development site is located outside the Urban Area and is zoned Agriculture Zone I. The proposed development entails the clearance of ~3.17ha of indigenous vegetation.</p>
Activity No(s):	<p>Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 3</p>	<p>Describe the portion of the proposed development to which the applicable listed activity relates.</p>
4	<p>The development of a road wider than 4 metres with a reserve less than 13,5 metres.</p> <p>(i) Western Cape</p> <p>(ii) Areas outside urban areas;</p> <p>(aa) Areas containing indigenous vegetation;</p> <p>(bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined.</p>	<p>The proposed development entails the development of 5.5m wide internal access roads in an area containing indigenous vegetation outside an urban edge.</p>
12	<p>The clearance of an area of 300m² of more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.</p> <p>(i) Western Cape</p> <p>(i) Within any critically endangered or endangered ecosystem listed in terms of</p>	<p>The SANBI Red List of Ecosystems (2021) indicate that only the western portion of the proposed development site contains Garden Route Shale Fynbos. The Terrestrial Biodiversity Impact Assessment concluded that the habitat within the proposed development footprint is fynbos, thicket, and degraded or transformed areas. The fynbos is in poor condition</p>

	<p>section 52 of the NEMBA or prior to the publication of such list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;</p> <p>(iii) Within the littoral active zone or 100 metres inland from high-water mark of the sea or an estuarine functional zone, whichever distance is greater, excluding where such removal will occur behind the development setback line on erven in urban areas.</p>	<p>and appears from the species composition and structure to be either secondary or degraded.</p> <p>The remainder of the proposed development footprint is located in designated Goukamma Dune Thicket (Least Concern Threat Status: 2021).</p>
14	<p>The development of –</p> <p>[(x) buildings exceeding 10 square metres in size;</p> <p>(xii) infrastructure or structures with a physical footprint of 10 square metres or more.]</p> <p>Where such development occurs –</p> <p>(c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse.</p> <p>(i) Western Cape</p> <p>(i) Outside urban areas:</p> <p>(ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans.</p>	<p>The DEA&DP requested clarity regarding the exclusion of Activity 14 of Listing Notice 3 in comment on the Notice of Intent.</p> <p>The proposed development will not have any physical infrastructure within 32m of a watercourse.</p> <p>The eastern housing units are approximately between 50m and 100m from the highwater mark of the Keurbooms Estuary.</p> <p>An estuary is not defined as a watercourse. The development will therefore not take place within the regulated area of a watercourse.</p>

Note:

- The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted.
- Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.

List the applicable waste management listed activities in terms of the NEM:WA

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Category A	Describe the portion of the proposed development to which the applicable listed activity relates.

List the applicable listed activities in terms of the NEM:AQA

Activity No(s):	Provide the relevant Listed Activity(ies)	Describe the portion of the proposed development to which the applicable listed activity relates.

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.
<p>Alternative 1 (Preferred)</p> <p>The applicant proposes to develop a residential lifestyle estate, with private amenities, on Portion 38 of Farm Ganse Vallei 444 (8.58ha), Plettenberg Bay (Bitou Municipality, Western Cape Province). The property is situated east of the N2 national road and is bordered by the Goose Valley Golf Estate (south and west), Keurbooms Estuary (east) and the Meadows Residential Estate (north-west), as well as private residential development directly north of the site. A large single residential dwelling with stables and paddocks occupy the property. The property was historically used for grazing /horse paddock activities (Figure 1).</p> <p>Portion 38 of Farm Ganse Vallei 444 is currently zoned Agriculture Zone I and it is the intention of the applicant to subdivide the property into two (2) portions and to rezone it to a Residential Zone II portion (3.17ha) and Open Space Zone III portion (5.41ha) (Figure 2).</p> <p>The proposed development within the Residential Zone II portion will entail the following infrastructure:</p> <ul style="list-style-type: none"> • Twelve (12) x sectional title group housing units (single storey), each with a double garage and two (2) additional parking bays. Each unit will cover ~655m² and will therefore calculate to 1.39 units per hectare over the entire site. • Entrance gate (from Rietvlei Road). • Guard house. • Maintenance and staff rooms. • Communal areas (clubhouse, conference room, gym, pool, doctor/nurse office and admin office). • Six (6) x visitor parking bays at the communal buildings / facilities. • Internal access roads (5.5m wide). No development is proposed in the Open Space Zone III portion (~5.41ha) and this area which encompass the Keurbooms Estuary will act as a private open space area. • Partial water link pipeline infrastructure to connect to the existing Goose Valley reservoir, as well as upgrade of a portion of existing water line. • Sewage pump station on-site and short sewer lines to connect to the existing municipal sewer network system. <p>Access throughout the private open space will be via existing footpaths from within the site, as well as existing footpaths that traverse the estuary from the public parking area at the bottom of Rietvlei Road.</p> <p>Access to the proposed development site will be directly from Rietvlei Road (Minor Road 7214) within a 9.45m wide right of way servitude (Portion 4 of Farm 444) along the northern boundary of Portion 38 of Farm Ganse Vallei 444. The Rietvlei Road connects directly with the N2 National Road and is an existing tar road.</p> <p>The proposed development will be a sectional title development (no subdivision), and therefore all the outdoor spaces are considered communal open space. Given that a large portion (~5.41 ha) of the property will be zoned 'Open Space Zone III', internal open space is limited within the proposed Residential Zone II portion.</p>	

The proposed units have been specifically positioned within the transformed, flat portion of the site which avoids higher sensitive areas identified by specialist studies.

All existing buildings/structures which do not form part of the newly proposed development (paddocks, entrance gate, dwelling) will be demolished.

2.	Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21.
----	---

The proposed development is not in line with the existing land use rights (which is Agriculture 1).

It is therefore the intention of the applicant to subdivide and **rezone** the property to **Residential Zone II** and **Open Space Zone III** to bring the proposal in line with land use right requirements.

It was confirmed by the Department of Environmental Affairs and Development Planning that Portion 38 of the farm Ganse Valleï, Plettenberg Bay was included in the Knysna, Wilderness and Plettenberg Bay Regional Structure Plan. This portion was designated as **'Recreational'**. **Portion 38 of the farm Ganse Valleï 444 is therefore exempt from the provisions of the Subdivision of Agricultural Land Act, 1970 (Act 70 of 1970) (Appendix L).**

3.	Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved.
----	--

Existing approvals: Not to the knowledge of the EAP.

Should the Department of Environmental Affairs have copies of any previous environmental applications that may have bearing on this application, Cape EAPrac kindly request access to documents that may have been in the public domain to ensure that all relevant and applicable information can be considered.

4.	Explain how the proposed development will be in line with the following?
----	--

4.1	The Provincial Spatial Development Framework.
-----	---

Western Cape Provincial SDF (2014)

The Western Cape Provincial Spatial Development Framework (PSDF) was approved in 2014 by the Western Cape Parliament and serves as a strategic spatial planning tool that "communicates the provinces spatial planning agenda".

The proposed residential development compliments the SDF's spatial goals that aim to take the Western Cape on a path towards:

- Greater productivity, competitiveness, and opportunities within the spatial economy (optimising urban development within the urban edge).
- More inclusive developments and strengthening the economy in rural areas (Plettenberg Bay is a prominent urban node and smaller erven with smaller units are deemed to be in demand).
- Strengthening resilience and sustainable development (the property is not being utilised for its original intended purposes and poses a management and safety challenge).

The following policies laid down by the PSDF were also considered (refer to the specialist planning report for a more detailed description):

1. Policy R1: Protect Biodiversity & Ecosystem Services
 - The proposed development did consider the CBA areas and all other sensitive areas.
 - The proposed layout of the development stayed clear of the protected areas.
2. Policy E3: Revitalise and Strengthen Urban Space-Economies as the Engine of Growth
 - The proposed development creates additional employment & housing opportunities.
3. Policy S1: Protect, Manage and Enhance sense of Place, Cultural and Scenic Landscapes

- The proposed development is an infill development, preventing urban sprawl (within the urban edge).

4. Policy S3: Promote Compact, Mixed-use and Integrated Settlements

- The proposal constitutes infill development within an existing urban environment.
- The proposed activity will contribute to the provision of additional housing opportunities.

5. Policy R3: Safeguard the Western Cape's Agricultural and Mineral Resources, and Manage their sustainable use

- The property has low potential agricultural land. It is earmarked for urban development.
- The proposed activity is exempted from the provisions of Act 70 of 1970.

6. Policy R5: Safeguard Cultural and Scenic Assets

- The proposed development layout stayed clear of protected areas.

7. Policy S5: Promote Sustainable, Integrated and Inclusive Housing in Formal and Informal Markets

- The proposal will contribute to a different range of housing opportunities.
- The proposed activity will increase the density of the area.

4.2 | The Integrated Development Plan of the local municipality.

Bitou Integrated Development Plan (2017-2022)

The IDP is a municipal planning instrument that drives the process to address the socio-economic challenges as well as the service delivery and infrastructure backlogs experienced by communities in the municipality's area of jurisdiction.

Bitou Municipality has adopted strategic objectives to deliver on its vision and to help realize the objectives of the district economic development, provincial strategic goals and national development plan. Strategic objectives that are relevant to the proposed development:

- Provide excellent service delivery to the residents of Bitou Municipality.
- Re-establish, grow and expand tourism within Bitou Municipality.
- Facilitate growth, jobs and empowerment of the people of Bitou.
- To ensure the safety of residents and visitors of Bitou Municipality.
- To build institutional and financial sustainability.

The property is in Ward 2 of the Bitou Municipality. The following Ward based planning interventions are applicable to the land development application:

Economic Development

Make development more accessible and expedite applications (rezoning and building plans) make industrial and commercial development possible.

Extract from Specialist Planning Report (Marika Vreken Town and Regional Planners, 2023): *The IDP is a municipal planning tool to integrate municipal planning and allocate municipal funding to achieve strategic objectives that will contribute to the overall municipal vision. Although this application is not considered to be an important strategic objective it can be motivated that the development of the land supports important municipal interventions amongst others creating economic jobs within the ward. Further to the above the proposed development will contribute to the economic expenditure in the area, providing housing opportunities, create employment and the make use of existing services network. It is the considered opinion that the proposed development will contribute to the strategic objectives within Ward 2.*

4.3. | The Spatial Development Framework of the local municipality.

Bitou Spatial Development Framework (2017)

The updated Bitou SDF was approved by the Bitou Municipal Council in May 2017. The SDF, is therefore, the primary spatial tool for guiding development within the municipal area.

The proposed development complements the Bitou SDF goals in regards to the following aspects:

- The portion to be developed is earmarked as 'existing urban development' (Figure 9).
- The portion to be developed is situated inside the urban edge.
- The development will impact as little as possible on the environmental integrity by promoting:
 - A large portion of land (5.41ha) is proposed to be zoned as Open Space III.
 - The majority of the CBA area will remain intact and will remain undeveloped.
 - Development is proposed on elevated, already transformed and disturbed areas earmarked for development.
 - The development will not have negative visual impacts as it is surrounded by similar developments within the designated urban edge.

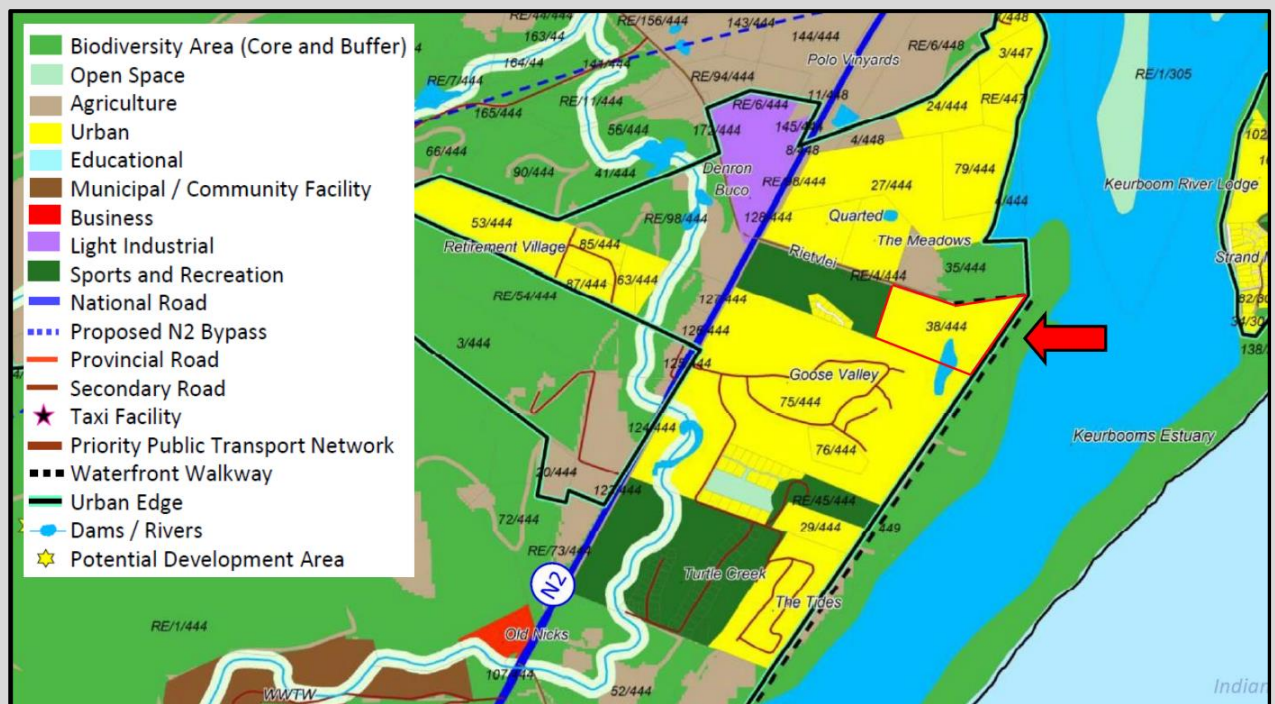


Figure 9: Extract from Bitou Spatial Development Framework (2021).

4.4.	The Environmental Management Framework applicable to the area.
	Not applicable.
5.	Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.

Aquatic Biodiversity Compliance Statement (Confluent Consulting): The Aquatic Biodiversity Compliance Statement stipulated the following:

- A estuary habitat was delineated in the eastern portion of the proposed development property.
 - Mitigation: The proposed development layout avoids the entire delineated estuary habitat in the eastern portion of the property. Development infrastructure will be focussed in the elevated western portion of the property which avoids the steep slope and remaining thicket habitat.
- A estuary buffer of 33m is recommended.
 - Mitigation: The 33m estuary buffer will be adhered to as this will protect the Keurbooms Estuary from direct impacts and will provide a level of connectivity

between the terrestrial and estuarine areas through the remaining thicket extending to the estuary.

Terrestrial Biodiversity Impact Statement (David Hoare Consulting): The Terrestrial Biodiversity Impact Assessment stipulated the following:

- The habitats on the property with the highest sensitivity and ecological value (estuarine habitats and mesic thicket) are completely excluded from the development footprint.
 - Mitigation: The proposed development layout avoids all habitats with a high sensitivity and ecological value. The development footprint is focussed on secondary or degraded habitats.

6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development.
----	--

The Western Cape Biodiversity Spatial Plan (WCBSPP) is a spatial tool that comprises the Biodiversity Spatial Plan Map (BSP Map) of biodiversity priority areas, accompanied by land use guidelines, development planning, environmental assessment & regulation, and natural resource management.

The eastern portion of Portion 38 of Farm Ganse Vallei Farm 444 is located in a designated Critical Biodiversity Area, specifically a estuary area (Figure 10). A very small portion of the property contains designated Ecological Support Areas, specifically ESA2 (restore from other land use). No development is proposed in the critical biodiversity areas.

Critical Biodiversity Area 1

Definition: Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.

Objective: Maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.

Critical Biodiversity Area 2

Definition: Areas in a degraded or secondary condition. Required to meet biodiversity targets for species, ecosystems or ecological processes and infrastructure.

Objective: Maintain in a functional, natural or near-natural state, with no further loss of habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.

Ecological Support Area 2

Definition: Not essential for meeting biodiversity targets. Important in supporting functioning of PAs or CBAs. Often vital for ecosystem services.

Objective: Restore/minimise impact on ecological infrastructure functioning, especially soil and water-related services.



Figure 10: CBA and ESA map of proposed development site (CapeFarmMapper, 2023).

7.	Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.
----	--

Considerations regarding the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("**ICMA**"):

- Whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and protecting those areas.
 - The proposed development is not located in coastal public property and will have no detrimental affect on surrounding coastal public properties.
 - Portion 38 of Farm Ganse Vallei 444 is not designated as coastal access land.
 - However, the proposed development site is partially located in the Coastal Protection Zone where development will be limited to already disturbed, higher lying area of the property while preserving/maintaining the remaining coastal habitat that extends into the estuary and continues to conserve the elevated slope that separates the site from the estuary (eastern portion of property) (Figure 11).

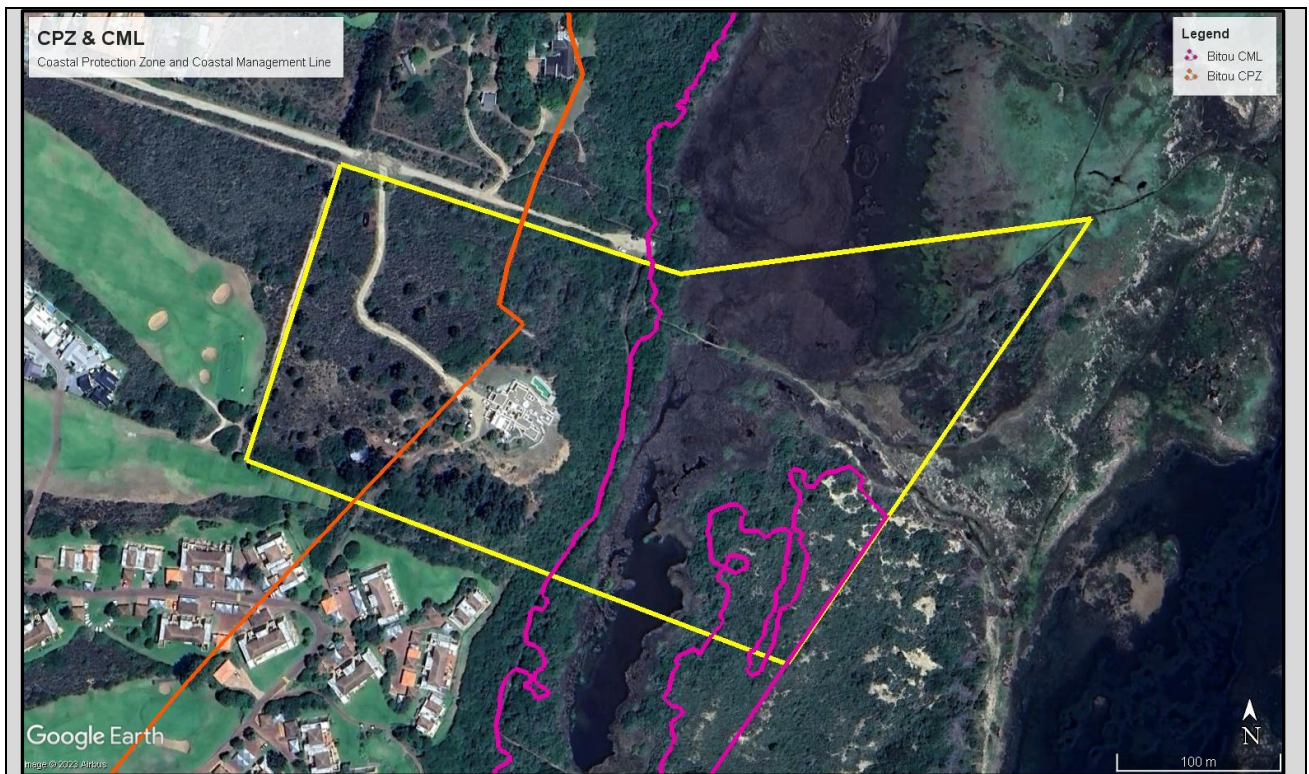


Figure 11: Coastal Protection Zone and Coastal Management Line in reference to Portion 38 of Farm Ganse Valle 444.

- The estuarine management plans, coastal management programmes and coastal management objectives applicable in the area.
 - The Keurbooms Estuary is of high conservation value and in terms of the management objectives, the Keurbooms-Bitou Estuarine Management Plan (K-BEMP) stipulates that formal protections mechanisms to obtain conservation status for land parcels within or spanning the estuarine functional zone (EFZ) must be investigated. The following guidelines are provided in the K-BEMP and are relevant to the proposed land-use and infrastructure:
 - *Planning should allow for the maintenance of a riparian zone along the length of the estuary where sensitive habitats (wetlands, supratidal saltmarshes and indigenous vegetation) occur.* The implementation of the coastal management lines (CML), coastal protection zones (CPZ), flood lines and the inclusion of CBA's within all planning schemes will allow for compliance with this guideline. The proposed development layout will allow for the maintenance/preservation of the riparian zone located in the eastern portion of Portion 38 of Farm Ganse Valle 444.
 - *Development and land use in the catchment and estuarine area should not lower water quality or interfere with normal hydrodynamic or sedimentary process and cycles.* The proposed development will not discharge any effluent water in the estuarine area and will therefore not alter the water quality.
- Socio-Economic impact if the activity is authorised / not authorised.
 - If the proposed development is authorised, it will have the following impacts relating to socio-economics:
 - Create temporary and permanent employment opportunities during construction and operational phase.
 - Preserve and maintain the riparian zone in the eastern portion of the proposed development site.

- Optimise vacant land in an urban setting, therefore increasing the holistic financial sustainability of Bitou Municipality.
 - Meet the management objectives of the Keurbooms-Bitou Estuarine Management Plan.
 - If the proposed development is not authorised, it will have the following impacts relating to socio-economics:
 - Property remains vacant and will therefore not increase the holistic financial sustainability of Bitou Municipality.
 - Property will not be maintained in such a way as to support the management objectives of the Keurbooms-Bitou Estuarine Management Plan.
 - No employment opportunities will be created for the local community of Bitou Municipality.
- The likely impact of the proposed activity on the coastal environment, including the cumulative effect of its impact together with those of existing activities.
 - The proposed development will be limited to already disturbed areas on Portion 38 of Farm Ganse Vallei 444, therefore applying avoidance mitigation to the riparian zone. An environmental management programme will be adhered to for the proposed development which will aim to preserve/maintain the natural coastal environment.
- The likely impact of coastal environmental processes on the proposed activity.
 - The proposed development will not be affected by coastal processes such as wave, current and wind action, erosion, accretion, sea-level rise, storm surges and flooding due to its elevated position as well as the remaining natural vegetation that acts as a buffer to potential future coastal processes that may include flooding/storm surges and coastal erosion. The eastern portion of the proposed development site will be maintained in its natural state which will provide a sizeable buffer between the development activities and the Keurbooms Estuary.

It is evident from the considerations regarding the **NEM:ICMA** mentioned above, that the proposed development will not prejudice the achievement of any coastal management objectives/processes and is not in contrary to the interests of the surrounding community. The proposed development will not cause irreversible or long-lasting adverse affects to any aspect of the coastal environment, coastal erosion management requirements or coastal processes. The proposed development will not deny the public access to the coastal environment.

8.	Explain whether the screening report has changed from the one submitted together with the application form. The screening report must be attached as Appendix I.
An updated version of the Screening Report has been attached (both 2023 and 2024 versions).	
9.	Explain how the proposed development will optimise vacant land available within an urban area.
The property is currently largely vacant and makes no contribution to the local economy of the town. The proposed development promotes smart growth by ensuring the efficient use of the land and infrastructure, by containing urban sprawl and prioritising infill, intensification and redevelopment within settlements/designated urban areas.	
10.	Explain how the proposed development will optimise the use of existing resources and infrastructure.
Access to the proposed development site will be from an existing public road (Rietvlei Road). The proposed development will connect to the existing municipal sewer and water infrastructure with limited upgrades/link services required.	
11.	Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16).

Sewage Network: The proposed development will be accommodated within the existing Goose Valley Main pumping station drainage area.

The existing Goose Valley Main pumping station with an accompanying 200mm diameter rising main have sufficient capacity to accommodate the proposed development on Portion 38 of Farm Ganse Vallei 444.

However, the following infrastructure will be required to connect the internal sewer system of the proposed development to the existing Plettenberg Bay sewer system (Figure 3):

- New private pump station on Portion 38 of Farm Ganse Vallei (Item 4 in Figure 3). The location of the proposed pump station is indicated on the Site Development Plan (Appendix B1).
- Rising main (75mm diameter, approximately 470m long) in the Rietvlei Road road reserve (Item 5 in Figure 3).
- Outfall sewer (160mm diameter, approximately 120m long) in the Rietvlei Road road reserve and N2 road reserve (Item 6 in Figure 3).
- Outfall sewer (250mm diameter, approximately 445m long) in the N2 road reserve (Item 7 in Figure 3).

The proposed internal sewage network (160mm diameter uPVC gravity pipe network with round precast concrete ring manholes) will drain towards a newly proposed foul sewer pumpstation on the northern boundary of the property.

Water Network: The proposed development will be accommodated in the Goose Valley reservoir zone. Water reticulation will be connected to an existing 75mm diameter pipe located north-west of the property in Rietvlei Road road reserve with a short section of this existing line to be replaced with a 110mm diameter pipe (approximately 220m long) in order to comply with the fire flow criteria (Item 1 in Figure 5).

The internal water reticulation system will be a metered network consisting of a combined domestic and fire water reticulation network (75mm diameter uPVC Class 12 potable water main). Provision will be made inside erf boundaries of every property for individual water meters (located 1m inside each erf boundary).

Civil Engineering Report compiled by Vita Consulting Engineers (October 2023) regarding water supply to the proposed development:

The bulk water system to the Goose Valley, Wittedrift and Matjiesfontein reservoirs is at capacity and should be upgraded according to the master plan before additional developments within the reservoir supply areas can be accommodated.

GLS Consulting provided the following temporary solution:

- *Installation of an 160mm bulk main off the existing 160mm distribution main in the N2 road reserve, up to the Goose Valley reservoir, which will free up an additional 860kl/day.*
- *There is sufficient capacity in this 860kl/day capacity to then accommodate multiple developments including Farm 444/38.*

The project engineer discussed this proposal with Bitou Municipality on 9 March 2023, who stated that they will accept/support the temporary solution on the following conditions:

- *Design, installation, etc. costs for the temporary solution will be the responsibility of the developer/developers and will not be deductible from the Augmentation Levee's.*
- *The temporary solution is not a permanent solution and Augmentation Levee's for Water and Sewage will be used towards the permanent solution.*
- *The proposed pro-rata contribution towards the temporary solution must be resolved between the developers of the different properties.*

- A Service Level Agreement must be drafted for the development.

Preferred route for required pipeline upgrades to Goose Valley Reservoir:

The preferred route for the 160mm link pipeline off the existing 160mm distribution main in the N2 road reserve to the Goose Valley reservoir, follows the existing gravel road traversing Portion 72 of Farm 444 and Portion 74 of Farm 444 (Figure 7 and Figure 8) and the proposal is to lay the pipeline on the surface and cover it with rocks for additional protection.

The total length of the preferred pipeline route is approximately 940m. This route is preferred to the route following the existing servitude as it will not result in the unnecessary removal of vegetation. Therefor it is more desirable from an environmental perspective. It is noted that should the Municipality in future (for the permanent solution) elect a different route, there may be cost implications for the developers to re-route accordingly and/or such a permanent route may require stand-alone prior Environmental Authorisation.

12.	In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K.
-----	--

'Need', as defined by DEA&DP, refers to the timing of the proposal and the 'Desirability' refers to the 'placing' of the proposed development.

Need:

The proposed development is in line with all the provincial, district and local development policies. The timing is correct for this development as it will:

- Create employment opportunities during the construction and operational phases;
- Contribute to the economic growth of Plettenberg Bay.
- Increase the holistic financial sustainability of Bitou Municipality.
- Support the management objectives of the Keurbooms Estuarine Management Plan.

Please also refer to Section E) 4.1., 4.2. and 4.3. for additional information regarding the need for the proposed development.

Desirability:

The proposal is regarded as desirable because the proposed development:

- Is unlikely to impact negatively on existing land use rights of neighbouring property owners.
- It will not prevent any surrounding owner to exercise their legal land use rights.
- Will create employment opportunities during the construction and operational phase.
- It will optimise vacant land in an urban setting.
- It will support the management objectives of the Keurbooms-Bitou Estuarine Management Plan (K-BEMP).
- The development can be linked to Municipal services will limited upgrades to services.

Please also refer to Section E) 4.1., 4.2. and 4.3. for additional information regarding the need for the proposed development.

Questions to be engaged with when considering need & desirability:

1. How will this development impact the ecological integrity of the area?

The development will avoid all critical biodiversity areas. The proposed development site is not located in a high-risk area such as areas affected by flood lines and steep slopes. The preferred alternative for the proposed development avoids all sensitive habitat areas.

Ecological fire no longer forms part of the processes necessary to maintain a natural fynbos habitat. The lack of fire and the establishment of alien invasive vegetation along with historical grazing have

caused a loss of historically occurring fynbos in this area. The fynbos currently present on the proposed development site is in poor condition and it appears that from species composition and structure to be either secondary or degraded.

The proposed development will support and adhere to the management objectives of the Keurbooms-Bitou Estuarine Management Plan as well as the Integrated Coastal Management Act.

The proposed development will prevent any pollution runoff into the adjacent estuarine habitat.

2. How will this development enhance ecosystems and/or result in the loss or protection of biological diversity? What measures were explored to avoid negative impacts and enhance positive impacts?

The proposed development will be limited to disturbed vegetation. Avoidance mitigation will be applied to the eastern portion of the property (highly sensitive estuarine habitat). The estuarine functional zone will be preserved/maintained in a natural state.

- The preferred development layout avoids the removal of sensitive indigenous vegetation such as Goukamma Dune Thicket in the eastern portion of the property.
- The preferred development layout avoids highly sensitive biodiversity areas such as the estuarine habitat delineated by the aquatic specialist.
- A 33m aquatic buffer will be adhered to around the estuarine habitat as delineated by the aquatic specialist.
- Stormwater attenuation will take place on site to reduce the risk of influencing the surrounding estuarine habitat.
- The proposed development will prevent any pollution runoff into the adjacent estuarine habitat from unlawfully dump/infill material by developing a perimeter fence.

3. How will this development pollute and/or degrade the biophysical environment? What measures were explored to avoid or minimise these impacts?

The proposed development will not pollute and/or degrade the biophysical environment. The following measures were explored to avoid or minimise pollution/degradation impacts:

- All No-Go areas/biodiversity sensitive areas will be avoided during construction.
- Construction vehicles will be limited to the predetermined access route of the proposed development site.
- A 33m aquatic buffer around delineated estuarine habitat will be adhered to.
- The proposed development will prevent any pollution runoff into the adjacent estuarine habitat from unlawfully dump/infill material.
- Stormwater attenuation will take place on site to reduce the risk of influencing the surrounding estuarine habitat.
- All general construction waste/rubble which will be removed to the local municipal waste site for building rubble or alternatively the material can be re-used in the construction phase where fill material is required.
- Construction phase will be monitored by an environmental control officer (ECO).

4. What waste will be generated by this development? Measures to avoid waste?

General construction waste during the development phase of the proposed project. Waste produced during construction will be collected and removed by appointed contractors to a registered waste management facility (records must be kept and provided to the environmental control officer for auditing purposes). Alternatively, the material can be re-used in the construction phase where fill material is required.

General household/domestic waste will be generated during the operational phase (approximately 20kg of solid waste per household per week) of the proposed development, with

the homeowner association administrating the collection at each residential unit. Recycled waste to be collected by a registered Bitou Municipality service provider.

5. How will this development use and/or impact on non-renewable resources?

The proposed development will make use of municipal services regarding water and electricity.

Non-treated water must be utilised for construction so as to conserve potable water.

6. How will the ecological impacts resulting from this development, have an impact on people's environmental right in terms of the following:

Negative impact:

- Temporary noise during construction – refer to EMPr for mitigation measures.
- Temporary construction traffic associated with the development phase.
- Development of a new structure(s) within the landscape.

Positive impacts:

- Optimise vacant land.
- Employment opportunities during construction and operational phases.
- Preserving/maintaining the riparian area of the Keurbooms Estuary.

Socio-economic impacts:

- Change in character and sense-of-place from an open property to a lifestyle village with residential units.
- Employment opportunities during the construction and operational phases.
- Increase the holistic financial sustainability of Bitou Municipality.

Positive and negative ecological impacts:

- Result in limited loss of vegetation.
- Sensitive estuarine habitat will be avoided.
- Continuous management of alien invasive vegetation on Portion 38 of Farm Ganse Vallei 444.

7. What is the socio-economic context of the area?

- Please refer to Section G(8) in this Pre-Application Draft Basic Assessment Report.

SECTION F: PUBLIC PARTICIPATION

The Public Participation Process ("PPP") must fulfil the requirements as outlined in the NEMA EIA Regulations and must be attached as Appendix F. Please note that If the NEM: WA and/or the NEM: AQA is applicable to the proposed development, an advertisement must be placed in at least two newspapers.

1. Exclusively for linear activities: Indicate what PPP was agreed to by the competent authority. Include proof of this agreement in Appendix E22.

Linear activities include upgrade of the existing water line, a section of new sewage line and a section of new water link line up to the Goose Valley reservoir.

2. Confirm that the PPP as indicated in the application form has been complied with. All the PPP must be included in Appendix F.

Please refer to Appendix F for copies of advert, site notices, notifications & stakeholder register. The report will be updated with comments received once the comment period on the Pre-App DBAR ends.

- Neighbouring property owners were identified using CapeFarmMapper.
- Select neighbouring property owners were compiled into a list sent to the Bitou Municipality for confirmation of contact details in terms of the POPIA.
- Key Authorities were identified according to whether or not they have a mandated interest in the area/site.
- Local Councillor was verified with the Bitou Municipality.
- Site Notices were placed on site calling for I&APs to register and review the Pre-App DBAR.
- Written notifications were sent to all potential I&APs via email/post informing of the availability of the Pre-App DBAR and the opportunity to register as an I&AP.
- Advert appeared in the *Knysna-Plett Herald* on 22 February 2024 for I&APs to register and submit comment on the Pre-App DBAR.

Comments received in response to the Pre-App DBAR or in request to be registered will be considered and added to the Stakeholder Register and all submissions will be incorporated and reflected in the Final Basic Assessment Report.

3. Confirm which of the State Departments and Organs of State indicated in the Notice of Intent/application form were consulted with.

The following State Departments and Organs of State were consulted with:

- Bitou Municipality
- Department of Transport and Public Works – Provincial
- Provincial Roads
- SANRAL
- DEA&DP Coastal Management
- Department of Fisheries, Forestry and the Environment (DFFE)
- Department of Agriculture
- CapeNature
- Garden Route District Municipality
- Breede-Olifants Catchment Management Agency (BOCMA)
- Department of Health
- SACAA
- Heritage Western Cape

4. If any of the State Departments and Organs of State were not consulted, indicate which and why.

Department of Defence – The development will pose no threat to military or defence forces of South Africa. The site is not situated near any military facilities. The EAP is of the opinion that the theme is not applicable to this application. Since there is no provision in the Protocols for 'not applicable' the lowest possible rating level of Low remains. **There are no reasonable grounds to conduct any specialists' studies to affirm this and further consultation with Department of Defence is not necessary.**

5. if any of the State Departments and Organs of State did not respond, indicate which.

To be updated in the Draft and Final Basic Assessment Reports following the outcome of engagement and public participation in response to the different versions of the BAR.

- 6. Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues were incorporated into the development proposal.

To be updated in the Draft and Final Basic Assessment Reports following the outcome of engagement and public participation in response to the different versions of the BAR.

Note:

A register of all the I&AP's notified, including the Organs of State, and all the registered I&APs must be included in Appendix F. The register must be maintained and made available to any person requesting access to the register in writing.

The EAP must notify I&AP's that all information submitted by I&AP's becomes public information.

Your attention is drawn to Regulation 40 (3) of the NEMA EIA Regulations which states that "*Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but **must** be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority.*"

All the comments received from I&APs on the pre -application BAR (if applicable and the draft BAR must be recorded, responded to and included in the Comments and Responses Report and must be included in Appendix F.

All information obtained during the PPP (the minutes of any meetings held by the EAP with I&APs and other role players wherein the views of the participants are recorded) and must be included in Appendix F.

Please note that proof of the PPP conducted must be included in Appendix F. In terms of the required "proof" the following is required:

- a site map showing where the site notice was displayed, dated photographs showing the notice displayed on site and a copy of the text displayed on the notice;
- in terms of the written notices given, a copy of the written notice sent, as well as:
 - if registered mail was sent, a list of the registered mail sent (showing the registered mail number, the name of the person the mail was sent to, the address of the person and the date the registered mail was sent);
 - if normal mail was sent, a list of the mail sent (showing the name of the person the mail was sent to, the address of the person, the date the mail was sent, and the signature of the post office worker or the post office stamp indicating that the letter was sent);
 - if a facsimile was sent, a copy of the facsimile Report;
 - if an electronic mail was sent, a copy of the electronic mail sent; and
 - if a "mail drop" was done, a signed register of "mail drops" received (showing the name of the person the notice was handed to, the address of the person, the date, and the signature of the person); and
- a copy of the newspaper advertisement ("newspaper clipping") that was placed, indicating the name of the newspaper and date of publication (of such quality that the wording in the advertisement is legible).

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. GROUNDWATER

1.1.	Was a specialist study conducted?	YES	NO
1.2.	Provide the name and or company who conducted the specialist study.		
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.		

2. SURFACE WATER

2.1.	Was a specialist study conducted?	YES	NO
2.2.	Provide the name and/or company who conducted the specialist study.		
Dr J.M. Dabrowski (Confluent Consulting)			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		
<p>Portion 38 of Farm Ganse Valleï 444 is situated within sub-quatarnary catchment (SQC) 9188. According to the National Freshwater Ecosystem Priority Atlas (NFEPA), SQC 9188 has been classified as a Freshwater Ecosystem Priority Area (FEPA). However, the footprint of the development is not located within any aquatic features.</p> <p>The Keurbooms Estuary is located directly to the east of the proposed development property (Figure 12). The section of the estuary situated adjacent to the proposed development site is supra-tidal salt marsh dominated by <i>Juncus kraussi</i>.</p> <p>Vegetation present between the edge of the Keurbooms Estuary and the eastern most row of proposed residential units consist of dense thicket vegetation (designated Goukamma Dune Thicket), which forms a buffer between the proposed development and the estuary. This vegetation may not be removed.</p> <p>Based on the characteristics of the area identified during desktop studies and site inspections, an appropriate buffer of 33m will be adhered to from the edge of the estuary (Figure 12). The current site development plan makes provision for approximately 45m between the edge of the estuary and the closest proposed residential unit which is deemed sufficient for the purpose of protecting the estuarine habitat.</p> <p>Any development that occurs within the proposed 33m buffer zone will be considered as Very High sensitivity and is therefore not supported. Development that occurs outside the 33m buffer zone is considered as Low sensitivity.</p> <p>The proposed development footprint falls entirely outside the 33m buffer zone.</p> <p>Due to the location of the proposed development site in the FEPA, the following consideration should be taken into account to ensure that stormwater is managed according to the Sustainable Drainage System (SuDS) principles:</p> <ul style="list-style-type: none"> • Stormwater must not be discharged directly into the estuary. • Rainwater harvest tanks must be installed at the proposed residential units as well as communal buildings to reduce water entering the stormwater system. • Make use of swales and retention ponds to attenuate stormwater runoff on site. This will increase infiltration and reduce the speed and volume of stormwater runoff discharged from the proposed development site. • Make use of permeable paving to promote infiltration into the soil. • Make use of retention ponds and artificial wetlands to capture stormwater runoff. <p>The buffer zone is located on steep slopes which will be vulnerable to erosion during site clearance. The following recommendations are made as erosion control measures:</p> <ul style="list-style-type: none"> • Ensure that construction activities do not cause any preferential flow paths and concentrated surface runoff. • Demarcate the construction area. This will ensure that construction vehicles do not compact soil or disturb any vegetation within the buffer zone. • To reduce the transport of sediment, make use of silt fences and biodegradable coir logs which can be placed along contours. 			

- Vegetation clearing should be done in parallel with the construction progress. This will minimize erosion and runoff.
- Revegetate exposed areas once construction has been completed.
- Stormwater runoff that is generated by hardened surfaces should be discharged in retention areas such as swales and retention ponds. This will reduced concentrated runoff and erosion.

The Keurbooms Estuary is not defined as a watercourse and therefore the proposed development will not be within the regulated area of a watercourse. Consequently, **no water use authorisation is required.**



Figure 12: Delineated estuary with 33m buffer zone.

3. COASTAL ENVIRONMENT

3.1.	Was a specialist study conducted?	YES	NO
3.2.	Provide the name and/or company who conducted the specialist study.		
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
<p>Considerations regarding the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"):</p> <ul style="list-style-type: none"> • Whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and protecting those areas. <ul style="list-style-type: none"> ○ The proposed development is not located in coastal public property and will have no affect on surrounding coastal public properties. ○ Portion 38 of Farm Ganse Vallei 444 is not designated as coastal access land. ○ The proposed development site is partially located in the Coastal Protection Zone. However, development will be limited to already disturbed, elevated areas while preserving/maintaining the remaining coastal habitat and coastal processes towards the estuary (eastern portion of property) (Figure 11). • Socio-Economic impact if the activity is authorised / not authorised. 			

- If the proposed development is authorised, it will have the following impacts relating to socio-economics:
 - Create temporary and permanent employment opportunities during construction and operational phase.
 - Preserve and maintain the riparian zone in the eastern portion of the proposed development site.
 - Optimise vacant land in an urban setting, therefore increasing the holistic financial sustainability of Bitou Municipality.
 - Meet the management objectives of the Keurbooms-Bitou Estuarine Management Plan.
- If the proposed development is not authorised, it will have the following impacts relating to socio-economics:
 - Property remains vacant and will therefore not increase the holistic financial sustainability of Bitou Municipality.
 - Property will not be maintained in such a way as to support the management objectives of the Keurbooms-Bitou Estuarine Management Plan.
 - No employment opportunities will be created for the local community of Bitou Municipality.
- The likely impact of the proposed activity on the coastal environment, including the cumulative effect of its impact together with those of existing activities.
 - The proposed development will be limited to already disturbed areas on Portion 38 of Farm Ganse Valleï 444, therefore applying avoidance mitigation to the riparian zone. An environmental management plan will be adhered to for the proposed development which will aim to preserve/maintain the natural coastal environment.
- The likely impact of coastal environmental processes on the proposed activity.
 - The proposed development will not be affected by coastal processes such as wave, current and wind action, erosion, accretion, sea-level rise, storm surges and flooding. The eastern portion of the proposed development site will be maintained in its natural state which will provide a sizeable buffer between the development activities and the Keurbooms Estuary.

It is evident from the considerations regarding the **NEM:ICMA** mentioned above, that the proposed development will not prejudice the achievement of any coastal management objectives and is not in contrary to the interests of the surrounding community. The proposed development will not cause irreversible or long-lasting adverse affects to any aspect of the coastal environment. The proposed development will not deny the public access to the coastal environment.

3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.
------	---

The estuarine management plans, coastal management programmes and coastal management objectives applicable in the area:

- The Keurbooms Estuary is of high conservation value and in terms of the management objectives, the Keurbooms-Bitou Estuarine Management Plan (K-BEMP) stipulates that formal protections mechanisms to obtain conservation status for land parcels within or spanning the estuarine functional zone (EFZ) must be investigated. The following guidelines are provided in the K-BEMP and are relevant to the proposed land-use and infrastructure:
 - *Planning should allow for the maintenance of a riparian zone along the length of the estuary where sensitive habitats (wetlands, supratidal saltmarshes and indigenous vegetation) occur.* The implementation of the coastal management lines (CML), coastal protection zones (CPZ), flood lines and the inclusion of CBA's within all planning schemes will allow for compliance with this guideline. The proposed

<p>development layout will allow for the maintenance/preservation of the riparian zone located in the eastern portion of Portion 38 of Farm Ganse Valleï 444.</p> <ul style="list-style-type: none"> ○ <i>Development and land use in the catchment and estuarine area should not lower water quality or interfere with normal hydrodynamic or sedimentary process and cycles.</i> The proposed development will not discharge any effluent water in the estuarine area and will therefore not alter the water quality. 	
3.5.	<p>Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.</p> <ul style="list-style-type: none"> • The proposed development is not located in coastal public property and will have no affect on surrounding coastal public properties. • Portion 38 of Farm Ganse Valleï 444 is not designated as coastal access land. • The proposed development site is partially located in the Coastal Protection Zone. However, development will be limited to already disturbed areas while preserving/maintaining the remaining coastal habitat (eastern portion of property) (Figure 11). • The proposed development will adhere to a 33m buffer zone around the delineated estuary (Confluent Consulting, 2023).

4. BIODIVERSITY

4.1.	Were specialist studies conducted?	YES	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		
Dr David Hoare (David Hoare Consulting (Pty) Ltd).			
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		
<p>The following sources of information was used to undertake biodiversity assessments (extract from Terrestrial Biodiversity Impact Assessment, Botanical Compliance Statement and Faunal Compliance Statement undertaken by Dr David Hoare and Dr Wynand Vlok) (Appendix G2, G3 and G4):</p> <p>Terrestrial Biodiversity Impact Assessment:</p> <ul style="list-style-type: none"> • Regional Vegetation: <ul style="list-style-type: none"> ○ Broad vegetation types occurring on site were obtained from Mucina and Rutherford (2006), with updates according to the SANBI BGIS website (http://bgis.sanbi.org), as follows: <ul style="list-style-type: none"> ▪ Mucina, L. and Rutherford, M.C. (editors) 2006. Vegetation map of South Africa, Lesotho and Swaziland: an illustrated guide. Strelitzia 19, South African National Biodiversity Institute, Pretoria. ▪ South African National Biodiversity Institute 2018 Final Vegetation Map of South Africa, Lesotho and Swaziland [Vector] 2018. Available from the Biodiversity GIS website, downloaded on 23 September 2021. • Threatened Ecosystems: <ul style="list-style-type: none"> ○ The conservation status of the vegetation types were obtained from Mucina and Rutherford (2006) and the National List of Ecosystems that are Threatened and in need of protection (GN1002 of 2011), published under the National Environmental Management: Biodiversity Act (Act No. 10, 2004). ○ The plant species checklist of species that could potentially occur on site was compiled from a plant species checklist extracted from the NewPosa database of the South African National biodiversity Institute (SANBI) for the quarter degree grids 3422AA. 			

- The IUCN Red List Category for plant species, as well as supplementary information on habitats and distribution, was obtained from the SANBI Threatened Species Programme (Red List of South African Plants, <http://redlist.sanbi.org>).
- Regional plans:
 - Information from the National Protected Areas Expansion Strategy (NPAES) was consulted for possible inclusion of the site into a protected area in future (available on <http://bgis.sanbi.org>).
 - The 2017 Western Cape Biodiversity Spatial Plan (WCBSBP) Maps were consulted for inclusion of any parts of the site into any Critical Biodiversity Areas or Ecological Support Areas (CapeNature. 2017 WCBSBP Mossel Bay [Vector] 2017. Available from the Biodiversity GIS website (biodiversityadvisor.sanbi.org)).

Botanical Compliance Statement:

- Vegetation and Plant Species:
 - Plant species that could potentially occur on in the general area was extracted from the NewPosa database of the South African National biodiversity Institute (SANBI) for the quarter degree grid/s in which the site is located.
 - The IUCN Red List Category for plant species, as well as supplementary information on habitats and distribution, was obtained from the SANBI Threatened Species Programme (Red List of South African Plants, <http://redlist.sanbi.org>).
 - Lists were compiled specifically for any species at risk of extinction (Red List species) previously recorded in the area. Historical occurrences of threatened plant species were obtained from the South African National Biodiversity Institute (<http://posa.sanbi.org>) for the quarter degree square/s within which the study area is situated. Habitat information for each species was obtained from various published sources. The probability of finding any of these species was then assessed by comparing the habitat requirements with those habitats that were found, during the field survey of the site, to occur there.
 - Regulations published for the National Forests Act (Act 84 of 1998) (NFA) as amended, provide a list of protected tree species for South Africa. The species on this list were assessed in order to determine which protected tree species have a geographical distribution that coincides with the study area and habitat requirements that may be met by available habitat in the study area. The distribution of species on this list were obtained from published sources (e.g. van Wyk & van Wyk 1997) and from the SANBI Biodiversity Information System website (<http://sibis.sanbi.org/>) for quarter degree grids in which species have been previously recorded. Species that have been recorded anywhere in proximity to the site (within 100 km), or where it is considered possible that they could occur there, were listed and were considered as being at risk of occurring there.

Although mapped as Garden Route Shale Fynbos (EN) the remaining fynbos on the elevated portion of the site where the development is proposed is moribund, invaded by several alien invasive species, and has relatively low species richness. Based on the species analysis the botanist confirms that the remaining fynbos has poor species richness and composition which is not normal for intact healthy fynbos. This suggests that the fynbos is old secondary fynbos (lack of fire maintenance), whilst being chronically disturbed for an extended period of time through grazing and nutrification (manure).

According to the botanist, the national vegetation map is not mapped at a fine scale and the on-site patterns do not necessarily match the vegetation type description.

Although there are several plant species listed in the Screening Tool report that have a medium probability of occurring on site (based on distribution and habitat requirements) the botanical

specialist did not found these species. Thus the habitats have been given a Site Ecological Importance score of Medium

Faunal Compliance Statement:

- Fauna:
 - Lists of animal species that have a geographical range that includes the study area were obtained from literature sources (Bates et al., 2014 for reptiles, du Preez & Carruthers 2009 for frogs, Mills & Hes 1997 and Friedmann and Daly, 2004 for mammals). This was supplemented with information from the Animal Demography Unit website (adu.uct.ac.za) and literature searches for specific animals, where necessary.
 - Appendix 2 (of Faunal Compliance Statement) is a summary (for the QDS3422AA) of amphibians, mammals and reptiles that may occur on the study site.

4.4.	Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.
------	---

The eastern portion of Portion 38 of Farm Ganse Vallei Farm 444 is located in a designated Critical Biodiversity Area, specifically a estuary area (Figure 10). A very small portion of the property contains designated Ecological Support Areas, specifically ESA2 (restore from other land use). No development is proposed in the critical biodiversity areas.

Critical Biodiversity Area 1

Definition: Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.

Objective: Maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.

Critical Biodiversity Area 2

Definition: Areas in a degraded or secondary condition. Required to meet biodiversity targets for species, ecosystems or ecological processes and infrastructure.

Objective: Maintain in a functional, natural or near-natural state, with no further loss of habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.

Ecological Support Area 2

Definition: Not essential for meeting biodiversity targets. Important in supporting functioning of PAs or CBAs. Often vital for ecosystem services.

Objective: Restore/minimise impact on ecological infrastructure functioning, especially soil and water-related services.

Proposal: The proposed development does not include any infrastructure in the eastern portion of the development property that is located in a designated Critical Biodiversity Area. All development will be focussed on the western portion of the property that is already disturbed due to historical grazing, the exclusion of burning regimes to maintain fynbos habitat as well as the spread of alien vegetation species.

4.5.	Explain what impact the proposed development will have on the site specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development.
------	--

According to the SANBI Red List of Ecosystems map, the proposed development site consists of Garden Route Shale Fynbos (Endangered) in the western portion of the property as well as Goukamma Dune Thicket (Least Concern) in the western and eastern portion of the property.



Figure 13: SANBI Red List of Ecosystems map in relation to the proposed development site (CapeFarmMapper, 2023).

Terrestrial Biodiversity Impact Assessment (David Hoare Consulting): The Terrestrial Biodiversity Impact Assessment stipulated the following:

- Estuarine habitats on site (eastern portion of the property) are sensitive and must be avoided.
 - The proposed development applies total avoidance of the eastern portion of the property and all infrastructure is proposed on the western portion that is already disturbed/degraded.
- Mesic Thicket habitat on the sea-facing slope is sensitive. The Mesic Thicket forms an essential buffer between estuarine and terrestrial ecosystems.
 - No development is proposed in the identified Mesic Thicket habitat.
- The fynbos that is present on site, is in poor condition. The poor condition of the fynbos could be as a result of long-term degradation and it is deemed secondary.
 - The preferred site alternative was identified considering the overall site sensitivity of Portion 38 of Farm Ganse Valleï 444. The preferred area on the property is already disturbed by historical grazing activities. The prolonged exclusion of burning contributed to the disappearance of Garden Route Shale Fynbos vegetation. The vegetation is no longer representative of the endangered fynbos species and rather of secondary grassy fynbos.

The habitats on Portion 38 of Farm Ganse Valleï that has the highest sensitivity and ecological value are excluded from the proposed development footprint.

Botanical Compliance Statement (David Hoare Consulting): The Botanical Compliance Statement Stipulated the following:

- No plant species of concern were identified on site.
- The estuarine habitat (eastern portion of the property) is a known habitat for *Zostera capensis* (Least Concern). This species is ecologically important and listed as a sensitive species. The estuarine habitat have a Site Ecological Importance of Very High:

- No development is proposed in the identified estuarine habitat (eastern portion of the property).
- Two protected tree species were identified on site namely *Pittosporum viridiflorum* and *Sideroxylon inerme*. The exact location of the protected trees were marked with GPS coordinates.
 - The site development plan was amended to avoid all the identified protected tree species (Figure 14).

It is noted that time lapse from when the protected tree survey is undertaken, to inform the environmental/planning applications, till implementation, could be a number of years during which time germination of more protected tree species may occur and/or surveyed trees would have grown larger/died off. It is therefore a recommendation that the actual footprints of each unit be checked prior to final construction. The current layout will not however result in the removal of protected trees. Should trimming or relocation of younger trees be required the Applicant must apply for the necessary Forestry Permit in terms of the Act.



Figure 14: Protected tree survey (David Hoare Consulting).

4.6. If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.

The proposed development is not located in a protected area.

4.7. Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.

Faunal Compliance Statement (David Hoare Consulting): The Faunal Compliance Statement stipulated the following:

- The proposed development site is not considered to a suitable or critical habitat for any of the animal species identified in the Screening Tool Report.
- Areas outside the development footprint that have a Very High Site Ecological Importance will not be affected by the proposed development.

- The eastern portion of the proposed development site containing thicket have a moderate to high probability of the Knysna Warbler (Vulnerable) to occur, however, no development is proposed in the eastern portion of the property.
 - The Crowned Eagle (Near Threatened) is unlikely to occur on the proposed development site even though the Mesic Thicket in the eastern portion of the property may constitute part of their general foraging range.
 - Small antelope species could potentially find a suitable habitat in the Mesic Thicket in the eastern portion of the property. However, due to landscape connectivity issues, the small antelope species are unlikely to be present.
- It is verified that the Animal Species Theme has a Medium sensitivity for the proposed development site.

5. GEOGRAPHICAL ASPECTS

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.

No geographical aspects will be affected.

6. HERITAGE RESOURCES

6.1.	Was a specialist study conducted?	YES	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
Stefan de Kock (Perception Planning).			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
<p>During 2009, a NID application in relation to the proposed development of a boutique hotel on Portion 38 of Farm Ganse Vallei 444 was submitted to HWC by Perception Planning on behalf of the previous landowner. In response to the NID submission, HWC required that an Archaeological Impact Assessment (AIA) & Desktop Palaeontology Impact Study (PIA) be undertaken. No development took place after the 2009 NID application.</p> <p>A new Notice of Intent to develop has been submitted to Heritage Western Cape on 19 October 2022. HWC, in their response to the 2022 NID, confirmed that an Integrated Heritage Impact Assessment is required due to the presence of two potential burial sites.</p> <p>The two potential burial sites were investigated during the 2022 Archaeological Impact Assessment which led to the following observations:</p> <ul style="list-style-type: none"> • No evidence of any pre-colonial or colonial period archaeology on the property. • Slight possibility of archaeological material under the dune which covers the southern portion of the property. • The two stone features consist of quartzite cobbles which are small in size and overgrown with indigenous brush (4m apart). • Similar quartzite cobbles are distributed throughout the area in the undergrowth next to Rietvlei Road and the pathways leading to the estuary. • The quartzite cobbles are part of an old beach terrace. • It cannot be confirmed whether the stone features represent burial sites. <p>The Committee approved the HIA compiled by Perception Planning dated March 2023 with the following conditions (Appendix E1):</p> <ul style="list-style-type: none"> • A 5m buffer must be adhered to around the two stone features which must also be fenced during earth moving activities. 			

- An archaeologist must be on site to monitor earth moving activities. If any human remains or significant archaeological materials are exposed during development activities, the find should be protected from further disturbance and work in the immediate area should be halted and Heritage Western Cape must be notified immediately.

7. HISTORICAL AND CULTURAL ASPECTS

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.

No historical and cultural aspects will be affected.

8. SOCIO/ECONOMIC ASPECTS

8.1. Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.

Surrounding properties area characterised by a variety of rural residential, tourist and commercial associated uses while areas located east of the N2 National Road are characterised by group housing developments (private residential estate developments) which are managed by homeowners associations.

Private residential properties in the area are associated with the high-end income bracket. Properties are of reasonable size, mostly with large homes. Redevelopment in the area see older houses being renovated and/or modified often.

The area is fully serviced and Municipality services are well maintained with a high level of service delivery. Road infrastructure is of good condition and maintenance done when required.

Due to the proximity of the various coastal suburbs that make up this Plettenberg Bay-Keurbooms area, the area offers both permanent as well as semi-permanent accommodation through short-term rental, as well as ownership.

Residents in the area are mostly well-educated, highly qualified and either employed or retired. There is a school in the surrounding area (Plettenberg Bay Primary), and access to the beach and estuary makes it a popular area for walking/hiking and cycling.

8.2. Explain the socio-economic value/contribution of the proposed development.

Development of a lifestyle village, in this particular area is unlikely to deter from the character/value of the greater area.

The proposed development will contribute to the socio-economic value of Bitou Municipality in the following ways:

- Create temporary employment opportunities during pre-construction and construction phase.
- Create employment opportunities during operational phase.
- Create temporary employment opportunities for contractors, small businesses and suppliers during construction and operational phases.
- Increase in the attraction of Bitou Municipality.
- Improve the holistic financial sustainability of the local municipality due to additional rates and taxes being generated.

8.3. Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.

The development is proposed as a private development. The 'community' in which the site is located is not characterised as impoverished and it is unlikely that community upliftment (projects) is required.

8.4.	Explain whether the proposed development will impact on people’s health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development.
<p>Pre-construction and Construction Phase:</p> <ul style="list-style-type: none"> Minimal noise impact – construction activities will be limited to normal working hours (07:00 – 18:00) during weekdays and 07:00 – 13:00 on Saturdays with no activities to take place on Sundays and public holidays. No impact regarding odours. Minimal dust pollution – construction vehicle movement will be limited to the designated access routes and dust control measures will be put in place. <p>Operational Phase:</p> <ul style="list-style-type: none"> No noise impact. No impact regarding odours. Low impact regarding visual character and sense of place. 	

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. DETAILS OF THE ALTERNATIVES IDENTIFIED AND CONSIDERED

1.1.	Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred property and site alternative.	
The western portion of Portion 38 of Farm Ganse Valleï 444, Plettenberg Bay, Bitou Municipality.	
Provide a description of any other property and site alternatives investigated.	
No alternative properties or site alternatives were investigated for the proposed development.	
Provide a motivation for the preferred property and site alternative including the outcome of the site selection matrix.	
<p>The preferred site alternative was identified considering the overall site sensitivity of Portion 38 of Farm Ganse Valleï 444.</p> <p>The preferred area on the property is already disturbed as a result of historical transformation, landscaping, development and agricultural activities.</p> <p>The prolonged exclusion of burning (of fynbos) contributed to the transformation of Garden Route Shale Fynbos vegetation. The vegetation is no longer deemed to be representative of the endangered fynbos species and rather of secondary/degraded grassy fynbos.</p> <p>The preferred site alternative avoids the delineated estuary habitat in the eastern portion of the property, therefore preserving/maintaining the highly sensitive riparian area of the Keurbooms Estuary.</p>	
Provide a full description of the process followed to reach the preferred alternative within the site.	
<p>An aquatic specialist was appointed by the applicant to assist with the delineation of the estuary habitat on the eastern side of the property. This estuary delineation was captured in a spatial layer that was used to inform the location of the proposed development with a setback of 33m.</p> <p>Botanical/Biodiversity specialists were appointed to map the habitat sensitivity of the remaining fynbos, thicket vegetation. An overlay was compiled of the various sensitivity areas identified by the specialists which was used to inform the preferred site development layout.</p>	

Protected tree survey informed the placement of residential units in order to avoid all GPS marked trees.

Other specialist studies were undertaken including heritage (including palaeontology and archaeology), to determine the site location that would have the lowest impact on the cultural and biophysical environment.

The information gathered was used by the Architect and Urban Planner to compile a site development plan presented herewith as the preferred alternative.

The overall density (number of units) have subsequently been reduced and the placement of units (especially towards the location of protected tree species) are such that these trees will be avoided.

Provide a detailed motivation if no property and site alternatives were considered.

Site selection is determined by ownership and therefore no other property was available for consideration by the applicant.

List the positive and negative impacts that the property and site alternatives will have on the environment.

Positive Impacts:

- Development will be focused on the already disturbed portion of Portion 38 of Farm Ganse Vallei 444 with less dense/sensitive vegetation compared to the remainder of the property in the lower lying, more sensitive thicket and estuarine habitat.
- Development will make use of existing municipal water, sewage, and electrical services.
- Development will manage alien invasive vegetation species.
- Development will maintain identified protected indigenous trees on the property.
- Development will create employment opportunities during construction and operational phases.
- Additional income to the local municipality through municipal rates and taxes.
- Improved maintenance/management of the riparian area of Keurbooms Estuary.

Negative Impacts:

- Permanent loss of ~3.17ha of secondary grassy fynbos.
- Fragmentation of intact habitat with the positioning of residential units in an otherwise natural environment.
- Additional pressure on non-renewable (municipal) resources such as water and electricity.
- Additional traffic in Rietvlei Road, especially during the peak holiday periods.
- Additional waste generation that must be accommodated through the Municipal waste disposal systems.
- Additional effluent that must be accommodated through the Municipal sewage processing systems.
- Temporary noise impact during pre-construction and construction phases.

1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
------	---

Provide a description of the preferred activity alternative.

Alternative 1 (Preferred):

The preferred activity alternative entails the following:

- **Twelve (12) x sectional title group housing units** (single storey), each with a double garage and two (2) additional parking bays. Each unit will cover ~655m² and will therefore calculate to **1.39 units per hectare** over the entire site.
- Entrance gate (from Rietvlei Road).
- Guard house.
- Maintenance and staff rooms.

- Communal areas (clubhouse, conference room, gym, pool, doctor/nurse office and admin office).
- Six (6) x visitor parking bays at the communal buildings / facilities.
- Internal access roads (5.5m wide). No development is proposed in the Open Space Zone III portion (~5.41 ha) and this area which encompass the Keurbooms Estuary will act as a private open space.
- Water pipeline infrastructure to connect to the existing Plettenberg Bay water system.
- Sewage pumpstation and associated pipeline infrastructure to connect to the existing Plettenberg Bay sewer system.

Provide a description of any other activity alternatives investigated.

The **No-Go alternative** (status quo) with no development of a lifestyle resort. Under this alternative, the current land use would continue with the primary rights of agriculture.

Provide a motivation for the preferred activity alternative.

Alternative 1 (Preferred):

Alternative 1 is the preferred activity due to the following aspects:

- The development will manage alien invasive vegetation species in the development footprint as well as in the sensitive estuarine habitat in the eastern portion of Portion 38 of Farm Ganse Vallei 444.
- The development will maintain identified protected tree species on the property.
- The development will create temporary employment opportunities during the construction and operational phases.
- The development will generate additional income to the local municipality through municipal rates and taxes.
- The development will improve maintenance/management of the riparian area of the Keurbooms Estuary.
- The development does not encroach beyond the property boundaries.
- Access can be obtained via existing road infrastructure.
- Development is restricted to areas that are already transformed.

Provide a detailed motivation if no activity alternatives exist.

The proposal is regarded as desirable because the proposed development:

- Is unlikely to impact negatively on existing land use rights of the neighbouring property owners.
- It will not prevent any surrounding owner to exercise their legal land use rights.
- It will create temporary employment opportunities during the construction and operational phases.
- It will optimise vacant land in an urban setting.
- It will contribute to the holistic financial sustainability of Bitou Municipality.
- It will support the management objectives of the Keurbooms-Bitou Estuarine Management Plan (K-BEMP).

List the positive and negative impacts that the activity alternatives will have on the environment.

Impact	No-Go Alternative	Alternative 1 (Preferred)
Positive	No vegetation will be disturbed. Habitat will remain intact. No fragmentation of ecosystem patterns/processes although a	Invasive alien vegetation will be managed better through designated management and levees that will be allocated for environmental management inclusive of invasive alien management in particular.

	<p>perimeter fence is already in place around the property.</p>	<p>Highly sensitive thicket and estuarine habitats will be avoided.</p> <p>Identified protected tree species will be avoided.</p> <p>Temporary employment opportunities will be created.</p> <p>Create an additional attraction and accommodation in an area that is popular amongst tourists.</p> <p>Additional rates and taxes will be generated for the Municipality.</p> <p>Support the management objectives of the K-BEMP.</p>
<p>Negative</p>	<p>Invasive alien vegetation will be less maintained since the area is not utilised by the residents/homeowners or visitors that generally obliges the owners/managers to keep invasive alien vegetation under control.</p> <p>No additional employment opportunities will be created.</p> <p>Property will remain vacant, and concern has been raised about land invasion.</p> <p>No addition attraction for Bitou Municipality.</p> <p>No additional rates and taxes will be generated towards Municipal income.</p>	<p>Permanent loss of ~3.17ha of vegetation.</p> <p>Fragmentation of intact habitat and ecosystem.</p> <p>Additional traffic especially during peak holiday periods in Rietvlei Road.</p> <p>Additional pressure on non-renewable resources of the local municipality.</p>

1.3. Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts

Provide a description of the preferred design or layout alternative.

Alternative 1 (Preferred):

The preferred design layout entails the following (Figure 15):

- **Twelve (12) x sectional title group housing units** (single storey), each with a double garage and two (2) additional parking bays. Each unit will cover ~655m² and will therefore calculate to **1.39 units per hectare** over the entire site.
- Entrance gate (from Rietvlei Road).
- Guard house.
- Maintenance and staff rooms.
- Communal areas (clubhouse, conference room, gym, pool, doctor/nurse office and admin office).
- Six (6) x visitor parking bays at the communal buildings / facilities.
- Internal access roads (5.5m wide). No development is proposed in the Open Space Zone III portion (~5.41ha) and this area which encompass the Keurbooms Estuary will act as a private open space.

- Water pipeline infrastructure to connect to the existing municipal water system.
- Sewage pumpstation (on-site) and associated pipeline infrastructure to connect to the existing municipal sewer system.

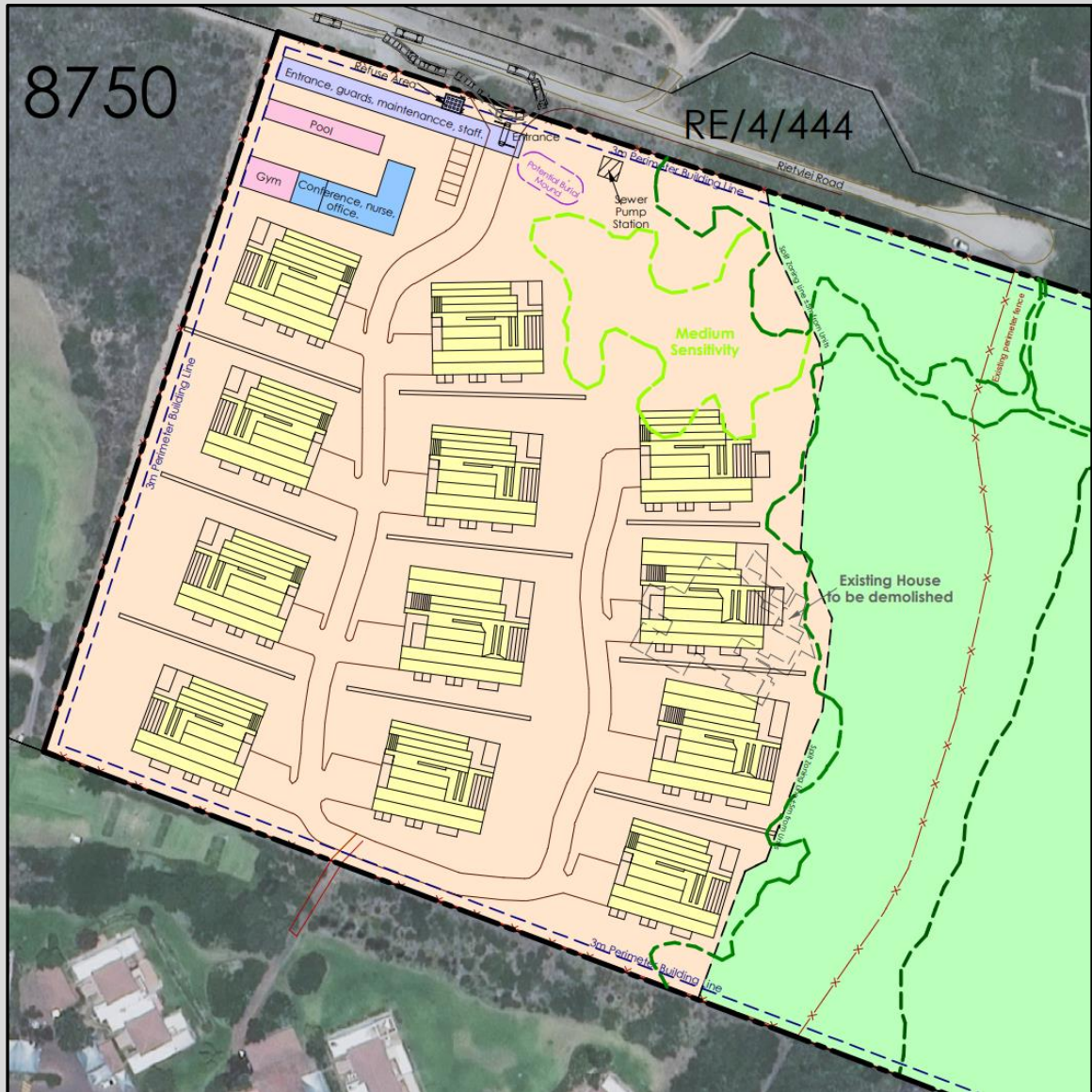


Figure 15: Site development plan (preferred alternative).

Provide a description of any other design or layout alternatives investigated.

Alternative 2 (not preferred and not deemed feasible to the impact hierarchy approach):

Alternative 2 (Figure 16) entails the same development components, but with 17 x single housing units. The increase in housing units results in a slightly different layout which will encroach into identified sensitive areas on the site.

This alternative layout does not take into account the presence of the potential graves identified in the archaeological impact assessment as well as the location of protected tree species on the property. This alternative was proposed prior to input obtained from respective specialist, but have since been eliminated and is therefore not considered desirable.



Figure 16: Original site development plan.

Provide a motivation for the preferred design or layout alternative.

The preferred design layout alternative was specifically designed to avoid the delineated thicket and estuary habitat in the eastern portion of the property. Development will be limited to the already disturbed portions of the property.

The preferred design layout allows for a 33m estuary habitat buffer to be adhered to and therefore contributing to the objectives of the K-BEMP.

The preferred design layout avoids all identified protected tree species, thicket and protected trees.

Provide a detailed motivation if no design or layout alternatives exist.

List the positive and negative impacts that the design alternatives will have on the environment.

Impact	Alternative 1 (Preferred)	Alternative 2 (Not Preferred)
Positive	Avoid protected indigenous tree species. Allows for a 33m buffer on the delineated estuary habitat. Contributes to the management objectives of the K-BEMP.	

	In line with the management objectives of the Western Cape Biodiversity Spatial Development Framework for CBA areas. Allows for a 5m buffer around potential identified graves.	
Negative	Permanent loss of ~3.17ha of vegetation.	Does not take the location of identified protected tree species into account. Permanent loss of vegetation. Does not take the location of potential graves into account. Development will take place within sensitive thicket and estuarine habitats identified by specialist studies.
1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.	
Provide a description of the preferred technology alternative:		
Provide a description of any other technology alternatives investigated.		
Provide a motivation for the preferred technology alternative.		
Provide a detailed motivation if no alternatives exist.		
List the positive and negative impacts that the technology alternatives will have on the environment.		
1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.	
Provide a description of the preferred operational alternative.		
Please also refer to Section 1.2 and 1.3 under 'Alternatives'.		
Provide a description of any other operational alternatives investigated.		
Provide a motivation for the preferred operational alternative.		
Provide a detailed motivation if no alternatives exist.		
List the positive and negative impacts that the operational alternatives will have on the environment.		
1.6.	The option of not implementing the activity (the 'No-Go' Option).	
Provide an explanation as to why the 'No-Go' Option is not preferred.		
The No-Go alternative is not preferred due to the following reasons:		

- The HOA will maintain invasive alien vegetation across the proposed open space areas.
- Considering that the site does contain areas where development can be considered without compromising ecological integrity, patterns or processes, optimising vacant land within the urban edge is worth considering.
- Development rights will contribute to the economic sustainability of the Municipality through rates and taxes that is much higher than the current rates for open space.
- The development footprint is not deemed unacceptable considering that the majority of the site will still remain natural with ecological functioning, whilst economic benefits will arise from the preferred alternative.
- The proposed development will allow for better preservation/maintenance of the riparian area of the Keurbooms Estuary.

1.7.	Provide and explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.
------	--

Should any reasonable and feasible alternatives be proposed as part of the stakeholder engagement process, such will be considered and responded to as part of the ongoing environmental process.

1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.
------	---

The proposed development is deemed preferable and suitable for the proposed property for the following reasons:

- Site location is suitable within the urban context in terms of proximity to town centres, amenities and public beaches.
- Accessibility is existing with well-maintained access roads (access can be gained from existing Rietvlei Road).
- Partial development of the site is aligned with the planning principles of optimising vacant land within an urban environment.
- The development of a lifestyle village in this location is deemed compatible with the surrounding land use character which consist of single residential, apartments, resorts and other holiday accommodations.
- Highly sensitive biodiversity areas/corridors will be avoided and actively maintained.
- The development footprint is small and allows for a large Open Space area.

2. “NO-GO” AREAS

Explain what “no-go” area(s) have been identified during identification of the alternatives and provide the co-ordinates of the “no-go” area(s).

The delineated estuary habitat and 33m buffer zone located in the eastern portion of the proposed development site is considered as No-Go areas and should be avoided during the pre-construction and construction phases (Figure 17).

No-Go areas for environmental sensitivity that have been identified, must be established/demarcated before commencement of construction. All personnel involved in the development must be briefed about the exact location of the “No-Go” areas. These areas must be avoided during the construction phase. For the operational phase residents will be able to access this area via existing pedestrian routes through the thicket but no further disturbance may be allowed.

The protected trees identified will be accommodated in the development layout plan and will not be removed (Figure 14). However, if any additional protected tree saplings are identified in the planning and investigation period, it will be handled accordingly by either adjusting the site layout plan or obtaining the relevant permits for replanting.

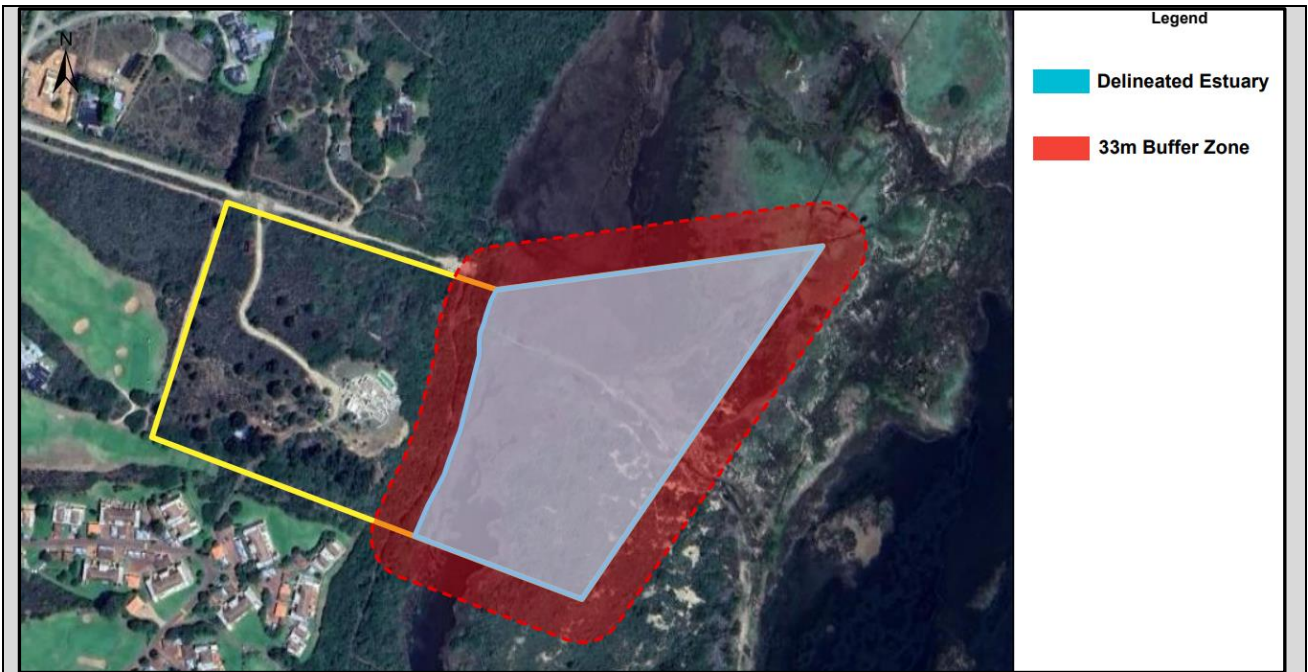


Figure 17: Delineated estuary habitat with 33m buffer zone considered as No-Go areas.

3. METHODOLOGY TO DETERMINE THE SIGNIFICANCE RATINGS OF THE POTENTIAL ENVIRONMENTAL IMPACTS AND RISKS ASSOCIATED WITH THE ALTERNATIVES.

Describe the methodology to be used in determining and ranking the nature, significance, consequences, extent, duration of the potential environmental impacts and risks associated with the proposed activity or development and alternatives, the degree to which the impact or risk can be reversed and the degree to which the impact and risk may cause irreplaceable loss of resources.

Criteria for Assessment

These criteria are drawn from the EIA Regulations, published by the Department of Environmental Affairs and Tourism (April 1998) in terms of the Environmental Conservation Act No. 73 of 1989.

These criteria include:

- **Nature of the impact**

This is the appraisal of the type of effect the construction, operation and maintenance of a development would have on the affected environment. This description should include what is to be affected and how.

- **Extent of the impact**

Describe whether the impact will be: local extending only as far as the development site area; or limited to the site and its immediate surroundings; or will have an impact on the region, or will have an impact on a national scale or across international borders.

- **Duration of the impact**

The specialist / EAP should indicate whether the lifespan of the impact would be short term (0-5 years), medium term (5-15 years), long term (16-30 years) or permanent.

- **Intensity**

The specialist / EAP should establish whether the impact is destructive or benign and should be qualified as low, medium or high. The study must attempt to quantify the magnitude of the impacts and outline the rationale used.

- **Probability of occurrence**

The specialist / EAP should describe the probability of the impact actually occurring and should be described as improbable (low likelihood), probable (distinct possibility), highly probable (most likely) or definite (impact will occur regardless of any prevention measures).

The impacts should also be assessed in terms of the following aspects:

- **Legal requirements**

The specialist / EAP should identify and list the relevant South African legislation and permit requirements pertaining to the development proposals. He / she should provide reference to the procedures required to obtain permits and describe whether the development proposals contravene the applicable legislation.

- **Status of the impact**

The specialist / EAP should determine whether the impacts are negative, positive or neutral ("cost – benefit" analysis). The impacts are to be assessed in terms of their effect on the project and the environment. For example, an impact that is positive for the proposed development may be negative for the environment. It is important that this distinction is made in the analysis.

- **Accumulative impact**

Consideration must be given to the extent of any accumulative impact that may occur due to the proposed development. Such impacts must be evaluated with an assessment of similar developments already in the environment. Such impacts will be either positive or negative, and will be graded as being of negligible, low, medium or high impact.

- **Degree of confidence in predictions**

The specialist / EAP should state what degree of confidence (low, medium or high) is there in the predictions based on the available information and level of knowledge and expertise.

Based on a synthesis of the information contained in the above-described procedure, you are required to assess the potential impacts in terms of the following significance criteria:

No significance: the impacts do not influence the proposed development and/or environment in any way.

Low significance: the impacts will have a minor influence on the proposed development and/or environment. These impacts require some attention to modification of the project design where possible, or alternative mitigation.

Moderate significance: the impacts will have a moderate influence on the proposed development and/or environment. The impact can be ameliorated by a modification in the project design or implementation of effective mitigation measures.

High significance: the impacts will have a major influence on the proposed development and/or environment and will result in the “no-go” option on the development or portions of the development regardless of any mitigation measures that could be implemented. This level of significance must be well motivated.

4. ASSESSMENT OF EACH IMPACT AND RISK IDENTIFIED FOR EACH ALTERNATIVE

Note: The following table serves as a guide for summarising each alternative. The table should be repeated for each alternative to ensure a comparative assessment. The EAP may decide to include this section as Appendix J to this BAR.

Terrestrial Biodiversity Impact Assessment		
Alternative:	No Go Option	Alternative 1 (Preferred)
Construction and Operational Phases		
Potential impact and risk:	Direct Loss of Habitat (Degradation / Loss of Natural Habitat)	
Nature of impact:	Negative - Indirect	Negative - Direct
Extent and duration of impact:	Extent Without and With Mitigation: Site (The impact will only affect the site). Duration Without and With Mitigation: Long-term (The impact and its effects will continue or last for the entire operational life of the development but will be mitigated by direct human action or by natural processes thereafter (10-50 years)).	Extent Without and With Mitigation: Site (District) (The impact will affect the site, local area or district). Duration Without and With Mitigation: Permanent (The only class of impact that will be non-transitory. Mitigation either by man or natural process will not occur in such a way or such a time span that the impact can be considered transient (Indefinite)).
Consequence of impact or risk:	Poor management of habitat may result in long-term degradation of vegetation on site.	Construction activities will result in clearing of natural habitat, to be replaced by the infrastructure. This will result in permanent local loss of vegetation.
Probability of occurrence:	Possible Without and With Mitigation (The impact may occur (between 25% to 50% chance of occurrence)).	Definite Without and With Mitigation (Impact will certainly occur (greater than a 75% chance of occurrence)).
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss of resources Without and With Mitigation.	Marginal loss of resources Without and With Mitigation.

Degree to which the impact can be reversed:	Partly reversible Without and With Mitigation (The impact is partly reversible but more intense mitigation measures are required).	Irreversible Without and With Mitigation (The impact is irreversible and no mitigation measures exists).
Indirect impacts:		
Cumulative impact prior to mitigation:	None Identified.	None Identified.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative (The anticipated impact will have negligible negative effects and will require little to no mitigation).	Site Scale: High Negative (The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact). District Scale: Medium Negative (The anticipated impact will have moderate negative effects and will require moderate mitigation measures).
Degree to which the impact can be avoided:		
Degree to which the impact can be managed:		
Degree to which the impact can be mitigated:		
Proposed mitigation:	No mitigation is envisaged therefore the post-mitigation score is identical.	<ul style="list-style-type: none"> • Compile and implement an alien management plan, which highlights control priorities and areas and provides a programme for long-term control. • Use indigenous and site-appropriate plant species in any rehabilitation and landscaping. • No additional clearing of vegetation should take place without a proper assessment of the environmental impacts, unless for maintenance purposes, in which case all reasonable steps should be taken to limit damage to natural areas.

		<ul style="list-style-type: none"> Obtain permits for any protected trees that may need to be pruned or removed.
Residual impacts:		
Cumulative impact post mitigation:		
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative (The anticipated impact will have negligible negative effects and will require little to no mitigation).	<p>Site Scale: High Negative (The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact).</p> <p>District Scale: Medium Negative (The anticipated impact will have moderate negative effects and will require moderate mitigation measures).</p>
Construction and Operational Phases		
Potential impact and risk:	Invasion by alien invasive plant species (Invasion by alien invasive plant species, leading to degradation of indigenous habitat)	
Nature of impact:	Negative - Indirect	Negative - Indirect
Extent and duration of impact:	<p>Extent Without and With Mitigation: Site (The impact will only affect the site).</p> <p>Duration Without and With Mitigation: Long-term (The impact and its effects will continue or last for the entire operational life of the development but will be mitigated by direct human action or by natural processes thereafter (10-50 years)).</p>	<p>Extent Without and With Mitigation: Site (The impact will only affect the site).</p> <p>Duration Without Mitigation: Long-term (The impact and its effects will continue or last for the entire operational life of the development but will be mitigated by direct human action or by natural processes thereafter (10-50 years)).</p> <p>Duration With Mitigation: Medium-term (The impact and its effects will continue or last for some time after the construction phase but will be mitigated by direct</p>

		human action or by natural processes thereafter (2 – 10 years)).
Consequence of impact or risk:	Disturbance and clearing of natural habitat leads to conditions that are ideal for alien invasive species to colonise. Once present, the modify the environment in ways that limit recovery of indigenous habitat.	Disturbance and clearing of natural habitat leads to conditions that are ideal for alien invasive species to colonise. Once present, the modify the environment in ways that limit recovery of indigenous habitat.
Probability of occurrence:	Probable Without and With Mitigation (The impact will likely occur (between a 50% to 75% chance of occurrence)).	Without Mitigation: Probable (The impact will likely occur (between a 50% to 75% chance of occurrence)). With Mitigation: (Possible (The impact may occur (between 25% to 50% chance of occurrence)).
Degree to which the impact may cause irreplaceable loss of resources:	Without Mitigation: Significant loss of resources With Mitigation: Marginal loss of resources.	Without Mitigation: Significant loss of resources With Mitigation: None
Degree to which the impact can be reversed:	Partly reversible Without and With Mitigation (The impact is partly reversible but more intense mitigation measures are required).	Partly reversible Without and With Mitigation (The impact is partly reversible but more intense mitigation measures are required).
Indirect impacts:		
Cumulative impact prior to mitigation:		
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative (The anticipated impact will have moderate negative effects and will require moderate mitigation measures).	Medium Negative (The anticipated impact will have moderate negative effects and will require moderate mitigation measures).
Degree to which the impact can be avoided:		
Degree to which the impact can be managed:		
Degree to which the impact can be mitigated:		

<p>Proposed mitigation:</p>	<p>Under the No-Go option, it is assumed that no alien control as mitigation could be applied.</p>	<ul style="list-style-type: none"> • Compile and implement an alien management plan, which highlights control priorities and areas and provides a programme for long-term control. • Use indigenous and site-appropriate plant species in any rehabilitation and landscaping. • Protect natural areas outside of the development footprint from disturbance.
<p>Residual impacts:</p>		
<p>Cumulative impact post mitigation:</p>		
<p>Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)</p>	<p>Low Negative (The anticipated impact will have negligible negative effects and will require little to no mitigation).</p>	<p>Low Negative (The anticipated impact will have negligible negative effects and will require little to no mitigation).</p>

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

1.	<p>Provide a summary of the findings and impact management measures identified by all Specialist and an indication of how these findings and recommendations have influenced the proposed development.</p> <p>Aquatic Biodiversity Impact Assessment (Confluent Consulting): The Aquatic Biodiversity Impact Assessment stipulated the following:</p> <ul style="list-style-type: none"> • A estuary habitat was delineated in the eastern portion of the proposed development property. <ul style="list-style-type: none"> ○ <u>Mitigation:</u> The proposed development layout was amended to avoid the entire delineated estuary habitat in the eastern portion of the property. Development infrastructure will be focussed in the higher lying western portion of the property. • A estuary buffer of 33m is recommended. <ul style="list-style-type: none"> ○ <u>Mitigation:</u> The 33m estuary buffer will be adhered to as this will protect the Keurbooms Estuary from residential development and will provide a level of connectivity between the terrestrial and wetland areas. <p>Neither construction or operational phase activities are expected to have any negative impacts on the estuarine health. The sensitivity of the proposed development site can be regarded as Low for aquatic biodiversity.</p> <p>Due to the location of the proposed development site in the FEPA, the following consideration should be taken into account to ensure that stormwater is managed according to the Sustainable Drainage System (SuDS) principles:</p> <ul style="list-style-type: none"> • Stormwater must not be discharged directly into the estuary. • Rainwater harvest tanks must be installed at the proposed residential units as well as communal buildings to reduce water entering the stormwater system. • Make use of swales and retention ponds to attenuate stormwater runoff on site. This will increase infiltration and reduce the speed and volume of stormwater runoff discharged from the proposed development site. • Make use of permeable paving to promote infiltration into the soil. • Make use of retention ponds and artificial wetlands to capture stormwater runoff. <p>The buffer zone is located on steep slopes which will be vulnerable to erosion during site clearance. The following recommendations are made as erosion control measures:</p> <ul style="list-style-type: none"> • Ensure that construction activities do not cause any preferential flow paths and concentrated surface runoff. • Demarcate the construction area. This will ensure that construction vehicles do not compact soil or disturb any vegetation within the buffer zone. • To reduce the transport of sediment, make use of silt fences and biodegradable coir logs which can be placed along contours. • Vegetation clearing should be done in parallel with the construction progress. This will minimize erosion and runoff. • Revegetate exposed areas once construction has been completed. • Stormwater runoff that is generated by hardened surfaces should be discharged in retention areas such as swales and retention ponds. This will reduce concentrated runoff and erosion.
----	--

The Keurbooms Estuary is not defined as a watercourse and therefore the proposed development will not be within the regulated area of a watercourse. Consequently, **no water use authorisation is required.**

Terrestrial Biodiversity Impact Assessment (David Hoare Consulting): The Terrestrial Biodiversity Impact Assessment stipulated the following:

- Estuarine habitats on site (eastern portion of the property) are sensitive and should be avoided.
 - The proposed development will apply avoidance mitigation to the eastern portion of the property and all infrastructure is proposed on the western portion that is already disturbed/degraded.
- Mesic Thicket habitat on the sea-facing slope is sensitive. The Mesic Thicket forms an essential buffer between estuarine and terrestrial ecosystems.
 - No development is proposed in the identified Mesic Thicket habitat.
- The fynbos that is present on site, is in poor condition. The poor condition of the fynbos could be as a result of long-term degradation or due to being secondary, however, there is no evidence of historical cultivation.
 - The preferred site alternative was identified considering the overall site sensitivity of Portion 38 of Farm Ganse Vallei 444. The preferred area on the property is already disturbed by historical grazing activities. The prolonged exclusion of burning contributed to the disappearance of Garden Route Shale Fynbos vegetation. The vegetation is no longer representative of the endangered fynbos species and rather of secondary grassy fynbos.

The habitats on Portion 38 of Farm Ganse Vallei that has the highest sensitivity and ecological value are excluded from the proposed development footprint.

Mitigation measures identified in the Terrestrial Biodiversity Impact Assessment:

- Compile and implement an alien management plan, which highlights control priorities and areas and provides a programme for long-term control.
- Use indigenous and site-appropriate plant species in any rehabilitation and landscaping.
- No additional clearing of vegetation should take place without a proper assessment of the environmental impacts, unless for maintenance purposes, in which case all reasonable steps should be taken to limit damage to natural areas.
- Protect natural areas outside of the development footprint from disturbance.
- Obtain permits for any protected trees that may need to be pruned or removed.

Botanical Compliance Statement (David Hoare Consulting): The Botanical Compliance Statement Stipulated the following:

- No plant species of concern were identified on site.
- The estuarine habitat (eastern portion of the property) is a known habitat for *Zostera capensis* (Least Concern). This species is ecologically important and listed as a sensitive species. The estuarine habitat have a Site Ecological Importance of Very High/
 - No development is proposed in the identified estuarine habitat (eastern portion of the property).
- Two protected tree species were identified on site namely *Pittosporum viridiflorum* and *Sideroxylon inerme*. The exact location of the protected trees were marked with GPS coordinates.
 - The site development plan was amended to avoid all the identified protected tree species (Figure 14).

It is noted that time lapse from when the protected tree survey is undertaken, to inform the environmental/planning applications, till implementation, could be a number of years during which

time germination of more protected tree species may occur and/or surveyed trees would have grown larger/died off. It is therefore a recommendation that the actual footprints of each unit be checked prior to final construction. The current layout will not however result in the removal of protected trees. Should trimming or relocation of younger trees be required the Applicant must apply for the necessary Forestry Permit in terms of the Act.

Faunal Compliance Statement (David Hoare Consulting): The Faunal Compliance Statement stipulated the following:

- The proposed development site is not considered to a suitable or critical habitat for any of the animal species identified in the Screening Tool Report.
- Areas outside the development footprint that have a Very High Site Ecological Importance will not be affected by the proposed development.
- The eastern portion of the proposed development site containing thicket have a moderate to high probability of the Knysna Warbler (Vulnerable) to occur, however, no development is proposed in the eastern portion of the property.
- The Crowned Eagle (Near Threatened) is unlikely to occur on the proposed development site even though the Mesic Thicket in the eastern portion of the property may constitute part of their general foraging range.
- Small antelope species could potentially find a suitable habitat in the Mesic Thicket in the eastern portion of the property. However, due to landscape connectivity issues, the small antelope species are unlikely to be present.

It is verified that the Animal Species Theme has a Medium sensitivity for the proposed development site.

2. List the impact management measures that were identified by all Specialist that will be included in the EMPr

All impact management measures that were identified by all specialists and described above (Section H, 4. And Section I, 1.) will be included in the EMPr.

3. List the specialist investigations and the impact management measures that will **not** be implemented and provide an explanation as to why these measures will not be implemented.

All impact management measures and specialist findings have been accommodated in the preferred alternative.

4. Explain how the proposed development will impact the surrounding communities.

Development of a lifestyle estate, in this particular area next to the Keurbooms Estuary is unlikely to deter from the character/value of the greater area.

The proposed development will contribute to the socio-economic value of Bitou Municipality in the following ways:

- Create temporary employment opportunities during pre-construction and construction phase.
- Create employment opportunities during operational phase.
- Create temporary employment opportunities for contractors, small businesses and suppliers during construction and operational phases.
- Increase in the attraction of Bitou Municipality.
- Improve the holistic financial sustainability of the local municipality due to additional rates and taxes being generated.

There will be mostly temporary impacts associated with the construction phase, namely noise and potentially dust pollution. The following key mitigation measures are submitted as part of the BAR (refer to the EMMPr (Appendix H) for more details):

- Construction activities must be limited to Mondays – Fridays (07:00 – 18:00) and Saturdays (08:00 – 13:00).

	<ul style="list-style-type: none"> • Work may not take place on Sunday's or public holidays. • Vegetation clearing must be done in phases to avoid large pieces of land being exposed to wind (which could result in unnecessary dust pollution). • Make use of wetting agents should dust be a problem. • Rehabilitation of work areas to take place as soon as possible to minimise dust pollution; • An ECO must be appointed to oversee construction and must keep record of any complaints regarding noise/dust pollution. • Construction material must be stored on-site, and construction vehicles must not obstruct traffic flows.
5.	<p>Explain how the risk of climate change may influence the proposed activity or development and how has the potential impacts of climate change been considered and addressed.</p> <ul style="list-style-type: none"> • Water will become a very scarce resource as periods of drought will be longer. Therefore, the use of rainwater collection tanks is important at the communal buildings as well as residential even to provide additional water supply for landscaping and irrigation. • Rainfall intervals will become less, but downpours may be more severe. Therefore, stormwater management on the site is important to prevent unnecessary erosion and/or flooding. The use of SUDS throughout the development, coupled with rainwater tanks at communal buildings, as well as road and parking design will reduce the chances of erosion caused by stormwater runoff. • Longer, drying periods will impact on plant growth and keeping landscaped areas presentable requires irrigation/watering. Planting only indigenous, endemic plants in landscaped areas will reduce the need for irrigation and also ensure that landscaped areas are more resilient during periods of drought.
6.	<p>Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.</p> <p>There are no conflicting recommendations between specialists.</p>
7.	<p>Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.</p> <p>All findings and recommendations by the specialists have been incorporated into the proposal.</p>
8.	<p>Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.</p> <ol style="list-style-type: none"> 1. Avoid Impacts: <ul style="list-style-type: none"> • Avoid protected indigenous tree species identified by specialist studies. Avoidance mitigation has been applied to the preferred alternative. • Survey the recommended 33m buffer zone from the estuary habitat prior to construction commencement to ensure that no development encroaching into this sensitive area. • Demarcate all protected trees prior to any vegetation clearing/development commencing to ensure that contractors do not cause harm/damage to such sensitive features in the landscape. 2. Minimise Impacts: <ul style="list-style-type: none"> • Clear Portion 38 of Farm Ganse Valle 444 of all NEMBA listed invasive alien vegetation species prior to any site clearing/development to ensure that indigenous vegetation can recover and rehabilitate more easily. • Limit construction activities to specified days and times. • Clear the site in a phase manner to reduce dust pollution. • Only indigenous vegetation permitted in the place of the loss of remaining on-site natural vegetation/habitat.

- Appointing an ECO to oversee construction to further minimise the potential for unnecessary direct or indirect impacts during the construction as well as the operational phase of the development.
 - Implement resource conservation measures as part of the design, construction and operational phases.
 - Implement Environmental Maintenance and Management Plan under ECO supervision.
3. **Rectify**
- None necessary.
4. **Reduce**
- Ensure that an ECO inspects the property regularly during its lifespan to monitor for (A) invasive alien vegetation and (B) encroachment into the remaining natural areas i.e. development creep.
5. **Off-Site**
- None necessary.

SECTION J: GENERAL

1. ENVIRONMENTAL IMPACT STATEMENT

1.1.	Provide a summary of the key findings of the EIA.						
	<ul style="list-style-type: none"> • From a spatial planning perspective, the development proposal is deemed to be in line with the Western Cape SDF, Bitou Municipal SDF and IDP, particularly considering development of vacant land within the urban context. • The development proposal is likely to contribute to positive socio-economic impacts through income generation as part of the residential erven sales, employment opportunities during the construction and operational phases. • The site layout design avoids all highly sensitive areas as well as protected tree species identified and assessed by specialists. • The development proposal is in character with surrounding residential developments. • Services are available through existing municipal supply. • All specialist findings and mitigation measures have been considered and incorporated into the preferred alternative. 						
1.2.	Provide a map that that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2)						
The preferred alternative is representative of an overlay of the environmentally sensitive features (only features of concern) with the development proposal avoiding it.							
1.3.	Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.						
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; text-align: center;">Positive</th> <th style="width: 50%; text-align: center;">Negative</th> </tr> </thead> <tbody> <tr> <td style="vertical-align: top;">Optimising of vacant land in an urban context.</td> <td style="vertical-align: top;">Temporary noise, dust and safety impacts associated with the movement of heavy vehicles.</td> </tr> <tr> <td style="vertical-align: top;">Temporary employment opportunities during construction (to semi-skilled and unskilled workers mostly).</td> <td style="vertical-align: top;">Loss of vegetation.</td> </tr> </tbody> </table>	Positive	Negative	Optimising of vacant land in an urban context.	Temporary noise, dust and safety impacts associated with the movement of heavy vehicles.	Temporary employment opportunities during construction (to semi-skilled and unskilled workers mostly).	Loss of vegetation.
Positive	Negative						
Optimising of vacant land in an urban context.	Temporary noise, dust and safety impacts associated with the movement of heavy vehicles.						
Temporary employment opportunities during construction (to semi-skilled and unskilled workers mostly).	Loss of vegetation.						

Employment opportunities during the operational phase (to skilled and semi-skilled workers mostly).	Temporary risk of increase crime during construction.
Support for local economic development and tourism.	Temporary increase in construction vehicular traffic.
Income generation for the Municipality from additional development through rates and taxes.	Additional pressure on non-renewable services.
Income generation for the Applicant with sale of properties.	Continued maintenance cost (alien clearing, access control, clearing of dumped materials).

2. RECOMMENDATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (“EAP”)

2.1.	Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMPr
<ul style="list-style-type: none"> • Pre-construction clearing must be done with input from the ECO to ensure that new germinated protected tree/plant species, or trees that have grown in size between the date of EA and implementation, are identified for potential Forestry Permit applications (trimming or relocation). • Ensure that the remnant thicket habitat is cleared of all invasive alien species and maintained as such. • Rezoning all of the remaining natural areas to an appropriate Zoning to prohibit unwanted development creep or encroachment into remaining natural thicket areas down to the estuary. • Demarcate the remaining thicket (inclusive of the 33m buffer zone) prior to development commencing to ensure that no development goes beyond this line. • Implement and adhere to an approved Environmental Maintenance and Management Plan. • Apply for Forestry Permits if any trimming/roots/relocation may be required during construction or operational phases and must be obtained prior to the trimming/relocation of any protected trees. • Communal facilities and houses must be fitted with rainwater tanks to be used for irrigation of landscaped areas. • All landscaping must be indigenous vegetation in replacement of the loss of secondary vegetation/fynbos. Ornamental plant that are not indigenous/endemic must be planted in plant boxes or pots only. • No invasive alien species may be used for landscaping/gardening purposes. • Restrict working times and hours to minimise noise/dust pollution. • Employ minimum 50% local labour. • Source minimum 50% construction materials locally. • Resource conservation measures must be implemented. • ECO must be appointed for the duration of the construction phase. • Access into the remaining thicket may only be through means of existing walkways. 	
2.2.	Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.
Please refer to Section J) 2.1, 2.3, 3, 4 and 5 below.	

2.3.	Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.
<p>The proposed activity can be considered for environmental authorisation for the following reasons:</p> <ul style="list-style-type: none"> • The western portion of the site is not deemed sensitive overall, therefore limiting development to the western portion is not likely to result in an unacceptable environmental loss; • The loss of approximately 3.17ha of secondary vegetation within the proposed property is deemed acceptable on condition that the prescribed pre-construction, construction and operational conditions are adhered to. <p><u>PRE-CONSTRUCTION:</u></p> <ul style="list-style-type: none"> • Development may not proceed until such time as all approvals are obtained. • An ECO must be appointed prior to construction to oversee site preparation, vegetation removal and construction. • DAFF permits must be obtained prior to relocation/trimming/cutting of any protected trees and/or on the property. • Pre-construction clearing must be done with input from the ECO to ensure that new germinated protected tree/plant species, or trees that have grown in size between the date of EA and implementation, are identified. • Remnant thicket (inclusive of the 33m buffer area along the estuary habitat) must be demarcated prior to any site clearing/development commencing to ensure that no encroachment happens into this sensitive area. • All NEMA listed invasive alien vegetation must be removed from the remnant thicket area prior to construction commencing. • ECO to demarcate all protected trees prior to any site clearing or development activities commencing. <p><u>CONSTRUCTION:</u></p> <ul style="list-style-type: none"> • ECO must be appointed for the duration of the construction phase and must inspect site activities on a regular basis to ensure compliance with the EA and EMP; • Clearing of vegetation must be planned in phases to avoid large open areas that will be vacant for periods of time and that could result in unwanted dust pollution; • The thicket area must remain demarcated for the duration of the construction phase. • EMP must be implemented and adhered to. <p><u>OPERATIONAL:</u></p> <ul style="list-style-type: none"> • Only existing walkways may be used to access the remnant thicket area; • Landscaping must be done with indigenous vegetation (preferably endemic species) and ornamental plants may only be planted in plant boxes and pots with no invasive alien vegetation permitted on the estate. • Occupation of units may only be permitted on condition that the necessary external link services and upgrades have been completed. 	
2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.
<p>The EAP assumes that the necessary approvals such as planning approvals / building plan approvals and contracts i.e., service level agreements, will be finalised within the initial five (5) year commencement period to allow the Developer to commence with the listed activities within the validity period of the EA.</p>	
2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.

Five (5) year validity period for the EA from date of authorisation to commence with construction.
Five (5) year implementation period from commencement to completion of project.

3. WATER

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.

Residential units as well as all communal buildings must be fitted with rainwater tank collection systems for the operational phase to supplement municipal potable water for landscaping and irrigation.

Potable water may not be used during the construction phase.

4. WASTE

Explain what measures have been taken to reduce, reuse or recycle waste.

The contractor must provide recycle bins on the property during construction and must ensure that staff is aware of what products can be recycled/reused.

At-source separation of waste must be implemented during the operational phase

5. ENERGY EFFICIENCY

8.1. Explain what design measures have been taken to ensure that the development proposal will be energy efficient.

Only LED lights must be used within the development.

Heat and/or solar pumps and/or gas geysers (or similar) must be used throughout the development.

SECTION K: DECLARATIONS


1. DECLARATION OF The Applicant

Note: Duplicate this section where there is more than one Applicant.

I NILS BRINK VAN ZYL on behalf of INTERGREEN (PTY) LTD, ID number 5205235096088.....in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
 - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
 - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
 - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
 - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
 - Legitimate costs in respect of specialist(s) reviews; and
 - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.

Signature of the Applicant: 

2023/10/10

Date:

Intergreen (Pty) Ltd

Name of company (if applicable):


2. DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (“EAP”)

I, **Ms Louise-Mari van Zyl**, EAPASA Registration number**2019/1444**..... as the appointed EAP hereby declare/affirm the correctness of the information provided or to be provided as part of this Pre-Application Draft Basic Assessment Report, and that:

I, **Mr Francois Byleveld**, EAPASA Registration number**2023/6770**..... as the appointed Candidate EAP hereby declare/affirm the correctness of the information provided or to be provided as part of this Pre-Application Draft Basic Assessment Report, and that:

- Information provided in this BAR and any other documents/reports submitted in support of this BAR;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;

	2024/02/23
Signature of the EAP:	Date:

	2024/02/23
Signature of the Candidate EAP:	Date:

Cape Environmental Assessment Practitioners (Cape EAPrac)
 Name of company (if applicable):

3. DECLARATION OF THE REVIEW EAP

I ~~.....~~, EAPASA Registration number ~~.....~~ as the appointed Review EAP hereby declare/affirm that:

- ~~• I have reviewed all the work produced by the EAP;~~
- ~~• I have reviewed the correctness of the information provided as part of this Report;~~
- ~~• I meet all of the general requirements of EAPs as set out in Regulation 13 of the NEMA EIA Regulations;~~
- ~~• I have disclosed to the applicant, the EAP, the specialist (if any), the review specialist (if any), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; and~~
- ~~• I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.~~

~~.....~~ ~~2022/09/06~~

 Signature of the EAP: _____ Date:

~~Cape Environmental Assessment Practitioners (Cape EAPrac)~~

 Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I **Dr J.M. Dabrowski**, as the appointed **Aquatic Specialist** hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

Signature:



Date: 19 January 2024

Confluent Environmental

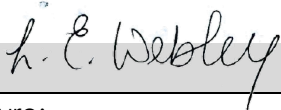
Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I **Dr Lita Webley**, as the appointed **Archaeological Specialist** hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.



Signature:

19 January 2024

Date:

N/A

Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I **Dr David Hoare**, as the appointed **Biodiversity Specialist** hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

13 February 2024

Signature:



Date:

David Hoare Consulting (Pty) Ltd

Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I **Dr David Hoare**, as the appointed **Botanical Specialist** hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

13 February 2024

Signature:



Date:

David Hoare Consulting (Pty) Ltd

Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I **Dr Wynand Vlok**, as the appointed **Faunal Specialist** hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am ~~not~~ independent, ^{on} ~~but~~ another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.



12 February 2024

Signature:

Date:

BioAssets CC.


Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I **Stefan Ethan de Kock**, as the appointed **Heritage Specialist** hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

	19 January 2024
Signature:	Date:

Perception Planning
Name of company (if applicable):