

RE/2833 GREAT BRAK RIVER – COMMENTS & RESPONSE TABLE

Megan Simons (CapeNature), 07 May 2024

Comment	Response
CapeNature would like to thank you for the opportunity to review the above report. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application. CapeNature wishes to make the following comments:	Noted.
According to the Western Cape Biodiversity Spatial Plan (Pool-Stanvliet et.al. 2017) ¹ the property Critical Biodiversity Areas (CBA 1: Forest and Terrestrial) and degraded Ecological Support Areas (ESA 2: Restore). A drainage line flows through the property and to the south.	<p>Noted.</p> <p>According to the Botanist, the CBA Forest in the south-eastern part of the site is incorrectly mapped. That particular area is disturbed and consists of low to medium sensitive roadside bushes and secondary fynbos.</p> <p>The observed primary vegetation type is valley thicket.</p> <p>The mapped drainage line was inspected by an aquatic specialist who confirmed that it is not a natural water course. It does however still serve a purpose from a hydrological perspective and as such has been incorporated into the no-development open space area of the preferred development alternative.</p>
According to Vlok and de Villiers (2007) ² fine scale vegetation maps the area is described as Brandwag Fynbos- Renoster- Thicket and Hartenbos Strandveld. According to the National Biodiversity Assessment (Skowno et al. 2018) ³ the vegetation is Hartenbos Dune Thicket which is Endangered (NEM:BA, 2022) ⁴ . The WC BSP mapped Western Cape Milkwood Forests (EN (C)).	<p>Noted.</p> <p>According to the Botanist, the highly sensitive thicket is representative of Hartenbos Dune Strandveld (thicket). The fynbos on site is mapped by the Botanist as Senescent Erica Peltata dominated fynbos and secondary fynbos (somewhat invaded with Black Wattle).</p> <p>The botanist is of the opinion that the remaining natural vegetation is not representative of coastal forest.</p>
Following a review of the dBAR and specialist studies, CapeNature wishes to make the following comments:	
<p>1. The Hartenbos Dune Thicket is part of the Albany Thicket Bioregion and is endemic to South Africa. This is a poorly protected ecosystem with 79% of its natural extent remaining. In general the Hartenbos Dune Thicket has not been critically assessed to determine the risks and pressures for this vegetation unit and data on the ecosystems condition (including biotic disturbances, overutilization, and altered fire regimes) is limited (SANBI 2022)⁵.</p>	<p>The highly sensitive valley-thicket on site is representative of Hartenbos Dune Thicket. This valley-thicket is not within the development footprint of the proposed development and will be zoned as Open Space II to be excluded from development. This area will be actively maintained through ongoing alien vegetation removal.</p> <p>According to the Botanist, the indirect impact on Hartenbos Dune Thicket can be mitigated from moderate to minor should the following mitigation measures be implemented:</p>

	<ol style="list-style-type: none"> 1. Staff must be informed about the sensitivity of the remaining natural area on the site. 2. Ongoing monitoring and clearing of invasive plants during the construction phase. 3. No kikuyu grass will be allowed anywhere on site. 4. Development must be outside the sensitive valley-thicket. 5. No-Go natural areas must be clearly communicated for the purposes of the construction phase. 6. Materials used during the construction phase must be source responsibly. <p>All mitigation measures recommended by the Botanist are included in the Final EMPr.</p>
<p>2. The applicant is also reminded to ensure the proposed development is guided by the Western Cape Biodiversity Spatial Plan (Pool-Stanvliet et al. 2017). The property forms part of a continuous CBA corridor which is important for the conservation of the species, ecosystems, supporting ecological processes, and landscape connectivity. CapeNature will not support the loss of CBA.</p>	<p>Noted.</p> <p>According to the WC-BSP, majority of RE/2833 falls within a CBA1 for the following reasons:</p> <ol style="list-style-type: none"> 1. Bontebok Extended Distribution Range <i>Not observed on site.</i> 2. Water Source Projection & Watercourse Protection <i>Dr Dabrowski confirmed that the non-perennial drainage line traversing the property is not a formal watercourse.</i> 3. Western Cape Milkwood Forests <i>According to the Botanist, the CBA forest in the south-western corner of the site is incorrectly mapped. The vegetation on site is not representative of Coastal Forest. No milkwood trees were found on site. Only one Cheesewood tree were observed though outside the development footprint.</i> <p>According to the Botanist, the valley-ticket is the only portion of the property with a high environmental sensitivity as it has the potential to support SCC (although not observed on site) and protected tree species. This area is not within the development footprint of the proposed development and will be zoned as Open Space II. This area will be maintained through ongoing alien vegetation removal.</p>
<p>3. CapeNature does not recommend development on steep slopes, and we do not support any development on slopes with a gradient that is greater than 1:4.</p>	<p>According to the gradient analysis as provided by Jan Vrolik (Town Planner), the proposed erven are not steeper than 1:4 and the internal roads are not steeper than 1:5.</p>
<p>4. The specialist mentioned in the Botanical and Terrestrial report that the CBA in the south-eastern section of the site is mapped incorrectly. If the reasons</p>	<p>Noted.</p>

<p>behind CBA delineation is not present on site, then we kindly ask the specialist to complete a WC BSP verification (see attached).</p>	<p>The form has been sent to the specialist to complete.</p>
<p>5. The thicket/ drainage area has high sensitivity from all the specialist studies. This area must be mapped as a No-Go Area.</p>	<p>The highly sensitive valley-thicket will be a no-go area during construction.</p> <p>One (1) circular trail is allowed within the valley-thicket for all potential landowners. All landowners will be restricted to the trail and will not be allowed to wonder off. This path will also act as of access to the valley-thicket for the HOA to continue with the clearance of alien vegetation. As requested by the fauna specialist, the proposed trail will follow areas already disturbed through the removal of alien vegetation.</p>
<p>6. The freshwater specialist mentioned the non-perennial river has an important hydrological function and an aquatic buffer of 30 m on each side was recommended. Furthermore, given the steep slope erosion control measures must be strictly implemented. The Aquatic Biodiversity Compliance statement concluded that the sensitivity is low due to no watercourses being observed however a 30m aquatic buffer (on both sides) is proposed for the hydrological line due to its important function, should the sensitivity not be higher?</p>	<p>According to Dr Dabrowski, while no formal watercourse is present on the property, intermitted flows are likely to occur along the valley-bottom given the topography of the site. Therefore, the valley-bottom does serve a hydrological function in terms of the management of stormwater. According to Dr Dabrowski, it is important to avoid this area including the 30m buffer as this area is potentially vulnerable to stormwater impacts.</p> <p>Although this area is important when it comes to the management of high volumes of stormwater, it has a low Aquatic Biodiversity sensitivity for the following reasons:</p> <ol style="list-style-type: none"> 1. No discernible bed and banks were observed along the valley-bottom indicating that water does not regularly flow through the valley. When water does flow, it is not sufficient to form bed and banks and any associated permanent or temporary aquatic habitat. 2. The lack of hydrophilic plant species, together with the lack of any seasonal, temporary or permanent soil saturation indicators shows that water does not tend to stand or accumulate along the valley-bottom. <p>Dr Dabrowski provided stormwater and erosion management guidelines which were included in the Final EMPr.</p>
<p>7. The faunal specialists found the <i>Bradypterus sylvaticus</i> (Knysna warbler) has a high likelihood of occurring at the site. <i>Bradypterus sylvaticus</i> is threatened and the species is dependent on dense riparian vegetation (Pryke et al. 2011)⁶. Furthermore, it is a decreasing species which is severely threatened by development especially when vegetation is cleared. <i>Bradypterus sylvaticus</i> was found within the drainage line, which according to the Aquatic Biodiversity Compliance report is a highly sensitive area. Would the 30 m buffer on each side of the drainage line be sufficient for the protection of <i>B. sylvaticus</i>?</p>	<p>The Fauna Specialist (Willem Matthee) confirmed that the 30m buffer is sufficient to protect <i>B. sylvaticus</i>. At Tergniet, there is a population of <i>B. sylvaticus</i> in a strip of thicket vegetation between the houses (i.e., a buffer of 5m). Of course, those warblers probably moved in after the construction of the houses was done, but a house is currently being built right next to the vegetation, and the warblers are still present. In other words, as long as the thicket vegetation is kept intact, the thicket warblers are likely to remain in the area. In Stilbaai, there is also a population of <i>B. sylvaticus</i> in a built-up area. They largely keep in the thicket vegetation, so will be minimally (if at all) affected by the development, provided the thicket is maintained.</p> <p>Bianke Fouche (Botanist) delineated the highly sensitive valley-thicket, and this entire area are excluded from the development footprint, not just the 30m buffer area (which is actually included within the greater open space area).</p>

<p>8. The faunal specialist found suitable habitat (i.e., <i>Selago corymbosa</i> a potential larval host plant) for <i>Lepidochrysops littoralis</i> which is Endangered. A Lepidopterist must confirm whether <i>L. littoralis</i> is present and if so, assess the impact of the proposed development on the species.</p>	<p>According to the Faunal Specialist, although <i>Selago corymbosa</i> (host plant for <i>L.littoralis</i>) is present on the property, their presence is very unlikely as this species is only found in areas containing limestone which was not found on the site or anywhere near the site.</p> <p>These species occur west of Mossel Bay, but they are restricted to an area consisting of mainly proteas, which were also not found on RE/2833. The specialist updated his report to clearly state their it is very unlikely that these species is present on the property.</p>
<p>9. The eradication and monitoring of the spread of invasive alien species should follow the National Environmental Management: Biodiversity Act (Act No.10 of 2004)7. Caution should be applied to the drainage area due to the likely occurrence of <i>B. sylvaticus</i> and the ECO must be present.</p>	<p>Noted.</p> <p>The Final EMPr includes a detailed Alien Management Plan for RE/2833.</p> <p>An ECO will be appointed during Site Clearance, Construction and Operational phases.</p>
<p>10. The mitigation measures from the specialists must be strictly implemented. The ECO should inspect the site during the breeding season of <i>B.sylvaticus</i> to ensure no construction occurs.</p>	<p>Noted.</p> <p>These mitigation measures are included in the Final EMPr.</p> <p>The ECO & Faunal Specialist will inspect the site during the breeding season of <i>B.sylvaticus</i> (end-Aug until early-December). However, considering time & financial constraints, it would be difficult to implement the mitigation measure of no construction during the breeding season. The appointed ECO will ensure that the erf is sufficiently demarcated to ensure that no machine/staff will be able to enter the valley-thicket during construction.</p> <p>Furthermore, the contractor must also comply with the Final EMPr which provides certain Management Actions to avoid noise & vibration impacts including:</p> <ol style="list-style-type: none"> 1. Fit and maintain appropriate mufflers on earth-moving and other vehicles on-site. 2. Enclose noisy equipment such as generators and pumps. 3. Provide noise attenuation screens, where appropriate.
<p>11. It was mentioned that trails might be constructed though this can beneficial (i.e., residents can learn, value, and respect nature) this must be assessed to determine if it would have any impact on the highly sensitive ecological corridor.</p>	<p>The impact of trails within the highly sensitive thicket is included in the Botanical & Biodiversity Impact Assessment (2024). The Botanist also provided a list of mitigation measures to avoid any potential impacts.</p> <p>It is important that invasive alien clearing of the remaining natural valley thicket in the designated open space areas commence at the same time as bulk earth works and installation of services to ensure that either a botanist/ECO can give input to the final routing of the footpath within the valley thicket for operational phases.</p>

	<p>No pets may be permitted within this area without being leashed under control of their owners.</p> <p>It is advisable that the development not allow pets, however should pets be allowed they must be contained on erven.</p>
<p>12. The ECO must monitor the construction and operational phases and ensure the recommended mitigation measures of the specialists are implemented. The ECO must ensure that heavy machinery remain outside the drainage line and its buffer.</p>	<p>Noted and included in the Final EMPr.</p>
<p>13. CapeNature reminds the applicant of Section 28 of National Environmental Management Act (NEMA) (Act 104 of 1998 as amended) (Duty of Care) that states the following:</p> <p>“Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.”</p>	<p>Noted and included in the Final EMPr.</p>
<p>Melanie Koen (DFFE), 04 May 2024</p>	
Comments	Response
<p>1. Forestry is responsible for the implementation and the enforcement of the National Forest Act (NFA), Act 84 of 1998 as amended and the National Veld and Forest Fire Act, Act 101 of 1998 as amended (NVFFA).</p> <p>2. Section 15 of the National Forest Act (NFA) (Act No. 84 of 1998) as amended prohibits the cutting, disturbing, damaging or destroying of protected tree species without a licence. Section 7 of the National Forest Act (NFA), act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a license. Under Section 7 of the NFA the whole forest ecosystem is protected and not just the indigenous/protected trees within the forest. “Forest” is defined in the NFA to include i.a. “a natural forest... and the ecosystems which it makes up”, thereby including all components of the forest, not only the trees.” Under section 62 (1) of the NFA any person who contravenes the prohibition of certain acts in relation to trees in natural forests referred to in Section 7 (1) is guilty of a second category offence. A person who is guilty of a second category offence may</p>	<p>Noted.</p>

<p>be sentenced on a first conviction for that offence to a fine or imprisonment for a period of up to two years, or to both a fine and such imprisonment.</p>	
<p>3. According to the report: “The Site Sensitivity Verification indicate that the property consists of : Senecent Erica peltata dominated fynbos (Medium Sensitivity). Poor condition with serious rooikrans invasion. SCC found in this area (Hermannia lavandulifolia – Vulnerable). This SCC is not common, and entirely absent in the valley, thicket, secondary fynbos and grass dominated field. Disturbed Secondary Fynbos (Medium Sensitivity). Dominated by graminoid. Somewhat invaded (mainly black wattles). Introduced and Invasive Alien Plants. Black wattle dominated thicket (Medium Sensitivity). Black wattle trees (Low sensitivity). Limited potential to support SCC. Thicket (High Sensitivity). Cheesewood trees in thicket. Although not observed on site, there is a high probability that Milkwood trees are also occurring on site. Although not observed on site, the habitat has the potential to support SCC. Grass dominated field & Roadside bush (Low Sensitivity) Contained a lot of invasive kikuyu grass. The roadside bushes do not represent natural thicket vegetation. Limited potential to support SCC.”</p> <p>4. According to the report: “It is the intention of the Applicant to subdivide and rezone the property to accommodate for the following development components: The mitigated SDP entails the following: •12 x Single Residential Zone I erven on ±0.32ha, Each erf will be approximately 266m² in size; 31 x General Residential Zone I erven on ±0.83ha; Each erf will be approximately 268m² in size. This portion will be used for group housing and will have a density of approximately 17 units per hectare. 2 x Transport Zone III erven (Private Road) on ±0.95ha, 8 – 10m in width. 1 x Transport Zone II erf (Public Road) on ± 0.35ha, 1 x Utility Zone on ±0.03ha (Conservancy Tank), The tank will have sufficient capacity to only need to be cleaned once every 7 days. The Conservancy Tank will be 5m x 5m x 3m in size. 3 x Open Space II erven on ±3.56ha. Natural vegetation will be retained, and invasive species removed.”</p>	<p>Noted.</p>
<p>5. Forestry conclude/ request the following:</p> <p>a. Forestry request that should Coastal Forest, protected Milkwood trees, as well as Protected Cheesewood trees occur on the developmental portion of property it should be GPS'd and incorporated within the proposed development design as no-go areas.</p>	<p>According to the independent SACNASP registered botanical specialist, the valley-thicket on site is not representative of Coastal Forest. It is her submission that Coastal Forest have more open understorey which is not the case for the thicket on RE/2833 that is virtually impenetrable.</p> <p>Despite the classification as thicket (and not forest), the highly sensitive valley-thicket has been excluded from the developmental footprint of the property and will remain protected as internal Open Space.</p> <p>The “black wattle invaded thicket” within the developmental portion of the property is also not representative of Coastal Forest for the same reason. According to the</p>

	<p>specialist this area is dominated by large black wattle trees that gives it a lesser sensitivity.</p> <p><u>Protected Milkwood and Cheesewood trees</u></p> <p>The botanical specialist did confirm that the highly sensitive thicket vegetation does contain Cheesewood trees (development avoids this area), and furthermore it is likely that Milkwood trees (although not observed during the field assessment) are also present within the highly sensitive valley-thicket area of the site. Again, this area is avoided and excluded from the development footprint. As such the risk of impacting on such protected trees is unlikely.</p> <p>The botanist did not find any protected tree species within the developmental footprint of the property, as such the Department's concern in this regard is noted and will be implemented.</p> <p>In the event that a protected tree species occurs within a residential erf (especially potential future regrowth before erven are potentially developed years from now) it will be GPS'd as per the Department's request and landowner will be advised to avoid any such trees (unless permitted for trimming/clearing through a Forestry License).</p>
<p>b. Forestry requests a detailed vegetation report on the impacts in order to make informed comment on the proposals- and also to conduct a site inspection to verify the species being affected by the various proposals. As Forestry will determine by itself the conservation status of the vegetation being affected by the various proposals.</p>	<p>The Botanical & Biodiversity Impact Assessment was circulated during the Public Participation Period (11 May 2024 – 15 April 2024) and made available to the Department during the same time.</p> <p>Site inspection arranged (see below comment).</p>
<p>c. Kindly note that this letter is not a NFA licence. Continuing above activity without a valid NFA licence is illegal and a criminal offence under the NFA.</p>	<p>Noted.</p>
<p>6. Forestry reserves the right to revise initial comment based on any additional information that may be received.</p>	<p>Noted.</p>
<p>UPDATE:</p> <p>Melanie Koen, Mariska Byleveld and Bianke Fouche (Botanical/Biodiversity Specialist) had a site meeting on 15 May 2024 to discuss whether Coastal Forest is present on the property. According to Mrs Koen, the site is not representative of Hartenbos Dune Thicket or Coastal Forest, however, the site is transitioning to a Coastal Forest.</p> <p>According to the Botanical/Biodiversity Impact Assessment (2024), the habitat in the valley-thicket is considered part of the Endangered Hartenbos Dune Thicket and is not representative of Coastal Forest. This area has a high Site Ecological Importance and as such is avoided by development.</p> <p>Melanie Koen requested the following to be included in the Final BAR:</p>	

1. Alien Management Plan (the EMPr includes a section on invasive alien vegetation management).
 2. Rehabilitation Plan (According to Mrs Koen, the Applicant must actively rehabilitate the area indicated as thicket to Coastal Forest).
 - It is submitted that the thicket habitat on the site has an ecological threat status of Endangered. To convert this to Forest (which has a Least Concerned threat status) does not contribute to a nett-positive conservation outcome. The area will nonetheless be avoided and with ongoing invasive alien clearing within this area the natural succession will happen passively.
 3. Fire Management Plan
 - The primary vegetation on the property is not a fire driven ecosystem.
- An Alien Management Plan is included in the Final EMPr. An active restoration plan is not included in the EMPr for the following reasons:
- The Botanist is of the opinion that the site is not representative of a Coastal Forest. A Coastal Forest tend to have more open understoreys. The thicket on site did not have an open understorey and therefore it does not make sense to convert this are to coastal forest through a specific programme to transform the vegetation.
 - There are no records that the valley-thicket on site was representative of a Coastal Forest. Only the south-western portion of the property was mapped as CBA forest; however, according to the Botanist that particular area is mapped incorrectly. There are records that the site consisted of EN Hartenbos Dune Strandveld (CapeFarmMapper, Vlok de Villiers (2007) fine scale vegetation maps and the National Biodiversity Assessment).
- All invasive alien vegetation on site will be actively managed and therefore the site will rehabilitate passively back to its original state.

SACAA, 29 April 2024

Comments	Response
<p>We acknowledge receipt of email dated 11 March 2024. The South African Civil Aviation Authority (CAA) is an agency of the Department of Transport (DoT). The Civil Aviation Act 13 of 2009 provides for the establishment of the CAA as a stand-alone authority mandated with controlling, promoting, regulating, supporting, developing, enforcing and continuously improving levels of safety and security throughout the civil aviation industry. The CAA exercises this mandate through the Civil Aviation Regulations (CARs).</p>	<p>Noted.</p>
<p>Please see our comments below:</p> <p>A formal obstacle assessment must be conducted to assess whether the proposed residential development will affect the safety of flights in anyway. The client is required to follow the application procedure and process as published on the SACAA website:https://www.caa.co.za/industry-information/obstacles/.The application must be forwarded to obstacles@caa.co.za together with the following:</p> <ul style="list-style-type: none"> • A kmz/kml (Google Earth) file reflecting the footprint to the proposed development site. • Provide coordinates (deg, min, sec), Height and Elevation. For development, they provide at least four corners and a centre point. 	<p>The 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 only reason for Civil Aviation being highlighted in the Screening Tool is because the site is ~16km on heading 70.19 from George Aerodrome (FAGG George). The development will not trigger the obstacle collision / potential hazard requirements as set out by the CAA, i.e.</p> <ul style="list-style-type: none"> • Buildings or other objects which will constitute an obstruction or potential hazard to aircraft moving in the navigable air space in the vicinity of an aerodrome, or navigation aid, or which will adversely affect the performance of the radio navigation or instrument landing systems,

<ul style="list-style-type: none"> Indicate the height to the highest structure of the project (to the top) 	<ul style="list-style-type: none"> There are no buildings or objects higher than 45 metres above the mean level of the landing area, No building, structure or object that projects above a slope of 1 in 20 and which is within 3000 metres measured from the nearest point on the boundary of an aerodrome, No building, structure or other objects which will project above the approach, transitional or horizontal surfaces of an aerodrome. <p>There are no reasonable grounds to conduct any specialist studies to confirm this.</p>
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Anita du Toit, 29 April 2024

Comments	Response
<p style="text-align: center;">Good day Mariska, With reference to the above.</p> <p>Would you please advise what additional measures will be taken to control the extra stormwater which will result from this project.</p>	<p>Copy of the Services Report from Urban Engineering provided for a more detailed description of Stormwater Management on RE/2833, Great Brak River.</p> <p>In summary, the stormwater generated by the proposed development will be managed by a Sustainable Drainage System (SUDS) approach. SUDS focuses on sustainability by attempting to imitate the natural hydrological cycle.</p> <p>The following stormwater measures will be incorporated in the detailed design of the proposed development:</p> <ul style="list-style-type: none"> Rainwater harvesting tanks will be installed to collect and store water from building roofs. Emergency overflows will be included in the detailed design to allow controlled discharge of water during major storms. Permeable pavements/driveways are recommended to encourage infiltration into the soil (Figure 1). Soakaways will be incorporated in the detailed designs of internal roads / driveways (Figure 1). Swales will also be incorporated in the detailed design of the internal roads. The use of swales will encourage infiltration and reduce the speed, energy and volumes of stormwater runoff.



Figure 1: Example of permeable driveways (left) & soakaways (right).

Excess stormwater will be directed to the existing stormwater channel on the southern boundary of RE/2833. Urban Engineering determined a high-level estimate of the expected stormwater run-off for minor and major storms. Based on Urban Engineering's calculations, the existing stormwater channel has sufficient capacity to accommodate excess stormwater from the development.

You are most welcome to contact either myself or Louise-Mari directly should you have any other queries.

Magda Fivaz, 17 April 2024

Comments

Response

Hiermee ons voorstel aangaande die ontwikkeling te Erf 2833 Sandhoogte pad Groot Brakrivier, da tons geen beswaar het teen die ontwikkeling nie, indien Sandhoogte pad breër gemaak sal word, aangesien Sandhoogte pad alreeds 'n probleem is vir verkeer omdat hy so smal is.

The traffic engineer considered the low level of traffic associated with this development proposal and upgrades of Sandkraal Road is not anticipate or expected by the Roads Authority with such low levels of traffic.

BOCMA, 15 April 2024

Comments

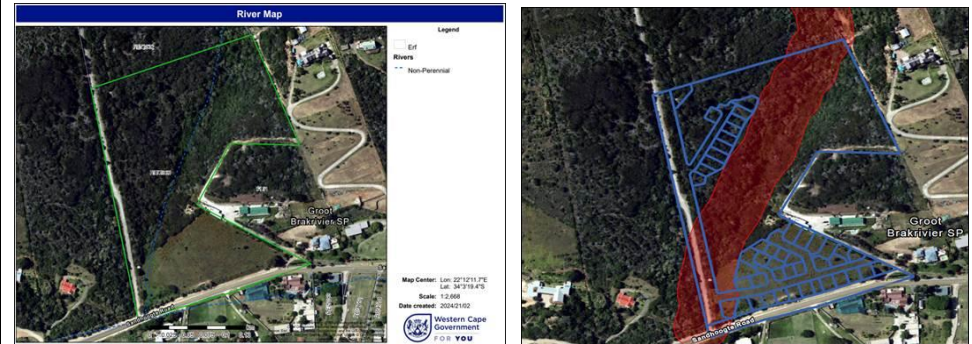
Response

There seems to be an intermittent natural channel that traverses through the application property on the map. Please assess and delineate the extent of the watercourse to identify if the proposed development will trigger water uses in terms of the National Water Act, 1998.

According to the aquatic specialist (Dr Dabrowski from Confluent Environmental), the non-perennial drainage line traversing the property is not a natural watercourse given the lack of defined bed, banks or channel. The water also does not tend to stand or accumulate along this area given the lack of hydrophilic plant species and seasonal, temporary or permanent soil saturation. It is however a low point in the landscape (valley) with natural drainage and therefore serve a hydrological function.

The aquatic specialist delineated the low point and recommended a 30m buffer zone on either side of the lowest point along the valley bottom (please see attached Aquatic

Compliance Statement, 2023). This buffer zone is included in the Mitigated Site Development Plan (please see below):



Please ensure that no water is taken from a water resource for any purpose without authorisation from the Responsible Authority.

Please ensure that no waste or water containing waste is disposed in a manner which may detrimentally impact on a water resource without authorisation from the National Water Act, 1998 (Act 36 of 1998) and other related legislations.

Comments # 2 – 5 are noted and will be adhered to:

- Water will be supplied via the existing Municipal water network.
- All household waste (including grey water) will be captured in the Conservancy Tank that will be emptied, when required, and disposed of at an approved municipal facility.

<p>No pollution of surface water or groundwater resources may occur due to any activity. Stormwater management must be addressed both in terms of flooding, erosion, and pollution potential.</p>	<ul style="list-style-type: none"> Stormwater management is addressed in the Environmental Management Plan.
<p>No stormwater runoff from the application premises containing waste, or water containing waste emanating from any activity may be discharged into a water resource without prior treatment.</p>	

DEA&DP, 15 April 2024

Comments	Response
<p>It is understood that the proposal entails the development of a residential establishment on the Remainder of Erf 2833, Great Brak River, Mossel Bay Local Municipality. The Remainder of Erf 2833 is approximately 6 hectares and is currently zoned Agriculture I. The applicant is proposing to rezone the property from Agriculture I to Subdivisional Area that will include the following Mitigated Site Development Proposal:</p> <ul style="list-style-type: none"> 12 x Single Residential Zone I erven on ±0.32ha, 31 x General Residential Zone I erven on ±0.83ha, 2 x Transport Zone III erven (Private Road) on ±0.95ha, 1 x Transport Zone II erf (Public Road) on ± 0.35ha, 1 x Utility Zone on ±0.03ha (Conservancy Tank) 3 x Open Space II erven on ±3.56ha. 	<p>Please note that following comments received during the Public Participation Period, some internal changes were made to the Mitigated Site Development Proposal SDP:</p> <ul style="list-style-type: none"> The alignment of the internal roads (Geelvinkstraat). <ul style="list-style-type: none"> Mossel Bay Municipality recommended that the alignment of the internal roads change to ensure that the roads are not steeper than 1:5. All Single Residential erven changed to General Residential erven. <ul style="list-style-type: none"> Mossel Bay Municipality recommended changing the residential erven to Group Housing properties. Locality of the Open Space erf along Sandhoogte road. <ul style="list-style-type: none"> Because of internal road alignment adjustments, the Open Space erf along Sandhoogte Road was moved to the west. In order to accommodate stormwater from Kwikstertjiesstraat, another Open Space erf was created adjacent to erf 12. Locality of the conservancy tank. <ul style="list-style-type: none"> The conservancy tank's location, which was formerly next 87/129, was relocated to Erf 5 to internalise its potential impacts. <p>These changes are reflected in the preferred SDP and Final BAR.</p>
<p>It is noted that from the draft BAR that the proposed development will connect to a dedicated on-site conservancy tank, which will be installed on Erf 15. It is further noted from your submission that the Home Owners Association can connect the internal sewer network to the municipal sewer network in the future when the municipal pumping station/sewer line has the necessary capacity at which time the conservancy tank will be converted to a pump station. Please provide more clarity in this regard and also obtain written confirmation from Mossel Bay Municipality as to when there will be sufficient capacity for the anticipated sewage volumes or will there only be capacity after the aforementioned upgrades have been completed?</p>	<p>Please note that following comments received during the Public Participation Period the locality of the conservancy tank was relocated to Erf 5 to internalise the potential impacts.</p> <p>It was envisaged that the reticulation of the development be connected to the existing sewer gravity main once the sewer (pump) line to the WWTW has been upgraded. . It is envisaged that once the problems with the Long Street Pump Station have been resolved, the tank will be converted to a small pump station to pump sewer into the existing municipal gravity line to the 'cricket pump station' via a future connection to the Municipal sewer line (Mossel Bay Municipality accepts this proposal) and from</p>

	<p>there the (then) upgraded municipal sewer pump line will transport sewage back to the WWTW.</p> <p>The environmental process to resolve these issues at the pump station and upgrading of sewer lines is already underway and SkyHigh Consulting Engineers were appointed in March 2024 to do the design. However, the completion of the upgrades is largely dependent on the availability of funding, however it is reasonable to anticipate the necessary approvals (for the upgrades) to be in place within 12 months (i.e. by mid-2025) whereafter the Municipality will be in a position to implement the upgrades, but it will be funding dependent.</p>
<p>According to the Aquatic Compliance statement, the key impact associated with residential developments is the generation of large volumes of stormwater as a result of the increased area of impermeable surfaces. The detailed section on stormwater in the Engineering Services Report is noted, however, please include a stormwater management plan as part of the EMPr in the Final Basic Assessment Report that will give effect to the rational method used to determine the pre- and post-development stormwater run-off volumes, as well as the 60% restriction in terms of surface hardening of the erf's footprint to limit stormwater runoff. It is however noted from the Engineering Services Report that only 20% of the total site footprint will be hardened.</p>	<p>Noted.</p> <p>A Stormwater Management Plan is included in the Final EMPr.</p>
<p>It is acknowledged from the mitigated site development plan (SDP), Figure 25 of draft BAR that most of the erven are located outside the 30m buffer area, but it appears as if one erf, which abuts the Sandhoogte Road in the southern part of the subject property is located within the 30m buffer area, which is contrary to the recommendations made by the aquatic specialist. Please confirm that the 30m buffer area is represented by the area highlighted in red in Figure 25 of the draft BAR, as there is no legend in this figure. Also confirm that the one erf has been excluded from the proposed 30m buffer in the mitigated SDP as per Figure 3 in the draft EMPr.</p>	<p>It is confirmed that the erf in the southern part within the 30m buffer area (Erf 46) is an Open Space II erf. No development will take place on this erf as per the aquatic specialist recommendations.</p> <p>The area highlighted in red in Figure 25 of the Draft BAR does represent the 30m buffer. A legend is added for the Final BAR.</p> <p>According to the Aquatic Specialist, Erf 47 which is the private road crossing the 30m buffer area, will not directly impact any aquatic biodiversity and is considered acceptable. However, this crossing must ensure that periodic flows down the drainage zone can pass through or over the road surface without causing any inundation upstream of the road or erosion downstream of the road. His recommendation is included in the Final EMPr.</p>
<p>Environmental Management Programme: In accordance with Section 24N of NEMA and Regulation 19 of Government Notice (GN No R. 326 as amended 7 April 2017), this Directorate notes the submission of the draft Environmental Management Programme ("EMPr"). Please ensure that the contents of the EMPr meets the requirements as outlined in Section 24N (2) and (3) of the NEMA (as amended) and Appendix 4 of (GN No. 326 as amended 7 April 2017). The EMPr must address the potential environmental impacts of the activity throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing).</p>	<p>Noted.</p>


<p>Please ensure the final Basic Assessment Report (“BAR”) and Environmental Management Programme contain all information requirements outlined in Appendices 1 and 4 respectively of the Environmental Impact Assessment Regulations, 2014 (GN R. 982 of 4 December 2014, as amended).</p>	<p>Noted.</p>
<p>All applications, reports and documents, which include all signatures and Annexures which are included as part of the application and subsequent reports, must be submitted via e-mail to the relevant official, with attached PDF versions of letters and reports. If the documents are too large to attach to an e-mail, the competent authority must be notified per e-mail and provided with an electronic link to such documents that is accessible by the relevant authority.</p> <p>Note: The Directorate: Development Management (Region 3), has created a generic e-mail address to centralise its administration within the component (i.e. notifying clients of decisions and receiving EIA applications, Notice of Intent form; request for fee reference numbers, etc.) Please make use of the new e-mail address too when submitting such documents:</p> <p style="text-align: center;"><i>DEADPEIAAdmin.George@westerncape.gov.za</i></p>	<p>Noted.</p>
<p>Kindly note that this Directorate requires that when the final BAR is submitted, one (1) electronic version of the document must be submitted to the Directorate for consideration. Hard copies of the document are no longer required but must be made available upon request.</p>	<p>Noted.</p>
<p>Please note that the activity may not commence prior to an environmental authorisation being granted by this Directorate.</p>	<p>Noted.</p>
<p>Also note that it is an offence in terms of Section 49A(1)(a) of the NEMA for a person to commence with a listed activity unless the Competent Authority has granted an Environmental Authorisation for undertaking it. Failure to comply with the requirements of Section 24F of the NEMA shall result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.</p>	<p>Noted.</p>
<p>This Department reserves the right to revise or withdraw initial comments or request further information from you based on any new or revised information received.</p>	<p>Noted.</p>

Colin Belter, 14 April 2024

Comments	Response
<p>Regarding the mass sewerage tank, you have now stated an increased capacity and frequency of being emptied. I would like to know how many honeysucker return tips could be expecting on a weekly basis. Regarding the dangerous corner, you have not recognised what I am saying and rather looked at your own development in isolation.</p>	<p>The honeysucker return trips are estimated at about 8 times on a weekly basis at full development capacity. This is only when the proposed development will be fully occupied.</p>
<p>There is more than one reason that I suggested that the road front houses be moved back, it is not only to accommodate any possible municipal road improvement in the future, but also to accommodate bath and clothes wash water from your development. That bluegum at the location of the sewer tank, which I assume that you intend removing, could be recycling hundreds of litres of grey water on a daily basis. By moving the houses back there can also be trees planted between the houses and the road, this is a benefit of a sound barrier for your development and ascetically more pleasing for a wooded Groot Brak. By dedication only sewer water to tank you will decrease the required holding capacity, honeysuckers on the road and quantity to the municipality sewer plant.</p>	<p>Considering the property's environmental and gradient constraints, these erven cannot be moved further away as they would encroach into a highly sensitive and steep area (steeper than 1:4). The position of the erven was based on the gradient analysis as development cannot occur in areas steeper than 1:4. Upon these constraints it was decided to rather focus the development on the flatter sections of the property and to leave the steeper sensitive areas as Open Space given its conservation value.</p>
<p>Another potential solution is to take the money for the construction of a mega sewer tank, plus five-year projected honeysucker running cost, and donate it to the municipality in order to speed up the process of the upgrading of the cricket field pump station. Judging from the layout that you are proposing, I assume that there will be second and third phases. I am asking you to think out of the box and provide a solution that is better for the town.</p>	<p>The options to handle sewer was discussed with the Mossel Bay Municipality. Unfortunately, it will not be feasible to contribute to the Municipal sewer constraints as it has come to light that it is not only the capacity problem at the Cricket Field Pumpstation but also the sewer pipeline that needs to be upgraded. The Conservancy Tank will only be a temporary solution until such time the capacity problems (pumpstation & pipeline) are fixed. I was informed that the Great Brak Sewer Upgrades tender has been awarded to SkyHigh Consulting Engineers in March 2024 who are conducting the necessary investigation and design on behalf of the Municipality to expedite the necessary sewer upgrades.</p> <p>Considering all comments received on the Conservancy Tank, the locality of the Conservancy Tank has been moved from Erf 15 to one of the erven more to the west (Erf 5) to internalise the potential impacts of the Conservancy Tank.</p>

Garden Route District Municipality, 12 April 2024

Comments	Response
Reference of the abovementioned application, the following comments for proposed residential development of Erf 2833, Great Brak River, Mossel Bay (RE/2833 is ± 6ha in size and currently zoned Agriculture):	<p>Potential <u>noise</u> impacts & risks are addressed in the Environmental Management Programme including the following management actions to mitigate these impacts:</p> <ul style="list-style-type: none"> • Fit and maintain appropriate mufflers on earth-moving and other vehicles on the site. • Enclose noisy equipment such as generators and pumps. • Provide noise attenuation screens, where appropriate. • Where an activity is likely to cause a noise nuisance to nearby residents, restrict operating hours to between 7 am and 6 pm weekdays and 7 am to 1 pm Saturday, except where, for practical reasons, the activity is unavoidable.
Put measures in place to minimize the effects of <u>noise</u> to neighbouring residential areas as well as the construction workers.	
Put measures in place to control <u>dust</u> in the area. Health issues e.g. eye irritations, skin conditions and lung infections from emissions due to vehicular activities must be controlled and avoided.	<p>Potential <u>dust</u> impacts & risks are addressed in the Environmental Management Programme including the following management actions to mitigate these impacts:</p> <ul style="list-style-type: none"> • Implement a dust prevention strategy. The strategy should include: <ul style="list-style-type: none"> ○ Speed control to minimise dust on site. ○ During dry, dusty periods haul roads should be kept dampened to prevent excess dust. ○ Exposed stockpile materials must be adequately protected against wind (covered), and should be sited taking into consideration the prevailing wind conditions. ○ Trucks bringing in materials must be covered to prevent dust and small particles escaping and potentially causing damage to people and property.
Sufficient toilet facilities must be placed at appropriate locations for staff ratio one (1) toilet per every fifteen (15) workers.	Noted and included in the Environmental Management Programme.
<u>Waste</u> from the construction site must be contained and removed on a regular basis.	<u>Waste</u> management (construction & operational phases) is also addressed in the Environmental Management Programme.
Water from human consumption must comply with SANS 241 Standards.	Noted.
Regular monitoring by means of inspection and water sampling will be done by an Environmental Health practitioner to ensure compliance from an environmental health perspective.	Noted.

Comments	Response
<p>Ons respekteer die hoeveelheid werk wat alreeds in hierdie voorstel vir ontwikkeling ingegaan het, ek het wel heelwat vrae en bekommernisse agv die ligging van ons kleinhoewe, en het dit probeer opsom / aanspreek soos hieronder.</p> <p>Ons woon op n kleinhoewe om die voordele wat daarmee gepaard gaan te geniet – landlewe, privaatheid, vrede en stilte, gemeenskap, ruimte, uitsigte en nie beperk tot diere wat ons besit nie. Ons lewensgehalte sal onherroepelik verander word as gevolg van <u>stedelike uitbreiding en verdigting</u>.</p>	<ul style="list-style-type: none"> • <u>Stedelike uitbreiding & verdigting</u> <p>Die betrokke eiendom is geïnkorporeer by die sogenaamde ‘stedelike-rand’ van Groot Brak tesame met die eiendomme suid van die voorgestelde ontwikkeling (Figuur 1). RE/2833 is ook aangewys vir stedelike invul-ontwikkeling soos per Mosselbaai se ruimtelike ontwikkelingsraamwerk (2022).</p>  <p>Figure 2: Map showing the locality of RE/2833 and the urban edge (red line).</p> <p>Die eerste goedkeuring wat vir RE/2833 verkry is, was in 2010 (beide omgewingsmagtiging en grondgebruikbeplanningsmagtiging). Hierdie magtiging was geldig tot laat 2017. A.g.v. hierdie goedkeurings het RE/2833 binne die stedelike rand gebly selfs met die jongste 2022 ruimtelike ontwikkelingsraamwerk.</p> <p>Volgens die stadsbeplanner word die voorstel geag in lyn te wees met die ruimtelike beplanningsbeleid en grondgebruikbestuursvisie vir Groot Brak.</p> <p>Soos met alle voorstelle, sal die eienaar (en toekomstige inwoners sou die Owerhede hierdie voorstel vir magtiging oorweeg) bestaande grondgebruike in die gebied moet respekteer en erken (wat deurlopende landbou-aktiwiteite kan insluit). Nuwe ontwikkelings moet nie inbreuk maak op die bestaande en/of primêre regte van ander grondeienaars in die gebied nie, m.a.w moet nie daartoe lei dat ander grondeienaars hul primêre / wetlike regte uitoefen nie.</p> <p>Maar dit is ook belangrik om kennis te neem van die Munisipale By-Wette wat die aanhou van diere in stedelike areas voorskryf in gevalle waar dit moontlik 'n nuisance kan word.</p>

OMGEWINGSIMPAKTE EN VERSAGTINGS BL 8

Negatief:

- Tydelike geraas-, stof- en veiligheidsimpakte wat verband hou met die beweging van swaar voertuie.
- Tydelike risiko om misdaad tydens konstruksie te verhoog.
- Tydelike toename in konstruksie voertuigverkeer.
- Bykomende druk op nie-hernubare dienste.

Agtergrond: Die voorgestelde ontwikkeling val binne 'n landbousone 1-gebied reg oorkant ons kleinhoewe. Die parameterlyn (pale) van die nuwe ontwikkeling is 30m van ons huis en voordeur af. Ons is tans 'n gemeenskap wat uitkyk vir mekaar en mekaar ken. Die voorgestelde ontwikkeling is 'n hoëdigheidsopset. Die ontwikkeling word grootliks omring deur tans steeds landbou eiendomme!

Tydelike en permanent geraas: Ons woning is slegs 9m van ons sypaadjie af. Ons is bekommerd oor nuwe inwoners wat kla oor ons diere. 'n Elektriese heining en hek word voorgestel, dit sal tot gevolg he dat die honde; onself, en nuwe inwoners tydens en na konstruksie aan bykomende geraas en beweging onderwerp word, in so geval blaf die honde voortdurend. Ek het 'n baksteenmuur tussen myself en my naaste buurman laat oprig om geraas te beperk en goeie buurmanskap te bevorder. Ons gaan geraasversteuring ervaar as gevolg van konstruksie en nuwe voltooide huise, veral direk langs Sandhoogtestraat. Konstante geraas veroorsaak gewoonlik wrywing. Privaatheid en veiligheid is ook n knelpunt, die beplande huise is baie naby aan ons woning.

Sal nuwe inwoners toegelaat word om troeteldiere aan te hou? Dit sal ook 'n impak hê op geraasvlakke.

- Is daar enige moontlikheid vir 'n soliede muur / struktuur op die Sandhoogte-parameter om bogenoemde aan te spreek?
- Sal daar van die inheemse bome / struik op Sandhoogte parameter gelos word vir privaatheid?

Die voorgestelde ontwikkeling sal die landboulanskap in ons omgewing onherroeplik verander, aangesien ons dan 'n residensiële sone-1 hoëdigtheid kompleks in die middel van ons (tans nog) landbou-gesoneerde eiendomme en ruimte sal hê.

Wat is die be-oogde konstruksietydperk van baanbreek tot ten volle operasioneel vir 31 nuwe wonings?

- **Tydelike en Permanente Omgewingsimpakte (stof, geraas, potensiële misdaad).**

Die Omgewingsbestuursplan (apart aangeheg) maak voorsiening vir alle tydelike stof, geraas en potensiële misdaad risikos. 'n Omgewingsbestuursbeampte moet aangestel word voor-, tydens en na-konstruksie om te verseker dat die ontwikkeling in lyn is met die Omgewingsbestuursplan.

Ter opsomming:

- **Stof:** Die kontrakteur moet 'n stofvoorkomingstrategie implementeer tydens die beplanningfase van die ontwikkeling. Die strategie sluit gewoonlik die volgende in: (a) spoedbeheer, (b) natmaak van paaie, (c) toemaak van blootgestelde konstruksie materiaal om dit deur die wind te beskerm.
- **Geraas:** Alle konstruksie is beperk tussen 07h00 – 18h00 weksdae en 07h00 – 13h00 Saterdag. Enige ander dae moet vooraf met die ECO uitgeklaar word.
- **Diefstal** en ander misdaad wat met konstruksierreine verband hou, is nie net 'n bekommernis vir omliggende inwoners nie, maar ook die ontwikkelaar en die kontrakteur. In die lig hiervan moet kontrakteurs proaktief wees om diefstal en misdaad op en van die konstruksierrein te verhoed. Dit word aanbeveel dat die kontrakteur 'n werkpleksecuriteitsplan ontwikkel voor die aanvang van konstruksie. Hierdie werkpleksecuriteitsplan moet die beskerming van die konstruksierrein teen beide interne en eksterne kriminele elemente oorweeg, asook die beskerming van omliggende gemeenskappe teen interne kriminele elemente. Alle voorvalle van diefstal of ander misdaad moet by die Suid-Afrikaanse Polisiediens aangemeld word.

Soos alreeds genoem, toekomstige inwoners sal bestaande grondgebruik in die gebied moet respekteer en erken. Toekomstige inwoners moet voldoen aan die toekomstige reëls en regulasies van die ontwikkeling soos omskryf deur die huiseienaarsvereniging.

- **Addisionele vrae:**

Diere: Die kompleks gaan diere-vriendelik wees maar diere moet te alle tye onder die eienaar se beheer wees (bv aan leiband) en mag nie die oopruimte areas betree sonder dat die nodige beheer-maatreëls in plek is nie.

	<p><u>Omheining:</u> Omrede sekere gedeeltes van die eiendom hoë fauna (diere) sensitiwiteit het, moet die ontwikkeling omhein word met 'n diere-vriendelike heining en dus kan daar nie 'n soliede muur / struktuur kom nie.</p> <p><u>Update (telefoniese gesprek met Marinda rakend konstruksietydperk – 13 April 2024):</u></p> <p>Volgens die projekbestuurder is RealNet betrokke by die verkoop van die individuele erwe. Elke erf gaan individueel verkoop word met 'n plot en plan (daar gaan net 3 plan opsies wees). Elke grondeienaar gaan 'n betrokke tydperk kry waarin hy sy huis klaar gebou moet hê. Die projekbestuurder kan nie presies sê hoe lank konstruksietydperk gaan wees nie, want dit hang grootliks af van die mark en of mense belangstel om die erwe te koop. Hy hoop dat konstruksie binne twee jaar afgehandel sal word sou Omgewingsake die voorgestelde ontwikkeling vir Omgewingsmagtiging oorweeg.</p>
<p><u>Serwituut pad:</u></p> <p>Aanbevelings is gemaak in die verkeersimpakstudie vir Tarentaalstraat – die serwituutpad moet verbreed word van huidige 3m tot 6.4m breedte om voorsiening te maak vir tweerigtingverkeer en swaarvoertuie. Met hierdie aanpassing kan 8-ton vragmotors toegelaat word vir konstruksie, maar geen geartikuleerde vragmotors word toegelaat nie. As iemand beheer oor 'n voertuig of swaarvoertuig verloor agv van die styl gradient van die pad is ook direk geraak word, ons kleinhoewe is ongelukkig reg oorkant die serwituutpad.</p> <p>Vier insidente in 2022 / 2023 – Sandhoogte straat:</p> <ul style="list-style-type: none"> • n dame verloor beheer oor haar voertuig op Sandhoogte grond pad, agv roekelose bestuur – hoë alkohol inhoud en hoë spoed, die motor rol en kom tot stillstand in ons kleinhoewe, nadat sy ons hoekpaal afgery het. • een klein vervoer voertuig op servituut pad veroor beheer, die bejaarde drywer was ernstig beseer • een groot swaarvoertuig in Sandhoogte Straat verloor beheer met baie skade aan eindomme en die ander voertuig wat meegesleur is – die drywer van die ander voertuig was ook beseer. • Elektriese voorsiening en paal op ons hoek word afgery deur besope person teen hoe spoed, die krag was n geruime tyd uit tot dit herstel kon word. <p>Die meeste bestuurders hou nie by die verkeerslimiet van 60 km/h in Sandhoogte straat nie.</p>	<p>Ek neem kennis dat meeste bestuurders nie hou by die verkeerslimiet van 60km/h in Sandhoogtstraat nie, maar dit is egter die verantwoordelikheid van die Padowerheid om spoedbeperkings te implimenteer waar stedelike uitbreiding dit noodsaak om dit veilig te maak vir alle padgebruikers. Die ingenieur het wel voorsiening gemaak vir 'n voldoende skouerafstand by die ingang na die voorgestelde ontwikkeling (125m in beide rigtings) sodat toekomstige inwoners 'n wye skouersigafstand het om aankomende verkeer betyds waar te neem.</p>

<p><u>Konstruksie:</u></p> <p>Waar sal konstruksiemateriaal geberg word vir 12 (erf en beplan) enkele residensiële eiendomme? Materiaal, groot konstruksievoertuie, dienste, vragmotors, vullisverwydering, riool – of vorm die dienste deel uit van die sekuriteits kompleks? Volgens verslae gaan die ontwikkelaar ook vervreem nadat die erwe verkoop is. Hoe lank het die nuwe eienaars tyd om hul huise op te rig, wie gaan die proses bestuur? Ek wil graag verstaan wat die tydperk van aktiewe konstruksie fases gaan wees? Die serwituitpad is +/-13m vanaf ons hoofhek, enige agterstand op verkeer na die nuwe perseel sal voor ons woning wees. Dit neem tans 5 min om dorp toe te ry, dit sal tydens spitsverkeer beïnvloed word.</p> <p>Hoe gaan die verwydering van riool vir die voorgestelde ontwikkeling elke 7 dae bestuur word met verkeer? Dit is n groot voertuig en die pad is nie by voorgestelde Erf 15 baie breed nie? Die water kanaal maak die toeganklike pad en sypaadjies smaller.</p>	<p><u>Berging van Konstruksie Materiaal:</u> Konstruksie materiaal vir die bou van 'n betrokke erf sal op die betrokke erf gestoor word. Die dienste vorm deel uit die sekuriteitskompleks.</p> <p><u>Bestuur van die Suigtenk:</u> Die huiseienaarsvereniging gaan verantwoordelik wees vir die bestuur en beheer van die voorgestelde Suigtenk. Volgens die ingenieur is die interne pad breed genoeg vir die Honeysucker. Die voorgestelde Conservancy Tank is dus net 'n tydelike oplossing tot tyd en wyl die kwessies by Groot Bak krieketpompstasie opgelos is. Ek is in kennis gestel dat Mosselbaai Munisipaliteit alreeds besig is om hierdie kwessies aan te spreek.</p> <p><u>Risiko dat swaar vragmotors beheer verloor:</u> Weens die steil helling langs Tarentaalstraat word daar aanbeveel dat die gewig van konstruksievoertuie tot 8 ton per as beperk word en dat geen geartikuleerde vragmotors toegelaat word nie.</p>
<p><u>RE/2833 GREAT BRAK RIVER – COMMENTS & RESPONSE TABLE</u></p> <p><u>Mossel Bay Municipality – Water & Sanitation, 12 October 2023</u></p> <p><u>14. AppF5 Comments & Response Report.pdf</u></p> <ul style="list-style-type: none"> • Stormwater – sal die nuwe dakke en plaveisel nie 'n negatiewe impak op die water kanaal en kapasiteit hê nie? Ons huis is ook laagliggend / op straatvlak gebou, ons het dus self uitdagings met stormwater agv ons eie styl gradient en ligging. • 'n Aanbeveling is gemaak om reënwater in watertenks op te vang vir huishoudelike gebruik, hoe sal dit toegepas word om nie addisionele druk op huidige water verskaffing te plaas nie? Wat gebeur tydens droogte tydperk as nuwe einaars nie water kan opvang nie? • Die sypaadjies op straatvlak word in stand gehou, maar die water kanaal is vol plantlewe, sal dit nie ook n invloed he op vloei van water nie, veral met harde reen? • Sien asseblief foto's van bestaande watersloot op voorgestelde ontwikkeling, dit korrodeer reeds baie met bestaande watervloei, sonder 12 addisionele huise en stormwater. 	<ul style="list-style-type: none"> • Volgens die dienste verslag van Urban Engineering (2024) word 'n maksimum va 20% van die totale erf verhard (+/- 40 ontwikkeling). Urban Engineering het ook gaan uitwerk watter impak die 20% gaan hê op die bestaande stormwaterkanaal suid van die betrokke erf met die gebruik van die "rasionele metode". Die resultaat was egter dat die kanaal die vloei sal kan hanteer. • Reënwater sal gebruik word vir tuin natmaak. Tydens 'n droogte periode sal die eienaars van munisipale water gebruik maak. Die aansoeker het GLS aangestel om genoegsame water kapasiteit te ondersoek. Volgens GLS is daar genoegsame water kapasiteit vir die ontwikkeling. Daar is ook addisionele kapasiteit vir brandbestyding. • Ons neem kennis van die bestaande watersloot. Die detail ontwerp van die pad aangrensend aan die bestaande watersloot sal voorsiening maak vir effektiewe stormwater beheer.
<p><u>Veiligheid</u></p> <ul style="list-style-type: none"> • Sal enige konstruksiewerke op die perseel oorslaap om materiaal te beveilig? 	<ul style="list-style-type: none"> • Konstruksiewerke sal nie op die perseel oorslaap nie. Die terrein sal eers omhein word voor konstruksie plaasvind, maar sou addisionele sekuriteit vereis word sal die projek bestuurder 'n formele sekuriteit maatskappy kry.

<ul style="list-style-type: none"> • Ons het tans geen tot minimale misdaad, dit is 'n groot bekommernis, veral omdat beurtkrag ons snags vir ure in beperkte lig of duisternis laat • Terreinwerkers moet lokaal wees vlg aanbevelings, daar is n skatting van +/- 100 werkers per dag op terrein. Is daar n maatstaf wat n plek gestel kan word om te bepaal of hierdie werkers nie n kriminele rekord het nie, dit is vir bestaande eienaars n veiligheids risiko – dit is maklik vir die werkers om te bepaal wanneer ons bedags en snags tuis is of nie. • Nuwe eienaars sal ook huishoudelike hulp hê, sowel as tuindienste, en meer potensiële misdaad, voetverkeer en geraas. Dit word deur die munisipaliteit as voordelige werkskepping gesien, en it is, maar dit bly 'n knelpunt vir huidige inwoners. Ons het nie tans n groot toeloop van onbekende mense nie. 	<ul style="list-style-type: none"> • Operasioneel: Omrede die voorgestelde ontwikkeling 'n sekuriteitskompleks gaan wees, sal die huiseienaarsvereniging verantwoordelik wees vir die beheer en bestuur van huishoudelike hulp en tuindienste.
<p><u>Brand</u></p> <ul style="list-style-type: none"> • Ons word jaarliks deur die brandweer gemonitor om brandbane in stand te hou van +/- 10m om die parameter van ons eiendom / kleinhoewe, om veiligheid te verseker tydens n brand, is dit ook n voorvereiste vir die nuwe ontwikkeling met soveel nuwe huise so naby aan ander wonings? 	<p>Ons het die volgende kommentaar van Mosselbaai Munisipaliteit ontvang rakend die risiko van veldbrande: <i>“Footprint development in natural vegetation should take fire risk into account when the application is submitted and evaluated. Such applications can only be approved if acceptable risk mitigation can be proved”</i>.</p> <p>Die Mosselbaai Munisipaliteit verwys na die beplanningsaansoek vir die voorgestelde ontwikkeling, maar van 'n Omgewingskant af het ons ook vuur risiko ingesluit in ons Omgewingsbestuursplan: (a) geen oop vure tydens konstruksie, (b) geen hout mag tydens konstruksie van die eiendom afgehaal word nie, (c) aangewese rookareas, met sandge vulde houers, moet geïdentifiseer word en met personeel gekommunikeer word.</p> <p>Die vallei-thicket wat natuurlik gehou gaan word is 'n lae-brand-risiko plantegroei tipe.</p>
<p><u>Besoedeling</u></p> <ul style="list-style-type: none"> • Stof • 46 + addisionele motors met voltooiing, swaarvoertye tydens konstruksie • Geraas en dampe – (onder andere 43 wonings met tuine wat in stand gehou moet word, + gemeenskaplike tuine) • Dampe – petrol saag gereedskap • Plastiekafval • Kragopwekkers / petrol dampe en geraas? • Riool, vaste afval – reuk van verwydering van riool en vullis elke 7 dae? • Rommelstrooiing, • Fauna en flora, vernietiging van habitat – hopelik kan n groot hoeveelheid Fauna na ons en ander kleinhoewes oorvloei. 	<p>Die omgewingsaksies rakend besoedeling beheer en bestuur word bespreek in die Omgewingsbestuursplan.</p>

<p><u>Marinda se terugvoering (06 May 2024):</u></p> <p>Dankie Mariska.</p> <p>Na aanleiding van ons gesprek in terme van heining versus muur - is dit nie juis veiliger dat die beskermde diertjie nie toegang tot die pad kry vir hulle voortbestaan? As daar 'n wildlife veilige heining by groen area toegang voorsien is hulle mos baie veiliger teen ons mal verkeer? Nou die dag n ystervark doodgery</p>	<p>Fauna Spesialis (Willem Matthee) se terugvoering op Marinda se kommentaar:</p> <p>“Rakende die muur se oprig, ens.: een van Jan (en my) se grootste bekommernisse, is die beweging van diere deur die eiendom. Een van die grootste bedreigings tot Sensitive Species 8, is dat hulle afgesny word van mekaar a.g.v mure, ens., end at daar dus inteling plaasvind en die bevolking op die ou einde uitsterf. Dis egter nie net 'n bekommernis vir die Sensitive Species 8 nie, maar sal die grootste impak hê op hulle, aangesien hulle teen lae digthede voorkom, en beperkte habitatte in die area het. Daarom is dit vir ons baie belangrik dat 'n diere-vriendelike heining die kompleks omring. Daar moet ook funnel ingesit word en diere moet juis kan beweeg tussen verskillende areas wat nog inheemse plantegroei bevat”.</p>
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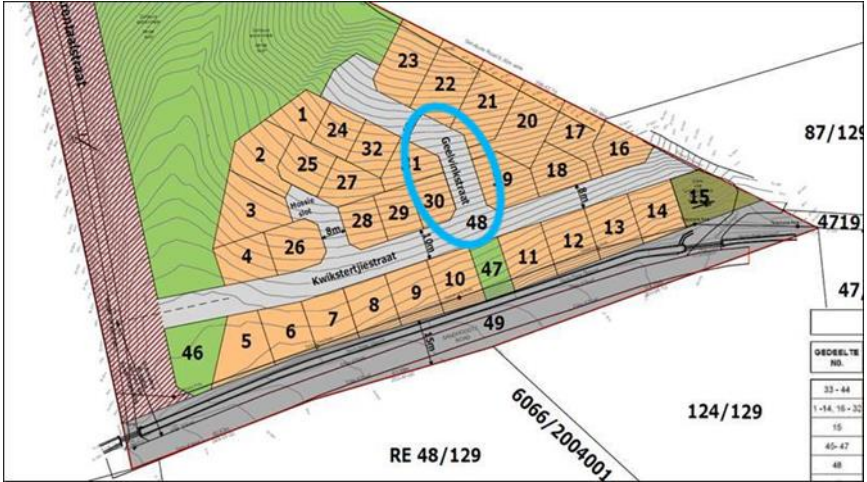
Altus Eitner (Mossel Bay Municipality), 10 April 2024

Comment	Response
<p>Although the Eng. Services Report touches on possible means of managing the steep topography SW by means of SUDS, it remains as such a report & concept. The frustration comes in during development stage with the Main Contractor, the Developer, and subsequently the Home Owners Association. I would expect that the Professional Team appointed by the owner/developer to enforce the SUDS during each stage. In other words, during site cleaning & clearing, construction of bulk services & roads, Building Plan Applications, individual Builders, and ultimately the HOA. There's a long way to go until we can determine if the SUDS is effective or not. Usually after the Development is fully built, then only we see the problems. From our department we maintain Sandhooftge pad and the open SW channel - and again raise our concern w.r.t. erosion, siltation and flooding during all stages as mentioned above. Will Cape-ea-Prac and Urban Engineering oversee this development to the full extent?</p>	<p>We are not appointed as the Environmental Control Officer for the site, and I am not sure who the Engineer is going to be. However, the stormwater management actions (SUDS) and outcomes (impacts & risk avoided) are detailed in an Environmental Management Programme (EMPr). The appointed EAP, Engineer, Contractors, and Subcontractors must be compliant with this EMPr during all stages of development (pre-construction design, construction and operational).</p>
<p>BCO Rifaad/Shاون</p> <p>Please refer to attached report, to keep in mind during Building Plan Approvals & Building inspectors.</p>	<p>Noted.</p>

Heritage Mossel Bay to Perception Planning, 5 April 2024

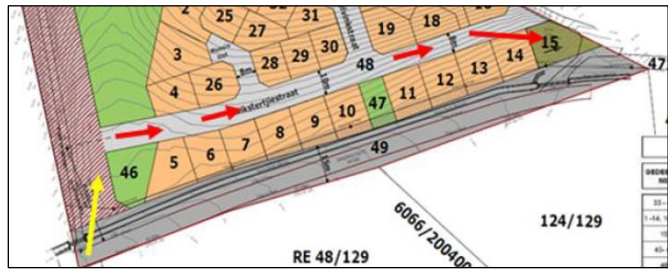
Comments	Response
<p>The proposed rezoning of the property from Agricultural Zone I to make provision for residential development is noted.</p>	<p>Noted.</p>

<p>Please receive comment as prepared by Dr Nick Walker, on the well-presented HIA</p> <p>The AIA is based on Kaplan's study of the same area, but unfortunately his report is missing from HWC's archives. It is suggested that another report is obtained from the author. It would thus be useful to know his survey method and how thorough it was. Pictures of the area indicate dense vegetation and thus low visibility so how was this adjusted for.</p>	<p>The following response to Heritage Mossel Bay's comment was prepared by Dr Lita Webley:</p> <p><i>Kaplan's (2009) Archaeological Impact Assessment report on Erf 2833 was submitted, together with other supporting documents, to Heritage Western Cape as proof of prior assessment of the property during the NID phase. HWC (23rd October 2023) responded to the NID requesting an integrated Heritage Impact Assessment comprising of a Palaeontological Impact Assessment. Due to the fact that Kaplan had already surveyed the property for archaeology (albeit in 2009), a further archaeological investigation was not requested.</i></p> <p><i>For this reason, only the specialist Palaeontological Impact Assessment report was included in the HIA documents submitted for public participation. However, Perception Planning will send a copy of the Kaplan (2009) Archaeological Impact Assessment to Heritage Mossel Bay for their records.</i></p>
<p>Kaplan found only low scatters of ESA and MSA tools over the study area and this deemed the area to be of little heritage significance. Dr Walker states that it is worth pointing out that our study of the past is based on detailed research of a few home bases, yet these people spent most of their time off site. So, these isolated finds reflect other activities. The southern Cape is rich in ESA but we know nothing about these people because they did not use cave sites. The Groot Brak Museum also has some fossil wood found in the area and so there is a possibility of finding more here.</p>	<p><i>Dr Walker is correct in commenting that only a few open sites, comprising Early or Middle Stone Age implements in primary context, have been recovered by archaeologists. There has been some research on Middle Stone Age open sites by Arizona State University along the Vleesbaai coast (Oestmo et al 2014), but these studies are of an academic nature. It is unfortunately extremely rare for archaeologists, conducting surveys for CRM work, to discover these types of sites during the survey stage. Issues of access (i.e. dense vegetation), time and money prevent detailed assessments. HWC is reliant on the CRM archaeologists to identify the archaeological material, assess significance and recommendations for mitigation.</i></p>
<p>A problem is that the report stipulates that, should an occurrence of archaeological or palaeontological significance be found, work must be halted and HWC notified. But who is going to recognise the find and decide whether the site is important? It has previously been proposed that building inspectors have some training in recognising archaeological and fossil finds so they can monitor trenches. Having a trained archaeologist on site for several months simply to monitor excavations is probably not worth it.</p>	<p><i>It is unfortunately the case, that HWC can only stipulate that archaeological monitoring should take place during development when there is a reasonable probability that significant archaeological material may be uncovered or disturbed. Archaeological monitoring can incur prohibitive costs to the development, particular if they are of a small scale. In the majority of cases, HWC stipulates the "standard clause", which is that any archaeological material uncovered during development should be reported to HWC. It is not feasible for HWC to undertake archaeological training of building inspectors' due issues of time and money. It is for this reason that they rely on the members of conservation bodies to report any instances of archaeological destruction to the authorities."</i></p> <p><i>The Archaeological Impact Assessment (Kaplan, 2009) in question is once more attached to this report as Annexure 7. The AIA report was sent to Mossel Bay Heritage for noting (see proof Annexure 6).</i></p>

Comments	Response
<p>Spatial Planning Comments:</p> <p>The property is located within the Urban Edge and earmarked for Urban Expansion in terms of the Mossel Bay Spatial Development Framework/Environmental Management Framework 2022 (SDF/EMF 2022).</p> <p>The property has several developmental constraints which is clear from the SDF/EMF 2022 Status Quo mapping. The layout of the proposed development should be carefully considered as to address the constraints identified in the SDF/EMF 2022 and the specialist studies. It must be mentioned that there is development pressure in the Great Brak River area with almost no land without any developmental constraints.</p> <p>The following development Principles amongst other should be applied:</p> <p>Policy 1(d)(a)</p> <p>a) Development on slopes steeper than 1:4 should only be considered in exceptional cases and with caution concerning visual impact, erosion and cut-and-fill scars.</p> <p>Policy 5(b)(d-f, i) d) No new development on sloped steeper than 1:4</p> <p>7e) The preferred maximum gradient of roads is 1:5.</p>	<p>Thank you very much for your comments on the proposed development on RE/2833, Great Brak River.</p> <p>The proposed erven are not steeper than 1:4. However, a small section of internal road “Geelvinkstraat” is between 1:4 and 1:5 (please see section below – blue outline). Stormwater from this section was also considered by making Erf 47 a Private Open Space Erf rather than a Residential Erf:</p>  <p>Please let me know your thoughts on this and if we should consult with Altus on this matter.</p>
<p>f) Footprint development in natural vegetation should take fire risk into account when the application is submitted and evaluated. Such applications can only be approved if acceptable risk mitigation can be proven.</p>	<p>The valley-thicket is a low fire-risk vegetation type. All aliens will be removed and dispose of correctly to avoid any fire-risk. The following mitigation measures are also included in the Final EMPr:</p> <ol style="list-style-type: none"> 1. No open fires permitted anywhere on site during the construction period. 2. No wood may be collected from the property during construction. 3. Designated smoking areas, with sand filled containers, must be identified and communicated with staff.
<p>i) Landslide probability and mitigation should be investigated via expert inputs during land use application evaluation processes.</p>	<p>Iain Paton from Outeniqua Technical Services will compile a Pre-Liminary Geotechnical Report.</p>

<p>The subject property is earmarked for Urban Expansion in terms of the SDF/EMF 2022 as Urban Expansion area 68 (see proposal below). The property is also part of the Sandhoogte Road corridor which could accommodate higher residential densities.</p>	<p>Noted.</p>
<p>Spatially the development is supported subject to the application of the SDF/EMF 2022 development policy principles regarding the developmental constraints of the property.</p> <p>Note:</p> <ul style="list-style-type: none"> • It should be considered to make all the residential erven Group Housing properties due to the small size on the erven. • Clarity must be provided regarding the management and maintenance of infrastructure which will serve more than one development. • Stormwater management is very important in the area. 	<p>Noted.</p> <p>All residential erven will change to Group Housing properties.</p> <p>The HOA will manage and maintain infrastructure on the property.</p> <p>Urban Engineering discusses the management of stormwater in detail in the Services Report (2024). Stormwater management was further discussed with Altus from Mossel Bay Municipality.</p>
<p><u>UPDATE:</u></p> <p>Jaco Roux requested that we change the alignment of the proposed internal roads so that the roads are not steeper than 1:5.</p> <p>The alignment of the internal roads was changed by Jan Vrolik (Town Planner) using the gradient analysis done on the property. The SDP is updated with this alignment change and included in the Final BAR.</p>	
<p>Dion Lubbe, 27 March 2024</p>	
<p>Comments</p>	<p>Response</p>
<p>I would like to register as I&AP member:</p> <p style="text-align: center;">Dion Lubbe cel 0824644262 dionlubbe65@gmail.com 46 Sandhoogte pad Grootbrak rivier</p>	<p>Baie dankie vir jou kommentaar op die voorgestelde ontwikkeling op RE/2833 Groot Brak. Ek bevestig hiermee dat ek jou geregistreer het as 'n belanghebbende tot hierdie aansoek.</p>

<p>Ons teken beswaar aan teen die ontwikkeling. Ek voorsien logistieke probleem gedurende die bou proses, aan houdende leegmaak van tank wat weekliks plaasvind.</p> <p>Ek het belê in die erf omdat dit oop ruimte bied en n stil area is. Die tipe ontwikkeling is geensins n aanwinst vir die gebied en verander die karakter van ons omgewing.</p>	<p>Die <i>Conservancy Tank</i> is 'n tydelike oplossing net tot die probleme by die Krieketveld Pompstasie opgelos is. Ek is in kennis gestel dat die Munisipaliteit alreeds besig is om aan hierdie kwessies te werk.</p> <p>Die betrokke terrein (RE/2833) is geïnkorporeer by die sogenaamde 'stedelike rand' van Groot Brak tesame met die eiendomme suid van die voorgestelde ontwikkeling. Die betrokke terrein (RE/2833) is ook aangewys vir stedelike invul-ontwikkeling soos per Mosselbaai se ruimtelike ontwikkelingsraamwerk (2022).</p> <p>Die eerste goedkeuring wat vir hierdie terrein verkry is, was in 2010 (omgewingsmagtiging sowel as grondgebruikbeplanningsmagtiging). Hierdie magtigings was geldig tot laat 2017. As gevolg van hierdie goedkeurings het die terrein binne die stedelike rand gebly selfs met die jongste 2022 ruimtelike ontwikkelingsraamwerk. Wanneer u die verslag lees, sal u ook 'n idee kry van die oorspronklike goedkeurings teenoor die huidige voorstel, wat 'n verminderde weergawe van die 2010-magtiging is.</p> <p>Volgens die stadsbeplanner word die voorstel geag in lyn te wees met die ruimtelike beplanningsbeleid en grondgebruikbestuursvisie vir Groot Brak.</p> <p>Soos met alle voorstelle, sal die eienaar (en toekomstige inwoners sou die Owerhede hierdie voorstel vir magtiging oorweeg) bestaande grondgebruike in die gebied moet respekteer en erken (wat deurlopende landbou-aktiwiteite kan insluit). Nuwe ontwikkelings moet nie inbreuk maak op die bestaande en/of primêre regte van ander grondeienaars in die gebied nie, m.a.w moet nie daartoe lei dat ander grondeienaars hul primêre / wetlike regte uitoefen nie.</p>
<p>Ek verstaan ook dat dit n baie steil erf is en storm water n groot probleem mag wees, ek het jul rapport gesien en dat julle daarvoor beplan, dit maak die ontwikkeling buitensporig duur en ek verstaan nie hoe die ontwikkeling winsgewend kan wees nie.</p>	<p>Rakend stormwater, jy is heeltemal reg, omdat die erf baie steil is, is stormwaterbestuur baie belangrik. Die Ingenieur het bevestig dat die kapasiteit van die bestaande stormwaterkanaal genoeg is vir die voorgestelde erwe, maar die Ingenieur stel ook addisionele maatreëls voor soos reënwatertanks, swaels, soakaways en deurlaatbare opritte.</p>
<p>Colin Belter, 17 March 2024</p>	
<p>Comments</p>	<p>Response</p>
<p>My property borders the proposed development and I have three concerns.</p> <p>My first concern is the 75000 litre septic tank, it is stated in the engineering report that this septic tank will be emptied one a month. According to logical calculation, 75000 l divided by 31 units equals 2420 litres per unit per month. If I further divide this waste</p>	<p>Thank you so much for providing comment on the proposed development. Your concerns are acknowledged, and we consulted the Engineer.</p>

<p>water by 30 days then I get to 80 litres per unit per day. So if there are two people per unit then that means that each person will produce 40 litres of waste water per day. This appears not to make much sense, please advise me if I have miss read the report correctly or not.</p>	<p>With regards to your first concern, please note that it will not be a 75000l septic tank but a 141000l conservancy tank that will be pumped out every 7 days once the development is fully occupied. The tank will be 5m (length) x 10m (width) x 3m (depth).</p> <p>The conservancy tank is only a temporary solution until such time the challenges at the Cricket Field pumpstation are resolved. Therefore, the conservancy tank will be positioned on Erf 15, the lowest side of the site, to allow future connection to the Municipal gravity line.</p> <p>It was previously proposed to install a 95000l conservancy tank which will only be big enough for an occupancy rate of 65% with the idea that by the time the development will reach 65%, the challenges at the Cricket Field pumpstation be resolved. However, considering additional information from the Municipality, the challenges at the pumpstation might take longer than expected. Therefore, the proposed tank capacity is 141000l (100% occupancy rate).</p>
<p>My second concern is how does the honeysucker access this septic tank, according to my observation there will be two trucks required every three days to service these 31 units. According to the report the septic tank will only be emptied once a month and as I have explained above that makes not logical sense. I am also looking for confirmation that the honey sucker will not inconvenience the access to property 129/87 and property 5131.</p>	<p>With regards to your second concern, the honeysucker will enter the estate via the existing servitude on the property's western boundary (Tarrentaal street - yellow arrow). It will reach Erf 15 (conservancy tank) via Kwikstertjestraat which will be approximately 8 - 10m wide (red arrows).</p> 
<p>My third concern is the close proximity of these units to the road. Keeping in mind that the corner by the development is a blind corner and I have personally witnessed near accidents with cyclists coming down the hill and vehicles going up the hill and not being aware of each other until the last moment. There is no shoulder on the outer radius of the road and that is what makes the corner dangerous. My concern is with the units being so close to the road that there will be no scope left for the municipality to widen the outer radius of the corner at this point.</p>	<p>With regards to your third concern, Sandhoogte Road is approximately 7m wide with a road reserve width of 20m. The units do not affect the position of the road reserve. If improvements to the road's geometry are planned in the future, they will take place within the road reserve.</p> <p>The corner by the development is noted. Based on the 60km/h posted speed limit, a Shoulder Sight Distance of 125m is required. A Shoulder Sight Distance of more than 125m was measured in both directions:</p>



131m SSD MEASURED FROM SERVITUDE ROAD, IN DIRECTION OF DR1578

Figure 8-7 - SSD towards DR1578



203m SSD MEASURED FROM SERVITUDE ROAD, IN DIRECTION OF MR0348

The minor timber structure obscuring the Shoulder of Sight Distance (SSD) will either be removed or moved to a position where it does not affect SSD.

To protect mobility at the Sandhoogte / Tarrentaal str. intersection , the movement along Tarrentaal str. received priority by implementing the road marking configuration as indicated below:



Simon van der Stel Foundation: Southern Cape to Perception Planning, 12 March 2024

Comments	Response
<p>Thank you for the documentation regarding the above. It is very comprehensive and interesting.</p> <p>The Simon van der Stel Foundation: Southern Cape agrees with your proposal for actions to be taken in the event archaeological material or human graves are encountered. We support the setting of conditions for the acceptance of your report and with the general assessment of the heritage value of the site.</p> <p>We see no reason to oppose the development as per your draft HIA and support the application.</p>	<p>Noted.</p>

Craig & Jeanne van den Heuvel, 08 March 2024

Comments	Response
<p>As my mother owns the property across Sandhoogte Road, Great Brak River, we would like to register as Interested and Affected Parties.</p> <p>Please register:</p> <p>Jeanne van den Heuvel, 48 Sandhoogte, Great Brak River, 0824977429.</p> <p>Craig van den Heuvel, 111 Mann Street, Loerie Park George, 0829257355</p>	<p align="center">Noted.</p> <p align="center">Jeanne & Craig van den Heuvel are registered as I&APs.</p>
<p>Response to Notice MOS788/08 DEA&DP Ref: 16/3/3/1/D6/17/0009/24 of 7 March 2023:</p> <ol style="list-style-type: none"> The proposed development is noted to fall within an agricultural area directly opposite my mother's smallholding, on which she farms with sheep, chickens, geese, and pigs. This is a working farm and has been so for more than 40 years. 	<p>Your comment on the zoning and sense of place is duly noted and will be captured as part as part of the process. We'll make the necessary correction to reflect the land use of the small holdings.</p> <p>I would advise also having a look at the Draft Basic Assessment Report that documents all the spatial planning components in more detail. But for now, please allow me to summarise what we have taken from the Municipal Spatial Development Framework and other planning documentation. I have attached a copy of the main</p>
<ol style="list-style-type: none"> The proposed development is surrounded by agricultural zone 1 land as indicated on the Mossel Bay Municipality GIS website and included below. 	



report, but please do feel free to also visit our website for the full electronic version inclusive of all the Appendices and specialist reports.

The site in question has been incorporated into the so-called 'urban edge' of Great Brak and it is designated for urban infill development. The first approval that was obtained for this site was in 2010 (environmental authorisation as well as land use planning authorisation). These authorisations were valid till late 2017. As a result of these approvals, the site has remained within the urban edge even with the latest 2022 spatial development framework.

When reading the report, you'll also get a sense of the original approvals vs the current proposal which is very much a reduced version of the 2010 authorisation.

According to the urban planner on this project, the proposal is deemed to be in line with the spatial planning policy and land use management vision for Great Brak.

3. Your statements refer to the proposed property being bounded by residential dwellings creates the perception that this is a residential area where in fact it is still agricultural. Property 5131 adjacent to the proposal, farms with goats. The Mossel Bay Municipal by-law on residential areas prohibits the keeping of livestock. The proposed development may in no way affect our livelihood as farmers, the land on which we have farmed for more than 40 years.

RE/2833 is ±6ha in size and currently zoned Ag Sandhoogte Road and is accessible via a narrow s boundary (Figure 2). The property is located inside and is bounded by residential dwellings to the ea the south.

4. The proposed development will severely change the agricultural landscape in the area, it will change our sense of being. The current residential dwellings surround the proposed development are spacious and are located small holdings, not densified to 286 square meters.

5. Our understanding is that this will be a care facility for the aged and would not be in keeping with a noisy bustling farming community with associated disturbances.

The proposal is not for a retirement facility. It is for a normal residential development.


<p>It will be a sad day when farmers lose their livelihoods due to the encroachment and densification of new residential developments. We do not agree to this proposed development.</p>	<p>As with all proposals, the owner (and future residents should the Authorities consider this proposal for authorisation) will have to respect and acknowledge existing land uses in the area (which may include ongoing agricultural activities). When 'coming to source' such new developments may not infringe on the existing and/or primary rights of other landowners in the area i.e. may not result in other landowners from exercising their primary / lawful rights. It is noted however that Municipal By-Laws regarding the keeping of domestic livestock and animals in urban areas still applies and should any events arise where such animals may be deemed a nuisance, the existing By-Laws will apply.</p>
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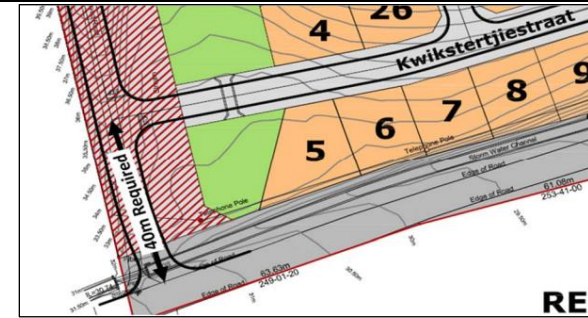
Mossel Bay Municipality – Water & Sanitation, 12 October 2023

Comments	Response
<p>We accept the suggestion of conservancy tank for the internal sewer for the development. We are in the process of attending to the challenges at the Cricket Field pumpstation. The Great Brak Water Treatment Plant is current being upgraded and there is sufficient capacity to deal with the sewage volumes from this development.</p>	<p>Noted. The Utility Zone will be transferred to the Homeowners Association who will be responsible for the administration, management and maintenance of the conservancy tank. A private contractor will be contracted by the Homeowners Association to service the conservancy tank. The Homeowner's Association can connect the internal sewer network to the municipal sewer network in the future when the municipal pumping station has the necessary capacity.</p>
<p>We accept you suggestion with regards to the internal water reticulation for the development.</p>	<p>Noted.</p>
<p>The available storage capacity of the water reservoir must be determined by GLS. The developer will be responsible for the cost for the report from GLS.</p>	<p>GLS Consulting (Pty) Ltd was appointed to conduct a capacity analysis of the bulk municipal water services for the proposed development. It was confirmed that the existing Sandhoogte water reticulation system has sufficient capacity to accommodate the proposed development and that no additional reservoir storage capacity is required for firefighting volumes.</p>

Mossel Bay Municipality – Stormwater, 12 October 2023

Comments	Response
<p>Punt 5, Terloops, ek onthou nie dat iemand vir my gevra het hieroor nie? Die inligting is mos standaard Siviele berekeninge, itv "Rational Method", die totale opvang gebied van Sandhoogtepad ens. Die kanaal se dwarsnit is min of meer uniform, daar is n helling, dws jul Siviele Ingenieur kan die SW afloop en konsentrasie bepaal, gegewe die helling, en kanaal snit.</p>	<p>The SUDS Principle is practical and will be included in the detailed design of the internal roads. The HOA will maintain it.</p>

 <p>Figure 5-1: Existing stormwater infrastructure</p> <p>There is no information available regarding the spare capacity of the existing stormwater channel.</p>	<p>Based on comments received from Mossel Bay Municipality, Urban Engineering arranged a meeting with the Mossel Bay Municipality on 06 November 2023 to discuss the stormwater detail as previously requested (left).</p> <p>The following points were agreed to:</p>
<ul style="list-style-type: none"> • Verder, die SUDS teorie is oulik en als, maar is dit prakties tydens konstruksie, tydens huis verkope, tydens lock & go persele ? • Gaan die HEV/HOA dit onderhou, gaan daar gereelde onderhoud wees ? Ek sal graag meer detail wou sien rondom die aflope en beheer. • Stormwater vanaf die 31 Algemene Residensiële Sone I erwe sal suidwaarts na die bestaande stormwaterkanaal aan die suidelike grens van die eiendom dreineer - <i>Soek berekening, en uitlegte agv topografie.</i> • Stormwater vanaf die 12 Enkel Residensiële Sone I erwe sal natuurlik na die laagte punt op die eiendom dreineer - En dan ? groot gat en donga erodeer. • So gegewe die styl topografie, wil ek graag baie meer detail sien rondom SW beheer, die opvang gebied in geheel van Sandhoote pad versus die bestaande kanaal, • die bydra van hierdie ontwikkeling, die erosie beheer ens. • Alle toegang sal wees vanaf die een pad aan die Weste kant, geen 2de ingang nie. Slegs 1 aansluiting by Sandhoogtepad. Indien hierdie n veiligheid kompleks gaan wees met hek, moet daar genoeg tou lengte toegelaat word vir 3 / 4 voertuie asook besoeker parking. 	<ul style="list-style-type: none"> • Only one access into the site will be allowed. • Due to the steep road gradient, the weight of construction vehicles to be restricted. • GLS to provide a report pertaining to the Water reticulation to the site. • The rational method must be used to determine the pre- and post-development stormwater run-off volumes. <ul style="list-style-type: none"> ○ Urban Engineering determined a high-level estimate of the expected stormwater run-off for minor (1:5 Year) and major (1:50 Year) storms for the expected catchment area. Based on Urban Engineering's calculations, the introduction of lawns, soft landscaped beds, rainwater harvesting tanks and roads that cut across the general fall of the site, will lead to an increase in time of concentration and subsequent reduction in Peak Flow Volumes (Rational Method) • To limit stormwater runoff, surface hardening should be restricted to 60% of the erf footprint. <ul style="list-style-type: none"> ○ The proposed development makes provision for 43 residential units, comprising of a mixture of 2- and 3-bedroom units. The two 2-bedroom unit has a floor area (including garage & patio) of approx. 141m² while the 3-bedroom unit has a footprint of approx. 163m². It can be argued that the total proposed development has the potential to create ~11700m² hard surfaces (dwellings, patios, driveways, garages and internal roads). Since the size of RE/2833 is ~60 400m², it follows that ~20% of RE/2833 will be hardened. • The position of Kwikstertjiesstraat is situated approximately 40m away from Sandhoogte road edge, ensuring that the two intersections are not situated within each other's envelope (Traffic Impact Assessment, 2024).



After the meeting the shortcomings were addressed and included in the Civil Services Report (2024).