



PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT

for

HOUSE PHILIP

on

A portion of Portion 257 of Farm Melkhoute
Fontein No. 480, Still Bay, Hessequa Municipal
District, Western Cape Province

In terms of the

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

Prepared for Applicant:

Ellis Farming Enterprises CC

Date: 20 June 2025

Appointed EAP: Ms Louise-Mari van Zyl
Assisted by Candidate EAP: Ms Mariska Byleveld
Email: louise@cape-eaprac.co.za / mariska@cape-eaprac.co.za
Report Reference: HES868/05
Department Reference: 16/3/3/6/7/1/D5/18/0398/24
Case Officer: Dorien Werth

10 Feb 2025 1

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

Appointed EAP: 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.

Assisted by Candidate EAP: Ms Mariska Byleveld (MSc Geology [University of the Free State]) (Candidate EAPASA Registration Number: **2023/6593**).

PURPOSE OF THIS REPORT:

Stakeholder Review & Comment

APPLICANT:

Ellis Farming Enterprises CC

CAPE EAPRAC REFERENCE NO:

HES868/05

SUBMISSION DATE

23 June 2025

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

HOUSE PHILIP

A portion of Portion 257 of Farm Melkhoute Fontein No. 480, Still Bay, Hessequa Municipal
District, Western Cape Province

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
Web: www.cape-eaprac.co.za

PO Box 2070
17 Progress Street
George 6530

ORDER OF REPORT

Basic Assessment Report – Main 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 : Response from HWG~~

~~Appendix E2 : Copy of comment from Cape Nature~~

~~Appendix E3 : Final Comment from BOCMA~~

~~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~~

- AppendixE15 : ~~Comment from the local authority~~
- AppendixE16 : ~~Confirmation of all services (water, electricity, sewage, solid waste management)~~
- AppendixE17 : ~~Comment from the District Municipality~~
- AppendixE18 : ~~Copy of an exemption notice~~
- AppendixE19 : ~~Pre-approval for the reclamation of land~~
- AppendixE20 : ~~Proof of land use rights/zoning~~
- 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 & Technical Reports
- Appendix H : Environmental Management Programme (EMP)
- Appendix I : Screening tool report

TABLE OF CONTENTS

GENERAL PROJECT DESCRIPTION.....	10
SECTION A: ADMINISTRATIVE DETAILS.....	24
SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS.....	25
SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS.....	29
SECTION D: APPLICABLE LISTED ACTIVITIES.....	37
SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY.....	39
SECTION F: PUBLIC PARTICIPATION.....	48
SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT.....	51
SECTION H: ALTERNATIVES,.....	59
SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES.....	82
SECTION J: GENERAL.....	85
SECTION K: DECLARATIONS.....	88

LIST OF FIGURES

Figure 1: Locality Map of Portion 257 of Farm Melkhoute Fontein No. 480 in relation to Still Bay (yellow arrow).....	10
Figure 2: Existing access to Farm via a gravel road that connects directly to the R305. The yellow box within the farm property indicates the approximate locality of the photo above.11	
Figure 3: The existing gravel road continues south in the general direction of the Goukou River (yellow box) (purple arrow), where it traverses the neighbouring Portion 132/480 (light blue arrow) towards the preferred locality of the primary dwelling (blue box).	11
Figure 4: 30m Building line that needs to be relaxed.	12
Figure 5: Orientation of the properties prior to consolidation.	13
Figure 6: Goukou Estuary Flood Lines and Extreme Tidal Levels used to best inform site selection (source: WML Coast).	14
Figure 7: Site Development Plan & Cross-Sections of the proposed Primary Dwelling and associated services infrastructure. (a) The access road on 132/480 is currently in the process of being registered (orange arrow). The development footprint of the primary dwelling and associated services infrastructure amounts to approximately 13m ² (blue box) (b) The proposed primary dwelling and associated infrastructure (conservancy tank, rainwater tank & parking) is located on a lawn / grassed area that does not contain any plant or fauna SCC. Although in an Estuarine Functional Zone, the preferred locality does not impact on estuarine habitat (c) The floor level will be at 5.5m above the high-water mark as per the recommendations of WML Coast (red ovals indicate that the house will be on stilts/pillars to be raised above natural ground level).	15
Figure 8: Planned water supply.	17
Figure 9: Existing structures / infrastructure on 257/480 Melkhoute Fontein.	25
Figure 10: Preferred Site Development Plan.	26
Figure 11: South-section of the proposed dwelling designed to be completely elevated from natural ground level to ensure that the structure is above the 1:100 year flood line.	27
Figure 12: Planned water supply.	28

Figure 13: Coastal Management Map with SDP overlay (CML = PINK line; CPZ = ORANGE line). 29

Figure 14: A milkwood clump/tree located directly behind and in close proximity to the proposed dwelling (footprint pegs visible in the image to ensure avoidance). 30

Figure 15: Stilbaai MPA and recreational zones in Goukou Estuary. 33

Figure 16: Preferred Site Development Plan. 39

Figure 17: South-section of the proposed dwelling. 40

Figure 18: Photos illustrating the position of the proposed dwelling (yellow circles: surveyed pegs). As seen above, the proposed dwelling will be located on a grassed area outside Terrestrial CBA and Albany Thicket (CR) to the North and East. 42

Figure 19: Coastal Management Map with SDP overlay. 43

Figure 20: Existing Eskom connection available on site (yellow circle). Blue circle: approximate locality of the primary dwelling. 44

Figure 21: Mapped estuarine and wetland habitats (Confluent Environmental, 2025). 51

Figure 22: Coastal Management Map with SDP overlay. 53

Figure 24: Goukou Estuary Flood Lines and Extreme Tidal Levels (WML Coast). 53

Figure 24: Map indicating aquatic buffer area (construction phase). 55

Figure 25: Coastal Management Map with SDP overlay. 55

Figure 26: Photos illustrating the position of the proposed dwelling (yellow circles: surveyed pegs). As seen above, the proposed dwelling will be located on a grassed area outside Terrestrial CBA and Albany Thicket (CR) to the North and East. 57

Figure 27: Preferred Site Alternative of the New Primary Dwelling on 257/480 Melkhoute Fontein that is situated in close proximity to their extended family house on the neighbouring property from where existing services and access to the river are already in existence. 59

Figure 28: Preferred Site Alternative next to the Goukou River and adjoining their extended family residence on the neighbouring cadastral unit. 60

Figure 29: Locality Alternatives considered on 257/480 Melkhoute Fontein. 60

Figure 30: Existing family owned dwelling on 132/480 with existing access and services infrastructure (source: NuPlan Africa, 2025). 63

Figure 31: Eskom connection available on site (yellow circle). Blue circle: approximate locality of the primary dwelling. 63

Figure 32: Existing surface-laid water pipeline at the neighbouring farm property (132/480) which receives water from an existing borehole on 257/480. 64

Figure 33: Blue Oval: Right of Access Servitude across 132/480 (family owned property). 64

Figure 34: Optimal view & easy access to the Goukou River. No environmental sensitivities within the development footprint. 65

Figure 35: Locality Alternative B (least preferred). Yellow circle: locality of existing primary dwelling with existing services infrastructure (electrical & water) on 132/480. 66

Figure 36: Higher riverbank reeds. 66

Figure 37: Left: water surface level for the Present 1 in 100 year flood line (WML Coast) at both localities. Right: Coastal Management Lines (red: Coastal Protection Zone; pink: Coastal Management Line). 66

Figure 38: Locality Alternative C - Agricultural grazing fields used for grazing in close proximity to existing buildings (labourer's cottage & storage building for the storage of farming equipment). 67

Figure 39: Site Alternative D. 68

Figure 40: Steep gravel road down to the Goukou River (yellow circle). 69

Figure 41: Fynbos Species at Site Alternative D. 70

Figure 42: Additional Plant Species found in proximity to Site Alternative D. 70

Figure 43: No-Go area delineated by the Aquatic Specialist for the construction phase. 83



Western Cape
Government

Department of Environmental Affairs and
Development Planning

BASIC ASSESSMENT REPORT

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

APRIL 2024



Western Cape
Government

BASIC ASSESSMENT REPORT

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

APRIL 2024

(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

(This must Include an overview of the project including the Farm name/Portion/Erf number)

Ellis Farming Enterprises CC, hereafter referred to as the Applicant, proposes to develop the **primary dwelling** and associated **household service infrastructure**, including a grassed parking area for vehicles, surface laid water pipelines to feed their one (1) rainwater harvesting tank and one (1) conservancy tank, on a portion of Portion 257 of Farm Melkhoute Fontein No. 480 near Still Bay in the Hessequa Municipal District (Western Cape Province) (Figure 1).

The farm property is located North-West (inland) of Still Bay, approximately 8km from the “Riethuiskraal” turn-off via the R305 (Figure 1). Access to the farm property is via an unnamed gravel road that connects directly to the R305 (Figure 2). This gravel road continues south in the general direction of the Goukou River, where it traverses the neighbouring Portion 132/480 (Figure 3) to provide access to the preferred site location for the dwelling. The existing access (across 132/480) has been registered as a formal servitude access with consent from the property owner of Prt 132/480 (Figure 3 – light blue arrow).



Figure 1: Locality Map of Portion 257 of Farm Melkhoute Fontein No. 480 in relation to Still Bay (yellow arrow).



Figure 2: Existing access to Farm via a gravel road that connects directly to the R305. The yellow box within the farm property indicates the approximate locality of the photo above.



Figure 3: The existing gravel road continues south in the general direction of the Goukou River (yellow box) (purple arrow), where it traverses the neighbouring Portion 132/480 (light blue arrow) towards the preferred locality of the primary dwelling (blue box).

Environmental & Planning Processes

This pre-application Basic Assessment Report (BAR) is circulated for stakeholder comment alongside the planning application for deviation/relaxation of the 30m building line. The competent authority for the environmental application will not be able to make a final decision on the environmental application, most notably to the preferred site location, until such time as there is clarity on whether or not the 30m building line will be relaxed or not, hence a joint stakeholder engagement process.

This pre-application 30-day commenting period will be followed by a further 30-day commenting period on the updated Draft BAR document. All registered stakeholders that comment and participate during the pre-application phase will automatically be notified when the draft BAR is circulated once more for comment.

Despite the neighbouring Portion 132/480 being a family related property with family residence, the cadastral property separating the preferred location and the existing house, still maintains a 30m building line as is the norm for agricultural properties.

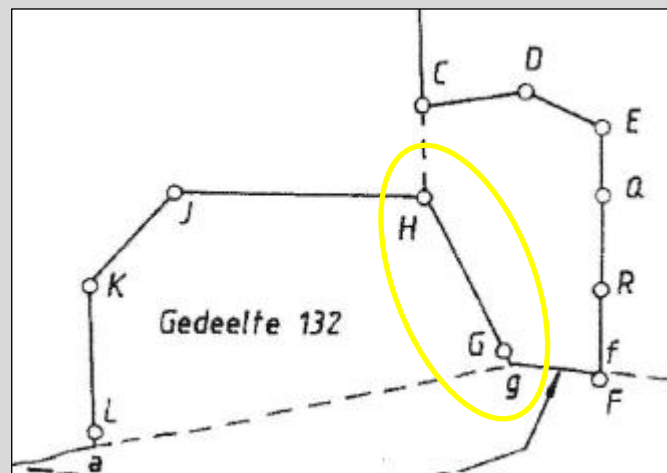


Figure 4: 30m Building line that needs to be relaxed.

An Application for the **Permanent Departure** [in terms of section 15(2)(b) of the Hessequa Municipality: By-law on Municipal Land Use Planning, 2015, (P.N. 287 of 2015)] of the western boundary line from 30m to 1m, to allow for the construction of the new primary dwelling, has been submitted to the Hessequa Municipality for consideration. The purpose of the application is to obtain the required land use rights to construct a main dwelling on the subject property that is situated close to the property boundary. A planning motivation report is attached as Appendix G6 of the Pre-App DBAR and it is noted that the relaxation is done with the full consent from the owner of the adjoining Portion 132/480.

The planning motivation report is being circulated with this Pre-App Draft BAR for a 30-day review & commenting period to align the processes and ensure an integrated and transparent stakeholder engagement process.

Specific written comments on the **planning motivation report** must be submitted to the Planner (danette@nuplanafrika.co.za) and Hessequa Planning Department (landuse@hessequa.gov.za) on or before 23 July 2025.

Preferred Site Development Plan & Services

The Applicant initially owned only the main farm (referred to as 'Area A' for the purposes of orientation) and subsequently purchased and consolidated another property in August 2021 (referred to as 'Area B' for the purposes of orientation). Prior to the purchase and consolidation, 'Area A' was previously Remainder Portion 25 Farm Melkhoute Fontein 480 (46.29ha) and Area B was previously Portion 256 (a portion of Portion 24) Farm Melkhoute Fontein 480 (2.02ha). Consolidated it is referenced as Portion 257 Farm Melkhoute Fontein 480 (50.15ha in extent).

- Importantly 'Area B' (previously Portion 564 a portion of Portion 24/480) had a primary right for a single residence prior to the consolidation;
 - Noting therefore that had the property not been consolidated, the most logical and probably feasible location for the primary residence would be within the already transformed lawn where the Applicant proposes to develop this residence because the remainder of the property consist of intact thicket and/or steep slopes.
- The Applicant purchased 'Area B' for with this primary right in mind since its location along the river is also directly adjacent to their family home on Portion 132/480 where the family vacations.
- The Applicant and their family has been utilising this area to camp (temporary accommodation) over holidays ever since. The intention of the Applicant is to formalise the accommodation in the form of the residence.

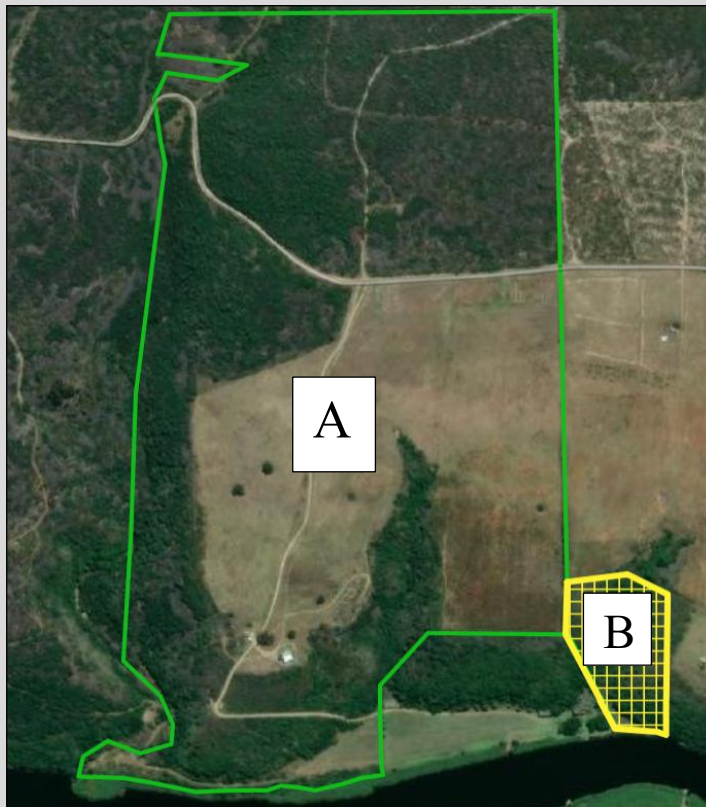


Figure 5: Orientation of the properties prior to consolidation.

The Applicant appointed WML Coastal Engineers to conduct a **flood level study** of the Goukou River to best inform the placement of the primary dwelling at the preferred locality (Figure 6 – yellow circle).

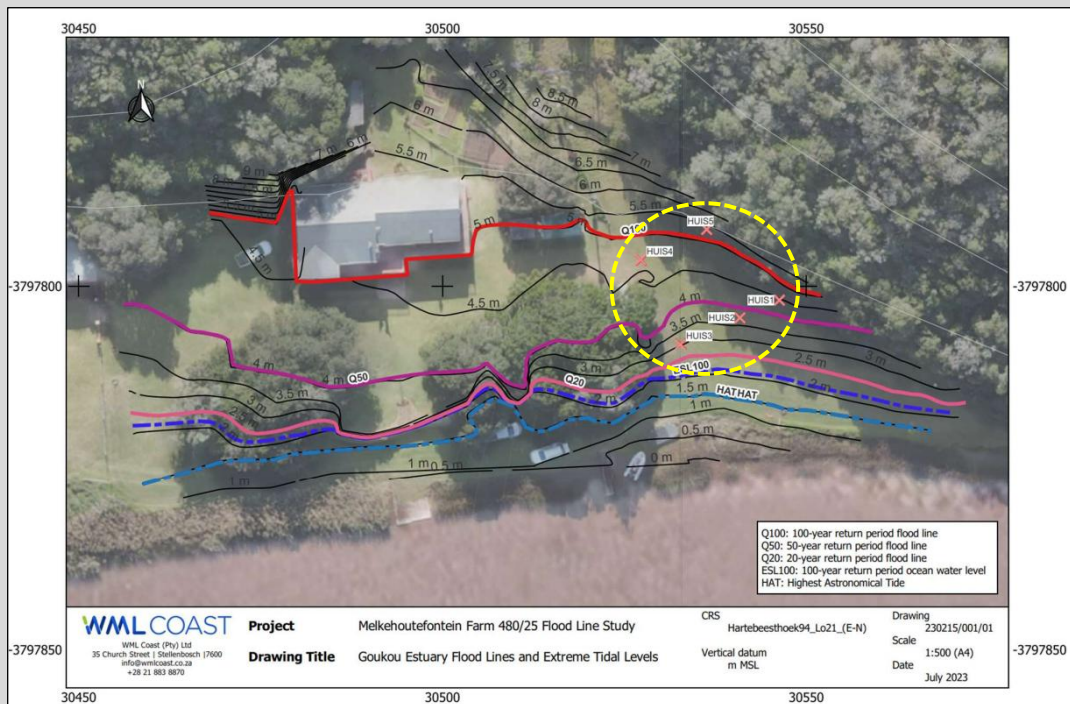


Figure 6: Goukou Estuary Flood Lines and Extreme Tidal Levels used to best inform site selection (source: WML Coast).

WML Coast confirmed that the proposed dwelling will be within 32m from the edge/bank of the river and within 100m of the high-water mark of the Goukou Estuary, which is a tidal system. After a detailed investigation of the Goukou Estuary flood lines, as well as tidal levels, WML Coast provided the following recommendations:

- The dwelling **must be built on piled supports (pillars)** to raise the structure **above** the stipulated flood lines to be a sustainable location that is **not at risk of flooding**.
- The **floor level** of the dwelling must be **elevated** above the **1 in 100-year flood level** to address potential flood risk.
- The design of the **house must be setback** to account for potential (future) scour of the riverbank due to potential future flood events / tidal sea level rise to **ensure sufficient buffering**.

The **Site Development Plan (SDP)** takes into account the above recommendations made by the specialist coastal engineers (Figure 7).

Considering that this dwelling will not be constructed at ground level (rather it will be elevated and on pillars), the structure will only have a **shadow footprint** of $\pm 158\text{m}^2$ although the **physical** footprint accounts for the supporting pillars/stilts only (± 30 pillars, $\pm 0.07\text{m}^2$ each, totalling to $\pm 3\text{m}^2$ with additional for the conservancy tank and rain water tank platform).

Apart from the support pillars ($\pm 3\text{m}^2$), the only other excavations will be for the $\pm 6\text{m}^2$ conservancy tank and a $\pm 4\text{m}^2$ concrete slab to create a level area for the rainwater tank. The $\pm 36\text{m}^2$ parking area remains undisturbed (vehicles will park on the already grassed area behind the house).

The total *physical* development footprint amounts to **$\pm 13\text{m}^2$** ($\pm 3\text{m}^2$ stilts / pillars, $\pm 6\text{m}^2$ conservancy tank & $\pm 4\text{m}^2$ concrete slab).

The 'shadow footprint' amounts to **$\pm 204\text{m}^2$** all inclusive (primary dwelling, conservancy tank, rainwater tank & grassed parking).

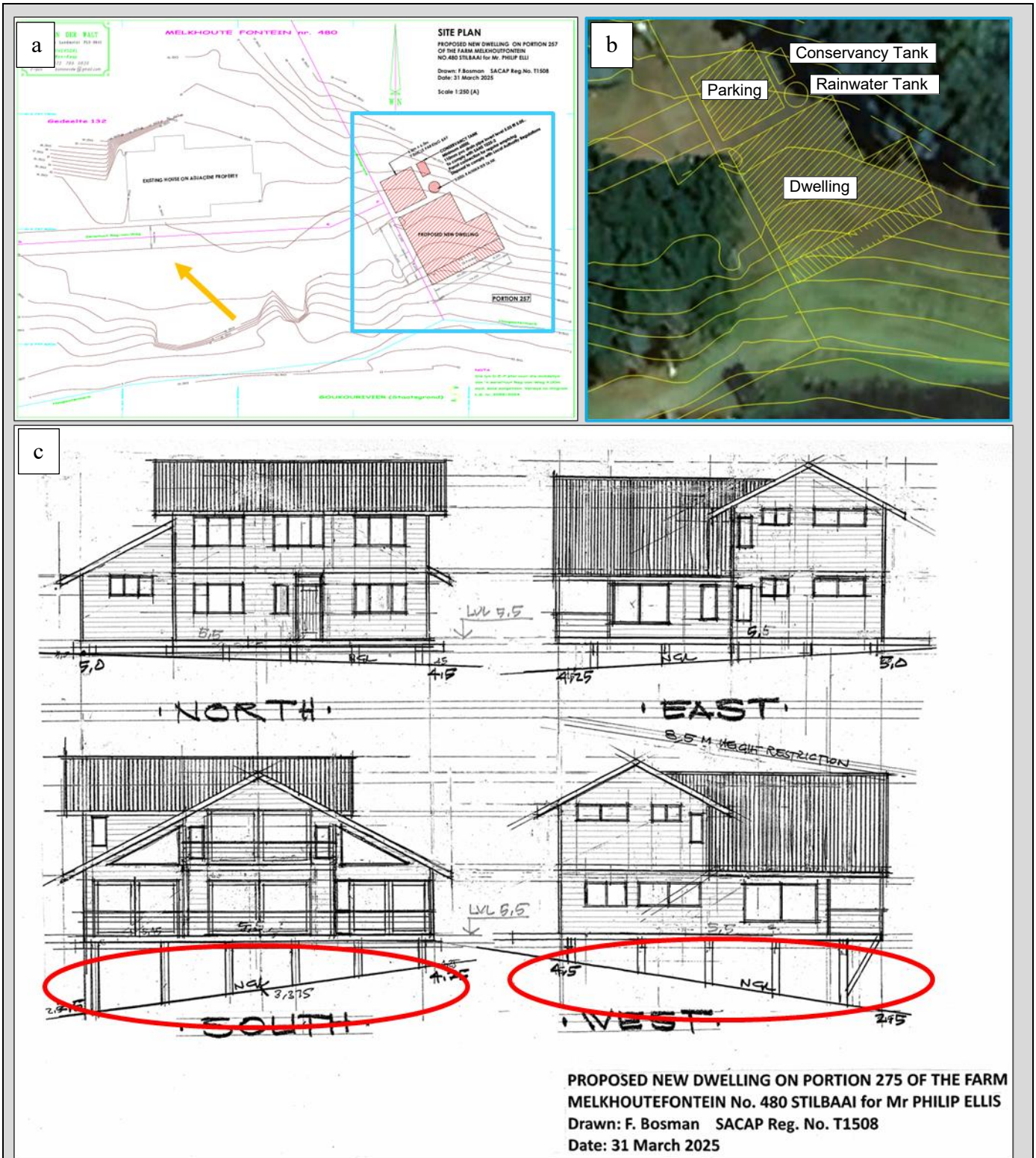


Figure 7: Site Development Plan & Cross-Sections of the proposed Primary Dwelling and associated services infrastructure. (a) The access road on 132/480 is currently in the process of being registered (orange arrow). The development footprint of the primary dwelling and associated services infrastructure amounts to approximately 13m² (blue box) (b) The proposed primary dwelling and associated infrastructure (conservancy tank, rainwater tank & parking) is located on a lawn / grassed area that does not contain any plant or fauna SCC. Although in an Estuarine Functional Zone, the preferred locality does not impact on estuarine habitat (c) The floor level will be at 5.5m above the high-water mark as per the recommendations of WML Coast (red ovals indicate that the house will be on stilts/pillars to be raised above natural ground level).

Services

Water

The expected water usage for this residence will be between 800 – 1 000 litres/day and water will be sourced from the **existing borehole on the Farm with two (2) x 5000 litre water storage tanks right next to the borehole** (Figure 6). This borehole has a capacity of 8000 litres/day. The **two (2) existing water storage tanks** gravity feed via an **existing Ø20mm water pipeline** to another **two (2) existing water storage tanks** on top of the hill above the proposed dwelling (Figure 8). The **existing Ø32mm above ground water pipeline** runs from the two (2) storage tanks on the hill, to the existing neighbouring family home on 132/480.

It is proposed to install **two (2) additional water storage tanks** (5000l each) on the hill to provide additional storage for the proposed primary residence. From there a **new Ø40mm** above ground pipeline will be laid on the surface, from these storage tanks to the proposed new dwelling for general household usage i.e. kitchen, washing, toilets, baths, showers (Figure 8).

- **Potable drinking water** will be supplemented via 10 litre water bottles on a **countertop water dispenser** in the kitchen (purified water not from the borehole).
- In addition, a further 5 000 litre **rainwater tank** will be installed behind to the house and will be connected to augment house drinking water (**potable**) with a booster pump with filter system.
- The residential unit will be equipped with **water saving technology** (low flow shower heads, low flow faucets, dual flush toilets alongside energy efficient systems such as insulation for the geyser and pipe insulation).

Sewage

There is no municipal sewer system available to connect to. The calculated sewage and grey water generation from the new dwelling has been calculated as 500 - 750 litre/day which is normally for a primary dwelling of this size.

It is proposed to construct a **6000l conservancy tank** which will be emptied by the Hessequa Municipality or a private service provider, on request (confirmation from the Municipality will be included in the FBAR).

Due to its location in proximity to the river, the design of the conservancy tank is specific so that the air vent outlet of the conservancy tank, which will be situated behind the house, will be above the 1:100 year flood line to avoid 'popping' in the event of severe flooding and/or prevent spills in the event of severe flooding.

Electricity

A three phase Eskom connection is available on-site and will be readily connected to.

Solid Waste

Normal household waste (recyclable and non-recyclable) will be delivered at the main farm gate where it will be collected by the Municipality per their collection schedule of the rural areas in proximity to Still Bay (existing Municipal service).

Garden refuse is limited mostly to grass clippings of the existing lawn and will be managed on-site in such a way that it does not pose a fire hazard.



Figure 8: Planned water supply.

Summary of Environmental Sensitivities

- The **agricultural specialist disputes** the **high** agricultural sensitivity theme and **confirms** that the entire development footprint has a **LOW** agricultural sensitivity due to its assessed lack of cropping potential and it being such a small, fragmented portion of the farming unit.
- The **aquatic specialist confirms** the very **HIGH** aquatic biodiversity sensitivity due to proximity to the Goukou river. According to the aquatic specialist, while the proposed development does occur within the Estuarine Functional Zone (EFZ) of the Goukou Estuary, the development footprint is historically transformed and, through implementation of the recommended mitigation measures provided by the coastal engineers its location and design, its construction will not result in any further notable modification to functional estuarine habitat/zone. The proposed SDP is therefore considered acceptable from an aquatic biodiversity perspective.
- The **biodiversity specialist disputes** the **medium** sensitivity assigned by the DFFE Screening Tool and **confirms** that it is **LOW** since no plant SCC were found on-site and having a low probability of occurring due to the highly modified and transformed nature of the area.
- The **fauna specialist disputes** the **medium** sensitivity assigned by the DFFE Screening Tool and **confirms** that it is **LOW**. No fauna SCC was found on-site and have a low probability of occurring considering the highly modified and transformed nature of the study site.

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. *Submission of documentation, reports and other correspondence:*

The Department has adopted a digital format for corresponding with proponents/applicants or the general public. If there is a conflict between this approach and any provision in the legislation, then the provisions in the legislation prevail. If there is any uncertainty about the requirements or arrangements, the relevant Competent Authority must be consulted.

The Directorate: Development Management has created generic e-mail addresses for the respective Regions, to centralise their administration. Please make use of the relevant general administration e-mail address below when submitting documents:

DEADPEIAAdmin@westerncape.gov.za

Directorate: Development Management (Region 1):
City of Cape Town; West Coast District Municipal area;
Cape Winelands District Municipal area and Overberg District Municipal area.

DEADPEIAAdmin.George@westerncape.gov.za

Directorate: Development Management (Region 3):
Garden Route District Municipal area and Central Karoo District Municipal area

General queries must be submitted via the general administration e-mail for EIA related queries. Where a case-officer of DEA&DP has been assigned, correspondence may be directed to such official and copied to the relevant general administration e-mail for record purposes.

All correspondence, comments, requests and decisions in terms of applications, will be issued to either the applicant/requester in a digital format via email, with digital signatures, and copied to the Environmental Assessment Practitioner ("EAP") (where applicable).

4. 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.
5. All applicable sections of this BAR must be completed.
6. 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.
7. This BAR is current as of **April 2024**. 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> to check for the latest version of this BAR.
8. 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.

9. 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.
10. 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.
11. 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.
12. 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.
13. 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.
14. 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.
15. 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:	GEORGE REGIONAL OFFICE:
DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1) (City of Cape Town, West Coast District, Cape Winelands District & Overberg District)	DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 3) (Central Karoo District & Garden Route District)
The completed Form must be sent via electronic mail to: DEADPEIAAdmin@westerncape.gov.za	The completed Form must be sent via electronic mail to: DEADPEIAAdmin.George@westerncape.gov.za
Queries should be directed to the Directorate: Development Management (Region 1) at: E-mail: DEADPEIAAdmin@westerncape.gov.za Tel: (021) 483-5829	Queries should be directed to the Directorate: Development Management (Region 3) at: E-mail: DEADPEIAAdmin.George@westerncape.gov.za Tel: (044) 814-2006
Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1) Private Bag X 9086 Cape Town, 8000	Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530

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.	
Locality Map:	<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. 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.	
Site Plan:	<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 roads that will form part of the proposed development must be clearly indicated on the site plan. • 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	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. 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. 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 .
--	--

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;	✓
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	x

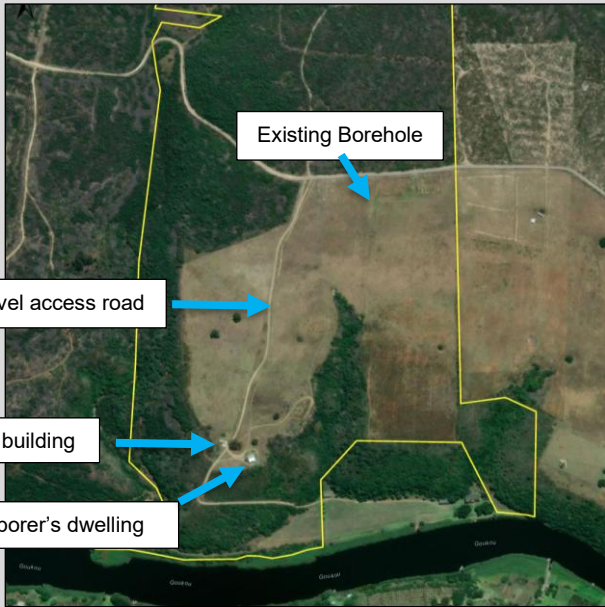
	Appendix E2:	Copy of comment from Cape Nature	X
	Appendix E3:	Final Comment from the DWS	X
	Appendix E4:	Comment from the DEA: Oceans and Coast	X
	Appendix E5:	Comment from the DAFF	X
	Appendix E6:	Comment from WCG: Transport and Public Works	X
	Appendix E7:	Comment from WCG: DoA	X
	Appendix E8:	Comment 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:	EMPr		✓
Appendix I:	Screening tool report		✓
Appendix J:	The impact and risk assessment for each alternative		BAR
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		BAR
Appendix L:	IQ Clarification on Physical Footprint		✓
Appendix M:	Right-of-Way Servitude Registration		✓

SECTION A: ADMINISTRATIVE DETAILS

	CAPE TOWN OFFICE: REGION 1	GEORGE OFFICE: REGION 3
Highlight the Departmental Region in which the intended application will fall	(City of Cape Town, West Coast District)	(Cape Winelands District & Overberg District)
Duplicate this section where there is more than one Proponent	(Central Karoo District & Garden Route District)	
Name of Applicant/Proponent:	Ellis Farming Enterprises CC	
Name of contact person for Applicant/Proponent (if other):	Philippus Viljoen Ellis	
Company/ Trading name/State Department/Organ of State:	Ellis Farming Enterprises	
Company Registration Number:	CK 1998/033137/23	
Postal address:	PO BOX 91000	
	Windhoek	Postal code: 10005
Telephone:	+264 (61) 309 111	Cell: +264 811 241819
E-mail:	www.ellisandpartners.com	Fax:
Company of EAP:	Cape Environmental Assessment Practitioners (Cape EAPrac)	
EAP name:	Louise-Mari van Zyl (Appointed EAP) / Mariska Byleveld (Candidate EAP)	
Postal address:	PO Box 2070	
	George	Postal code: 6530
Telephone:	044 874 0365	Cell: 071 603 4132 / 084 5036 587
E-mail:	louise@cape-eaprac.co.za mariska@cape-eaprac.co.za	Fax:
Qualifications:	Louise-Mari van Zyl: MA Geography [US] Mariska Byleveld: MSc Geology [UFS]	
EAP registration no:	Louise-Mari van Zyl: 2019/1444 Mariska Byleveld: 2023/6593	
Duplicate this section where there is more than one landowner	Ellis Farming Enterprises CC	
Name of landowner:	Philippus Viljoen Ellis	
Name of contact person for landowner (if other):	Philippus Viljoen Ellis	
Postal address:	PO BOX 91000	
	Windhoek	Postal code: 10005
Telephone:	+264 (61) 309 111	Cell: +264 811 241819
E-mail:	www.ellisandpartners.com	Fax:
Name of Person in control of the land:	Ellis Farming Enterprises CC	
Name of contact person for person in control of the land:	Philippus Viljoen Ellis	
Postal address:	PO BOX 91000	
	Windhoek	Postal code: 10005
Telephone:	+264 (61) 309 111	Cell: +264 811 241819
E-mail:	www.ellisandpartners.com	Fax:
Duplicate this section where there is more than one Municipal Jurisdiction	Hessequa Municipality	
Municipality in whose area of jurisdiction the proposed activity will fall:	Hessequa Municipality	
Contact person:	Hendrik Visser	
Postal address:	PO Box 29	
	Riversdale	Postal code: 6670
Telephone:	021 713 8000	Cell:
E-mail:	hendrik@hessequa.gov.za	Fax: ()

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

1.	Is the proposed development (please tick):	New	<input checked="" type="checkbox"/>	Expansion	
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				
<p>Brownfield.</p> <p>The consolidated farm property is used mostly as pasture (sheep grazing). The areas not utilised for grazing contain indigenous vegetation most notably along the Western property boundary, the Northern portions and Southern steep slopes. The lower lying level portions of the property closest to the Goukou River is also transformed pastures. Existing infrastructure/structures on the property include a labourer's dwelling which was approved in 2012, and opposite the labourer's dwelling an old storage building (storage for farming equipment). The property also has existing services (borehole & water pipelines) and an internal gravel access road (Figure 9). There is not a primary dwelling on the consolidated property.</p> <div style="text-align: center;">  </div> <p style="text-align: center;">Figure 9: Existing structures / infrastructure on 257/480 Melkhout Fontein.</p>					
3.	For Linear activities or developments				
3.1.	Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:				
3.2.	Development footprint of the proposed development for all alternatives.				
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.				
3.4.	Indicate how access to the proposed routes will be obtained for all alternatives.				
3.5.	SG-Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives				
3.6.	Starting point co-ordinates for water supply line from the borehole to the proposed reservoir				
	Latitude (S)				
	Longitude (E)				

Middle-point co-ordinates for all alternatives			
Latitude (S)			
Longitude (E)			
End-point co-ordinates for all alternatives			
Latitude (S)			
Longitude (E)			

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):	± 50.15ha
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:	± 0.0013ha (±13m ²) physical footprint ±204m ² all-inclusive shadow footprint
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).	

The Applicant proposes the following (Figure 10):

- One (1) x Primary Dwelling (shadow footprint: ±158m²; development footprint: ±3m²)
- One (1) x Conservancy Tank (±6m²)
- One (1) x Rainwater Tank (±4m²)
- One (1) x Grassed Parking Area (±36m²)

The total physical development footprint amounts to **±13m²**. The 'shadow footprint' amounts to **±204m²** all inclusive.

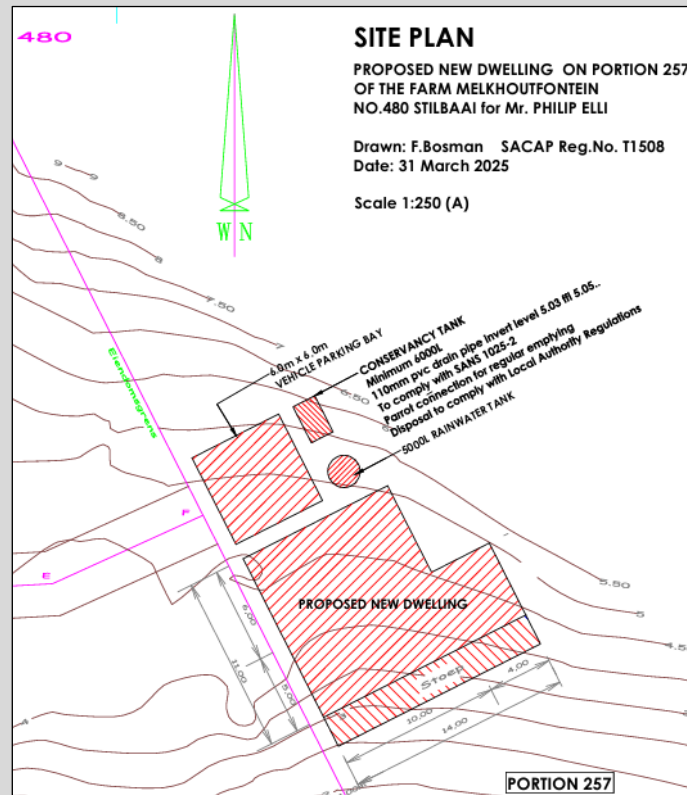


Figure 10: Preferred Site Development Plan.

As per WML Coastal Engineer's recommendations, the total dwelling structure will be elevated above the 1 in 100 year flood line with only support poles physically installed into the soil below the house (5.5m above NGL) (Figure 11). Excavations will be focused behind the dwelling for the conservancy tank and platform for the rainwater tanks only.

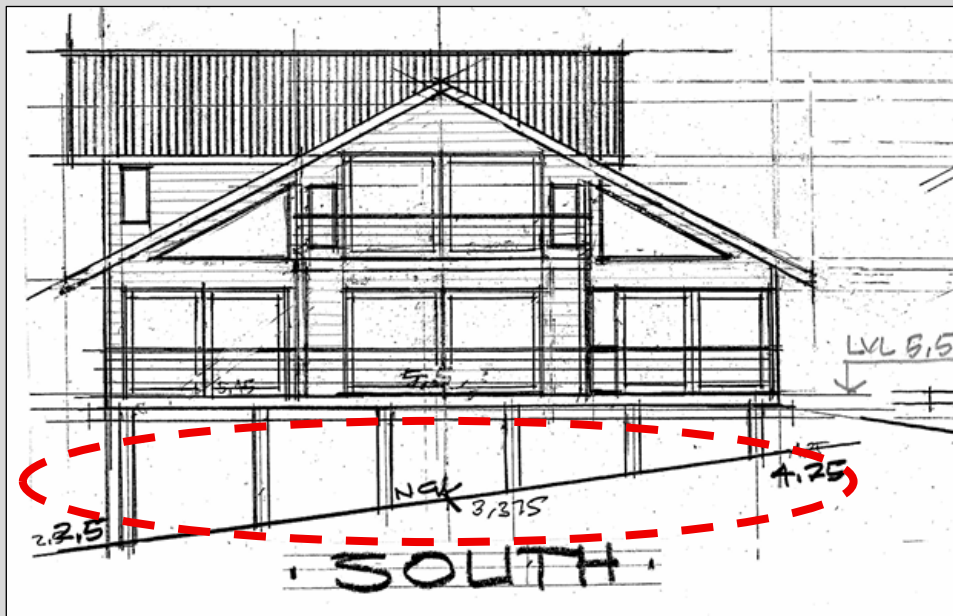


Figure 11: South-section of the proposed dwelling designed to be completely elevated from natural ground level to ensure that the structure is above the 1:100 year flood line.

Water

The expected water usage will be between 800 – 1 000 litres/day.

The following is proposed:

- The farm property has an **existing borehole with two (2) x 5000l water storage tanks** (Figure 10). The borehole has a capacity of 8000 litres/day. The two (2) existing water storage tanks gravity feed (20m head) via an existing Ø20mm water pipeline to other two (2) existing 5000 litre water storage tanks on top of the hill above the proposed dwelling (Figure 10). An existing Ø32mm above ground pipeline runs from the two storage tanks on the hill to the existing neighbouring dwelling on 132/480. It is proposed to install **two (2) additional water storage tanks** on the hill to provide storage for the proposed dwelling. From there a **new Ø40mm** above ground pipeline will be laid on the surface, from these storage tanks to the proposed new dwelling (Figure 12). This water supply will be used for residential usage.
- Drinking water will be supplemented via 10 litre water bottles on a countertop water dispenser in the kitchen (purified water).
- A further 5 000 litre rainwater tank will be installed behind to the house and will be connected to the house supply water with a booster pump with filter system.
- The residential unit will be equipped with water saving technology (low flow shower heads, low flow faucets, dual flush toilets alongside energy efficient systems such as insulation for the geyser and pipe insulation).

Sewage

There is no municipal sewer system available to connect to. The calculated sewage and grey water generation from the new dwelling has been calculated as 500 - 750 litre/day which is normally for a primary dwelling of this size.

It is proposed to construct a **6000l conservancy tank** which will be emptied by the Hessequa Municipality or a private service provider, on request (confirmation from the Municipality will be included in the FBAR).

The air vent outlet of the conservancy tank, which will be situated behind the house, will be above the 1:100 year flood line.

Electricity

A three phase Eskom connection is available on-site and will be connected to.

Solid Waste

Normal household waste (recyclable and non-recyclable) will be delivered at the main farm gate where it will be collected by the Municipality per their collection schedule of the rural areas in proximity to Still Bay.

Garden refuse is limited mostly to grass clippings of the existing lawn and will be managed on-site in such a way that it does not pose a fire hazard.



Figure 12: Planned water supply.

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

Access off the main tar road to Stilbaai, to the property, is via an unnamed gravel road that connects directly to the R305.

The gravel road continues south towards the Goukou River, where it traverses the neighbouring Portion 132/480 (servitude has been registered) to provide access to the preferred location for the dwelling.

A new road need **not** be constructed.

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	6	4	0	0	0	0	0	0	0	0	0	0	4	8	0	0	0	2	5	7
4.7.	Coordinates of the proposed site(s) for all alternatives:																						
	Latitude (S)											34°			18'			22.49"					
	Longitude (E)											21°			19'			51.90"					

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:AGA"). 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

The preferred site takes into consideration the Coastal Management Line (CML) and Coastal Protection Zone (CPZ). All services infrastructure (conservancy tank, rainwater tank & parking located *behind* the proposed dwelling) is just outside the Coastal Management Line (CML) but still within the Coastal Protection Zone (CPZ) (Figure 13).

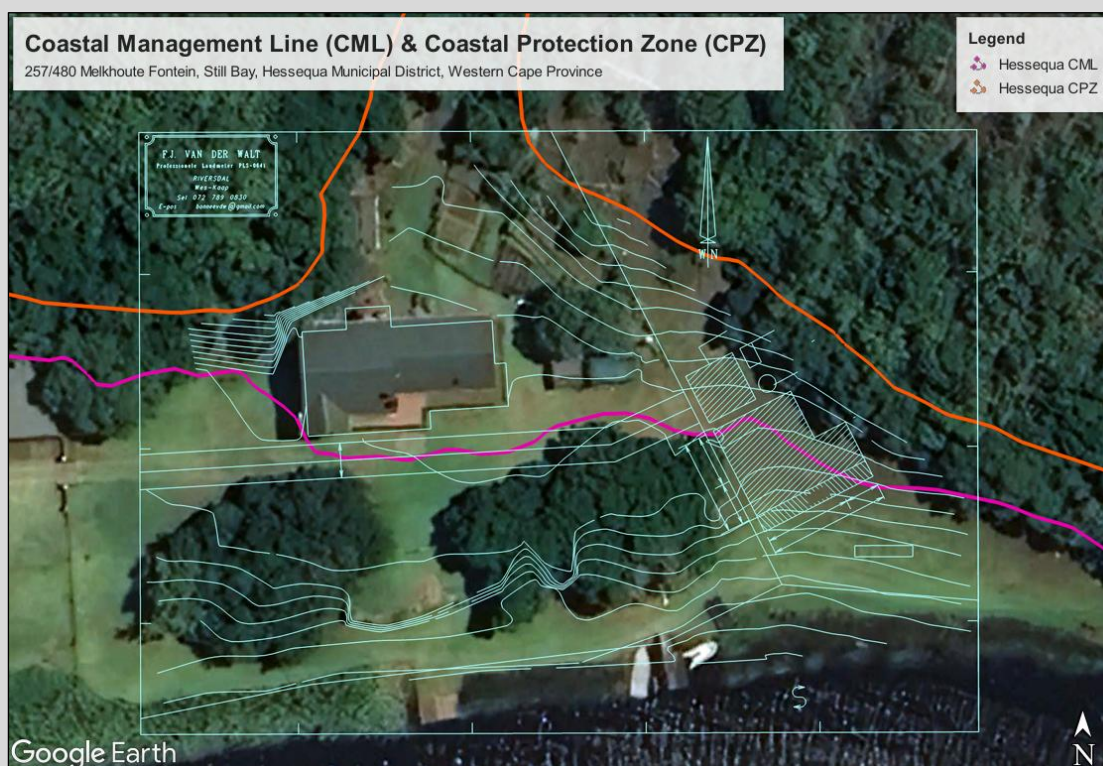


Figure 13: Coastal Management Map with SDP overlay (CML = PINK line; CPZ = ORANGE line).

With due consideration of potential flooding and long-term coastal processes that will impact on estuarine environments, the Applicant appointed WML Coastal Engineers to conduct a comprehensive Flood Line/Coastal Erosion Study to best inform the preferred site location, layout and design for the dwelling. The SDP for the preferred location is designed in accordance with the recommendations of the coastal engineers.

In addition to the above, an aquatic specialist was appointed to conduct an Aquatic Impact Assessment to assess potential negative impacts that may be associated with the Estuarine Functional Zone (EFZ) of the Goukou Estuary.

The specialist confirmed that the preferred development footprint of the proposed dwelling & associated services infrastructure, will not result in any modification to the functional estuarine habitat considering its already transformed state, as well as the elevated design that will result in limited physical disturbances.

The preferred location and design SDP is considered acceptable from an aquatic biodiversity perspective, as well as a flooding/coastal erosion perspective as verified by the independent specialists.

3. Other legislation

List any other legislation that is applicable to the proposed activity or development.

National Forestry Act (Act 84 of 1998)

Milkwood trees occur in the thicket vegetation along the steep slopes of the property directly north and east of the preferred location for the proposed dwelling (Figure 14).



Figure 14: A milkwood clump/tree located directly behind and in close proximity to the proposed dwelling (footprint pegs visible in the image to ensure avoidance).

Although the SDP has been mitigated to avoid the protected tree species, a Forestry Permit must still be obtained should these trees need to be trimmed or removed in future.

A Forestry Permit can take 4 – 5 months to obtain once building plans are approved. Applications must therefore be submitted well in advance of when a tree must be trimmed/removed and must be submitted with approved building plans as supporting documentation if applicable.

4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.

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 PSDF puts in place a coherent framework for the province’s urban and rural areas that:

- Gives spatial expression to national and provincial development agendas.
- Serves as basis for coordinated and integrated planning alignment on National and Provincial Department Programmes.
- Support municipalities to fulfil their mandates in line with national and provincial agendas.
- Communicates government's spatial development agenda.

The proposed activity complies with:

Policy R1 (Protect Biodiversity and Ecosystem Services).

The **Site Development Plan** was informed by:

- WML Coast (to avoid any potential flood risk),
- The botanical/biodiversity specialist (to avoid the highly sensitive thicket & milkwood trees),
- The aquatic specialist (to avoid estuarine habitat), and
- The fauna specialist (to avoid highly sensitive thicket habitat that has the potential to support fauna SCC).

The overarching goals of the Provincial SDF is to advise on which **type of development** should be allowed, **where** it should **take place**, and **how** such development **should be undertaken** to ensure the best possible outcomes for its people and the environment.

Considering these goals, it is submitted that a primary residence on farm is not contrary to the **type of land use/development**. In following the impact hierarchy, the **preferred location** for the dwelling does not avoid the area that is **flood prone and/or exposed to long-term estuarine processes**, however the specific **design** requirements for **elevation and structural support** reflect consideration to **minimisation** (of potential risks) and **mitigation** (of potential impacts). **No off-set is required** for the activity as proposed. Therefore the activity is also informed by the goal of ‘how’ the development should be undertaken.

Western Cape Biodiversity Spatial Plan (2017)

The WCBSP should be used as the official reference for biodiversity priority areas to be taken into account in land use planning and decision-making in the province. The WCBSP highlights ‘coastal development’ as a potential threat to biodiversity by putting pressure on vulnerable coastal/estuarine habitat. The BSP map is the product of a systematic biodiversity plan that maps CBAs and ESAs, which require safeguarding to ensure the continued existence and functioning of species and ecosystems, including the **delivery of ecosystem services** (including flood prevention / habitat support / coastal resource protection).

The Stilbaai Marine Protected Area (MPA) is situated along the coastline to the South, with the aim of protecting the Goukou Estuary and its role as a fish nursery, to preserve historical marine artefacts and cultural assets on the beach/coast and allow for the recovery of overexploited fish species (nursery for fish species). The development of a single primary dwelling along the Goukou Estuary will not impact negatively on the outcomes of the MPA.

In the case of the preferred site location, the aquatic/biodiversity specialists have **confirmed** that the proposed activity will **not impact on CBA1 or ESA2** by design and because the status quo of the preferred site is already totally transformed. Whether or not a dwelling is developed in the preferred site location,

the status quo (environmental) conditions of the site will not change, especially since the area is already utilised by the Applicant repeatedly for own temporary accommodation, parking and recreational purposes during seasonal holidays.

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.

1. Guideline on Need and Desirability, DEA (2017)
Refer to section E(12) for a detailed Need & Desirability project description.
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.
3. Guideline for Environmental Management Plans (June 2005)
The EMPr has been included with this Pre-App 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.
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. 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.
6. Goukou Estuarine Management Plan (2011)
Key issues identified as having the potential to impact negatively on the Goukou Estuary include, **floods** (as a result of removal of natural riparian vegetation that help protect against floods), **droughts** (increased upstream abstraction), **climate change** (flow changes, sea level rise that pose a long-term threat to livelihoods in the area), **road infrastructure** (encroachment/blocking of estuary and flood plain), **riparian infrastructure** (impact associated with removal of natural vegetation when development encroaching degrading natural buffers), **instream infrastructure** (jetties / slipways / artificial bank stabilization affecting the natural hydrodynamics of the system) **water abstraction** (direct, groundwater or fountains), **wastewater** (pollutants from households of waste water treatment works), **agricultural waste water** (fertilizers and agrichemicals), **alien vegetation** (replaces indigenous habitat), **clearing of riparian vegetation** (to gain access to the river making the banks vulnerable to erosion), **illegal bait collection** (threat to non-target species), **recreational fishing** (overfishing), **alien fish species** (threat to endemic species), **livestock grazing** (low lying marshes/natural wetlands utilised for grazing/manure entering estuarine area), **power boating and water skiing** (exceeding boating capacity resulting in bank erosion).
Based on these goals, it is submitted that the proposed development of a primary dwelling is not conflicting with the Goukou Estuarine Management Plan for the following reasons:
 - The preferred site for the primary dwelling will not result in the removal of riparian or wetland vegetation since the site is completely transformed and void of natural vegetation and has been

as such for decades already – thereby the development per se will not contribute to, or worsen the loss of estuarine habitat, or increase the risk of downstream flooding or loss of aquatic habitat. The Applicant has taken measures through informed design, to manage the risk of damage to the structure itself/livelihoods by raising the structure above the 1:100 year flood line and 5.5m above the Mean-Sea-Level (MSL) which accounts for measures dealing with long-term climate change impacts that may result in higher sea-levels/estuarine levels combined with increased flooding.

- The development of the primary dwelling in the preferred location does not result in the development of structures or infrastructure within the Goukou Estuary albeit within the EFZ. The design measures of raising the entire structure by having it on pillars, limits the physical footprint and effectively minimises the potential impact on the estuarine environment/processes.
- Of the listed risks identified contributing risk factor associated with this activity is that of effluent and the risk of pollution of the estuarine environment as a result of household effluent. To address this the conservancy tank is positioned behind the house and its 'air vent' will be designed to be above the 6m MSL to avoid 'popping' or potential spills during flood events.
- It is noted that the preferred site is situated approximately 12km upstream from the river mouth (refer to Figure 15 below) which is at the upstream end of the EFZ which is much less prone to tidal influence / risk of coastal erosion/flooding.
- The activity will not result in the abstraction of water from the river, nor will it contribute (compared to the status quo) to additional ecosystem related impacts on fishing / use of motorised boats on the river etc since these activities are already regulated and managed into the Management Plan / Licensed and the Applicant will not construct new slipways/jetties (utilising existing historic access to the river). Noted that the preferred site clearly falls within a so-called 'ski-zone' within the river system for which permits will be required for boat activity/use.

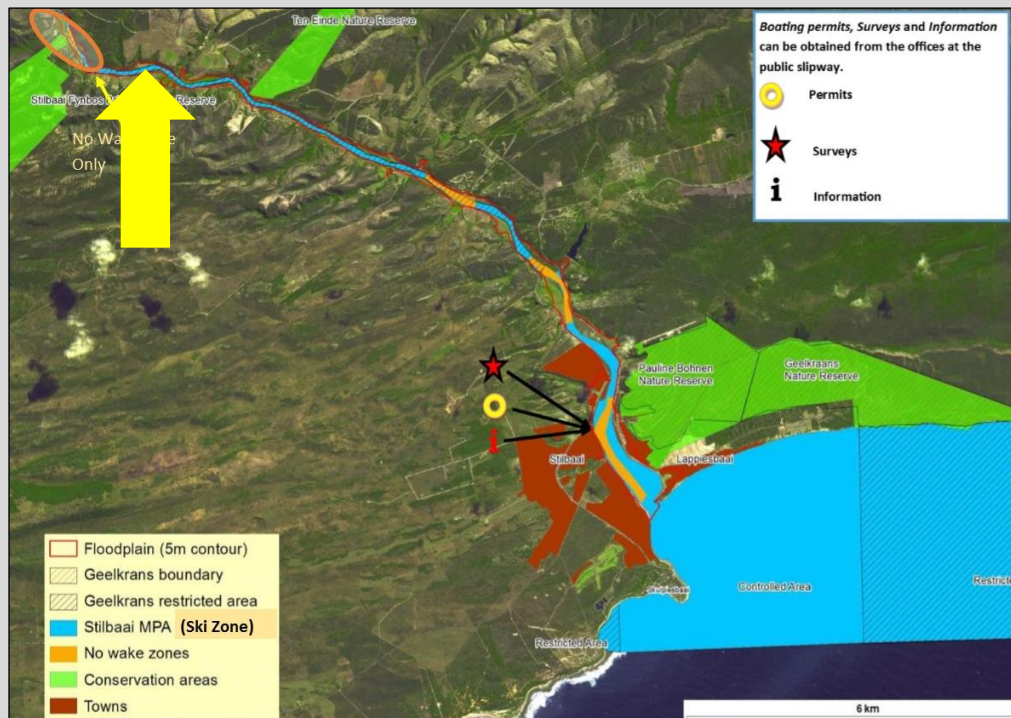


Figure 15: Stilbaai MPA and recreational zones in Goukou Estuary.

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 DE&ADP 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.

The Screening Tool identified the following studies as potentially being applicable to the proposed development:

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 Theme

The screening tool identifies the agricultural sensitivity for the entire property as “high”.

The agricultural specialist **disputes** the high sensitivity and confirms that it is LOW. The proposed dwelling will lead to a negligible loss of future agricultural production. The development site also has a lack of cropping potential and falls within an area with a low land capability evaluation (ranging between 1 – 5).

Land capability value	Agricultural sensitivity	Rain-fed cropping suitability	
		Summer rainfall areas	Winter rainfall areas
1 - 5	Low	Unsuitable	Unsuitable
6	Medium		Suitable
7			
8 - 10	High	Suitable	Suitable
11 - 15	Very High		

SoilZa compiled an **Agricultural Compliance Statement** for inclusion in the BAR (Appendix G1).

The **Western Cape Department of Agriculture** (WC-DoA) has been approached for comment.

Animal Species Theme

According to the screening tool, the proposed site has a high animal sensitivity for the following species:

Sensitivity	Feature(s)
High	Aves-Bradypterus sylvaticus
High	Aves-Circus ranivorus
Medium	Aves-Podica senegalensis
Medium	Aves-Circus maurus
Medium	Aves-Stephanoaetus coronatus
Medium	Aves-Hydroprogne caspia
Medium	Aves-Neotis denhami
Medium	Aves-Afrotis afra
Medium	Insecta-Chrysoritis brooksi tearei
Medium	Invertebrate-Aneuryphymus montanus

A SACNASP registered fauna specialist conducted a Site Sensitivity Verification of the proposed development site and confirmed the following:

- The entire development **footprint is fully transformed** with very little to no natural habitat left.
- **No fauna SCC** were found within the disturbance footprint and their presence is confirmed to be unlikely.
- The proposed activity is not expected to have an impact on species of conservation concern (SCC) beyond the boundary of the preferred site.

Confluent Environmental compiled a **Fauna Compliance Statement** for inclusion in the BAR (Appendix G2).

CapeNature has been approached for comment.

Aquatic Biodiversity Theme

The screening tool identifies the aquatic biodiversity theme as “very high”. This identification is to be expected as the Goukou River is located adjacent to the proposed development which is located within an Estuarine Functional Zone.



The aquatic specialist conducted an **Aquatic Impact Assessment** confirming that the construction will not result in any modification to the estuarine habitat (Appendix G3).

BOCMA has been approached for comment.

Archaeological and Cultural Heritage Theme & Palaeontology Theme

Heritage/Archaeology/Palaeontology (not triggering Section 38 of the NHRA) – although Palaeontology theme is listed as very high it is clear from site conditions that the footprint area falls within a transformed area where natural vegetation/environment has been disturbed and transformed consisting of lawn. Very limited excavation is required for development of the house/access track. The dwelling will be **built on piled supports** (pillars) to **raise the structure** above the stipulated flood line and 5.5m above the MSL, to minimise and reduce the risk of flooding.

Heritage Western Cape has been approached for comment on the Pre-App DBAR to indicate whether any studies are applicable.

Civil Aviation

The proposed dwelling 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 dwelling does not pose a threat to air traffic, there are no reasonable grounds to conduct any specialist studies to confirm this and **no need** for consultation with SACAA.

No formal approval is required from SACAA.

Defence

The development will pose no threat to military or defence forces of South Africa. The site is not situated near any military facilities and the Screening Tool has indicated that the sensitivity is low. There are no reasonable grounds to conduct any specialists' studies to affirm this and further consultation with the Department of Defence is **not** necessary.

Plant Species Theme & Terrestrial Biodiversity Theme

The screening tool identified the Plant Species theme as "medium" and the Terrestrial Biodiversity theme as "very high".

A SACNASP registered botanical/biodiversity specialist compiled a Site Sensitivity Verification and confirmed the following:

- **No plant SCC** were found on site and their presence are **confirmed to be unlikely**.
- The proposed development site is **not representative of Gouritz Valley Thicket**.
- The proposed activity will **not impact on CBA1 or ESA2**.
- The proposed development footprint **avoids the thicket area** containing milkwood trees.

Confluent Environmental compiled a **Botanical/Biodiversity Compliance Statement** to inform the Basic Assessment Report (Appendix G4).

CapeNature has been approached for comment on the Pre-App DBAR.

Other technical studies

- WML Coast Flood Line Study (2023) (Appendix G5)
- Planning Statement & Application (2025) (Appendix G6)
- Engineering Services Report (2025) (Appendix G7)

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>(i) dams or weir, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or</p> <p>(ii) infrastructure or structures with a physical footprint of 100 square meters or more,</p> <p>where such development occurs-</p> <p>(a) within a watercourse;</p> <p>(b) in front of a development setback; or</p> <p>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse –</p>	<p>The proposed development will have a physical footprint of less than 100 square meters, estimated at ±13m², due to the house being elevated from the natural ground level via stilts/pillars, however consider that the 'shadow footprint' is estimated at 204m² all inclusive, and the development falls within 32 metres of a watercourse measured from the edge of the Goukou River, this activity is included for consideration.¹</p>
17	<p>Development-</p> <p>(i) in the sea</p> <p>(ii) in an estuary</p> <p>(iii) within the littoral active zone</p> <p>(iv) in front of a development setback; or</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>(a) fixed or floating jetties and slipways;</p> <p>(b) tidal pools;</p> <p>(c) embankments</p> <p>(d) rock revetments or stabilising structures including stabilising walls; or</p> <p>(e) infrastructure or structures with a development footprint of 50 square metres or more.</p>	<p>The development footprint of the infrastructure is not 50 square metres or more being only ±13m². However, the 'shadow footprint' is estimated at +/- 204m² all inclusive, and is proposed within 100m inland of the high-water mark of the Goukou Estuary hence this activity is submitted for consideration.</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, pebbles or rock of more than 5 cubic metres from-</p> <p>(i) the seashore;</p>	<p>According to CapeFarmMapper the development activities fall within an Albany Thicket Valley Estuary zone and will also entail the excavation or moving of soil of more than 5 cubic metres for development purposes within 100m from the river. Excavated soil will be for the</p>

¹ IQ obtained from National DFFE dated 30/09/2024 confirming the 'physical' footprint and not the 'shadow footprint' applies in terms of the correct interpretation of this listed activity.

	<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 distance is greater; or</p> <p>(iii) the sea;</p>	<p>piled support required to carry the structure (max 30 cubic metres for each of the pillars), and elevate it above the flood line, and for the conservancy tank & water tank platform will add a further 20 cubic metres).</p>
Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 3	Describe the portion of the proposed development to which the applicable listed activity relates.
12	<p>The clearance of an area of 300m² or 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) within any critically endangered ecosystem listed in terms of section 52 of the NEMA:BA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004.</p> <p>(ii) within critical biodiversity areas identified in bioregional plans;</p> <p>(iii) Within the littoral active zone or 100m inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; or</p> <p>(iv) On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or</p> <p>(v) On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister</p>	<p>According to Cape Farm Mapper the Proposed development site falls under Gouritz Valley Thicket Ecosystem which is listed as critically endangered however none of this vegetation will be removed as a result of the development of the house. The botanist confirmed that the footprint location is wholly transformed and void of remnant Thicket (consisting of lawn).</p> <p>The preferred site alternative will not result in the clearance of 300m² or more of indigenous vegetation. However, other site alternatives (discussed under Section H) might considering additional services infrastructure and / or access roads to be installed / constructed.</p> <p>It is estimated that the preferred alternative will result to the clearance of ±40m² of vegetation, mostly grassed lawn, inclusive of</p> <ul style="list-style-type: none"> • Excavation of 30 x silts / pillars (1m x 1m): 30m² • Conservancy Tank: 6m² • Rainwater Tank: 4m² <p>The proposed development area falls under CBA Terrestrial and CBA Aquatic areas. The development also falls within 100m inland from a high-water mark of an estuarine functional zone.</p>
14	<p>The development of-</p> <p>(i) dams or weirs, where the dam or weir, including infrastructure and water surface area exceeds 10m²; or</p> <p>(ii) infrastructure or structures with a physical footprint of 10m² or more; Where such development occurs-</p> <p>(a) within a watercourse;</p> <p>(b) in front of a development setback; or</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>The proposed development will entail a physical footprint greater than 10m² (+/- 13m²) within 32 metres of a watercourse measured from the edge of a water course inclusive of the primary dwelling and associated infrastructure/structures.</p>

	Excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour.	
<p>Note:</p> <ul style="list-style-type: none"> 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. 		

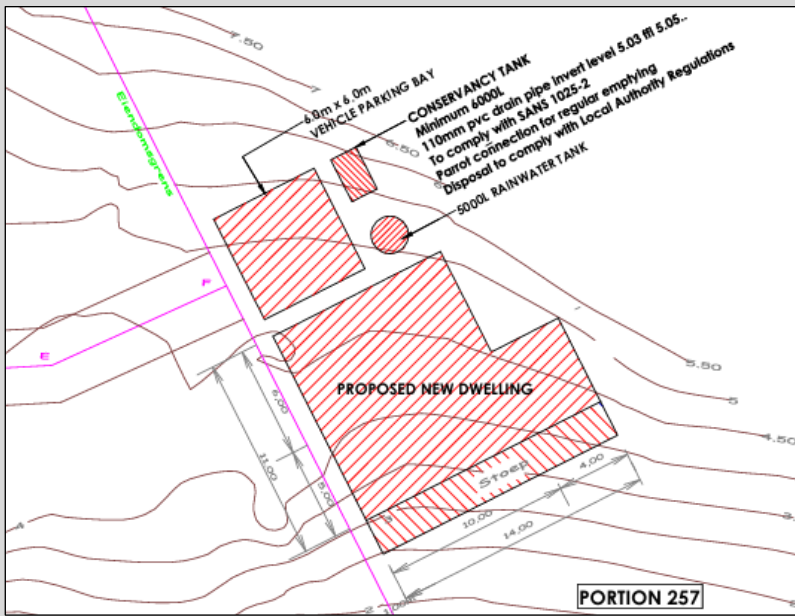
List the applicable waste management listed activities in terms of the NEM:WA

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.	<p>Provide a description of the preferred alternative.</p> <p>The preferred alternative entails the development of (Figure 16):</p> <ul style="list-style-type: none"> One (1) x Primary Dwelling (shadow footprint: ±158m²; physical development footprint: ±13m²) One (1) x Conservancy Tank (±6m²) One (1) x Rainwater Tank (±4m²) One (1) x Grassed Parking Area (±36m²) <p>The physical development footprint amounts to ±13m². The 'shadow footprint' amounts to ±204m² all inclusive (primary dwelling, conservancy tank, rainwater tank & grassed parking). Although a servitude is registered to allow access, the existing track will be utilised and no further formalising of the access is anticipated.</p> <div style="text-align: center;">  </div> <p style="text-align: center;">Figure 16: Preferred Site Development Plan.</p>
----	---

The dwelling will be elevated above the 1 in 100 year flood line (and 5.5m above MSL) (Figure 17).

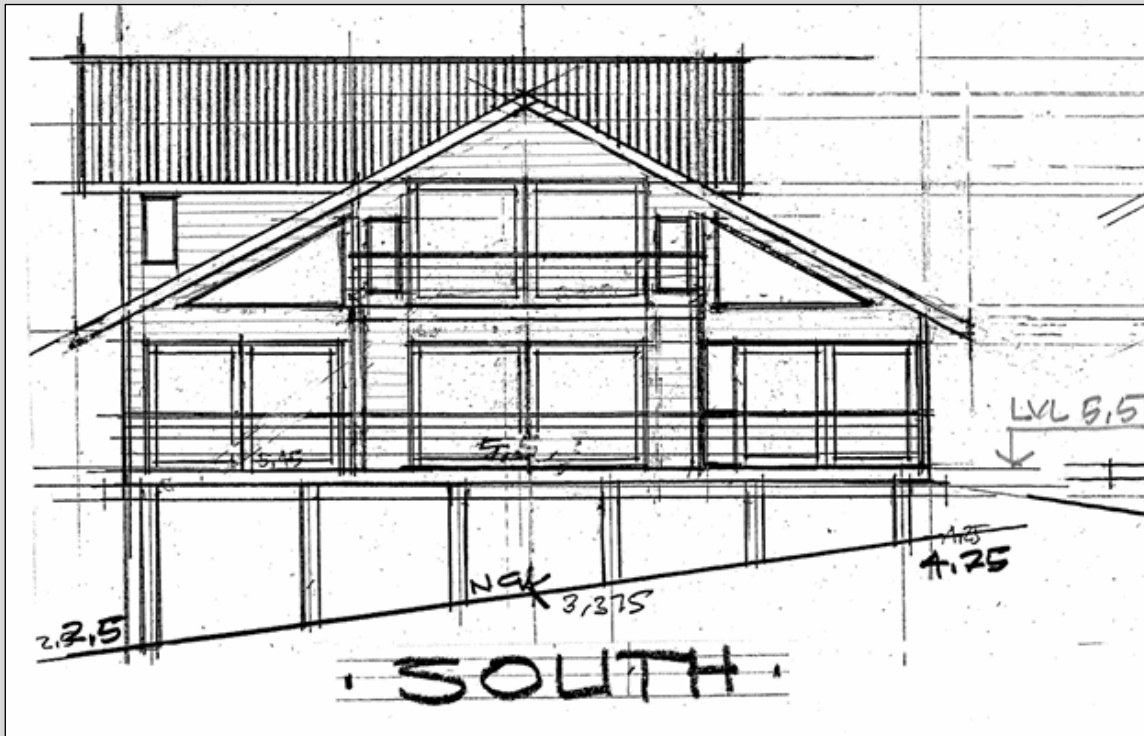


Figure 17: South-section of the proposed dwelling.

Services

Water: Borehole supply (residential use) & purified bottled water (drinking water).

Sewage: Conservancy Tank to be emptied by either the municipality or private service provider.

Electricity: A three phase Eskom connection is available on-site and will be connected to.

Solid Waste: Normal household waste (recyclable and non-recyclable) will be delivered at the main farm gate where it will be collected by the Municipality per their collection schedule of the rural areas in proximity to Still Bay. Garden refuse is limited mostly to grass clippings of the existing lawn and will be managed on-site in such a way that it does not pose a fire hazard.

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 preferred location for the dwelling is situated on what used to be a separate cadastral unit with rights for a primary dwelling. This much smaller cadastral unit was purchased by the Applicant and consolidated (2021) with the neighbouring farm to create a single large cadastral unit. Prior to the consolidation, the larger farming unit also had a primary right for a main dwelling. As a result of the consolidation of the two (2) cadastral units, the Applicant effectively 'sacrificed' the primary right for a main dwelling on the larger farming unit in favour of the primary right of the smaller cadastral unit which better serves the Applicant's site selection criteria for his primary dwelling, which include:

- Close proximity to the neighbouring primary dwelling which is situated on family property where the extended family always gathers over the holidays;
- Authorised servitude right of way registered in favour of the Applicant to serve as access to the preferred site for the primary dwelling;
- Close proximity to the Goukou River and the historic position from where the extended family launches their boats for recreational purposes (located on the neighbouring cadastral unit);

- Existing services readily available without the need to install new infrastructure to an alternative location;
- Transformed area that is historically/currently utilised by the Applicant and extended family for temporary accommodation/parking/recreational areas over the holiday periods.

Apart from the remaining thicket on the property, the majority of the farm property is utilised for farming; the old agricultural fields are mostly used for the grazing of sheep. There are currently two (2) existing structures on the property and includes:

1. A labourer's dwelling with a total floor area of 101,97m² which was approved in 2012.
2. A storage building which is used for storage of farm equipment.

An **application** has been submitted for the **permanent departure** of the western boundary building line from 30m to 1m, to allow for the construction of a new main dwelling, in terms of Section 15(2)(b) of the Hessequa Planning By-Law 2015.

Final approvals will be included in the Final Basic Assessment Report.

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.

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

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

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 PSDF puts in place a coherent framework for the province's urban and rural areas that:

- Gives spatial expression to national and provincial development agendas.
- Serves as basis for coordinated and integrated planning alignment on National and Provincial Department Programmes.
- Support municipalities to fulfil their mandates in line with national and provincial agendas.
- Communicates government's spatial development agenda.

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

- (i) Greater productivity, competitiveness and opportunities within the spatial economy,
- (ii) More inclusive development and strengthening the economy in rural areas;
- (iii) Strengthening resilience and sustainable development.

The proposed activity complies with:

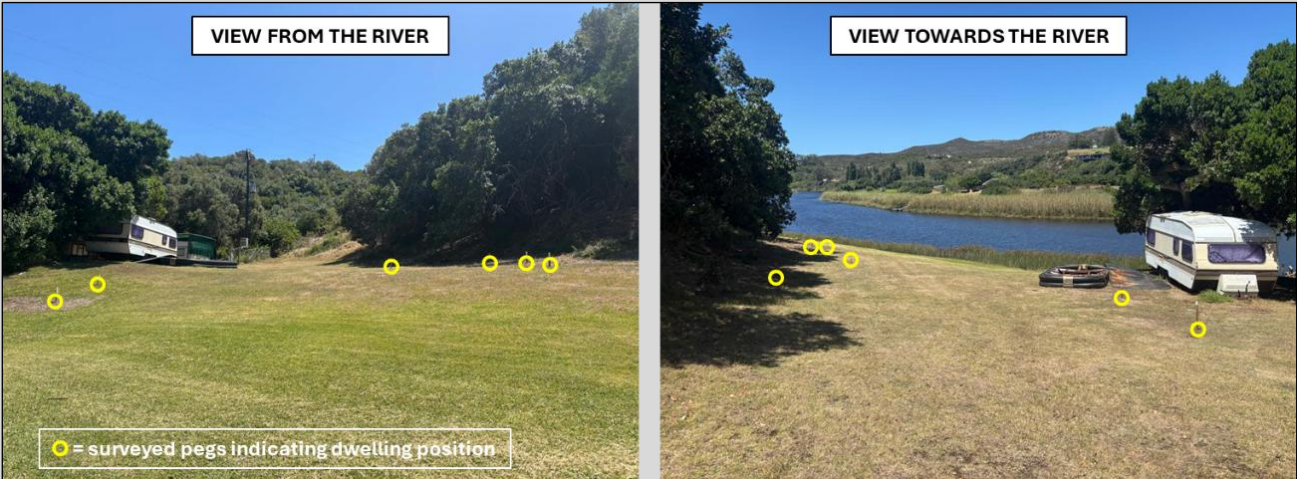
Policy R1 (Protect Biodiversity and Ecosystem Services).

The **Site Development Plan** was informed by:

- WML Coast (to avoid any potential flood risk),
- The botanical/biodiversity specialist (to avoid the highly sensitive thicket & milkwood trees),
- The aquatic specialist (to avoid estuarine habitat), and
- The fauna specialist (to avoid highly sensitive thicket habitat that has the potential to support fauna SCC).

4.2	The Integrated Development Plan of the local municipality.
-----	--

The construction of the single residential dwelling on the property does not conflict with the 2022 – 2027 IDP of the municipality.

4.3.	<p>The Spatial Development Framework of the local municipality.</p> <p>The property is zoned Agriculture I and the Applicant is proposing the implementation of this zoning by constructing a single residential dwelling on the property which is consistent with the 2024/2025 SDP considering development within a transformed area that has been assessed in terms of the Environmental Regulations to avoid/minimise/reduce/mitigate impacts.</p>
4.4.	<p>The Environmental Management Framework applicable to the area.</p>
<p>Not applicable.</p>	
5.	<p>Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.</p>
<p>Comments from relevant authorities and specialists with respect to biodiversity in response to the Pre-App Draft BAR will be included in the Draft BAR and Final BAR.</p>	
6.	<p>Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development.</p>
<p>The preferred locality of the dwelling & associated infrastructure will not have direct or indirect impacts on the Terrestrial Critical Biodiversity Area to the north and east. Although being within an Aquatic Critical Biodiversity Area (EFZ), the aquatic specialist confirmed that the proposed dwelling will have negligible impact on the Estuarine Functional Zone considering that it is located within an already transformed area, above the 1:100 year flood line (on stilts / pillars and 5.5m above MSL). The preferred locality of the primary dwelling & associated services infrastructure is outside any endangered / critically endangered ecosystem and falls on a portion of the property that is completely transformed (Figure 18).</p>	
	
<p>Figure 18: Photos illustrating the position of the proposed dwelling (yellow circles: surveyed pegs). As seen above, the proposed dwelling will be located on a grassed area outside Terrestrial CBA and Albany Thicket (CR) to the North and East.</p>	
7.	<p>Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.</p>
<p>The proposed dwelling extends into the Coastal Management Line and Coastal Protection Zone. All services infrastructure (conservancy tank & rainwater tank) is located outside/inland from the Coastal Management Line but remains inside the Coastal Protection Zone (Figure 19).</p>	

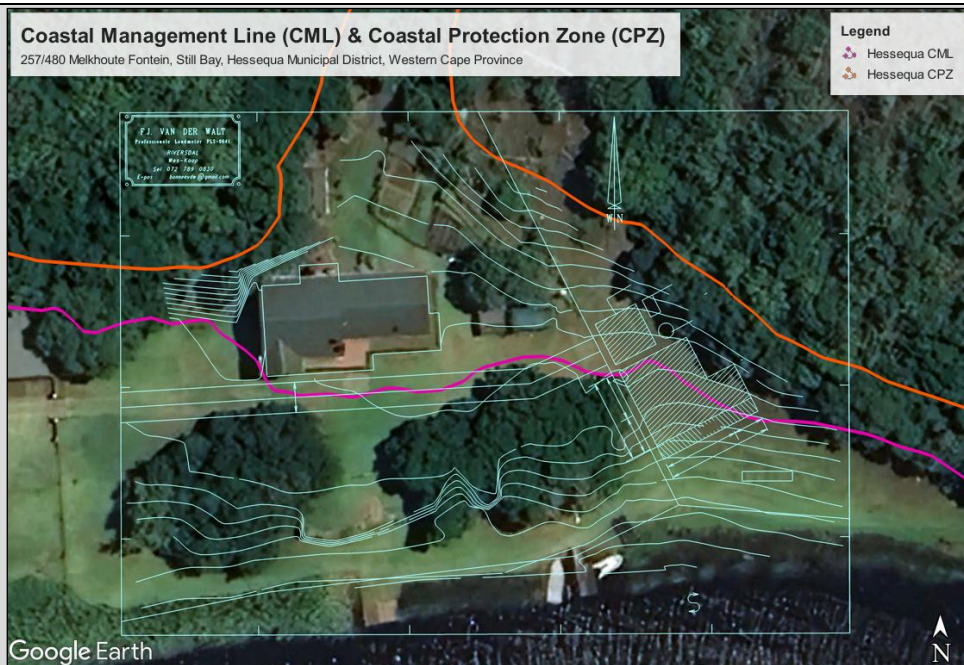


Figure 19: Coastal Management Map with SDP overlay.

It is noted that the property is situated approximately 12km upstream from the river mouth thereby reducing the potential for increased, long-term estuarine fluctuation levels although flooding remains a risk. Cognitive of the risk, the Applicant appointed WML Coastal Engineers to conduct a Flood Line/Estuarine Study to best inform the site selection and design-layout. The location and design of the dwelling has subsequently been designed as per the recommendations from the coastal engineers to reduce the risk of flooding / affecting estuarine processes.

In addition to the above, an aquatic specialist was appointed to conduct an Aquatic Impact Assessment to assess potential negative impacts given that the site is located within the Estuarine Functional Zone of the Goukou Estuary. The specialist confirmed that the development footprint of the proposed dwelling & associated services infrastructure will not result in any modification to the functional estuarine habitat/processes. The preferred site location and design is therefore acceptable from a coastal engineering, as well as an aquatic habitat perspective.

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.
----	--

The screening tool report has not changed from the one submitted with the Notice of Intent form.

9.	Explain how the proposed development will optimise vacant land available within an urban area.
----	--

The property is not located within an urban area.

10.	Explain how the proposed development will optimise the use of existing resources and infrastructure.
-----	--

The proposed development will make use of an **existing access road** (no need to construct a new access). The Applicant has registered a servitude right of way across 132/480 along the existing track to secure access to the proposed dwelling.

The proposed development will make use of an **existing three (3) phase Eskom connection** (no need for the installation of new electrical lines) (Figure 20).



Figure 20: Existing Eskom connection available on site (yellow circle). Blue circle: approximate locality of the primary dwelling.

The proposed development will also make use of an **existing borehole** for as Schedule 1 water supply for household use and purposes.

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).
-----	--

According to Hessequa Municipality (Civil Planning), they will only approve Conservancy Tanks since there are no municipal waterbourse sewage in this area (to be emptied on request). It was previously proposed to make use of a French Drain System for sewage, but was changed upon feedback from the Municipality and also to reduce the risk of possible contamination and pollution of the estuarine environment over time.

Solid waste collection by the Municipality is on Thursdays from 08h00 to 16h00. Solid waste must be placed at the farm gate / entrance for collection.

Written services confirmation from the Municipality will be included in the Final Basic Assessment Report.

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 (time)

Is the land use considered within the timeframe intended by the existing approved Spatial Development Framework (SDF)? (I.e. is the proposed development in line with the projects and programmes identified as priorities within the credible IDP?)

Yes, the proposed single residential dwelling is allowable in terms of the zonation and land use, as well as the location. It is a low impact, low density development that has taken into account all reasonable measures provided by specialists/consultants familiar with flood/estuarine/coastal environments.

Should the development occur here at this point in time?

The Applicant specifically purchased the cadastral unit on which the preferred site location is earmarked, to be able to develop his primary dwelling. The specific area was part of a smaller cadastral unit (with a right for a primary dwelling) which the Applicant then consolidated with his much larger farm property (with a right for a primary dwelling). By consolidating the two properties, the Applicant effectively 'sacrificed' the primary right to a dwelling on the larger farm unit, in favour of the one on the smaller cadastral unit.

Proximity to the river and the immediate neighbouring dwelling where their extended family property and house is situated, are key site selection aspects taken into account by the Applicant to his preferred site for the primary dwelling. In addition, existing services and access point to the river (for launching of ski boats) further supports his site selection. The preferred site is also void of natural vegetation and there is no need to further remove estuarine/riparian vegetation when developing in this location.

The Applicant acknowledges the site falling within the EFZ and subsequently the flood risk associated with this location. To minimise and mitigate the potential for flooding, the Applicant has instructed for a specific design that will result in minimal excavation, vegetation removal and/or not cause detrimental impacts on estuarine processes, whilst minimising the risk of flooding and any threat to livelihoods with the house being elevated above the 1:100 year flood line and 5.5m above MSL.

Although some of the alternative site locations on the farm avoids flood risk, these locations have increased levels of impact for vegetation removal and loss of habitat (both terrestrial and riparian).

Does the community / area need the activity, and the associated land use concerned?

The development of the single residential dwelling does not support any community needs. The development is intended as a private home.

Are the necessary services with adequate capacity currently available?

Yes -

Water: Borehole supply (residential use) & purified bottled water (drinking water) & rainwater.

Sewage: Conservancy Tank to be emptied by either the municipality or private service provider.

Electricity: A three phase Eskom connection is available on-site and will be connected to.

Solid Waste: Normal household waste (recyclable and non-recyclable) will be delivered at the main farm gate where it will be collected by the Municipality per their collection schedule of the rural areas in proximity to Still Bay. Garden refuse is limited mostly to grass clippings of the existing lawn and will be managed on-site in such a way that it does not pose a fire hazard.

Is this development provided for in the infrastructure planning of the municipality?

Municipal solid waste removal extends to the farming areas in proximity to Stilbaai and solid waste from this household will be collected by the Municipality as per their collection schedule. Water, electricity and sewage are not municipal functions and these are provided privately.

Is this project part of a national programme to address an issue of national concern or importance?

No.

Desirability (place)

Is the development the best practicable environmental option for this land / site?

Development in an area that is flood prone, albeit extended flood periods only i.e. 1:50 year and 1:100 year flooding is not deemed best practice in terms of environmental policy and/or spatial planning policy due to the increased risk of flood damage and/or risk of injury/livelihoods. There is ample evidence of continuous damage to structures/infrastructure, as well as loss of life when development is located within flood prone areas, especially when such areas are also exposed to future climatic changing conditions inclusive of sea level rise.

For this reason coastal setback and risk lines were developed for coastal towns in our region into Section 25 of the Integrated Coastal Management Amendment Act (ICMA) requiring such risk lines to be acknowledged and implemented into Local Spatial Development Proposals/Policies.

The 2024/2025 Hessequa SDF therefore makes specific provision for the following parameters which land owners/applicants must take into account and/or implement to reduce the risk:

- Utilize suitable foundation systems such as piles, pillars, or elevated platforms to elevate structures above potential flood levels and mitigate risks associated with coastal flooding and inundation.
- Increase the elevation of the lowest floor of buildings to reduce the risk of flooding and water damage during coastal storms and high tides. This elevation helps protect critical infrastructure and habitable spaces from inundation.
- Consider limiting or avoiding the construction of basements in areas prone to coastal hazards to prevent water infiltration and structural damage.
- Minimize the overall development footprint to reduce the ecological impact on coastal ecosystems and sensitive habitats. Optimize site layout and building design to maximize open space, preserve natural features.
- Design consolidated access points and vehicular routes to minimize the number of entry and exit points along the coastal boundary and areas that are susceptible to flooding/erosion.

The design of the structure, as well as the layout for the dwelling, adheres to the above-mentioned parameters.

The outcome of the independent specialist studies, having considered the proposed Preferred Alternative, takes into consideration the environmental sensitivities/slopes and the requirements of the applicant and is considered to be a negligible significance.

Would the approval of this application compromise the integrity of the existing approved and credible municipal IDP and SDF?

No. The proposal is consistent with spatial policies and objectives in relation to primary dwelling rights on agriculturally zoned land and the design have adhered to the minimum parameters as stipulated for flood prone areas as per the SDP (2024/2025).

Would the approval of this application compromise the integrity of the existing approved environmental management priorities for the area?

No. The construction of the single residential dwelling will be done with an approved Environmental Management Plan with mitigation measures to avoid compromising the environmental management priorities for the area. Through design the dwelling will not compromise or contribute to risk factors already identified in terms of the Estuarine Management Plan.

How will the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas?

The proposed development will have a negligible impact on the receiving environment with potential sensitive natural/cultural component having been avoided and/or mitigation provided for to minimise impacts.

How will the development impact on people's health and wellbeing?

The site will not negatively impact on people's health and wellbeing. It is private property, and the activities are consistent with the current rural land use whilst the Applicant must take all responsibility for potential damages as a result of flooding that may impact on his/his family's health and/or wellbeing.

Will the proposed activity or the land use associated with the activity applied for, result in unacceptable opportunity costs?

No. The property is owned and managed privately by the Applicant and the activity applied for constitutes primary rights which have accounted for environmental aspects in the broad definition.

Will the proposed land use result in unacceptable cumulative impacts?

No. The design is such that it will not cause additional detrimental cumulative impacts on the estuarine processes/natural habitat/environmental features.

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.

(a)	fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of-			
(i)	the site where the activity to which the application relates is or is to be undertaken; and	YES	EXEMPTION	
(ii)	any alternative site.	YES	EXEMPTION	
(b)	giving written notice, in any manner provided for in section 47D of the NEMA, to-			
(i)	the occupiers of the site and, if the applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	YES	EXEMPTION	
(ii)	owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	YES	EXEMPTION	
(iii)	the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;	YES	EXEMPTION	
(iv)	the municipality (Local and District Municipality) which has jurisdiction in the area;	YES	EXEMPTION	
(v)	any organ of state having jurisdiction in respect of any aspect of the activity; and	YES	EXEMPTION	
(vi)	any other party as required by the competent authority;	N/A	YES	EXEMPTION
(c)	placing an advertisement in-			
(i)	one local newspaper; or	YES	EXEMPTION	
(ii)	any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;	N/A	YES	EXEMPTION
(d)	placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken.	N/A	YES	EXEMPTION
(e)	using reasonable alternative methods, as agreed to by the Department, in those instances where a person is desirous of but unable to participate in the process due to-	N/A	YES	EXEMPTION
	(i) illiteracy; (ii) disability; or (iii) any other disadvantage.			

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

Basic Assessment Process

This Pre-App DBAR is available for a 30-day review & commenting period, extending from **Tuesday, 24 June 2025 to Wednesday, 23 July 2025**.

Refer to Appendix F for copies of notifications & stakeholder register. Report will be updated with comments received once the comment period on Pre-App Draft BAR ends.

- Neighbouring property owners were identified using CapeFarmMapper,
- Select neighbouring property owners were compiled into a list sent to the Hessequa Municipality for confirmation of contact details as 'direct neighbours',
- Key Authorities were identified according to whether or not they have a mandated interest in the area/site;
- Local Councillor was verified with the Hessequa Municipality;
- Site Notices were placed at the farm gate, 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 appears in the *Suid-Kaap Forum* for I&AP's to register and submit comment on the Pre-App DBAR.

Comments received in response to the **Pre-App DBAR** will be considered and incorporated in the Draft Basic Assessment Report. Comments received in response to the **Pre-App Draft BAR** and **Draft BAR** will be considered and incorporated in the **Final BAR**.

Planning Process

An Application for the **Permanent Departure** [in terms of section 15(2)(b) of the Hessequa Municipality: By-law on Municipal Land Use Planning, 2015, (P.N. 287 of 2015)] of the western boundary line from 30m to 1m, to allow for the construction of the new primary dwelling has been submitted to the Hessequa Municipality. The purpose of the application is to obtain the required land use rights to construct a main dwelling on the subject property. A planning motivation report is attached as Appendix G6 of the Pre-App DBAR.

The planning motivation report is being circulated with this Pre-App Draft BAR for a 30-day review & commenting period. Any written comments on the planning motivation report must be submitted to the Planner (danette@nuplanafrika.co.za) and Hessequa Planning Department (landuse@hessequa.gov.za) on or before 23 July 2025.

3. Confirm which of the State Departments and Organs of State indicated in the Notice of Intent/application will/have been consulted with.

- Garden Route District Municipality
- Cape Nature
- Heritage Western Cape
- Department of Agriculture
- BOCMA (Breede-Olifants Management Catchment Agency – Water Affairs)
- Hessequa Municipality
- DEA&DP: Coastal Management
- Department of Forestry
- Department of Health
- Provincial Roads
- Ward Councillor

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

Department of Defence – 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 the Department of Defence is not necessary.

SACAA – The dwelling 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 development of one dwelling does not pose a threat to air traffic, there are no reasonable grounds to conduct any specialist studies to confirm this and no need for consultation with SACAA.

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

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.

All issues raised by I&APs will be summarised in the Draft 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.		
Confluent Environmental (aquatic ecology).			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		

The site falls immediately adjacent to the Goukou River which originates from the Langeberg Mountains to the north of Riversdale and flows in a southerly direction, before forming the Goukou Estuary at Still Bay. According to the aquatic specialist, the site is within a transformed Estuarine Functional Zone of the Goukou Estuary (transformed from natural & estuarine vegetation into agricultural).

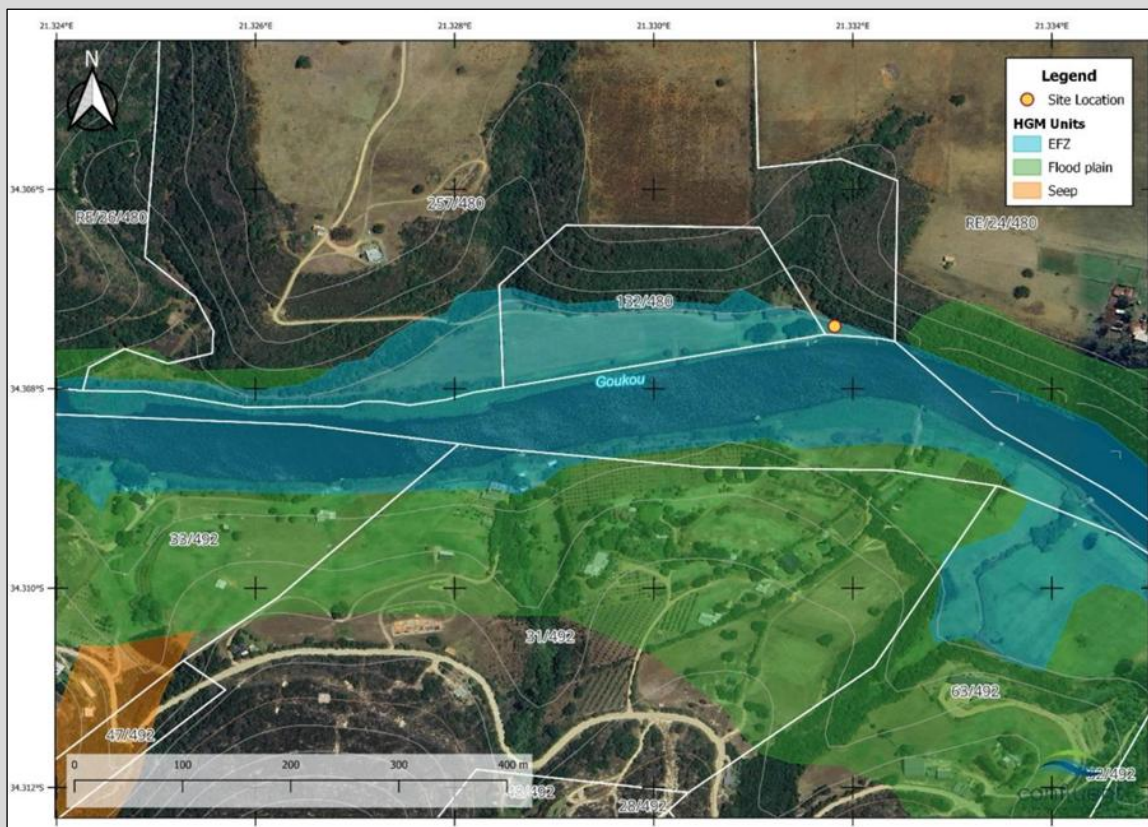


Figure 21: Mapped estuarine and wetland habitats (Confluent Environmental, 2025).

The present ecological status of the Goukou Estuary is **C (Moderately Modified)**, indicating that loss of natural habitat and biota has occurred but the ecosystem functions are unchanged. It's ecological importance is regarded as being **High**. Therefore, the Applicant appointed both WML Coastal Engineers and the Aquatic Specialist to best inform the layout of the dwelling in order to assess and avoid/mitigate potential negative impacts.

The aquatic specialist assessed both construction phase impacts & operational phase impacts which are summarised below:

1. Transformation of habitat within the EFZ of the Goukou Estuary (Construction).

According to the specialist, the dwelling will occur within a transformed section of the Goukou EFZ which offers limited habitat options for estuarine biota. No part of the development will occur within the river and no aquatic biota are expected to be adversely impacted. It is therefore unlikely that this development will significantly affect the ecological or functional attributes of the broader estuarine system. Significance after mitigation: **Negligible**.

2. Erosion and sedimentation caused by clearance of vegetation during construction (Construction).

Clearing of vegetation will expose soil which may be vulnerable to erosion resulting in sediment input into the estuary and smothering and die-back of estuarine vegetation. The specialist provided a list of silt & erosion control measures to reduce the significance of impact to **Negligible**. These mitigation measures are included in the Environmental Management Plan (EMP).

3. Disturbance of estuarine & coastal habitat caused by general construction activities (Construction).

The proposed location of the dwelling is located immediately adjacent to sensitive estuarine and habitat. The specialist provided a list of mitigation measures to reduce the significance of impact to **Negligible**. These mitigation measures are included in the Environmental Management Plan (EMP).

4. Impedance and diversion of flood flows (Operational).

Elevating the proposed dwelling (on silts / pillars) will allow flood water to pass beneath the building and will minimise the risk of flood damage, scouring and erosion (i.e., **Negligible** SEI).

In conclusion, the development will not result in any modification to the functional estuarine habitat and is considered acceptable from an aquatic biodiversity perspective.

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.		
WML Coastal Engineers conducted a Flood Line /Estuarine Coastal Study to best inform the layout/design parameters.			
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.		
The Integrated Coastal Management Act, 2008 (Act No. 24 of 2004) ("NEM:ICMA") is a specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"). The NEM:ICMA sets out to manage the nation's coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment.			

In terms of Section 38 of the NEM:ICMA, the Department of Environmental Affairs and Development Planning is the provincial lead agency for coastal management in the Western Cape as well as the competent authority.

The proposed dwelling is located within the Coastal Management Line and Coastal Protection Zone. All services infrastructure (conservancy tank, rainwater tank & parking) is located just outside the Coastal Management Line but remains inside the Coastal Protection Zone (Figure 22). The **design parameters** for the dwelling is such that the risk for potential flooding, taking into account future sea level rise impacts, is significantly reduced with the structure being **elevated** so as to avoid impacting on estuarine processes, as well as being **raised** to avoid flooding. No additional structures are proposed within the **aquatic buffer area** as determined by the aquatic ecologist.

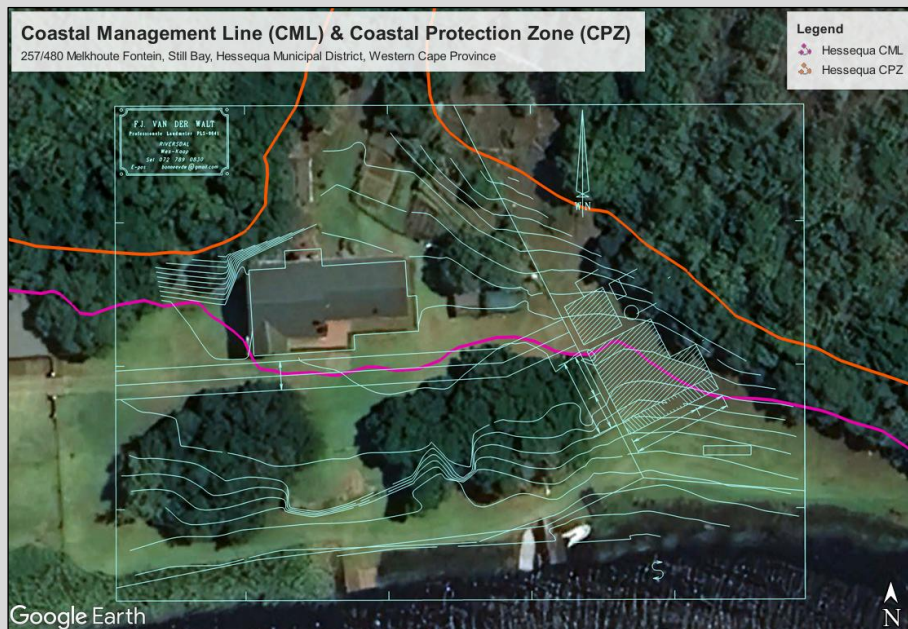


Figure 22: Coastal Management Map with SDP overlay.

Taking the above into account, the Applicant appointed WML Coastal Engineers to conduct a Flood Line Study to best inform the layout (Figure 23).

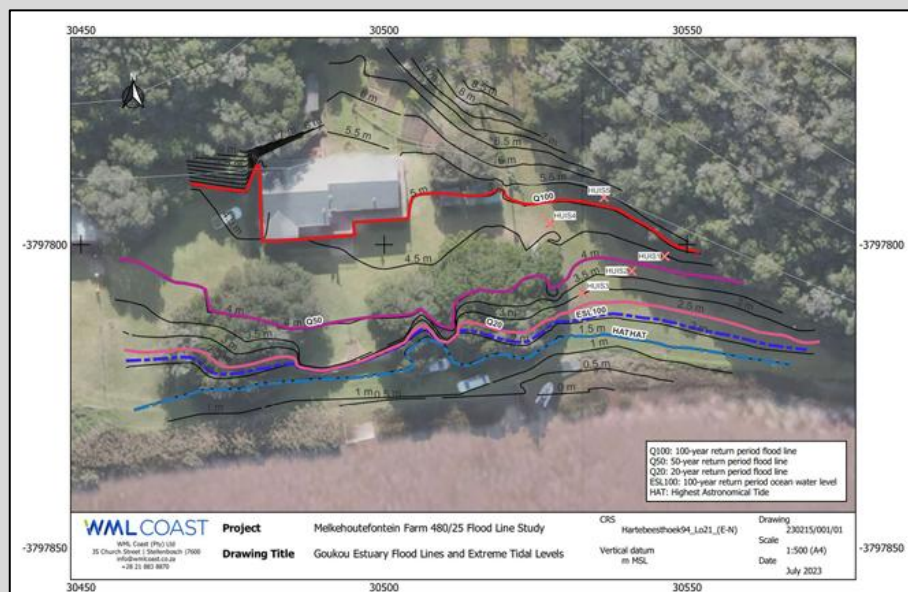


Figure 23: Goukou Estuary Flood Lines and Extreme Tidal Levels (WML Coast).

WML Coast provided the following recommendations:

- The dwelling should be built on piled supports (pillars).
- The floor level of the dwelling should be above the 1 in 100-year flood level to limit flood risk.
 - To account for the future 1 in 100-year flood event the floor level should be above 5.5 m MSL.
- Riverbank scour could result in undermining of the foundations of the house.
 - The design of the house should consider potential scour of the riverbank due to flood events.

The SDP and design are according to the above recommendations.

The Pre-App Draft BAR will be circulated to I&APs for a 30-day review & commenting period. The DEA&DP: Biodiversity and Coastal management has been approached for comment.

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

The Goukou Estuary Management Plan identified five (5) key management priorities for which key management objectives were defined:

1. Water quantity and quality;
2. Recreational activities;
3. Living resource management;
4. Land use and development (including mitigation for environmental hazards); and
5. Funding and educational awareness.

The most relevant management actions that are aligned to the above objectives and that are applicable to the proposed development include the following:

- Action 3.1: Ensure appropriate development in and around the Goukou River estuary through environmental authorization and implementation of IDP/SDF - considering ecosystem services and sense of place. Key indicators include:
 - Spatial zonation and prescription of the Goukou River EMP captured in the IDP and SDF.
 - Goukou River Environmental Advisory Forum (EAF) registered as an Interested & Affected Party for all development and rezoning applications.
 - Database of all new developments and comment made by Goukou River EAF through EIA process.
 - Developments tabled at EAF meetings.
 - Construction sites monitored for compliance with environmental authorisation and approved environmental management plan.
- Action 3.2: Develop appropriate setback lines for development that considers major floods and sea level rise for inclusion into the IDP/SDF. Key indicators include:
 - Coastal management lines developed and gazetted.
 - Coastal management lines incorporated into IDP & SDF.
 - Development excluded from sensitive areas, including EFZ.
 - Applicable building controls applied to high risk areas.
 - Aquatic buffer area determined by specialist in addition to the flood line and risk management parameters provided by coastal engineers.

The proposed development is aligned with Action 3.1 in that it considers factors including spatial zonation (primary dwelling), the registration of the DEADP: Oceans & Coast as an I&AP (all comments will be considered and included in the Final BAR) and that the Applicant will be compliant with the EA and EMP once approved.

Although the construction of the dwelling is not aligned with Action 3.2 in terms of development to be excluded from an Estuarine Functional Zone, development will be outside sensitive areas delineated by the aquatic specialist as well as the coastal engineer. The aquatic specialist delineated a construction phase buffer to be avoided during the construction phase. All construction related activities (i.e., stockpiling,

excavation) must be outside the delineated buffer area (included in the EMPr – construction phase only). It is noted that the very front pillars of the stoep of the house partially extends into this aquatic construction buffer. Dr James Dabrowski was consulted in this matter and he confirmed that the installation of the pillar in this area will not affect/change the outcome of his specialist investigation, on condition that the buffer area otherwise remain free of structures/infrastructure.

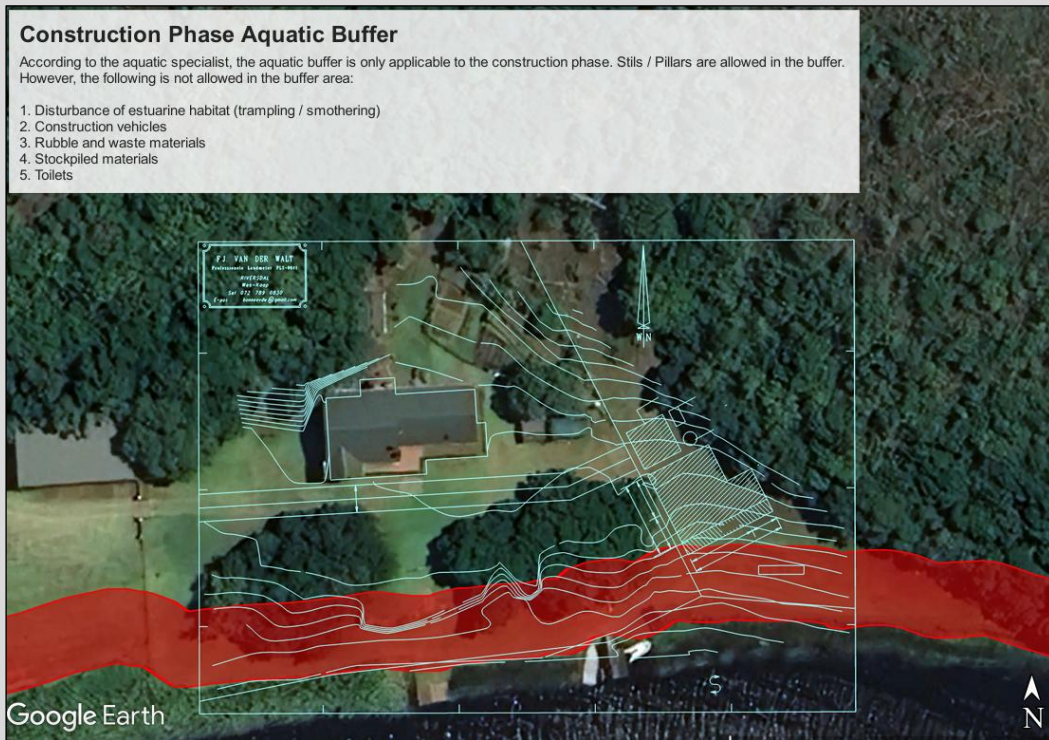


Figure 24: Map indicating aquatic buffer area (construction phase).

3.5. Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.

The proposed dwelling is located within the Coastal Management Line and Coastal Protection Zone. All services infrastructure (conservancy tank & rainwater tank) is located outside the Coastal Management Line but remains inside the Coastal Protection Zone (Figure 25).

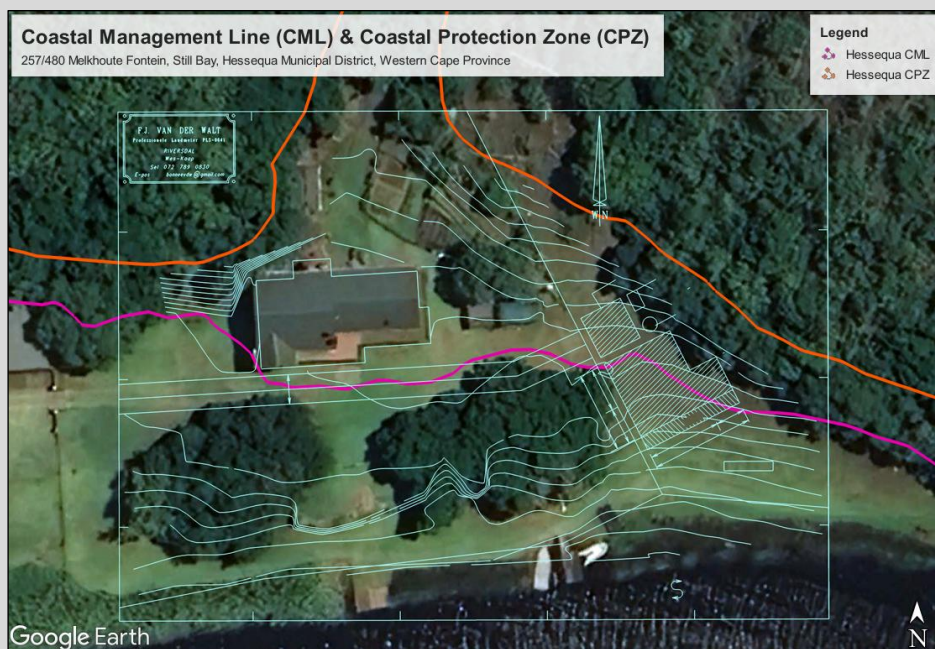


Figure 25: Coastal Management Map with SDP overlay.

Taking the above into account, the Applicant appointed WML Coastal Engineers to conduct a Flood Line Study to best inform the layout. The SDP is designed as per the recommendations from the coastal engineers.

In addition to the above, an aquatic specialist was appointed to conduct an Aquatic Impact Assessment to assess potential negative impacts given that the SDP is located within the Estuarine Functional Zone of the Goukou Estuary. The specialist confirmed that the development footprint of the proposed dwelling & associated services infrastructure will not result in any modification to the functional estuarine habitat. The SDP is considered acceptable from an aquatic biodiversity perspective (Figure 25).

Design parameters must be adhered to, as well as the construction aquatic buffer.

4. Biodiversity

4.1.	Were specialist studies conducted?	YES	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		
Confluent Environmental.			
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>Biodiversity Informants used by the Botanical/Biodiversity Specialist:</p> <ul style="list-style-type: none"> • DFFE Screening Tool Listed SCC • Information on plant occurrence prior to the site visit was sourced from SANBI's Botanical Research and Herbarium Management System (BRAHMS) for the Plants of Southern Africa (POSA) database. • iNaturalist observations of the property and surrounding areas. • Specialist insight into the species likely present in the area. • The 2018 updated South African National Vegetation Map from SANBI's Biodiversity GIS (BGIS) database, and the National Biodiversity Assessment report of 2018 (Skowno et al., 2018). • Shapefiles for the Western Cape Biodiversity Spatial Plan (WC-BSP) i.e., information on PAs, CBAs, ESAs, and ONAs were downloaded from BGIS database (CapeNature, 2017; Pool-Sandvliet et al., 2017). • Cape Farm Mapper for additional spatial information required for the site. • Chief Directorate: National Geo-spatial Information (CD: NGI) Geospatial Portal and Google Earth for the acquisition of historical aerial imagery of the site. • The conservation status of ecosystems was found in the Revised National List of Ecosystems that are Threatened and in need of protection, published under the National Environmental Management: Biodiversity Act (Act No. 10, 2004, as revised in Nov. 2022), and also by using the Vegetation of South Africa, Lesotho, and Swaziland (Mucina & Rutherford, 2006). <p>Site- and species-specific surveys conducted by the specialist to determine applicability and correctness of the Screening Tool.</p>			
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.		
<p>The preferred locality of the dwelling & associated infrastructure will not have direct or indirect impacts on the Terrestrial Critical Biodiversity Area to the north and east. Although being within an Aquatic Critical Biodiversity Area (EFZ), the aquatic specialist confirmed that the proposed dwelling will have negligible impact on the Estuarine Functional Zone considering that it is located within an already transformed area above the 1:100 year flood line (on stilts / pillars). The preferred locality of the primary dwelling & associated services infrastructure is outside any endangered / critically endangered ecosystem (Figure 26).</p>			

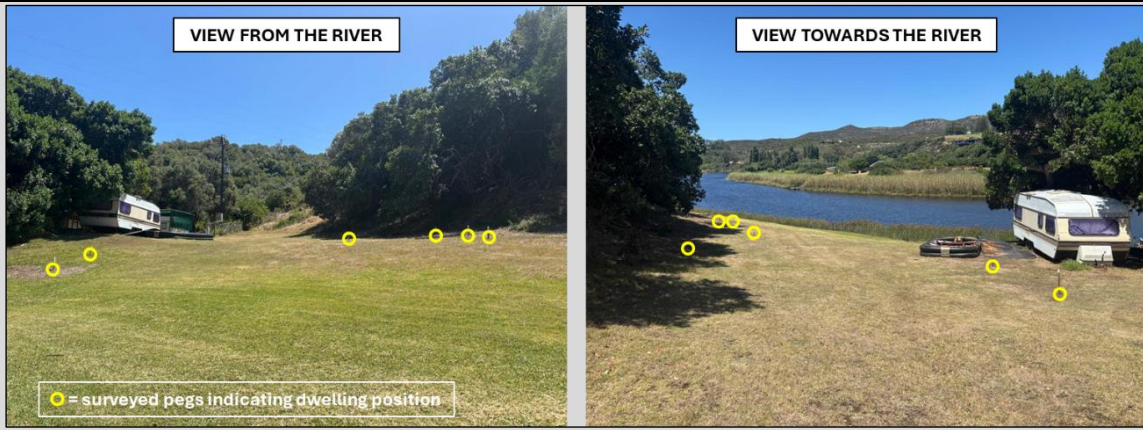


Figure 26: Photos illustrating the position of the proposed dwelling (yellow circles: surveyed pegs). As seen above, the proposed dwelling will be located on a grassed area outside Terrestrial CBA and Albany Thicket (CR) to the North and East.

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.

- No impact on Estuarine habitat.
- No impact on Endangered or Critical Endangered Ecosystems.
- No impact on Terrestrial & Aquatic CBA's.
- No impact on Agricultural resources.

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 within a protected area.

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

The screening tool identified the sensitivity for animal species (fauna) as "high" for the following specie:

Sensitivity	Feature(s)
High	Aves-Bradypterus sylvaticus
High	Aves-Circus ranivorus
Medium	Aves-Podica senegalensis
Medium	Aves-Circus maurus
Medium	Aves-Stephanoaetus coronatus
Medium	Aves-Hydroprogne caspia
Medium	Aves-Neotis denhami
Medium	Aves-Afrotis afra
Medium	Insecta-Chrysoritis brooksi tearei
Medium	Invertebrate-Aneuryphymus montanus

A SACNASP registered fauna specialist conducted a Site Sensitivity Verification of the proposed development site and confirmed the following:

- The entire development footprint is already transformed with very little to no natural habitat left on-site.
- No fauna SCC were found on-site during the site inspection and the presence is confirmed to be unlikely.
- The proposed activity is not expected to have an impact on species of conservation concern (SCC) beyond the boundary of the preferred site.

5. Geographical Aspects

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

The preferred site location is located at the lowest point of the (original) cadastral unit that was subsequently consolidated with the much larger farming unit. The available space on this portion of the property where it is sufficiently flat to development a primary dwelling, is located close to the Goukou River and due to steep slopes in the landscape directly behind, the location is effectively fixed between the steep slope and the river.

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.		
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		

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.

None 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.		
<p>The zoning of the subject property is Agriculture Zone I. The property is currently used for small scale farming; the old agricultural fields are used for the grazing of sheep. There are currently two existing structures on the property and includes:</p> <ul style="list-style-type: none"> • A labourer's dwelling with a total floor area of 101,97m² which was approved in 2012. • A storage building (storage of farming equipment). <p>The surrounding area is rural in nature and includes farms for agricultural (intensive agricultural production), farms with smaller scale agricultural activities, farms with tourist facilities and accommodation as well as lifestyle farms), tourism, natural (private nature reserves and natural areas), Goukou River and roadways.</p>			
8.2.	Explain the socio-economic value/contribution of the proposed development.		
Temporary employment during the construction phase of the proposed development.			
8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.		
Not Applicable.			
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>The following potential impacts may impact on people's health and well-being:</p> <ul style="list-style-type: none"> • Temporary noise during construction – this will be mitigated by managing construction work hours and health and safety on the construction area. Due to the isolation of the property, this is likely to be negligible. 			

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.

Preferred Property: Portion 257 of Farm Melkhoute Fontein No. 480, Still Bay, Hessequa Municipal District, Western Cape Province.

Preferred Site: Adjacent to the Goukou River and in close proximity to the existing primary dwelling on 132/480 (family-owned) with existing services infrastructure² (electricity & water) (Figure 27) (Figure 28).

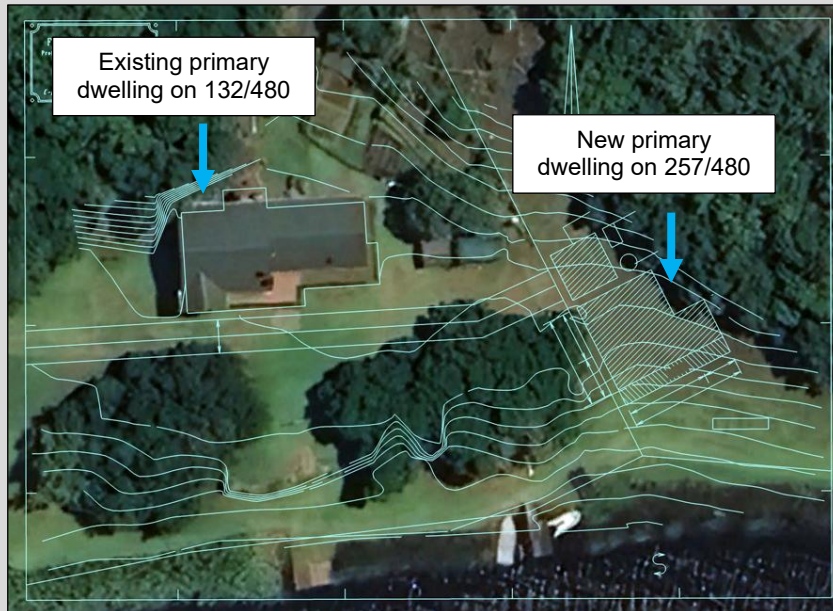


Figure 27: Preferred Site Alternative of the New Primary Dwelling on 257/480 Melkhoute Fontein that is situated in close proximity to their extended family house on the neighbouring property from where existing services and access to the river are already in existence.

² The subject farm property (257/480) is owned by “Ellis Farming Enterprises CC” and members of this CC are two brothers. The neighbouring farm property (132/480) is owned by “John & Kinna Familie Trust” of which the same two brothers and their sister are the trustees and beneficiaries. Hence, the two farm properties is in family ownership. Portion 132/480 has an existing primary dwelling with existing services infrastructure (electricity & water) which is one of the reasons for the preferred locality of the new primary dwelling (adjacent to the existing primary dwelling on 132/480).



Figure 28: Preferred Site Alternative next to the Goukou River and adjoining their extended family residence on the neighbouring cadastral unit.

Provide a description of any other property and site alternatives investigated.

No other property alternatives were investigated as the property is owned by the Applicant.

Following a Pre-Application meeting with DEA&DP (20 May 2025), it was advised that other site alternatives be investigated for the proposed new dwelling.

Four (4) site alternatives were considered (Figure 29 – A, B, C & D).



Figure 29: Locality Alternatives considered on 257/480 Melkhoute Fontein.

Site Alternative A (Preferred Site Alternative): Adjacent to the Goukou River and in close proximity to the existing primary dwelling which is that of extended family on 132/480. The location is approximate to where the primary dwelling for the (pre-consolidated) cadastral property would have been. Direct access to existing services infrastructure shared with the neighbouring dwelling. Existing shared access readily available without the need to create additional access. Proximity to the river for recreational purposes. Usage of existing access point (for boats/canoe's) to the river. Area has been utilised by the family for years (and before being purchased, by the previous land owner for decades) for temporary accommodation over the holiday periods. The site is completely transformed and void of remaining natural vegetation. The site does not require the removal of riparian vegetation or terrestrial natural vegetation. Although below the 1:100 flood line and possibly exposed for long-term flooding, the site is sufficient level to enable the Applicant a design (for the dwelling) that can ensure that the structure is elevated above the 1:100 year flood line and 5.5m above MSL to mitigate flood risk.

Site Alternative B (Non-Preferred Site Alternative): Adjacent to the Goukou River, but further from the existing shared river access for recreational purposes. Likewise the site is not close to the existing extended family home which is important to the Applicant for when they visit the area. This site will require extended services in the form of new water lines to be installed, as well as an extension of the overhead electrical lines along the river front. Similar to Site A, this site falls below the 1:100 flood line and will require similar specific design parameters to ensure that the structure is elevated above the flood/risk lines. Similar to Site A, the site is largely void of remaining natural vegetation and biophysical impacts will therefore be similar. However the riparian vegetation in front of Site B consist of high reeds which obscures a portion of the river. It is a well-known reality that river front properties maintain or remove riparian vegetation to optimise their view. Site A does not have any natural riparian vegetation (it was removed over time by the previous land owner and maintained as such by the current land owner). An indirect impact associated with Site B (and not Site A) is therefore the likelihood of long-term removal/maintenance of riparian vegetation which is not supported in terms of the Estuarine Management Plan.

- The Site B alternative does not negate the potential risks associated with flooding/climate change impacts and is therefore deemed similar to Site A.
- Because the site is also transformed, the biophysical impacts are similar to that of Site A.
- Additional infrastructure to water and electrical cabling with associated excavation as well as installation cost.
- Potential for long-term impact on riparian vegetation to optimise views of the river and to access the river.

Site Alternative C (Not Preferred and deemed not a reasonable or feasible alternative by the Applicant):

This location is too far away from the river (limited river views and accessibility), it is located some distance from the extended family home and this locations would make it challenging for the Applicant to easily access the existing river access point with their boat/canoes given that the existing road leading down from the hillside down to the river is steep and frequent trips with a boat-in-tow up and down the steep road is not deemed safe by the Applicant. To achieve a river view, the position must be in close proximity to the existing labourer cottage and shed. The Applicant does not wish to live in such close proximity to non-related employees when visiting, when the preferred alternative can satisfy his preference without compromising environmental features and implementing practical design parameters to reduce flood risk.

This location does not achieve the intended outcome of the Applicant wanting to be close to the river for recreational use over the holidays and also close to his extended family when visiting.

Site Alternative D (Non-Preferred and deemed not a reasonable or feasible alternative by the Applicant): Being located within agricultural fields used for grazing, Site D is too far away from the river for regular recreational use as well as limited river views. It is located some distance from the extended family home (not able to walk to visit, will have to drive) and this locations would make it challenging for the Applicant to easily/regularly access the existing river access point with their boat/canoes given that the existing road leading down from the hillside down to the river is steep and frequent trips with a boat-in-tow up and down the steep road is not deemed safe by the Applicant. Area D is regularly

utilised for agricultural practices i.e. ploughing for pastures and locating the house within the pastures will result in the house being surrounded with an otherwise sterile environment that will require them to implement considerable landscaping/gardening which they cannot maintain because of their seasonal presence only.

This alternative is not a reasonable, nor feasible alternative to the Applicant when the preferred alternative can satisfy his preference without compromising environmental features and implementing practical design parameters to reduce flood risk. This location does not achieve the intended outcome of the Applicant wanting to be close to the river for recreational use over the holidays and also close to his extended family when visiting.

Provide a motivation for the preferred property and site alternative including the outcome of the site selection matrix.

Site Alternative A is **most preferred** for the following reasons:

- Same location as what would have been for the smaller cadastral unit before the Applicant purchased and consolidated it with his larger farm unit (status quo impacts under primary rights which would have also necessitated design alternatives instead of location/site alternatives);
- Close to the extended family owned primary dwelling on the neighbouring farm property (132/480) which is an important consideration for the Applicant since their families visit each other regularly during the holidays and they do so on foot because of the close proximity (Figure 30).
- Close to existing services infrastructure:
 - Three phase Eskom connection already available on site (Figure 31).
 - Easy accessibility to water from an existing borehole (Figure 32).
- Existing registered servitude access (no need to construct a new access road) (Figure 33).
- Next to the Goukou River for optimal views (Figure 34).
- No need to trim / remove / maintain riparian vegetation along the banks for the river since it has been removed over time by previous land owners already.
- No need to remove sensitive terrestrial vegetation due to transformed nature.
- Separated from farming activities and not located within agricultural fields used for grazing.
- Environmental Sensitivities (Figure 34):
 - It is situated on a fragmented portion of the farming unit with no cropping potential and will not impact on any existing farming activities.
 - The proposed dwelling will not impact on aquatic biodiversity being (1) located outside the recommended aquatic buffer delineated by the aquatic specialist (2) designed on silts to be above the 1:100 year flood line of the Goukou River (5.5m).
 - The proposed dwelling will not result in the removal of highly sensitive biodiversity including Plant SCC being located on an already disturbed area (i.e., grassed area).
 - The proposed dwelling will not impact on any fauna SCC.



Figure 30: Existing family owned dwelling on 132/480 with existing access and services infrastructure (source: NuPlan Africa, 2025).

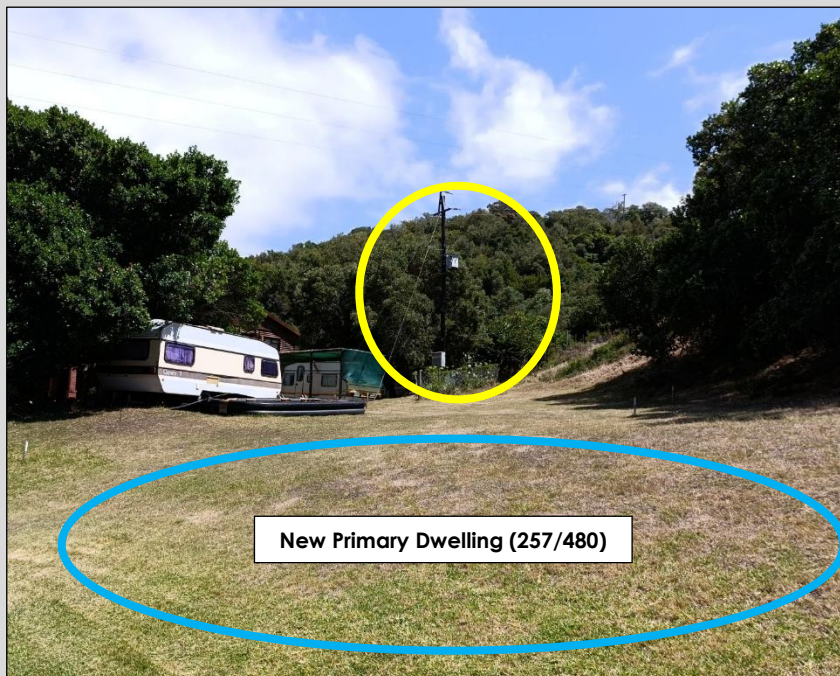


Figure 31: Eskom connection available on site (yellow circle). Blue circle: approximate locality of the primary dwelling.



Figure 32: Existing surface-laid water pipeline at the neighbouring farm property (132/480) which receives water from an existing borehole on 257/480.

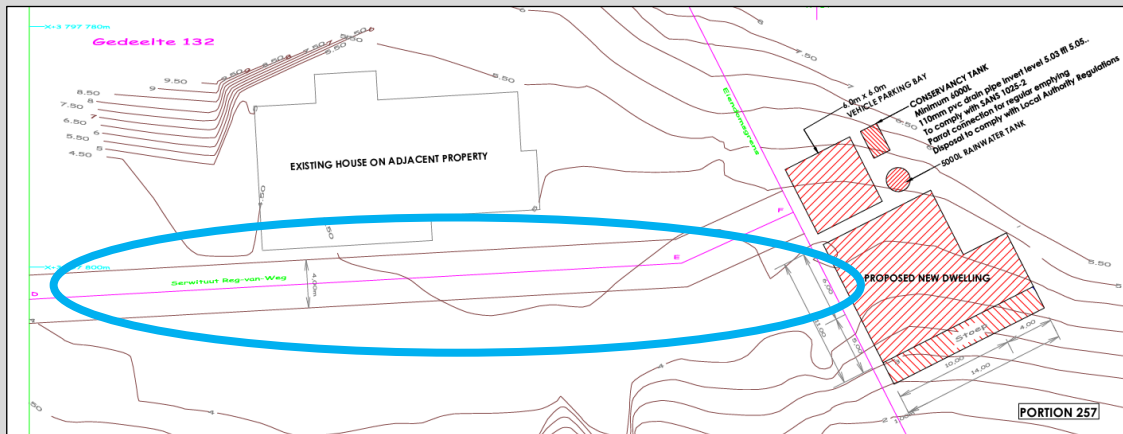


Figure 33: Blue Oval: Right of Access Servitude across 132/480 (family owned property).





Figure 34: Optimal view & easy access to the Goukou River. No environmental sensitivities within the development footprint.

Site Alternative B is a feasible site alternative given that it remains next to the Goukou River on a grassed area that will not result in additional impacts biophysically. However, this locality is **least preferred** considering that it is much further away from the family owned primary dwelling on 132/480 which will make it more costly to provide services that will have to be installed along the river front (Figure 35).

- New electrical lines & connection point must be installed.
- Longer water pipelines must be laid.

Views of the river is restricted with higher reeds/riparian vegetation along the edge of the river in this position (Figure 36).

Both localities are within the Coastal Protection Zone, within 100m of the high-watermark of the Estuary, within 32m of the edge of the watercourse and within the 1 in 100 year flood line (Figure 37) which will necessitate the same design parameters.

The key differences between locality A & B is that a portion of locality A is located within the Coastal Management Line whilst locality B is outside the Coastal Management Line (Figure 38) and long-term clearance/maintenance of riparian vegetation to optimise views and improve accessibility to the river.

According to the aquatic specialist, the significance of impact to the watercourse at Site Alternative B would not be lower than Site Alternative A. The significance ratings for both Site Alternatives are the same.



Figure 35: Locality Alternative B (least preferred). Yellow circle: locality of existing primary dwelling with existing services infrastructure (electrical & water) on 132/480.

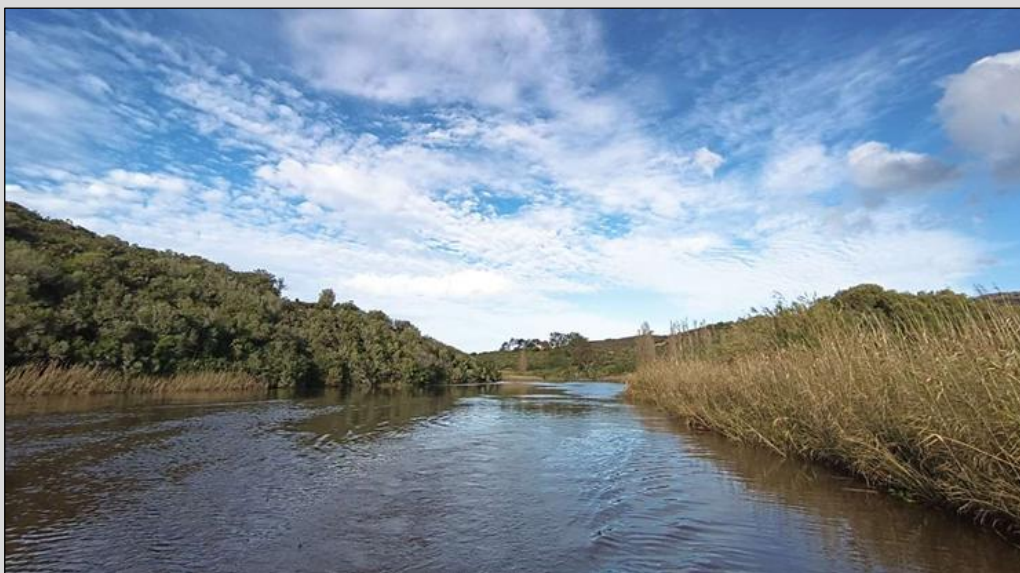


Figure 36: Higher riverbank reeds.



Figure 37: Left: water surface level for the Present 1 in 100 year flood line (WML Coast) at both localities. Right: Coastal Management Lines (red: Coastal Protection Zone; pink: Coastal Management Line).

Locality Alternatives C & D are **not feasible** site alternatives for the Applicant:

- Intended Purpose: The new primary dwelling is not fit-for-purpose being close to farming activities or being a permanent residence. It will be used on an ad hoc basis during the holiday seasons, hence the purpose being close to the existing family owned primary dwelling on 132/480 and next to the Goukou River for when the families visit the area.
- Although Alternative C can be directly accessed from the existing gravel road traversing the property, however it will be located within agricultural fields used for sheep grazing, far away from the river & family owned primary dwelling on 132/480, which is not the intended purpose of the dwelling (Figure 38).



Figure 38: Locality Alternative C - Agricultural grazing fields used for grazing in close proximity to existing buildings (labourer's cottage & storage building for the storage of farming equipment).

- Views of the Goukou River: Being a holidaying primary dwelling, Site Alternatives C & D do not provide optimal views of the Goukou River.
 - Alternative C ($\pm 300\text{m}$ from the river): Too far away to have any view of the river.
 - Alternative D ($\pm 120\text{m}$ from the river): Views of the river are obstructed by dense thicket vegetation along a steep cliff face southwards towards to the Goukou River (Figure 39).



Figure 39: Site Alternative D.

Accessibility to the Goukou River: It is also not an easy drive down to the river given the very steep slopes of the existing gravel road and taking into account such driving with boat-in-tow and/or regular for each time they would want to visit their extended family (Figure 40).



Figure 40: Steep gravel road down to the Goukou River (yellow circle).

Additional services costs & access: Site Alternative D would require the construction of a new access road through agricultural grazing fields. Both Alternatives C & D would require the installation of new electrical infrastructure whereby the primary dwelling on 132/480 already has an existing electrical connection point and water connection.

In addition to the above, Site Alternative D would result in the removal of secondary fynbos and additional plant species located in the surrounding area because of rotational farming practices that result in vegetation regrowth in-between ploughing/planting cycles (Figure 41) (Figure 42).





Figure 41: Fynbos Species at Site Alternative D.



Figure 42: Additional Plant Species found in proximity to Site Alternative D.

Provide a full description of the process followed to reach the preferred alternative within the site.

- The Applicant purchased the property (previously a separate cadastral unit from the larger farming unit) with the intent of developing his primary dwelling in the (same) position as what the primary dwelling would have been considered for the (pre-consolidation) property.
- The Applicant appointed WML Coastal Engineers to conduct a Flood Level /Coastal Study in order to best inform the optimal location, layout & design of the primary dwelling.
 - According to WML Coastal Engineers, the primary dwelling must be on stilts / pillars above the 1:100 year flood line (as per the Preferred SDP) to avoid/reduce potential flooding and estuarine processes.
- The Applicant also appointed an aquatic, agricultural, fauna & botanical/biodiversity specialist to assess any potential negative impacts associated with the proposed development of the primary dwelling:
 - According to the fauna & botanical/biodiversity specialist, the preferred site alternative will not impact on fauna or plant species of conservation concern (SCC).
 - According to the aquatic specialist, the preferred site will not impact on Aquatic CBA and Estuarine habitat/processes given that it is to be built on silts / pillars with minimal interference (above the 1:100 year flood line).
 - According to the agricultural specialist, the development will not lead to any loss of agricultural resources.

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

The Property is owned by the Applicant.

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

Preferred Property Alternative

- Positive
 - The Preferred Property is owned by the Applicant and the proposal remains within the primary rights of the property.

Site Alternatives A & B

- Positive
 - The primary dwelling will occur within a transformed section of the Goukou EFZ which offers limited habitat options for estuarine biota.
 - No part of the development will occur within the river and no aquatic estuarine biota are expected to be adversely impacted.
 - The primary dwelling will not impact on Terrestrial CBA, Endangered / Critically Endangered vegetation and Plant SCC.
 - The primary dwelling will not negatively impact on Fauna SCC.
 - (Site A) has unobstructed access to the river and has unobstructed views of the river and will not require additional clearing of riparian vegetation.
 - (Site A) will have shared services already.
- Negative
 - The dwelling is located in the 1:100 year floodline and there is a risk of flooding and scouring of the banks during the operational phase.
 - WML Coast provided measures to mitigate this potential negative impact.
 - Although the primary dwelling is located adjacent to Milkwood Thicket, some of the Milkwood Trees may need to be trimmed in future.
 - The Applicant must apply for a forestry permit.
 - (Site B) Potential long-term trimming/removal/maintenance of riparian vegetation to optimise views and accessibility to the river.

- (Site B) must install additional link services along the river front with additional costs.

Site Alternatives C & D

- Positive
 - Both site alternatives are located outside the 1:100 year flood line and therefore not prone to flooding or long-term climate change impacts.
 - Both site alternatives are outside the CPZ and CML.
- Negative
 - Neither sites have optimal views of the river.
 - Both sites are separated from the existing extended family home down at the river.
 - Both sites are separated from the river itself for recreational use.
 - Both site alternatives is located in old agricultural fields used for grazing.
 - (Site D) will result in the loss of secondary fynbos species.
 - Both sites will require extended services to be developed at cost.
 - Both sites will result in ridgeline development.

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

Provide a description of the preferred activity alternative.

The Applicant is proposing the construction of a single residential dwelling as per the rights allowed to the property which is zoned as Agriculture I. Nothing that by consolidating the two cadastral units previously, the Applicant effectively gave up the right for one primary dwelling in favor of the preferred site location.

Provide a description of any other activity alternatives investigated.

Although assessed, the No-Go Activity Alternative (status quo) is not deemed a reasonable alternative as it implies not permitting development of a primary dwelling, which is contrary to the applicant's constitutional property rights awarded to this zoning/property.

Provide a motivation for the preferred activity alternative.

The preferred activity is for the construction of a raised, single residential dwelling with limited supporting services and existing access, as per the primary rights allowed to the property under Agriculture Zone I.

Provide a detailed motivation if no activity alternatives exist.

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

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.

- One (1) Primary Dwelling
 - The dwelling will be constructed on stilts / pillars to be above the 1 in 100 year flood line instead of conventional foundation design.
- One (1) Conservancy Tank
 - A conservancy tank rather than a septic tank will be developed, with the air vent outlet also extended be elevated above the 1 in 100 year flood line at 6m above MSL.

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

The aquatic specialist investigated the alternative of constructing the dwelling by **cutting into the slope to create a level area for foundations**. According to the specialist, the alternative will be susceptible to flood damage and present an obstruction to flood levels which could result in localised diversion /

impedance of flood flows which could cause scouring and erosion of the bank. Therefore, this alternative is **not a feasible / reasonable alternative**.

The preferred design alternative (on stilts / pillars) will allow flood waters to pass beneath the building and will minimise the risk of flood damage, scouring, erosion or impacting on estuarine processes.

Provide a motivation for the preferred design or layout alternative.

The preferred design is informed by WML Coastal Engineers who conducted a Flood Line Study to minimise the risk of flood damage, scouring and erosion, as well as specialist input from the aquatic specialist to ensure potential impacts can be minimised, mitigated and reduced whilst still achieving the Applicant's preferred outcome of being in close proximity to the river and their extended family.

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.

Preferred Design Alternative

Positive

- The preferred design alternative will allow flood waters to pass beneath the building and will minimise the risk of flood damage, scouring and erosion.
- The preferred design will not have a negative impact on the Estuarine Functional Zone of the Goukou Estuary processes.

Negative

- The dwelling is within 32m of a watercourse. However, elevated above the 1 in 100 year flood line and setback behind a construction aquatic buffer.
- Despite the design parameters the Applicant is still exposed to potential insurance constraints, as well as disclaimers by the Local Municipality to building plan approval.

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:

- Rainwater tanks
- LED lights only
- Dual flush toilets
- Low flow shower heads
- Low flow faucets

Provide a description of any other technology alternatives investigated.

Provide a motivation for the preferred technology alternative.

The use of solar/heat pumps/gas geysers reduces the demand on (municipal) electricity. The use of rainwater tanks provides households with water for gardening or other uses that reduces the demand on municipal water supply. The use of LED lights reduces the demand for municipal electricity. Use of low flow shower heads and dual flush toilets reduces the pressure on municipal potable water supply. The use of gas stoves in households reduces the demand on municipal electricity supply.

Provide a detailed motivation if no alternatives exist.

List the positive and negative impacts that the technology alternatives will have on the environment.	
<u>Positive</u>	
<ul style="list-style-type: none"> Reduce water demand on borehole supply with rainwater tanks, dual flush toilets and low flow shower heads. 	
1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred operational alternative.	
<p>Recycling is recommended during operational phase.</p> <p>Indigenous landscaping only (rehabilitation phase).</p> <p>Ongoing invasive alien vegetation control.</p>	
Provide a description of any other operational alternatives investigated.	
Provide a motivation for the preferred operational alternative.	
<p>Recycle at source to reduce pressure on landfill sites.</p> <p>Indigenous landscaping within open space creates micro habitats within the development which ultimately reduces the carbon footprint of the development, it helps maintain the microclimate of the development and it encourages the return of fauna such as birds and a variety of insects/pollinators.</p> <p>Long-term invasive alien control ensures that sensitive indigenous habitat does not get invaded and replaced by faster growing invasive plant species.</p>	
Provide a detailed motivation if no alternatives exist.	
List the positive and negative impacts that the operational alternatives will have on the environment.	
<u>Positive</u>	
<p>Recycling will reduce pressure on landfill sites.</p> <p>Indigenous landscaping will enhance the biodiversity of the site.</p>	
<u>Negative</u>	
N/A	
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.	
<p>The No-Go Alternative is the option to retain the status quo i.e. not implementing the dwelling. This implies that no development takes place at all on the property, which sterilises the property which has zoning / land use rights that allow for a residential dwelling as a minimum. The No-Go option would be contrary to implementation of the primary rights awarded to the zoning/property which would be an infringement of property owner rights.</p>	
1.7.	Provide an 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.
1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.
<p>Preferred Property: Portion 257 of Farm Melkhoute Fontein No. 480</p> <p>Preferred Site: Site Alternative A</p> <p>Preferred Activity: Primary residential dwelling</p> <p>Preferred Design: One (1) primary dwelling on stilts / pillars, one (1) conservancy tank, one (1) rainwater harvesting tank & grassed parking for vehicles.</p>	

Preferred Services: Existing borehole, Eskom Electrical Connection & Conservancy tank to be emptied by either the municipality or private service provider.

Preferred Technology: Heat pumps and/or gas geysers (or similar) for heating of water, rainwater tank, LED lights only, dual flush toilets, low flow shower heads, low flow faucets, gas stoves optional, re-use of filtered grey water for irrigation and landscaping.

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 identified no-go areas are all areas outside the permanent & temporary disturbance footprints of the preferred alternative for the purposes of CONSTRUCTION. The applicant retains his right to access the remainder of this property during operational phase on condition that such access requirements do not require additional authorisations ito applicable legislation as may be applicable ito the NFA and NEMA.

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 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.

- Alternative A follows the design recommendations of the flood line assessment described above and is constructed on top of supporting pillars according to the SDP (Sites A & B).
- Alternative B is constructed by cutting into the slope to create a level area for foundations.
- Sites C & D are not deemed feasible by the Applicant and was therefore not comparatively assessed by specialists.

Alternative:	Preferred Alternative (Alternative A for Sites A & B)	Non-Preferred Alternative (Alternative B)	Non-Preferred Alternative (No-Go Alternative)
PLANNING, DESIGN AND DEVELOPMENT PHASE & OPERATIONAL PHASE			
Potential impact and risk:	Transformation of habitat within the Estuarine Functional Zone of the Goukou River estuary.		
Nature of impact:	Negative	Negative	Negative
Extent and duration of impact:	Extend with and without mitigation: Very limited Duration with and without mitigation: Ongoing	Extend with and without mitigation: Very limited Duration with and without mitigation: Ongoing	Extent: Very limited Duration: Ongoing
Consequence of impact or risk:	Negative Impact on the EFZ	Negative Impact on the EFZ	Negative Impact on the EFZ
Probability of occurrence:	Without Mitigation: Unlikely With Mitigation: Highly Unlikely	Without Mitigation: Unlikely With Mitigation: Highly Unlikely	Highly Unlikely
Degree to which the impact may cause irreplaceable loss of resources:	With and without mitigation: Low	With and without mitigation: Low	Low
Degree to which the impact can be reversed:	With and without mitigation: High	With and without mitigation: High	High
Indirect impacts:			
Cumulative impact prior to mitigation:			
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Negligible (-24)	Negligible (-24)	Negligible (-8)
Degree to which the impact can be avoided:			
Degree to which the impact can be managed:			
Degree to which the impact can be mitigated:	From Negligible (-24) to Negligible (-8)	From Negligible (-24) to Negligible (-8)	

Proposed mitigation:	Working areas must be clearly demarcated. Estuarine habitat outside of the working area must be designated as No-Go and no disturbance (i.e. trampling, smothering etc.) of estuarine habitat in this area is permitted. A 10 m buffer (measured from the edge of the bankful channel) must be implemented and be clearly demarcated.		
	No excavated material must be dumped or stockpiled in the buffer area.		
	A comprehensive method statement must be drawn up which provides a clear step by step plan of the sequence of construction activities that will be undertaken. The method statement must aim to minimize the length of time that cleared areas remain exposed and vulnerable to erosion.		
Residual impacts:			
Cumulative impact post mitigation:			
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Negligible (-8)	Negligible (-8)	

Alternative:	Preferred Alternative (Alternative A for Sites A & B)	Non-Preferred Alternative (Alternative B)	Non-Preferred Alternative (No-Go Alternative)
PLANNING, DESIGN AND DEVELOPMENT PHASE & OPERATIONAL PHASE			
Potential impact and risk:	Erosion and sedimentation caused by clearance of vegetation during construction.		
Nature of impact:	Negative	Negative	No Impact
Extent and duration of impact:	Extend with and without mitigation: Very limited Duration with and without mitigation: Brief	Extend with and without mitigation: Very limited Duration with and without mitigation: Brief	
Consequence of impact or risk:	Negative Impact on the EFZ	Negative Impact on the EFZ	
Probability of occurrence:	Without Mitigation: Probably With Mitigation: Highly Unlikely	Without Mitigation: Likely With Mitigation: Probably	
Degree to which the impact may cause irreplaceable loss of resources:	With and without mitigation: Low	With and without mitigation: Low	
Degree to which the impact can be reversed:	With and without mitigation: High	With and without mitigation: High	
Indirect impacts:			

Cumulative impact prior to mitigation:			
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Negligible (-20)	Negligible (-35)	
Degree to which the impact can be avoided:			
Degree to which the impact can be managed:			
Degree to which the impact can be mitigated:	From Negligible (-20) to Negligible (-12)	From Negligible (-35) to Negligible (-24)	
Proposed mitigation:	<p>Working areas must be clearly demarcated to avoid unnecessary clearing of vegetation. Estuarine habitat outside of the working area must be designated as No-Go and no disturbance (i.e. trampling, smothering etc.) of estuarine habitat in this area is permitted.</p> <p>For Alternative A, vegetation clearance must be limited to the proposed location of supporting piles.</p> <p>A comprehensive method statement must be drawn up which provides a clear step by step plan of the sequence of construction activities that will be undertaken. The method statement must aim to minimise the length of time that cleared areas remain exposed and vulnerable to erosion.</p> <p>Silt fencing must be placed along the lower southern boundary of the development footprint to prevent sediment input in the event of a rainfall event.</p> <p>Any disturbed, exposed areas outside of the development footprint must be reprofiled to natural contours and re-vegetated.</p>		
Residual impacts:			
Cumulative impact post mitigation:			
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Negligible (-12)	Negligible (-24)	

Alternative:	Preferred Alternative (Alternative A for Sites A & B)	Non-Preferred Alternative (Alternative B)	Non-Preferred Alternative (No-Go Alternative)
PLANNING, DESIGN AND DEVELOPMENT PHASE & OPERATIONAL PHASE			
Potential impact and risk:	Disturbance of estuarine and coastal habitat caused by general construction activities.		
Nature of impact:	Negative	Negative	No Impact
Extent and duration of impact:	Extend with and without mitigation: Very limited	Extend with and without mitigation: Very limited	

	Duration with and without mitigation: Brief	Duration with and without mitigation: Brief	
Consequence of impact or risk:	Negative Impact on the EFZ	Negative Impact on the EFZ	
Probability of occurrence:	Without Mitigation: Likely With Mitigation: Highly Unlikely	Without Mitigation: Likely With Mitigation: Probably	
Degree to which the impact may cause irreplaceable loss of resources:	With and without mitigation: Low	With and without mitigation: Low	
Degree to which the impact can be reversed:	With and without mitigation: High	With and without mitigation: High	
Indirect impacts:			
Cumulative impact prior to mitigation:			
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Negligible (-30)	Negligible (-30)	
Degree to which the impact can be avoided:			
Degree to which the impact can be managed:			
Degree to which the impact can be mitigated:	From Negligible (-30) to Negligible (-12)	From Negligible (-30) to Negligible (-12)	
Proposed mitigation:	<p>Access to the construction area through the buffer area is not permitted. Access must be restricted to the strip of transformed EFZ immediately south of the main residential dwelling on Portion 132 of Farm 480.</p> <p>No construction materials may be stored or stockpiled outside of the area delineated by the rock revetment or in any part of the undeveloped areas of the EFZ.</p> <p>Rubble and waste materials must be managed on site and must not be dumped or stockpiled within the buffer area.</p> <p>Chemical toilets should be provided on-site at 1 toilet per 10 persons.</p> <p>Waste from chemical toilets must be disposed of regularly (at least once a week) in a responsible manner by a registered waste contractor.</p>		
Residual impacts:			
Cumulative impact post mitigation:			
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Negligible (-12)	Negligible (-12)	

Alternative:	Preferred Alternative (Alternative A for Sites A & B)	Non-Preferred Alternative (Alternative B)	Non-Preferred Alternative (No-Go Alternative)
PLANNING, DESIGN AND DEVELOPMENT PHASE & OPERATIONAL PHASE			
Potential impact and risk:	Impedance and diversion of flood flows.		
Nature of impact:	Negative	Negative	No Impact
Extent and duration of impact:	Extend with and without mitigation: Limited Duration with and without mitigation: Ongoing	Extend with and without mitigation: Limited Duration with and without mitigation: Ongoing	
Consequence of impact or risk:	Flood damage and obstruction to flood events	Flood damage and obstruction to flood events	
Probability of occurrence:	With & Without Mitigation: Unlikely	With & Without Mitigation: Likely	
Degree to which the impact may cause irreplaceable loss of resources:	With and without mitigation: Low	With and without mitigation: Low	
Degree to which the impact can be reversed:	With and without mitigation: High	With and without mitigation: High	
Indirect impacts:			
Cumulative impact prior to mitigation:			
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Negligible (-33)	Minor (-55)	
Degree to which the impact can be avoided:			
Degree to which the impact can be managed:			
Degree to which the impact can be mitigated:	From Negligible (-33) to Negligible (-33)	From Minor (-55) to Minor (-55)	
Proposed mitigation:	No additional mitigation is applicable. Alternative A represents a lower impact due to the design.		
Residual impacts:			
Cumulative impact post mitigation:			
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Negligible (-33)	Negligible (-55)	

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

1.	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.
----	---

Agricultural Findings

- The construction of a primary dwelling and associated infrastructure will lead to a **negligible** loss of future agricultural production potential.
- The agricultural specialist **disputes** the **high** agricultural activity and **confirms** that it is **low** because of its assessed lack of cropping potential which is limited by the location and very small size of the site (i.e., development footprint).
- The overall negative agricultural impact is assessed as being of **low** significance and acceptable.

Fauna Findings

- The entire development footprint is already transformed with very little to no natural habitat left on-site.
- No fauna SCC were found on-site during the site inspection and the presence is confirmed to be unlikely.
- The proposed activity is not expected to have an impact on species of conservation concern (SCC) beyond the boundary of the preferred site.

Botanical/Biodiversity Findings

- No plant SCC were found on site during the site inspection and the presence are confirmed to be unlikely due to the transformed nature of the proposed development site.
- The proposed development site is not representative of Gouritz Valley Thicket.
- The proposed activity will not impact on CBA1 or ESA2.
- The proposed development footprint avoids the densely vegetated area containing milkwood trees to the north and east.

Aquatic Findings

- Construction of the dwelling will occur within a transformed section of the Goukou EFZ which offers limited habitat options for estuarine biota.
- No part of the development will occur within the river and no aquatic estuarine biota are expected to be adversely impacted.
- It is unlikely that the development will significantly affect the ecological or functional attributes of the broader estuarine system.
- All potential negative impacts can be mitigated to Negligible.
- The preferred SDP is considered acceptable from an aquatic biodiversity perspective.

Mitigation measures identified by the specialists are listed below (#2).

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

Construction Phase

- Working areas must be clearly demarcated. Estuarine habitat outside of the working area must be designated as No-Go and no disturbance (i.e. trampling, smothering etc.) of estuarine habitat in this area is permitted. A 10 m buffer (measured from the edge of the bankful channel) must be implemented and be clearly demarcated (Figure 43).
 - The identified buffer areas are all areas outside the permanent & temporary disturbance footprints of the preferred alternative for the purposes of CONSTRUCTION, except for one (1) stilt / pillar (acceptable by the aquatic specialist). The applicant retains his right to access the remainder of this property during the operational phase

on condition that such access requirements do not require additional authorisations ito applicable legislation as may be applicable ito the NFA and NEMA.

- No excavated material must be dumped or stockpiled in the No-Go area.
- A comprehensive method statement must be drawn up which provides a clear step by step plan of the sequence of construction activities that will be undertaken. The method statement must aim to minimise the length of time that cleared areas remain exposed and vulnerable to erosion.

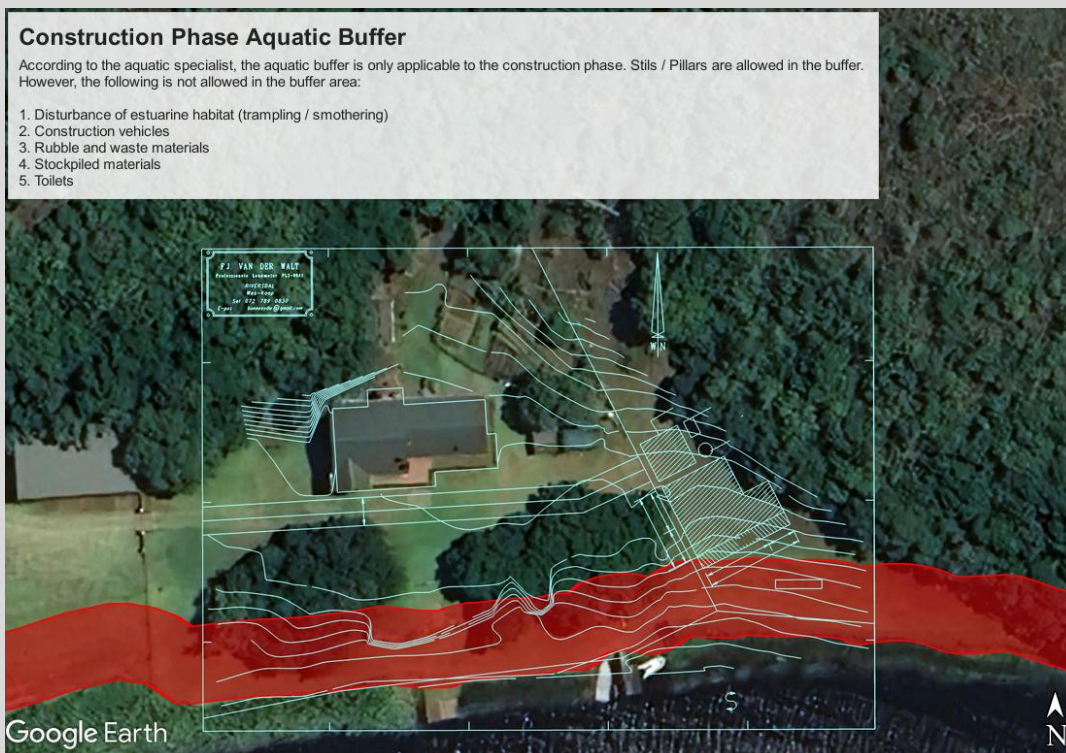


Figure 43: No-Go area delineated by the Aquatic Specialist for the construction phase.

- Vegetation clearance for the primary dwelling must be limited to the proposed location of supporting piles.
- Silt fencing must be placed along the lower southern boundary of the development footprint to prevent sediment input in the event of a rainfall event.
- Any disturbed, exposed areas outside of the development footprint must be reprofiled to natural contours and re-vegetated.
- Access to the construction area through the No-Go area is not permitted. Access must be restricted to the strip of transformed EFZ immediately south of the main residential dwelling on Portion 132 of Farm 480.
- Rubble and waste materials must be managed on site and must not be dumped or stockpiled within the No-Go area.
- Chemical toilets should be provided on-site at 1 toilet per 10 persons.
- Waste from chemical toilets must be disposed of regularly (at least once a week) in a responsible manner by a registered waste contractor.

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.

Civil Aviation Theme

The site does not exceed the minimum height threshold as stipulated in the CAA Obstacle Guideline and therefore it is not necessary to conduct any studies in this regard. **SACAA has been approached for comment as part of the public participation process.**

Defence Theme

This theme is not relevant nor applicable to township expansion of a town. **No study is required.**

Aquatic Mitigation Measure

- Construction of the dwelling must be planned for the dry season (May to July).
 - Replaced with: Construction activities must be timed to coincide with a dry period. It is advised that the holder of the EA / Contractor contact the ECO to determine whether it is the right time to start with construction (based on the most recent weather reports).

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

Impacts are 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 DBAR (refer to the EMPr for more details):

- Construction activity times must adhere to applicable Municipal By-Laws;
- 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. 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.

- Water will become a very scarce resource as periods of drought will be longer. The use of mandatory rainwater tanks for each house is important.
- Rainfall intervals will become less, but downpours may be more severe. Stormwater management on the site is important to prevent unnecessary erosion and/or flooding.
- Re-use of filtered grey water for landscaping/irrigation and re-use in toilets/washing contributes to resource management to conserve potable water resources.
- The use of locally indigenous and endemic vegetation for landscaping and gardening will reduce the need for increased irrigation in future when dryer climate spells affect the area.
- The use of rainwater tanks will assist with reducing flooding as it will help to retain water.

6. Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.

There are no conflicting recommendations between specialists.

7. 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.

All findings and recommendations by the specialists have been incorporated into the preferred alternative.

8. Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.

1. AVOID IMPACTS

Avoid protected tree species and thicket areas deemed sensitive during construction (avoidance mitigation has been applied to preferred design alternative).

Landscape with indigenous plants and incorporate endemic plants from the area into the landscaping to recreate natural areas within the open space areas of the development.

2. MINIMISE IMPACTS

Limit construction activities to specified days and times.

Clear the site in a phased manner to minimise dust pollution i.e. clear house footprints instead of entire erven and only when a house will be constructed.

Only indigenous vegetation permitted in lieu of the loss of remaining on-site natural habitat/vegetation.

Appointing an ECO to oversee construction to further minimise the potential for unnecessarily direct or indirect impacts.

Implement resource conservation measures as part of the design, construction and operational phase.

Ensure that all external lighting is low level lighting to reduce the visual and night time impact on fauna and insects.

Implement the Environmental Management Plan under ECO supervision.

3. RECTIFY, REDUCE & 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">• The site is below the threshold for needing to be conserved as agricultural production land.• The development of the site for non-agricultural purposes will cause zero loss of future agricultural production potential in terms of national food security.• The overall negative agricultural impact of the proposed development is assessed as being of very low significance.• The proposed development has a Low Fauna Sensitivity due to:<ul style="list-style-type: none">○ The disturbed nature of the vegetation within the development footprint.○ The absence of Fauna Species of Conservation Concern (SCC) recorded.○ The lack of suitable habitat for Fauna SCC within the development footprint.○ The low likelihood that SCC are likely to occur within the development footprint.• No plant SCC were found on site during the site inspection and the presence are confirmed to be unlikely due to the transformed nature of the proposed development site.• The proposed activity will not impact on CBA1 or ESA2.• The proposed development footprint avoids the densely vegetated area containing milkwood trees to the north and east.• Construction of the dwelling will occur within a transformed section of the Goukou EFZ which offers limited habitat options for estuarine biota.• No part of the development will occur within the river and no aquatic estuarine biota are expected to be adversely impacted.• It is unlikely that the development will significantly affect the ecological or functional attributes of the broader estuarine system.• All potential negative impacts can be mitigated to Negligible.• The preferred SDP is considered acceptable from an aquatic biodiversity perspective.
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)
	Kindly refer to appendix B2.

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.
<ul style="list-style-type: none"> • Positive <ul style="list-style-type: none"> ○ Supporting the local economy during the construction phase, albeit on a small scale. ○ Active alien invasive vegetation clearing. ○ Within the primary rights of the property. ○ No negative impact on Terrestrial CBA & CBA1 (Estuaries) ○ No negative impact on Plant and Fauna SCC. ○ The preferred design alternative will allow flood waters to pass beneath the building and will minimise the risk of flood damage, scouring and erosion. ○ The preferred design will not have a negative impact on the Estuarine Functional Zone of the Goukou Estuary. • Negative <ul style="list-style-type: none"> ○ The primary dwelling is situated adjacent to a No-Go area which can be negatively impacted during construction (i.e., erosion and sediment input into the estuary) should the Applicant not implement mitigation measures. <ul style="list-style-type: none"> ▪ All mitigations measures recommended by the aquatic specialist to mitigate this negative impact have been included in the Environmental Management Programme. ○ The dwelling is located in the 1:100 year flood line and there is a risk of flooding and scouring of the banks during the operational phase. <ul style="list-style-type: none"> ▪ WML Coast provided measures to mitigate this potential negative impact. ○ Although the primary dwelling is located adjacent to Milkwood Thicket, some of the Milkwood Trees may need to be trimmed. <ul style="list-style-type: none"> ▪ The Applicant must apply for a forestry permit. 	

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"> • Appoint an Environmental Control Officer (ECO) to oversee the construction phase for the primary dwelling. • Implement and adhere to an approved Environmental Management Plan. • Apply for Forestry Permits if any trimming/roots of protected trees may be required during construction. • All landscaping must be indigenous vegetation. • Restrict working times and hours to minimise noise/dust pollution. • Resource conservation measures must be implemented. 	
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 2.1, 2.3, as well as sections 3,4 & 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.

The following conditions must be considered:

- Development may not proceed until such time as all approvals are obtained.
- Local employment must be a priority to ensure maximum social benefit to the wider community.
- An ECO must be appointed prior to construction to oversee site preparation, vegetation removal and construction.
- DAFF permits must be obtained prior to removal/trimming/cutting of any protected trees on the property.
- EMP must be implemented.
- Resource conservation measures must be implemented.

2.4. Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.

The EAP assumes that the necessary approvals such as planning approvals / forestry permits / building plan approvals and contracts, will be finalised within the initial **five (5) year commencement** period.

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) years for completion of the activity from date of implementation.

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.

- Potable water may not be used during construction.
- Rainwater harvesting must be implemented (i.e., water tanks).
- Borehole water supply to reduce demand on municipal water.

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.
- The Managing Agent must ensure that private collection or own transport of recyclable materials from the site during /construction 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.
- Use of gas stoves is optional.
- Use of solar panels on roofs (optional).
- Low level lighting must be used for external lighting and lighting must be limited considering the natural environment the development is proposed in.

SECTION K: DECLARATIONS

DECLARATION OF THE APPLICANT

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

I..... **PHILIPPUS VILJOEN ELLIS**....., ID number ...**6008025058006**...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:

18 June 2025

Date:

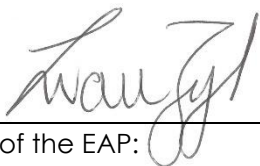
Ellis Farming Enterprises (CC)

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

ILouise-Mari van Zyl....., EAP Registration number2019/1444..... as the appointed EAP hereby declare/affirm the correctness of the:

- 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;



22 June 2025

Signature of the EAP:

Date:

Cape Environmental Assessment Practitioners

Name of company (if applicable):

DECLARATION OF THE CANDIDATE ENVIRONMENTAL ASSESSMENT PRACTITIONER (“EAP”)

I**Mariska Byleveld**....., EAP Registration number**2023/6593**..... as the appointed EAP hereby declare/affirm the correctness of the:

- 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;

M Byleveld

Signature of the EAP:

22 June 2025

Date:

Cape Environmental Assessment Practitioners

Name of company (if applicable):

DECLARATION OF THE REVIEW EAP

I _____, EAP 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.

Signature of the EAP: _____ Date: _____

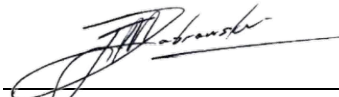
Name of company (if applicable): _____

DECLARATION OF THE SPECIALIST

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

I James Dabrowski, as the appointed 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 June 2025

Date:

Confluent Environmental

Name of company (if applicable):

DECLARATION OF THE SPECIALIST

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

I Johann Lanz, as the appointed 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 June 2025

Date:

SoilZa

Name of company (if applicable):

DECLARATION OF THE SPECIALIST

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

I Kim Daniels, as the appointed 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 June 2025

Signature:

Date:

Confluent Environmental

Name of company (if applicable):

DECLARATION OF THE REVIEW SPECIALIST

....., as the appointed Review Specialist hereby declare/affirm that:

- I have reviewed all the work produced by the Specialist(s);
- I have reviewed the correctness of the specialist information provided as part of this Report;
- I meet all of the general requirements of specialists as set out in Regulation 13 of the NEMA EIA Regulations;
- I have disclosed to the applicant, the EAP, the review EAP (if applicable), the Specialist(s), 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.

Signature of the EAP: _____ Date: _____

Name of company (if applicable): _____