



# DRAFT BASIC ASSESSMENT REPORT

for

## RESIDENTIAL DEVELOPMENT

on

Remainder of Erf 2841 and Associated Infrastructure on Erf 5574, Tergniet, Mossel Bay Municipality

In terms of the

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



**Prepared for Applicant:**  
**Seebou Wonings (Pty) Ltd**

**Date:** 6 September 2024

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

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

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**Assisting Candidate EAP E-mail:** francois@cape-eaprac.co.za

**Report Reference:** MOS766/06

**Department Reference:** 16/3/3/1/D6/35/0029/24

**Case Officer:** Steve Kleinhans

# Cape EAPrac

Cape Environmental Assessment Practitioners

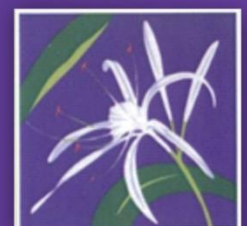
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**APPOINTED ENVIRONMENTAL ASSESSMENT PRACTITIONER:**

**Cape EAPrac Environmental Assessment Practitioners**

**PO Box 2070**

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**Tel: 044-874 0365**

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

**Assisted By - Candidate EAP: Mr Francois Byleveld** (MSc Geology [University of the Free State] (Candidate EAPASA Registration Number: **2023/6770**) in assistance to the Appointed EAP.

**PURPOSE OF THIS REPORT:**

Draft Basic Assessment Report

**APPLICANT:**

Seebou Wonings (Pty) Ltd

**CAPE EAPRAC REFERENCE NO:**

MOS766/06

**SUBMISSION DATE**

06 September 2024

# DRAFT BASIC ASSESSMENT REPORT

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

## Residential Development on

**Remainder of Erf 2841 and Associated Infrastructure on Erf 5574, Tergniet, Mossel Bay  
Municipality**

Submitted for:  
Stakeholder Review & Comment

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**Report Issued by:**  
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**Western Cape  
Government**

Department of Environmental Affairs and  
Development Planning

# **DRAFT 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**

Department of Environmental Affairs and  
Development Planning

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## DRAFT BASIC ASSESSMENT REPORT

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

**APRIL 2024**

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(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)

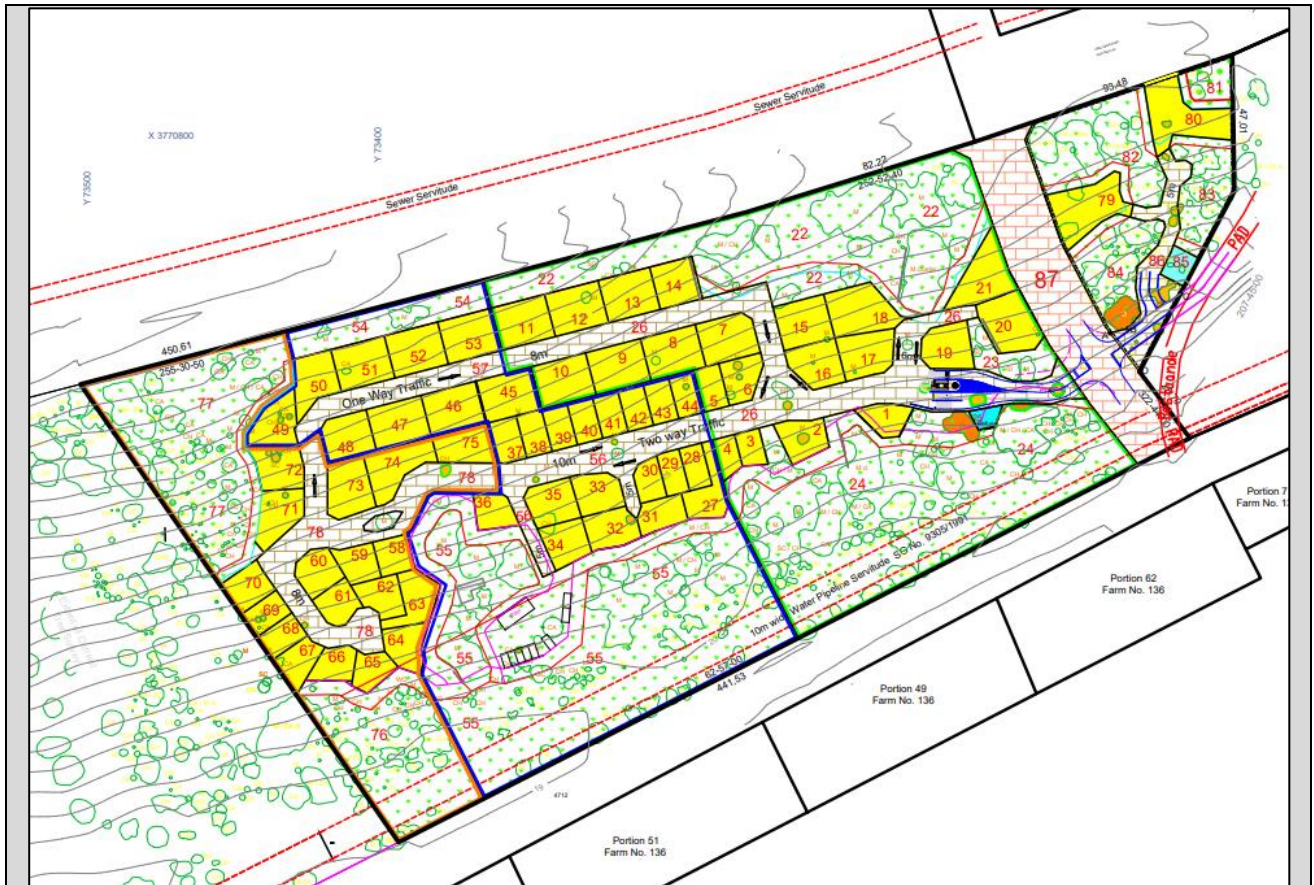
Seebou Wonings (Pty) Ltd, hereafter referred to as the Applicant, proposes to develop a residential development consisting of 68 erven (General Residential I), with an average size of approximately 220m<sup>2</sup> / erf, on Remainder of Erf 2841 (~5.25ha), with associated link sewerage infrastructure on Erf 5574, Tergniet (Figure 1).



**Figure 1: Locality map of Remainder of Erf 2841, Tergniet (FormaPlan, 2024).**

Remainder of Erf 2841 is currently zoned Agriculture Zone I, and should Environmental Authorisation be obtained, it is proposed to subdivide and rezone the property to the following:

- 68 x General Residential Zone I (~1.4937ha).
- 2 x Utility Zone (~0.0167ha).
- 11 x Open Space Zone II (~2.8163ha).
- 5 x Transport Zone III (~0.6712ha).
- 1 x Transport Zone I (~0.2525ha).



**Figure 2: Site development plan of proposed development on Remainder of Erf 2841 (Formaplan, 2024).**

### **Services:**

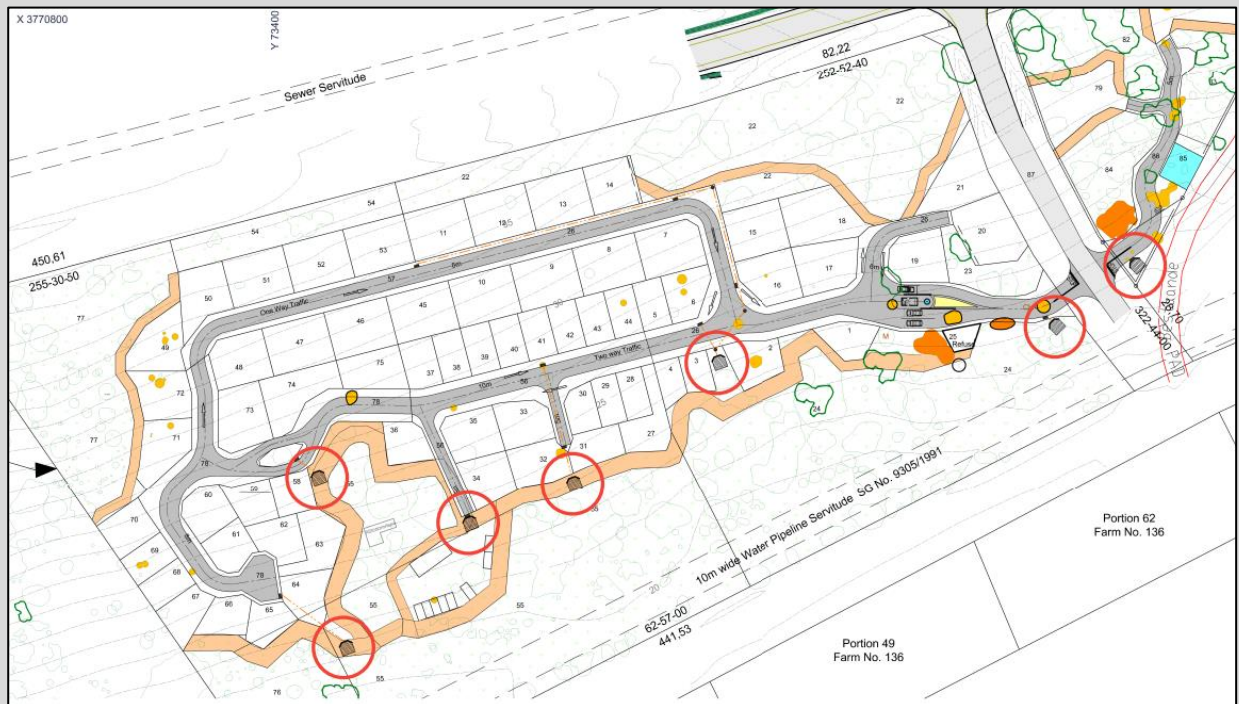
**Water:** The proposed development is proposed to be supplied by the Mossel Bay Municipality water supply network (specifically the Great Brak River area). It is proposed to connect via a 160mm $\varnothing$  water pipeline to the newly installed 200mm $\varnothing$  water pipeline in the R102 road reserve (Figure 4). The internal water network will consist of 75mm – 110mm diameter uPVC pipelines with 25mm $\varnothing$  metered erf connections.

**Sewerage:** Remainder of Erf 2841 does not contain any existing sewage infrastructure. The internal sewerage network will consist of 160mm $\varnothing$  pipes with 110mm $\varnothing$  diameter erf connections. The internal sewerage network will drain towards a new sewerage pump station (within an existing services servitude adjacent to the railway servitude) proposed on the southern boundary of Erf 5574 from which sewage will be pumped towards the regional pump station on Erf 2839 via a new gravity/pump line (Figure 4).

**Access:** Access to the proposed development will be directly off Souwesia Avenue. Souwesia Avenue connects to the R102 which is a Provincial Road linking Tergniet with Great Brak. Internal access roads will be 3 – 6.2m wide paved roads with edging on one side and a mountable curb on the other side. The proposed entrance gatehouse will allow for a 36m stacking distance from the position of the access boom to the Souwesia Avenue road reserve.

**Stormwater:** Remainder of Erf 2841 has a natural slope in a southern direction. Stormwater structures will be designed to act as energy dissipater and soak away systems simultaneously into the green belt area (Figure 3). Detailed designed of proposed stormwater outlet structures can be viewed in the Civil Engineering Services Report attached as Appendix G6 to this Draft Basic Assessment Report.

Noted that the infrastructure (sewer and stormwater) will be installed in the setback from the remaining thicket as per the Department of Forestry's requirement.



**Figure 3: Proposed stormwater outlet locations (Cobus Louw Engineering, 2024).**

**Solid Waste:** All solid waste will be disposed at the local Municipal dump site. The removal of solid waste and management thereof will be done by Mossel Bay Municipality as per a Service Agreement between the Mossel Bay Municipality and the Developer.

**Electricity:** The Mossel Bay Municipality will provide a 400kVA mini substation to be funded by the developer of RE/2841. The total estimated maximum demand for the entire development will amount to 216kVA (ADMD). The new mini substation will be placed within the proposed development and will be ring fed from an existing 4-way RMU located on the corner of R102 and Fynbos Avenue (Erf 2839) (Figure 5).



Figure 4: Existing services in proximity to Remainder of Erf 2841 (Extract From Engineering Services Report, 2024).

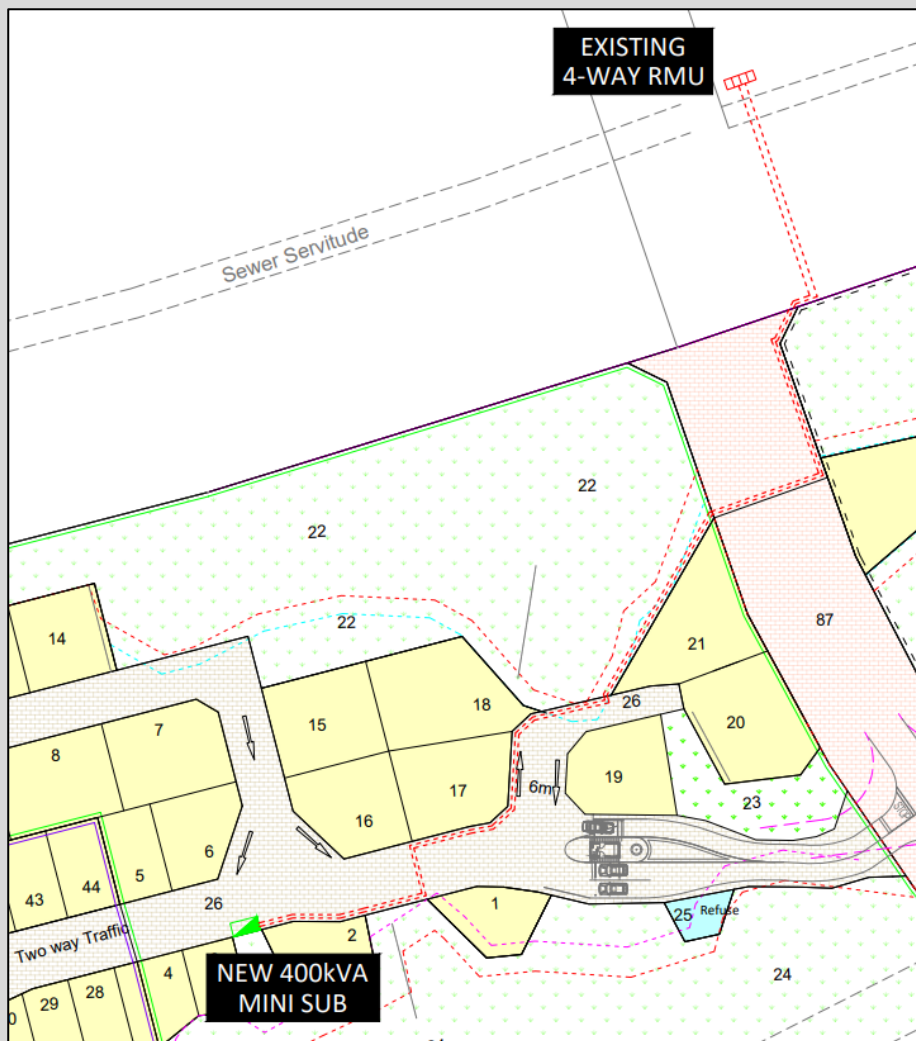


Figure 5: Connection of new mini substation to existing 4-way RMU (CVW Mechanical and Electrical Engineers, 2024).

## 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](mailto: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](mailto: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.

<b>DEPARTMENTAL DETAILS</b>	
<b>CAPE TOWN OFFICE:</b> <b>DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1)</b> (City of Cape Town, West Coast District, Cape Winelands District & Overberg District)	<b>GEORGE REGIONAL OFFICE:</b> <b>DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 3)</b> (Central Karoo District & Garden Route District)
The completed Form must be sent via electronic mail to: <a href="mailto:DEADPEIAAdmin@westerncape.gov.za">DEADPEIAAdmin@westerncape.gov.za</a>	The completed Form must be sent via electronic mail to: <a href="mailto:DEADPEIAAdmin.George@westerncape.gov.za">DEADPEIAAdmin.George@westerncape.gov.za</a>
Queries should be directed to the Directorate: Development Management (Region 1) at: E-mail: <a href="mailto:DEADPEIAAdmin@westerncape.gov.za">DEADPEIAAdmin@westerncape.gov.za</a> Tel: (021) 483-5829	Queries should be directed to the Directorate: Development Management (Region 3) at: E-mail: <a href="mailto:DEADPEIAAdmin.George@westerncape.gov.za">DEADPEIAAdmin.George@westerncape.gov.za</a> Tel: (044) 814-2006
Western Cape Government	Western Cape Government

Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1) Private Bag X 9086 Cape Town, 8000	Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530
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## MAPS

<b>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.</b>	
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"> <li>• an accurate indication of the project site position as well as the positions of the alternative sites, if any;</li> <li>• road names or numbers of all the major roads as well as the roads that provide access to the site(s)</li> <li>• a north arrow;</li> <li>• a legend; and</li> <li>• a linear scale.</li> </ul> <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>
<b>Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.</b>	
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"> <li>• 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.</li> <li>• The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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 <b>must</b> be clearly indicated on the site plan.</li> <li>• Servitudes and an indication of the purpose of each servitude must be indicated on the site plan.</li> <li>• 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"> <li>○ Watercourses / Rivers / Wetlands</li> <li>○ Flood lines (i.e., 1:100 year, 1:50 year and 1:10 year where applicable);</li> <li>○ Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&amp;DP");</li> <li>○ Ridges;</li> <li>○ Cultural and historical features/landscapes;</li> <li>○ Areas with indigenous vegetation (even if degraded or infested with alien species).</li> </ul> </li> <li>• Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted.</li> <li>• North arrow</li> </ul> <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	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 <b>Appendix C</b> . 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.
Biodiversity Overlay Map:	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 <b>Appendix D</b> .
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 <b>Appendix A3</b> .

## 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:	<b>Maps</b>		
	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	x
	Appendix A3:	<del>Map with the GPS co-ordinates for linear activities</del>	x
Appendix B:	Appendix B1:	Site development plan(s)	✓
	Appendix B2	<del>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;</del>	x

<b>Appendix C:</b>	<b>Photographs</b>	✓	
<b>Appendix D:</b>	<b>Biodiversity overlay map</b>	✓	
<b>Appendix E:</b>	<b>Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.</b>		
	<b>Appendix E1:</b>	<b>Final comment/ROD from HWC</b>	✓
	<b>Appendix E2:</b>	<b><del>Copy of comment from Cape Nature</del></b>	x
	<b>Appendix E3:</b>	<b><del>Final Comment from the DWS</del></b>	x
	<b>Appendix E4:</b>	<b><del>Comment from the DEA: Oceans and Coast</del></b>	x
	<b>Appendix E5:</b>	<b><del>Comment from the DAFF</del></b>	x
	<b>Appendix E6:</b>	<b>Comment from WCG: Transport and Public Works</b>	✓
	<b>Appendix E7:</b>	<b>Comment from WCG: DoA</b>	✓
	<b>Appendix E8:</b>	<b><del>Comment from WCG: DHS</del></b>	x
	<b>Appendix E9:</b>	<b><del>Comment from WCG: DoH</del></b>	x
	<b>Appendix E10:</b>	<b><del>Comment from DEA&amp;DP: Pollution Management</del></b>	x
	<b>Appendix E11:</b>	<b><del>Comment from DEA&amp;DP: Waste Management</del></b>	x
	<b>Appendix E12:</b>	<b>Comment from DEA&amp;DP: Biodiversity</b>	✓
	<b>Appendix E13:</b>	<b><del>Comment from DEA&amp;DP: Air Quality</del></b>	x
	<b>Appendix E14:</b>	<b><del>Comment from DEA&amp;DP: Coastal Management</del></b>	x
	<b>Appendix E15:</b>	<b><del>Comment from the local authority</del></b>	x
<b>Appendix E16:</b>	<b>Confirmation of all services (water, electricity, sewage, solid waste management)</b>	✓	

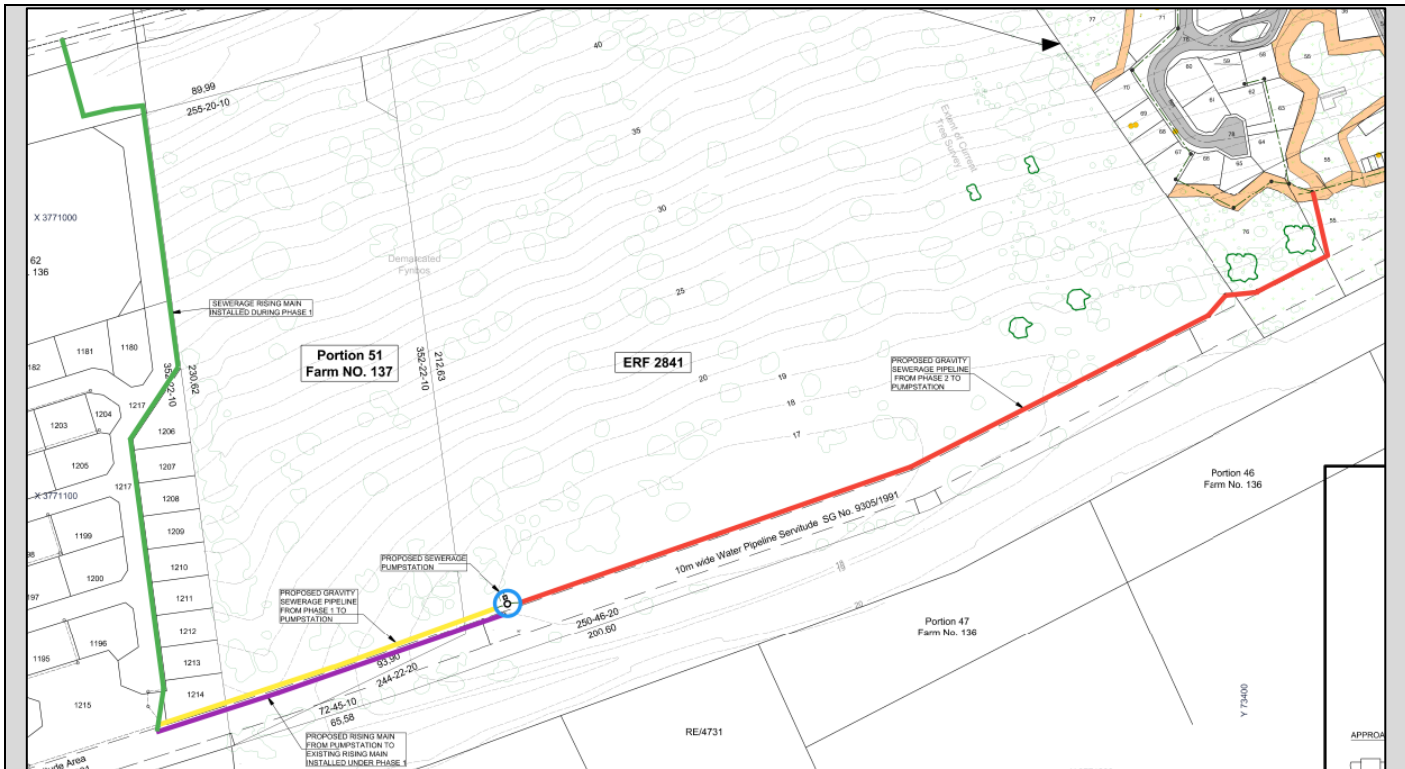
	<b>Appendix E17:</b>	<b>Comment from the District Municipality</b>	<b>x</b>
	<b>Appendix E18:</b>	<b>Copy of an exemption notice</b>	<b>x</b>
	<b>Appendix E19:</b>	<b>Pre-approval for the reclamation of land</b>	<b>x</b>
	<b>Appendix E20:</b>	<b>Proof of agreement/TOR of the specialist studies conducted.</b>	<b>x</b>
	<b>Appendix E21:</b>	<b>Proof of land use rights</b>	<b>✓</b>
	<b>Appendix E22:</b>	<b>Proof of public participation agreement for linear activities</b>	<b>x</b>
<b>Appendix F:</b>	<b>Public participation information: including a copy of the register of I&amp;APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.</b>		<b>✓</b>
<b>Appendix G:</b>	<b>Specialist Report(s)</b>		<b>✓</b>
<b>Appendix H:</b>	<b>EMPr</b>		<b>✓</b>
<b>Appendix I:</b>	<b>Screening tool report</b>		<b>✓</b>
<b>Appendix J:</b>	<b>The impact and risk assessment for each alternative</b>		<b>x</b>
<b>Appendix K:</b>	<b>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</b>		<b>x</b>
<b>Appendix L:</b>	<b>Subdivision of Agricultural Land Act, 1970 (Act 70 of 1970) Confirmation of the designation of Erf 2841</b>		<b>✓</b>
<b>Appendix M:</b>	<b>Specialist Studies (Previous Environmental Process of Andrew West Environmental Consultancy)</b>		<b>✓</b>

**SECTION A: ADMINISTRATIVE DETAILS**

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE: REGION 1		GEORGE OFFICE: REGION 3
	{City of Cape Town, West Coast District	{Cape Winelands District & Overberg District}	(Central Karoo District & Garden Route District)
<b>Duplicate this section where there is more than one Proponent</b>	Seebou Wonings (Pty) Ltd		
Name of Applicant/Proponent:	Seebou Wonings (Pty) Ltd		
Name of contact person for Applicant/Proponent (if other):	Zanthe Seegers		
Company/ Trading name/State Department/Organ of State:	Seebou Wonings (Pty) Ltd		
Company Registration Number:	2020/687728/07		
Postal address:	Leiden Avenue 4, Menkenkop, Hartenbos		
		Postal code: 6520	
Telephone:	( )	Cell: 084 200 1287	
E-mail:	zseegers48@gmail.com	Fax: ( )	
Company of EAP:	Cape Environmental Assessment Practitioners (Cape EAPrac)		
Appointed EAP name:	Ms Louise-Mari van Zyl		
Assisting Candidate EAP name:	Mr Francois Byleveld		
Postal address:	PO Box 2070, George		
		Postal code: 6530	
Telephone:	044 874 0365	Cell: 071 603 4132	
Appointed EAP E-mail:	louise@cape-eaprac.co.za	Fax: ( )	
Assisting Candidate EAP E-mail:	francois@cape-eaprac.co.za		
Appointed EAP Qualifications:	MA Geography & Environmental Science (US)		
Assisting Candidate EAP Qualifications:	MSc Geology (UFS)		
Appointed EAP registration no:	2019/1444		
Assisting Candidate EAP registration no:	2023/6770		
<b>Duplicate this section where there is more than one landowner</b>	Seebou Wonings (Pty) Ltd		
Name of landowner:	Seebou Wonings (Pty) Ltd		

Name of contact person for landowner (if other):	Zanthe Seegers	
	Postal address:	Leiden Avenue 4, Menkenkop, Hartenbos
		Postal code: 6520
	Telephone:	( ) Cell: 084 200 1287
	E-mail:	zseegers48@gmail.com Fax: (—)
Name of Person in control of the land: Name of contact person for person in control of the land: Postal address:	Same As Applicant	
		Postal code:
	Telephone:	( ) Cell:
	E-mail:	Fax: (—)
<b>Duplicate this section where there is more than one Municipal Jurisdiction</b> Municipality in whose area of jurisdiction the proposed activity will fall:	Mossel Bay Municipality	
	Contact person:	Carel Venter
	Postal address:	P.O. Box 25, Mossel Bay
		Postal code: 6500
	Telephone	044 606 5000 Cell:
E-mail:	cventer@mosselbay.gov.za	





**Figure 7: Sewage pipeline infrastructure and new proposed sewage pumpstation on Erf 5574.**

The following sewage infrastructure are proposed:

- Sewer gravity main (**red line; 160mmø; ~340m in length**) from proposed development on RE/2841 towards proposed new sewer pump station (Figure 7).
- New sewer pump station (**blue circle**) on southern boundary of Erf 5574 within existing services servitude (Figure 7).
- Sewer gravity main (**yellow line; 160mmø; ~140m in length**) from Seegenot Phase 1 towards new proposed sewage pump station (Figure 7).
- Sewer rising main (**purple line; 75mmø; ~140m in length**) towards an existing sewer rising main (green line; 75mmø) on Erf 1215 and Erf 1217 (already forming part of Seegenot Phase 1) (Figure 7). The existing sewer rising main (green line) connects to an existing 200mmø sewer pipeline within the R102 road reserve gravitating towards an existing Municipal sewer pump station on Erf 2839.

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

Access for the proposed routes will be obtained from existing services servitude located on the southern boundary of Remainder of Erf 2841 and Erf 5574 that runs along the railway servitude.

3.5.	SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives	C	0	5	1	0	0	0	3	0	0	0	0	2	8	4	1	0	0	0	0
		C	0	5	1	0	0	0	3	0	0	0	0	5	5	7	4	0	0	0	0
3.6.	<b>Starting point co-ordinates for all alternatives (Sewer gravity main (red line; 160mmø; ~340m in length) from proposed development on RE/2841 towards proposed new sewer pump station (Figure 7).)</b>																				
	Latitude (S)				34°				03'				49.57''								

Longitude (E)	22°	12'	18.98"
<b>Middle point co-ordinates for all alternatives (Sewer gravity main (red line; 160mmø; ~340m in length) from proposed development on RE/2841 towards proposed new sewer pump station (Figure 7).)</b>			
Latitude (S)	34°	03'	51.95"
Longitude (E)	22°	12'	12.72"
<b>End point co-ordinates for all alternatives (Sewer gravity main (red line; 160mmø; ~340m in length) from proposed development on RE/2841 towards proposed new sewer pump station (Figure 7).)</b>			
Latitude (S)	34°	03'	53.27"
Longitude (E)	22°	12'	07.38"
<b>Starting point co-ordinates for all alternatives (Sewer gravity main (yellow line; 160mmø; ~140m in length) from Seegenot Phase 1 towards new proposed sewage pump station (Figure 7).)</b>			
Latitude (S)	34°	03'	54.79"
Longitude (E)	22°	12'	02.38"
<b>Middle point co-ordinates for all alternatives (Sewer gravity main (yellow line; 160mmø; ~140m in length) from Seegenot Phase 1 towards new proposed sewage pump station (Figure 7).)</b>			
Latitude (S)	34°	03'	54.24"
Longitude (E)	22°	12'	04.90"
<b>End point co-ordinates for all alternatives (Sewer gravity main (yellow line; 160mmø; ~140m in length) from Seegenot Phase 1 towards new proposed sewage pump station (Figure 7).)</b>			
Latitude (S)	34°	03'	53.27"
Longitude (E)	22°	12'	07.38"
<b>Starting point co-ordinates for all alternatives (Sewer rising main (purple line; 75mmø; ~140m in length) towards an existing sewer rising main (green line; 75mmø) on Erf 1215 and Erf 1217 (forming part of Seegenot Phase 1) (Figure 7).)</b>			
Latitude (S)	34°	03'	53.27"
Longitude (E)	22°	12'	07.38"
<b>Middle point co-ordinates for all alternatives (Sewer rising main (purple line; 75mmø; ~140m in length) towards an existing sewer rising main (green line; 75mmø) on Erf 1215 and Erf 1217 (forming part of Seegenot Phase 1) (Figure 7).)</b>			
Latitude (S)	34°	03'	54.24"
Longitude (E)	22°	12'	04.90"
<b>End point co-ordinates for all alternatives (Sewer rising main (purple line; 75mmø; ~140m in length) towards an existing sewer rising main (green line; 75mmø) on Erf 1215 and Erf 1217 (forming part of Seegenot Phase 1) (Figure 7).)</b>			
Latitude (S)	34°	03'	54.79"
Longitude (E)	22°	12'	02.38"
<b>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.</b>			
4.	<b>Other developments</b>		
4.1.	Property size(s) of all proposed site(s):	5.25ha	
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:	~2.43ha	
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).		
<p>The applicant, proposes to develop a residential development consisting of 68 erven (General Residential I), with an average size of approximately 220m<sup>2</sup> / erf, on Remainder of Erf 2841 (~5.25ha) with associated sewerage infrastructure on Erf 5574, Tergniet (Figure 1).</p> <p>Remainder of Erf 2841 is currently zoned Agriculture Zone I, and should Environmental Authorisation be obtained, it is proposed to subdivide and rezone the property to the following:</p> <ul style="list-style-type: none"> <li>• 68 x General Residential Zone I (~1.4937ha).</li> <li>• 2 x Utility Zone (~0.0167ha).</li> <li>• 11 x Open Space Zone II (~2.8163ha).</li> <li>• 5 x Transport Zone III (~0.6712ha).</li> </ul>			

- 1 x Transport Zone I (~0.2525ha).

This development application follows on a previous application that halted at the pre-application phase, conducted by Andrew West Consulting) for a similar development area, but on a larger portion of land (subsequently subdivided). The development footprint has been informed by specialist input over a range of disciplines including botanical, biodiversity, fauna and aquatic. Notably these studies were undertaken with a high level of confidence as the Australian Myrtle that covered most of the site, was removed prior to the undertaken of the detailed specialist investigations. Following the clearing of Myrtle, the Applicant appointed a surveyor who, in a joint effort with Cape EAPrac, undertook a detailed protected tree survey.

#### **Services:**

**Water:** The proposed development is proposed to be supplied by the Mossel Bay Municipality water supply network (specifically the Great Brak River area). It is proposed to connect via a 160mmØ water pipeline to the newly installed 200mmØ water pipeline in the R102 road reserve (Figure 4). The internal water network will consist of 75mm – 110mm diameter uPVC pipelines with 25mmØ metered erf connections.

**Sewerage:** Remainder of Erf 2841 does not contain any existing sewage infrastructure. The internal sewerage network will consist of 160mmØ pipes with 110mmØ diameter erf connections. The internal sewerage network will drain towards a new sewerage pump station (within an existing services servitude adjacent to the railway line) proposed on the southern boundary of Erf 5574 from which sewage will be pumped towards the regional pump station on Erf 2839 via a new gravity/pump line (Figure 4).

**Access:** Access to the proposed development will be directly off Souwesia Avenue. Souwesia Avenue connects to the R102 which is a Provincial Road linking Tergniet with Great Brak. Internal access roads will be 3 – 6.2m wide paved roads with edging on one side and a mountable curb on the other side. The proposed entrance gatehouse will allow for a 36m stacking distance from the position of the access boom to the Souwesia Avenue road reserve.

**Stormwater:** Remainder of Erf 2841 has a natural slope in a southern direction. Stormwater structures will be designed to act as energy dissipater and soak away systems simultaneously into the green belt area (Figure 3).

**Solid Waste:** All solid waste will be disposed at the local Municipal dump site. The removal of solid waste and management thereof will be done by Mossel Bay Municipality as per a Service Agreement between the Mossel Bay Municipality and the Developer.

**Electricity:** The Mossel Bay Municipality will provide a 400kVA mini substation to be funded by the developer of RE/2841. The total estimated maximum demand for the entire development will amount to 216kVA (ADMD). The new mini substation will be placed within the proposed development and will be ring fed from an existing 4-way RMU located on the corner of R102 and Fynbos Avenue (Erf 2839) (Figure 5).

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

Access is to be obtained directly from Souwesia Avenue that bisects the Remainder of Erf 2841 (Figure 8). Souwesia Avenue connects directly to the R102 provincial road connecting Tergniet and Great Brak River. The existing access ("Bestaande Pad") in Figure 8 giving access to Erf 2840 is to be permanently closed. Erf 2840 will obtain access from an internal access road across the Remainder of Erf 2841.

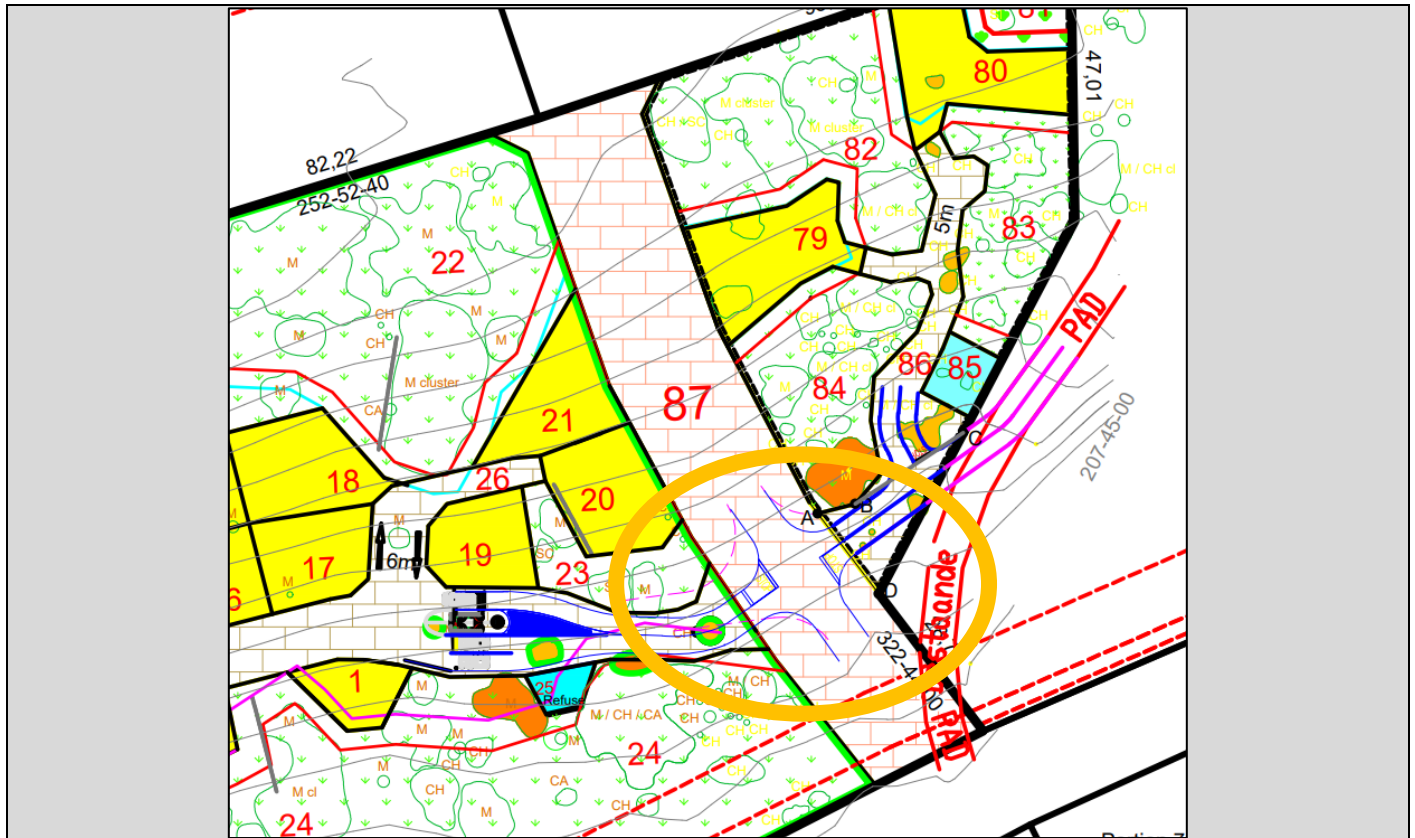


Figure 8: Proposed access from Souwesia Avenue that bisects the Remainder of Erf 2841 (FormaPlan, 2024).

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	5	1	0	0	0	3	0	0	0	0	2	8	4	1	0	0	0	0	0		
4.7.	Coordinates of the proposed site(s) for all alternatives:																							
	Latitude (S)		34°						03'						45.79"									
	Longitude (E)		22°						12'						21.11"									

## 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
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### 2. Is the following legislation applicable to the proposed activity or development.

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

### 3. Other legislation

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

Rezoning in terms of SPLUMA.

Remainder of Erf 2841 is currently zoned **Agriculture Zone I**, and should Environmental Authorisation be obtained, it is proposed to **subdivide and rezone** the property to the following:

- 68 x General Residential Zone I (~1.4937ha).
- 2 x Utility Zone (~0.0167ha).
- 11 x Open Space Zone II (~2.8163ha).
- 5 x Transport Zone III (~0.6712ha).
- 1 x Transport Zone I (~0.2525ha).

### 4. Policies

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

#### **Western Cape Provincial Spatial Development Framework (PSDF):**

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

The proposed development complements the PSDF goals in regard to the following aspects:

- Greater productivity, competitiveness and opportunities within the spatial economy.
- More inclusive development in the urban area.
- Strengthening resilience and sustainable development.

The proposed development is in line with the following policies laid down by the PSDF:

- **Policy S1:** Protect and enhance sense of place and settlement patterns.
  - **Point 1:** Prevent encroachment into agricultural areas, scenic areas.
    - The proposed development will not take place on land currently used for or earmarked for agricultural activities.
  - **Point 2:** Contain urban sprawl.
    - The Remainder of Ef 2841 is located within the Urban Edge of Mossel Bay and the proposed development will therefore not lead to urban sprawl.

#### **Mossel Bay Spatial Development Framework:**

- **Policy 1A:** Manage and preserve the mountains, natural vegetation, streams and rivers in a manner which protects the natural eco-systems.
  - The proposed development layout has been designed to be located on previously disturbed areas and minimizing the need for the removal of indigenous vegetation.
- **Policy 4B and 4C:** Prioritize efficient urban form and creation of an open space network.
  - The proposed development layout makes provision for approximately 2.8163ha of open space areas out of the total 5.2504ha available on the Remainder of Erf 2841.
- **Policy 4E:** Maintain a compact settlement form.
  - The Remainder of Erf 2841 is located within the Urban Edge of Mossel Bay. The proposed development is for a medium density group housing residential area with small erven (~220m<sup>2</sup> per erf) to maximize the use of the developable land available.
- **Policy 4I:** Supply in demand for full spectrum of property typologies and property prices.
  - The proposed development will make provision for different erf sizes and prices.

## 5. Guidelines

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

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

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

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

The guideline was followed to:

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

### 5.3. Guideline for Environmental Management Plans (June 2005)

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

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

Followed guidance on:

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

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

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

### 5.6. Guideline on Alternatives (March 2013)

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

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

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

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

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

## 6. Protocols

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

According to the DEA&DP series of guidelines for the involvement of specialists in the EIA process (2005), one of the underpinning generic principles is to **eliminate the unnecessary specialist involvement** through proactive project planning and design to avoid or sufficiently reduce negative impacts. Another is to **maximise the use of existing relevant information** prior to involving a specialist. This includes the input from the EAP and specialists, in the form of site photographs and site inspections. These principles apply to the

specialist studies that have been identified in the screening tool and motivated as not necessary in this report.

According to the Screening Tool the following themes have been identified as sensitive.

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

**Agriculture (High Sensitivity)** - The proposed development site has not been subject to any historical agricultural activities. The site consist of bush-clumps of thicket in a matrix of fynbos with protected tree species. Due to the small size of the subject property within the urban edge of Mossel Bay Municipality, and the lack of water rights registered for agricultural use, the Remainder of Erf 2841 is not deemed feasible for agricultural activities. It is noted that the DFFE Screening Tool map of the Agriculture Sensitivity Theme indicates that the majority of the subject property has a 'Medium' sensitivity with only small portions on the northern boundary indicated to have a 'High' sensitivity.

The sensitivity rating is **refuted** and the EAP is of the opinion that the Agriculture Theme sensitivity is **not relevant or applicable** to the proposed development. Since there is no provision in the Protocols for 'not applicable' the lowest possible rating of '**Low**' remains.

No agricultural studies will be undertaken for the proposed development.

The **Department of Environmental Affairs and Development Planning** confirmed that Erf 2841 was indeed included in the **Mossel Bay/Riversdal Regional Structure Plan, 1994** and that the property was **designated for Urban Development**. DEA&DP confirmed in their comment that the property is **exempt from the provisions of the Subdivision of Agricultural Land Act, 1970 (Act 70 of 1970)**. The meaning of this exemption is that the Department of Agriculture has effectively 'removed' the property from the so-called 'agricultural register' – implying that the property has no further 'agricultural' value/potential. The zoning alone (as Agriculture) does not justify further cost and investigations associated with 'agriculture potential' under these circumstances despite the *mapped* agricultural status according to the Screening Tool.

The **Western Cape Department of Agriculture: Land Use Management** confirmed **no objection** to the proposed subdivision and consolidation of Portion 51/137 and Erf 2841 in 2022 for the purposes of development.

The Western Cape Department of Agriculture will be approached again for comment as part of the Basic Assessment Process.

**Animal Species (High Sensitivity)** – The DFFE screening tool report identified four sensitive bird species as well as one invertebrate specie to possibly occur on the proposed development property:

- *Aves-Bradypterus sylvaticus*: Not observed on site and the preferred habitat for this species is fynbos and not thicket which is present on RE/2841.
- *Aves-Circus ranivorus*: Not observed on site. This specie is considered a waterbird. There are no watercourse features present on the proposed development site.

- *Aves-Neotis denhami*: Not observed on site. The preferred habitat for this specie is cultivated pastures and open grasslands or savannas which are not present on RE/2841.
- *Aves-Polemaetus bellicosus*: Not observed on site. This specie nests in tall trees and prefers open farmland with clumps of trees, savanna and semi-desert habitats which are not present on RE/2841.
- *Invertebrate-Aneuryphymus montanus*: Not observed on site. This specie prefers sclerophyllous fynbos habitat which is not present on RE/2841.

In addition to the five sensitive species identified in the Screening Tool Report, the faunal specialist also assessed likelihood of occurrence of an additional eight (8) faunal species. However, it was concluded that none of the assessed thirteen species were observed on site. All the assessed faunal sensitive species have a Low likelihood of occurrence with the exception of the Agulhas Long-billed Lark (*Certhilaude brevirostris*) that has a Low-Medium likelihood of occurrence.

The appointed faunal specialist therefore **refuted** the Terrestrial Animal Species of 'High' and recommends a new sensitivity rating of '**Low**'. A **Terrestrial Animal Species Compliance Statement** was therefore completed and forms part of this Basic Assessment Process (Appendix G2).

CapeNature will be approached for comment during the public participation process.

**Aquatic Biodiversity (Very High Sensitivity)** – The Screening Tool Report identified the proposed development site to have a 'Very High' sensitivity for the Aquatic Biodiversity Theme due to the presence of an Aquatic Ecological Support Area on the southern boundary of the property. Confluent Environmental was appointed to undertake an Aquatic Features Assessment in 2022 on the subject property in which it was concluded that based on the results of a desktop study and site inspection, it is not possible to confirm that a natural wetland is present as indicated in the NFEPA layer. The findings of the Aquatic Features Assessment is consistent with the revised National Wetland Map 5, which does not indicate a wetland on the proposed development site.

The sensitivity rating is **refuted** and the EAP, with input from the Aquatic Features Assessment completed in 2022, is of the opinion that the Aquatic Biodiversity Theme should have a sensitivity rating of '**Low**' for the proposed development. Confluent Environmental has undertaken an **Aquatic Biodiversity Compliance Statement** for the proposed development.

The Breede-Olifants Catchment Management Agency (BOCMA) will be approached for comment during the public participation process.

**Archaeological and Cultural Heritage (Low Sensitivity)** - The sensitivity rating is **confirmed**. Heritage Assessment undertaken as part of the previous application in 2008 and **HWC endorsed development** on the property at the time. New heritage/archaeological studies not required in terms of the endorsement for development of the site.

HWC will be consulted as part of this Basic Assessment application process.

**Civil Aviation (Medium Sensitivity)** – The Screening Tool Report identified the proposed development site to have a 'Medium' sensitivity for the Civil Aviation Theme due to the proximity of a civil aviation aerodrome within between 15km – 35km from the proposed development site.

The proposed residential development 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 proposed development site is located in close proximity to similar residential developments. The proposed development does not require prior approval from the SACAA.

The sensitivity rating of 'Medium' is therefore **refuted** and the EAP is of the opinion that this theme is **not relevant or applicable** to the proposed development. Since there is no provision in the Protocols for 'not applicable' the lowest possible rating of '**Low**' remains.

SACAA will be consulted with as part of the process.

**Defence (Low Sensitivity)** – The proposed development will pose no threat to military or defence forces of South Africa. The site is not situated near any military facilities. The sensitivity rating of 'Low' is **refuted** and the EAP is of the opinion that this theme is **not relevant or applicable** to the proposed development. Since there is no provision in the Protocols for 'not applicable' the lowest possible rating of '**Low**' remains. Further consultation with the Department of Defence is not deemed necessary.

**Palaeontology Impact Assessment (Medium Sensitivity):** The proposed development site is highly vegetated and overlain by deep sandy soils. It is unlikely that any palaeontological features could have been preserved on the proposed development site. It was also noted in the feedback from Heritage Western Cape on the NID that no trace of heritage related resources were identified on the proposed development site.

The sensitivity rating of 'Medium' is **refuted** and the EAP is of the opinion that this theme is **not relevant or applicable** to the proposed development. Heritage Assessment undertaken as part of a previous application in 2008 and HWC endorsed development on the property at the time. New heritage/archaeological studies not required in terms of the endorsement for development of the site.

HWC will be consulted as part of this Basic Assessment application process.

**Plant Species Theme (Medium Sensitivity)** – The probability of occurrence of all plant SCC and protected species flagged for the proposed development site, were assessed and it was confirmed that there are several species with a high likelihood of occurrence and therefore the Botanical Sensitivity Theme was confirmed to be **High**, however the specialist did not find any of the listed Species of Conservation Concern were identified on site.

A **Terrestrial Plant Species Impact Assessment** was completed and forms part of the Basic Assessment Process (Appendix G3).

CapeNature will be approached for comment during the public participation process.

**Terrestrial Biodiversity Theme (Very High Sensitivity)** – The Screening Tool Report identified the proposed development site to have a 'Very High' sensitivity for the Terrestrial Biodiversity Theme due to the presence of mapped Ecological Support Areas 2 (ESA 2), and **endangered** Hartenbos Dune Thicket vegetation.

The proposed development site was highly infested by alien vegetation species (Australian Myrtle) which have been purposefully cleared from the proposed development site to (a) ensure accessibility and increase confidence of findings, alongside the need to map protected trees that were amongst the Myrtle. Due to the lack of a burning regime, the majority of fynbos species became moribund and was displaced with pioneer thicket vegetation.

Due to the Biodiversity Priority Areas triggered in the Screening Tool Report, the Terrestrial Biodiversity Theme Sensitivity is **confirmed** to have a '**Very High**' sensitivity.

An integrated **Terrestrial Biodiversity/Botanical Impact Assessment** was therefore completed and forms part of this Basic Assessment Process.

CapeNature will be approached for comment during the public participation process.

Additional protocols identified in the Screening Tool Report:

**Landscape/Visual Impact Assessment:** A full **Visual Impact Assessment** was completed and forms part of this basic assessment process (Appendix G4).

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

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

- Consideration of the nature of the receiving environment, in particular whether vulnerable community, or areas with high poverty/unemployment, or areas where livelihoods depend on existing social relationships and income generating patterns, will be affected;
  - *The study area does not qualify in terms of these characteristics – the proposed development site area forms part of the urban landscape. The community of the surrounding area is not vulnerable and/or an area with high poverty/unemployment.*
- Areas where access to services, mobility/community networks are affected, or where livelihoods depend on access to and use of environmental resources and services;
  - *The property is not utilised for ecosystem services at a communal scale. The proposed development makes accommodation for ~2.82ha of open space areas where the natural areas will continue to function as normal.*
- Areas where the proposed land use will alter the sense of place or character of the area, or where the project represents a significant change in land use from the prevailing use;
  - *Development of residential units, adjacent to the R102 provincial road connecting Tergniet and Great Brak River, within an urban context, will not change the character of the area (although the vacant status of the property itself will change) and as such will not result in a significant change in the land use compared to the prevailing urban use.*
- Projects that require large workforce relative to the size of the existing workforce such as dams, railways, roads;
  - *The development will not require a larger workforce compared to similar developments in the surrounding area. The proposed development will provide employment opportunities for the local community during the construction and operational phases.*
- Areas of important tourism or recreational value should conflicting land uses be introduced;
  - *The coastal community/suburbs of Tergniet are characterised by a combination of primary dwellings, secondary (holiday) homes, as well as resort type developments mainly due to its proximity to the ocean/beach. Development of residential units is not considered a conflicting land use but rather compatible with the tourism/recreational/residential qualities of the area;*

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

## SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant <b>Basic Assessment Activity(ies)</b> as set out in <b>Listing Notice 1</b>	Describe the portion of the proposed development to which the applicable listed activity relates.
27	<p>The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for —</p> <p><del>(i) the undertaking of a linear activity; or</del></p> <p><del>(ii) maintenance purposes undertaken in accordance with a maintenance management plan.</del></p>	<p>The proposed development entails the clearance of an area of approximately 2.18ha that is mapped to contain Hartenbos Dune Thicket which is listed as Endangered.</p> <p>The botanical specialist confirmed the presence of indigenous vegetation on the Remainder of Erf 2841.</p>
Activity No(s):	Provide the relevant <b>Basic Assessment Activity(ies)</b> as set out in <b>Listing Notice 3</b>	Describe the portion of the proposed development to which the applicable listed activity relates.
4	<p>The development of a road wider than 4 metres with a reserve less than 13.5 metres.</p> <p><b>i. Western Cape</b></p> <p>i. <u>Areas zoned for use as public open space or equivalent zoning;</u></p> <p>ii. <u>Areas outside urban areas;</u></p> <p>(aa) Areas containing indigenous vegetation.</p> <p><del>(bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined or;</del></p> <p>iii. <u>Inside urban areas:</u></p> <p><del>(aa) Areas zoned for conservation use; or</del></p> <p><del>(bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority.</del></p>	<p>The internal access roads will be up to <b>5m wide</b> and have a road reserve less than 13.5m. Remainder of Erf 2841 is located within the Urban Edge of Mossel Bay Municipality however the property is considered to be located outside the urban area.</p>
12	<p>The clearance of 300 square metres or more of <b>indigenous vegetation</b> except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.</p> <p><b>(i) Western Cape</b></p>	<p>The proposed development entails the clearance of an area of approximately 2.18ha that is mapped to contain Hartenbos Dune Thicket which is listed as Endangered.</p>

	<p>(i) Within any critically endangered or <b>endangered</b> ecosystem listed in terms of section 52 of the NEMBA 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><del>(ii) Within critical biodiversity areas identified in bioregional plans;</del></p> <p><del>(iii) Within the littoral active zone or 100 metres inland from the 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.</del></p> <p><del>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</del></p> <p><del>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.</del></p>	
<p><b>Note:</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>		

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

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

## SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.
<p><b>Preferred Alternative</b></p> <p>The Applicant, proposes to develop a residential development consisting of 68 erven (General Residential I), with an average size of approximately 220m<sup>2</sup> / erf, on Remainder of Erf 2841 (~5.25ha) with associated sewerage infrastructure on Erf 5574, Tergniet (Figure 1).</p> <p>Remainder of Erf 2841 is currently zoned Agriculture Zone I, and should Environmental Authorisation be obtained, it is proposed to subdivide and rezone the property to the following:</p> <ul style="list-style-type: none"> <li>• 68 x General Residential Zone I (~1.4937ha).</li> <li>• 2 x Utility Zone (~0.0167ha).</li> <li>• 11 x Open Space Zone II (~2.8163ha).</li> <li>• 5 x Transport Zone III (~0.6712ha).</li> </ul> <p>1 x Transport Zone I (~0.2525ha). <b>Services:</b></p> <p><b>Water:</b> The proposed development is proposed to be supplied by the Mossel Bay Municipality water supply network (specifically the Great Brak River area). It is proposed to connect via a 160mm<math>\varnothing</math> water pipeline to the newly installed 200mm<math>\varnothing</math> water pipeline in the R102 road reserve (Figure 4). The internal water network will consist of 75mm – 110mm diameter uPVC pipelines with 25mm<math>\varnothing</math> metered erf connections.</p> <p><b>Sewerage:</b> Remainder of Erf 2841 does not contain any existing sewage infrastructure. The internal sewerage network will consist of 160mm<math>\varnothing</math> pipes with 110mm<math>\varnothing</math> diameter erf connections. The internal sewerage network will drain towards a new sewerage pump station (within an existing services servitude adjacent to the railway line) proposed on the southern boundary of Erf 5574 from which sewage will be pumped towards the regional pump station on Erf 2839 via a new gravity/pump line (Figure 4).</p> <p><b>Access:</b> Access to the proposed development will be directly off Souwesia Avenue. Souwesia Avenue connects to the R102 which is a Provincial Road linking Tergniet with Great Brak. Internal access roads will be 3 – 6.2m wide paved roads with edging on one side and a mountable curb on the other side. The proposed entrance gatehouse will allow for a 36m stacking distance from the position of the access boom to the Souwesia Avenue road reserve.</p> <p><b>Stormwater:</b> Remainder of Erf 2841 has a natural slope in a southern direction. Stormwater structures will be designed to act as energy dissipater and soak away systems simultaneously into the green belt area (Figure 3).</p> <p><b>Solid Waste:</b> All solid waste will be disposed at the local Municipal dump site. The removal of solid waste and management thereof will be done by Mossel Bay Municipality as per a Service Agreement between the Mossel Bay Municipality and the Developer.</p> <p><b>Electricity:</b> The Mossel Bay Municipality will provide a 400kVA mini substation to be funded by the developer of RE/2841. The total estimated maximum demand for the entire development will amount to 216kVA (ADMD). The new mini substation will be placed within the proposed development and will be ring fed from an existing 4-way RMU located on the corner of R102 and Fynbos Avenue (Erf 2839) (Figure 5).</p>	
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 Remainder of Erf 2841 is currently zoned Agriculture Zone I, and should Environmental Authorisation be obtained, it is proposed to subdivide and rezone the property to the following:

- 68 x General Residential Zone I (~1.4937ha).
- 2 x Utility Zone (~0.0167ha).
- 11 x Open Space Zone II (~2.8163ha).
- 5 x Transport Zone III (~0.6712ha).
- 1 x Transport Zone I (~0.2525ha).

The Department of Environmental Affairs and Development Planning (Planning Directorate) confirmed that Erf 2841 was indeed included in the Mossel Bay/Riversdal Regional Structure Plan, 1994 and that the property was designated for Urban Development. It is therefore the view of the DEA&DP that the property is exempt from the provisions of the Subdivision of Agricultural Land Act, 1970 (Act 70 of 1970).

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.
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Not applicable.

4.	Explain how the proposed development will be in line with the following?
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4.1	The Provincial Spatial Development Framework.
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#### **Western Cape Provincial Spatial Development Framework (PSDF):**

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

The proposed development complements the PSDF goals in regard to the following aspects:

- Greater productivity, competitiveness and opportunities within the spatial economy.
- More inclusive development in the urban area.
- Strengthening resilience and sustainable development.

The proposed development is in line with the following policies laid down by the PSDF:

- **Policy S1:** Protect and enhance sense of place and settlement patterns.
  - **Point 1:** Prevent encroachment into agricultural areas, scenic areas.
    - The proposed development will not take place on land currently used for or earmarked for agricultural activities.
  - **Point 2:** Contain urban sprawl.
    - The Remainder of Erf 2841 is located within the Urban Edge of Mossel Bay and the proposed development will therefore not lead to urban sprawl.

4.2	The Integrated Development Plan of the local municipality.
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The MB IDP 2022 confirms that the Spatial Vision of the Municipality is to create a long-term, sustainable land-use pattern that:

- Conserves the Mossel Bay municipality's significant rural resources for the biodiversity conservation of its rivers, wetlands, estuaries and coastline, natural vegetation, scenic landscapes, and extensive and intensive agriculture resources.
  - The proposed development property does not contain any watercourse features, estuaries and/or in proximity to the coastline. The Remainder of Erf 2841 was included in the Mossel Bay/Riversdal Regional Structure Plan, 1994 and that the property was designated for Urban Development. The proposed development will make provision of ~2.82ha of open space area to remain natural.

- To support rural tourism and agricultural economic growth and employment creation. The Municipality places a greater focus on leveraging its history, heritage and sense of place of the natural scenic areas and old town to revive its underperforming tourism economy;
  - The proposed development property is located within the Urban Edge of Mossel Bay Municipality and is earmarked for urban development. The development of a residential estate will support the holistic financial sustainability of Mossel Bay Municipality.
- Promotes inclusionary, efficient, urban growth that provides comfortable and convenient access to urban opportunities and livelihoods for all its existing and future residents; while at the same time; Decoupling this growth from excessive water, energy and land consumption along the coastal settlement strip.
  - The proposed development property is located within the Urban Edge of Mossel Bay Municipality and is earmarked for urban development which will prevent urban sprawl. Mossel Bay Municipality has confirmed sufficient services capacity in its system to accommodate the proposed development.

4.3. The Spatial Development Framework of the local municipality.

**Mossel Bay Spatial Development Framework:**

- **Policy 1A:** Manage and preserve the mountains, natural vegetation, streams and rivers in a manner which protects the natural eco-systems.
  - The proposed development layout has been designed to be located on previously disturbed areas and minimizing the need for the removal of indigenous vegetation.
- **Policy 4B and 4C:** Prioritize efficient urban form and creation of an open space network.
  - The proposed development layout makes provision for approximately 2.8163ha of open space areas out of the total 5.2504ha available on the Remainder of Erf 2841.
- **Policy 4E:** Maintain a compact settlement form.
  - The Remainder of Erf 2841 is located within the Urban Edge of Mossel Bay. The proposed development is for a medium density group housing residential area with small erven (~220m<sup>2</sup> per erf) to maximize the use of the developable land available.
- **Policy 4I:** Supply in demand for full spectrum of property typologies and property prices.
  - The proposed development will make provision for different erf sizes and prices.

4.4. The Environmental Management Framework applicable to the area.

Not applicable.

5. Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.

**Terrestrial Biodiversity and Botanical:**

**Figure 9: Map indicating the vegetation present on RE/2841 as well as Erf 5574 (Confluent Environmental, 2024).**

Following site inspection by the botanical specialist it is noted that the “Transformed Recently Cleared Invaded Area” represents the area that was cleared of Australian myrtle in the past. The area is recovering with pioneer plant species, most notable Bietou (*Osteospermum moniliferu*) with thicket clumps persisting and recovering around the transformed area.

- The proposed development is specifically designed to be located on the “Transformed Recently Cleared Invaded Area”, with limited encroachment into thicket vegetation.

The loss of habitat due to the proposed development will not reduce the ability to meet conservation targets of Hartenbos Dune Thicket considering that this site's habitat has long been transformed by invasive alien vegetation persisting on the property.

The probability of occurrence of all plant SCC and protected species flagged for the proposed development site were assessed and it was confirmed that there are several species with a high likelihood of occurrence and therefore the Botanical Sensitivity Theme was confirmed to be High, even though **none** of the listed Species of Conservation Concern were identified on site.

Protected tree species identified on site include *Pittosporum viridiflorum* (Cheesewood) as well as *Sideroxylon inerme* (White Milkwood).

- A full Protected Tree Species survey was completed and incorporated into the preferred Site Development Plan.

- Protected tree permits must be obtained prior to any removal/trimming of protected trees/clumps.
- The Department of Forestry (Ms Melanie Koen) has been involved with the pre-application process, through consultation about the site layout plan and site inspections with the EAP as well as the Applicant, to ensure that the remaining trees that may need to be trimmed/removed are limited and the majority of protected trees are avoided.

### **Terrestrial Animal Species:**

The DFFE screening tool report identified four sensitive bird species as well as one invertebrate species to possibly occur on the proposed development property:

- Aves-Bradypterus sylvaticus: Not observed on site and the preferred habitat for this species is fynbos and not thicket which is present on RE/2841.
- Aves-Circus ranivorus: Not observed on site. This species is considered a waterbird. There are no watercourse features present on the proposed development site.
- Aves-Neotis denhami: Not observed on site. The preferred habitat for this species is cultivated pastures and open grasslands or savannas.
- Aves-Polemaetus bellicosus: Not observed on site. This species nests in tall trees and prefers open farmland with clumps of trees, savanna and semi-desert habitats.
- Invertebrate-Aneuryphymus montanus: Not observed on site. This species prefers sclerophyllous fynbos habitat which is not present on RE/2841.

In addition to the five sensitive species identified in the Screening Tool Report, the faunal specialist also assessed likelihood of occurrence of an additional eight (8) faunal species. However, it was concluded that none of the assessed thirteen species were observed on site. All the assessed faunal species have a Low likelihood of occurrence with the exception of the Agulhas Long-billed Lark (*Certhilaude brevirostris*) that has a Low-Medium likelihood of occurrence. It is therefore recommended that should any Agulhas Long-billed Lark nests be found or suspected to occur on site, construction should be paused until such time that their presence can be confirmed by a faunal specialist.

- This recommendation is included in the Environmental Management Programme forming part of this Draft Basic Assessment Report.

6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development.
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The proposed development site does not contain any mapped Critical Biodiversity Areas (CBA) or Ecological Support Areas (ESA) (Figure 10). It is noted that the area contains a mapped Aquatic ESA associated with a wetland, however the findings of the Aquatic Features Assessment is consistent with the revised National Wetland Map 5, which does not indicate a wetland on the proposed development site.

The majority of the proposed development site is mapped as Other Natural Areas.

### **Other Natural Areas:**

Definition: These areas retain most of their natural character and perform biodiversity and ecological infrastructure functions but have not been prioritised in the current Western Cape Biodiversity Spatial Plan.

Objective: Minimise habitat and species loss to ensure ecosystem functionality through strategic landscape planning. Some flexibility in permissible land uses, but authorisation may still be required for high-impact uses.



**Figure 10: Biodiversity Spatial Plan Layers (CapeFarmMapper, 2024).**

It is noted from the Aquatic specialist investigation that the original Botanical Report compiled by Jan Vlok) that indicated the presence of a wetland, was incorrect. There are no indicators of an on-site wetland as confirmed by Confluent Consulting (Dr James Dabrowski).

7.	Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.
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 since the submission of the Application Form.
9.	Explain how the proposed development will optimise vacant land available within an urban area.
	The property is currently largely vacant and makes limited contribution to the local economy of the town other than rates & taxes for primary usage. The proposed development promotes smart growth by ensuring the efficient use of the land and infrastructure, by containing urban sprawl and prioritising infill, intensification and redevelopment within settlements.
10.	Explain how the proposed development will optimise the use of existing resources and infrastructure.
	<p><b>Water:</b> The proposed development is proposed to be supplied by the Mossel Bay Municipality water supply network (specifically the Great Brak River area). It is proposed to connect via a 160mmø water pipeline to the <b>existing</b> newly installed 200mmø water pipeline in the R102 road reserve (Figure 4).</p> <p><b>Sewerage:</b> Remainder of Erf 2841 does not contain any existing sewage infrastructure. The internal sewerage network will drain towards a new sewerage pump station (within an <b>existing</b> services servitude adjacent to the railway line) proposed on the southern boundary of Erf 5574 from which sewage will be pumped towards an <b>existing</b> sewer rising main on Erf 1215 and Erf 1217 (forming part of Seegenot Phase 1) (Figure 7). The existing sewer rising main (green line) connects to an <b>existing</b> 200mmø sewer pipeline within the R102 road reserve gravitating towards an <b>existing</b> sewer pump station on Erf 2839.</p>

**Access:** Access to the proposed development will be directly off Souwesia Avenue. Souwesia Avenue connects to the R102 which is an **existing** Provincial Road linking Tergniet with Great Brak.

**Solid Waste:** All solid waste will be disposed at the local Municipal dump site. The removal of solid waste and management thereof will be done by Mossel Bay Municipality as per a Service Agreement between the Mossel Bay Municipality and the Developer.

**Electricity:** The Mossel Bay Municipality will provide a 400kVA mini substation to be funded by the developer of RE/2841. The total estimated maximum demand for the entire development will amount to 216kVA (ADMD). The new mini substation will be placed within the proposed development and will be ring fed from an **existing** 4-way RMU located on the corner of R102 and Fynbos Avenue (Erf 2839) (Figure 5).

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).
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**Water:** It is proposed to connect via a 160mm $\varnothing$  water pipeline to the existing newly installed 200mm $\varnothing$  water pipeline in the R102 road reserve (Figure 4).

**Sewerage:** Mossel Bay Municipality has confirmed that the existing sewer pumpstation on the Southern boundary of Erf 2839 will be able to accommodate the sewerage generated at the proposed development. The developer of the Remainder of Erf 2841 will be responsible for the sewage to be pumped from the proposed development to the existing sewer pumpstation on Erf 2839. The construction of the new proposed pumpstation on the Southern boundary of Erf 5574 will be for the cost of the developer of the Remainder of Erf 2841.

**Electricity:** Mossel Bay Municipality has confirmed capacity for the proposed development and that supply will be made available from the existing 11kV network feeding from Tergniet Switching Substation.

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

Need:

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

- Create employment opportunities during the construction and operational phases;
- Contribute to the economic growth of Tergniet (providing a mixed density of residential housing);
- Increase the holistic financial sustainability of Mossel Bay Municipality.

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

Desirability:

The proposal is regarded as desirable because the proposed development:

- Is unlikely to impact negatively on existing land use rights of neighbouring property owners.
- It will not prevent any surrounding owner to exercise their legal land use rights.
- Will create employment opportunities during the construction and operational phase.
- It will optimise vacant land within the Urban Edge of Mossel Bay Municipality.
- It will prevent urban sprawl.

- Services are available to the development.

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

Questions to be engaged with when considering need & desirability:

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

The development will result in a loss of approximately 2.18ha of previously transformed vegetation. The proposed development site is not located in a high-risk area such as areas affected by flood lines and steep slopes. The preferred alternative has specifically been designed to accommodate sensitive habitats/vegetation identified by specialist studies.

Ecological fire no longer forms part of the processes necessary to maintain a natural fynbos habitat. The lack of fire and the establishment of alien invasive vegetation (with subsequent removal thereof) has decreased the quality of thicket vegetation present on the proposed development site.

The proposed development will avoid any pollution runoff into the proposed open space areas through implementation of mitigation measures recommended by specialist studies in consultation with the project engineer.

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

The proposed development will be limited to disturbed, transformed (recently cleared of alien vegetation).

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

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

- All No-Go areas/biodiversity sensitive areas will be avoided during construction.
- Construction vehicles will be limited to the predetermined access route of the proposed development site.
- The proposed development will prevent any pollution runoff into the adjacent open space areas from unlawfully dump/infill material.
- Stormwater attenuation will take place on-site to reduce the risk of influencing the surrounding open space areas
- All general construction waste/rubble which will be removed to the local municipal waste site for building rubble or alternatively the material can be re-used in the construction phase where fill material is required.
- The sewer line will be inspected by the HOA to ensure there are no leaks. Should leaks be detected immediate action will be taken to avoid pollution of the open space areas.
- Construction phase will be monitored by an environmental control officer (ECO).
- Minimum disturbance for installation of the fences.
- Ongoing alien invasive clearing practices for the open space areas;
- Permitting for trimming of any protected trees along existing trails (maintenance), fencing (installation/maintenance) and fire breaks.

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

General construction waste during the development phase of the proposed project. Waste produced during construction will be collected and removed by appointed contractors to a registered waste

management facility (records must be kept and provided to the environmental control officer for auditing purposes). Alternatively, the material can be re-used in the construction phase where fill material is required.

General household/domestic waste will be generated during the operational phase (approximately 20kg of solid waste per household per week) of the proposed development, with the homeowner association administering the collection at each residential unit to a communal refuse facility (at the entrance of the gated community).

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

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

The use of a combination of gas, heat pumps, solar geysers, dual flush toilets, low flow showers and rainwater tanks must be implemented to reduce pressure on non-renewable resources.

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

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

##### Negative impact:

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

##### Positive impacts:

- Optimise vacant land.
- Employment opportunities during construction and operational phases.

##### Socio-economic impacts:

- Change in character and sense-of-place from an open property to a residential estate with mixed-density residential units.
- Employment opportunities during the construction and operational phases.
- Increase the holistic financial sustainability of Mossel Bay Municipality.

##### Positive and negative ecological impacts:

- Result in limited loss of sensitive thicket vegetation.
- Continuous management of alien invasive vegetation within the study site.

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

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

## **SECTION F: PUBLIC PARTICIPATION**

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

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

Not applicable.

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

Please refer to Appendix F for copies of advert, site notices, notifications & stakeholder register. The report will be updated with comments received during the public participation period of the Draft Basic Assessment Report.

- **Neighbouring property owners** were identified using CapeFarmMapper.
- Adjacent neighbouring property owners were compiled into a list sent to the Mossel Bay Municipality for confirmation of **contact details** into the POPIA.
- **Key Authorities** were identified according to whether or not they have a mandated interest in the area/site.
- **Local Councillor** was verified with the Mossel Bay Municipality.
- **Site Notices** were placed at Five separate locations on the site calling for I&APs to register and review the **Draft Basic Assessment Report (DBAR)**.
- **Written notifications** were sent to all potential I&APs via email/post informing of the availability of the DBAR and the opportunity to register as an I&AP.
- **Advert** appeared in the *Mossel Bay Advertiser* on 06 September 2024 for I&APs to register and submit comment on the DBAR.

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

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

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

- CapeNature
- Department of Health
- Department of Agriculture
- Oceans and Coast
- Provincial Roads
- Department of Forestry
- Mossel Bay Municipality
- Garden Route District Municipality
- SACAA
- Heritage Western Cape
- Transnet

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

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

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

To be updated for the Final Basic Assessment Report.

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

To be updated for the Final Basic Assessment Report.

**Note:**

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

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

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

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

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

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

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

## SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

### 1. Groundwater

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

### 2. Surface water

2.1.	Was a specialist study conducted?	YES	NO
2.2.	Provide the name and/or company who conducted the specialist study.		

Dr Jackie Dabrowski (Confluent Environmental (Pty) Ltd)

2.3. Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.

According to Cape Farm Mapper the southern portion of the site is mapped to contain an Aquatic ESA (Figure 11).

Confluent Environmental was appointed to undertake an Aquatic Features Assessment in 2022 on the subject property in which it was concluded that based on the results of a desktop study and site inspection, it is not confirmed that a natural wetland is present as indicated in the NFEPA layer. The findings of the Aquatic Features Assessment is consistent with the revised National Wetland Map 5, which does not indicate a wetland on the proposed development site.

It was therefore confirmed that there are no aquatic sensitivities present on the proposed development sites despite an earlier report by Dr Jan Vlok (Botanical Report from previous application – refer to Addendums).



Figure 11: Ecological Support Areas map of proposed development site (CapeFarmMapper, 2024).

**3. Coastal Environment**

3.1.	Was a specialist study conducted?	YES	NO
3.2.	Provide the name and/or company who conducted the specialist study.		
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.		
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 development is not located in coastal public property nor within the littoral active zone and will have no effect on surrounding coastal public properties. None of the subject properties are designated as coastal access land.
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#### 4. Biodiversity

4.1.	Were specialist studies conducted?	YES	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		
Bianke Fouche (Confluent Environmental (Pty) Ltd)			
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		
<p>The following key resources were used during the biodiversity studies:</p> <ul style="list-style-type: none"> <li>• The DFFE screening tool listed SCC.</li> <li>• 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.</li> <li>• iNaturalist observations of the property and surrounding areas.</li> <li>• 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).</li> <li>• 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).</li> <li>• Cape Farm Mapper for additional spatial information required for the site.</li> <li>• Chief Directorate: National Geo-spatial Information (CD: NGI) Geospatial Portal and Google Earth for the acquisition of historical aerial imagery of the site.</li> <li>• 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 using the Vegetation of South Africa, Lesotho, and Swaziland (Mucina &amp; Rutherford, 2006).</li> </ul>			
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 proposed development site does not contain any mapped Critical Biodiversity Areas (CBA) or Ecological Support Areas (ESA) (Figure 10). It is noted that the area contains a <i>mapped Aquatic ESA</i> associated with a wetland, however the findings of the Aquatic Features Assessment is consistent with the revised National Wetland Map 5, which does <b>not indicate a wetland</b> on the proposed development site.</p> <p>The majority of the proposed development site is mapped as Other Natural Areas.</p> <p><b>Other Natural Areas:</b></p> <p><u>Definition:</u> These areas retain most of their natural character and perform biodiversity and ecological infrastructure functions but have not been prioritised in the current Western Cape Biodiversity Spatial Plan.</p> <p><u>Objective:</u> Minimise habitat and species loss to ensure ecosystem functionality through strategic landscape planning. Some flexibility in permissible land uses, but authorisation may still be required for high-impact uses.</p>			
4.5.	Explain what impact the proposed development will have on the site specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development.		

According to the SANBI Red List of Ecosystems Remnants map, the proposed development site is mapped to contain Hartenbos Dune Thicket (Endangered) (Figure 12 and Figure 13).



Figure 12: SANBI Red List of Ecosystems Remnants map of proposed development site (CapeFarmMapper, 2024).



Figure 13: SANBI Red List of Ecosystems of proposed development site (red area representing endangered Hartenbos Dune Thicket; white area representing transformed areas) (SANBI BGIS Map Viewer, 2024).

It is noted that the SANBI Datasets and CapeFarmMapper Datasets are similar.



**Figure 14: Map indicating the vegetation present on RE/2841 as well as Erf 5574 (Confluent Environmental, 2024).**

Following site inspection by the botanical specialist it is noted that the “Transformed Recently Cleared Invaded Area” represents the area that was **cleared of Australian myrtle** to inform this development application. The area is recovering with pioneer plant species, most notable Bietou (*Osteospermum moniliferu*) with thicket clumps persisting and recovering around the transformed area.

The loss of habitat due to the proposed development will **not reduce the ability to meet conservation targets of Hartenbos Dune Thicket**.

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 site is not located within a protected area nor a National Protected Area Expansion Strategy: Focus Area.

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

**Terrestrial Animal Species:**

The DFFE screening tool report identified four sensitive bird species as well as one invertebrate specie to possibly occur on the proposed development property:

- Aves-Bradypterus sylvaticus: Not observed on site and the preferred habitat for this species is fynbos and not thicket which is present on RE/2841.
- Aves-Circus ranivorus: Not observed on site. This specie is considered a waterbird. There are no watercourse features present on the proposed development site.

- Aves-Neotis denhami: Not observed on site. The preferred habitat for this specie is cultivated pastures and open grasslands or savannas.
- Aves-Polemaetus bellicosus: Not observed on site. This specie nests in tall trees and prefers open farmland with clumps of trees, savanna and semi-desert habitats.
- Invertebrate-Aneuryphymus montanus: Not observed on site. This specie prefers sclerophyllous fynbos habitat which is not present on RE/2841.

In addition to the five sensitive species identified in the Screening Tool Report, the faunal specialist also assessed likelihood of occurrence of an additional eight (8) faunal species. However, it was concluded that none of the assessed thirteen species were observed on site. All the assessed faunal species have a Low likelihood of occurrence with the exception of the Agulhas Long-billed Lark (*Certhilauda brevirostris*) that has a Low-Medium likelihood of occurrence. It is therefore recommended that should any Agulhas Long-billed Lark nests be found or suspected to occur on site, construction should be paused until such time that their presence can be confirmed by a faunal specialist.

This recommendation is included in the Environmental Management Programme forming part of this Draft Basic Assessment Report.

Animal movement from west-east will not be fragmented by the proposed development as perimeter fencing will be designed in accordance with the CapeNature policy document on Fencing & Enclosures of Game, Predators & Dangerous Animals in the Western Cape (installation methods, maintenance methods etc). Animal movement from north-south is already fragmented by the R102 provincial road (Figure 15).



Figure 15: Faunal movement corridors in the northern and southern boundary of the Remainder of Erf 2841.

## 5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.	
No geographical aspects will be affected.	

## 6. Heritage Resources

6.1.	Was a specialist study conducted?	YES	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
Stefan de Kock (Perception Planning)			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		

## 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.	
<p>Heritage Assessment undertaken as part of a previous application in 2008 and HWC endorsed development on the property at the time. New heritage/archaeological studies are not required in terms of the endorsement for development of the site.</p> <p>HWC will be consulted as part of this Basic Assessment application process.</p> <p>In the event that any heritage resources, including evidence of graves and human remains, archaeological material and paleontological material be discovered during the development, all work must be stopped immediately, and Heritage Western Cape must be notified without delay.</p> <p>The site must be monitored during major earthworks by an archaeologist appointed by the developer.</p>	

## 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 proposed development site is bordered by the R102 provincial road to the north, single residential suburban type dwellings to the west, larger plots located outside the Urban Edge to the south utilised for single residential/tourism, and vacant land to the east.</p> <p>Private residential properties in the area are associated with the high-end income bracket. Properties are of reasonable size, mostly with large homes.</p> <p>The area is fully serviced and Municipal services are well maintained with a high level of service delivery. Road infrastructure is of good condition and maintenance done when required.</p> <p>Due to the proximity of the various coastal suburbs that make up this Tergniet – Great Brak River area, the area offers both permanent as well as semi-permanent accommodation through short-term rental, as well as ownership.</p> <p>Residents in the area are mostly well-educated, highly qualified and either employed or retired. Access to the beach and estuary makes it a popular area for walking/hiking and cycling.</p>	
8.2.	Explain the socio-economic value/contribution of the proposed development.

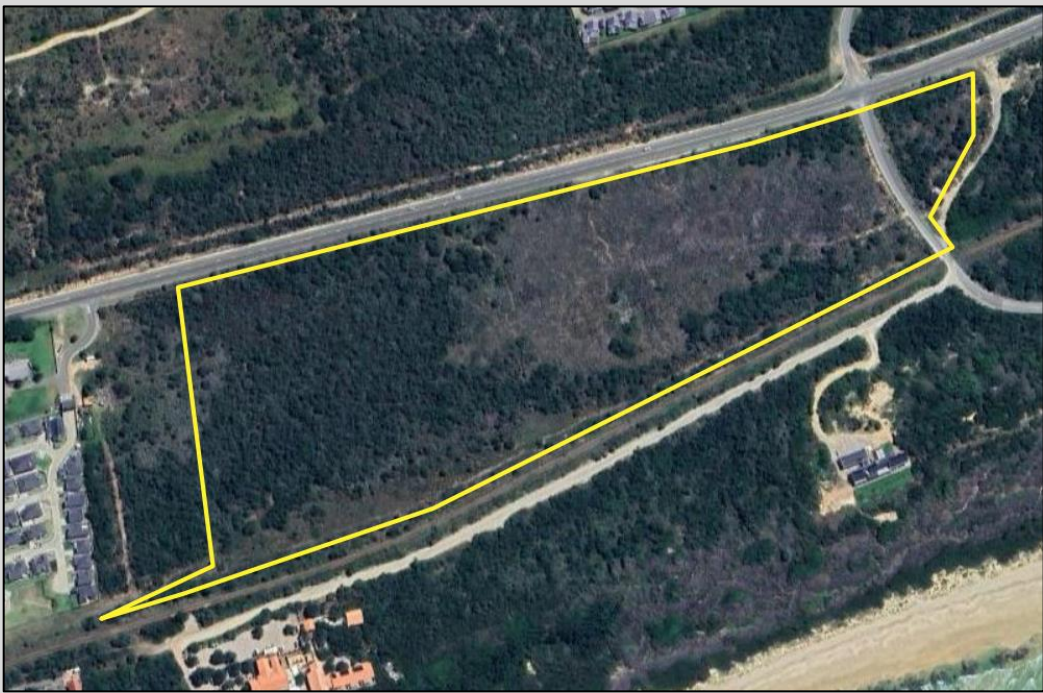
<p>Development of a residential estate, in this particular area is unlikely to deter from the character/value of the greater area.</p> <p>The proposed development will contribute to the socio-economic value of Mossel Bay Municipality in the following ways:</p> <ul style="list-style-type: none"> <li>• Create temporary employment opportunities during pre-construction and construction phase.</li> <li>• Create employment opportunities during operational phase.</li> <li>• Create temporary employment opportunities for contractors, small businesses and suppliers during construction and operational phases.</li> <li>• Increase in the attraction of Mossel Bay Municipality.</li> <li>• Improve the holistic financial sustainability of the local municipality due to additional rates and taxes being generated.</li> </ul>	
8.3.	<p>Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.</p> <p>The development is proposed as a private development. The 'community' in which the site is located is not characterised as impoverished and it is unlikely that community upliftment (projects) is required.</p>
8.4.	<p>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> <p><b>Pre-construction and Construction Phase:</b></p> <ul style="list-style-type: none"> <li>• Noise impact – construction activities will be limited to normal working hours (07:00 – 18:00) with no activities to take place on Sundays and public holidays.</li> <li>• No impact regarding odours.</li> <li>• Minimal dust pollution – construction vehicle movement will be limited to the designated access routes and dust control measures will be put in place for the work areas.</li> <li>• Temporary traffic congestion when the new traffic circle will be constructed in Beach Boulevard.</li> </ul> <p><b>Operational Phase:</b></p> <ul style="list-style-type: none"> <li>• No noise impact.</li> <li>• No impact regarding odours considering the design of the proposed on-site package plant.</li> <li>• Low impact regarding visual character and sense of place.</li> <li>• Inconvenience to some residents from the adjoining Poortjies area in the South as obtained access to the backyards of their properties over this property (no record of consent from the land owner) and these owners will have to stop making use of these accesses over private land and revert to accessing their erven from their lawful accesses.</li> </ul> <p><b>Visual Impact Assessment Summary:</b></p> <p>The findings of the landscape and visual impact assessment undertaken by Visual Resources Management Africa, is that the proposed development alternative will be preferred over the No-Go status quo option due to the following reasons:</p> <ul style="list-style-type: none"> <li>• <i>In terms of regional and local planning fit for landscape and visual related themes, the expected visual/ landscape policy fit of the landscape change is rated High.</i></li> <li>• <i>Local zone of visual influence with some visual buffering from urban residential receptors to the west of the property.</i></li> <li>• <i>Continuation of the existing nodal development precedent of clustered development surrounded by conservation worthy nature areas.</i></li> <li>• <i>No loss of significant landscapes that are being used as visual resources.</i></li> <li>• <i>Retaining the status quo would result in limited economic benefit to the local area and a continued management plan to ensure that regrowth of the alien trees does not take place.</i></li> <li>• <i>Medium Negative visual impact significance for short-term construction with mitigation.</i></li> </ul>

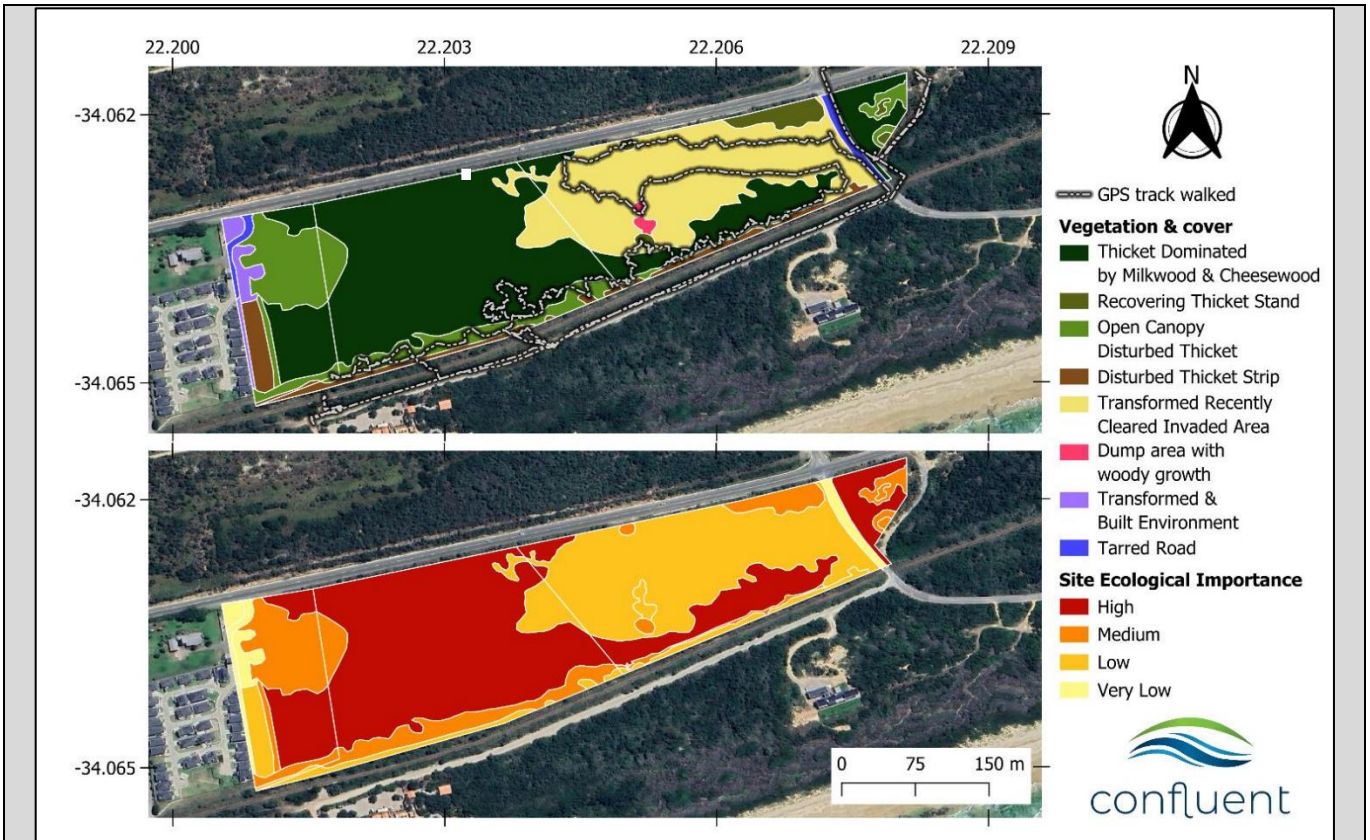
- *Low Positive visual impact significance for long-term operation with mitigation.*

The Visual Impact Assessment recommended that the proposed development should be authorised with mitigation as it is unlikely to result in a significant loss of landscape or visual resources. Mitigation measures stipulated in the VIA will be accommodated in the Environmental Management Plan and this Draft Basic Assessment Report.

## SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

### 1. Details of the alternatives identified and considered

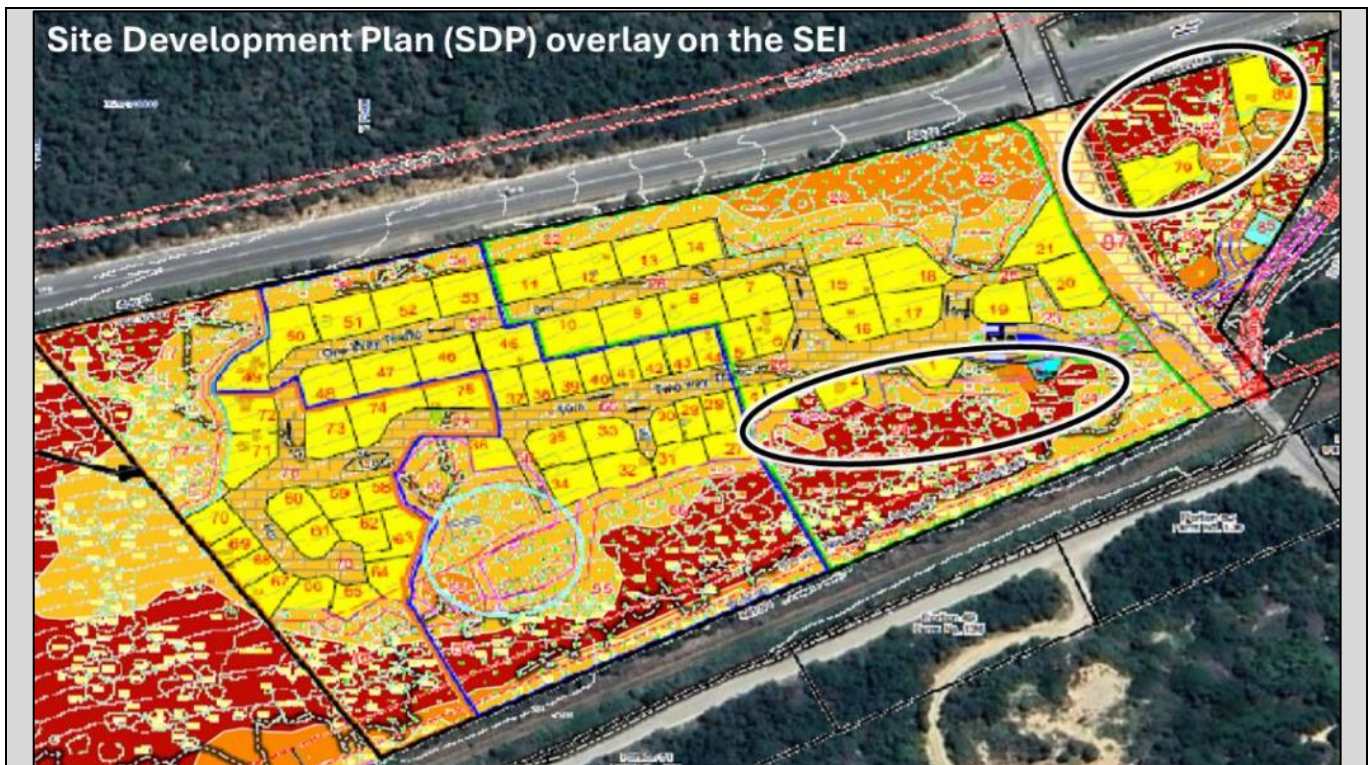
1.1.	Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred property and site alternative.	
Remainder of Erf 2841 located south of the R102 in Tergniet, Mossel Bay Municipality.	
Provide a description of any other property and site alternatives investigated.	
At the outset of the environmental investigation process, a much larger property (Erf 2841 prior to subdivision and consolidation with neighbouring property to west) was considered for development (Figure 16) – refer to notes on the previous pre-application process undertaken by Andrew Weste Consulting.	
	
<p><b>Figure 16: Property considered for development at the outset of the environmental investigations (CapeFarmMapper, 2024).</b></p>	
<p>Following initial sensitivity analyses done by Mr Jan Vlok and Mr Ken Coetzee from the previous investigation, it was determined that the proposed development property should be restricted to the area where Australian Myrtle persisted, in order to accommodate sensitive thicket vegetation in the Western Portion of Erf 2841. Erf 2841 has since been consolidated and subdivided again into two portions, creating the Remainder of Erf 2841 (proposed development property).</p>	
<p>The sensitivities were confirmed by Confluent Environmental in their updated studies undertaken during the course of 2024 (Figure 17).</p>	



**Figure 17: Maps indicating the vegetation present on the Remainder of Erf 2841 as well as adjacent properties to the west (Top), and the corresponding site ecological importance (SEI) categories that are applicable to the different areas (Confluent Environmental, 2024).**

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

The preferred site alternative was identified considering the overall site sensitivity of the Remainder of Erf 2841, with development being specifically positioned within already transformed areas (cleared of alien vegetation) with minimum encroachment into highly sensitive thicket vegetation (Figure 18).



**Figure 18: Site Ecological Importance map overlaid onto the proposed development footprint. The map indicates two positions where minimal encroachment into highly sensitive thicket vegetation will take place (Confluent Environmental, 2024).**

The loss of habitat due to the proposed development will not reduce the ability to meet conservation targets of Hartenbos Dune Thicket.

The proposed development makes accommodation for ~2.18ha of open space areas to be maintained in a natural state and aims to rehabilitate these areas to be classified as highly sensitive in terms of Site Ecological Importance. Spatially that implies that all areas indicated in 'ORANGE' colour ranges will be improved and restored to a similar sensitivity level associated with the 'RED' untransformed Dune Thicket.

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

- An aquatic specialist was appointed by the applicant to assess possible aquatic features on the Remainder of Erf 2841. It was determined that no aquatic features are present on the proposed development site.
- Botanical/Biodiversity specialists were appointed to map the habitat sensitivity of the remaining thicket area and amended to avoid this sensitive habitats.
- An overlay was performed of the various sensitivity maps to arrive at a suitable 'development area' which was given to the Applicant to inform the preferred layout.
- Heritage consultant was appointed to assess possible heritage related resources on the proposed development site. No such resources were identified.
- Protected Tree Species survey was undertaken in order to map and avoid as many of the protected trees/clumps present on the proposed development site.
- The information gathered was used by the Urban Planner to compile a site development plan presented herewith as the preferred alternative.

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

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

List the positive and negative impacts that the property and site alternatives will have on the environment.	
<p><b>Positive Impacts:</b></p> <ul style="list-style-type: none"> <li>• Development will be focused on the already disturbed portion of Re/2841 with less dense/sensitive vegetation compared to the remainder of the property.</li> <li>• Development will make use of existing municipal water, sewage, and electrical services.</li> <li>• Development will manage alien invasive vegetation species.</li> <li>• Development will maintain as many protected indigenous trees on the property as possible.</li> <li>• Development will create employment opportunities.</li> <li>• Additional income to the local municipality through municipal rates and taxes.</li> </ul> <p><b>Negative Impacts:</b></p> <ul style="list-style-type: none"> <li>• Permanent loss of ~2.18ha of already transformed habitat.</li> <li>• Fragmentation of intact habitat with the positioning of residential units in an otherwise natural environment.</li> <li>• Additional pressure on non-renewable (municipal) resources such as water and electricity.</li> <li>• Additional traffic in the R102 and Souwesia Avenue, especially during the peak holiday periods.</li> <li>• Additional waste generation that must be accommodated through the Municipal waste disposal systems.</li> <li>• Additional effluent that must be accommodated through the Municipal sewage processing systems.</li> <li>• Temporary noise impact during pre-construction and construction phases.</li> </ul>	
1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred activity alternative.	
<p><b>Alternative 1 (preferred):</b></p> <p>The development of a residential development consisting of 68 erven (General Residential I), with an average size of approximately 220m<sup>2</sup> / erf, on Remainder of Erf 2841 (~5.25ha) with associated sewerage infrastructure on Erf 5574, Tergniet (Figure 1).</p> <p>Remainder of Erf 2841 is currently zoned Agriculture Zone I, and should Environmental Authorisation be obtained, it is proposed to subdivide and rezone the property to the following:</p> <ul style="list-style-type: none"> <li>• 68 x General Residential Zone I (~1.4937ha).</li> <li>• 2 x Utility Zone (~0.0167ha).</li> <li>• 11 x Open Space Zone II (~2.8163ha).</li> <li>• 5 x Transport Zone III (~0.6712ha).</li> <li>• 1 x Transport Zone I (~0.2525ha).</li> </ul> <p>Agricultural farm fencing is currently present on the outer boundaries of the Remainder of Erf 2841 which allows animal movement from/into the proposed development property and therefore not resulting in fragmentation of faunal corridors. All security/permitting fencing forming part of the proposed development must be in line with the CapeNature policy document on Fencing &amp; Enclosures of Game, Predators &amp; Dangerous Animals in the Western Cape.</p> <p><b>Services:</b></p> <p><b>Water:</b> The proposed development is proposed to be supplied by the Mossel Bay Municipality water supply network (specifically the Great Brak River area). It is proposed to connect via a 160mm<math>\varnothing</math> water pipeline to the newly installed 200mm<math>\varnothing</math> water pipeline in the R102 road reserve (Figure 4). The internal water network will consist of 75mm – 110mm diameter uPVC pipelines with 25mm<math>\varnothing</math> metered erf connections.</p>	

**Sewerage:** Remainder of Erf 2841 does not contain any existing sewage infrastructure. The internal sewerage network will consist of 160mm $\varnothing$  pipes with 110mm $\varnothing$  diameter erf connections. The internal sewerage network will drain towards a new sewerage pump station (within an existing services servitude adjacent to the railway line) proposed on the southern boundary of Erf 5574 from which sewage will be pumped towards the regional pump station on Erf 2839 via a new gravity/pump line (Figure 4).

**Access:** Access to the proposed development will be directly off Souwesia Avenue. Souwesia Avenue connects to the R102 which is a Provincial Road linking Tergniet with Great Brak. Internal access roads will be 3 – 6.2m wide paved roads with edging on one side and a mountable curb on the other side. The proposed entrance gatehouse will allow for a 36m stacking distance from the position of the access boom to the Souwesia Avenue road reserve.

**Stormwater:** Remainder of Erf 2841 has a natural slope in a southern direction. Stormwater structures will be designed to act as energy dissipater and soak away systems simultaneously into the green belt area (Figure 3).

**Solid Waste:** All solid waste will be disposed at the local Municipal dump site. The removal of solid waste and management thereof will be done by Mossel Bay Municipality as per a Service Agreement between the Mossel Bay Municipality and the Developer.

**Electricity:** The Mossel Bay Municipality will provide a 400kVA mini substation to be funded by the developer of RE/2841. The total estimated maximum demand for the entire development will amount to 216kVA (ADMD). The new mini substation will be placed within the proposed development and will be ring fed from an existing 4-way RMU located on the corner of R102 and Fynbos Avenue (Erf 2839) (Figure 5).

Provide a description of any other activity alternatives investigated.

No activity alternatives were considered as the Applicant intends to develop a residential estate.

Quoted from the Pre-Application BAR compiled by Andrew West previously, a proposal was considered for:

- “26 group housing erven  $\pm$  450m<sup>2</sup> in size,
- 181 group housing erven for retirement resort purposes with the sizes of these erven varying from  $\pm$ 70 m<sup>2</sup> to  $\pm$ 600 m<sup>2</sup> to accommodate a variety of housing types that will be erected on these erven.
  - developed as assisted living flats and home-care facilities - Community Zone III. The size of this property is approximately 8 348m<sup>2</sup> and it is proposed to make provision for  $\pm$ 100 units (assisted living & home nursing) and frail care facilities in a double storey building including a dining area, reception and administration as well as parking.
  - zoned as Business Zone II and the proposed size is 0,4632ha. This erf will be located outside the proposed entrance gate as indicated on the proposed lay-out plan.
  - 9 erven as private open space - Open Space Zone II ‘.

Considering the subsequent clearing of Australian Myrtle, updated specialist studies and consolidation/subdivision to exclude the western portion that is deemed to contain higher sensitive vegetation/habitat, this original development proposal is not being considered any further.

Provide a motivation for the preferred activity alternative.

#### **Alternative 1 (Preferred):**

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

- Development will manage alien invasive vegetation species.

- Development will maintain as many protected indigenous trees on the property as possible.
- Development will create temporary and permanent employment opportunities.
- Additional income to the local municipality through municipal rates and taxes.
- Improved maintenance/management of the riparian area of Keurbooms Estuary.
- Does not encroach beyond the property boundaries.
- Services are available for the proposed development (as confirmed by the Municipality).
- Access can be obtained via existing road infrastructure.
- Development is restricted to areas that are already transformed.
- Highly sensitive areas are excluded from the development proposal.

Provide a detailed motivation if no activity alternatives exist.

The proposal is regarded as desirable because the proposed development:

- Is unlikely to impact negatively on existing land use rights of neighbouring property owners;
- It will not prevent any surrounding owner to exercise their legal land use rights;
- Will create employment opportunities during the construction and operational phases.
- It will optimise vacant land in an urban setting.
- It will contribute to the holistic financial sustainability of Mossel Bay Municipality.

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

Impact	No-Go Alternative	Alternative 1 (Preferred)
<b>Positive</b>	No vegetation will be disturbed. Habitat will remain intact. No fragmentation of ecosystem patterns/processes.	Invasive alien vegetation will be managed better through designated management and levees that will be allocated for environmental management inclusive of invasive alien management in particular. Employment opportunities will be created. Create an additional attraction and accommodation in an area that is popular amongst tourists. Additional rates and taxes will be generated for the Mossel Bay Municipality.
<b>Negative</b>	Invasive alien vegetation will be less maintained since the area is not utilised by the residents/homeowners or visitors that generally obliges the owners/managers to keep invasive alien vegetation under control. No additional employment opportunities will be created. Property will remain vacant, and concern has been raised about land invasion. No addition attraction for Mossel Bay Municipality. No additional rates and taxes will be generated towards Municipal income.	Permanent loss of ~2.18ha of vegetation. Fragmentation of intact habitat and ecosystem. Additional traffic in R102 and Souwesia Avenue especially during peak holiday periods. Additional pressure on non-renewable Municipal resources.

	Risk of informal settlement within the remaining natural areas.	
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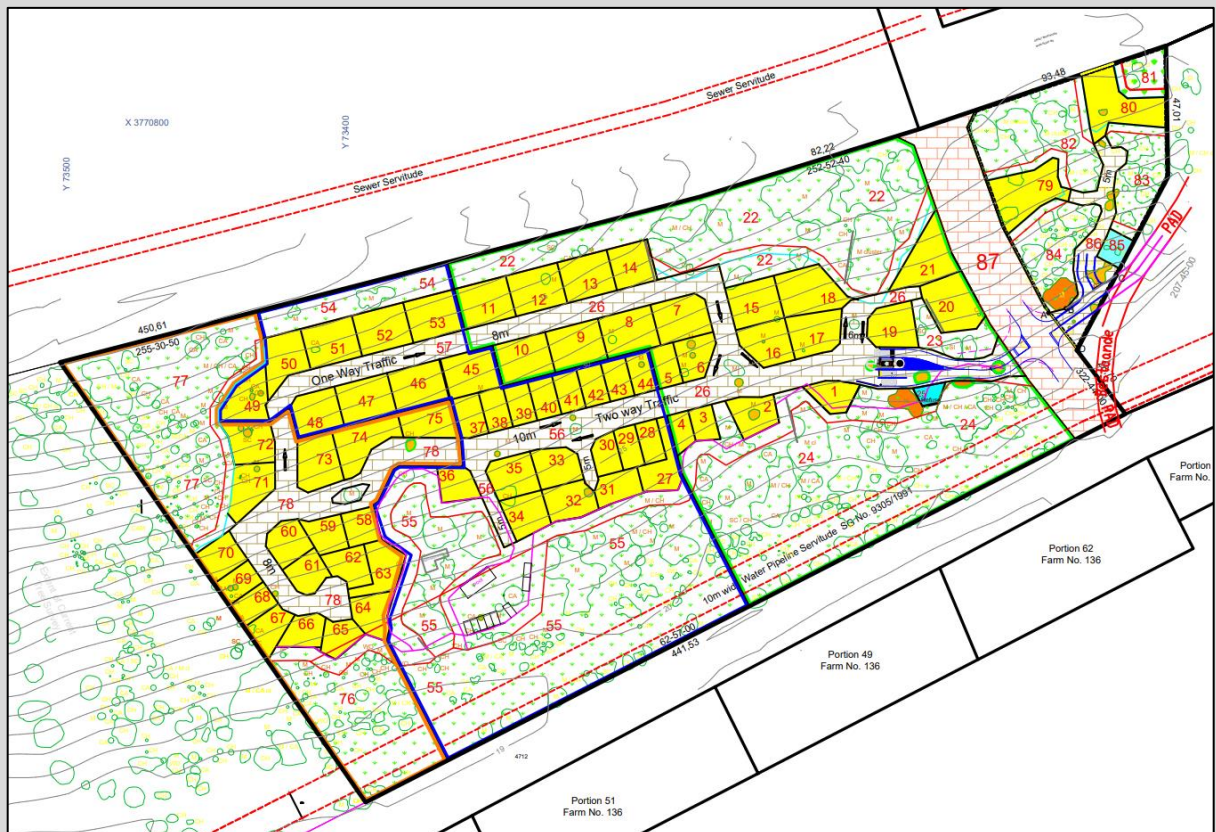
1.3. Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts

Provide a description of the preferred design or layout alternative.

**Alternative 1 (Preferred):**

The preferred layout alternative consist of the following:

- 68 x General Residential Zone I (~1.4937ha).
- 2 x Utility Zone (~0.0167ha).
- 11 x Open Space Zone II (~2.8163ha).
- 5 x Transport Zone III (~0.6712ha).
- 1 x Transport Zone I (~0.2525ha).



LEGEND		Portion Nos.	Zonings	Size (ha)	% of development	
1. Application is made for rezoning of a portion of Erf 2841, Great Brak River from Agricultural Zone I to Subdivisional Area for a development consisting 68 Group Housing erven, private open spaces, private streets, utility erf and a public street.		1 - 21, 27 - 53, 58 - 75, 79 & 80	Gen Res Zone I	1,4937	28.45	
2. Application is made for subdivision of the Subdivisional Area as follows:		25, 85	Utility Zone	0.0167	0.32	
68 Erven	= Gen Res Zone I (ave size 220m²)	22 - 24, 54, 55, 76, 77, 81 - 84	Open Space Zone II	2.8163	53.64	
2 Erven	= Utility Zone	26, 56, 57, 78, 86	Transport Zone III	0.6712	12.78	
11 Erven	= Open Space Zone II	87	Transport Zone II	0.2525	4.81	
5 Erven	= Transport Zone III	<b>TOTAL</b>		<b>5.2504</b>	<b>100.00</b>	
1 Erf	= Transport Zone II					

**Figure 19: Preferred layout alternative (Formaplan, 2024).**

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

No other design or layout alternative were investigated other than the one initially considered by Andrew West as part of the previous application – no longer investigated/assessed.							
Provide a motivation for the preferred design or layout alternative.							
<p>The following key points were taken into account during the design of the preferred alternative layout:</p> <ul style="list-style-type: none"> <li>• The preferred alternative layout was specifically designed to avoid the majority of the surveyed protected tree species, with development being limited to already disturbed vegetation/habitat.</li> <li>• The preferred alternative layout makes accommodation for ~2.82ha (~53.64% of total erf size) of open space areas to be maintained in a natural state.</li> <li>• The preferred alternative layout was designed with significant input from specialist studies (botanical, biodiversity and visual).</li> <li>• Focus was placed on the area that was densely covered with Australian Myrtle trees for many years.</li> </ul>							
Provide a detailed motivation if no design or layout alternatives exist.							
The preferred alternative layout was designed subject to significant environmental constraints identified by specialist studies. In order to avoid highly sensitive features and take into identified mitigation measures, it was not possible to consider any alternative design layout, as this would result in the loss of sensitive features identified during specialist studies.							
List the positive and negative impacts that the design alternatives will have on the environment.							
	<table border="1"> <thead> <tr> <th>Impact</th> <th>Alternative 1 (Preferred)</th> </tr> </thead> <tbody> <tr> <td><b>Positive</b></td> <td> <ul style="list-style-type: none"> <li>• Avoids as many protected indigenous trees as possible.</li> <li>• Allows for 10m visual buffer from the R102 on the northern boundary of the Remainder of Erf 2841.</li> <li>• In line with the management objectives of the Western Cape Biodiversity Spatial Development Framework.</li> <li>• Allows for the management of alien invasive species in the open space areas of the property.</li> </ul> </td> </tr> <tr> <td><b>Negative</b></td> <td>Permanent loss of ~2.18ha of vegetation.</td> </tr> </tbody> </table>	Impact	Alternative 1 (Preferred)	<b>Positive</b>	<ul style="list-style-type: none"> <li>• Avoids as many protected indigenous trees as possible.</li> <li>• Allows for 10m visual buffer from the R102 on the northern boundary of the Remainder of Erf 2841.</li> <li>• In line with the management objectives of the Western Cape Biodiversity Spatial Development Framework.</li> <li>• Allows for the management of alien invasive species in the open space areas of the property.</li> </ul>	<b>Negative</b>	Permanent loss of ~2.18ha of vegetation.
Impact	Alternative 1 (Preferred)						
<b>Positive</b>	<ul style="list-style-type: none"> <li>• Avoids as many protected indigenous trees as possible.</li> <li>• Allows for 10m visual buffer from the R102 on the northern boundary of the Remainder of Erf 2841.</li> <li>• In line with the management objectives of the Western Cape Biodiversity Spatial Development Framework.</li> <li>• Allows for the management of alien invasive species in the open space areas of the property.</li> </ul>						
<b>Negative</b>	Permanent loss of ~2.18ha of vegetation.						
1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.						
Provide a description of the preferred technology alternative:							
Provide a description of any other technology alternatives investigated.							
Provide a motivation for the preferred technology alternative.							
Provide a detailed motivation if no alternatives exist.							
List the positive and negative impacts that the technology alternatives will have on the environment.							
Provisions for resource conservation have been included in the Draft Environmental Management Programme (Appendix H) under Section 6.							
1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.						
Provide a description of the preferred operational alternative.							

Please also refer to Section 1.2,1.3 and 1.4 under 'Alternatives'.	
Provide a description of any other operational alternatives investigated.	
The proposed development does not trigger any operational listed activities.	
Provide a motivation for the preferred operational alternative.	
Provide a detailed motivation if no alternatives exist.	
List the positive and negative impacts that the operational alternatives will have on the environment.	
1.6.	The option of not implementing the activity (the 'No-Go' Option).
Provide an explanation as to why the 'No-Go' Option is not preferred.	
<p>The No-Go / Status Quo alternative with no development of a residential estate. Under this alternative, the current land use would continue within the primary rights of agriculture. Considering the Remainder of Erf is located within the Urban Edge and is designated for urban development, this alternative is unlikely to remain in place for much longer. The subject property is considered prime residential property and as such it will be subject to development at some point in time.</p> <p>The No-Go / Status Quo alternative is not preferred due to the following reasons:</p> <ul style="list-style-type: none"> <li>• The HOA will maintain invasive alien vegetation across the proposed open space areas.</li> <li>• The large vacant property is of concern potentially linked to the threat of land invasion of vacant portions of land within urban areas / poaching and wild fires.</li> <li>• Considering that the site does contain areas where development can be considered without compromising ecological integrity, patterns or processes, optimising vacant land within the urban edge is worth considering.</li> <li>• Development rights will contribute to the economic sustainability of the Municipality through rates and taxes that is much higher than the current rates for open space.</li> <li>• The development footprint is not deemed unacceptable considering that the majority of the site will still remain natural with ecological functioning, whilst increased economic benefits will arise from the preferred alternative.</li> <li>• Compliance with spatial planning and protocols for infill development within urban areas.</li> </ul>	
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.
Should any reasonable and feasible alternatives be proposed as part of the stakeholder engagement process, such will be considered and responded to as part of the ongoing environmental process.	
1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.
<p>The proposed development is deemed preferable and suitable for the proposed property for the following reasons:</p> <ul style="list-style-type: none"> <li>• Site location is suitable within the urban context in terms of proximity to town centres, amenities and public beaches.</li> <li>• Accessibility is existing with well-maintained, existing access road network (access can be gained from existing provincial roads).</li> <li>• Partial development of the site is aligned with the planning principles of optimising vacant land within an urban environment.</li> </ul>	

- The development of a residential estate in the location is deemed compatible with the surrounding land use character which consist of single residential, apartments, resorts and other holiday accommodations.
- Highly sensitive biodiversity areas/corridors will be avoided and actively maintained.
- The development footprint allows for a large Open Space areas.

## 2. "No-Go" areas

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

The delineated Open Space Areas are considered as No-Go areas and should be avoided during the pre-construction and construction phases.

No-Go areas for environmentally sensitivity that have been identified, must be established/demarcated before commencement of construction. All personnel involved in the development must be briefed about the exact location of the "No-Go" areas.

**IMPORTANT NOTE:** The area indicated as No-Go is not intended to be set-aside as an area where there may be no access whatsoever. This area will be accessible to future residents for recreational use (along existing pathways/trails), alien clearing teams and/or fire management teams. Vehicle access in this area however is limited to only instances where the removal of alien vegetation biomass is required (and then it must be along existing vehicle routes only) and/or when vehicles must access for fire protection measures. This is to ensure minimal disturbance to the sensitive environment and habitat at all times.

## 3. Methodology to determine the significance ratings of the potential environmental impacts and risks associated with the alternatives.

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

### **Criteria for Assessment**

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

These criteria include:

- **Nature of the impact**

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

- **Extent of the impact**

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

- **Duration of the impact**

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

- **Intensity**

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

- **Probability of occurrence**

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

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

- **Legal requirements**

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

- **Status of the impact**

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

- **Accumulative impact**

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

- **Degree of confidence in predictions**

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

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

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

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

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

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

#### 4. Assessment of each impact and risk identified for each alternative

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

<b>Terrestrial Biodiversity and Botanical Impact Assessment</b>		
<b>Alternative:</b>	<b>Alternative 1 (Preferred)</b>	<b>No-Go Status Quo Alternative</b>
<b>Construction Phase</b>		
<b>Potential impact and risk:</b>	<b>Loss of Hartenbos Dune Thicket (Endangered) habitat due to earthworks and other construction related activities for the Remainder of Erf 2841</b>	
Nature of impact:	Permanent loss and fragmentation of Hartenbos Dune Thicket	
Extent and duration of impact:	Without Mitigation: Extent – Limited; Duration – Permanent With Mitigation : Extent – Very Limited; Duration - Permanent	Extent – Very Limited; Duration - Immediate
Consequence of impact or risk:	Fragmentation and loss of an endangered (EN) ecosystem type (Hartenbos Dune Thicket). The loss of habitat that could have counted towards the Western Cape Milkwood Forest inventory. Although this represents an insignificant loss (i.e., 0.01 % of the total remaining area of Hartenbos Dune Thicket), it does contribute towards a cumulative loss of Hartenbos Dune Thicket due to development, which over time could lead to a negative change in the conservation status of this vegetation type.	
Probability of occurrence:	Without Mitigation: Certain With Mitigation: Certain	Highly unlikely
Degree to which the impact may cause irreplaceable loss of resources:	Without Mitigation: Medium With Mitigation: Medium	Medium

Degree to which the impact can be reversed:	Without Mitigation: Medium With Mitigation: Medium	Medium
Indirect impacts:	-	-
Cumulative impact prior to mitigation:	-	-
Significance rating of impact prior to mitigation (e.g., Low, Medium, Medium-High, High, or Very-High)	Moderate Negative	Negligible Negative
Degree to which the impact can be avoided:	-	-
Degree to which the impact can be managed:	-	-
Degree to which the impact can be mitigated:	-	-
Proposed mitigation:	<ul style="list-style-type: none"> <li>• The disturbance footprint of proposed developments should be clearly defined and demarcated to prevent unnecessary damage to the surrounding environment.</li> <li>• Protected trees, and other large trees on the site that could still be protected must be marked on the site. The marked trees are to be left undisturbed during construction, and this could be made easier by using wooden boxes around the trees.</li> <li>• Construction netting and fencing must be used to clearly indicate construction areas. Shade cloth used as fencing should be hammered into the ground using wooden pegs.</li> <li>• Clear signs for "no-go" areas for vehicles and personnel should be placed strategically on the site. No-go areas are anywhere outside of the</li> </ul>	-

	<p>direct area of influence of the construction phase.</p> <ul style="list-style-type: none"><li>• A turning circle and parking area for construction and delivery vehicles may only take place in areas that are already cleared, i.e., not between the railway and development area where some thicket vegetation remains outside of the PAOI.</li><li>• No delivery vehicles are allowed in fynbos and thicket vegetation.</li><li>• For once off deliveries, clear indications on the nearby roads should be put up to guide truck drivers to the construction site, thus avoiding divers getting lost and causing unnecessary disturbance.</li><li>• Weather reports must be checked daily to avoid heavy machinery and activities on the site during rainy weather. Following a rainfall event (excluding short periods of gentle, light rain), all construction on the site must cease temporarily.</li><li>• Where vegetation will be cleared to make way for construction, filled sandbags must be used to reduce the intensity of water runoff and flow over the site.</li><li>• Topsoil on the site (excluding topsoil under dense stands of invasive plants in the previously cleared area) in new excavation areas must be stripped to a depth of ca. 30cm and kept in designated piles. Topsoil piles must be suitably covered with a geotextile to prevent any additional invasive species seeds from falling in and establishing in the soil.</li><li>• If the SDP of a proposed development does not have enough space for the storage and</li></ul>	
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	<p>protection of topsoil within the disturbance envelope, then the Contractor must identify an alternative temporary stockpile area that is already transformed and where it can easily be retrieved for post-construction rehabilitation.</p> <ul style="list-style-type: none"> <li>• The topsoil piles must be clearly labelled so that it does not mix with subsoils excavated or any other construction material for the site.</li> <li>• Dust suppression mechanisms e.g., materials and regular site maintenance (e.g., cleaning surfaces and “rounding off” a workday) is essential to reduce dust, and general pollution.</li> </ul>	
Residual impacts:	-	-
Cumulative impact post mitigation:	-	-
Significance rating of impact after mitigation (e.g., Low, Medium, Medium-High, High, or Very-High)	Moderate Negative	-
<b>Potential impact and risk:</b>		
<b>A loss of protected tree species (<i>Sidoxylon inerme inerme</i> &amp; <i>Pittosporum viridiflorum</i>), and potential SCC due to earthworks and other construction related activities for the Remainder of Erf 2841</b>		
Nature of impact:	Although no SCC were found on the site, the species accumulation curve indicated that the site potentially contained many species that were not recorded during the assessment. Some of those species could have been SCC that have a high likelihood of occurrence. It is known that protected tree species and biodiversity will be lost and replaced with permanent structures on the site.	
Extent and duration of impact:	<p>Without Mitigation: Extent – Limited; Duration – Ongoing</p> <p>With Mitigation: Extent – Very Limited; Duration – Medium Term</p>	<p>Extent – Very Limited</p> <p>Duration - Immediate</p>

<p>Consequence of impact or risk:</p>	<p style="text-align: center;">Fragmentation of SCC sub-populations                      Reduction in the extent of occurrence (EOO) of SCC.                      A general loss of suitable habitat for SCC                      A loss of genetic variation within remaining SCC stands.</p> <p>A shift towards a negative change in the conservation status of the SCC and other indigenous species affected by the development. The combined effect of this development and the many other developments in the area will negatively affect the conservation status of species</p> <p>An increased risk of re-invasion of portions of the site that fall outside of the PAOI</p>	
<p>Probability of occurrence:</p>	<p>Without Mitigation: Certain                      With Mitigation: Certain</p>	<p style="text-align: center;">Highly unlikely</p>
<p>Degree to which the impact may cause irreplaceable loss of resources:</p>	<p>Without Mitigation: Medium                      With Mitigation: Medium</p>	<p style="text-align: center;">Medium</p>
<p>Degree to which the impact can be reversed:</p>	<p>Without Mitigation: Medium                      With Mitigation: Medium</p>	<p style="text-align: center;">Medium</p>
<p>Indirect impacts:</p>	<p style="text-align: center;">-</p>	<p style="text-align: center;">-</p>
<p>Cumulative impact prior to mitigation:</p>	<p style="text-align: center;">-</p>	<p style="text-align: center;">-</p>
<p>Significance rating of impact prior to mitigation (e.g., Low, Medium, Medium-High, High, or Very-High)</p>	<p style="text-align: center;">Moderate Negative</p>	<p style="text-align: center;">Negligible Negative</p>
<p>Degree to which the impact can be avoided:</p>	<p style="text-align: center;">-</p>	<p style="text-align: center;">-</p>
<p>Degree to which the impact can be managed:</p>	<p style="text-align: center;">-</p>	<p style="text-align: center;">-</p>

<p>Degree to which the impact can be mitigated:</p>	<p>-</p>	<p>-</p>
<p>Proposed mitigation:</p>	<ul style="list-style-type: none"> <li>• The proposed development can have up to a maximum disturbance envelope of 2m around the proposed development.</li> <li>• Prior to the commencement of construction and earth movement on the site, a plant search and rescue must be conducted by a suitably qualified horticultural specialist.</li> <li>• The rescued plants must be kept in a nursery that should preferably be set up on the construction site on Erf RE/2841. Alternatively, arrangements with a suitable nursery should be made to keep and care for removed plants during the construction phase of the project.</li> <li>• The rescued plants must be planted back with the aid of botanists and / or horticultural specialists within the 2m disturbance footprint around the permanent disturbance footprints. This will promote the regeneration of natural fynbos around the developments and reduce the possibility of negative edge effects on the site.</li> <li>• Any additional plants that are observed during construction within a development footprint must be rescued and added to the rescued plants in the indigenous nursery.</li> <li>• Alien clearing must be undertaken during the construction phase to prevent invasive plants from becoming large stands during this time.</li> <li>• No kikuyu grass is allowed anywhere on the site.</li> <li>• Materials used during construction must be sourced and transported responsibly to minimise</li> </ul>	<p>-</p>

	the risk of further introductions of new invasive plants and contamination of the site, and especially the fynbos vegetation.	
Residual impacts:	-	-
Cumulative impact post mitigation:	-	-
Significance rating of impact after mitigation (e.g., Low, Medium, Medium-High, High, or Very-High)	Minor Negative	-
<b>Potential impact and risk:</b>		
	<b>Remaining thicket habitat, protected trees, and plant biodiversity are negatively affected by the management of the construction site (i.e., staff, stockpiles, and equipment).</b>	
Nature of impact:	In addition to the large and obvious construction impacts, the management of materials and staff on the site is also an important impact on the site. If managed properly, many accidents and unanticipated negative losses to the expense of the environment, as well as staff can be avoided.	
Extent and duration of impact:	Without Mitigation: Extent – Limited; Duration – Ongoing With Mitigation : Extent – Very Limited; Duration – Medium Term	Extent – Very Limited; Duration - Immediate
Consequence of impact or risk:	<p>Unanticipated losses of vegetation outside of designated areas.</p> <p>Increased duration of negative construction impacts.</p> <p>Increased vulnerability to impacts of remaining habitat portions elsewhere due to a negative disturbance to the processes that are necessary to maintain biodiversity and ecosystem goods and services.</p> <p>Potential health and safety hazards on the site and in the surrounding environment.</p> <p>The creation of novel habitat that indigenous species cannot survive in, but where exotics and invasive plants thrive in.</p>	

Probability of occurrence:	Without Mitigation: Almost Certain With Mitigation: Rare	Unlikely
Degree to which the impact may cause irreplaceable loss of resources:	Without Mitigation: Medium With Mitigation: Medium	Medium
Degree to which the impact can be reversed:	Without Mitigation: Medium With Mitigation: Medium	Medium
Indirect impacts:	-	-
Cumulative impact prior to mitigation:	-	-
Significance rating of impact prior to mitigation (e.g., Low, Medium, Medium-High, High, or Very-High)	Minor Negative	Negligible Negative
Degree to which the impact can be avoided:	-	-
Degree to which the impact can be managed:	-	-
Degree to which the impact can be mitigated:	-	-
Proposed mitigation:	<ul style="list-style-type: none"> <li>All new staff must be briefed about the layout of the construction site and must be made aware of the no-go areas and fact that the surrounding environment is sensitive and must not be disturbed.</li> <li>Construction vehicles should be checked on a daily basis at the start of the day for leaks and other faults.</li> <li>Sandbags or sawdust should be available on the site to ensure that any accidental oil or toxic</li> </ul>	-

	<p>material spills can be contained and stopped quickly.</p> <ul style="list-style-type: none"><li>• Any contaminated soil on the site must be removed by a registered hazardous waste service provider (Spill Tech, Interwaste, EnviroServ etc.).</li><li>• Vehicles with leaks and other problems must not be allowed to operate on the site until they have been repaired.</li><li>• Ongoing monitoring and clearing of invasive plants on the site should occur.</li><li>• Materials used during construction must be sourced responsibly to minimise the risk of further introductions of new invasive plants.</li><li>• No waste dumping or burning is to be allowed on the site or in the surrounding environment. All material waste is to be collected in designated bins and must be transported to a registered waste disposal facility.</li><li>• Adequate ablution facilities must be provided for every construction project.</li><li>• Should portable toilets be used, these must be placed on a level platform before construction starts and they must be placed away from any potential fynbos habitat on the site.</li><li>• Ablution facilities must be regularly maintained and cleaned.</li><li>• At least one toilet per ten to fifteen construction staff should be available.</li><li>• Concrete, cement, plastering, and painting: Mixing areas be properly defined on the site and must be bunded or surrounded by an impermeable material to prevent any runoff into the surrounding environment.</li></ul>	
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	<ul style="list-style-type: none"> <li>• The designated mixing areas should be limited to areas that will become future hard surfaces on the site, or that are already transformed and likely to remain transformed.</li> <li>• No concrete and cement mixing is allowed in areas outside of the PAOI. The 2m disturbance envelope should preferably also be avoided for this activity on the site.</li> <li>• Cleaning of cement, plastering &amp; paint equipment must be done into a designated, bunded &amp; lined slurry sump or container to avoid contaminating the environment.</li> <li>• Stockpiles and soil must all be covered by a geotextile or plastic covering, which must also be bunded (e.g., sandbags) when the piles are not in use on the site. This will prevent the material from washing away and contaminating the substrate of the site which likely still contains useful seeds and soil organisms.</li> </ul>	
Residual impacts:	-	-
Cumulative impact post mitigation:	-	-
Significance rating of impact after mitigation (e.g., Low, Medium, Medium-High, High, or Very-High)	Negligible Negative	-
<b>Operational Phase</b>		

<p>Potential impact and risk:</p>	<p><b>A slow loss of thicket habitat, protected tree species, and plant species biodiversity due to maintenance activities required to maintain the RE/2841 (e.g., vegetation trimming, path and road maintenance, ongoing management of invasive plants, etc.).</b></p>	
<p>Nature of impact:</p>	<p>The proposed development will result in an altered landscape which would produce negative edge effects that impact upon the natural Hartenbos Dune Thicket habitat. Protected tree species (Milkwood and Cheesewood trees), and some potentially occurring SCC will be affected by the management of the land.</p>	
<p>Extent and duration of impact:</p>	<p>Without Mitigation: Extent – Limited; Duration – Ongoing With Mitigation : Extent – Very Limited; Duration – Medium Term</p>	<p>Extent – Very Limited; Duration - Immediate</p>
<p>Consequence of impact or risk:</p>	<p>A general loss of habitat for plants, pollinators, and other important taxa. Altered soil characteristics which causes unnecessary harm to thicket / forest vegetation dynamics. Pollution of the environment. Loss of habitat to invasive plants species. A loss of resilience to disturbance from an increasingly species poor remaining habitat.</p>	
<p>Probability of occurrence:</p>	<p>Without Mitigation: Certain With Mitigation: Almost Certain</p>	<p>Likely</p>
<p>Degree to which the impact may cause irreplaceable loss of resources:</p>	<p>Without Mitigation: Medium With Mitigation: Medium</p>	<p>Medium</p>
<p>Degree to which the impact can be reversed:</p>	<p>Without Mitigation: Medium With Mitigation: Medium</p>	<p>Medium</p>
<p>Indirect impacts:</p>	<p>-</p>	<p>-</p>

Cumulative impact prior to mitigation:	-	-
Significance rating of impact prior to mitigation (e.g., Low, Medium, Medium-High, High, or Very-High)	Moderate Negative	Negligible Negative
Degree to which the impact can be avoided:	-	-
Degree to which the impact can be managed:	-	-
Degree to which the impact can be mitigated:	-	-
Proposed mitigation:	<ul style="list-style-type: none"> <li>• Alien clearing and monitoring according to an alien eradication plan be followed.</li> <li>• Emergency &amp; cleaning supplies for incidents of waste spillage, or accidental fires should be kept nearby (e.g., keep lime, spades, first aid etc. handy). Fire extinguishers etc. must be kept on the camp as per fire safety regulations.</li> <li>• Staff on the site must be properly trained and guests must be well aware of activities that are not allowed on the site.</li> <li>• No staff member is allowed to dispose of grey water in the environment.</li> <li>• No member of staff or guest are allowed to walk where a path is not clearly labelled or outside of roads and boardwalks.</li> <li>• Instructions for the proper use of chemical toilets must be provided and must be clearly visible in all restrooms.</li> <li>• Kikuyu (Cenchrus clandestinus) grass must be avoided on the site.</li> </ul>	-

	<ul style="list-style-type: none"> <li>Plants naturally found in Hartenbos Dune Thicket may be used in gardening / reestablishing natural thicket vegetation following alien clearing efforts.</li> <li>Information plaques could be made for some of the tree species on the site with interesting information about each species.</li> </ul>	
Residual impacts:	-	-
Cumulative impact post mitigation:	-	-
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Minor Negative	-
<b>Potential impact and risk:</b>	<b>Protected trees on the site negatively affected by inappropriate landscaping resulting in genetic pollution, and potential long-term biodiversity loss from the cultivation of species that are not indigenous to the vegetation type and surrounding landscape.</b>	
Nature of impact:	Most landowners plant gardens with plants that are not native and indigenous to the area where they live, as briefly mentioned in the previous impact. The creation of Frankenflora means that genetic pollution could result in cryptic hybridisation and eventual species loss. By allowing the planting of gardens in sensitive natural habitat (even with species advertised as being locally sourced), a loss of plant species diversity could result on the site.	
Extent and duration of impact:	Without Mitigation: Extent – Local; Duration – Ongoing With Mitigation : Extent – Limited; Duration – Short Term	Extent – Very Limited; Duration - Immediate
Consequence of impact or risk:	A gradual increase in the number of negative edge effects that result from exotic garden plants outcompeting natural species in the environment.  Biodiversity loss from introduction & establishment of invasive plants in natural fynbos vegetation	

	<p>Eventual loss of any remaining native vegetation remaining due to the gradual naturalisation of exotic garden plant varieties.</p> <p>Loss of specific adaptations that make plant species resilient.</p> <p>Altered soil characteristics, including soil microbes, &amp; seed bank changes.</p>	
Probability of occurrence:	<p>Without Mitigation: Certain</p> <p>With Mitigation: Certain</p>	Likely
Degree to which the impact may cause irreplaceable loss of resources:	<p>Without Mitigation: Medium</p> <p>With Mitigation: Medium</p>	Medium
Degree to which the impact can be reversed:	<p>Without Mitigation: Medium</p> <p>With Mitigation: Medium</p>	Medium
Indirect impacts:	-	-
Cumulative impact prior to mitigation:	-	-
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Moderate Negative	Negligible Negative
Degree to which the impact can be avoided:	-	-
Degree to which the impact can be managed:	-	-
Degree to which the impact can be mitigated:	-	-
Proposed mitigation:	<ul style="list-style-type: none"> <li>Rehabilitation of thicket should be prioritised above gardening. Lawns must be limited.</li> <li>Landowners are responsible to maintain their gardens, so that plants do not overgrow. No garden waste may be dumped in any remaining</li> </ul>	-

	<p>natural area and must be disposed of in a responsible manner.</p> <ul style="list-style-type: none"> <li>Fertilisers and pesticides must be avoided, and when used it must be done with caution and may not become routine practice.</li> </ul>	
Residual impacts:	-	-
Cumulative impact post mitigation:	-	-
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Minor Negative	-
<b>Visual Impact Assessment</b>		
<b>Alternative:</b>	<b>Alternative 1 (Preferred)</b>	
<b>Construction Phase</b>		
<b>Potential impact and risk:</b>	<p style="text-align: center;"><b>Loss of landscape character from construction and development</b></p> <ul style="list-style-type: none"> <li>Loss of site landscape character due to the removal of vegetation and the construction of the project infrastructure.</li> <li>Construction and laydown camps on the site.</li> <li>The movement of large earth moving and building equipment.</li> <li>Wind-blown dust due to the removal of large areas of vegetation.</li> <li>Wind-blown litter from the laydown and construction sites.</li> <li>Movement of larger vehicles along R102 and Fynbos Road.</li> </ul>	
Nature of impact:	Without Mitigation – Negative With Mitigation - Negative	

Extent and duration of impact:	Without Mitigation: Extent – Local; Duration – Short-term With Mitigation: Extent – Local; Duration – Short-term
Consequence of impact or risk:	Without Mitigation - The construction of the development will be strongly perceived from the R102 Road receptors. With Mitigation - With mitigation, the construction of the development will be perceived from the R102 Road receptors.
Probability of occurrence:	Without Mitigation – Sure With Mitigation - Sure
Degree to which the impact may cause irreplaceable loss of resources:	-
Degree to which the impact can be reversed:	Without Mitigation – Low With Mitigation - Low
Indirect impacts:	-
Cumulative impact prior to mitigation:	Without Mitigation: Medium-Ve - Without mitigation, there is some potential for setting a negative precedent for intensive development along the R102 Road and degrading the tourist views along Fynbos Road With Mitigation: Low-Ve - With mitigation, it is unlikely that the short-term landscape degradation will result in local landscape degradation.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium to High – Ve - During construction without mitigation, there is potential that the retained vegetation will be damaged or destroyed. Dust could become a nuisance factor and the construction site/ laydown area can be visually intrusive
Degree to which the impact can be avoided:	-
Degree to which the impact can be managed:	-
Degree to which the impact can be mitigated:	Low - The mitigation will partially reduce the significance of the visual and landscape impacts.

Proposed mitigation:	<ul style="list-style-type: none"> <li>• Landscaping plan.</li> <li>• Protection of remaining trees and vegetation.</li> <li>• High Visual Exposure road No-go setback buffers from property boundary (10m from R102, 5m from Fynbos Road).</li> <li>• Dust management.</li> <li>• Setback of the laydown area.</li> </ul>
Residual impacts:	-
Cumulative impact post mitigation:	-
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – Ve - With mitigation, the natural vegetation will be protected, dust will be managed, and the layout will set back from the road and less visually intrusive. The construction will, however, be clearly visible and visually intensive to some degree.
<b>Operational Phase</b>	
<b>Potential impact and risk:</b>	<p style="text-align: center;"><b>Loss of landscape character from operation of the development</b></p> <ul style="list-style-type: none"> <li>• Massing effect in the landscape from a medium-scaled landscape modification.</li> <li>• Increased vehicular movement along the road.</li> </ul>
Nature of impact:	<p style="text-align: center;">Without Mitigation – Negative</p> <p style="text-align: center;">With Mitigation - Positive</p>
Extent and duration of impact:	<p style="text-align: center;">Without Mitigation: Extent – Local; Duration – Permanent</p> <p style="text-align: center;">With Mitigation: Extent – Local; Duration - Permanent</p>
Consequence of impact or risk:	Without Mitigation - The construction of the development will be strongly perceived from the R102 Road receptors.

	With Mitigation - With mitigation, the construction of the development will be perceived from the R102 Road receptors.
Probability of occurrence:	Without Mitigation – Sure With Mitigation - Sure
Degree to which the impact may cause irreplaceable loss of resources:	-
Degree to which the impact can be reversed:	Without Mitigation – Low With Mitigation - Low
Indirect impacts:	-
Cumulative impact prior to mitigation:	Without Mitigation: Medium-Ve - Without mitigation, there is some potential for setting a negative precedent for intensive development along the R102 Road and degrading the gateway views into Fybnos road. The further loss of trees and vegetation will limit the potential for medium-term screening. With Mitigation: Low-Ve - With mitigation, it is unlikely that the long-term landscape degradation will result in local landscape degradation. It is possible that the proposed development will result in an expansion of the development to the west on adjacent property. This would need to be addressed in future planning and future EIAs.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium to High – Ve - Without mitigation, there is potential that the development will be visually dominating and will degrade the R102 Road gateway, setting a negative precedent for intensive development along the road.
Degree to which the impact can be avoided:	-
Degree to which the impact can be managed:	-
Degree to which the impact can be mitigated:	Medium - The mitigation will reduce the significance of the visual and landscape impacts.
Proposed mitigation:	<ul style="list-style-type: none"> <li>• Landscaping consolidation.</li> <li>• Lights at night.</li> </ul>

	<ul style="list-style-type: none"> <li>Establishment of low hedges along the Fynbos Road of the property to reduce visual intrusion of the parked vehicles.</li> <li>Restoration and rehabilitation of the High Visual Exposure road No-go setback buffers from property boundary (10m from R102, 5m from Fynbos Road).</li> </ul>
Residual impacts:	-
Cumulative impact post mitigation:	-
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low +Ve - With mitigation, and further tree and shrub plantings within the road buffers, the area has the potential to become a potential positive asset to the local landscape. The existing nodal development that characterises the area will be repeated and continuous ribbon development along the R102 will be less visually dominant to the road receptors.

## 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.
<p>All impact management measures identified in the specialist studies have been stipulated in Section H) 4.</p> <p><b><u>Terrestrial Biodiversity and Botanical Impact Assessment:</u></b></p> <p>Following site inspection by the botanical specialist it is noted that the “Transformed Recently Cleared Invaded Area” represents the area that was cleared of Australian myrtle in the past. The area is recovering with pioneer plant species, most notable Bietou (<i>Osteospermum moniliferu</i>) with thicket clumps persisting and recovering around the transformed area.</p> <ul style="list-style-type: none"> <li>The proposed development is specifically designed to be located on the “Transformed Recently Cleared Invaded Area”, with limited encroachment into thicket vegetation.</li> </ul> <p>The loss of habitat due to the proposed development will not reduce the ability to meet conservation targets of Hartenbos Dune Thicket.</p> <p>The probability of occurrence of all plant SCC and protected species flagged for the proposed development site were assessed and it was confirmed that there are several species with a high likelihood of occurrence and therefore the Botanical Sensitivity Theme was confirmed to be High, even though <b>none</b> of the listed Species of Conservation Concern were identified on site.</p> <p>Protected tree species identified on site include <i>Pittosporum viridiflorum</i> (Cheesewood) as well as <i>Sideroxylon inerme</i> (White Milkwood).</p> <ul style="list-style-type: none"> <li>A full Protected Tree Species survey was completed and incorporated into the preferred Site Development Plan.</li> <li>Protected tree permits must be obtained prior to any removal/trimming of protected trees/clumps.</li> </ul> <p><b><u>Terrestrial Animal Species Compliance Statement:</u></b></p> <p>The DFFE screening tool report identified four sensitive bird species as well as one invertebrate specie to possibly occur on the proposed development property:</p> <ul style="list-style-type: none"> <li>Aves-Bradypterus sylvaticus: Not observed on site and the preferred habitat for this species is fynbos and not thicket which is present on RE/2841.</li> <li>Aves-Circus ranivorus: Not observed on site. This specie is considered a waterbird. There are no watercourse features present on the proposed development site.</li> <li>Aves-Neotis denhami: Not observed on site. The preferred habitat for this specie is cultivated pastures and open grasslands or savannas.</li> <li>Aves-Polemaetus bellicosus: Not observed on site. This specie nests in tall trees and prefers open farmland with clumps of trees, savanna and semi-desert habitats.</li> <li>Invertebrate-Aneuryphymus montanus: Not observed on site. This specie prefers sclerophyllous fynbos habitat which is not present on RE/2841.</li> </ul> <p>In addition to the five sensitive species identified in the Screening Tool Report, the faunal specialist also assessed likelihood of occurrence of an additional eight (8) faunal species. However, it was concluded that none of the assessed thirteen species were observed on site. All the assessed faunal species have a Low likelihood of occurrence with the exception of the Agulhas Ling-billed Lark (<i>Certhilaude brevirostris</i>) that has a Low-Medium likelihood of occurrence. It is therefore recommended that should any Agulhas Long-billed Lark nests be found or suspected to occur on site, construction should be paused until such time that their presence can be confirmed by a faunal specialist.</p>	

This recommendation is included in the Environmental Management Programme forming part of this Draft Basic Assessment Report.

**Aquatic Biodiversity Compliance Statement:**

According to Cape Farm Mapper the southern portion of the site is mapped to contain an Aquatic ESA (Figure 11). Confluent Environmental was appointed to undertake an Aquatic Features Assessment in 2022 on the subject property in which it was concluded that based on the results of a desktop study and site inspection, it is not possible to confirm that a natural wetland is present as indicated in the NFEPA layer. The findings of the Aquatic Features Assessment is consistent with the revised National Wetland Map 5, which does not indicate a wetland on the proposed development site.

It was therefore confirmed that there are no aquatic sensitivities present on the proposed development site.

**Visual Impact Assessment:**

The findings of the landscape and visual impact assessment undertaken by Visual Resources Management Africa, is that the proposed development alternative will be preferred over the No-Go status quo option due to the following reasons:

- *In terms of regional and local planning fit for landscape and visual related themes, the expected visual/ landscape policy fit of the landscape change is rated High.*
- *Local zone of visual influence with some visual buffering from urban residential receptors to the west of the property.*
- *Continuation of the existing nodal development precedent of clustered development surrounded by conservation worthy nature areas.*
- *No loss of significant landscapes that are being used as visual resources.*
- *Retaining the status quo would result in limited economic benefit to the local area and a continued management plan to ensure that regrowth of the alien trees does not take place.*
- *Medium Negative visual impact significance for short-term construction with mitigation.*
- *Low Positive visual impact significance for long-term operation with mitigation.*

The Visual Impact Assessment recommended that the proposed development should be authorised with mitigation as it is unlikely to result in a significant loss of landscape or visual resources. Mitigation measures stipulated in the VIA will be accommodated in the Environmental Management Plan and this Draft Basic Assessment Report.

Preliminary Environmental Management Plan identified in Visual Impact Assessment and to be included in the Environmental Management Programme of this Draft Basic Assessment Report:

**Planning Phase**

- Appoint a suitably qualified landscape architect to generate a detailed landscaping plan prior to construction phase that addresses the following:
  - Retaining and maintaining existing climax trees and review of final design such that the encroachment onto the trees will not impact the tree growth.
  - Internal landscaping such that further trees can be incorporated into the design to soften the visual intrusion of the structures and enhance the R102 road and Fynbos road gateway views.
  - Design specific requirements and planning for construction phase such that the landscaping requirements are suitably incorporated and managed with clear identification of No-Go zones around the significant vegetation areas to be retained.

- The specific No-go structure development areas need to be planted with indigenous trees and shrubs such that there is some visual screening from the R102 and Fynbos road users (10m from boundary for R102, 5m from boundary for Fynbos Road). While these areas can be incorporated in the erven, the management and plantings of these areas should be incorporated in the Home Owners Association as not suitable for structural development and for planting of screening trees and general landscaping.

### Construction Phase

- Carefully identify and exclude the natural vegetation areas that are to be retained, allowing for these area to be linked into the design phase landscape plan.
- Dust management for moving vehicles and windblown dust.
- Set the laydown back from the roads so that they are not a dominating visual feature on areas that will be developed. Screen with green shade cloth (2m high).
- No construction over the weekend or during the night.
- Other security personal, no overnight accommodation for workers.
- Fencing should be black Thru-View without electrical security on top and maximum height of 2m.

### Operation Phase

- Landscaping consolidation as per the detailed landscaping plan.
- Establishment of low hedges from indigenous shrubs such as *Carissa bispinosa* (pruned 1m height) to reduce visual intrusion of the security fencing, and along the Fynbos road areas.
- Lights at night mitigation to ensure that light spillage does not take place (Refer to Annexure C of the Visual Impact Assessment for generic lighting mitigation).
  - No overhead lighting.
  - Downward or inward facing light such that direct lighting is not visible to the casual observer without compromising security.
- Advertising should be constrained and not be visually dominating.
  - Make use of muted / natural colours with a mid-grey hue.
  - The base of the banner should not be elevated more than 1m off the ground and not be larger than 1m high x 2m wide.
- The colours and textures used in the development should be chosen such as to reduce visual contrast. The walls should be natural colour with a mid-grey hue, and the roofs preferably slate grey/ or similar. White colour on the walls should not be used.

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

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

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

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

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

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

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

- Create temporary employment opportunities during pre-construction and construction phase.

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

There will be mostly temporary impacts associated with the construction phase, namely noise and potentially dust pollution.

The following key mitigation measures are submitted as part of the BAR (refer to the EMPr (Appendix H) for more details):

- Construction activities must be limited to Mondays – Fridays (07:00 – 18:00);
- 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. Therefore, the use of rainwater collection tanks is important at the communal buildings as well as residential erven to provide additional water supply for landscaping and irrigation.
- Rainfall intervals will become less, but downpours may be more severe. Therefore, stormwater management on the site is important to prevent unnecessary erosion and/or flooding. The use of SUDS throughout the development, coupled with rainwater tanks at communal buildings, as well as road and parking design will reduce the chances of erosion caused by stormwater runoff.
- Longer, drying periods will impact on plant growth and keeping landscaped areas presentable requires irrigation/watering. Planting only indigenous, endemic plants in landscaped areas will reduce the need for irrigation and also ensure that landscaped areas are more resilient during periods of drought.

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

There were no conflicting recommendations between the various specialist disciplines.

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 the findings and recommendations have been incorporated into the proposal.

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

1. **Avoid Impacts:**

- Avoid highly sensitive habitat/vegetation identified by specialist studies. Avoidance mitigation has been applied to the preferred alternative.
- Demarcate all protected trees prior to any vegetation clearing/development commencing to ensure that contractors do not cause harm/damage to such sensitive features in the landscape.

<ul style="list-style-type: none"> <li>• Demarcate all No-Go areas prior to the commencement of construction activities.</li> </ul>
<p><b>2. Minimise Impacts:</b></p> <ul style="list-style-type: none"> <li>• Clear RE/2841 of all NEM:BA listed invasive alien vegetation species prior to any site clearing/development to ensure that indigenous vegetation can recover and rehabilitate more easily.</li> <li>• Limit construction activities to specified days and times.</li> <li>• Clear the site in a phase manner to reduce dust pollution.</li> <li>• Only indigenous vegetation permitted in the place of the loss of remaining on-site natural vegetation/habitat.</li> <li>• Appointing an ECO to oversee construction to further minimise the potential for unnecessary direct or indirect impacts during the construction as well as the operational phase of the development.</li> <li>• Implement resource conservation measures as part of the design, construction and operational phases.</li> <li>• Implement Environmental Maintenance and Management Plan under ECO supervision.</li> </ul>
<p><b>3. Rectify</b></p> <ul style="list-style-type: none"> <li>• None necessary.</li> </ul>
<p><b>4. Reduce</b></p> <ul style="list-style-type: none"> <li>• Ensure that an ECO inspects the property regularly during its lifespan to monitor for (A) invasive alien vegetation and (B) encroachment into the remaining natural areas i.e. development creep.</li> </ul>
<p><b>5. Offset</b></p> <ul style="list-style-type: none"> <li>• None necessary.</li> </ul>

## 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"> <li>• From a spatial planning perspective, the development proposal is deemed to be in line with Western Cape SDF, Mossel Bay Municipal SDF and IDP, particularly considering development of vacant land within the urban context.</li> <li>• The development proposal is likely to contribute to positive socio-economic impacts through income generation as part of the residential erven sales, employment opportunities during the construction and operational phases.</li> <li>• The site layout design avoids all highly sensitive areas identified and assessed by specialists.</li> <li>• The development proposal is in character with surrounding developments as a residential development of mixed densities.</li> <li>• Services are available through existing municipal supply.</li> <li>• All specialist findings and mitigation measures have been considered and incorporated into the preferred alternative.</li> <li>• Operational specifications for the conservation area is reasonable and feasible and with ensure recreational benefit for future residents, as well as ensure that an overall conservation outcome can be achieved.</li> <li>• The significance of all impacts have been assessed to be of moderate to low significance prior to mitigation and low to negligible with mitigation.</li> </ul>
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)

1.3.	Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.																
	<table border="1"> <thead> <tr> <th>Positive</th> <th>Negative</th> </tr> </thead> <tbody> <tr> <td>Optimising vacant land in an urban context.</td> <td>Temporary noise, dust and safety impacts associated with the movement of heavy vehicles.</td> </tr> <tr> <td>Temporary employment opportunities during construction ( semi-skilled and un-skilled workers mostly).</td> <td>Loss of transformed/recovering vegetation and habitat albeit regarded as already disturbed with Low sensitivity.</td> </tr> <tr> <td>Temporary and permanent employment opportunities during the operational phase ( skilled and semi-skilled workers mostly).</td> <td>Temporary risk of increased crime during construction.</td> </tr> <tr> <td>Support for local economic development.</td> <td>Temporary increase in construction vehicle traffic in the R102 and Souwesia Avenue.</td> </tr> <tr> <td>Creation of business opportunities for locals.</td> <td>Continued maintenance cost (alien clearing, access control, clearing of dumped materials).</td> </tr> <tr> <td>Areas of highest biodiversity value on the preferred site will be retained.</td> <td>Additional pressure on non-renewable services.</td> </tr> <tr> <td>Invasive alien species will be continuously managed.</td> <td>Increased operational traffic during peak periods.</td> </tr> </tbody> </table>	Positive	Negative	Optimising vacant land in an urban context.	Temporary noise, dust and safety impacts associated with the movement of heavy vehicles.	Temporary employment opportunities during construction ( semi-skilled and un-skilled workers mostly).	Loss of transformed/recovering vegetation and habitat albeit regarded as already disturbed with Low sensitivity.	Temporary and permanent employment opportunities during the operational phase ( skilled and semi-skilled workers mostly).	Temporary risk of increased crime during construction.	Support for local economic development.	Temporary increase in construction vehicle traffic in the R102 and Souwesia Avenue.	Creation of business opportunities for locals.	Continued maintenance cost (alien clearing, access control, clearing of dumped materials).	Areas of highest biodiversity value on the preferred site will be retained.	Additional pressure on non-renewable services.	Invasive alien species will be continuously managed.	Increased operational traffic during peak periods.
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## 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"> <li>• Pre-construction clearing must be done with joint input from the ECO as well as a Botanist to ensure that new germinated protected tree/plant species, or trees that have grown in size between the date of EA and implementation, are identified.</li> <li>• Ensure that the study site is cleared of all NEMBA listed invasive alien vegetation prior to any occupation of any units to help remnant indigenous habitat restore and rehabilitate.</li> <li>• Rezoning all of the remaining natural areas to an appropriate Conservation Zoning to prohibit unwanted development creep or encroachment into remaining natural areas.</li> <li>• Implement and adhere to an approved Environmental Management Programme.</li> <li>• Implement and adhere to ongoing invasive alien management during construction as well as operational phases.</li> <li>• Apply for Forestry Permits if any trimming/roots/removal may be required during construction or operational phases (layout plans avoid the on-site protected trees).</li> <li>• All landscaping must be indigenous vegetation in replacement of the loss of vegetation/habitat.</li> <li>• Restrict working times and hours to minimise noise/dust pollution.</li> <li>• Employ minimum 50% local labour.</li> <li>• Source minimum 50% construction materials locally.</li> <li>• Resource conservation measures must be implemented.</li> </ul>

	<ul style="list-style-type: none"> <li>• ECO must be appointed for the duration of the construction phase to (A) monitor invasive alien vegetation and (B) encroachment into the remaining natural areas and (B) ECO must evaluate house plans and landscaping plans to ensure no encroachment into no-go areas as well as to prevent unwanted invasive species in the landscaping.</li> <li>• Annual audits must be undertaken to verify that the conservation area is in fact managed and maintained as a conservation area with the necessary care taken to protect and conserve this sensitive area into the operational phase.</li> </ul>
2.2.	Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.
Please refer to Section J) 2.1, 2.3, 3, 4 and 5 below.	
2.3.	Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.
<p>It is the EAPS professional opinion that the proposed activity can be considered for environmental authorisation (subject to the outcome of the public participation process, compliance with all other relevant legislation and implementation of all management measures and mitigations outlined in the EMPr) for the following reasons:</p> <ul style="list-style-type: none"> <li>• The vegetation where the development is proposed is not deemed sensitive.</li> <li>• The proposed development avoids all sensitive habitat/vegetation as identified by the participating specialists and is not likely to result in an unacceptable environmental loss;</li> <li>• The loss of approximately 2.18ha of vegetation within the proposed property is deemed acceptable on condition that the prescribed pre-construction, construction and operational conditions are adhered to.</li> </ul> <p>It is recommended that the following conditions form part of the Environmental Authorisation for the proposed development.</p> <p><b><u>PRE-CONSTRUCTION:</u></b></p> <ul style="list-style-type: none"> <li>• Development may not proceed until such time as all relevant approvals / licences / permits in terms of other legislation are obtained.</li> <li>• An independent ECO must be appointed prior to commencement of construction to oversee site preparation, vegetation removal and construction.</li> <li>• Permits in terms of the National Forest Act must be obtained prior to removal/trimming/cutting of any protected trees on the property.</li> <li>• Pre-construction clearing must be done with joint input from the ECO as well as a Botanist to ensure that new germinated protected tree/plant species, or trees that have grown in size between the date of EA and implementation, are identified for the purposes of applications in terms of the National Forest Act.</li> <li>• All NEMA listed invasive alien vegetation must be removed from the site prior to development commencing – ECO to verify.</li> <li>• ECO to demarcate all protected trees within the development footprint area prior to any site clearing or development activities commencing.</li> <li>• License(s) in terms of the National Forest Act must be obtained for any trimming or removal of protected trees prior to trimming or removal of any protected trees.</li> </ul> <p><b><u>CONSTRUCTION:</u></b></p> <ul style="list-style-type: none"> <li>• ECO must be appointed for the duration of the construction phase (and must remain employed until the completion of rehabilitation activities) and must inspect site activities on a regular basis to ensure compliance with the EA and EMP;</li> <li>• ECO must evaluate house plans and landscaping plans of individual erven to ensure no encroachment and the correct use of plants in gardens.</li> </ul>	

- Clearing of vegetation must be undertaken in a phased approach to avoid large open areas that will be undeveloped for periods of time and that could result in dust pollution and erosion. This approach would also allow animals to relocate from the construction areas.;
- The EMPr must be included in all contractual documentation and fully implemented and adhered to.

**OPERATIONAL:**

- ECO must be appointed to conduct regular site inspections to (A) monitor invasive alien species and (B) any encroachment into the remaining natural areas beyond the approved development footprint.

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 / building plan approvals and contracts i.e., service level agreements, 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) year validity period for the EA from date of authorisation to commence with construction.

Ten (10) year implementation period from date of commencement to completion of all non-operational aspects of the project (inclusive of construction of individual homes/units).

**3. Water**

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

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

Potable water may not be used for construction activities.

**4. Waste**

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

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

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

**5. Energy Efficiency**

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

Only LED or alternative Low Voltage lights must be used within the development.

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

**SECTION K: DECLARATIONS**

**DECLARATION OF THE APPLICANT**

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

I, Zanthe Seegers....., ID number 8103310135086.....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:
  - o meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - o 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 –
  - o costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
  - o costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - o Legitimate costs in respect of specialist(s) reviews; and
  - o 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:

5/9/2024  
Date:

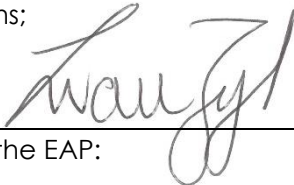
Seebau Woningen  
Name of company (if applicable):

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

I .....Louise-Mari van Zyl....., EAP Registration number .....2019/1444..... 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;

Signature of the EAP:



6 September 2024

Date:

Cape Environmental Assessment Practitioners (Pty) Ltd

Name of company (if applicable):

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

I .....Francois Byleveld....., EAP Registration number .....2023/6770..... as the assisting candidate 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;

*F Byleveld*

**06 September 2024**

Signature of the Assisting Candidate EAP:

Date:

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

## DECLARATION OF THE SPECIALIST

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

I **...Bianke Fouche...**, as the appointed Terrestrial Biodiversity and Botanical Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

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

Signature:



Date:

26 August 2024

**Confluent Environmental**

Name of company (if applicable):

## DECLARATION OF THE SPECIALIST

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

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

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

Signature: 

26 August 2024

Date:

### **Confluent Environmental**

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 Faunal Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, 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.



27/08/2024

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Signature:

Date:

### **Confluent Environmental**

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Name of company (if applicable):

## DECLARATION OF THE SPECIALIST

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

I **...Stephen Stead...**, as the appointed Visual Impact Assessment 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.

*Stephen Stead*  
Signature:

27 August 2024  
Date:

**Visual Resource Management Africa cc**

Name of company (if applicable):