Western Cape Government
Environmental Affairs and Development Planning
BETTER TOGETHER.

NEMA SECTION 24G APPLICATION COMPLETENESS CHECKLIST

IMPORTANT: Kindly ensure that this checklist is completed and attached to the NEMA SECTION 24G Application.

Please indicate by ticking the following below to serve as confirmation that the required information has been included in the application.

No.	Application Requirements	Please tick for confirmation
1.	Requirements of Preliminary Advertisement (pre-application public participation requirements including register of all I&APs), in accordance with Annexure A, Section D of the Section 24G Fine Regulations. **(Note: Failure to meet the Regulation 8 will result in rejection of the application)**	To be included in final submission
2.	Application form has been completed and attached, which includes among others:	
	2.1. A list of all listed activities and/or waste management activities that was triggered when the development activity was commenced with.	√
	2.2. A list of all **similarly listed** activities in terms of the current EIA regulations (if applicable).	√
	2.3. A description of the receiving environment **before** commences of the activity(ies).	√
	2.4. A description of the receiving environment **after** commences of the activity(ies).	√
	2.5. All appendices and annexures:	
	2.5.1. Locality map	√
	2.5.2. Site plans or/and Layout plan	√
	2.5.3. Building plans (if applicable)	n/a
	2.5.4. Colour photographs	√
	2.5.5. Biodiversity overlay map	√
	2.5.6. Permit(s) / license(s) from any other organ of state including service letters from the municipality	n/a
	2.5.7. Public participation information: including a copy of the register of interested and affected parties, the comments and responses report, proof of notices, advertisements, Land owner consent and any other public participation information	To be included in final submission
	2.5.8. Environmental Management Programme	√
	2.5.9. Certified copy of Identity Document of Applicant	To be included in final submission
	2.5.10. Certified copy of the title deed (or title deeds in the case of linear activities)	To be included in final submission
	2.6. Signed declaration forms.	√
3.	Are any specialist assessments required: e.g. Botanical, Hydro-geological, soil, socio-economic?	**Y X** / N
	3.1. If yes, has the specialist assessment report been attached to the application?	√
4.	An assessment of the impacts of the activity or activities in terms of the following categories:	
	• Socio-economic	√
	• Biodiversity	√
	• Sense of place &/or Heritage/ Cultural	√
	• Any pollution or environmental degradation which has been, is being, is being or may be caused	√
5.	A methodology of how the investigation into the impacts associated with the unlawful activity was undertaken.	√

6.	Completed and attached representations of Annexure A, Section A (Directives) in terms of the S24G Fine Regulations: Information/ Representation submitted in terms of any Directives the Minister/ decision maker may issue in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA) s24G(1)(b)(i)-(viii).	√
7.	Completed and attached representations in terms of Annexure A, Section B (Deferral) of the S24G Fine Regulations.	√
8.	Completed and attached representations in terms of Annexure A, Section C, Part 1 (Fine Quantum based on the assessment as specified above (4).	√
	Confirmation that Annexure A, Section C, Part 1 has been completed by an environmental assessment practitioner (EAP)	√
9.	Compliance history of the applicant:	
	9.1. Completed Annexure A, Section C, Part 2 and 3; namely:	
	9.1.1. Whether or not administrative enforcement notices, including pre -notices where appropriate, have previously been issued to the applicant in respect of a contravention of section 24F(1) of the NEMA and/or section 20(b) of the National Environmental Management: Waste Act (Act 59 of 2008) (NEM: WA).	√
	9.1.2. Whether or not the applicant has previously been convicted in respect of a contravention of section 24F(1) of the Act and /or section 20(b) of the NEM: WA;	√
	9.1.3. Whether or not the applicant has previously submitted a section 24G application in respect of an activity or activities which commenced prior to the activity or activities that are the subject of the current application; and	√
	9.1.4. Whether the applicant is a firm or a natural person. (see Section 24G Fine Regulations for definition of "firm")	√
	9.2. Provided information or whether or not any of the directors of the applicant firm are, or were, at the relevant time, directors of a firm to whom the above (9.1.1. - 9.1.3.) applies;	√
	9.3. Advise on whether an applicant who is a natural person is, or was, at the relevant time a director of a firm to whom the above (9.1.1.- 9.1.3.) may apply.	√
10.	Consultation with relevant State departments in terms of section 24O(2) & 24O(3) of the NEMA.	To be included in final submission. Comments and Responses report attached.
	10.1 Proof of Consultation with relevant State departments, including, *inter alia*, notices, adverts etc.	
	10.2 Copies of comments and responses included in the application.	
	10.2 Comments and Response report attached to the application.	
11.	Public Participation Process undertaken in terms of Chapter 6 of the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations, 2014") *(GN No. R.326 of 7 April 2017)* **(if conducted/undertaken)**	To be included in final submission

Western Cape Government
Environmental Affairs and Development Planning

Section 24G Application Form for the consequences of unlawful commencement of listed activity/ies in terms of the:

- **National Environmental Management Act, 1998 (Act No. 107 of 1998), ("NEMA");**
- **National Environmental Management: Waste Act, 2008 (Act 59 of 2008) ("NEM: WA")**

April 2018

Form Number S24GAF/04/2018

Kindly note that:

1. This application must be submitted where a person has commenced with a listed or specified activity without an environmental authorisation in contravention of section 24F(1) of NEMA (i.e. where the person commenced with an activity listed or specified in terms of section 24(2) (a) or (b) of NEMA - the activities contained in the EIA Listing Notices) or has commenced, undertaken or conducted a waste management activity without a waste management licence in terms of section 20 (b) of the NEM:WA.

2. This **Application Form** must be completed for all section 24G applications, by an independent Environmental Assessment Practitioner ("EAP").

3. This Application Form is current as of 01 April 2018. It is the responsibility of the Applicant/EAP to ascertain whether subsequent versions of the Application Form have been published or produced by the competent authority. Note that this Application Form replaces all the previous versions. This updated Application Form must be used for all new applications submitted from 01 April 2018.

4. **<u>The contents of this Application Form include the following:</u>**

   PART 1 -
   Section A: Background Information
   Section B: Activity Information
   Section C: Description of Receiving Environment
   Section D: Need and Desirability
   Section E: Alternatives
   Section F: Impact Assessment, Management, Mitigation and Monitoring Measures
   Section G: Assessment Methodologies and Criteria, Gaps in Knowledge, underlying Assumptions and Uncertainties
   Section H: Recommendations of the EAP
   Section I: Representations - Response to an Incident or Emergency Situation
   Section J: Public Participation Process

   PART 2 –
   ANNEXURE A of Fine Regulations
   Section A: Directives
   Section B: Deferral of the Application
   Section C: Quantum of the section 24G fine
   Section D: Preliminary advertisement

   PART 3 –
   Appendices and Declarations

   PART 4 –
   ANNEXURE B: Waste Management Activity Supporting Information (if relevant)

5. An independent EAP must be appointed to complete the required sections (in terms of NEMA and its Regulations) of the Application Form on behalf of the applicant; the declaration of independence must be completed by the independent EAP and submitted with this Application Form. If a specialist report is required, the specialist will also be required to complete the declaration of independence.

6. Two hard copies (including the original) and one electronic copy (CD/DVD/Flash drive) of this application form must be submitted.

7. The required information must be typed within the spaces provided. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. The space provided extend as each space is filled with typing. **A legible font type and size must be used when completing the form.** A digital copy of the Application Form is available on the Department's website https://www.westerncape.gov.za/eadp/

8. The use of "not applicable" in the Application Form must be done with circumspection.

9. **No faxed or e-mailed application forms will be accepted.**

10. Unless protected by law, all information contained in and attached to this application will become public information on receipt by the competent authority. Please note that, unless exemption has been granted in terms of the National Exemption Regulations published under GN R994 in GG 38303 of 8 December 2014, any Interested and Affected Party should be provided with the information contained in and attached to this Application Form as well as any subsequent information submitted.

11. This Application Form must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department.

PROCESS TO BE FOLLOWED:

a) **Prior to submission of an Application Form,** the applicant is required to undertake a pre-application public participation process in terms of Regulation 8 of the Regulations relating to the procedure to be followed and criteria to be considered when determining an appropriate fine in terms of section 24G published in the Government Gazette on 20 July 2017, Gazette No 40994, No. R. 698 ("Section 24G Fine Regulations").

b) Together with the submission of a section 24G Application Form, the form **must include Proof of compliance of with Regulation 8** of the Section 24G Fine Regulations, including, but not limited to, proof of the pre-application advertisement in a local newspaper and register of I&APs.

c) The Department will acknowledge receipt of the application (within 14 days) and provide the Applicant / EAP with the relevant application reference number to be used in all future correspondence and the application public participation processes.

d) Upon receipt of the application, the MEC/Competent Authority may direct the applicant in terms of section 24G(1)(i-viii) of the NEMA.

e) In terms of the provisions of section 24G of NEMA, the applicant must pay an administrative fine up to a maximum of R5 million before the MEC/Competent Authority decides on the application.

f) The applicant **must within 14 days** of receipt of the determination of the quantum of the fine, ensure that all registered interested and affected parties are notified of the determination of the quantum of the fine, including the reasons and provided with access to the determination.

g) The administrative fine **must be paid within the time period stipulated** in the determination. Failure to pay the fine within the specified period, will result in the lapse of the application and any partial amounts paid in will not be refunded.

h) **Proof of payment of the fine must be submitted to the Department**. Upon payment of the administrative fine, the MEC/Competent Authority may-

- refuse to issue an environmental authorisation; or
- issue an environmental authorisation to such person to continue, conduct or undertake the activity subject to such conditions as may be deemed necessary, which environmental authorisation shall only take effect from the date on which it has been issued; or
- direct the applicant to provide further information or take further steps prior to making a decision provided for above;
- together with the above decision the MEC/Competent Authority may direct a person to rehabilitate the environment within such time and subject to such conditions as may deem necessary or take any other steps necessary under the circumstances.

PLEASE NOTE THE FOLLOWING:

1. Failure to comply with a directive may result in the institution of appropriate legal action as is deemed necessary and as provided for in the legislation.

2. The submission of an application or the granting of an environmental authorisation shall in no way derogate from—
   (a) the environmental management inspector's or the South African Police Services' authority to investigate any transgression in terms of NEMA or any specific environmental management Act;

(b) the National Prosecuting Authority's legal authority to institute any criminal prosecution.

3. If, at any stage after the submission of an application it comes to the attention of the Minister, Minister for mineral resources or MEC that the applicant is under criminal investigation for the contravention of or failure to comply with section 24F(1) or section 20(b) of the *National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)*, the Minister, Minister for mineral resources or MEC may defer a decision to issue an environmental authorisation until such time that the investigation is concluded and—
   (a) the National Prosecuting Authority has decided not to institute prosecution in respect of such contravention or failure;
   (b) the applicant concerned is acquitted or found not guilty after prosecution in respect of such contravention or failure has been instituted; or
   (c) the applicant concerned has been convicted by a court of law of an offence in respect of such contravention or failure and the applicant has in respect of the conviction exhausted all the recognised legal proceedings pertaining to appeal or review.

4. A person is guilty of an offence if that person:

   - Prior to submission of a section 24G application:
     - fails, in terms of Regulation 8(1), to place a preliminary advertisement in a local newspaper in circulation in the area in which the activity was, or activities were, commenced and on the applicant's website, if any or
     - fails, in terms of Regulation 8(2), to comply with the advertisement requirements set out in Annexure A, section D or
     - fails, in terms of Regulation 8(3), to open and maintain a register of interested and affected parties)); or
     - fails, in terms of Regulation 8(4), to attach to the application form the register of interested and affected parties, which must be included in the report, or form part of the information submitted in terms of section 24G(1) of NEMA.

   - Provides incorrect, false or misleading information in any form, including in any document submitted to a competent authority in terms of the Section 24G Fine Regulations or omits information that may have an influence on the outcome of a recommendation of the fine committee or determination of the competent authority.

5. A person convicted of an offence in terms of these Regulations is liable to a fine not exceeding R5 million or to imprisonment for a period not exceeding 5 years, and in the case of a second or subsequent conviction to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, and in both instances to both such fine and such imprisonment.

DEPARTMENTAL DETAILS

Department of Environmental Affairs and Development Planning,
Directorate: Environmental Governance
Attention: Sub-directorate: Rectification
Private Bag X9086
Cape Town, 8000

Registry Office
1st Floor Utilitas Building
1 Dorp Street, Cape Town

Queries should be directed to the Sub-directorate: Rectification at:
Tel: (021) 483-5827 Fax: (021) 483-4033

View the Department's website on http://www.westerncape.gov.za/eadp for the latest version of the documents

DEPARTMENTAL REFERENCE NUMBER(S) (for official use)

File Reference number (S24G)	
Administrative Fine Reference	

DEPARTMENTAL REFERENCE NUMBER(S) (to be completed by the EAP)

File Reference number (Enforcement), if applicable	**14/1/1/E2/8/10/3/0617/21**
File reference number (EIA), if applicable:	
File reference number (Waste), if applicable:	**n/a**
File reference number (Other (specify)): **BOCMA**	**4/9/2/H70H/Melkhout River 492/1(Rem), Swellendam**

PART 1

PROJECT TITLE

S24G APPLICATION FOR THE UNLAWFUL COMMENCEMENT OF LISTED ACTIVITIES IN TERMS OF NEMA ON REMAINDER OF PORTION 1 OF FARM 492 MELK HOUT RIVIER, SWELLENDAM

RELEVANT REGION IN WHICH THE ACTIVITY COMMENCED

Cross out the appropriate box "☒" in which region the unlawful activity/ies has commenced.

REGION 1 City of Cape Town and West Coast District	REGION 2 Cape Winelands District and Overberg District	REGION 3 Central Karoo District and Eden District
	X	

SECTION A: BACKGROUND INFORMATION

1. APPLICANT PROFILE INDEX

Cross out the appropriate box "☒".

1.1	The applicant is a Natural Person (individual)					
1.2	The applicant is a Firm (i.e. any body incorporated by, or established in terms of, any law as well as any partnership, trust, parastatal or organ of state)					X
1.2.1	If a firm, please tick the relevant box below:					
	Body Corporate	Partnership	Trust	Parastatal	Organ of State	
	Directors of a Company X	Members of a Board	Other, please specify			

Applicant's details (duplicate this section where there is more than one applicant)			
Applicant Name:	Melkhoutrivier Properties (Pty) Ltd		
RSA Identity Number/ Passport Number of Applicant, if natural person:	n/a		
Name of Firm (if applicable):	Melkhoutrivier Properties (Pty) Ltd		
Firm Registration Number:	2021 / 528800 / 07		
Contact Person at the Firm:	Booysen, Jared Jakobus		
List of all (as applicable at the relevant time):	Please insert the names and RSA ID numbers of the relevant persons below – **(In the list below, delete the firms that are not applicable to this application)**		
Directors of a company; or	Name: Booysen, Jared Jakobus RSA ID No. 0103125112088		
Postal address:	PO Box 979		
	Somerset West	Postal code:	7130
Telephone:	021 213 1219	Cell:	083 414 8468
E-mail:	hannes@jpbcivils.co.za; admin@jpbcivils.co.za	Fax:	n/a
Project Consultant	JJ Booysen		
Contact person:	Same as above		
Postal address:	Same as above		
		Postal code:	
Telephone:	( )	Cell:	
E-mail:		Fax:	( )
Name of the Environmental Assessment Practitioner ("EAP") responsible for the application:	Amanda Fritz-Whyte and Lindsay Speirs		
Company name (if any):	PHS Consulting		
Postal address:	PO Box 1752,		
	Hermanus	Postal code:	7200
Telephone:	028 312 1734	Cell:	082 327 2100
E-mail:	amanda@phsconsulting.co.za; ls@phsconsulting.co.za	Fax:	n/a
EAP Qualifications	Amanda: BSc; BSc (Hons) Geology; MSc Water Resource Management Lindsay : BA; BA (Hons); MA Environmental Management		
EAP Registrations/Associations	Amanda: Fellow Member WISA; Member IAIAsa; Registered Environmental Assessment Practitioner: Number 2019/367 (EAPASA); Pri.Sci.Nat (118385) Lindsay: Member IAIAsa; Registered Environmental Assessment Practitioner: Number 2019/1470		
Name of the Landowner:	**Mr JT Kemp** **NOTE: The applicant is in process of purchasing part of the property from the landowner**		
Name of the contact person for the land owner (if other):	n/a		
Postal address:	PO Box 387, Swellendam		

		Postal code:	6740
Telephone:	n/a	Cell:	083 479 9790
E-mail:	Happyhooves14@gmail.com	Fax:	n/a
Person in control of land:	Mr JJ Booysen		
Contact person:	n/a		
Postal address:	PO Box 979, Somerset West		
		Postal code:	7130
Telephone:	021 213 1219	Cell:	083 414 8468
E-mail:	hannes@jpbcivils.co.za; admin@jpbcivils.co.za	Fax:	n/a

Please note:

In instances where there is more than one landowner, please attach a list of landowners with their contact details to the back of this form.

A certified copy of the applicant's (if natural person), alternatively a director's (as defined), Identity Document must be attached to the application.

A certified copy of the title deed of the property/s on which the unlawful listed activity/ies has commenced must be attached to the application.

Municipality in whose area of jurisdiction the activity falls:	Swellendam Local Municipality		
Contact person, if known:	Municipal manager - Mr Anton Groenewald (attention: Mr Ron Brunings)		
Postal address:	PO Box 20, Swellendam		
		Postal code:	6740
Telephone	028 514 8537	Cell:	-
E-mail:	rbrunings@swellenmun.gov.za	Fax:	028 514 2694

Please note:

In instances where there is more than one Municipality involved, please attach a list of Municipalities with their respective contact details to the form.

Property location(s):	The property is located adjacent to the Malgas Infanta Road Nr 268 – to the North of the road.
Farm/Erf name(s) & number(s) including portion(s)	Remainder of Portion 1 of Farm 492 Melk Hout Rivier
Property size(s) (m^2)	The red outline in **Figure 1** is the total farm property which measures 1072.24ha. The green polygon is the site (i.e. the application area) and the Applicant is in process of buying this part of the farm from the landowner (should be completed soon). The application area measures approximately 504 ha in total.
Development footprint size(s) (m^2)	The proposed work which has not commenced: Building of a lodge within the old quarry and natural area, in the northeastern section of the farm. The development footprint will be approximately 1292m^2. And for work already completed on site includes: 1) Access road to dams (**4 020m^2**) 2) Single track farm road (**1500m^2**) 3) Cleaning and expansion of Dam 1 (**4 343m^2**) 4) Cleaning and expansion of Dam 2 (**1 685m^2**) 5) Construction of firebreak road/ access road on eastern boundary (2011) (**5 250m^2**) 6) Expansion of a firebreak road/ servitude road on eastern boundary (2022) (**1 200m^2**) 7) Construction of 2 new landowner's cottages of 150m^2 each and a parking/utility building of 160m^2 (**460m^2 & disturbance footprint of 2700m^2**) 8) Installation of solar pump adjacent to the dam to pump water from the dam (**less than 100m^2**)
SG21 Digit code(s)	C073 000 000 000 492 000 01

Property boundary: See Figure 1

Point	Latitude (S)	Longitude (E)
1	34°21'51.89"S	20°36'58.69"E
2	34°22'9.23"S	20°38'18.03"E
3	34° 21' 27.97"S	20° 38' 24.86"E
4	34° 20' 46.44"S	20° 37' 17.31"E

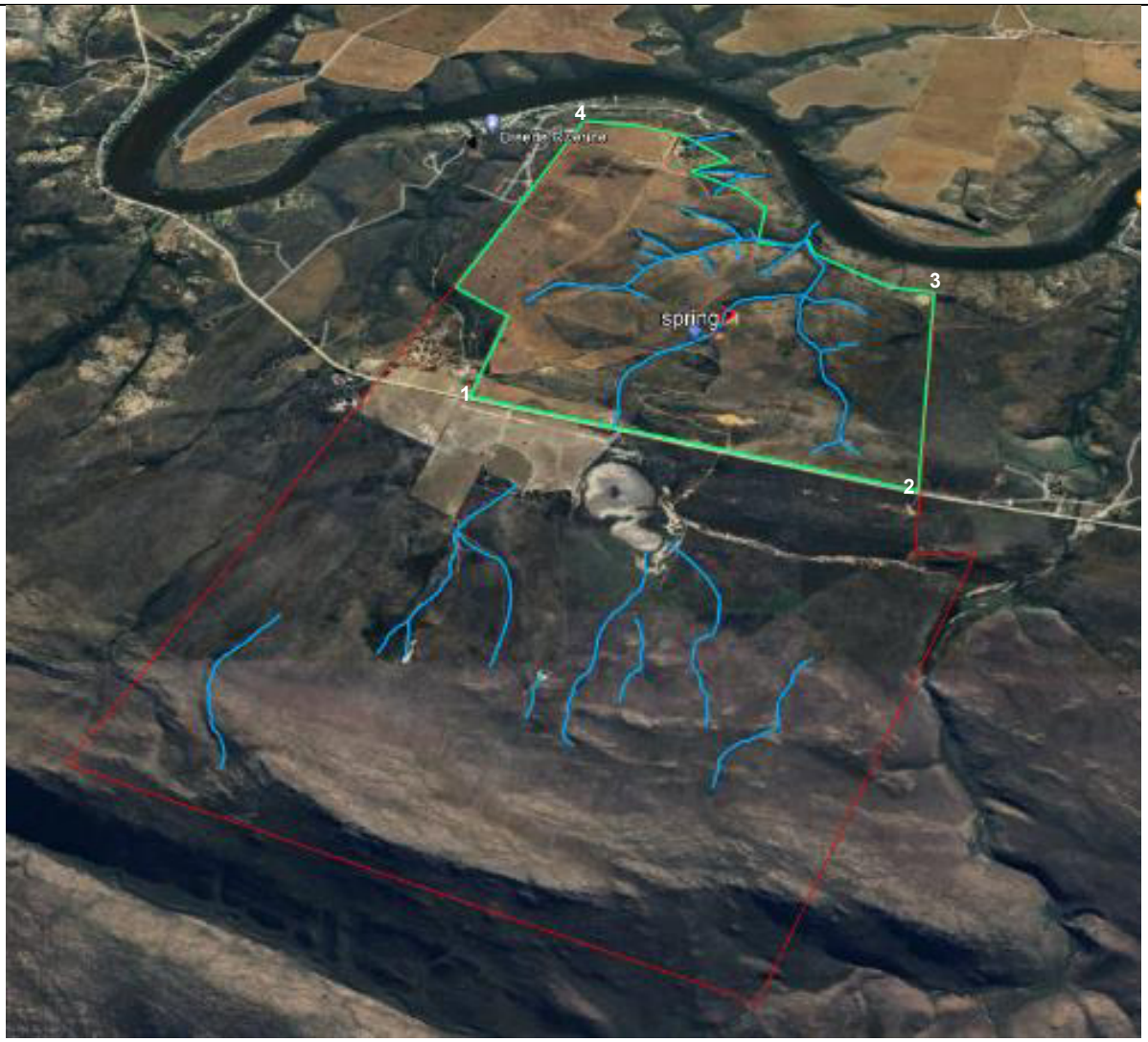


Figure 1: Co-ordinate points of application area boundary

The co-ordinates for the site boundary are:

The co-ordinates for the various unauthorised activities are: See Figure 2

Point	Latitude (S)	Longitude (E)
Access Road to Dams		
A	34°21'58.74"S	20°37'45.32"E
B	34°21'50.43"S	20°37'41.55"E
Cottage 1 and cleared area		
C	34°21'20.25"S	20°37'45.49"E
Cottage 2 and cleared area		
D	34°21'19.97"S	20°37'46.53"E
Parking/ Utility Building and cleared area		
D1 (approximate)	34°21'20.79"S	20°37'45.80"E
Dam 1 and cleared area		
E	34°21'33.44"S	20°37'45.15"E
F	34°21'34.34"S	20°37'46.42"E
Dam 2 and cleared area		
G	34°21'37.67"S	20°37'42.76"E
H	34°21'38.30"S	20°37'43.88"E
Fire break/Road		
I	34°22'8.91"S	20°38'17.98"E
J	34°21'35.25"S	20°38'23.48"E
Fire break/Road extension		
K	34°21'35.25"S	20°38'23.45"E
L	34°21'27.93"S	20°38'24.52"E
Lodge (still to be developed)		

M	34°21'28.94"S	20°38'21.07"E
Single track farm road		
N	34°21'30.96"S	20°37'42.72"E
O	34°21'34.27"S	20°37'47.13"E
P	34°21'42.12"S	20°37'41.22"E
Q	34°21'41.56"S	20°37'39.41"E

Please note:

Where numerous properties/sites are involved (e.g. linear activities), attach a list of property descriptions and street addresses to the consultation form.

Figure 2: Co-ordinates of activities (Note D1 adjacent to C – location indicated by red arrow)

Street address:	Farm Melkhoutrivier (RE/P1 of Farm 492) approximately 2.5km east of Malgas on the way to Infanta on the Malgas Infanta Road Nr 268.		
Magisterial District or Town:	Swellendam		
Closest City/Town:	Malgas	Distance	2.5(km)
Zoning of Property:	Agriculture		

Please note:

In instances where there is more than one zoning applicable, please attach a list or map of the properties indicating their respective zoning to the Application Form.

Was the property rezoned after commencement of activities?	YES	**NO X**
If yes, what was the previous zoning?		
Is a rezoning application required?	YES	**NO X**
Is a consent use application required?	**YES X**	NO
Locality map:	A locality map must be attached to the Application Form as an appendix. The scale of the locality map must be at least 1:50 000. For linear activities of more than 25 kilometres, a smaller scale e.g. 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend;	

	• the prevailing wind direction; and • GPS co-ordinates (Indicate the position of the proposed activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates should be in degrees and decimal minutes. The minutes should have at least three decimals to ensure adequate accuracy. The projection that must be used in all cases is the WGS-84 spheroid in a national or local projection)
Landowner(s) Consent:	If the applicant is not the owner or person in control of the land on which the activity has been undertaken, he/she must obtain written consent from all landowners or persons in control of the land (of the site and all alternative sites). This must be attached to this document as Appendix G. Such consent must indicate whether or not the owner or person in control of the land would support approval of the application and that the land need not be rehabilitated. **Note:** The consent of the landowner or person in control of the land is not required for: a) linear activities; b) an activity directly related to prospecting or exploration of a mineral and petroleum resource or extraction and primary processing of a mineral resource; or c) strategic integrated projects ("SIPs") as contemplated in the *Infrastructure Development Act, 2014 (Act No. 23 of 2014)*.

2. APPLICATION HISTORY

(Cross out the appropriate box "☒" and provide a description where required).

Has any national, provincial or local authority considered any development applications on the property previously?	Yes	**No X**
If so, please give a brief description of the type and/or nature of the application/s as well as a reference number, if applicable: (In instances where there was more than one application, please attach a list of these applications)		
The following notices were issued (**Appendix J**): • DEA&DP Environmental Law Enforcement Pre-directive issued on 9 February 2022 • DEA&DP Environmental Law Enforcement Pre-compliance notice issued on 9 February 2022 • The BGCMA Pre-directive issued on 25 May 2021 • DEA&DP Rectification Pre-Directive issued on 5 July 2024 • Latest communication from DEA&DP		
Which authority considered the application:		
The WULA has been issued by BOCMA. Refer Appendix M1 for WARMS.		
Has <u>any</u> one of the previous application/s on the property been approved **or** refused? If so provide a list of the successful and unsuccessful application/s and the reasons for decision(s).	Yes	**No X**
Provide detail on the period of validity of decision and expiry dates of the above applications/ permits etc.		

SECTION B: ACTIVITY INFORMATION

1. ACTIVITIES APPLIED FOR

I hereby apply in terms of section 24G of the National Environmental Management Act (Act 107 of 1998) for the regularisation of the unlawful commencement or continuation of the listed or waste management activities as specified in Section B:1 below.

Applicant (Full names): JJ Booysen **Signature:** _____

Place: Somerset West **Date:** 08.09.2025

EAP (Full names): Amanda Fritz-Whyte **Signature:** Amanda Fritz-Whyte

Place: Paarl **Date:** 10 Sept 2025

All listed activities associated with the development must be indicated below.

1.1 Applicable EIA listed activities

ECA EIA Contraventions: between 08 September 1997 and end of 09 May 2002			
Activities commenced with on or after 08 September 1997 and before end 09 May 2002: EIA regulations promulgated in terms of the ECA, Act 73 of 1989			
Government Notice No. ("GN") R1182 Activity No(s):	Describe the relevant listed activity/ies in writing as per GN No. 1182 of 1997	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
ECA EIA Contraventions: between 10 May 2002 and end of 02 July 2006			
Activities unlawfully commenced with on or after 10 May 2002 and before end 02 July 2006: EIA regulations promulgated in terms of the ECA, Act 73 of 1989,			
NEMA EIA Contraventions: between 03 July 2006 and end of 01 August 2010			
Activities unlawfully commenced with on or after 03 July 2006 and before end 01 August 2010: EIA regulations promulgated in terms of the NEMA			
GN R386 Activity No(s): **(Listing Notice 1 of 2006)**	Describe the relevant listed activity/ies in writing as per GN No. R. 386 of 2006 ("NEMA 2006 Basic Assessment listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
Government Notice No. R387 Activity No(s): **(Listing Notice 2 of 2006)**	Describe the relevant listed activity/ies in writing as per GN No. R. 387 of 2006 ("NEMA 2006 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
NEMA EIA Contraventions: between 02 August 2010 and end of 07 December 2014			
Activities unlawfully commenced with on or after 02 August 2010 and before end 07 December 2014: EIA regulations promulgated in terms of the NEMA, Act 107 of 1998,			
GN No. R. 544 Activity No(s): **(Listing Notice 1 of 2010)**	Describe the relevant listed activity(ies) in writing as per GN No. R. 544 of 2010 ("NEMA 2010 Basic Assessment listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity

GN No. R. 545 Activity No(s): **(Listing Notice 2 of 2010)**	Describe the relevant listed activity/ies in writing as per GN No. R. 545 of 2010. (NEMA 2010 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
GN No. R. 546 Activity No(s): **(Listing Notice 3 of 2010)**	Describe the relevant listed Activity(ies) in writing as per GN No. R. 546 of 2010	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
4	The construction of a road wider than 4m with a reserve less than 13.5m Western Cape: ii. All areas outside urban areas.	A road was constructed on the eastern perimeter fenceline in 2011 (by a previous owner) of width approximately 5m and length approximately 1050m. It was maintained as an access road and firebreak road until 2022 when it was extended to the property boundary and widened to serve as a servitude road for access to landowners along the river.	September 2011
NEMA EIA Contraventions: on or after 08 December 2014			
Activities unlawfully commenced with on or after 08 December 2014: EIA regulations promulgated in terms of the NEMA, Act 107 of 1998,			
GN No. R. 983 Activity No(s): **(Listing Notice 1 of 2014)**	Describe the relevant listed activity(ies) in writing as per GN No. R.327 of 2014 ("NEMA 2014 Basic Assessment listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
19	The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse; but excluding where such infilling, depositing, dredging, excavation, removal or moving— (a) will occur behind a development setback; (b) is for maintenance purposes undertaken in accordance with a maintenance management plan; (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or (e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.	The cleaning and expansion of Dam 1 and Dam 2, the vegetation clearance around the two dams and the work on the two dams and the building of the road over Dam 1's dam wall. Both Dam 1 and Dam 2 are instream dams and none of the exclusions of the listed activity apply.	2021/2022
26	Residential, retail, recreational, tourism, commercial or institutional developments of 1000 square metres or more, on land previously used for mining or heavy industrial purposes; excluding - (i) where such land has been remediated in terms of part 8 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental	A lodge is proposed, with a development footprint of approximately 1292m², majority of which is on disturbed land that was previously used as a quarry area.	**To still be developed.**

	Management: Waste Act, 2008 applies; or (ii) where an environmental authorisation has been obtained for the decommissioning or closure of such an industry in terms of this Notice or any previous NEMA notice; or (iii) where a closure certificate has been issued in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) for such land.		
27	The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for— (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.	The construction of the roads, expansion of dams, installation of solar dam pump, construction of cottages and the proposed new lodge will result in the clearing of more than 1ha of natural vegetation.	2021/2022
48	The expansion of— (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or (ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more; where such expansion occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding— (aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such expansion activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such expansion occurs within an urban area; or (ee) where such expansion occurs within existing roads, road reserves or railway line reserves.	The expansion of Dam 1 and Dam 2 triggers this listed activity as they are both in stream dams and none of the exclusions apply. Associated infrastructure to the dams include the Solar PV pump.	2021/2022
GN No. R. 984 Activity No(s): **(Listing Notice 2 of 2014)**	Describe the relevant listed activity(ies) in writing as per GN No. R.325 of 2014 ("NEMA 2014 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
GN No. R. 985 Activity No(s): **(Listing Notice 3 of 2014)**	Describe the relevant listed activity(ies) in writing as per GN No. R.324 of 2014	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
4	The development of a road wider than 4m with a reserve less than 13.5m. Western Cape ii Areas outside urban areas:	The construction of the access road to the dams required indigenous vegetation removal.	2021/2022

	aa) areas containing indigenous vegetation.		
6	The development of resorts, lodges, hotels, tourism or hospitality facilities that sleeps 15 people or more. Western Cape: i. Outside urban areas; (aa) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; or (bb) Within 5km from national parks, world heritage sites, areas identified in terms of NEMPAA or from the core area of a biosphere reserve; - excluding the conversion of existing buildings where the development footprint will not be increased.	The lodge is located within 5km from a World Heritage Site (Cape Floral Region of De Hoop Nature Reserve) and a Protected Area in terms of NEMPAA. The lodge is designed to sleep more than 15 people. The lodge will be likely to attract more visitors to the area rather than compete with accommodation provided by the De Hoop Nature Reserve.	**To still be developed.**
12	The clearance of an area of 300m^2 or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. Western Cape: i Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004.	The expansion of the fire break road, the construction of the access road, single track farm road and the landowner's cottages and parking/ utility building, are within endangered vegetation. The clearance around Dam 1 and Dam 2 is also within endangered vegetation. More than 300m^2 of indigenous vegetation has been removed.	2021/2022
14	The development of – (i) Dams or weirs, where the dam or weir, including infrastructure and water surface area exceeds 10m^2; or (ii) infrastructure or structures with a physical footprint of 10m^2 or more; where such development occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; Excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour. i. Western Cape i. Outside urban areas: (aa) A protected area identified in terms of NEMPAA, excluding conservancies; (bb) **National Protected Area Expansion Strategy Focus areas**; (cc) World Heritage sites; (dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority; (ee) Sites or areas listed in terms of international convention; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic	The most eastern landowner cottage is within 32m of the drainage line. Estimated 60m^2 within 32m of the drainage line, which is outside an urban area and within the National Protected Area Expansion Strategy Focus areas.	2021/2022

	biodiversity plans adopted by the competent authority or in bioregional plans; (gg) Core areas in biosphere reserves; or (hh) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined.		
23	The **expansion** of- (i) dams or weirs where the dam or weir is expanded by 10 square metres or more; or (ii) infrastructure or structures where the physical footprint is expanded by 10 square metres or more; where such expansion occurs – (a) within a watercourse; (b) in front of a development setback adopted in the prescribed manner; (c) or if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour. Western Cape i. Outside urban areas: (aa) A protected area identified in terms of NEMPAA, excluding conservancies; (bb) National Protected Area Expansion Strategy Focus areas; (cc) World Heritage Sites; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;	The expansion of the dams and associated infrastructure has expanded by more than a 10m² within 32m of a watercourse, outside an urban area and within the National Protected Area Expansion Strategy Focus areas, a Protected Area in terms of NEMPAA, and a World Heritage Site. As shown in the impact tables and description of impacts, the expansion of the infrastructure has not resulted in any unacceptable impacts.	2021/2022

Please ensure that you have provided the similarly listed activities if the listed activities were commenced before the period the EIA Regulations came into effect, i.e. before 08 December 2014.

1.2 Applicable Waste Management Activities **N/A**

List the relevant waste management activity/ies applied for:

Waste Management Activity Contraventions: On or after 03 July 2007 up to end of 28 November 2013			
Activities unlawfully commenced with in terms of GNR 718 of 03 July 2009 under the National Environmental Management Waste Act, Act 59 of 2008			
GN No. 718 – Category A Activity No(s):	Describe the relevant Category A waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity
GN No. 718 – Category B Activity No(s):	Describe the relevant Category B waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity

Waste Management Activity Contraventions: On or after 29 November 2013			
Activities unlawfully commenced with in terms of GNR 921 of 29 November 2013 under the National Environmental Management Waste Act, Act 59 of 2008,			
GN No. 921 - Category A Activity No(s):	Describe the relevant Category A waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity
GN No. 921 – Category B Activity No(s):	Describe the relevant Category B waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity

Please note:

The National Department of Environmental Affairs is the competent authority for activities regarded as hazardous waste. Such activities must be indicated as hazardous waste in the abovementioned lists.

Only those activities listed above shall be considered for authorisation. The onus is on the applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, an application for amendment or a new application for Environmental Authorisation will have to be submitted.

1.3 Activities listed similarly in terms of the EIA Regulations

Kindly indicate the listed activities in terms of the EIA Regulations that is listed similar to the unlawfully commenced activities. The descriptions provided below must clearly state why the activity/development is still similarly listed in terms of the EIA Regulations, 2014.

The similarly listed activities in terms of the EIA Regulations promulgated in terms of the NEMA, Act 107 of 1998,		
GN No. R. 327 Activity No(s): **(Listing Notice 1 of 2014)**	Describe the relevant listed activity(ies) in writing as per GN No. R.327 of 2014 ("NEMA 2014 Basic Assessment listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.
19	The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse; but excluding where such infilling, depositing, dredging, excavation, removal or moving— (a) will occur behind a development setback; (b) is for maintenance purposes undertaken in accordance with a maintenance management plan; (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or (e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.	The cleaning and expansion of Dam 1 and Dam 2, the vegetation clearance around the two dams and the work on the two dams and the building of the road over Dam 1's dam wall. Both Dam 1 and Dam 2 are instream dams and none of the exclusions of the listed activity apply.
26	Residential, retail, recreational, tourism, commercial or institutional developments of 1000 square metres or more, on land previously used for mining or heavy industrial purposes; excluding - (iv) where such land has been remediated in terms of part 8 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental Management: Waste Act, 2008 applies; or (v) where an environmental authorisation has been obtained for the decommissioning or	A lodge is proposed, with a development footprint of approximately 1292m², majority of which is on disturbed land that was previously used as a quarry area.

	closure of such an industry in terms of this Notice or any previous NEMA notice; or (vi) where a closure certificate has been issued in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) for such land.	
27	"The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for— (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan."	The construction of the roads, expansion of dams, installation of solar dam pump, construction of cottages and the proposed new lodge will result in the clearing of more than 1ha of natural vegetation.
48	The expansion of— (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or (ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more; where such expansion occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding— (aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such expansion activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such expansion occurs within an urban area; or (ee) where such expansion occurs within existing roads, road reserves or railway line reserves.	The expansion of Dam 1 and Dam 2 triggers this listed activity as they are both in stream dams and none of the exclusions apply. Associated infrastructure to the dams include the Solar PV pump.
GN No. R. 325 Activity No(s): **(Listing Notice 2 of 2014)**	Describe the relevant listed activity(ies) in writing as per GN No. R.325 of 2014 ("NEMA 2014 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.
GN No. R. 324 Activity No(s): **(Listing Notice 3 of 2014)**	Describe the relevant listed activity(ies) in writing as per GN No. R.324 of 2014	Describe the portion of the development as per the project description that relates to the applicable listed activity.
4	The construction of a road wider than 4m with a reserve less than 13.5m. Western Cape: ii. All areas outside urban areas.	A road was constructed on the northern perimeter fence line in 2011 (by a previous owner) of width approximately 5m and length approximately 1050m. It was maintained as an access road and firebreak road until 2022 when it was extended and widened to serve as a servitude road for access to landowners along the river.
6	The development of resorts, lodges, hotels, tourism or hospitality facilities that sleeps 15 people or more. Western Cape: Western Cape:	The lodge is located within 5km from a World Heritage Site (Cape Floral Region of De Hoop Nature Reserve) and a Protected Area in terms of NEMPAA. The lodge is designed to sleep more than 15 people. The lodge will be likely to attract

	ii. Outside urban areas; (aa) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; or (bb) Within 5km from national parks, world heritage sites, areas identified in terms of NEMPAA or from the core area of a biosphere reserve; - excluding the conversion of existing buildings where the development footprint will not be increased.	more visitors to the area rather than compete with accommodation provided by the De Hoop Nature Reserve.
12	The clearance of an area of 300m^2 or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. Western Cape: i Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004.	The expansion of the fire break road, the construction of the access road, single track farm road and the landowner's cottages and parking/ utility building, are within endangered vegetation. The clearance around Dam 1 and Dam 2 is also within endangered vegetation. More than 300m2 of indigenous vegetation has been removed.
14	The development of – (i) Dams or weirs, where the dam or weir, including infrastructure and water surface area exceeds 10m^2; or (ii) infrastructure or structures with a physical footprint of 10m^2 or more; where such development occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; Excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour. i. Western Cape i. Outside urban areas: (aa) A protected area identified in terms of NEMPAA, excluding conservancies; (bb) **National Protected Area Expansion Strategy Focus areas**; (cc) World Heritage sites; (dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority; (ee) Sites or areas listed in terms of international convention; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; (gg) Core areas in biosphere reserves; or (hh) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined.	The most eastern landowner cottage is within 32m of the drainage line. Estimated 60m^2 within 32m of the drainage line, which is outside an urban area and within the National Protected Area Expansion Strategy Focus areas.
23	The **expansion** of-	The expansion of the dams and associated infrastructure has expanded by more than a 10m² within 32m of a watercourse, outside an urban area and within the National Protected Area

	(iii) dams or weirs where the dam or weir is expanded by 10 square metres or more; or (iv) infrastructure or structures where the physical footprint is expanded by 10 square metres or more; where such expansion occurs – (d) within a watercourse; (e) in front of a development setback adopted in the prescribed manner; (f) or if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour. Western Cape" ii. Outside urban areas: (aa) A protected area identified in terms of NEMPAA, excluding conservancies; (bb) National Protected Area Expansion Strategy Focus areas; (cc) World Heritage Sites; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;	Expansion Strategy Focus areas, a Protected Area in terms of NEMPAA, and a World Heritage Site. As shown in the impact tables and description of impacts, the expansion of the infrastructure has not resulted in any unacceptable impacts.

Please note:
Where approvals for the activity have been obtained in terms of any other legislation (e.g. National Water Act, Act 36 of 1998), certified copies of such approvals must be attached to this form.

NOTE: How is the lodge materially linked to the illegal commenced activities on site:
The dams were cleared and expanded on to provide water to planned activities on site. This includes providing water to game on site, irrigating previous dryland wheat area (crop change to lucern) and providing drinking water to the farm manager, workers, homeowner and lodge residents.

The firebreak road was constructed with a dual function – to provide protection against veldfires and to allow alternative access for residents along the river front so they would not have to use the old road adjacent to the proposed lodge site. The firebreak road is being registered as a servitude road for access to these landowners. Previously they used access across the farm, but this will be a security concern and a disturbance to animals on the farm within the new development. The lodge location is within an old quarry that has been in place since the 1980's.

The future new landowner has changed the farming activities on site over the last few years, from dryland wheat to game farming and proposes to use the lodge as a hunting lodge (during certain parts of the year) and general tourism lodge for the remainder of the year.

2. ACTIVITY DESCRIPTION

(Cross out the appropriate box "☒" and provide a description where required).

Is/are the activity(ies) complete or is/are the activity(ies) still to be completed?	Completed	**Incomplete X**
(a) Is/was the project a new development or an upgrade of an existing development? Also indicate the date (e.g. 2 August 2010) when the activity commenced as well as the original date of commencement if the application is an upgrade.	New	**Upgrade X**
See table below.		

Component	New or Upgrade	Dimensions	Vegetation removal (m²)	Vegetation conservation status at time of removal	Vegetation classification at present (as per Botanist)	Vegetation conservation status at present (as per Botanist)
Access road to dams	Upgrade. This section of road was developed to link with existing farm roads to provide easy access to the dams.	5m wide and 804m long	4 020	Activity occurred March 2021 to March 2022 at which time this vegetation was classified as Least threatened. Existing farm roads were developed prior to 2006.	Potberg Sandstone Fynbos	Least threatened
Single track farm road	New farm road to link access road to the dam area and over the dam wall.	3m wide and 500m long	1500	Activity occurred Aug 2019 to July 2020, at which time this vegetation was classified as Vulnerable.	Eastern Ruens Shale Renosterveld	Endangered
Expansion and clearance Dam 1	Upgrade	n/a	4 343	Activity occurred Aug 2019 to July 2020, at which time this vegetation was classified as Vulnerable. Dam was originally built in the 1960s	Eastern Ruens Shale Renosterveld	Endangered
Expansion and clearance Dam 2	Upgrade	n/a	1 685	Activity occurred July 2020 to March 2021 at which time this vegetation was classified as Vulnerable. Dam was originally built in the 1960s	Eastern Ruens Shale Renosterveld	Endangered
Firebreak road	New. A road was constructed on the eastern perimeter fence line in 2011, by a previous owner. It was maintained as an access road and firebreak road until 2022 when it was extended to the property boundary and widened to serve as a servitude road for access to landowners along the river.	5m wide and 1050m long	5250	Activity occurred in September 2011	Eastern Ruens Shale Renosterveld?	Endangered
Firebreak road new section	Upgrade	250m long and 4.8m wide	1200	The original road was constructed in September 2011, by a previous owner. The expansion activity occurred March 2022 at which time this vegetation was classified as part Critically Endangered and part Endangered.	Eastern Ruens Shale Renosterveld	Endangered
Solar pump used for pumping	New	Less than 100m²	Less than 100m²	Activity occurred Aug 2019 to July 2020, at which time this vegetation was classified as Vulnerable.	Eastern Ruens Shale Renosterveld	Endangered

water to and from dams.						
Landowner's cottages and parking / utility building and clearance around it	New	Total disturbance of 2700m²	2700m²	Activity occurred from April 2021 to October 2022 at which time this vegetation was classified as Endangered.	Judging by satellite imagery the site appears to have been at least partly disturbed in 2021 and was possibly burned in about 2019. Assuming that the site has been disturbed the indigenous plant diversity in the proposed footprint is now likely to be low, with no plant SoCC, and the botanical sensitivity is likely to be Low	
Lodge	New. Still to be developed.	Development footprint is roughly 1292m²	Area is largely disturbed consisting of alien vegetation. Approximately 485.5m² of vegetation will be removed.	Still to be developed.	The proposed lodge is located in an area that was fully disturbed prior to 2009, as can be clearly seen in satellite imagery. Most of the vegetation that has returned could in fact be rooikrans (*Acacia cyclops*), a highly invasive woody species very common in the area.	

(b) Clearly describe the activity and associated infrastructure commenced with, indicating what has been completed and what still has to be completed.

Proposed activity that has not commenced:

Building of a proposed lodge measuring approximately 1292m² in extent, within the old quarry and natural area in the northeastern section of the farm.

The following services are proposed for the new lodge:

Water: The expansion of the two dams allows for the site to be self-sufficient in terms of water needs on site. The dams are filled via natural flow during the raining season and a spring. The lodge will be supplied with water from these dams. Water will be treated to SANS drinking water standards. A filtration system will be installed to treat the water.

Electricity: The current ESKOM supply won't be able to supply the Lodge, and the costs to develop the ESKOM supply to the site is not considered economically viable. The Lodge will be supplied with solar power. The solar panels will be placed on the roof of the proposed lodge. The lodge will also be fitted with gas geysers and gas stoves to reduce reliance on solar power.

Sewage disposal: The DEA&DP requested that input be obtained from BOCMA with regards to the proposed dual septic tank system that was originally proposed for the lodge. BOCMA indicated that conservancy tanks are preferred over septic tanks. The lodge will therefore install a 10 000-litre conservancy tank to deal with the sewage generated at the lodge. The Applicant or owner of the lodge will be responsible for the regular servicing of the conservancy tank.

Waste: The general waste will be sorted into recyclables and non-recyclables and removed by the Applicant to the Municipal dump site near Diepkloof. The Municipality will remove the waste from the dump site to a registered landfill site. The estimated domestic waste produced by the proposed lodge will be minimal.

Activities completed on site:

- Clearing of vegetation to create access road to dams as well as the single-track roads adjacent to the dams.
- Clearing vegetation in the vicinity of existing dams and the expansion of two existing dams
- Establishment and expansion of a firebreak road/ servitude road on eastern boundary. This involved the clearing of vegetation. The road provides access to other private residential dwellings located adjacent to the Breede River. In addition, the road acts as a firebreak to veldfires.
- Construction of 2 new landowner's cottages of 150m² each and a parking/ utility building of 160m². This involved the clearing of 2700m² natural vegetation. These landowner's cottages are supplied with water via the two dams. They are supplied with electricity from an existing Eskom electrical point. The intention is to use solar energy in the future. Solar panels will be placed on the roof of each cottage. Each cottage has a septic tank to dispose of sewage. All general waste will be removed by the landowner to the nearest registered landfill site.
- Installation of a solar pump adjacent to the dam to pump water from the dams. This solar pump measures less than 100m² in extent.

(c) Please provide details of all components of the activity and attach diagrams (e.g. architectural drawings or perspectives, engineering drawings, process flow charts etc.).

Buildings	**YES X**	NO

Provide brief description:

A new guest lodge is proposed in the northeastern section of the property. The main component of the lodge will be located within an old quarry that was previously used as a campsite. A raised walkway will lead from the main lodge to 5 separate cottages. This area seems to have been disturbed in the past. The raised walkway will minimise disturbance to any natural vegetation.

The Applicant intents to move away from dryland wheat farming to game farming. The proposed lodge will be used as a hunting lodge during hunting season and for the remainder of the year it will be used for general tourism. The lodge is planned to accommodate 20 guests. The approved Game Management Plan is attached as **Appendix O**.

The development footprint of the lodge measures approximately 1292m² in extent. Since the lodge is predominately located within a disturbed quarry site, it is estimated that roughly 485,5m² of vegetation will be lost during the construction. It is likely to be less since this area is very disturbed and alien vegetation is dominant in this area.

The concept plans for the lodge are included in Appendix B. These plans will be finalised by the Architect after the Public Participation Process and prior to the building plan submission.

The Applicant has constructed two cottages measuring 150m² each, for himself and his son, and a parking/ utility building of 160m². The construction of these cottages entailed the clearance of 2700m² natural vegetation. Refer to Appendix B for the location of these units.

The following structures are currently on site:

- Foreman's cottage
- Worker's cottage
- 2 new cottages and a parking / utility building for the Applicant (part of this application)
- Store
- Dwelling with swimming pool

Structures to be removed:

- Glamping facilities including all tents

Infrastructure (e.g. roads, power and water supply/ storage)	**YES X**	NO

Provide brief description:

Clearance of indigenous vegetation for the construction of the access road to the dams and the firebreak/servitude road on eastern boundary.

The dam access road was constructed to link two existing farm roads which provided easier access to the dam. This road is a typical gravel farm road that is 5m wide and 408m in length. In addition, a single-track farm road was cleared to access the dams which links to existing farm roads over the dam wall. Refer to the Site Plans in Appendix B.

The firebreak road was constructed with a dual function – to provide protection against veldfires and to allow alternative access for private residents along the Breede River front so they would not have to use the old road adjacent to the proposed lodge site. The road is being registered as a servitude road for access for these landowners. In the past, they used access roads across the farm, but this will be a security concern and a disturbance to animals on the farm within the new development.

The firebreak road was created in 2011, by a previous owner and not the Applicant, and measures 5m in width and approximately 1050m long. This road was further extended in 2021/2022 towards the river and measures 4.8m wide and 250m long. The road is a gravel road. Refer to the Site Plans in Appendix B.

There are two existing dams on site. The date of construction of these dams are unknown.

According to the Freshwater Specialist, the earliest available imagery of the site, taken in 1942 (see Figure 13 in the Aquatic Report attached as Appendix H3) shows the site prior to much activity in the area. Instream wetland habitat extended up to the spring, just upstream of the two dams. It does appear as if there was some disturbance/excavation at or near the two dam sites. Figure 14 in the Aquatic Report attached as Appendix H3 shows the site in 1967, cultivation of the flat areas adjacent to the watercourses had all been cultivated. Disturbance at or near the two dam sites is visible. The same cultivation areas are visible in the 2005 image (see Figure 15 in the Aquatic Report attached as Appendix H3.). The disturbance at the two dam sites is not as visible but still appears to be present. There had also been a significant clearing of wetland habitat in the lower river system. The Google Earth images shown in Figures 16 and 17 in the Aquatic Report attached as Appendix H3 show the site before and after the works were undertaken on the two dams. The surrounding cultivation areas have remained the same however new roads have been constructed to the dams, the area around the dams cleared and the dam basins excavated.

According to the Hydrologist, the existence of the dams is evident in excavations at these sites on aerial photos of 1967.

According to the Botanist, the available satellite imagery from August 2019, prior to dam excavation and clearing, the vegetation in the sediment-filled dam footprints was dense (100% cover) and composed of 30-50% canopy cover of alien invasive species such as rooikrans (*Acacia cyclops*), black wattle (*Acacia mearnsii*) and Port Jackson (*Acacia saligna*). Open water was significantly less than it is now.

Areas surrounding the dams were cleared in 2021/2022 to harvest sand for the expansion of the dam walls. The storage capacities of the dams were enlarged, by means of removing/excavating material (silt, sediment and vegetation) from the dam basin and increasing the height of the dam walls. A road was constructed over the dam wall of Dam 1. The dams now have a combined capacity of approximately 4130m³.

The dams provide water to planned activities on site. This includes providing water to game on site, irrigating previous dryland wheat area (crop change to lucerne) and providing drinking water to the residential dwellings and lodge residents. Water will be treated to SANS drinking water standards. A filtration system will be installed to treat the water.

The dams are filled via an existing spring on site and natural runoff enters the dam during the rainfall season. The spring occurs adjacent to the watercourse, just upstream of Dam 2, at an altitude of about 42m above mean sea level. Low to no flow in

the watercourses in the area is between September and March, with flow mostly occurring from May to August. Dam 1 and Dam 2 are fed by the spring and have flow into and out of them throughout the year. The catchment of the watercourse is small (approximately 0.95km²). The estimated mean annual runoff for the catchment, based on the mean annual precipitation and runoff coefficient for the area, is approx. 120 000m³ /a.

The houses / cottages on site are currently on ESKOM power supply, with the aim to be placed on solar supply.

The water from the dams is distributed via a solar pump. This solar pump measures less than 100m² and used solely for the pumping of water from the dam.

The new solar panels will be placed on the roofs of the cottages. The current ESKOM supply won't be able to supply the Lodge, and the costs to develop the ESKOM supply to the site is not considered economically viable. The Lodge will be supplied with solar power in the form of photovoltaic panels. The pv panels will be placed on the roof of the proposed lodge. The lodge will also be fitted with gas geysers and gas stoves to reduce reliance on solar power.

Refer to Appendix B Site Plans and the WARMS attached as Appendix M1.

Processing activities (e.g. manufacturing, storage, distribution)	YES	**NO X**
Provide brief description:		
Storage facilities for raw materials and products (e.g. volume and substances to be stored)		
Provide brief description	YES	**NO X**
Storage and treatment facilities for solid waste and effluent generated by the project	**YES X**	NO
Provide brief description		
Sewage disposal: The cottages each have a septic tank with a soak away. The DEA&DP requested that input be obtained from BOCMA with regards to the proposed dual septic tank system that was originally proposed for the lodge. BOCMA indicated that conservancy tanks are preferred over septic tanks. The lodge will therefore install a 10 000-litre conservancy tank to deal with the sewage generated at the lodge. The Applicant or owner of the lodge will be responsible for the regular servicing of the conservancy tank. **Waste:** The general waste will be sorted into recyclables and non-recyclables and removed by the Applicant to the Municipal dump site near Diepkloof. The Municipality will remove the waste from the dump site to a registered landfill site. The estimated domestic waste produced by the proposed lodge will be minimal.		

(d) Other activities (e.g. water abstraction activities, crop planting activities)	**YES X**	No
Provide brief description		
The dams are filled via the abstraction of water from the spring. The 5.5ha planted with lucerne as feed for the animals requires irrigation water. The WULA includes application for 39 500m³/annum for the irrigation water.		

3.PHYSICAL SIZE OF THE ACTIVITY

Indicate the physical spatial size of the activity as well as associated infrastructure (footprints):

Illegal activity description	**Dimensions**	**Vegetation removal (m²)**
Access road to dams	5m wide and 804m long	**4 020**
Single track farm roads	3m wide and 500m long	**1500**
Expansion and clearance Dam 1	n/a	**4 343**
Expansion and clearance Dam 2	n/a	**1 685**
Firebreak road new section	250m long and 4.8m wide	**1200**
New landowner's cottages	10 x 15 (for each)	**300 for cottages and 160 for parking/ utility building within total clearance area of 2700m²**
Parking / utility building	10 x 16	

m²

The development footprint of the proposed lodge will measure approximately **1292m²** in size.

Indicate the area that has been transformed / cleared to allow for the activity as well as associated infrastructure

Total area for activities completed is approximately **15 448m².**

Area for lodge still to be completed = **1292m²** of which only 485.5m² will result in the loss of vegetation

m²

4. SITE ACCESS

Was there an existing access road? The site has existing access roads; additional internal roads were constructed – details provided below	**YES X**	NO
If NO, what was the distance over which the new access road was built? Please indicate the length and width of the new road. The dam access road is 5m wide and 408m in length. The firebreak road was created in 2011 and measures 5m in width and approximately 1050m long. This road was further extended in 2021/2022 towards the river and measures 4.8m wide and 250m long. The single-track farm road to the dams and over the dam wall measures approximately 500m in total and the road is roughly 3m wide.	(Length) m (width) m	
Describe the type of access road constructed:		
The dam access road was constructed to link two existing farm roads which provided easier access to the dam. This road is a typical gravel surfaced farm road. Refer to the Site Plans in Appendix B. The firebreak road was constructed with a dual function – to provide protection against veldfires and to allow alternative access for residents along the river front so they would not have to use the old road adjacent to the proposed lodge site. The road is being registered as a servitude road for access for these landowners. In the past, they used access roads across the farm, but this will be a security concern and a disturbance to animals on the farm within the new development. Refer to the Site Plans in Appendix B. The single-track farm road links the access roads to the dams and other farm roads to the West of the dam. This is a typical gravel surfaced farm road.		

Please Note:
Indicate the position of the access road on the site plan (See Section 5 below)

5. SITE PHOTOGRAPHS - REFER APPENDIX D

Colour photographs of the site and its surroundings (taken of the site and from the site), both before (if available) and after the activity commenced, with a description of each photograph, must be attached to this application. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide past and recent aerial photographs. It should be supplemented with additional photographs of relevant features on the site. Date and source of photographs must be included. Photographs must be attached as an **appendix** to this form.
Please note:
Should the relevant photographs not be included in the application, the application may be deemed insufficient and further information in this regard will be requested.

6. APPLICABLE LEGISLATION, POLICIES AND/OR GUIDELINES

Please list all legislation, policies and/or guidelines that were or are relevant to this activity.

LEGISLATION	ADMINISTERING AUTHORITY	TYPE Permit/ license/ authorisation/comment	DATE (if already obtained):
Regulations relating to the procedure to be followed and criteria to be considered when determining an appropriate fine in terms of S24G (GN40994 dated 20 July 2017)	DEA&DP	For consideration	In progress
National Environmental Management Act 107 of 1998, as amended (NEMA)	DEA&DP	Environmental Authorisation	In progress
National Heritage Resources Act 25 of 1999 (NHRA)	HWC	Comment on NID	16 May 2023
National Water Act 36 of 1998 (NWA)	BOCMA	WULA	24 March 2025

POLICY/ GUIDELINES	ADMINISTERING AUTHORITY
Guidelines for EMP's (June 2015)	DEA&DP
Guidelines on Alternatives (March 2013)	DEA&DP
Guideline for involving Biodiversity Specialists in the EIA process (2005)	DEA&DP
Circular EADP 0028/2014: One Environmental Management System	DEA&DP
Western Cape Provincial Spatial Development Framework (PSDF) (2014)	DEA&DP
Guideline on Public Participation (2017)	DEA&DP
Guideline for involving a Heritage Specialist in an EIA process (2005)	DEA&DP
Guideline for the review of Specialist Input in the EIA process (June 2005)	DEA&DP
Guideline on Need and Desirability (2017)	DEA&DP
BGIS	SANBI
Swellendam SDF 2020	Swellendam Local Municipality
Swellendam Municipality IDP 2022-2027	Swellendam Local Municipality
Western Cape Land Use Planning Guidelines: Rural Areas (2019)	Western Cape Government Environmental Affairs

7. APPLICATIONS IN TERMS OF NEMA AND SPECIFIC ENVIRONMENTAL MANAGEMENT ACTS ("SEMAs")

If not specifically applied for in terms of this application, does the development require an application for a waste management license in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)?	YES	**NO X**
If yes, has an application been submitted to the licensing authority?	YES	NO
Does the proposed project require an application for a water use license in terms of the National Water Act, 1998 (Act No. 36 of 1998)?	**YES X**	NO
If yes, has an application been submitted to the licensing authority? The WULA has been issued. Refer Appendix M1.	**YES X**	NO
If no, please provide evidence of existing water use rights (if applicable) with this application form. An Existing Lawful Use has been submitted to BOCMA for the site and was confirmed as part of the WULA. Refer Appendix M1.		
Does the proposed project require an application for an atmospheric emissions license in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)?	YES	**NO X**
If yes, has an application been submitted to the licensing authority?	YES	NO
Does the proposed project require an application in terms of the National Environmental Management: Integrated Coastal Management Act ("NEM: ICMA")?	YES	**NO X**
If yes, has an application been submitted to the relevant competent authority?	YES	NO
If yes, provide more details of the application submitted/to be submitted in terms of the NEM: ICMA		

8. APPLICATIONS IN TERMS OF OTHER LEGISLATION

Is any permission, licence or other approval required in terms of any other legislation? (Please tick)	YES	**NO X**

If yes, please complete the table below:

Type of approval required (List the applicable legislation & approval required):	Name of the authority responsible for administering the applicable legislation	Application submitted (Yes / No)	Status of application (e.g. pending/ granted/ refused)

SECTION C: DESCRIPTION OF RECEIVING ENVIRONMENT

Site/Area Description

For linear activities (pipelines, etc.) as well as activities that cover very large sites, it may be necessary to complete copies of this section for each part of the site that has a significantly different environment. In such cases please complete copies of Section C and indicate the area which is covered by each copy No. on the site plan.

Section C Copy No. (e.g. 1, 2, or 3): **n/a**

1. THE GEOLOGICAL FORMATIONS UNDERLYING THE SITE (Tick the appropriate box)

GRANITE		QUARTZITE	
SHALE	**X**	DOLOMITE	
SANDSTONE	**X**	DOLERITE	
OTHER (specify)			

2. GRADIENT OF THE SITE

Indicate the general gradient of the site(s) (cross out the appropriate box).

Flat	Flatter than 1:10	**1:10 – 1:5 X**	Steeper than 1:5

3. LOCATION IN LANDSCAPE

Indicate the landform(s) that best describes the site (cross out ("☒") the appropriate boxes).

Ridgeline	Plateau	Side slope of hill/mountain	Closed valley	Open valley	Plain	**Undulating plain/low hills X**	Dune	Sea-front	Other
If other, please describe									

4. GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE

4.1 GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE (PRE-COMMENCEMENT)

Is the site(s) located on or near any of the following (cross out ("☒") the appropriate boxes)?

Shallow water table (less than 1.5m deep)	YES	**NO X**	UNSURE
Seasonally wet soils (often close to water bodies)	YES	**NO X**	UNSURE
Unstable rocky slopes or steep slopes with loose soil	YES	**NO X**	UNSURE
Dispersive soils (soils that dissolve in water)	YES	**NO X**	UNSURE
Soils with high clay content	YES	**NO X**	UNSURE
Any other unstable soil or geological feature	YES	**NO X**	UNSURE
An area sensitive to erosion	YES	**NO X**	UNSURE

4.2 GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE (POST-COMMENCEMENT)

Shallow water table (less than 1.5m deep)	YES	**NO X**	UNSURE
Seasonally wet soils (often close to water bodies)	YES	**NO X**	UNSURE
Unstable rocky slopes or steep slopes with loose soil	YES	**NO X**	UNSURE
Dispersive soils (soils that dissolve in water)	YES	**NO X**	UNSURE
Soils with high clay content	YES	**NO X**	UNSURE
Any other unstable soil or geological feature	YES	**NO X**	UNSURE
An area sensitive to erosion	YES	**NO X**	UNSURE

If any of the answers to the above are "YES" or "unsure", specialist input may be requested by the Department.

(Information in respect of the above will often be available at the planning sections of local authorities. Where it does not exist, the 1:50 000 scale Regional Geotechnical Maps prepared by Geological Survey may also be used).

NOTE: HYDROLOGICAL REPORT COMPLETED AS PART OF ASSESSMENT PROCESS – REFER APPENDIX H2

5. SURFACE WATER – Refer Freshwater Ecological Report Appendix H1

5.1 SURFACE WATER (PRE-COMMENCEMENT)

Indicate the surface water present on and or adjacent to the site and alternative sites (cross out ("☒") the appropriate boxes)?

Perennial River	**YES X**	NO	UNSURE
Non-Perennial River	**YES X**	NO	UNSURE
Permanent Wetland	**YES X**	NO	UNSURE
Seasonal Wetland	YES	**NO X**	UNSURE
Artificial Wetland	**YES X**	NO	UNSURE
Estuarine / Lagoonal wetland	YES	**NO X**	UNSURE

5.2 SURFACE WATER (POST-COMMENCEMENT)

Indicate the surface water present on and or adjacent to the site and alternative sites (cross out ("☒") the appropriate boxes)?

Perennial River	**YES X**	NO	UNSURE
Non-Perennial River	**YES X**	NO	UNSURE
Permanent Wetland	**YES X**	NO	UNSURE
Seasonal Wetland	YES	**NO X**	UNSURE
Artificial Wetland	**YES X**	NO	UNSURE
Estuarine / Lagoonal wetland	YES	**NO X**	UNSURE

6. VEGETATION AND/OR GROUNDCOVER – REFER BOTANICAL REPORT APPENDIX H3

Please note: The Department may request specialist input/studies depending on the nature of the biodiversity occurring on the site and potential impact(s) of the activity/ies. To assist with the identification of the biodiversity occurring on site and the ecosystem status consult http://bgis.sanbi.org.za or BGIShelp@sanbi.org.za. Information is also available on compact disc ("cd") from the Biodiversity-GIS Unit, Ph (021) 799 8738. This information may be updated from time to time and it is the applicant/ EAP's responsibility to ensure that the latest version is used. A map of the relevant biodiversity information (including an indication of the habitat conditions as per (b) below) and must be provided as an overlay map to the property/site plan as an **appendix** to this form.

6.1 VEGETATION AND/OR GROUNDCOVER (PRE-COMMENCEMENT)

Cross out ("☒") the block **and** describe (where applicable) the vegetation types / groundcover present on the site before commencement of the activity.

Indigenous Vegetation - good condition		**Indigenous Vegetation with scattered aliens**	**X**	**Indigenous Vegetation with heavy alien infestation**	**X**
Describe the vegetation type above:		Describe the vegetation type above: The areas adjacent to Dam 1 and Dam 2 where soil was harvested for the enlarged dam walls cover about 0.65ha in total (including dam walls), and these were in areas that had not been previously cultivated, and they thus probably supported largely natural vegetation. Prior to dam excavation and clearing, the vegetation in the sediment-filled dam footprints was		Describe the vegetation type above: Access road to dams: Traverses an area that has been aggressively invaded by alien shrubs such as rooikrans (Acacia cyclops) and Port Jackson (Acacia saligna). Firebreak road: This area was not specifically looked at whilst on site, but plant species diversity is clearly high in this area, with a range of soil types driving local habitat diversity. A mix of indigenous species observed around the dams and along the access road is expected, with at least two or three likely SoCC to be present in that area.	

	dense (100% cover) and composed of 30-50% canopy cover of alien invasive species such as rooikrans (Acacia cyclops), black wattle (Acacia mearnsii) and Port Jackson (Acacia saligna). Open water was significantly less than it is now.	Landowner's cottages and parking/utility building: Two new houses and a shed/utility building were built in 2023 on a north facing slope about 25m north of the edge of old cultivated lands. This area was not specifically looked at whilst on site, but judging by satellite imagery time series the site appears to have been natural vegetation until July 2020, and some sort of building footprint is evident there from March 2021, but it was then only about 300m^2 in extent. In 2023 two new houses and as shed/utility building were built here, and the total disturbance footprint enlarged to 2700m^2 (Cape Farm Mapper). The botanical diversity in most of this 0.27ha area was probably fairly high, there may have been one or two SoCC present, and the botanical sensitivity was likely to have been Medium to High. Dam 1 and 2- and single-track access roads: Judging by the available satellite imagery from August 2019, prior to dam excavation and clearing, the vegetation in the sediment-filled dam footprints was dense (100% cover) and composed of 30-50% canopy cover of alien invasive species such as rooikrans (Acacia cyclops), black wattle (Acacia mearnsii) and Port Jackson (Acacia saligna). Open water was significantly less than it is now. Indigenous species likely included those still present above and below the dams, such as Morella serrata, Osteospermum moniliferum, Nidorella ivifolia, Searsia lucida, Gymnosporia buxifolia, Cotula coronopifolia, Fuirena spp., Athanasia 28rifurcate, Cyperus textilis, Isolepis costata, Aizoon africanum, and Cyperus spp. From a botanical perspective the sensitivity would have been moderate (having been the site of previous disturbance when the dams were constructed), and no plant Species of Conservation Concern (SoCC) are likely to have been impacted by dam clearing within the wetland areas. Proposed Lodge: The proposed lodge is located in an area that was fully disturbed prior to 2009, as can be clearly seen in satellite imagery. Most of the vegetation that has returned could in fact be rooikrans (*Acacia cyclops*), a highly invasive woody species very common in the area. Indigenous plant species diversity is likely to be low, given the previous soil disturbance, and no plant SoCC are likely. The botanical sensitivity of the proposed footprint area is Low.
Provide ecosystem status for above:	Provide ecosystem status for above: Cleared areas next to dams: Mapped as Potberg Ferricrete Fynbos (critically endangered), but rather closer to Eastern Ruens Shale Renosterveld (endangered).	Provide Ecosystem status for above: Access road to dams: Potberg Sandstone Fynbos (least threatened) Firebreak road: Eastern Ruens Shale Renosterveld Landowner's cottages: Potberg Ferricrete Fynbos Dam 1 and 2 and surrounding single track farm roads:

		Mapped as Potberg Ferricrete Fynbos (critically endangered), but rather closer to Eastern Ruens Shale Renosterveld (endangered). Proposed lodge: Most of the vegetation that has returned could in fact be rooikrans (*Acacia cyclops*), a highly invasive woody species very common in the area. Indigenous plant species diversity is likely to be low.
Indigenous Vegetation in an ecological corridor or along a soil boundary / interface	Veld dominated by alien species	Distinctive soil conditions (e.g. Sand over shale, quartz patches, limestone, alluvial deposits, termitaria etc.) – describe
Bare soil X (Quarry)	**Building or other structure X**	Sport field
Other (describe below)	**Cultivated land X**	Paved surface

(a) Highlight the applicable pre-commencement biodiversity planning categories of all areas on site and indicate the reason(s) provided in the biodiversity plan for the selection of the specific area as part of the specific category.

Systematic Biodiversity Planning Category				**If CBA or ESA, indicate the reason(s) for its selection in biodiversity plan**
Critical Biodiversity Area (CBA) X	Ecological Support Area (ESA) X	Other Natural Area (ONA) X	No Natural Area Remaining (NNR) X	The cleared areas around the dams are located within a CBA1 (terrestrial). Dam 1 is located within a CBA1 (terrestrial) and Dam 2 is located within a CBA1 (aquatic). The single-track farm road to the dams is within the CBA1 (terrestrial). The access road is partially located within an ONA while the rest of the road is in unmapped habitat. The fire break road is partially located within CBA2 and CBA1 (Terrestrial) and the extension of that road is within CBA2. The landowner's cottages are within CBA1 (terrestrial). The lodge is located within unmapped habitat, but the last guest unit slightly encroaches within an ESA2. The location of this unit must be set 32m back from the edge of any watercourse. Refer to Appendix E for the Biodiversity Map.

(b) Highlight and describe the habitat condition on site.

Habitat Condition	**Percentage of habitat condition class (adding up to 100%)**	**Description and additional Comments and Observations (including additional insight into condition, e.g. poor land management practises, presence of quarries, grazing/harvesting regimes etc).**
Natural	0%	
Near Natural (includes areas with low to moderate level of alien invasive plants)	0.0006%	0.65ha of areas cleared adjacent to Dam 1 and Dam 2
Degraded (includes areas heavily invaded by alien plants)	78.5%	The entire farm was heavily infested with alien vegetation before the new landowner took over and started removing alien vegetation from the drainage lines.

Transformed (includes cultivation, dams, urban, plantation, roads, etc)	21.5%	The farm was historically dryland wheat cultivation with small dams on site (approximately 216ha). There are several cottages and the current landowner's house. There are also 2 pans (approximately 14ha) on the portion of the farm across from the Infanta-Malgas Road, but this piece of the farm does not form part of this application.

(c) Complete the table to indicate:

(i) the type of vegetation, including its ecosystem status, that was previously present on the site; and

(ii) whether an aquatic ecosystem was previously present on site.

Terrestrial Ecosystems		**Aquatic Ecosystems**						
Ecosystem threat status as per the National Environmental Management: Biodiversity Act,2004 (Act No. 10 of 2004)	**Critical X**	Wetland (including rivers, depressions, channelled and un-channelled wetlands, flats, seeps pans, and artificial wetlands)			Estuary		Coastline	
	Endangered X							
	Vulnerable							
	Least Threatened	**YES X**	NO	UNSURE	YES	**NO X**	YES	**NO X**

(d) Please provide a description of the vegetation type and/or aquatic ecosystem present on site, including any important biodiversity features/information identified on site (e.g. threatened species and special habitats)

According to the Freshwater Ecological report:

AQUATIC FEATURES

Aquatic features on the property comprise a minor tributary of the lower Breede River and Estuary. The tributary originates in the foothills of the Potberg downslope of the gravel road to Infanta and flows in a northerly direction through the property. The stream is joined by several other streams before its drains into the Breede Estuary. Valley bottom wetland is mapped along the lower watercourse. Isolated depressions (Soutpan and Varsvlei) are mapped upstream of the gravel road to Infanta. See Figure 3.

Figure 3: .Orthophotograph taken in 2016 with the river systems associated with the property shown, as well as the location of the dams (Belcher, July 2023)

The tributary in which the dams have been constructed is fed by feeder streams draining the southern, lower slope of the Potberg Mountains. Several small streams drain into the two relatively large depression wetlands upslope of the gravel road to Infanta that do not appear to be linked to the small watercourse in which the dam has been constructed. There is a low ridge immediately downslope of the pans with little to no discernible overflow from the pans to the downslope watercourse. The watercourse is thus largely fed from several small springs located just upstream of the dams.

Downstream of the dams, largely a result of the relatively constant discharge of groundwater at the springs, seep and valley bottom wetlands occur. Historically the stream was likely a perennial stream, fed from groundwater, throughout the year except during very dry periods. Discharge measurements of the spring flow in October 2022 as part of the project assessment, during a relatively dry period, determined the flow from the springs to be in the order of about 18 m³ /day. The stream flows through agricultural areas where it has been more significantly impacted by past cultivation activities. Much of the valley bottom wetland and riparian vegetation is however still intact but has been invaded with alien vegetation such as rooikrans (Acacia cyclops), Port Jackson willows (Acacia saligna) and black wattle (Acacia mearnsii). The landowner is currently removing the alien vegetation from the watercourse.

Downstream of this, the stream is confined within a valley and is dominated by a valley bottom wetland area that is dominated by Phragmites australis reeds with clumps of the mat sedge, Cyperus textilis. Vegetation in the dam comprises bulrush (Typha capensis), with sedges such as Cyperus textilis and Isolepis prolifera occurring along the shallow margins.

Index of Habitat Integrity
The instream and riparian habitat integrity of the stream are considered to be moderately modified. This is due to the impact of the invasion of alien vegetation in the riparian zone as well as the flow and habitat modification associated with the dams.

Ecological Importance and Sensitivity (EIS)
The watercourse is considered of moderate ecological importance and sensitivity. The wetland habitat associated with the watercourse is sensitive to flow and water quality modification. The watercourse is also providing a link between the pan features on the foot of the Potberg as well as the De Hoop Nature Reserve.

The habitat is also likely to provide refuge to amphibians such as the clicking stream frog (*Strongylopus grayii*), Cape river frog (*Amietia fuscigula*), painted reed frog (*Hyperolius marmoratus*), southern dainty frog (Cacosternum australis) and raucous toad (*Sclerophrys capensis*). All of these species are listed as being of 'Least Concern' on the IUCN Red List of Threatened Species. It is unlikely that any fish species are present in the watercourse. Bird species such as cormorants (*Microcarbo africanus*), grey herons (Ardea cinerea), dabchicks (*Tachybaptus ruficollis*), and red bishops (*Euplectes orix*) were observed in the bulrushes on the dams.

Recommended Ecological Management Category
In terms of the proposed water resource classes for the Breede Gouritz Water Management Area, the Target Ecological Category for the downstream Breede River Estuary in DWS quaternary catchment H70H is a B category within a Class II (moderate protection and utilisation) integrated unit of analysis area (Lower Breede Renosterveld). The recommended ecological condition of the watercourse at the site is that it is maintained within the ecological category of B/C (largely natural/moderately modified). This could be achieved by removing the invasive alien vegetation within the corridor and ensuring the environmental flow requirements of the downstream aquatic ecosystem are maintained.

Environmental Water Requirements (EWR)
The watercourse in which the dams have been constructed is fed from surface water runoff as well as groundwater. The estimated runoff of the catchment is about 120 000m³/a with a groundwater contribution of more than 500m³/month. Given the high variability and uncertainty in the runoff, it is recommended that the environmental water requirement is rather expressed as a percentage of the flow where at least 25% of the flow entering the dams is allowed to continue downstream to feed the downstream wetland areas.

According to the Biodiversity/Botanical Impact Assessment Report:

VEGETATION

The vegetation map of South Africa indicates that two vegetation types are present in the area –Potberg Ferricrete Fynbos and Potberg Sandstone Fynbos, and the Botanist agrees with this broad classification, but also note that what could be classified as Eastern Ruens Shale Renosterveld (Endangered) is present in the river valleys and on the slopes (including in the areas impacted by the dams) but is not formally mapped as such. See Figure 4.

Potberg Ferricrete Fynbos is gazetted as Endangered (DEA 2011), but the latest analysis, as yet ungazetted, has downlisted it to **Vulnerable** (Skowno *et al* 2019). Both dams are located within what is formally mapped as this vegetation type, although based on the presence of exposed shale (rather than alluvium) the vegetation in the dam footprints is actually best classified as **Eastern Ruens Shale Renosterveld,** which is Endangered).

Potberg Sandstone Fynbos is is gazetted as **Least Threatened** (DEA 2011), and this is supported by the latest analysis, as yet ungazetted (Skowno *et al* 2019).

Dam 1 and 2- and Single-Track Farm Roads adjacent to dams
Judging by the available satellite imagery from August 2019, prior to dam excavation and clearing, the vegetation in the sediment-filled dam footprints was dense (100% cover) and composed of 30-50% canopy cover of alien invasive species such as rooikrans (*Acacia cyclops*), black wattle (*Acacia mearnsii*) and Port Jackson (*Acacia saligna*). Open water was significantly less than it is now. Indigenous species likely included those still present above and below the dams, such as *Morella serrata, Osteospermum moniliferum, Nidorella ivifolia, Searsia lucida, Gymnosporia buxifolia, Cotula coronopifolia, Fuirena* spp., *Athanasia trifurcata, Cyperus textilis, Isolepis costata, Aizoon africanum*, and *Cyperus* spp. From a botanical perspective the sensitivity would have been moderate (having been the site of previous disturbance when the dams were constructed), and no plant Species of Conservation Concern (SoCC) are likely to have been impacted by dam clearing within the wetland areas. The vegetation in the dam footprints now includes the above species, and drowned specimens of the alien trees noted above. The wetland fringing vegetation is representative of this habitat throughout the region.

The adjacent areas where soil was harvested for the enlarged dam walls cover about 0.65ha in total (including dam walls), and these were in areas that had not been previously cultivated, and they thus probably supported largely natural vegetation. The vegetation type in these shale areas is actually much closer to **Eastern Ruens Shale Renosterveld** (an Endangered unit) than the mapped Potberg Ferricrete Fynbos. Typical species observed in the nearby undisturbed areas include *Polygala fruticosa, Dicerothamnus rhinocerotis, Selago glutinosa, Berkheya rigida, Athanasia trifurcata, Phylica* sp., *Thesium* sp., *Aspalathus steudeliana, Ficinia gracilis, Oedera imbricata, Gnidia laxa, Helichrysum asperum, Anthospermum prostratum, Drimia capensis, Aspalathus spinosa, Carissa bispinosa, Asparagus aethiopicus, Cynodon dactylon, Eragrostis curvula, Senecio burchelii, Euclea acutifolia, Atriplex semibaccata, Aizoon africanum, Chrysocoma ciliata, Searsia lucida, Carpobrotus sp., Pelargonium grossularioides, Falkia repens, Hermannia lavandulifolia* and *Abutilon sonneratianum*.

Indigenous plant diversity and cover is recovering well in the previously scraped areas next to the dams and is currently about 60% of the adjacent undisturbed areas and is expected to progress to 80% within the next two years.

Access Roads
The access road skirts a low sandstone ridge and traverses an area that has been aggressively invaded by alien shrubs such as rooikrans (*Acacia cyclops*) and Port Jackson (*Acacia saligna*). The road is an average of 4-5m wide, and indigenous vegetation grows right up to the edge of the road, as does a lot of alien vegetation. Many of the same indigenous species as noted in Section 5.2.1 occur in this area, along with *Blepharis capensis, Lobostemon daltonii, Serruria ludwigii, Erica quadrangularis, Struthiola argentea, Microdon dubius, Metalasia brevifolia* and *Cliffortia stricta*.

Old, cultivated lands
These extensive areas are of no botanical conservation value, and are vegetated with a mix of weedy, secondary indigenous species (*Athanasia trifurcata, Cyndon dactylon, Helichrysum indicum, Ehrharta calycina, Arctotheca calendula)* and various exotic grasses and herbs (*Physalis viscosa, Echium plantagineum, Lolium, Trifolium angustifolium, Bromus* spp.).

Eastern Firebreak
This area was not specifically looked at whilst on site, but plant species diversity is clearly high in this area, with a range of soil types driving local habitat diversity. A mix of indigenous species observed around the dams and along the access road is expected, with at least two or three likely SoCC to be present in that area.

Proposed Lodge
The proposed lodge is located in an area that was fully disturbed prior to 2009, as can be clearly seen in satellite imagery. Most of the vegetation that has returned could in fact be rooikrans (*Acacia cyclops*), a highly invasive woody species very common in the area. Indigenous plant species diversity is likely to be low, given the previous soil disturbance, and no plant SoCC are likely. The botanical sensitivity of the proposed footprint area is Low.

Owner's cottages

Two new houses and a shed/utility building were built in 2023 on a north facing slope about 25m north of the edge of old cultivated lands. This area was not specifically looked at whilst on site, but judging by satellite imagery time series the site appears to have been natural vegetation until July 2020, and some sort of building footprint is evident there from March 2021, but it was then only about 300m^2 in extent. In 2023 two new houses and as shed/utility building were built here, and the total disturbance footprint enlarged to 2700m^2 (Cape Farm Mapper). The botanical diversity in most of this 0.27ha area was probably fairly high, there may have been one or two SoCC present, and the botanical sensitivity was likely to have been Medium to High.

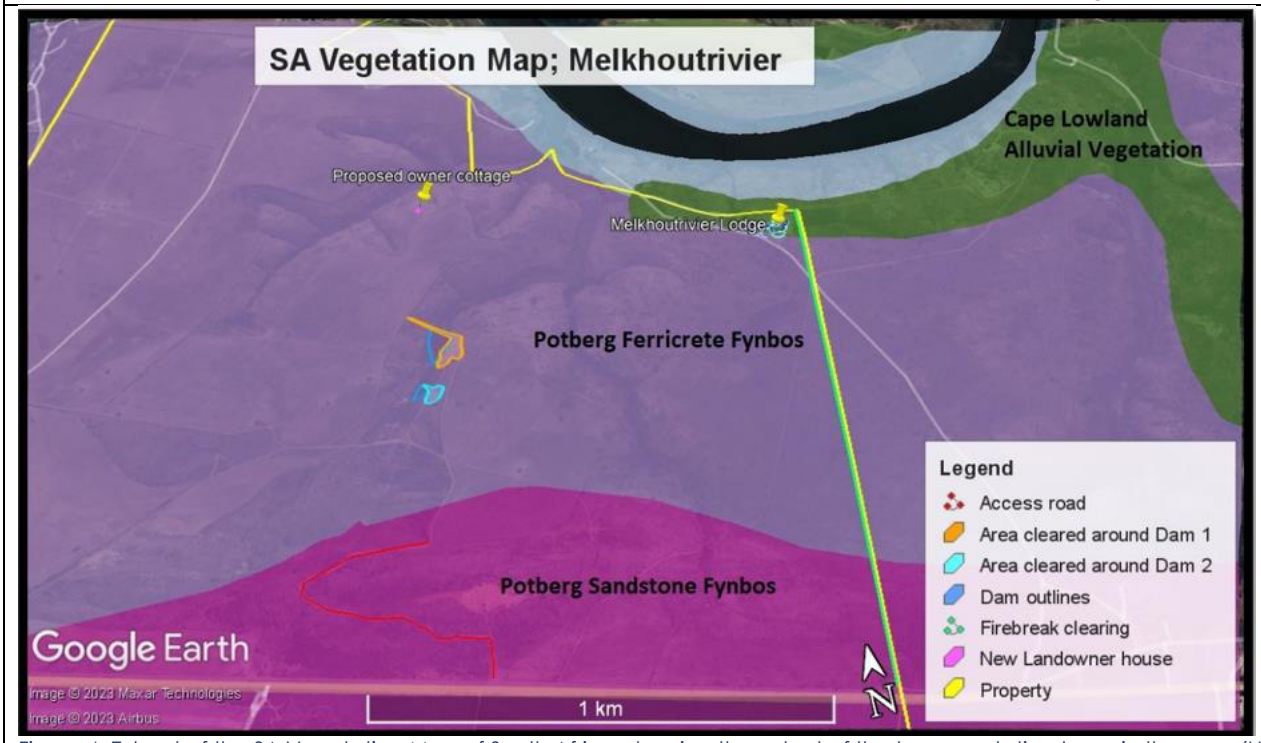


Figure 4: Extract of the SA Vegetation Map of South Africa, showing the extent of the two vegetation types in the area (Helme, September 2025)

Plant Species of Conservation Concern (SCC)

Table 1 is a list of the 3 plant Species of Conservation Concern (SCC) that were recorded from the study area footprints and immediately adjacent areas. This is a relatively low number of SCC and is indicative of the partly disturbed and alien invaded nature of much of the area. Many more SCC are likely to be present elsewhere on the greater property, but not within the specific study areas.

Table 1: Plant Species of Conservation Concern that were recorded from the dam and roads study area (Helme, November 2022)

Species	Redlist Status	Seen in recently cleared areas	Seen in undisturbed areas
Aspalathus steudeliana	Vulnerable	yes	yes
Hermannia lavandulifolia	Vulnerable	yes	yes
Lobostemon daltonii	Endangered	no	On sandstone outcrops next to track

Two of the three SCC (the *Aspalathus* and *Hermannia*) were commonly recorded in the recently cleared areas near the dams, with no SCC recorded exclusively in the cleared areas, indicating 1) that the disturbance caused by the clearing around the dams has not been significantly deleterious to most species and 2) that the cleared areas still have significant botanical value.

Aspalathus steudelina has an EOO of 12 000km^2 and its population on site (12 plants within 30m of the dams) is not among the largest 10 aggregations known for the species. The population of this species in the study areas (the disturbed areas and immediate surrounds) is regionally of low significance.

Hermannia lavandulifolia has an EOO of 12 000km^2 and its population on site (15 plants within 30m of the dams) is not among the largest 10 aggregations known for the species, which is still common in suitable habitat in much of the southern Cape. The population of this species in the study areas (the disturbed areas and immediate surrounds) is regionally of very low significance.

Lobostemon daltonii is a sandstone species and is locally quite common on sandstone outcrops, and may not have lost any individuals to the new access road, although this is impossible to retrospectively confirm. Its total known range is small (EOO of <20km^2), but its population on site (5 plants within 30m of the road) is not among the largest 10 aggregations known for the species. The population of this species in the study areas (the disturbed areas and immediate surrounds) is regionally of low to moderate significance.

The likelihood of there being undetected Species of Conservation Concern in the surveyed study areas on the property is deemed to be Low but is High in at least one of the unsurveyed study areas (the eastern firebreak) and Moderate for the cottages footprint area. Required buffer distances for the SoCC are not known, but as long as the ecosystem is still largely functional in the areas where these species occur (notably a natural fire regime with fire once every 10-15 years) no buffers should be required.

Overall conservation value (botanical sensitivity) of most of the undisturbed vegetation on the greater property is **High** at a regional scale, as these areas support good examples of mostly threatened vegetation types, and at least 10 plant Species of Conservation Concern, many of which are poorly conserved.

The actual dam footprints are likely to have been of **Moderate** botanical sensitivity prior to clearing, and the adjacent cleared terrestrial areas are still of **moderate to high botanical** sensitivity, as is most of the area through which the new access track is routed and as was the cottages footprint area.

The botanical sensitivity of the eastern firebreak area is likely to be **High**, whereas in the proposed lodge and owner's cottage area it is likely to be **Low.**

The conservation-oriented management of the High sensitivity vegetation on the greater property would materially contribute to meeting species and habitat conservation targets.

FAUNA

No significant faunal impacts are likely to have arisen as a result of the vegetation clearing next to the dams or in the road footprints, largely because the noise associated with such would have caused most of the fauna to vacate the area and move to suitable nearby habitat, which is still available. The clearing out of the dams would have temporarily disturbed the fauna in these areas, but appears to have recovered fully and quickly, as would be expected.

Birds observed on the dams include Reed Cormorant (*Microcarbo africanus*) and Dabchick (*Tachybaptus ruficollis*), and Red Bishops (*Euplectes orix*) were breeding in the reeds (*Typha capensis*) fringing the dams.

Four species of frogs (all common and widespread taxa) were heard calling in or near the dams – Cape Reed Frog (*Hyperolius marmoratus,* extralimital in this area), Cape River Frog (*Amietia fuscigula*), Clicking Stream Frog (*Strongylopus grayi*) and a Caco species (*Cacosternum* sp.). It would thus appear that the dam clearing activities had no significant negative impacts on frog populations, and a far more serious problem would be drying up of the spring that feeds these dams. This could potentially be caused by 1) increased and excessive abstraction of groundwater 2) sustained droughts and 3) ongoing alien invasive plant invasion. All three are potential and likely issues in the region, and indeed also in the vicinity of the study areas.

Two invertebrates were flagged by the Screening Tool. *Aneuryphymus montanus* (Yellow-winged Agile Grasshopper) is poorly known and seldom recorded, but seems to occur throughout the Overberg Ruens (2 observations on iNaturalist), and there is no way of saying – without a detailed survey by a specialist (capable of identifying it) in the appropriate season whether 1) the species occurs in the area and 2) whether it is likely to have been impacted by any of the activities in or around the dams, or is likely to be impacted elsewhere on site. Given the relatively small footprint of all the impacts assessed (compared to agriculture, the dominant driver of habitat transformation in the region) the impact on this species is likely to have been Low.

Chrysoritis brooksi teari (Brooks Opal) has also been flagged by the Screening Tool, and is a butterfly restricted to the Struisbaai to Stilbaai area, and may well occur in the study area. It larval foodplant *Roepera* and *Zygophyllum* are present in the area, and its larvae are dependent on *Crematogaster* ants, which are also present in the area. A specialist butterfly survey would be required to confirm its presence, but given the relatively small footprint of all the impacts assessed (compared to agriculture, the dominant driver of habitat transformation in the region) the impact on this species is likely to have been Low.

Eight bird SCC are flagged for this area by the Screening Tool, and seven of these could potentially occasionally occur in or close to the various study areas (all except *Hydroprogne caspia;* Caspian Tern), at various times, although only two these (*Circus maurus*, Black Harrier and *Afrotis afra*, Southern Korhaan) may occasionally breed within 200m of any of the study areas. None are likely to have been impacted in any significant, permanent way by the clearing activities, although had they been present at the time they would certainly have temporarily moved away. Consequently, the impact on bird SCC is likely to have been Low.

No faunal SoCC are likely to be permanently present with the proposed footprints for the lodge nor for the owner's cottages, but some may occasionally be present in the eastern firebreak area, but would not have been negatively impacted in the long term by the clearing of the firebreak. None of the proposed or existing development footprints would need specific buffers in order to mitigate further likely negative impacts on any of the faunal SoCC, largely because all the SoCC are highly mobile and can, and essentially do self-buffer, by moving to the most suitable habitats.

From the Hydrology Study:

HYDROLOGY

The catchment area that forms the subject of this study is very small covering 94.7ha in total. It constitutes a fraction of the larger Breede River catchment area covering some 12 384km^2, as a rather insignificant tributary.

Rainfall in this area is relatively low at an average of 465mm per annum resulting in low discharge volumes, however, due to the impermeable Bokkeveld shale substrate covering most of the drainage area not much rainfall is required to allow for surface runoff. As little as 6mm of rain over just a few hours result in flow into the non-perennial stream and beyond causing frequent flow episodes in the stream during above average rainfall events. The total discharge remains low due to a combination of low and infrequent rainfall episodes and small catchment area with an average discharge of <80 m^3 during normal rainfall episodes and up to just below 500m^3 during intense flood episodes.

The spring system is a unique phenomenon in this particular environment and the perennial, but seasonally fluctuating discharge being a significant contributor to the overall discharge in the drainage system under consideration. The discharge from the spring system even during a below average rain period exceeds that of a maximum flood event in the drainage system at some 534 m^3 per month.

Depth To Water Table

The regional groundwater table in the area is >30 mbgl., indicating that groundwater pollution probability with respect to the depth of the groundwater table is very low. However, as can be seen at the valley that forms part of this study valley incision has breached the groundwater table by exposing an aquifer. This bears testimony of the proximity of the very shallow water table in the valleys.

Net Recharge

The recharge rate in the area is 10 – 50 mm/a, thus, indicating that groundwater pollution probability with respect to recharge rate of the groundwater table is low.

Aquifer Media

The aquifer present in the area is classified as a fractured and weathered and intergranular aquifer. These fractures and weathered rock create preferential flow paths for groundwater which enables contaminants to infiltrate into the groundwater table.

Soil Media

The soil in the area is classified as sand to loamy sand which has a very high permeability, therefore may result in a high vulnerability.

Topography (Slope)

The slope in the area is between 2^0 - 18^0 indicating the vulnerability in relation to slope varies throughout the area.

Impact of the Vadose Zone

The geology consists of Table Mountain Group sandstone and quartzite and Bokkeveld Group sandstone and shale. The areas consisting of Bokkeveld shale has a low vulnerability, because of the impermeability of the shale, whereas the Table Mountain sandstone has a higher vulnerability because its higher permeability.

Hydraulic Conductivity

The geology and type of aquifer therefore determines the hydraulic conductivity, which in this case is a fractured and weathered and intergranular aquifer, thus the hydraulic conductivity is low to moderate, therefore decreasing the groundwater vulnerability.

Groundwater Vulnerability Conclusion

When assessing all the parameters of the DRASTIC method an overall groundwater vulnerability for an area can be derived. For the area under investigation the overall groundwater vulnerability is low to moderate.

6.2 VEGETATION AND/OR GROUNDCOVER (POST-COMMENCEMENT)

Cross out ("☒") the block **and** describe (where required) the vegetation types / groundcover present on the site after commencement of the activity.

Indigenous Vegetation - good condition		Indigenous Vegetation with scattered aliens		Indigenous Vegetation with heavy alien infestation	
Describe the vegetation type above:		Describe the vegetation type above:		Describe the vegetation type above:	
Provide ecosystem status for above:		Provide ecosystem status for above:		Provide Ecosystem status for above:	

Indigenous Vegetation in an ecological corridor or along a soil boundary / interface	Veld dominated by alien species	Distinctive soil conditions (e.g. Sand over shale, quartz patches, limestone, alluvial deposits, termitaria etc.) – describe
Bare soil X	**Building or other structure X**	Sport field
Other (describe below)	Cultivated land	Paved surface

(a) Highlight and describe the post-construction habitat condition on site.

Habitat Condition	Percentage of habitat condition class (adding up to 100%)	Description and additional Comments and Observations (Including additional insight into condition, e.g. poor land management practises, presence of quarries, grazing/harvesting regimes etc).
Natural	0%	
Near Natural (includes areas with low to moderate level of alien invasive plants)	0%	
Degraded (includes areas heavily invaded by alien plants)	78.5%	The entire farm was heavily infested with alien vegetation before the new landowner took over and started removing alien vegetation from the drainage lines.
Transformed (includes cultivation, dams, urban, plantation, roads, etc)	21.5%	The farm was historically dry wheat cultivation with small dams on site (approximately 216ha). There are several cottages and the current landowner's house. There are also 2 pans (approximately 14ha) on the portion of the farm across the Malgas- Infanta Road, but these do not form part of this application area.

(b) How have the vegetation and/or aquatic ecosystem(s) present on site (including any important biodiversity features identified on site (e.g. threatened species and special habitats)) been affected by the commencement of the listed activity(ies)?

The firebreak road and extension, new access roads to and around the dam, the owners cottages area, and the cleared areas around Dam 1 and Dam 2 required indigenous vegetation removal. This resulted in the loss of vegetation and fragmentation of the habitat. The dams have also not resulted in any significant impact on the flow in the associated watercourse.

6.3 VEGETATION / GROUNDCOVER MANAGEMENT

(a) Describe any mitigation/management measures that were adopted and the adequacy of these:

The site identified for the proposed lodge was identified due to the disturbed nature of the site which would avoid any potential impacts on natural vegetation. Furthermore, the walkways leading to the 10 guest cottages are raised to further limit and/or avoid the loss of natural vegetation. The intention is to use indigenous vegetation to landscape disturbed areas surrounding the proposed lodge. There is also an approx. 300 – 400mm outlet pipe in the dam wall that allows a constant release into the downstream watercourse during low flow conditions, with a second one at a slightly higher level that allows for further downstream flow releases in higher flow conditions.

7. LAND USE OF THE SITE (PRE-COMMENCEMENT)

Please note: The Department may request specialist input/studies depending on the nature of the land use character of the area and potential impact(s) of the activity/ies.

Untransformed area	Low density residential	Medium density residential	High density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	Medium industrial	Heavy industrial

Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	Tourism & Hospitality facility
Open cast mine	Underground mine	Spoil heap or slimes dam	**Quarry, sand or borrow pit X**	**Dam or reservoir X**
Hospital/medical centre	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	**Agriculture X**	**River, stream or wetland X**	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):				

(a) Please provide a description.

The farm was historically used for dryland wheat cultivation.
There are two old quarries on site. The northernmost quarry site is the proposed site for the lodge. This is an old quarry (established in the 1980's) and it was abandoned over time.
There are dams and drainage lines present on site.

8. LAND USE CHARACTER OF SURROUNDING AREA (PRE-COMMENCEMENT)

Cross out ("☒") the block that reflects the past land uses and/or prominent features that occur/red within +/- 500m radius of the site and neighbouring properties if these are located beyond 500m of the site. **Please note:** The Department may request specialist input/studies depending on the nature of the land use character of the area and impact(s) of the activity/ies.

Untransformed area	Low density residential	Medium density residential	High density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	Medium industrial	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	**Tourism & Hospitality facility X**
Open cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	**Dam or reservoir X**
Hospital/medical centre	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	**Agriculture X**	**River, stream or wetland X**	**Nature conservation area X**
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):				

9. LAND USE CHARACTER OF SURROUNDING AREA (POST-COMMENCEMENT)

Cross out ("☒") the block that reflects the current land uses and/or prominent features that occur(s) within +/- 500m radius of the site and neighbouring properties if these are located beyond 500m of the site. **Please note:** The Department may request specialist input/studies depending on the nature of the land use character of the area and impact(s) of the activity/ies.

Untransformed area	Low density residential	Medium density residential	High density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	Medium industrial	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	**Tourism & Hospitality facility X**
Open cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	**Dam or reservoir X**
Hospital/medical centre	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	**Agriculture X**	**River, stream or wetland X**	**Nature conservation area X**
Mountain, koppie or ridge X	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):				

10. SOCIO-ECONOMIC CONTEXT

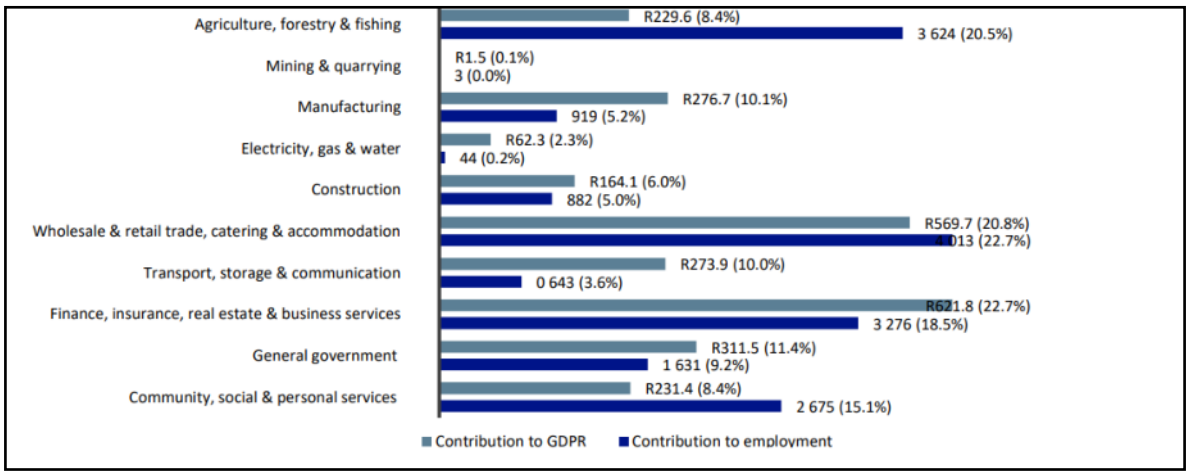
10.1 SOCIO-ECONOMIC CONTEXT (PRE-COMMENCEMENT)

Describe the pre-commencement social and economic characteristics of the community in order to provide baseline information.

The site is approximately 3.5km East of the rural area of Malgas on the Malgas-Infanta Road and was historically cultivated as a dryland wheat farm. The village of Malgas relies on seasonal tourism linked to the Breede River and seasonal employment within the agricultural sector.

Malgas as an historical settlement currently functions as a localised low order service centre to the farming community with a store and a rudimentary garage facility. The village is also an important tourist attraction in terms of the historical pond crossing, the Malgas Church, and other historical buildings. The Malgas guesthouse with its riverboat hire and other facilities provides a focus for tourists visiting this area. The topography, the Breede River corridor, and its remote location limit development opportunities within the area.

The below figure provides a breakdown of the Swellendam municipal area's sectoral contribution to employment and GDPR in 2019:



The main sources of GDPR contribution in the municipal area were from the finance, insurance, real estate and business services sector (22.7%) and the wholesale and retail trade, catering and accommodation sector (20.8%). The latter is also the predominant source of employment in the Swellendam municipal area, accounting for 22.7% of the area's total employment. The agriculture, forestry and fishing sector were the second-largest employer, contributing 20.5%to employment but only 8.4%to GDPR, indicating that this sector is highly labour-intensive. Within the Swellendam municipal area, formal employment accounted for 73% of total employment in the municipal area in 2019, while informal employment accounted for 27%. The wholesale and retail trade, catering and accommodation sector, as well as the transport, storage and communication sector, had the highest share of informal workers, accounting for 37.2% and 37.9% of total workers respectively.

10.2 SOCIO-ECONOMIC CONTEXT (POST-COMMENCEMENT)

Describe the post commencement social and economic characteristics of the community in order to determine any change. Where differences between pre- and post-commencement exist, state which are as a result of the activity(ies) for which rectification is being applied for.

The socio-economic characteristics of the community has not been affected by the commencement of activities, nor are any negative socio-economic changes anticipated as a result of the proposed activities on site.

Positive impacts related to the project include increase in temporary and permanent job opportunities during the construction and operational phase.

11. HISTORICAL AND CULTURAL ASPECTS

(a) Please be advised that every application for Environmental Authorisation including an application for a Waste Management Licence, must include, where applicable the investigation, assessment and evaluation of the impact of any proposed listed or specified activity on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), excluding the national estate contemplated in section 3(2)(i)(vi) and (vii) of that Act.

Please be further advised that if section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), is applicable to your application, then you are requested to furnish this Department with written comment from Heritage Western Cape as part of your public participation process. Section 38 of the Act states as follows: "*38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as-*

(a) the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;

(b) the construction of a bridge or similar structure exceeding 50m in length;
(c) any development or other activity which will change the character of a site-
(i) exceeding 5 000 m² in extent; or
(ii) involving three or more existing erven or subdivisions thereof; or
(iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
(iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;
(d) the re-zoning of a site exceeding 10 000 m² in extent; or
(e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development."

(b) The impact on any national estate referred to in section 3(2), excluding the national estate contemplated in section 3(2)(i)(vi) and (vii), of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), must also be investigated, assessed and evaluated. Section 3(2) states as follows: "*3(2) Without limiting the generality of subsection (1), the national estate may include—*
(a) places, buildings, structures and equipment of cultural significance;
(b) places to which oral traditions are attached or which are associated with living heritage;
(c) historical settlements and townscapes;
(d) landscapes and natural features of cultural significance;
(e) geological sites of scientific or cultural importance;
(f) archaeological and palaeontological sites;
(g) graves and burial grounds, including—
(i) ancestral graves;
(ii) royal graves and graves of traditional leaders;
(iii) graves of victims of conflict;
(iv) graves of individuals designated by the Minister by notice in the Gazette;
(v) historical graves and cemeteries; and
(vi) other human remains which are not covered in terms of the Human Tissue Act, 1983 (Act No. 65 of 1983);
(h) sites of significance relating to the history of slavery in South Africa;
(i) movable objects, including—
(i) objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens;
(ii) objects to which oral traditions are attached or which are associated with living heritage;
(iii) ethnographic art and objects;
(iv) military objects;
(v) objects of decorative or fine art;
(vi) objects of scientific or technological interest; and
(vii) books, records, documents, photographic positives and negatives, graphic, film or video material or sound recordings, excluding those that are public records as defined in section 1(xiv) of the National Archives of South Africa Act, 1996 (Act No. 43 of 1996)."

Is section 38 of the National Heritage Resources Act, 1999, applicable to the development?		**YES X**	NO	
		UNCERTAIN		
If YES, explain:	Triggers in terms of NEMA.			
	Refer Appendix M3 for copy of NID and Screener submitted to HWC.			
	Heritage Western Cape has responded that there are no further heritage studies required. Refer to Appendix M3.			
Did/does the development impact on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999?		YES	**NO X**	
		UNCERTAIN		
If YES, explain:				
Was any building or structure older than 60 years affected in any way?		YES	**NO X**	UNCERTAIN
If YES, explain:				

Please Note:
If uncertain, the Department may request that specialist input be provided. If, yes, a copy of the Notice of Intent submitted to Heritage Western Cape must be submitted with this form.

12. COASTAL ASPECTS (SEAFRONT/SEA ENVIRONMENT) – NOT APPLICABLE

(a) Is the site(s) located within any of the following areas? (highlight the appropriate boxes).
If the site or alternative site is closer than 100m to such an area, please provide the approximate distance in (m).

AREA	YES	NO	UNSURE	If "YES": Distance to nearest area (m)
An area within 100m of the high water mark of the sea	YES	**NO X**	UNSURE	
An area within 100m of the high water mark of an estuary/lagoon	YES	**NO X**	UNSURE	
An area within the littoral active zone	YES	**NO X**	UNSURE	
An area in the coastal public property	YES	**NO X**	UNSURE	
Major anthropogenic structures	YES	**NO X**	UNSURE	
An area within a Coastal Protection Zone	YES	**NO X**	UNSURE	
An area seaward of the coastal management line	YES	**NO X**	UNSURE	
An area within the high risk zone (20 years)	YES	**NO X**	UNSURE	
An area within the medium risk zone (50 years)	YES	**NO X**	UNSURE	
An area within the low risk zone (100 years)	YES	**NO X**	UNSURE	
An area below the 5m contour	YES	**NO X**	UNSURE	
An area within 1km from the high water mark of the sea	YES	**NO X**	UNSURE	
A rocky beach	YES	**NO X**	UNSURE	
A sandy beach	YES	**NO X**	UNSURE	

(b) If any of the answers to the above is "YES" or "UNSURE", specialist input may be requested by the Department. (The 1:50 000 scale Regional Geotechnical Maps prepared by Geological Survey may also be used).

13. REGIONAL PLANNING CONTEXT

Is the activity permitted in terms of the property's existing land use rights?	**YES X**	**NO X**	Please explain
The property is zoned as agricultural. The expansion and cleaning of the dams, the establishment of the road and firebreak, and the new landowner's cottages, were aimed at agricultural activities- thus are allowed within the property's existing land use rights.			
The proposed new lodge is aimed at tourism, for which a consent use application will be submitted for authorisation. Refer to the Motivational Report attached as Appendix H4.			
Will the activity be in line with the following?			
Provincial Spatial Development Framework (PSDF)	**YES X**	NO	Please explain
The Western Cape PSDF is a planning document that guides district and local spatial initiatives such as IDP's and SDF's. It aims to create a coherent framework for the province's urban and rural areas. The PSDF aims to guide the location and form of public investment in the Western Cape's urban and rural areas. Whilst it cannot influence private sector investment patterns, it has an important contribution in terms of reducing business risk by providing clarity and certainty on where public infrastructure investment will be targeted, thereby opening new economic opportunities in these areas. The current economic state with high levels of unemployment, especially amongst the youth, and recent job losses in agriculture all adds to the high levels of rural poverty and unemployment. The proposed project will create direct and indirect job opportunities during the construction phase, from which local and specialised labour will benefit. The proposed project will continue to provide labour opportunities in the agricultural sector during the operational phase and provide labour opportunities in the tourism sector during the operational phase.			
Urban edge / Edge of Built environment for the area	YES	NO	Please explain
NOT APPLICABLE - The site is outside the Urban edge			
Integrated Development Plan of the Local Municipality	**YES X**	NO	Please explain
The IDP encourages local economic development with a focus on increased employment opportunities.			
The proposed project will create direct and indirect job opportunities during the construction phase, from which local and specialised labour will benefit. The proposed project will continue to provide labour opportunities in the agricultural sector during the operational phase and provide labour opportunities in the tourism sector during the operational phase.			

The abstraction of water for irrigation from the dams will allow the irrigation of lucerne areas for feed to livestock thus diversifying the agricultural activities on site.

Spatial Development Framework of the Local Municipality	**YES X**	NO	Please explain

The Swellendam SDF is a component of the municipal IDP.
According to the SDF the topography, river corridor and remote location limit development opportunities in the Malgas area.

One of the principles of the SDF is the provision of employment opportunities and this proposed project will provide short term and long-term employment opportunities, within the agricultural and tourism sector.
The knock-on effect on local small-scale industries (tourism/ commercial/wineries) from the proposed project has positive potential for the area.

The SDF also recognises the need to conserve of sensitive biophysical environments, and that they should be managed with conservation objectives in mind. The riverine and estuarine environment of the Breede River and its tributaries are of particular importance.

The Western Cape Land Use Planning Guideline: Rural Areas (2019) guides all land use application outside the urban edges demarcated for urban settlements in the Swellendam SDF, and one of the objectives is to promote sustainable development in appropriate rural locations throughout the Western Cape and ensure the inclusive growth of the rural economy. The guideline recognises that the site lies within a CORE1 area, where the conservation of CBA Terrestrial and Aquatic take priority. Limited activities are proposed for these areas but include low impact land uses such as non-consumptive low impact eco-tourism activities, such as recreation and tourism (e.g., hiking trails, bird and game watching, and visitor overnight accommodation). Controlled livestock grazing and game farming must be informed by the habitat type, grazing potential and other site sensitivities. Tourism developments should have no adverse effects on society, natural systems and agricultural resources. The long-term impact on the municipality (resources and financial); water supply and demand; agricultural activities, production and sustainability, risk and finances; and the scenic, heritage and cultural landscape should be considered when decisions are taken.

The proposed project is well aligned with the guideline in that it will grow the rural economy through low impact tourism and game farming activities whilst not impacting on municipal resources and finances. Water supply is readily available on the farm and a sustainable source.

The proposed project will create direct and indirect job opportunities during the construction phase, from which local and specialised labour will benefit. There is also a knock-on benefit to local trade and tourism sector with expected additional revenue and indirect job creation. The proposed project will continue to provide direct labour opportunities in the agricultural and tourism sector during the operational phase.

It is expected that the proposal will create 20 permanent direct employment opportunities and 30 permanent indirect employment opportunities.

Approved Structure Plan of the Municipality	YES	NO	Please explain

Not applicable

An Environmental Management Framework (EMF) adopted by the Department	YES	**NO X**	Please explain

The EMF is integrated in the Swellendam Local Municipality SDF.

One of the key spatial challenges is the promotion of biodiversity conservation and sustainable environmental management based on bioregional planning objectives.

The cleared areas around the dams are mapped as CBA1 (terrestrial), with the lower dam area being a CBA1 (wetland) and the upper dam mapped as CBA1 (terrestrial). The access road to the dams passes through unmapped habitat, Other Natural Area (ONA), and a small section of CBA1. CBAs are Critical Biodiversity Areas, and should not be developed, lost or impacted, as they support critical habitat and species, and appropriate land uses should be low impact and biodiversity sensitive.

Any other Plans	YES	NO	Please explain

Not applicable

SECTION D: NEED AND DESIRABILITY

Please Note: Before completing this section, first consult this Department's *Guideline on Need and Desirability* (March 2013) available on the Department's website (**http://www.capegateway.gov.za/eadp**).

1. Was the activity permitted in terms of the property's land use rights at the time of commencement?	**YES X**	NO	Please explain
The property is zoned as agricultural. The expansion and cleaning of the dams, the establishment of the access roads and firebreak road, and the new landowner's houses, were aimed at agricultural activities- thus are allowed within the property's existing land use rights.			
The planned new lodge is aimed at tourism, for which a consent use application will be submitted for authorisation (Appendix H4). This activity has not commenced.			

2. Was the activity in line with the following?			
(a) Provincial Spatial Development Framework (PSDF)	**YES X**	NO	Please explain
The Western Cape PSDF is a planning document that guides district and local spatial initiatives such as IDP's and SDF's. It aims to create a coherent framework for the province's urban and rural areas. The PSDF aims to guide the location and form of public investment in the Western Cape's urban and rural areas. Whilst it cannot influence private sector investment patterns, it has an important contribution in terms of reducing business risk by providing clarity and certainty on where public infrastructure investment will be targeted, thereby opening new economic opportunities in these areas. The current economic state with high levels of unemployment, especially amongst the youth, and recent job losses in agriculture all adds to the high levels of rural poverty and unemployment. The proposed project will create direct and indirect job opportunities during the construction phase, from which local and specialised labour will benefit. There is also a knock-on benefit to local trade and tourism sector with expected additional revenue and indirect job creation. The proposed project will continue to provide direct labour opportunities in the agricultural and tourism sector during the operational phase. The Western Cape Land Use Planning Guideline: Rural Areas (2019) guides all land use application outside the urban edges demarcated for urban settlements in the Swellendam SDF, and one of the objectives is to promote sustainable development in appropriate rural locations throughout the Western Cape and ensure the inclusive growth of the rural economy. The guideline recognises that the site lies within a CORE1 area, where the conservation of CBA Terrestrial and Aquatic take priority. Limited activities are proposed for these areas but include low impact land uses such as non-consumptive low impact -tourism activities, such as recreation (e.g., hiking trails, bird and game watching, and visitor overnight accommodation). Controlled livestock grazing and game farming must be informed by the habitat type, grazing potential and other site sensitivities. Tourism developments should have no adverse effects on society, natural systems and agricultural resources. The long-term impact on the municipality (resources and financial); water supply and demand; agricultural activities, production and sustainability, risk and finances; and the scenic, heritage and cultural landscape should be considered when decisions are taken. The proposed project is well aligned with the guideline in that it will grow the rural economy through low impact tourism and game farming activities whilst not impacting on municipal resources and finances. Water supply is readily available on the farm and a sustainable source.			
(b) Urban edge / Edge of Built environment for the area	YES	NO	Please explain
Not applicable – the site is outside of the urban edge			
(c) Integrated Development Plan and Spatial Development Framework of the Local Municipality (e.g. would the approval of this application have compromised the integrity of the existing approved and credible municipal IDP and SDF?).	**YES X**	NO	Please explain
The Swellendam SDF is a component of the municipal IDP. From the SDF it is clear that agricultural development should be encouraged as it is the economic sector that provides the most employment opportunities in the municipal area. Agriculture is also one of the largest economic activities in the municipal area. The IDP also encourages local economic development with a focus on increased employment opportunities, which is one of the consequences of this proposed project. The proposed project supports both the agricultural (game farming) sector and the tourism sector.			
(d) Approved Structure Plan of the Municipality	YES	NO	Please explain **X**

Agriculture is one of the largest economic activities in the municipal area and the Swellendam SDF and IDP encourages further agricultural development.

The proposed project does not link to the infrastructure plan for the municipality in terms of water and sanitation, as these services are provided on-site. Waste is sorted on site and taken to the local dump site for collection and disposal by the municipality.

The Malgas solid waste facility is limited to general waste, building and green waste.

(e) An Environmental Management Framework (EMF) adopted by the Department (e.g. Would the approval of this application have compromised the integrity of the existing environmental management priorities for the area and if so, can it be justified in terms of sustainability considerations?)	**YES X**	NO	Please explain
The EMF is integrated in the Swellendam Local Municipality SDF. One of the key spatial challenges is the promotion of biodiversity conservation and sustainable environmental management based on bioregional planning objectives. The previous dryland wheat cultivation is not sustainable and with water being a scarce resource in this area (and projected to be in future as climate change affects rainfall patterns) the proposed new agricultural practices will allow a sustainable agricultural unit.			
(f) Any other Plans (e.g. Guide Plan)	YES	NO	Please explain
Not applicable			

3. Was the land use (associated with the activity for which rectification is sought) considered within the timeframe intended by the existing approved Spatial Development Framework (SDF) agreed to by the relevant environmental authority (i.e. was the development in line with the projects and programmes identified as priorities within the relevant IDP)?	**YES X**	NO	Please explain
The Western Cape PSDF is a planning document that guides district and local spatial initiatives such as IDP's and SDF's. It aims to create a coherent framework for the province's urban and rural areas. The PSDF aims to guide the location and form of public investment in the Western Cape's urban and rural areas. Whilst it cannot influence private sector investment patterns, it has an important contribution in terms of reducing business risk by providing clarity and certainty on where public infrastructure investment will be targeted, thereby opening new economic opportunities in these areas. The current economic state with high levels of unemployment, especially amongst the youth, and recent job losses in agriculture all adds to the high levels of rural poverty and unemployment. The proposed project will create direct and indirect job opportunities during the construction phase, from which local and specialised labour will benefit. There is also a knock-on benefit to local trade and tourism sector with expected additional revenue and indirect job creation. The proposed project will create direct and indirect job opportunities during the construction phase, from which local and specialised labour will benefit. There is also a knock-on benefit to local trade and tourism sector with expected additional revenue and indirect job creation. The proposed project will continue to provide direct labour opportunities in the agricultural and tourism sector during the operational phase. It is expected that the proposal will create 20 permanent direct employment opportunities and 30 permanent indirect employment opportunities.			

4. Should development, or if applicable, expansion of the town/area concerned in terms of this land use (associated with the activity being applied for) have occurred here when activities commenced?	**YES X**	NO	Please explain
The clearance of the two dams, the access road to the dams and the firebreak road were motivated by agricultural practices on site. The new landowner needed to clean out the dams to restore their functionality and created the access road to enable access from the main road.			
The two cottages and utility/ parking building were built to provide accommodation to the new landowner and his son who work on the farm, and it will enable the new landowner to stay on site when at the farm. This will improve his ability to manage the land and create additional security.			
The firebreak road is based on a need to protect the farm from possible fire risk – there is evidence (supported by the Botanical study) that there has been fires through the property in recent years. The road also has a dual function to provide access to landowners on the river side of the farm.			
The lodge complements the existing agricultural activities on site enables economic growth on a local scale through the knock-on effect of employment, passing trade, increased trade at restaurants and shops in the area and increased awareness of the area within the tourism sector.			

5. Did the community/area need the activity and the associated land use concerned (was it a societal priority)? (This refers to the strategic as well as local level (e.g. development is a national priority, but within a specific local context it could be inappropriate.)	YES	**NO X**	Please explain
The activity was related to agricultural activities on site and to the ability to provide a clean drinking water source on site. The dams and spring up from it are the only source of drinking water on site. This water source must service both the residents on the farm and the animals. No historical irrigation was practiced – cultivation was dryland wheat.			
The new landowner aims to irrigate 5.5ha of lucerne as stock feed during drier times. This field was previously dryland wheat.			
The firebreak road will protect both the farm and adjacent land from possible future fires, so it serves the immediate community, and in addition it provides access to landowners on the river side of the farm. Previously access was across the farm.			
The two cottages and utility building, and the access road to the dams are unrelated to community needs but serve the landowner in terms of improved access and being able to reside on site.			
The lodge serves both the needs of the farm and the local community in relation to the income and job opportunities it will generate short and long term.			

6. Were the necessary services with adequate capacity available (at the time of commencement), or was additional capacity created to cater for the development? (Confirmation by the relevant Municipality in this regard must be attached to the Application Form / additional information as an **appendix**, where applicable.)	**YES X**	NO	Please explain

Water: The expansion of the two dams allows for the site to be self-sufficient in terms of water needs on site. The dams are filled via natural flow during the raining season and a spring. The lodge will be supplied with water from these dams.

Melkhoutrivier Water Balance

Water use	Volume estimation (m3/annum)	Volume calc
Lodge restaurant	949,0	40 seats. About 65 litres per seat per day (industry standard).
Lodge accommodation	1927,2	40 people @ 60% occupancy per annum (i.e. 219 days) @ 220l/person/day
Game in camps	146,0	40 animals @ 10l/head/day; the rest of the game drink direct from dams
5 cottages (landowner and workers)	1606,0	220 l/person/day - 4 people occupation 100% of year
Irrigation	37400,0	5.5ha @ 6800m3/ha/annum
Total	42028,2	115,15
Application volume	40422,2	110,75

NOTE: cottages considered Schedule 1 use so no need to include in application volume for WULA, but will show on meter

Estimated volume from spring	18m3/day	547m3/month
Estimated recharge to dams during rainfall	between 497.2m3 and 76.7m3	120 000m3/annum
Total estimated available volume (runoff and spring)	126 564m3/annum	
Volume (ecological reserve) to be released downstream	25%	31 641m3/annum
Volume available for WULA	94 923m3/annum	
WULA volume application % of total volume available	44%	

Water will be treated to SANS drinking water standards. A filtration system will be installed to treat the water.

The WULA is for the abstraction of water from Dam 1 for irrigation of 5.5ha of lucerne, watering of animals (game) and tourism use within the proposed new lodge. The 5.5ha lucerne is on previously cultivated dryland wheat fields and will serve as feed for the animals on site during drier periods. The lodge is designed to sleep 20 people and can seat 40 within its restaurant. The total proposed abstraction volume is 39 500m^3/annum, which is about 42% of the available flow within the watercourse, after 25% has been released downstream as ecological reserve. 1 606m^3 /annum will also be abstracted from Dam 1 for Schedule 1 use within the residents' cottages on site and does not form part of the WULA. The WULA is also for the (c) and (i) water use activities within the watercourse related to the illegal cleaning out and enlargement of Dam 1 and Dam 2, and the storage of additional water within Dam 1 and Dam 2.

The Existing Lawful Water Uses have been confirmed as part of the WULA process (refer Appendix M1 for WARMS). The ELU includes the storage of water and use of water from 6 dams of the following size:

Dam number	Volume (m^3)	Historical Use
Dam 1	5 235	Watering of animals and potable source
Dam 2	2 512	Watering of animals
Dam 3	954	Watering of animals
Dam 4	656	Watering of animals and potable source
Dam 5*	315	Watering of animals and potable source
Dam 6*	1 800	Watering of animals and potable source

NOTE: Dam 5 and Dam 6 on the table above are Dam 2 and Dam 1 in the S24G application process, and the only dams on the section of farm the Applicant is buying over from the Landowner.

Electricity: The houses / cottages on site are currently on ESKOM power supply, with the aim to be placed on solar supply. The pv panels will be placed on the roof of each cottage.

The water from the dams is distributed via solar pump. This pump measures less than 100m² and is located adjacent to the dam.

The intention is to supply the proposed lodge with solar energy and thus will be off the national grid sine the current ESKOM supply won't be able to supply the Lodge, and the costs to develop the ESKOM supply to the site is not considered economically viable. The solar panels will be placed on the roof of the proposed lodge. The lodge will also be fitted with gas geysers and gas stoves to reduce reliance on solar power.

Sewage disposal: The cottages each have a septic tank with a soak away. A conservancy tank will be installed to handle the sewage generated by the proposed lodge. See diagram below. Regular servicing of the conservancy tank must be undertaken. This will be the responsibility of the owner of the lodge/applicant.

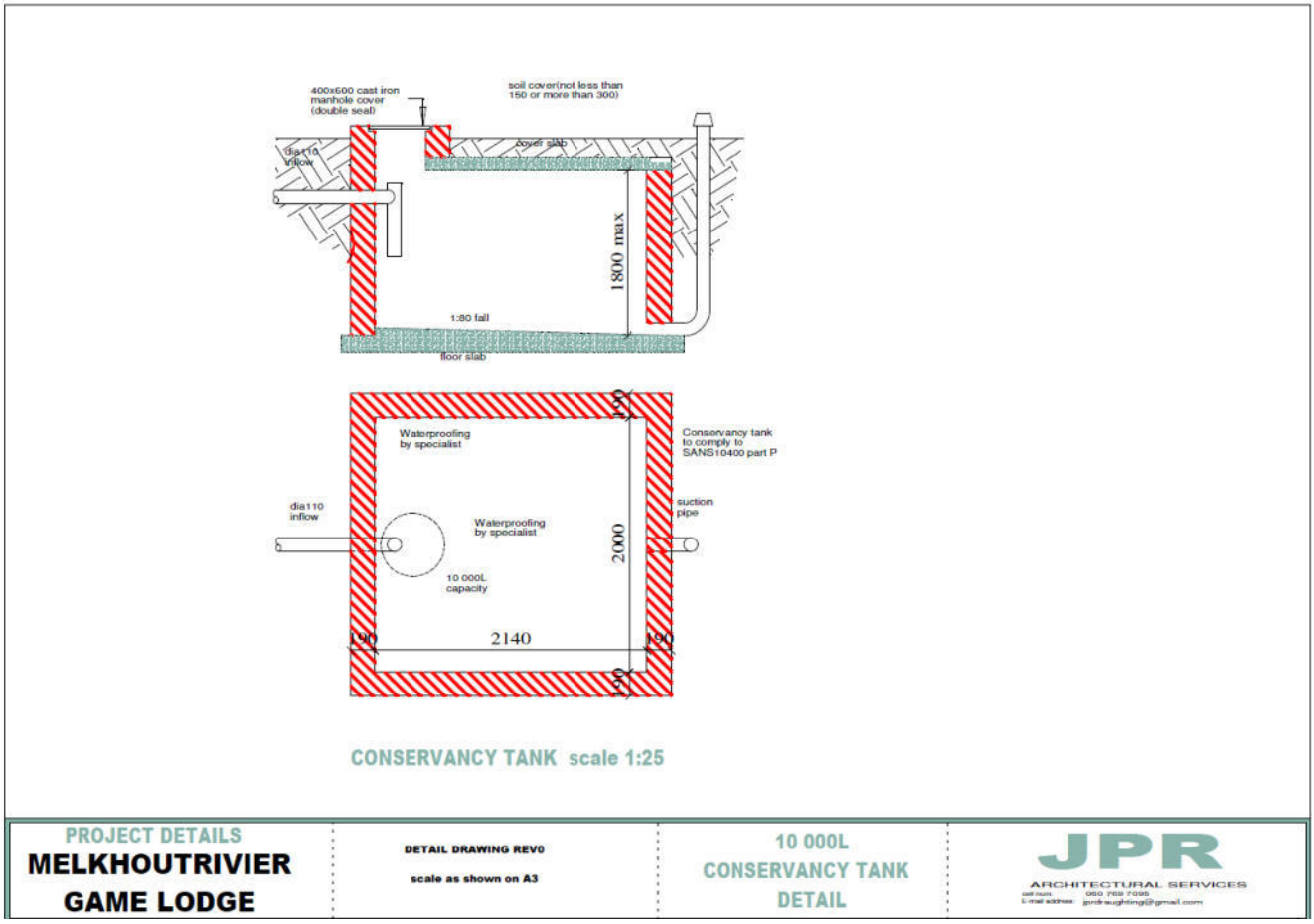


Figure 9: Illustration of proposed conservancy tank

Waste: The general waste will be sorted into recyclables and non-recyclables and removed by the Applicant to the Municipal dump site near Diepkloof. The Municipality will remove the waste from the dump site to a registered landfill site. The estimated domestic waste produced by the proposed lodge will be minimal.

7. Is/was this development provided for in the infrastructure planning of the municipality, and if not what was/will the implication be on the infrastructure planning of the municipality (priority and placement of services and opportunity costs)? (Comment by the relevant Municipality in this regard must be attached to the Application Form / additional information as an **appendix**, where applicable.)	YES	**NO X**	Please explain
This development does not form part of the infrastructure planning of the municipality due to its rural nature. Agriculture and tourism are some of the largest economic activities in the municipal area and the Swellendam SDF and IDP encourages further job creation within these sectors.			

8. Was this project part of a national programme to address an issue of national concern or importance?	YES	**NO X**	Please explain
The project is well placed for local job creation but does not form part of a national programme to address issues of national concern or importance.			

9. Did location factors favour this land use (associated with the activity applied for) at this place? (This relates to the contextualisation of the land use on this site within its broader context.)	**YES X**	NO	Please explain
The site is already an existing farm with existing agricultural activities. The access roads, expansion and cleaning of the dams and clearance of vegetation around the dams were all activities aimed at furtherance of agriculture on site.			
The old quarry was found to be a suitable location for the proposed lodge. The area is already mostly devoid of vegetation and cannot be used for agricultural activities, and the lodge is materially linked to the existing agricultural activities on site. According to the Botanist, most of the vegetation that has returned could in fact be rooikrans (*Acacia cyclops*), a highly invasive woody species very common in the area. Indigenous plant species diversity is likely to be low, given the previous soil disturbance, and no plant SoCC are likely. The botanical sensitivity of the proposed footprint area is Low.			
The owner's cottages and parking/utility building site is on a north facing slope about 25m North of the edge of old cultivated lands. This area was not specifically looked at whilst on site, but judging by satellite imagery time series the site appears to have been natural vegetation until July 2020, and some sort of building footprint is evident there from March 2021, but it was then only about 300m^2 in extent. In 2023 two new houses and as shed/utility building were built here, and the total disturbance footprint enlarged to 2700m^2 (Cape Farm Mapper). The botanical diversity in most of this 0.27ha area was probably fairly high, there may have been one or two SoCC present, and the botanical sensitivity was likely to have been Medium to High.			
The firebreak road was already in place and the extension of it allowed the registration of a servitude road to allow access to landowners on the river side of the farm.			

10. How did/does the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas (built and rural/natural environment)?	**YES X**	NO	Please explain
The response received from HWC on the NID submitted saw no possible impact on heritage resources or sensitive cultural areas from the proposed project. Refer Appendix M3.			
The actual dam footprints are likely to have been of **Moderate** botanical sensitivity prior to clearing, and the adjacent cleared terrestrial areas are still of **moderate to high botanical** sensitivity, as is most of the area through which the new access track is routed. The botanical sensitivity of the eastern firebreak area is likely to be **High**, whereas in the proposed lodge it is likely to be **Low.** The botanical sensitivity for the cottages area was likely to have been **Medium** to **High**. No significant faunal impacts are likely to have arisen as a result of the vegetation clearing next to the dams or in the road footprints, largely because the noise associated with such would have caused most of the fauna to vacate the area and move to suitable nearby habitat, which is still available. The clearing out of the dams would have temporarily disturbed the fauna in these areas, but appears to have recovered fully and quickly, as would be expected. No faunal SoCC are likely to be permanently present with the proposed footprints for the lodge nor for the owner's cottage, but some may occasionally be present in the eastern firebreak area but would not have been negatively impacted in the long term by the clearing of the firebreak. The dams have not resulted in any significant impact on the flow in the associated watercourse. The dams need not be removed but should be mitigated by implementing aquatic ecosystem-related mitigation and rehabilitation measures such as clearing invasive alien plants from the riparian zones and revegetating where necessary with suitable indigenous vegetation.			

11. How did/does the development impact on people's health and wellbeing (e.g. in terms of noise, odours, visual character and sense of place, etc.)?	YES	**NO X**	Please explain
The site is within a rural setting and located some distance from the village of Malgas. There are scattered residences on the river side of the farm, but they are suitably far away so that noise, dust or other nuisance factors will not affect them.			
The proposed activities (dam cleaning, expansion and vegetation clearance) have minimal impact on people's health and wellbeing due to the distance from the nearest residential dwellings.			

The two cottages and utility / parking building, and the lodge are in relatively isolated spots, and the site is an existing farm with existing agricultural activities.
The visual impact already largely exists as this is an existing farm, while landscaping screening and using natural colours for the outside of the lodge will reduce visual impacts from it.
The Heritage NID and Screener found no change in the character of the site is anticipated – refer Appendix M3.

12. Did/does the proposed activity or the land use associated with the activity applied for, result in unacceptable opportunity costs?	YES	**NO X**	Please explain
The site is an existing farm with existing agricultural activities.			
The road building, expansion and cleaning of the dams and clearance of vegetation around the dams were all activities aimed at furtherance of agriculture on site.			
The proposed lodge site is on an already impacted and cleared quarry site with a low botanical significance.			

13. What were the cumulative impacts (positive and negative) of the land use associated with the activity applied for?	**YES X**	NO	Please explain
Positive: 1) Direct and indirect, temporary and permanent job creation 2) Training and skills transfer to new employees 3) Stimulation of local supply market during construction (accommodation, construction) and operation (tourism) 4) Alien vegetation removal in dams and along drainage lines and terrestrial areas to improve the ecological integrity of the river over the long term and the terrestrial areas. 5) The firebreak road will protect both the farm and adjacent land from possible future fires, so it serves the immediate community, and in addition it provides access to landowners on the river side of the farm. Previously access was across the farm.			
Negative: 1) Loss of indigenous vegetation 2) Resource usage (water) for tourism and irrigation 3) Potential water quality degradation from upstream disturbance 4) Potential water quality and hydraulics impacts			
The cumulative botanical impacts are understood to be equivalent to the regional botanical and faunal impacts, in that the vegetation type and fauna impacted by the proposed development has been, and will continue to be, impacted by numerous developments (mainly agricultural) and other factors (the cumulative impacts) within the region. However, in this case the botanical and faunal impacts are mostly not of a permanent nature (except perhaps in the case of the access road), and thus arguably the cumulative negative ecological impacts are relatively low. If large quantities of water are to be abstracted for irrigation this could have notable negative cumulative impacts on the groundwater dependant ecosystems in the nearby areas, such as the seeps.			

14. Is/was the development the best practicable environmental option for this land/site?	**YES X**	NO	Please explain
The site is an existing agricultural area with existing impacts associated with the agricultural activities.			
The access road follows the shortest route (as allowed by the terrain) with less indigenous vegetation removal than any other route.			
Clearance around dams was to repair and enlarge the dam walls to provide access to clean water at a steady supply for domestic, agricultural and tourism purposes on site.			
The proposed lodge was placed on an existing derelict quarry that required minimal vegetation removal or loss of agricultural land. Vegetation that has regrown in this disturbed area seems to be mainly aliens.			
The two cottages and utility/ parking building were constructed to provide accommodation to the new landowner and his son for the time periods when they are on the farm. No alternative accommodation for them exist.			

15. What are/were the benefits to society in general and to the local communities?	Please explain
1) Direct and indirect, temporary and permanent job creation through construction and operational phases (agriculture and tourism) 2) Stimulation of local market during construction (accommodation, construction) and operation (tourism knock-on effect on other hospitality institutions such as local restaurants, tours and wine farms). 3) Training and skills transfer to new employees needed for the agricultural activities and the lodge. 4) Upliftment through employment and training in the local community where job creation is mostly seasonal and ad hoc. 5) Increased awareness of the area as a preferred tourism spot. 6) The firebreak road will protect both the farm and adjacent land from possible future fires, so it serves the immediate community, and in addition it provides access to landowners on the river side of the farm. Previously access was across the farm.	

16. Any other need and desirability considerations related to the activity?	Please explain
Minimisation of vegetation removal – the shortest route for the access road was chosen. The clearance around the dams was done to obtain material for dam wall repairs.	
No new dams were constructed- cleaned and expanded on existing dam infrastructure to make more efficient and return functionality.	

17. Please describe how the general objectives of Integrated Environmental Management as set out in section 23 of NEMA were taken into account:
The S24G report investigates, assesses and communicates all potential impacts of the proposed project. Specialist studies (Botany and Faunal, Freshwater Ecology, Heritage and Hydrological) were conducted where knowledge gaps existed or as identified by the DEFF Screening Tool. All potential impacts are identified and rated, and any suitable alternatives to mitigate, manage or eliminate these impacts were explored. Impacts to the environment and socio-economic are assessed for the alternative options.
The only infrastructure still to be completed is the lodge, but its location is dictated by the presence and size of the old quarry, which is an area largely devoid of vegetation and agricultural potential.

18. Please describe how the **principles of environmental management** as set out in section 2 of NEMA were taken into account:
The aim of these principles is to guide stakeholders to ensure a holistic evaluation, with the precautionary principle used as a focus in order to encourage development which is sustainable, and which retains the sense of place as far as possible whilst exploring feasible and reasonable alternatives to achieve such objectives. It is anticipated that no cultural / heritage aspects will be disturbed because of the proposed project or by the commencement of illegal activities on site. Furthermore, a cautious approach will be used during all stages of the development with the best possible environmental option being explored. The Environmental Management Plan (EMPr) for Construction and Operation will guide an eco-oriented approach. The existing farming activities have existing impacts. The potential impacts from the proposed project and the illegal commencement of activities were considered and mitigation measures were proposed. The MMP (if adopted) will allow the continuation of certain listed activities, within pre-approved methods based on assessed impacts, during the lifecycle of the project.

SECTION E: ALTERNATIVES

Please Note: Before completing this section, first consult this Department's *Guideline on Alternatives* (March 2013) available on the Department's website (**http://www.capegateway.gov.za/eadp**).

"Alternatives", in relation to an activity, means different means of meeting the general purposes and requirements of the activity, which may include alternatives to –

(a) the property on which, or location where, it is to undertake the activity/the activity was undertaken;
(b) the type of activity to be undertaken;
(c) the design or layout of the activity;
(d) the technology to be used in the activity;
(e) the operational aspects of the activity; and
(f) the option of not implementing the activity.

The NEMA prescribes that the procedures for the investigation, assessment and communication of the (potential) consequences or impacts of activities on the environment must, *inter alia*, with respect to every application for environmental authorisation –

- ensure that the general objectives of integrated environmental management laid down in NEMA and the National Environmental Management Principles set out in NEMA are taken into account; and (where applicable)
- include an investigation of the potential consequences or impacts of the alternatives to the activity on the environment and assessment of the significance of those potential consequences or impacts, including the option of not implementing the activity.

The general objective of integrated environmental management is, *inter alia*, to "*identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage, the risks and consequences and alternatives and options for mitigation of activities, with a view to minimising negative impacts, maximising benefits, and promoting compliance with the principles of environmental management*" set out in NEMA.

1. In the sections below, please provide a description of any considered alternatives and alternatives that were found to be feasible and reasonable.

Please note:

- Detailed written proof of the investigation of alternatives must be provided. If no reasonable or feasible alternative exists, a motivation must be provided.
- Alternatives considered for a Section 24G application are used to determine if the development was the best practicable alternative (environmentally, socially and economically) for the site or property.
- In respect of a section 24 application, the option of not implementing the activity ("no-go"), includes the option of ceasing the activity, not implementing continuation of the activity, refusal of the commenced activity and complete rehabilitation of the affected site.

(a) Property and location/site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

There are no site alternatives for the **two dams**. They were existing and in place at this site and the cleaning of and expansion of the two dams were motivated by the need for a clean and secure drinking water source on site.
The **firebreak road** location was determined by the boundary fence and no site alternative exists for it. The firebreak road was constructed with a dual function – to provide protection against veldfires and to allow alternative access for residents along the river front so they would not have to use the old road adjacent to the proposed lodge site. The road is being registered as a servitude road for access to these landowners. Previously they used access across the farm, but this will be a security concern and a disturbance to animals on the farm within the new development.
The **access road** was constructed for the shortest route (as allowed by the rocky terrain) from the main road to the two dams so no site alternative exists for it. The **single-track farm road** to the dams and over the dam wall was constructed to provide access to the dams and to the farm roads to the west of the dams, therefor its location was determined by the location of the dams and no site alternative exists for it.
The **lodge location** was chosen on the existing quarry site, as there is no/minimal vegetation removal, and no loss of agricultural land associated with the site location. The future new landowner has changed the farming activities on site over the last few years, from dryland wheat to game farming and proposes to use the lodge as a hunting lodge (during certain parts of the year) and general tourism lodge for the remainder of the year.
The **two new cottages and the parking/utility building** have been constructed, and no site alternative exists.

(b) Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

There are no activity alternatives. The site is an existing farm with existing agricultural activities. The proposed lodge is materially linked to the agricultural activities on site. Refer page 18 this document for further explanation. The dams were cleared and enlarged to provide water to planned activities on site. This includes providing water to game on site, irrigating previous dryland wheat area (crop change to lucerne) and providing drinking water to the farm manager, workers, homeowner and lodge residents. There is no other source of water on the site.

(c) Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

The **access roads** were constructed with the shortest route in mind (as allowed by the topography) and minimises vegetation removal. Small sections of the access road (along the old fields) appear to have been present as far back as 2012, and the road skirts a quartzite outcrop, which also dictated part of the route, therefore there is no design/ layout alternative for the access road.
The **firebreak road** location was determined by the boundary fence and no design/ layout alternative exists for it. The firebreak road was constructed with a dual function – to provide protection against veldfires and to allow alternative access for residents along the river front so they would not have to use the old road adjacent to the proposed lodge site. The road is being registered as a servitude road for access to these landowners. Previously they used access across the farm, but this will be a security concern and a disturbance to animals on the farm within the new development.
The **two cottages and utility/parking building** are built, and no design/ layout alternative exists for them. Their size was kept to the minimum to minimise their footprint.
The **lodge site** was chosen to lie within an old quarry with mostly barren areas, allowing minimal vegetation removal and disturbance to animals on site from activities at the lodge, and no loss of agricultural areas. No layout alternatives are proposed. The boardwalk linking the units to the lodge allow for minimal vegetation disturbance and avoids further clearance.

(d) Technology alternatives (e.g. to reduce resource demand and resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts or detailed motivation if no reasonable or feasible alternatives exist:

There are no technology alternatives as the proposed project is for construction of two cottages and a parking/utility building, two roads, expansion of two existing dams and construction of a lodge.

(e) Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

There are no operational alternatives as the proposed project is for construction of two cottages and a parking/utility building, access roads, expansion of two existing dams and the proposed construction of a lodge with associated modes of operation. .
The EMPr contains measures to manage and mitigate operational aspects of the project post completion and is attached in Appendix I1.

(f) The option of ceasing the activity (the refusal of the activity(ies) and/or rehabilitation of the site):

The dams were existing and in use prior to the work being completed on them and provide the only freshwater to the people and animals at the site. Therefor the option of ceasing the activity and rehabilitation will not be favourable.
The access roads allow direct access from the main road to the dams. The farm is extensive, and this road allows a direct link onto the dam site and to the landowner's cottages. Part of the road follows the outer edge of cultivated lands, and the layout of the road is determined by the rocky terrain. If the roads were to be rehabilitated it would have to be replaced by another access road, which makes this option not favourable.
The two cottages provide lodging to the new owner and his son as they work on the site on a regular basis and need housing. If the two cottages were to be removed there would still be a need for the new landowner and his son to build accommodation for them for the periods they are on the farm. The parking/ utility building provides under roof parking for the cottages.
The lodge site has not been constructed yet so will be assessed in terms of NO-GO option. If the lodge was not to be built there would be a potential loss in temporary and permanent employment, knock on income from tourism activities linked to the lodge and the economic benefits to the local community in terms of trade.
The fire break road is already in place, has become a servitude road and provides access to landowners on the river side of the property. Rehabilitation of the road is not favourable and would still require a firebreak and additional access/servitude road constructed to allow those properties access across the farm.

(g) Any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

None identified at this time.

(h) Please provide a summary of the alternatives investigated and the outcomes of such investigation:

Please note: If no feasible and reasonable alternatives exist, the description and proof of the investigation of alternatives, together with motivation of why no feasible or reasonable alternatives exist, must be provided.

The access roads, firebreak road, two cottages and expansion of dams has been completed so alternatives in terms of location, activity, design/layout and technology for these are not feasible.
The option of ceasing the activity (the refusal of the activity(ies) and/or rehabilitation of the site is not feasible for any of the completed construction on site.
There are no activity, technology and location alternatives for the lodge as they are associated activities for a tourism facility. The site is disturbed with alien vegetation returning in places and no agricultural potential.
NO-GO ALTERNATIVE The No Go Alternative is usually considered to mean a continuation of the status quo. Here it could imply further random loss of habitat to unauthorised development, largely unmanaged alien plant invasion, and possible unpredictable future impacts (such as excavation of trenches, or inappropriate fire regimes). Confidence in the likelihood of impacts is thus only moderate, but the No Go alternative would in this case probably not be the environmentally preferred alternative, as it may have a Medium negative impact over time, driven mainly by the negative ecological impacts of ongoing, unmanaged alien plant invasion (habitat loss and degradation, species loss, degradation of wetlands). If the lodge was not to be built there would be a potential loss in temporary and permanent employment, no knock-on income from tourism activities linked to the lodge and no economic benefits to the local community in terms of trade. The income from the lodge is also required to part fund the agricultural activities on site, so this loss of additional income will have a detrimental effect on the proposed farm operations in future.

SECTION F: IMPACT ASSESSMENT, MANAGEMENT, MITIGATION AND MONITORING MEASURES

Please note, the impacts identified below refer to general impacts commonly associated with development activities. The list below is not exhaustive and may need to be supplemented. Where required, please append the information on any additional impacts to this application.

Please note: The information in this section must be duplicated for all the feasible and reasonable alternatives (where relevant).

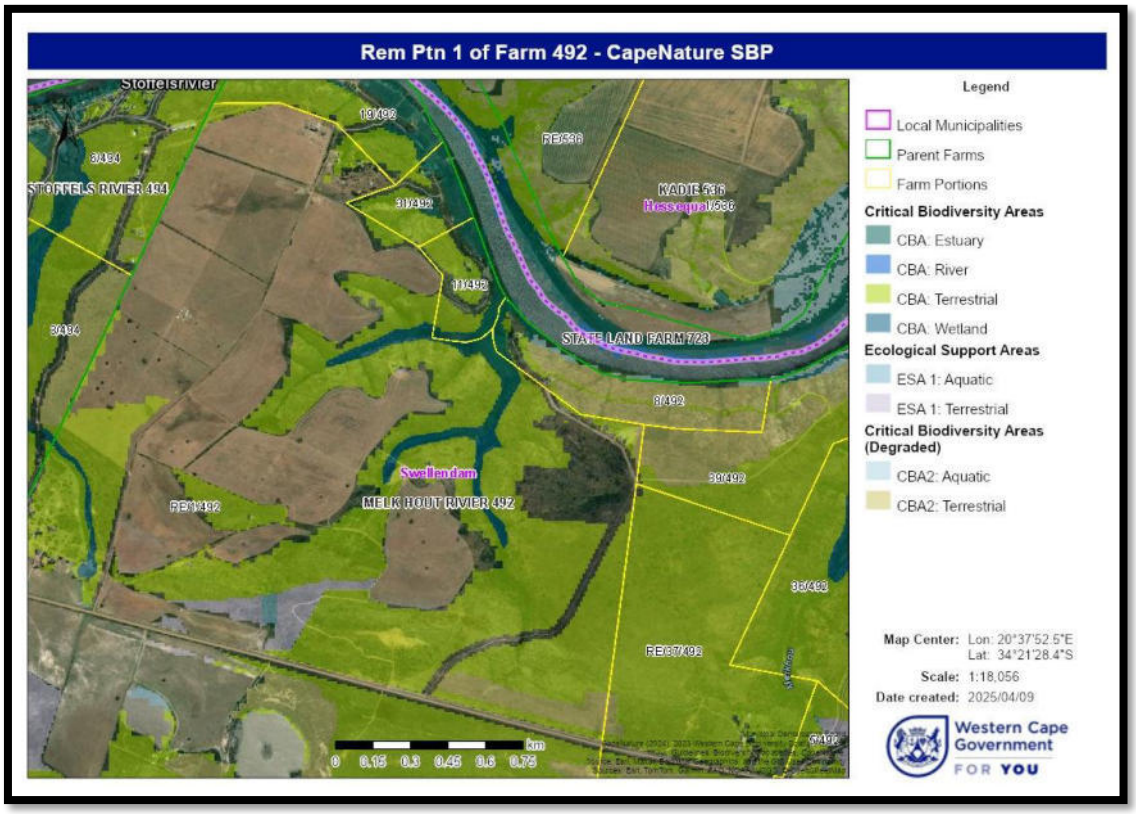
1. PLEASE DESCRIBE THE MANNER IN WHICH THE DEVELOPMENT HAS IMPACTED ON THE FOLLOWING ASPECTS:

(a) Geographical and physical aspects:

Dam 1 and Dam 2 have been expanded.
Roads (new access road, single track farm road and firebreak road) have been established through previously vegetated areas.
Transformation of land through building of two new cottages, the parking/utility building and the proposed lodge.

(b) Biological aspects:

Has the development impacted on critical biodiversity areas (CBAs) or ecological support areas (ESAs)?	**YES X**	NO
If yes, please describe:		
According to the Botanical Impact Assessment Report the cleared areas around the dams are mapped as CBA1 (terrestrial). The access road passes through unmapped habitat, Ecological Support Area (ESA1), and CBA1. The firebreak road and extension fall within CBA 1 and CBA 2. The owner's cottages and the parking/utility building are in an area mapped as CBA1 (terrestrial), the lodge in an unmapped area. Refer to Figures 5a and b and 6.		



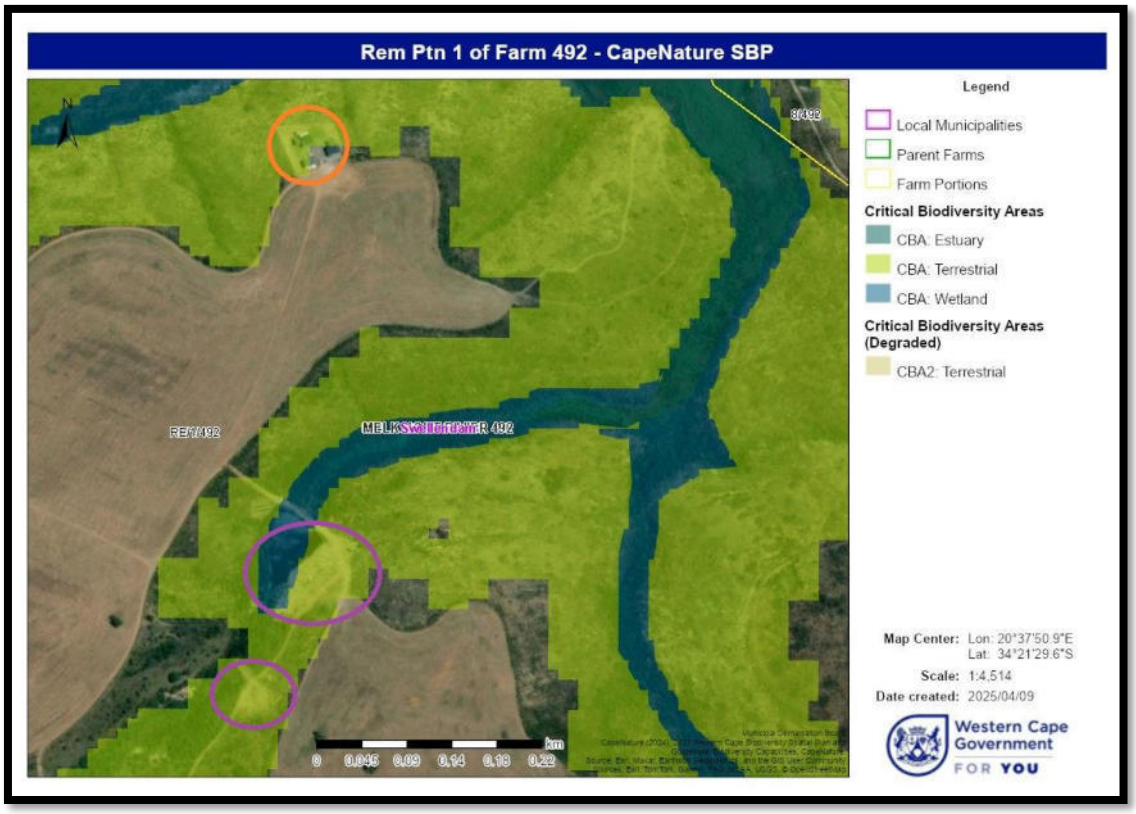


Figure 5a and b: CapeNature Spatial Biodiversity Plan extract (Helme, September 2025)

According to the Freshwater Specialist, the property lies north of the De Hoop Nature Reserve, a Protected Area. The lower river system within the site is mapped primarily as an aquatic CBA, where there is a valley bottom wetland associated with the river. Aquatic ESAs are also mapped along the larger river system and its tributaries, as the watercourses provide important ecological services as aquatic corridors within an increasingly transformed landscape. See Figure 6.

Figure 6: Western Cape Biodiversity Spatial Plan in the vicinity of the site (Belcher, July 2023)

The study area is within a FEPA River Sub-catchment associated with the lower Breede River. See Figure 7.

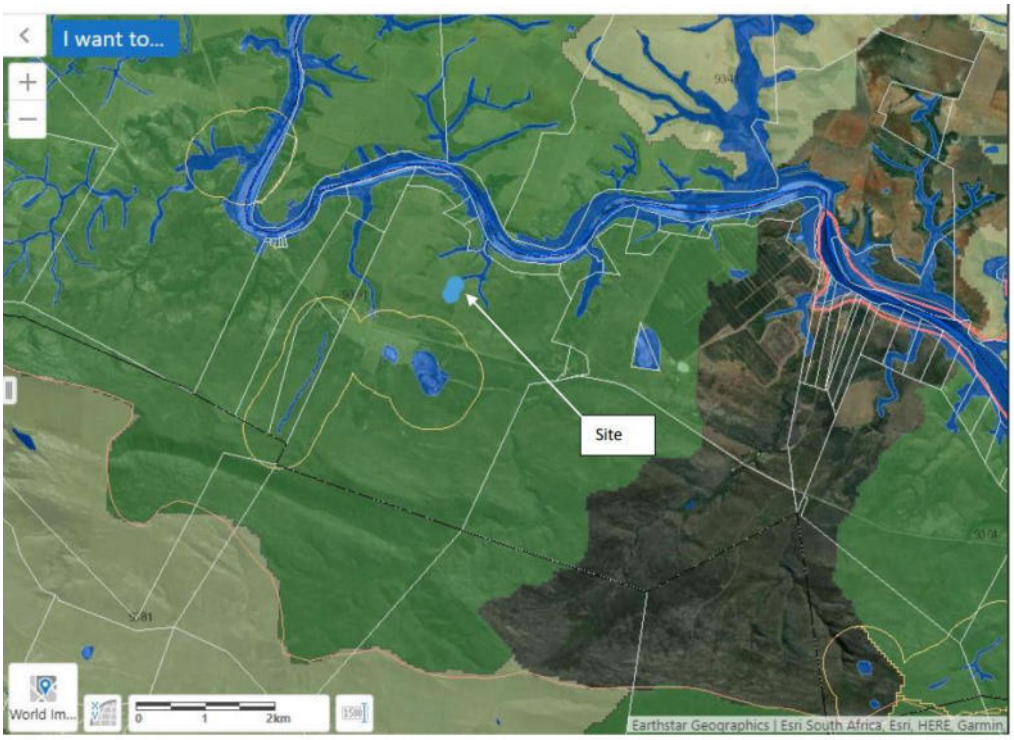


Figure 7: SANBI mapping showing National Freshwater Ecosystem Priority Areas for the dam sites (blue dots) and surrounding area site (Belcher, July 2023)

The valley bottom wetlands as well as the large depression wetlands (Soutpan and Varsvlei) that are upslope of the gravel road and the site are mapped as natural FEPA Wetlands and a Wetland Cluster in the case of the depression. These wetlands are also mapped within the National Wetland Map version 5 – see Figure 8.

Figure 8: CFM FEPA Wetlands and National Wetland Map for the Farm (Belcher, July 2023)

Has the development impacted on terrestrial vegetation, or aquatic ecosystems (wetlands, estuaries or the coastline)?	**YES X**	NO
If yes, please describe:		

According to the Botanical/Biodiversity Report:

IMPACTS ON VEGETATION

Botanical impacts associated with the development of an area may be both direct and indirect, with the former occurring mostly at the construction stage and the latter mostly at the operational stage. Direct impacts may be both permanent and long term. All impacts in this case are negative, although proposed/required mitigation would have notable positive impacts.

Construction Phase Impacts (Direct Impacts)

In this instance the primary direct impacts have already occurred, being the temporary degradation and/or clearing of about 0.6ha of previously largely natural Eastern Ruens Shale Renosterveld (although officially mapped as Potberg Ferricrete Fynbos) adjacent to dams 1 and 2, permanent loss of about 0.35ha of vegetation in the access road area (see Appendix B for site plans), and long term to permanent loss of about 0.1ha of Eastern Ruens Shale Renosterveld (although officially mapped as Potberg Ferricrete Fynbos) in the northeastern firebreak area (see photo 8 in Photoreport by PHS – Appendix C). As of August 2025, two new cottages and a utility/ parking building have also been built in the "owners cottage proposed footprint" (0.27ha).

Additional impacts here assessed include damage to vegetation within the enlarged dam footprints. The status of the vegetation in the impacted areas is complicated by the fact that most of it is formally mapped as Potberg Ferricrete Fynbos but is in fact arguably better classified as eastern Ruens Shale Renosterveld. The former is gazetted as Critically Endangered, whilst the latter is now gazetted as Endangered.

Essentially most (>80%) of the vegetation clearing activity was undertaken in areas mapped as CBA1.

Only 3 plant Species of Conservation Concern were recorded in (or next to) the access road area and in (or next to) the areas cleared around the dams, and a further 1 or 2 may have occurred in the area cleared for the firebreak and in the cottages footprint area. The impact on plant SCC of all the elements assessed is deemed to be Low, and in fact 2 of the 3 SSC have already re-established in the cleared areas around the dams, and their populations are likely to increase in this area.

The removal of natural vegetation in the areas next to the dams generally did not significantly disturb the upper soil layer, except in occasional areas (maybe <10% of total cleared area). This means that the clearing effectively removed all the vegetation above ground, but in most cases did not significantly disturb the seed bank, roots or underground storage organs of the indigenous species. In many respects it was thus akin to very close brushcutting of the vegetation, even though a brushcutter was not used. Natural rehabilitation is thus predicted to be good (Helme & Rebelo 2016), and there is already plenty of evidence of this on site, some 2 to 2.5 years after clearing.

The clearing of the vegetation in the road and firebreak areas appears to have been more comprehensive, especially in the former (not surprisingly). There is thus negligible natural rehabilitation (current and expected) in the road area, and only minor rehabilitation in the firebreak area, although the latter is expected to largely recover over a period of 7-10yrs, if not further disturbed.

The magnitude of the impacts ranges from Medium (ecological functioning previously present in the cleared areas will be partly disturbed) to High (no functioning), duration will be short to permanent (3-10yrs to natural recovery, but>10yrs for road), and extent will be site specific (local). No permanent loss of species or SCC is likely, provided that the cleared areas are allowed to rehabilitate naturally (excluding the access road, where it is not known if any SCC were present prior to clearing, but it seems unlikely that they were).

In the case of the cottages area the construction phase botanical and faunal impacts are likely to have been Low to Medium negative, given that the site was largely natural vegetation prior to 2021, and most of it was a mapped CBA1 with natural vegetation.

The overall construction phase impacts would be Low to Medium negative, before and after mitigation. Adequate and appropriate mitigation is only likely to be viable at the operational phase, primarily in the form of natural rehabilitation of disturbed areas and extensive alien vegetation removal on the site.

Operational Phase Impacts

The primary operational phase botanical impacts (post clearing) are habitat fragmentation, and further invasion of alien species, which is facilitated by the partial soil disturbance caused by the mechanical clearing, especially when combined with no stump poisoning of large Port Jackson and black wattle trees (which will thus resprout). The former cannot be mitigated (natural rehabilitation will mitigate this naturally over time), but the latter can be successfully mitigated by proper alien invasive plant management of the remaining natural areas (see Martins et al 2021 for required methodology). Expected significance of these impacts is **Low - Medium negative** before mitigation, and **Low positive** after mitigation.

In the case of built infrastructure (proposed lodge and owners cottages) this is likely to result in fire suppression around these areas, which if it goes on for too long (>15-20yrs) will have negative ecological impacts, as these are fire adapted ecosystems which require regular fire for optimal ecological functioning (Helme & Rebelo 2016). This is likely to have a local **Low - Medium negative** botanical impact, and is unlikely to be actively mitigated (in the form of controlled burns), as landowners are typically reluctant to undertake such due to legal liability concerns.

The operational phase impacts of the firebreak clearing along the eastern fence should be **negligible** if it doesn't happen again but could be **Low - Medium negative** if it is repeated (no certainty on which way it is likely to go). Any future clearing of firebreaks on the property must be done by brushcutting, to a height of no lower than 10cm. No soil disturbance should be allowed (hence no scraping by machinery), as this encourages alien plant invasion.

The proposed irrigation of currently fallow or cultivated land on the property was mentioned as a possible impact to be assessed. However, without any details on the total proposed areas this cannot be assessed in any detail, except to say that it is unlikely to have any direct negative faunal or botanical impacts. However, if large quantities of water are to be abstracted from the catchment then this is a potential indirect negative ecological impact, and should be investigated at a catchment level, by a competent geohydrologist, as there are already clear drying impacts evident in the seeps and wetlands in the area. Ideally river water would be used for any required irrigation, and not abstracted groundwater, as this is the only way to ensure no impact on the seepage areas nearby.

According to the Freshwater Ecological report:

IMPACTS ON AQUATIC FEATURES

The aquatic ecosystem assessment determined the river to be moderately modified and of moderate ecological importance and sensitivity with a target ecological condition of largely natural to moderately modified. This is largely due to the disturbance and loss of riparian vegetation along the watercourse and its replacement with alien vegetation. Removal of alien vegetation removal along the riverbanks is being undertaken and can be expected to improve the ecological integrity of the river over the long term.

Past imagery for the farm indicates that the tributary at the dam sites has long been disturbed. The recent works have taken place within these already disturbed areas and thus have not resulted in any further degradation of the river system.

The dams appear to have been constructed within the watercourse prior to 1940 but were not maintained for a long period until 2019/2020.

The dams have also not resulted in any significant impact on the flow in the associated watercourse. The catchment of the dam is less than 0.95 km^2 and generates a runoff of approximately 120 000 m^3. The dams have a combined storage of less than 10 000m^3 and thus do not impact significantly on the medium to high flows. (The actual calculated capacity is at 4130m^3, and is the volumes being applied for in the WULA.) There is also an approx. 300 – 400 mm outlet pipe in the dam wall that allows a constant release into the downstream watercourse during low flow conditions, with a second one at a slightly higher level that allows for further downstream flow releases in higher flow conditions.

It is preferred that water be obtained from the surface water and out of the dams than drawing down the groundwater table through the abstraction of a borehole in the area. The contact springs on the property and surrounding areas are essential in supporting many groundwater-dependent ecosystems.

The initial Freshwater Assessment found that the new cottages and the parking/utility building lie on the hill tops and more than 80m from the watercourses and are thus deemed to have had no impact on the aquatic features. A recent site visit by the EAP has confirmed that the most easterly cottage is within 32m of a drainage line. This was communicated to the specialist who then confirmed the 20m vegetation buffer is sufficient and the assessment would not change (refer Appendix H1).

Has the development impacted on any populations of threatened plant or animal species, and/or on any habitat that may contain a unique signature of plant or animal species?	**YES X**	NO
If yes, please describe:		

Three plant Species of Conservation Concern (SCC) were recorded from the surveyed study area footprints and immediately adjacent areas. This is a relatively low number of SCC, and is indicative of the partly disturbed and alien invaded nature of much of the surveyed area. Many more SCC are likely to be present elsewhere on the greater property, including within some of the unsurveyed footprints (i.e. new houses and eastern boundary fence) but not within the actually surveyed study areas.

Two of the three SCC (the *Aspalathus* and *Hermannia*) were commonly recorded in the recently cleared areas near the dams, with no SCC recorded exclusively in the cleared areas, indicating 1) that the disturbance caused by the clearing around the dams has not been significantly deleterious to most species and 2) that the cleared areas still have significant botanical value.

Aspalathus steudelina has an EOO of 12 000km^2 and its population on site (12 plants within 30m of the dams) is not among the largest 10 aggregations known for the species. The population of this species in the study areas (the disturbed areas and immediate surrounds) is regionally of low significance.

Hermannia lavandulifolia has an EOO of 12 000km^2 and its population on site (15 plants within 30m of the dams) is not among the largest 10 aggregations known for the species, which is still common in suitable habitat in much of the southern Cape. The population of this species in the study areas (the disturbed areas and immediate surrounds) is regionally of very low significance.

Lobostemon daltonii is a sandstone species and is locally quite common on sandstone outcrops and may not have lost any individuals to the new access road, although this is impossible to retrospectively confirm. Its total known range is small (EOO of <20km^2), but its population on site (5 plants within 30m of the road) is not among the largest 10 aggregations known for the species. The population of this species in the study areas (the disturbed areas and immediate surrounds) is regionally of low to moderate significance.

The likelihood of there being undetected Species of Conservation Concern in the surveyed study areas on the property is deemed to be Low, but is High in at least one of the unsurveyed study areas (the eastern firebreak), and Moderate for the house footprint area. Required buffer distances for the SoCC are not known, but as long as the ecosystem is still largely functional in the areas where these species occur (notably a natural fire regime with fire once every 10-15 years) no buffers should be required.

Table showing the plant Species of Conservation Concern that were recorded from the dam and roads study areas.

Species	**Redlist Status**	**Seen in recently cleared areas around dams and in track**	**Seen in undisturbed areas nearby**
Aspalathus steudeliana	Vulnerable	yes	yes
Hermannia lavandulifolia	Vulnerable	yes	yes
Lobostemon daltonii	Endangered	no	On sandstone outcrops next to access track

Please describe the manner in which any other biological aspects were impacted:

FAUNAL IMPACTS

No significant faunal impacts are likely to have arisen as a result of the vegetation clearing next to the dams or in the road footprints, largely because the noise associated with such would have caused most of the fauna to vacate the area and move to suitable nearby habitat, which is still available. The clearing out of the dams would have temporarily disturbed the fauna in these areas, but appears to have recovered fully and quickly, as would be expected.

The impact of the assessed activities on fauna would seem to be low, with a healthy population of 4 frog species currently in the dams, and all the expected waterbirds in and around the dams. No animals are likely to have been permanently and negatively impacted by any of the activities, although the road and firebreak construction may have caused some loss of less mobile taxa (eg. slow moving ants or beetles), and others would have moved away. No faunal SCC are likely to have been permanently impacted by the activities, although some may have been temporarily impacted to a low level. In general, the faunal impacts are likely to have been of Low to Medium negative significance, and Low negative after mitigation (operational phase alien clearing).

No faunal SoCC are likely to be permanently present with the proposed footprints for the lodge nor for the owner's cottages, but some may occasionally be present in the eastern firebreak area but would not have been negatively impacted in the long term by the clearing of the firebreak. None of the proposed or existing development footprints would need specific buffers in order to mitigate further likely negative impacts on any of the faunal SoCC, largely because all the SoCC are highly mobile and can, and essentially do self-buffer, by moving to the most suitable habitats.

According to the Hydrological Study:

POTENTIAL HYDROLOGICAL IMPACTS

Over exploitation of the resource by extracting more water than the base flow rate.

The discharge from rainfall in the catchment area and flow from the springs have a finite contribution in terms of discharge volume. Over exploitation may cause termination of flow in the valley below the dams.

Inflow of effluent and chemicals that have the potential to change the quality of the surface- and groundwater.

The Sandstone outcrop in the study area can create a potential impact where a preferential path can be created where the potential leachate from livestock and game manure as well as pollutants from vehicles can pollute the surface- and groundwater by changing the quality of the water.

(c) Socio-Economic aspects:

What was the capital value of the activity on completion?	Approximately R16M	
What is the (expected) yearly income or contribution to the economy that is/will be generated by or as a result of the activity?	Approximately R24M	
Has/will the activity have contributed to service infrastructure?	YES	NO X
How many new employment opportunities were/will be created in the construction phase of the activity?	40 to 50	
What was the value of the employment opportunities during the construction phase?	Approximately R1.6M	
What percentage of this accrued to previously disadvantaged individuals?	95%	
How was this ensured and monitored (please explain):		
The workers were sourced from the local community and skilled labour from Somerset- West.		
This was monitored by the Applicant.		
How many permanent new employment opportunities were/will be created during the operational phase of the activity?	30 to 50	
What is the current/expected value of the employment opportunities during the first 10 years?	Approximately R3M	
What percentage of this accrued/will accrue to previously disadvantaged individuals?	95%	
How was/will this be ensured and monitored (please explain):		
The Applicant strives to employ workers within the previously disadvantaged sector and monitors the implementation of this on a personal basis.		
Any other information related to the manner in which the socio-economic aspects was/will be impacted:		

Impacts on socio-economic aspects:

➢ Potentially negative impacts

- Impact on traffic flows and road infrastructure
- Nuisance factors (noise, dust) during construction
- Infrastructure and resource requirements increased (sewage disposal, water usage)

➢ Potentially positive impacts

- Knock-on effect for trade and tourism market in local economy
- Direct and indirect employment opportunities (temporary and permanent) and skills transfer to new employees
- Attraction of more tourists to the area, especially during the slower winter months (hunting season) – this will be beneficial to the De Hoop Nature Reserve.
- Opportunity for environmental education information and information regarding the De Hoop Nature Reserve to be reach a wider audience.
- The firebreak road will protect both the farm and adjacent land from possible future fires, so it serves the immediate community, and in addition it provides access to landowners on the river side of the farm. Previously access was across the farm.

(d) Cultural and historic aspects:

A NID and screener was submitted to HWC for comment, and according to HWC there is no reason to believe that the S24G application will impact on heritage resources, and no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required (refer Appendix M3).

2. WASTE AND EMISSIONS

(a) Waste (including effluent) management

Did the activity produce waste (including rubble) during the construction phase?	YES **X**	**NO**
If yes, indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type?	Unknown m³	
Vegetation removed were not treated as waste but composted and used elsewhere on the farm. Rubble/ rock produced during construction of the lodge will be removed from site by the contractor or used as fill in certain areas on site.		

Does the activity produce waste during its operational phase?	**YES X**	NO
If yes, indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type? Domestic / general waste (food waste and recyclables) will be generated by die lodge and the cottages.	Unknown at this stage m³	

Where and how was/will the waste be treated / disposed of (describe)?		
The general waste will be sorted into recyclables and non-recyclables removed by the Applicant to the Municipal dump site near Diepkloof. The Municipality will remove the waste from the dump site to a registered landfill site. The estimated domestic waste produced by the proposed lodge will be minimal.		
Sewage – use of septic tanks at cottages and a 10 000-litre conservancy tank at the proposed lodge.		
Has the municipality or relevant authority confirmed that sufficient capacity exists for treating / disposing of the waste (to be) generated by this activity(ies)? If yes, provide written confirmation from Municipality or relevant authority	YES	**NO X**
Does/will the activity produce waste that is/will be treated and/or disposed of at another facility other than into a municipal waste stream?	YES	**NO X**
If yes, has this facility confirmed that sufficient capacity exists for treating / disposing of the waste (to be) generated by this activity(ies)? Provide written confirmation from the facility and provide the following particulars of the facility:	YES	NO
Does the facility have an operating license? (If yes, please attach a copy of the license.)	YES	NO

Facility name:	
Contact person:	
Postal address:	
	Postal code:
Telephone:	Cell:
E-mail:	Fax:

Describe the measures that were/will be taken to reduce, reuse or recycle waste:
The general waste will be sorted into recyclables and non-recyclables and removed by the Applicant to the Municipal dump site near Diepkloof. The Municipality will remove the waste from the dump site to a registered landfill site.

(b) Emissions into the atmosphere

Does/will the activity produce emissions that will be disposed of into the atmosphere?	YES	**NO X**
If yes, does it require approval in terms of relevant legislation?	YES	NO
Describe the emissions in terms of type and concentration and how it is/will be treated/mitigated:		

3. WATER USE

Please indicate the source(s) of water for the activity by ticking the appropriate boxes)

Municipal	Water board	Groundwater	**River, Stream, Dam or Lake**	Other	The activity did/does/will not use water
			X		

If water was extracted from a groundwater source, river, stream, dam, lake or any other natural feature, please indicate	
the volume that was extracted per month:	41 406m³ per annum. The volume above the WARMS volume is for domestic use, which is Schedule 1 in terms of the National Water Act, and does not require authorisation.

Please provide proof of assurance of water supply (e.g. Letter of confirmation from municipality / water user associations, yield of borehole) WARMS attached in Appendix M1.		
Did/does the activity require a water use permit / license from DWA?	**YES X**	NO
If yes, please submit a certified copy of the water use permit/license or submit the necessary application to Department of Water Affairs and attach proof thereof to this application, whichever is applicable. WARMS attached in Appendix M1.		
Describe the measures that were/ will be taken to reduce water demand, and measures to reuse or recycle water:		
The dams obtain their water from an eye just upstream. This is the only source of drinking water on site.		
• Landscaping around the lodge will be indigenous, no invasive grasses will be used. Drip irrigation, which is considered more water wise, will be used. • Irrigation water will be measured by installing and operating a self-registering water measuring device. • Irrigation techniques will consider soil type, crop type, soil water status and weather conditions. • Harvesting of rainwater from roofs will be implemented. • Use of grey water from showers/baths will be used for irrigation of gardens.		

4. POWER SUPPLY

Please indicate the source of power supply e.g. Municipality / Eskom / Renewable energy source

The cottages on site are currently on ESKOM power supply. The water from the dams is distributed via solar pump. The solar pump is located adjacent to the dam and measures less than 100m² in extent. The current ESKOM supply won't be able to supply the Lodge.

If power supply is not available, where will power be sourced from?
The cottages on site are currently on ESKOM power supply, with the aim to be placed on solar supply. The new pv panels will be placed on the roof of each cottage. The water from the dams is distributed via solar pump. The solar pump is located adjacent to the dam and measures less than 100m² in extent. The current ESKOM supply won't be able to supply the Lodge, and the costs to develop the ESKOM supply to the site is not considered economically viable. The Lodge will be supplied with solar energy. The proposed pv panels will be placed on the roof of the lodge. Gas geysers and gas stoves will be used in the lodge to reduce reliance on solar energy.

5. ENERGY EFFICIENCY

Describe the design measures, if any, that have been taken to ensure that the activity is energy efficient:
Solar panels will be fixed on the roofs of the cottages to provide power to the existing cottages.
The water from the dams is distributed via solar pump.
The Lodge will be supplied with solar energy. The proposed pv panels will be placed on the roof of the lodge. Gas will be used for cooking and warming of water.

Describe how alternative energy sources have been taken into account or been built into the design of the activity, if any:

The current ESKOM supply is insufficient to supply the site, so the energy supply will be changed to solar to supply houses/ cottages and the lodge. All pv panels will be fixed to roof structures.
The water from the dams is distributed via solar pump which is located adjacent to the dam. The solar pump measures less than 100m²

6. DESCRIPTION AND ASSESSMENT OF THE SIGNIFICANCE OF IMPACTS prior to and after MITIGATION

Please note:

- While sections are provided for impacts on certain aspects of the environment and certain impacts, the sections should also be copied and completed for all other impacts.
- Mitigation measures that were implemented and mitigation measures that are to be implemented should be clearly distinguished.

(a) **Impacts that resulted from the planning, design and construction phases (briefly describe and compare the impacts (as appropriate), significance rating of impacts, proposed mitigation and significance rating of impacts after mitigation that occurred as a result of the planning, design and construction phases.**

Impacts on geographical and physical aspects: N/A	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Impact on biological aspects:	
Nature of impact:	**Removal of indigenous vegetation -** 0.65ha of vegetation clearance around dams, NE firebreak (0.1ha of vegetation loss) cottages area (0.27ha) and access roads clearing. Total clearance of approx. 1.4ha.
Extent and duration of impact:	**Local and Long term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**Possible**
Degree to which the impact may cause irreplaceable loss of resources:	**Possible**
Cumulative impact prior to mitigation:	**Medium negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Likely**
Proposed mitigation:	**Mitigation is proposed during the operational phase**
Cumulative impact post mitigation:	**Low negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Impact on biological aspects:	
Nature of impact:	**Removal of indigenous vegetation -** Clearance of dams and proposed new lodge. Total clearance of approx. 0.05ha.
Extent and duration of impact:	**Local and Long term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**Possible**
Degree to which the impact may cause irreplaceable loss of resources:	**Possible**
Cumulative impact prior to mitigation:	**Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Likely**
Proposed mitigation:	**Mitigation is proposed during the operational phase**
Cumulative impact post mitigation:	**Low negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Impact on biological aspects:	
Nature of impact:	**Faunal Impacts - vegetation loss and habitat disturbance**
Extent and duration of impact:	**Local and Short term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**Possible**
Degree to which the impact may cause irreplaceable loss of resources:	**Possible**
Cumulative impact prior to mitigation:	**Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW TO MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Likely**
Proposed mitigation:	**Mitigation is proposed during the operational phase**
Cumulative impact post mitigation:	**Low negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Impact on biological aspects:	
Nature of impact:	**Faunal Impacts-Access Road clearing**
Extent and duration of impact:	**Local and Long term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**Possible**
Degree to which the impact may cause irreplaceable loss of resources:	**Possible**
Cumulative impact prior to mitigation:	**Medium negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Likely**
Proposed mitigation:	**Mitigation is proposed during the operational phase**
Cumulative impact post mitigation:	**Low negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Impact on biological aspects:	
Nature of impact:	**Faunal Impacts - Clearance of dams**
Extent and duration of impact:	**Local and Short term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**Possible**
Degree to which the impact may cause irreplaceable loss of resources:	**Possible**
Cumulative impact prior to mitigation:	**Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Likely**
Proposed mitigation:	**Mitigation is proposed during the operational phase**
Cumulative impact post mitigation:	**Low negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Impact on biological aspects:	
Nature of impact:	**Disturbance/modification of aquatic habitat as well as flow impacts**
Extent and duration of impact:	**Local and Long term**
Probability of occurrence:	**Probable**
Degree to which the impact can be reversed:	**Partially Reversible**
Degree to which the impact may cause irreplaceable loss of resources:	**Marginal Loss**
Cumulative impact prior to mitigation:	**Medium to Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM TO LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Medium to High**
Proposed mitigation:	• **The dams need not be removed but should be mitigated. A programme should be put in place to remove the invasive alien trees along the riverbanks in this area. The main invasive alien vegetation currently occurring within the disturbed areas on the farm include Port Jackson willows (Acacia saligna), rooikrans**

	(Acacia cyclops), black wattle (Acacia mearnsii), thistle (Cirsium vulgare) and wild tobacco (Nicotiana glauca). • Indigenous vegetation observed along the watercourse that is suitable for revegetation of cleared riparian areas comprises Searsia lucida, Gymnosporia buxifolia, Osteospermum moniliferum, Morella serrata, Ficinia nodosa, Cyprus textilis and Isolepis prolifera. • At least 25% of the flow in the watercourse that enters the dams should be allowed to continue downstream. This downstream flow requirement is important to maintain the downstream wetlands that provide habitat for amphibians and birdlife. The downstream flow requirement should largely be achieved passively by not drawing down the water level in the dam such that it drops below the lower culvert in the dam wall. The culverts should also be kept open and not blocked. • Monitoring of the flow from the culverts in the lower dam wall should be recorded, as well as abstraction from the dam. • It is recommended that there is an approved Maintenance Management Plan in place for the farm that would guide any maintenance activities undertaken in the watercourses.
Cumulative impact post mitigation:	**Low negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Impact on biological aspects:	
Nature of impact:	**Increased abstraction of water for irrigation, domestic and tourism usage**
Extent and duration of impact:	**Local and Long term**
Probability of occurrence:	**Highly probable**
Degree to which the impact can be reversed:	**Likely**
Degree to which the impact may cause irreplaceable loss of resources:	**Likely**
Cumulative impact prior to mitigation:	**Decreased flow downstream of Dam 1 and detrimental effect on downstream wetland areas**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Possible**
Proposed mitigation:	**Outflow from base of Dam 1 to secure ecological 25%; removal of alien vegetation from drainage line and around dams. Removal of alien vegetation from farmland and drainage line areas.**
Cumulative impact post mitigation:	**Decreased flow downstream of Dam 1 but wetland areas not affected and increased ecological functioning in drainage line**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Impact on biological aspects:	
Nature of impact:	**Over exploitation of the resource by extracting more water than the base flow rate. Inflow of effluent and chemicals that have the potential to change the quality of the surface- and groundwater.**
Extent and duration of impact:	**Local and Long term**
Probability of occurrence:	**Probable**
Degree to which the impact can be reversed:	**Moderate**
Degree to which the impact may cause irreplaceable loss of resources:	**Marginal Loss**
Cumulative impact prior to mitigation:	**Medium negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Likely**
Proposed mitigation:	• Monitoring of water resources to prevent over exploitation and avoid surface- and groundwater contamination, through means of prevention when detected early enough. • Avoid spillages in the immediate vicinity of the water resources • Any waste generated should be disposed of accordingly in registered waste (landfill) sites and not dumped on site or the surrounding area. • Stormwater and runoff should be diverted and managed to not come in contact with any waste generated on site.
Cumulative impact post mitigation:	**Low negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Impacts on socio-economic aspects:	
Nature of impact:	**Increased construction traffic to farm along Malgas-Infanta Road**
Extent and duration of impact:	**Local and short term**
Probability of occurrence:	**Probable**
Degree to which the impact can be reversed:	**Not possible**
Degree to which the impact may cause irreplaceable loss of resources:	**Not likely**
Cumulative impact prior to mitigation:	**Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Not likely**
Proposed mitigation:	**-**
Cumulative impact post mitigation:	**Low negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Impacts on socio-economic aspects:	
Nature of impact:	**Employment (direct and indirect) creation during construction**
Extent and duration of impact:	**Local and short term**
Probability of occurrence:	**Likely**
Degree to which the impact can be reversed:	**Not needed**
Degree to which the impact may cause irreplaceable loss of resources:	**Not likely**
Cumulative impact prior to mitigation:	**Low positive**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**
Degree to which the impact can be mitigated:	**Not needed**
Proposed mitigation:	**Not needed**
Cumulative impact post mitigation:	**Low positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**

Impacts on cultural-historical aspects: **No impacts anticipated as confirmed by HWC – refer Appendix M3**	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Noise impacts:	
Nature of impact:	**Noise created during construction**
Extent and duration of impact:	**Local and short term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**Medium**
Degree to which the impact may cause irreplaceable loss of resources:	**No Loss**
Cumulative impact prior to mitigation:	**Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Medium**
Proposed mitigation:	**Keep working hours 7am to 6pm during weekdays, work half day on Saturdays and no work on Sundays or public holidays**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**NEGLIGIBLE**

Visual impacts / Sense of Place:	
Nature of impact:	**Visual Impact during construction activities**
Extent and duration of impact:	**Local and short term**
Probability of occurrence:	**Possible**
Degree to which the impact can be reversed:	**Likely**
Degree to which the impact may cause irreplaceable loss of resources:	**No Loss**
Cumulative impact prior to mitigation:	**Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**NEGLIGIBLE**
Degree to which the impact can be mitigated:	**Possible**
Proposed mitigation:	**Screen buildings with landscaping and use natural colours for walls and roofing**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**NEGLIGIBLE**

(b) **Impacts that result from the operational phase (briefly describe and compare impacts (as appropriate), significance rating of impacts, proposed mitigation and significance rating of impacts after mitigation that are likely to occur as a result of the operational phase.**

Impacts on the geographical and physical aspects: n/a	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Impact on biological aspects:	
Nature of impact:	**Habitat fragmentation and a local increase in alien invasive vegetation caused by soil disturbance - clearance of dams and around dams**
Extent and duration of impact:	**Local and short term**
Probability of occurrence:	**Low**
Degree to which the impact can be reversed:	**Partially Reversible**
Degree to which the impact may cause irreplaceable loss of resources:	**Marginal Loss**
Cumulative impact prior to mitigation:	**Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Not needed**
Proposed mitigation:	**Ongoing alien invasive plant management throughout the greater property and within 100m of all study areas, and natural (passive) rehabilitation of the recently cleared areas (except the access track).**
Cumulative impact post mitigation:	**Low positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**

Impact on biological aspects:	
Nature of impact:	**Habitat fragmentation and a local increase in alien invasive vegetation caused by soil disturbance-** NE firebreak
Extent and duration of impact:	**Local and medium term**
Probability of occurrence:	**Probable**
Degree to which the impact can be reversed:	**Partially Reversible**
Degree to which the impact may cause irreplaceable loss of resources:	**Marginal Loss**
Cumulative impact prior to mitigation:	**Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW TO MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Not needed**
Proposed mitigation:	**Ongoing alien invasive plant management throughout the greater property and within 100m of all study areas, and natural (passive) rehabilitation of the recently cleared areas (except the access track).**
Cumulative impact post mitigation:	**Low positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**

Impact on biological aspects:	
Nature of impact:	**Habitat fragmentation and a local increase in alien invasive vegetation caused by soil disturbance**- Access road clearing
Extent and duration of impact:	**Local and Long term**
Probability of occurrence:	**Probable**
Degree to which the impact can be reversed:	**Partially Reversible**
Degree to which the impact may cause irreplaceable loss of resources:	**Marginal Loss**
Cumulative impact prior to mitigation:	**Medium negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Not needed**

Proposed mitigation:	**Ongoing alien invasive plant management throughout the greater property and within 100m of all study areas, and natural (passive) rehabilitation of the recently cleared areas (except the access track).**
Cumulative impact post mitigation:	**Low positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**

Impact on biological aspects:	
Nature of impact:	**Habitat fragmentation and a local increase in alien invasive vegetation caused by soil disturbance**- Cottages and parking/utility building and new proposed lodge
Extent and duration of impact:	**Local and Long term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**Partially Reversible**
Degree to which the impact may cause irreplaceable loss of resources:	**Marginal Loss**
Cumulative impact prior to mitigation:	**Medium negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Not needed**
Proposed mitigation:	**Ongoing alien invasive plant management throughout the greater property and within 100m of all study areas, and natural (passive) rehabilitation of the recently cleared areas (except the access track).**
Cumulative impact post mitigation:	**Medium negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Impact on biological aspects:	
Nature of impact:	**Opportunity to improve function and habitat through the proposed mitigation measures**
Extent and duration of impact:	**Site and long term**
Probability of occurrence:	**Possible**
Degree to which the impact can be reversed:	**Partially Reversible**
Degree to which the impact may cause irreplaceable loss of resources:	**Marginal Loss**
Cumulative impact prior to mitigation:	**Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**High**
Proposed mitigation:	**Control of invasive alien vegetation** **Ensure downstream flow requirements are met.** **It is recommended that there is an approved Maintenance Management Plan in place for the farm**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**NEGLIGIBLE**

Impact on biological aspects:	
Nature of impact:	**Over exploitation of the resource by extracting more water than the base flow rate. Inflow of effluent and chemicals that have the potential to change the quality of the surface- and groundwater.**
Extent and duration of impact:	**Site and long term**
Probability of occurrence:	**Possible**
Degree to which the impact can be reversed:	**Partially Reversible**
Degree to which the impact may cause irreplaceable loss of resources:	**Marginal Loss**
Cumulative impact prior to mitigation:	**Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**High**
Proposed mitigation:	• **Monitoring of water resources to prevent over exploitation and avoid surface and groundwater contamination, through means of prevention when detected early enough.** • **Avoid spillages in the immediate vicinity of the water resources** • **Any waste generated should be disposed of accordingly in registered waste (landfill) sites and not dumped on site or the surrounding area.** • **Stormwater and runoff should be diverted and managed to not come in contact with any waste generated on site.**
Cumulative impact post mitigation:	**Low negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Impacts on the socio-economic aspects:	
Nature of impact:	**Employment (direct and indirect) creation**
Extent and duration of impact:	**Local and long term**
Probability of occurrence:	**Likely**
Degree to which the impact can be reversed:	**Not needed**
Degree to which the impact may cause irreplaceable loss of resources:	**Not likely**
Cumulative impact prior to mitigation:	**Low positive**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**
Degree to which the impact can be mitigated:	**Not needed**
Proposed mitigation:	**Not needed**
Cumulative impact post mitigation:	**Low positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**

Impacts on the socio-economic aspects:	
Nature of impact:	Proposed tourism accommodation facilities in close proximity to the De Hoop Nature Reserve (a World Heritage Site and Protected Area) and a National Protected Area Expansion Strategy Focus area: **Increase in the number of tourists visiting the area.**
Extent and duration of impact:	**Local and long term**
Probability of occurrence:	**Probable**
Degree to which the impact can be reversed:	**Not needed**
Degree to which the impact may cause irreplaceable loss of resources:	**Not likely**
Cumulative impact prior to mitigation:	**Low to Medium positive**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW TOMEDIUM POSITIVE**
Degree to which the impact can be mitigated:	**Not needed**
Proposed mitigation:	**Not needed**
Cumulative impact post mitigation:	**Low to Medium positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW TO MEDIUM POSITIVE**

Impacts on the socio-economic aspects:	
Nature of impact:	Proposed tourism accommodation facilities in close proximity to the De Hoop Nature Reserve (a World Heritage Site and Protected Area) and a National Protected Area Expansion Strategy Focus area: **Impact on road network**
Extent and duration of impact:	**Local and long term**
Probability of occurrence:	**Probable**
Degree to which the impact can be reversed:	**Medium**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss**
Cumulative impact prior to mitigation:	**Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE TO NEGLIGIBLE**
Degree to which the impact can be mitigated:	**Medium**
Proposed mitigation:	**The lodge will only consist of 10 rooms, therefore a maximum of 10 additional cars is likely to make use of road at one given period. This additional impact on the road is unlikely to be significant.**
Cumulative impact post mitigation:	**Low negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE TO NEGLIGIBLE**

Impacts on the socio-economic aspects:	
Nature of impact:	Proposed tourism accommodation facilities in close proximity to the De Hoop Nature Reserve (a World Heritage Site and Protected Area) and a National Protected Area Expansion Strategy Focus area: **Impact on conservation of these areas**
Extent and duration of impact:	**Local and long term**
Probability of occurrence:	**Unlikely**
Degree to which the impact can be reversed:	**Not needed**
Degree to which the impact may cause irreplaceable loss of resources:	**No Loss**
Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**NEGLIGIBLE**
Degree to which the impact can be mitigated:	**Low**
Proposed mitigation:	**Lodge should display information regarding the nearby De Hoop Nature Reserve**
Cumulative impact post mitigation:	**Negligible to Low positive**

Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**

Impacts on the socio-economic aspects:	
Nature of impact:	Proposed tourism accommodation facilities in close proximity to the De Hoop Nature Reserve (a World Heritage Site and Protected Area) and a National Protected Area Expansion Strategy Focus area: **Competition to the De Hoop Nature Reserve**
Extent and duration of impact:	**Local and long term**
Probability of occurrence:	**Likely**
Degree to which the impact can be reversed:	**Not needed**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss**
Cumulative impact prior to mitigation:	**Low positive**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**
Degree to which the impact can be mitigated:	**Not needed**
Proposed mitigation:	**Not needed**
Cumulative impact post mitigation:	**Low positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**

Impacts on the cultural-historical aspects: No impacts anticipated as per HWC reply (refer Appendix M3)	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Noise impacts: No noise impacts anticipated	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Visual impacts / Sense of Place:	
Nature of impact:	**Visual impact of Lodge**
Extent and duration of impact:	**Local and long term**
Probability of occurrence:	**Possible**
Degree to which the impact can be reversed:	**Likely**
Degree to which the impact may cause irreplaceable loss of resources:	**No Loss**
Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**NEGLIGIBLE**
Degree to which the impact can be mitigated:	**Possible**
Proposed mitigation:	**Screen buildings with landscaping and use natural colours for walls and roofing**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**NEGLIGIBLE**

NO-GO Alternative	
Nature of impact:	**Extensive ongoing alien plant invasion and less job opportunities**

Extent and duration of impact:	**Site, local and long term**
Probability of occurrence:	**Highly Probably**
Degree to which the impact can be reversed:	**Medium**
Degree to which the impact may cause irreplaceable loss of resources:	**Marginal Loss**
Cumulative impact prior to mitigation:	**Low to Medium Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW TO MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Possible**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**Low to Medium Negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW TO MEDIUM NEGATIVE**

(c) Impacts that may result from the decommissioning and closure phase (briefly describe and compare the potential impacts (as appropriate), significance rating of impacts, proposed mitigation and significance rating of impacts after mitigation that are likely to occur as a result of the decommissioning and closure phase.

Potential impacts on the biophysical aspects:	
Nature of impact:	**Removal of infrastructure on site and closure of lodge; rehabilitation of roads**
Extent and duration of impact:	**Local and long term**
Probability of occurrence:	**Likely**
Degree to which the impact can be reversed:	**n/a**
Degree to which the impact may cause irreplaceable loss of resources:	**Not likely**
Cumulative impact prior to mitigation:	**Low positive**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**
Degree to which the impact can be mitigated:	**Not needed for vegetation establishment Likely for Waste increase**
Proposed mitigation:	**Recycle/ reuse building material where possible to minimise disposal to landfill**
Cumulative impact post mitigation:	**Low positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**

Potential impacts on the socio-economic aspects:	
Nature of impact:	**Decrease in local employment after closure of lodge and farm**
Extent and duration of impact:	**Local and long term**
Probability of occurrence:	**Likely**
Degree to which the impact can be reversed:	**Not likely**
Degree to which the impact may cause irreplaceable loss of resources:	**Not likely**
Cumulative impact prior to mitigation:	**Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Possible**
Proposed mitigation:	**Re-establish farming activities on site for alternative employment opportunities**
Cumulative impact post mitigation:	**Low negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Potential impacts on the socio-economic aspects:	
Nature of impact:	**Decrease in local trade and tourism after closure of lodge and farm**
Extent and duration of impact:	**Local and long term**
Probability of occurrence:	**Likely**
Degree to which the impact can be reversed:	**Not likely**
Degree to which the impact may cause irreplaceable loss of resources:	**Not likely**
Cumulative impact prior to mitigation:	**Low negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Possible**
Proposed mitigation:	**Re-establish farming activities on site for alternative employment opportunities**
Cumulative impact post mitigation:	**Low negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Potential impacts on the cultural-historical aspects: **No impacts anticipated as per HWC reply- refer Appendix M3**	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	

Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential noise impacts: No impacts anticipated from decommissioning and closure phase	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential visual impacts:	
Nature of impact:	**Removal of infrastructure and lodge after closure and decommissioning**
Extent and duration of impact:	**Local and long term**
Probability of occurrence:	**Likely**
Degree to which the impact can be reversed:	**Not needed**
Degree to which the impact may cause irreplaceable loss of resources:	**Not likely**
Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**NEGLIGIBLE**
Degree to which the impact can be mitigated:	**Not needed**
Proposed mitigation:	**n/a**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**NEGLIGIBLE**

(d) Any other impacts: None identified at this time

Potential impact:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Please note: If any of the above information is not available, specialist input may be requested.

SPECIALIST INPUTS/STUDIES AND RECOMMENDATIONS

Please note: Specialist inputs/studies that will be undertaken as part of this application. These specialist inputs/studies must take into account the Department's relevant Guidelines on the Involvement of Specialists in EIA Processes available on the Department's website (**http://www.capegateway.gov.za/eadp**). A summary of all the specialist inputs/studies must be provided with the additional information.

Specialist inputs/studies and recommendations:

Mitigation according to Botanical report:

- All woody invasive alien vegetation (notably Acacia cyclops, A. mearnsii and A. saligna) within 100m of all footprints noted in this report (i.e. new houses, scraped areas around dams, new access road, eastern boundary fence) must be felled, using appropriate methodology (following best practise as outlined in Martens et al 2021). No heavy machinery may be used, and stems should be cut at close to ground level and immediately painted (not sprayed) with a suitable herbicide such as Garlon (but this not necessary for rooikrans). This must be completed within one year of the date of this report and should be audited by CapeNature.
- A team trained in invasive alien invasive plant management (see Martens et al 2021) should be appointed to remove all woody alien invasive species on the on the applicant property (section of Rem of Ptn 1 south of Breede R and north of road to Cape Infanta) over the next three years, as well as all seedlings of invasive alien Acacia species, such that there is less than 1% overall woody alien vegetation cover on the property. The least densely invaded areas should be cleared first, as this is the most cost and ecologically effective strategy. This must be completed within three years of the date of this report and should be audited by CapeNature. If not adequately completed within three years, the DEA&DP or similar authority should be tasked with enforcing this.
- No spraying of herbicide should be allowed anywhere where there is any natural vegetation and should thus be restricted to designated cultivation areas.
- Any future clearing of firebreaks on the property must be done by brushcutting, to a height of no lower than 10cm. No soil disturbance should be allowed (hence no scraping by machinery), as this encourages alien plant invasion.
- All natural vegetation in moderate to good condition on the applicant property (between Breede River and Infanta Rd; about 200ha) should be signed up with CapeNature's Stewardship program within one year of any authorisation, with the applicant being responsible for all costs associated with this registration, and all Stewardship site management costs going forward.

Mitigation according to Freshwater Ecological report:

- It is preferred that water be obtained from the surface water and out of the dams than drawing down the groundwater table through the abstraction of a borehole in the area. The contact springs on the property and surrounding areas are essential in supporting many groundwater-dependent ecosystems.
- The dams need not be removed but should be mitigated by implementing aquatic ecosystem related mitigation measures as outlined below.
- A programme should be put in place to remove the invasive alien trees along the riverbanks in this area. The main invasive alien vegetation currently occurring within the disturbed areas on the farm include Port Jackson willows (Acacia saligna), rooikrans (Acacia cyclops), black wattle (Acacia mearnsii), thistle (Cirsium vulgare) and wild tobacco (Nicotiana glauca).
- Indigenous vegetation observed along the watercourse that is suitable for revegetation of cleared riparian areas comprises Searsia lucida, Gymnosporia buxifolia, Osteospermum moniliferum, Morella serrata, Ficinia nodosa, Cyprus textilis and Isolepis prolifera.
- At least 25% of the flow in the watercourse that enters the dams should be allowed to continue downstream. This downstream flow requirement is important to maintain the downstream wetlands that provide habitat for amphibians and birdlife. The downstream flow requirement should largely be achieved passively by not drawing down the water level in the dam such that it drops below the lower culvert in the dam wall. The culverts should also be kept open and not blocked.
- Monitoring of the flow from the culverts in the lower dam wall should be recorded, as well as abstraction from the dam.
- It is recommended that there is an approved Maintenance Management Plan in place for the farm that would guide any maintenance activities undertaken in the watercourses.

Mitigation according to Hydrological report:

- Monitoring the overflow of the dams should be done on a regular basis to ensure that a constant base flow is maintained;
- The flow should be recorded and a base flow of at least $10m^3$ per day should be allowed through the overflow of the lower dam into the downstream section of this tributary;
- Surface water quality should be monitored to ensure that surface water contamination does not take place;
- The water monitoring plan should be revised on a regular basis to incorporate the changes in the water flow regime;
- Regular inspections should be undertaken of any access roads and stormwater management systems for signs of erosion and sedimentation;
- Regularly inspect all vehicles used in the catchment area for leaks to prevent ingress of hydrocarbons into topsoil;
- If any spills occur, they should be immediately cleaned up;
- Utmost care must be taken to ensure the runoff water does not pollute the watercourses.

Socio-economic Mitigation:

- Information signage should be placed at the lodge educating visitors on the De Hoop Nature Reserve.
- Members of the nearby communities must be given priority for employment, where possible.

8. IMPACT ASSESSMENT SUMMARY

Briefly describe the impacts (as appropriate), significance rating of impacts, mitigation and significance rating of impacts of the activity. This must include an assessment of the significance of all impacts.

Impacts	Significance rating of impacts after mitigation
Impacts that resulted from the planning, design and construction phases	
Removal of indigenous vegetation - 0.65ha of vegetation clearance around dams, NE firebreak (0.1ha of vegetation loss) cottages area (0.27ha) and access roads clearing. Total clearance of approx. 1.4ha.	LOW NEGATIVE
Removal of indigenous vegetation - Clearance of dams and proposed new lodge. Total clearance of approx. 0.05ha.	LOW NEGATIVE
Faunal Impacts- vegetation loss and habitat disturbance	LOW NEGATIVE
Faunal Impacts- Access Road clearing	LOW NEGATIVE
Faunal Impacts- clearance of dams	LOW NEGATIVE
Disturbance/modification of aquatic habitat as well as flow impacts	LOW NEGATIVE
Increased abstraction of water for irrigation, domestic and tourism usage	LOW NEGATIVE
Over exploitation of the resource	LOW NEGATIVE
Increased construction traffic to farm along Malgas-Infanta Road	LOW NEGATIVE
Employment (direct and indirect) creation during construction	LOW POSITIVE
Noise created during construction	NEGLIGIBLE
Visual impact from lodge and increased infrastructure on site	NEGLIGIBLE
Impacts that result from the operational phase	
Habitat fragmentation and a local increase in alien invasive vegetation caused by soil disturbance 0 access road, NE firebreak and dams	LOW POSITIVE
Habitat fragmentation and a local increase in alien invasive vegetation caused by soil disturbance – cottages area and lodge	LOW NEGATIVE
Fire suppression around built infrastructure	LOW - MEDIUM NEGATIVE
Opportunity to improve function and habitat through the proposed mitigation measures	NEGLIGIBLE
Over exploitation of the resource	LOW NEGATIVE
Employment (direct and indirect) creation	LOW POSITIVE
Impact on nearby Protected Area: Benefit to local trade and tourism market	LOW TO MEDIUM POSITIVE
Impact on nearby Protected Area: Impact on roads	LOW NEGATIVE TO NEGLIGIBLE
Impact on nearby Protected Area: Impact on conservation of these areas	LOW POSITIVE
Impact on nearby Protected Area: Competition to nearby conservation areas	LOW POSITIVE
Visual impact from lodge and increased infrastructure on site	NEGLIGIBLE
Impacts that may result from the decommissioning and closure phase	
Removal of infrastructure on site and closure of lodge; rehabilitation of roads	LOW POSITIVE
Decrease in local employment after closure of lodge and farm	LOW NEGATIVE
Decrease in local trade and tourism after closure of lodge and farm	LOW NEGATIVE
Visual - Removal of infrastructure and lodge after closure and decommissioning	NEGLIGIBLE
Impacts associated with the No-Go Alternative	
Extensive ongoing alien plant invasion and less job opportunities	LOW TO MEDIUM NEGATIVE

9. SUMMARY OF THE CONSEQUENCES OF/ IMPACTS OF THE UNLAWFULLY COMMENCED ACTIVITY/IES

Please provide a detailed summary of the consequences/impacts of commencement of the activity/ies on the environment.

IMPACTS ON AQUATIC FEATURES

The aquatic ecosystem assessment determined the river to be moderately modified and of moderate ecological importance and sensitivity with a target ecological condition of largely natural to moderately modified. This is largely due to the disturbance and loss of riparian vegetation along the watercourse and its replacement with alien vegetation. Removal of alien vegetation removal along the riverbanks is being undertaken and can be expected to improve the ecological integrity of the river over the long term.

Past imagery for the farm indicates that the tributary at the dam sites has long been disturbed. The recent works have taken place within these already disturbed areas and thus have not resulted in any further degradation of the river system.

The dams appear to have been constructed within the watercourse prior to 1940 but were not maintained for a long period until 2019/2020.

The dams have also not resulted in any significant impact on the flow in the associated watercourse. The catchment of the dam is less than 0.95 km^2 and generates a runoff of approximately 120 000 m^3. The dams have a combined storage of less than 10 000m^3 and thus do not impact significantly on the medium to high flows (The actual calculated capacity is at 4130m^3, and is the volumes being applied for in the WULA.). There is also an approx. 300 – 400 mm outlet pipe in the dam wall that allows a constant release into the downstream watercourse during low flow conditions, with a second one at a slightly higher level that allows for further downstream flow releases in higher flow conditions.

The removal of alien vegetation within the drainage line downstream of Dam 1 allows increased ecological functioning and water conservation.

It is preferred that water be obtained from the surface water and out of the dams than drawing down the groundwater table through the abstraction of a borehole in the area. The contact springs on the property and surrounding areas are essential in supporting many groundwater-dependent ecosystems.

The initial Freshwater Assessment found that the new cottages and the parking/utility building lie on the hill tops and more than 80m from the watercourses and are thus deemed to have had no impact on the aquatic features. A recent site visit by the EAP has confirmed that the most easterly cottage is within 32m of a drainage line. This was communicated to the specialist who then confirmed the 20m vegetation buffer is sufficient and the assessment would not change (refer Appendix H1).

IMPACTS ON VEGETATION

Botanical impacts associated with the development of an area may be both direct and indirect, with the former occurring mostly at the construction stage and the latter mostly at the operational stage. Direct impacts may be both permanent and long term. All impacts in this case are negative, although proposed/required mitigation would have notable positive impacts.

Construction Phase Impacts (Direct Impacts)
In this instance the primary direct impacts have already occurred, being the temporary degradation and/or clearing of about 0.6ha of previously largely natural Eastern Ruens Shale Renosterveld (although officially mapped as Potberg Ferricrete Fynbos) adjacent to dams 1 and 2, permanent loss of about 0.35ha of vegetation in the access road area, and long term to permanent loss of about 0.1ha of Eastern Ruens Shale Renosterveld (although officially mapped as Potberg Ferricrete Fynbos) in the northeastern firebreak area.

Additional impacts here assessed include damage to vegetation within the enlarged dam footprints. The status of the vegetation in the impacted areas is complicated by the fact that most of it is formally mapped as Potberg Ferricrete Fynbos but is in fact arguably better classified as eastern Ruens Shale Renosterveld. The assessment is further complicated by the fact that Potberg Ferricrete Fynbos is gazetted as Endangered on a national basis (DEA 2011) but has been downlisted to Vulnerable by Skowno et al (2019), although this change is not yet gazetted. In any event, most of the disturbance can be said to have taken place in nationally threatened vegetation types.

Essentially all of the dam clearing activity was undertaken in areas mapped as CBA1, but the northeastern firebreak was mostly cleared in area mapped as CBA2, and the access road is partly ONA, partly CBA and partly unmapped.

Only 3 plant Species of Conservation Concern were recorded in (or next to) the access road area and in (or next to) the areas cleared around the dams, and a further 1 or 2 may have occurred in the area cleared for the firebreak. The impact on plant SCC of all the elements assessed is deemed to be Low, and in fact 2 of the 3 SSC have already re-established in the cleared areas around the dams and their populations are likely to increase in this area.

The removal of natural vegetation in the areas next to the dams generally did not significantly disturb the upper soil layer, except in occasional areas (maybe <10% of total cleared area). This means that the clearing effectively removed all the vegetation above ground, but in most cases did not significantly disturb the seed bank, roots or underground storage organs of the indigenous species. In many respects it was thus akin to very close brushcutting of the vegetation, even though a brushcutter was not used. Natural rehabilitation is thus predicted to be good (Helme & Rebelo 2016), and there is already plenty of evidence of this on site, some 2 to 2.5 years after clearing.
The clearing of the vegetation in the road and firebreak areas appears to have been more comprehensive, especially in the former (not surprisingly). There is thus negligible natural rehabilitation (current and expected) in the road area, and only minor rehabilitation in the firebreak area, although the latter is expected to largely recover over a period of 7-10yrs, if not further disturbed.

The magnitude of the impacts ranges from Medium (ecological functioning previously present in the cleared areas will be partly disturbed) to High (no functioning), duration will be short to permanent (3-10yrs to natural recovery, but>10yrs for road), and extent will be site specific (local). No permanent loss of species or SCC is likely, provided that the cleared areas are allowed to rehabilitate naturally (excluding the access road, where it is not known if any SCC were present prior to clearing, but it seems unlikely that they were).

In the case of the cottages area the construction phase botanical and faunal impacts are likely to have been Low to Medium negative, given that the site was largely natural vegetation prior to 2021, and most of it was a mapped CBA1 with natural vegetation.

In the case of the proposed lodge area, the future construction phase botanical and faunal impacts should be Low negative, given that the sites are already largely disturbed.

The overall construction phase impacts would be Low to Medium negative, before and after mitigation. Adequate and appropriate mitigation is only likely to be viable at the operational phase, primarily in the form of natural rehabilitation of disturbed areas and extensive alien vegetation removal on the site.

Operational Phase Impacts
The primary indirect botanical impacts (post clearing) are habitat fragmentation, and further invasion of alien species, which is facilitated by the partial soil disturbance caused by the mechanical clearing, especially when combined with no stump poisoning of large Port Jackson and black wattle trees (which will thus resprout). The former cannot be mitigated (natural rehabilitation will mitigate this naturally over time), but the latter can be successfully mitigated by proper alien invasive plant management of the remaining natural areas (see Martins et al 2021 for required methodology). Expected significance of these impacts is **Low - Medium negative** before mitigation, and Low positive after mitigation.

In the case of built infrastructure (proposed lodge and new cottages area) this is likely to result in fire suppression around these areas, which if it goes on for too long (>15-20yrs) will have negative ecological impacts, as these are fire adapted ecosystems which require regular fire for optimal ecological functioning. This is likely to have a local **Low - Medium negative** botanical impact and is unlikely to be actively mitigated (in the form of controlled burns), as landowners are typically reluctant to undertake such due to legal liability concerns.

The operational phase impacts of the firebreak clearing along the eastern fence should be negligible if it doesn't happen again but could be **Low - Medium negative** if it is repeated.

The proposed irrigation of currently fallow or cultivated land on the property was mentioned as a possible impact to be assessed. However, without any details on the total proposed areas this cannot be assessed in any detail, except to say that it is unlikely to have any direct negative faunal or botanical impacts. However, if large quantities of water are to be abstracted from the catchment, then this is a potential indirect negative ecological impact, and should be investigated at a catchment level, by a competent geohydrologist, as there are already clear drying impacts evident in the wetlands in the area habitat fragmentation and a local increase in alien invasive vegetation caused by soil disturbance associated with construction. Mitigation would be implementation of ongoing alien invasive plant management throughout the greater property and within 100m of all study areas, and natural (passive) rehabilitation of the recently cleared areas (except the access track).

FAUNAL IMPACTS

No significant faunal impacts are likely to have arisen as a result of the vegetation clearing next to the dams or in the road footprints, largely because the noise associated with such would have caused most of the fauna to vacate the area and move to suitable nearby habitat, which is still available. The clearing out of the dams would have temporarily disturbed the fauna in these areas, but appears to have recovered fully and quickly, as would be expected.

The impact of the assessed activities on fauna would seem to be **low**, with a healthy population of 4 frog species currently in the dams, and all the expected waterbirds in and around the dams. No animals are likely to have been permanently and negatively impacted by any of the activities, although the road and firebreak construction may have caused some loss of less mobile taxa (eg. slow moving ants or beetles), and others would have moved away. No faunal SCC are likely to have been permanently impacted by the activities, although some may have been temporarily impacted to a low level. In general, the faunal impacts

are likely to have been of **Low to Medium negative** significance, and **Low negative** after mitigation (operational phase alien clearing).

No faunal SoCC are likely to be permanently present with the proposed footprints for the lodge nor for the cottages, but some may occasionally be present in the eastern firebreak area but would not have been negatively impacted in the long term by the clearing of the firebreak. None of the proposed or existing development footprints would need specific buffers in order to mitigate further likely negative impacts on any of the faunal SoCC, largely because all the SoCC are highly mobile and can, and essentially do self-buffer, by moving to the most suitable habitats.

POTENTIAL HYDROLOGICAL IMPACTS

Over exploitation of the resource by extracting more water than the base flow rate.

The discharge from rainfall in the catchment area and flow from the springs have a finite contribution in terms of discharge volume. Over exploitation may cause termination of flow in the valley below the dams.

Inflow of effluent and chemicals that have the potential to change the quality of the surface- and groundwater.

Sandstone outcrop in the study area can create a potential impact where a preferential path can be created where the potential leachate from livestock and game manure as well as pollutants from vehicles can pollute the surface- and groundwater by changing the quality of the water.

SOCIO-ECONOMIC IMPACTS
Employment opportunities (direct and indirect) ill be created in the construction phase and the operational phase. The lodge and seasonal hunting activities will also complement the tourism sector in the area and stimulate additional services and trade (e.g. shops, wineries and restaurants). The lodge will attract more visitors to the area during the winter months (hunting season) when the tourist numbers are typically lower.

The guests at the proposed lodge are likely to visit the De Hoop Nature Reserve, resulting in an increase in day visitors to the Nature Reserve. Furthermore, visitors may prefer to return to the Nature Reserve in the future. Since a different experience will be offered at the proposed lodge, it is unlikely to be competition to the nearby Nature Reserve.

While the lodge is in close proximity to the Protected Area and World Heritage Site, it will not have any negative impacts on the conservation of the Nature Reserve. The proposed lodge is small and will not be nuisance to the Protected Area in terms of noise and light pollution. It is separated from the Protected Area by the Infanta Road and farming land. Guests can therefore not access the Protected Area. Furthermore, services of the lodge will not impact the Protected Area. The site will be managed as per the Game Management Plan. The informal conservation on the remaining area on the site will be encouraged thereby complying with the National Protected Area Expansion Strategy.

The lodge will only consist of 10 rooms, therefore a maximum of 10 additional cars is likely to make use of road at one given period. This additional impact on the road will be insignificant.

10. OTHER MANAGEMENT, MITIGATION AND MONITORING MEASURES

(a) Over and above the mitigation measures described above, please indicate any additional management, mitigation and monitoring measures.

An EMPr and MMP was developed for the site and includes extensive management, mitigation and monitoring measures – refer to Appendix I1 and I2.

- The Applicant/owner of the lodge must regularly service the conservancy tank proposed to deal with the sewage generated by the lodge.
- Close and rehabilitate any old and unused roads on site.
- Any additional disturbance footprints relating to the lodge, owner's cottages and dams must be rehabilitated.
- No further indigenous vegetation clearance outside of approved footprints may be allowed.
- Water consumption from dams should be measured monthly and reported to BOCMA.
- Alien vegetation removal in terrestrial areas should be another focus point to improve overall ecological function.
- The EMPr must be implemented.
- A suitably qualified ECO must be appointed to oversee construction activities.
- The proposed MMP should be adopted and implemented on site – alien vegetation removal in dams and drainage lines is vital to conserve water within the system.
- The landowner should belong to the Greater Overberg Fire Protection Agency (GOFPA).
- All natural vegetation in moderate to good condition on the applicant property (between Breede River and Infanta Rd; about 200ha) should be signed up with CapeNature's Stewardship program within one year of any authorisation,

with the applicant being responsible for all costs associated with this registration, and all Stewardship site management costs going forward.

(b) Describe the ability of the applicant to implement the management, mitigation and monitoring measures.

The applicant is able to implement the management, monitoring and mitigation measures as prescribed by the EAP in this document and the accompanying EMPr and MMP.
The applicant has both displayed a willingness to comply and is financially able to implement the requirements.

Please note: A draft **ENVIRONMENTAL MANAGEMENT PROGRAMME** is attached to this application as **Appendix I**.

SECTION G: ASSESSMENT METHODOLOGIES AND CRITERIA, GAPS IN KNOWLEDGE, UNDERLYING ASSUMPTIONS AND UNCERTAINTIES

(a) Please describe adequacy of the assessment methods used.

It is the opinion of the EAP that the assessment methods used was adequate. After ranking of the evaluation of the components (variables) on a scale for each potential impact, the significance of each potential impact was calculated.
The specialist reports were also seen as adequate and addressed the illegal and planned activities on site, assessed the impacts and proposed management and mitigation measures.

(b) Please describe the assessment criteria used.

IMPACT RATING METHODOLOGY

THE SIGNIFICANCE OF EACH IMPACT IDENTIFIED WAS ASSESSED ACCORDING TO THE FOLLOWING VARIABLES (EVALUATION COMPONENTS):

SIGNIFICANCE IS THE PRODUCT OF ***PROBABILITY AND SEVERITY***. PROBABILITY DESCRIBES THE LIKELIHOOD OF THE IMPACT ACTUALLY OCCURRING, AND IS RATED AS FOLLOWS:

PROBABILITY

PROBABILITY		
IMPROBABLE	LOW POSSIBILITY OF IMPACT TO OCCUR EITHER BECAUSE OF DESIGN OR HISTORIC EXPERIENCE.	RATING = 1
PROBABLE	DISTINCT POSSIBILITY THAT IMPACT WILL OCCUR.	RATING = 2
HIGHLY PROBABLE	MOST LIKELY THAT IMPACT WILL OCCUR.	RATING = 3
DEFINITE	IMPACT WILL OCCUR, IN THE CASE OF ADVERSE IMPACTS REGARDLESS OF ANY PREVENTION MEASURES.	RATING = 4

THE ***SEVERITY FACTOR*** IS CALCULATED FROM THE FACTORS GIVEN TO "***INTENSITY" AND "DURATION***". INTENSITY AND DURATION FACTORS ARE AWARDED TO EACH IMPACT, AS DESCRIBED BELOW.

THE ***INTENSITY FACTOR*** IS AWARDED TO EACH IMPACT ACCORDING TO THE FOLLOWING METHOD:

INTENSITY FACTOR		
LOW INTENSITY	NATURAL AND MAN-MADE FUNCTIONS NOT AFFECTED.	FACTOR 1
MEDIUM INTENSITY	ENVIRONMENT AFFECTED BUT NATURAL AND MAN-MADE FUNCTIONS AND PROCESSES CONTINUE.	FACTOR 2
HIGH INTENSITY	ENVIRONMENT AFFECTED - NATURAL OR MAN-MADE FUNCTIONS ARE ALTERED TO THE EXTENT THAT IT WILL TEMPORARILY OR PERMANENTLY CEASE OR BECOME DYSFUNCTIONAL.	FACTOR 3

DURATION IS ASSESSED AND A FACTOR AWARDED IN ACCORDANCE WITH THE FOLLOWING:

DURATION		
SHORT TERM	<1 TO 5 YEARS	FACTOR 1
MEDIUM TERM	5 TO 15 YEARS	FACTOR 2
LONG TERM	IMPACT WILL ONLY CEASE AFTER THE OPERATIONAL LIFE OF THE ACTIVITY, EITHER BECAUSE OF NATURAL PROCESS OR BY HUMAN INTERVENTION	FACTOR 3
PERMANENT	MITIGATION, EITHER BY NATURAL PROCESS OR BY HUMAN INTERVENTION, WILL NOT OCCUR IN SUCH A WAY OR IN SUCH A TIME SPAN THAT THE IMPACT CAN BE CONSIDERED TRANSIENT	FACTOR 4

THE ***SEVERITY RATING*** IS OBTAINED FROM CALCULATING A SEVERITY FACTOR AND COMPARING THE SEVERITY FACTOR TO THE RATING IN THE TABLE BELOW. FOR EXAMPLE:

THE SEVERITY FACTOR = INTENSITY FACTOR X DURATION FACTOR
= 2 X 3
= 6

A ***SEVERITY FACTOR*** OF SIX (6) EQUALS A SEVERITY RATING OF MEDIUM SEVERITY (RATING 3) AS PER TABLE BELOW:

RATING	**FACTOR**
LOW SEVERITY (RATING 2)	CALCULATED VALUES 2 TO 4
MEDIUM SEVERITY (RATING 3)	CALCULATED VALUES 5 TO 8
HIGH SEVERITY (RATING 4)	CALCULATED VALUES 9 TO 12
VERY HIGH SEVERITY (RATING 5)	CALCULATED VALUES 13 TO 16

SEVERITY FACTORS BELOW 3 INDICATE NO IMPACT

A SIGNIFICANCE RATING IS CALCULATED BY MULTIPLYING THE SEVERITY RATING WITH THE PROBABILITY RATING.

THE ***SIGNIFICANCE RATING*** SHOULD INFLUENCE THE DEVELOPMENT PROJECT AS DESCRIBED BELOW:

SIGNIFICANCE RATING		
LOW SIGNIFICANCE	CALCULATED SIGNIFICANCE RATING 4 TO 6	POSITIVE IMPACT AND NEGATIVE IMPACTS OF LOW SIGNIFICANCE SHOULD HAVE NO INFLUENCE ON THE PROPOSED DEVELOPMENT PROJECT.
MEDIUM SIGNIFICANCE	CALCULATED SIGNIFICANCE RATING >6 TO 15	POSITIVE IMPACT: SHOULD WEIGH TOWARDS A DECISION TO CONTINUE NEGATIVE IMPACT: SHOULD BE MITIGATED TO A LEVEL WHERE THE IMPACT WOULD BE OF MEDIUM SIGNIFICANCE BEFORE PROJECT CAN BE APPROVED.
HIGH SIGNIFICANCE	CALCULATED SIGNIFICANCE RATING 16 AND MORE	POSITIVE IMPACT: SHOULD WEIGH TOWARDS A DECISION TO CONTINUE, SHOULD BE ENHANCED IN FINAL DESIGN. NEGATIVE IMPACT: SHOULD WEIGH TOWARDS A DECISION TO TERMINATE PROPOSAL, OR MITIGATION SHOULD BE PERFORMED TO REDUCE SIGNIFICANCE TO AT LEAST MEDIUM SIGNIFICANCE RATING.

THE IMPACTS WERE ASSESSED FOR THE PREFERRED AND ALTERNATIVE AND FOR THE "NO - GO" OPTION, WITH AND WITHOUT THE IMPLEMENTATION OF PROPOSED MITIGATION MEASURES.

CUMULATIVE IMPACT: IN RELATION TO AN ACTIVITY, MEANS THE PAST, CURRENT AND REASONABLY FORESEEABLE FUTURE IMPACT OF AN ACTIVITY, CONSIDERED TOGETHER WITH THE IMPACT OF ACTIVITIES ASSOCIATED WITH THAT ACTIVITY THAT IN ITSELF MAY NOT BE SIGNIFICANT, BUT MAY BECOME SIGNIFICANT WHEN ADDED TO THE EXISTING AND REASONABLY FORESEEABLE IMPACTS EVENTUATING FROM SIMILAR OR DIVERSE ACTIVITIES.

(c) Please describe the gaps in knowledge.

No gaps in knowledge exist at this time, however, should any be identified, they will be communicated in an open and transparent manner and documented in the S24G application report.

(d) Please describe the underlying assumptions.

The assumptions are included with the uncertainties and limitations in (e).

(e) Please describe the uncertainties.

According to the Freshwater Ecologist limitations and uncertainties often exist within the various techniques adopted to assess the condition of ecosystems. The following limitations apply to the techniques and methodology utilised to undertake this study:

- Analysis of the freshwater ecosystems was undertaken at a rapid level and did not involve detailed habitat and biota assessments;
- The river health assessment was carried out using the South African Department of Water and Sanitation developed methodologies. River Health assessments were carried out to provide information on the ecological condition and ecological importance and sensitivity of the river systems impacted.
- The guideline document, "A Practical Field Procedure for the Identification and Delineation of Wetlands and Riparian Areas" document, as published by DWAF (2005) was followed for the delineation of the riparian and wetland areas.
- The ecological importance and sensitivity assessment were conducted according to the guidelines, as developed by DWAF (1999).
- The species mentioned in this report do not comprise a comprehensive list of all species which occur at the site. They are mentioned for descriptive purposes.

The level of aquatic assessment undertaken was considered to be adequate for this study.

According to the Botanist/Terrestrial Ecologist:

The property was visited on 8 November 2022, which is outside the optimal winter - spring flowering season in this largely winter rainfall region. Most, but not all perennial plant species were identifiable, but few of the seasonally evident bulbs and annuals were identifiable and evident. It is thus possible that certain plant Species of Conservation Concern may have been overlooked (i.e. were not evident) in the cleared areas, due to both the seasonal constraints and the recent clearing. However, the author

believes that sufficient information was available to make an accurate assessment of the vegetation in both the cleared and surrounding areas and its botanical and faunal significance, and the confidence level in the accuracy of the findings is high.
All plant species were noted in the field, and various digital photographs were taken (using a Motorola phone camera). The GIS based South African National Biodiversity Institute (SANBI) vegetation map for South Africa (Mucina & Rutherford 2006 and 2018 online update) was consulted, along with the National List of Threatened Ecosystems (DEA 2011, and Skowno et al 2019 update), and other relevant references noted in the text. Photographs of particular species observed on site, including most of the SCC, have been posted to the biodiversity website inaturalist.org. Conclusions were drawn based on this documentation and professional experience in the area and the region. Faunal observations were made whilst on site, but no trapping or photography was undertaken. Google Earth satellite imagery dated March 2022 (and earlier, notably July 2020 and March 2021) was used to verify vegetation patterns, cleared areas and the chronology, and for mapping purposes. Google Earth was used to measure areas. It is assumed that all mitigation recommendations made in the report will be included in any environmental authorisation, and that they will be adequately and timeously implemented.
According to the Hydrologist: In the absence of flow gauges in the stream feeding the dams a discharge calculation method had to be used that makes use of rainfall data. The two universal runoff computation methods generally used to compute runoff rates and volumes for small catchment areas using rainfall data are: a) the Rational Method and; b) the associated Modified Rational Method. Modified Rational Method uses the same input data and coefficients as the Rational Method along with the further assumption that, for the selected storm frequency, the duration of peak-producing rainfall is also the entire storm duration.

SECTION H: RECOMMENDATIONS OF THE EAP

In my view (EAP), the information contained in the Application and the documentation attached hereto is sufficient to make a decision in respect of the activity applied for.	**YES X**	NO

If "NO", list the aspects that should be further assessed through additional specialist input/assessment:		
If "YES", please indicate below whether in your opinion the applicant should be directed to cease the activity or if it should be authorised:		
Applicant should be directed to cease the activity:	YES	**NO X**
Please provide reasons for your opinion		
The two dams were already in place and existing – they were expanded on, and cleared and new dams were not built. The vegetation removed in the dam basins were infested with aliens. From a botanical perspective the sensitivity would have been moderate (having been the site of previous disturbance when the dams were constructed), and no plant Species of Conservation Concern (SoCC) are likely to have been impacted by dam clearing within the wetland areas. Indigenous plant diversity and cover is recovering well in the previously scraped areas next to the dams and is currently about 60% of the adjacent undisturbed areas and is expected to progress to 80% within the next two years. According to the Freshwater Specialist, the dams need not be removed but should be mitigated by implementing aquatic ecosystem-related mitigation and rehabilitation measures such as clearing invasive alien plants from the riparian zones and revegetating where necessary with suitable indigenous vegetation. The dams are small and do not impact significantly on the medium to high flows. There are also culverts in the dam wall that allow a constant release into the downstream watercourse during low flow conditions.		
The access road and single-track farm road to the dams is the shortest route (as permitted by the topography) and provides needed access for maintenance and management to the dams. The access road skirts a low sandstone ridge (with Potberg Sandstone Fynbos elements) and traverses an area that has been aggressively invaded by alien shrubs.		
The Fire break road also functions as a new servitude road for access to riverside landowners and to minimise security concerns and disturbance to game on site. According to the Botanist, the clearing of the vegetation in the road and firebreak areas appears to have been more comprehensive. There is thus negligible natural rehabilitation (current and expected) in the road area, and only minor rehabilitation in the firebreak area, although the latter is expected to largely recover over a period of 7-10yrs, if not further disturbed. This road has no impact on any watercourses.		
The two new cottages and utility/ parking building are for the landowner and his son to stay on the farm –they both work actively on the farm and spend extensive time at the site. The initial Freshwater Assessment found that the new cottages and the parking/utility building lie on the hill tops and more than 80m from the watercourses and are thus deemed to have had no impact on the aquatic features. A recent site visit by the EAP has confirmed that the most easterly cottage is within 32m of a drainage line. This was communicated to the specialist who then confirmed the 20m vegetation buffer is sufficient and the assessment would not change (refer Appendix H1).		
The proposed lodge will add to the income and economics of the area and provide supplementary income to the operations on site and thus improve sustainability. In addition, the lodge is located 225m away from the river and is located on disturbed and alien infested land with a low botanical significance.		
The commencement of the listed activities was in furtherance of an existing agricultural operation on site and materially linked to future agricultural and tourism operations on site. It would not make sense to cease and rehabilitate the affected areas.		
Overall freshwater, hydrological, botanical and faunal impacts of the clearing are within acceptable limits but mitigation measures proposed must be implemented.		
If you are of the opinion that the activity should be authorised, then please provide any conditions, including mitigation measures that should in your view be considered for inclusion in an authorisation.		
Mitigation proposed in the Botanical report: • All woody invasive alien vegetation (notably Acacia cyclops, A. mearnsii and A. saligna) within 100m of all footprints noted in this report (i.e. new houses, scraped areas around dams, new access road, eastern boundary fence) must be felled, using appropriate methodology (following best practise as outlined in Martens et al 2021). No heavy machinery may be used, and stems should be cut at close to ground level and immediately painted (not sprayed) with a suitable herbicide such as Garlon (but this not necessary for rooikrans). This must be completed within one year of the date of this report and should be audited by CapeNature. • A team trained in invasive alien invasive plant management (see Martens et al 2021) should be appointed to remove all woody alien invasive species on the on the applicant property (section of Rem of Ptn 1 south of Breede R and north of		

road to Cape Infanta) over the next three years, as well as all seedlings of invasive alien Acacia species, such that there is less than 1% overall woody alien vegetation cover on the property. The least densely invaded areas should be cleared first, as this is the most cost and ecologically effective strategy. This must be completed within three years of the date of this report and should be audited by CapeNature. If not adequately completed within three years, the DEA&DP or similar authority should be tasked with enforcing this.

- No spraying of herbicide should be allowed anywhere where there is any natural vegetation and should thus be restricted to designated cultivation areas.
- Any future clearing of firebreaks on the property must be done by brushcutting, to a height of no lower than 10cm. No soil disturbance should be allowed (hence no scraping by machinery), as this encourages alien plant invasion.
- All natural vegetation in moderate to good condition on the applicant property (between Breede River and Infanta Rd; about 200ha) should be signed up with CapeNature's Stewardship program within one year of any authorisation, with the applicant being responsible for all costs associated with this registration, and all Stewardship site management costs going forward.

Mitigation proposed by the Freshwater Ecological report:

- It is preferred that water be obtained from the surface water and out of the dams than drawing down the groundwater table through the abstraction of a borehole in the area. The contact springs on the property and surrounding areas are essential in supporting many groundwater-dependent ecosystems.
- The dams need not be removed but should be mitigated by implementing aquatic ecosystem related mitigation measures as outlined below.
- A programme should be put in place to remove the invasive alien trees along the riverbanks in this area. The main invasive alien vegetation currently occurring within the disturbed areas on the farm include Port Jackson willows (Acacia saligna), rooikrans (Acacia cyclops), black wattle (Acacia mearnsii), thistle (Cirsium vulgare) and wild tobacco (Nicotiana glauca).
- Indigenous vegetation observed along the watercourse that is suitable for revegetation of cleared riparian areas comprises Searsia lucida, Gymnosporia buxifolia, Osteospermum moniliferum, Morella serrata, Ficinia nodosa, Cyprus textilis and Isolepis prolifera.
- At least 25% of the flow in the watercourse that enters the dams should be allowed to continue downstream. This downstream flow requirement is important to maintain the downstream wetlands that provide habitat for amphibians and birdlife. The downstream flow requirement should largely be achieved passively by not drawing down the water level in the dam such that it drops below the lower culvert in the dam wall. The culverts should also be kept open and not blocked.
- Monitoring of the flow from the culverts in the lower dam wall should be recorded, as well as abstraction from the dam.
- It is recommended that there is an approved Maintenance Management Plan in place for the farm that would guide any maintenance activities undertaken in the watercourses.

Mitigation proposed in the Hydrological report:

- Monitoring the overflow of the dams should be done on a regular basis to ensure that a constant base flow is maintained;
- The flow should be recorded and a base flow of at least 10m^3 per day should be allowed through the overflow of the lower dam into the downstream section of this tributary;
- Surface water quality should be monitored to ensure that surface water contamination does not take place;
- The water monitoring plan should be revised on a regular basis to incorporate the changes in the water flow regime;
- Regular inspections should be undertaken of any access roads and stormwater management systems for signs of erosion and sedimentation;
- Regularly inspect all vehicles used in the catchment area for leaks to prevent ingress of hydrocarbons into topsoil;
- If any spills occur, they should be immediately cleaned up;
- Utmost care must be taken to ensure the runoff water does not pollute the watercourses.

Socio-economic mitigation measures:

- Information signage should be placed at the lodge educating visitors on the De Hoop Nature Reserve.
- Members of the nearby communities must be given priority for employment, where possible.
- Informal conservation of the remainder of the site is encouraged.

Additional mitigation measures resulting from the Public Participation Process:

- The Applicant/owner of the lodge must regularly service the conservancy tank proposed to deal with the sewage generated by the lodge.
- Close and rehabilitate any old and unused roads on site.
- No further indigenous vegetation clearance outside of approved footprints may be allowed.
- Water consumption from dams should be measured monthly and reported to BOCMA.
- Alien vegetation removal in terrestrial areas should be another focus point to improve overall ecological function.
- The EMPr must be implemented.
- A suitably qualified ECO must be appointed to oversee construction activities.
- The proposed MMP should be adopted and implemented on site – alien vegetation removal in dams and drainage lines is vital to conserve water within the system.
- The landowner should belong to the Greater Overberg Fire Protection Agency (GOFPA).

- All natural vegetation in moderate to good condition on the applicant property (between Breede River and Infanta Rd; about 200ha) should be signed up with CapeNature's Stewardship program within one year of any authorisation, with the applicant being responsible for all costs associated with this registration, and all Stewardship site management costs going forward.

SECTION I: REPRESENTATIONS – RESPONSE TO AN INCIDENT OR EMERGENCY SITUATION

This section is only applicable to instances where Section 49A (2) of NEMA applies. Please list all steps that where taken in response to the incident or emergency situation.
No emergency or incident situation applies to this site or project.

Please note:
Section 30 of NEMA deals with the procedures to be followed for the control of emergency incidents and Section 30A deals with procedures to the followed in the case of emergency situations.

SECTION J: PUBLIC PARTICIPATION

1. PUBLIC PARTICIPATION PROCESS TO BE FOLLOWED

1.1 THE PUBLIC PARTICIPATION PROCESS IN TERMS OF THE SECTION 24G FINE REGULATIONS, 2017

Regulation 8 of the Section 24G Fine Regulations require that all applicants must conduct public participation **prior to submission** of a section 24G application (as outlined in Annexure A of the Section 24G Fine Regulations - Section D: Preliminary Advertisement).

"The applicant must place a preliminary advertisement in-
(1) A local newspaper in circulation in the area in which the activity was, or activities were, commenced; and on the applicant's website, if any.
(2) This advertisement must comply with the requirements set out in Annexure A, Section D of the Section 24G Fine Regulations, 2017.
(3) The applicant must open and maintain of a register of interested and affected parties.
*(4) The **register must be attached to the application form and included in the report**, or form part of the information submitted in terms of section 24G(1) of the Act, which the register must, as a minimum, contain the names, contact details and addresses of-* *(a) all persons who, as a consequence of the public participation process conducted in respect of the application, have submitted written comments or attended meetings with the applicant or any environmental assessment practitioner or other specialist appointed by the applicant to assist with the application;* *(b) all persons who have requested the applicant, in writing, to place their names on the register; and* *(c) all organs of state that have jurisdiction in respect of the activity to which application relates."*

Please provide a summary of the steps followed where public participation was undertaken in accordance with Regulation 8 prior to submission of this Application Form. Ensure that proof of compliance with Regulation 8 is submitted with this Application Form, including, *inter alia*, proof of preliminary advertisement in a local newspaper.
A Pre-Application Public Participation Process was followed. The pre-application S24G Report was made available for a 30-day commenting period, from **18 January to 19 February 2024**, to the public, State Departments and Organs of State. An updated I&AP list is attached as **Appendix N1**. The intention was to notify potential I&APs, by - • Sending notification letters via email, to adjacent landowners, relevant Organs of State, the ward councillor, relevant State Departments and environmental organisations operating within the area (**Appendix N2**). • An advertisement was placed in the local newspaper, i.e. the Langeberg Bulletin, on *18 January 2024*. See **Appendix N3** for proof. • Two site notices were placed at access points to the site. **Appendix N4** contains a copy of the Site Notice, photographs of the Site Notices placed on site as well as a map indicating the location of the Site Notices. • The pre-application S24G Report was made available on PHS Consulting website (phsconsulting.co.za). The main report and appendices were made available as a separate links (**Appendix N5**). • I&APs were encouraged to submit any comments via email, post and WhatsApp. • All comments received during this commenting period have been responded to in the comments and response (C&R) report. Refer to **Table 1** for a summary of the comments and the project team's responses to the comments. Comments received are included as **Appendix N6** and the C&R Report is attached as **Appendix N7**.
Statutory Public Participation Process: The Draft S24G Report was made available for a 30-day commenting period, **from 31 May to 2 July 2024**, to all registered I&APs. Registered I&APs were notified via email of the availability of the report on the PHS Consulting website, for their comment (**Appendix N11**). Proof of notification is included as **Appendix N8**. Relevant Organs of State, the ward councillor and State Departments were notified and provided with either a hard copy of the report or a link to the online report. Refer to **Appendix N9**. All comments

received are included as **Appendix N10** and the comments are responded to in Table 2 of the Comments and Response Report (**Appendix N7**). The Draft S24G Report was updated to a Final S24G Report which included the above-mentioned PPP. This report was circulated for an additional 21 days, from **23 July to 14 August 2024**, to all registered I&APs. Proof of notification is included as **Appendix N12**. All comments received on the Final Report is attached as **Appendix N13**. Responses to these comments are summarised in Table 3 of the Comments and Response Report (**Appendix N7**).
Third Statutory Public Participation Process: The S24G Report will be made available for an additional 30-day commenting period, **from 12 September up to and inclusive of 14 October 2025**, to all registered I&APs. Registered I&APs were notified via email of the availability of the report on the PHS Consulting website, for their comment. Relevant Organs of State, the ward councillor and State Departments were notified and provided with either an electronic copy of the report (USB) or a link to the online report. All comments received will be responded to in Table 4 of the Comments and Response Report. After completion of this round of PPP the S24G Report will be updated to a Final S24G Report, including the above-mentioned PPP, before submission to DEA&DP.

Please indicate whether the applicant has a website (please tick relevant box):	YES	**NO X**
If yes, please note that the application information as specified above must have been advertised on such website and proof thereof must accompany this application. The application information will be placed on the EAP's website.		

Please note: Annexure A: Section D attached to this Application form must be strictly adhered to.

1.2 THE PUBLIC PARTICIPATION PROCESS IN TERMS OF NEMA EIA REGULATIONS, 2014

As the applicant, you may be directed to conduct the public participation process that fulfils the requirements outlined in Chapter 6 of the EIA Regulations, 2014. In doing so, you must take into account any applicable guidelines published in terms of Section 24J of NEMA, the Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations, 2014 as well as any other guidance provided by the Department. Note that the public participation requirements are applicable to all proposed sites.

Please highlight the appropriate box below to indicate the public participation process that has been or will be undertaken to give notice of the application to all potential interested and affected parties, including deviations that may be agreed to by the competent authority:

1. In terms of regulation 41 of the EIA Regulations, 2014 -			
(a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of -			
(i) the site where the activity to which the application relates is or is to be undertaken; and	**YES X**	DEVIATION	
(ii) any alternative site **N/A**	YES	DEVIATION	
(b) giving written notice, in any manner provided for in section 47D of the NEMA, to –			
(i) the occupiers of the site and, if the applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	**YES X**	DEVIATION	N/A
(ii) owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	**YES X**	DEVIATION	
(iii) the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;	**YES X**	DEVIATION	
(iv) the municipality (Local and District Municipality) which has jurisdiction in the area;	**YES X**	DEVIATION	
(v) any organ of state having jurisdiction in respect of any aspect of the activity; and	**YES X**	DEVIATION	
(vi) any other party as required by the Department;	YES	DEVIATION	**N/A X**
(c) placing an advertisement in -			
(i) one local newspaper; or	**YES X**	DEVIATION	
(ii) any official *Gazette* that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;	YES	DEVIATION	**N/A X**
(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken	YES	DEVIATION	**N/A X**
(e) using reasonable alternative methods, as agreed to by the Department, in those instances where a person is desirous of but unable to participate in the process due to— (i) illiteracy; (ii) disability; or (iii) any other disadvantage.	**YES X**	DEVIATION	N/A
If you have indicated that "DEVIATION" applies to any of the above, then Section 2. below must be completed.			
NOTE: 2. The NEM: WA requires that a notice must be placed in at least two newspapers. **N/A**			

If applicable, have/will an advertisement be placed in at least two newspapers?	YES	NO
If "NO", then an application for exemption from the requirement must be applied for.		

1. **Provide a list of all the state departments that has been / will be consulted:**		
List of State Depts:	**Comment obtained (YES/NO)**	**If not, provide reasons**
BOCMA	YES	
CapeNature	YES	
Western Cape Department of Transport	YES	
DEA&DP	NO	Comment was received after submission of the final S24G report.
HWC	YES	
Swellendam Local Municipality	NO	They were notified and requested to comment. No comment was received, however, they did respond to a comment submitted by another I&AP. This is included in Comments and Response Report.
Overberg District Municipality	YES	
Western Cape Government Department of Agriculture	YES	

2. **Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues raised were incorporated, or the reasons for not being incorporated or addressed. (The details of the outcomes of this process, including supporting information must be included in the Comments and Report to be attached to this application as Appendix G.)**
Refer to Tables 1, 2, 3 and 4in the Comments and Response Report (**Appendix N7**) summarising the comments received and the project team's responses to the comments.

3. **Provide a summary of any conditional aspects identified / highlighted by any Organs of State, which have jurisdiction in respect of any aspect of the relevant activity.**
No new recommendations were raised by Organs of State that require inclusion as a condition of approval.

Please note:

- **A list of all the potential interested and affected parties, including the organs of State must be opened, maintained and made available to any person requesting access, in writing, to the register.**
- **All comments of interested and affected parties on the Application Form and Additional Information must be recorded, responded to and included in the Comments and Responses Report attached as Appendix G to the Application. The Comments and Responses Report must also include a description of the Public Participation Process followed.**
- **The minutes of any meetings held by the EAP with interested and affected parties and other role players which record the views of the participants must also be submitted as part of the public participation information to be attached to the additional information/Environmental Impact Report as Appendix G.**
- **Proof of all the notices given as indicated, as well as of notice to the interested and affected parties of the availability of the Application Form/Additional Information must be submitted as part of the public participation information to be attached to the application as Appendix G.**

2. REPRESENTATIONS REGARDING DEVIATION FROM PUBLIC PARTICIPATION REQUIREMENTS IN TERMS OF THE EIA REGULATIONS, 2014

Please provide detailed reasons (representations) as to why it would be appropriate not direct you to comply with all of the requirements and to deviate from the requirements of regulation 41 as indicated above.
N/A

3. LIST OF STATE DEPARTMENTS

Section 24(O)(2) obliges the relevant authority to consult with every State department that administers a law relating to a matter affecting the environment when such authority considers an application for an environmental authorisation.

Provide a list of all the State departments that will be/have been consulted, including the name and contact details of the relevant official.

State Department	Name of person	Contact details
WESTERN CAPE GOVERNMENT DEPARTMENT OF AGRICULTURE	Mr Cor van der Walt	Tel: 021 808 5099
		Fax: 021 808 5092
		E-mail: CorvdW@elsenburg.com
HWC	Ms W Dhansay	Tel: 021 483 9595
		Fax: 021 483 9543/9598/9692
		E-mail: Waseefa.dhansay@westerncape.gov.za
WESTERN CAPE DEPARTMENT OF TRANSPORT	Mr. Devlin Fortuin	Tel: 021 483 4669
		Fax: n/a
		E-mail: devlin.fortuin@westerncape.gov.za / vanessa.stoffels@westerncape.gov.za
CAPENATURE	Mr R Smart	Tel: 087 087 8017 / 072 835 8741
		Fax: 086 529 4900
		E-mail: rsmart@capenature.co.za
BOCMA	Ms Elkerine Rossouw	Tel: 023 346 8000
		Fax: 023 347 2012
		E-mail: erossouw@bgcma.co.za
OVERBERG DISTRICT MUNICIPALITY	Ms R Volschenk	Tel: 028 425 1157
		Fax: 028 425 1014
		E-mail: rvolschenk@odm.org.za
SWELLENDAM LOCAL MUNICIPALITY	Mr R Brunings	Tel: 028 514 8539
		Fax: 028 514 2694
		E-mail: rbrunings@swellendam.gov.za

Please note:
A State department consulted in terms of Section 24O (2) of NEMA and Regulations 3(4) and 43(2) must within 30 days from the date of the Department/EAP's request for comment, submit such comment in writing to the Department. The applicant/EAP is therefore required to inform this Department in writing when the application/relevant information is submitted to the relevant State Departments. Upon receipt of this confirmation, this Department will in accordance with Section 24O (2) & (3) of the NEMA inform the relevant State Departments of the commencement date of the 30-day commenting period.

PART 2 – ANNEXURE A TO THE SECTION 24G APPLICATION FORM

SECTION A: DIRECTIVES

Section 24G(1) of NEMA provides that on application by a person who has commenced with a listed or specified activity without an environmental authorisation in contravention of section 24F(1); or a person who has commenced, undertaken or conducted a waste management activity without a waste management licence in terms of section 20(b) of the National Environment Management: Waste Act, 2008 (Act 59 of 2008) ("NEM:WA") the Minister, the Minister responsible for mineral resources or the MEC concerned (or the official to which this power has been delegated), as the case may be, may direct the applicant to-

i	*immediately cease the activity pending a decision on the application submitted in terms of this subsection*	
ii	*investigate, evaluate and assess the impact of the activity on the environment*	
iii	*remedy any adverse effects of the activity on the environment*	
iv	*cease, modify or control any act, activity, process or omission causing pollution or environmental degradation*	
v	*contain or prevent the movement of pollution or degradation of the environment*	
vi	*eliminate any source of pollution or degradation*	
vii	*compile a report containing-*	
	aa	*a description of the need and desirability of the activity*
	bb	*an assessment of the nature, extent, duration and significance of the consequences for or impacts on the environment of the activity, including the cumulative effects and the manner in which the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity*
	cc	*a description of mitigation measures undertaken or to be undertaken in respect of the consequences for or impacts on the environment of the activity*
	dd	*a description of the public participation process followed during the course of compiling the report, including all comments received from interested and affected parties and an indication of how the issues raised have been addressed*
	ee	*an environmental management programme*
viii	*provide such other information or undertake such further studies as the Minister, Minister responsible for mineral resources or MEC, as the case may be, may deem necessary.*	

You are hereby provided with an opportunity to make representations on any or all of the abovementioned instructions including where you are of the opinion that any of these instructions are not relevant for the purposes of your application setting out the reasons for your assertion. Kindly note further that after taking your representation into account a final directive may be issued.

Please Note:
Notwithstanding the above, subsequent to submission of the application form to the Department, you may be issued with a specific directive in terms of section 24G(1)(i) to (viii), and you will therefore be provided with an opportunity to make further representations as to the specific directive.

The appointed Environmental Assessment Practitioner, on behalf of the applicant, may be directed to compile and submit a report that meets the requirements of section 24G(vii)(aa)-(ee) as specified above.

SECTION B: DEFERRAL OF THE APPLICATION

Section 24G(7) of the NEMA provides that if at any stage after the submission of an application it comes to the attention of the Minister, the Minister responsible for mineral resources or the MEC, that the applicant is under criminal investigation for the contravention of, or failure to comply with, section 24F(1) of the NEMA or section 20(b) of the NEM:WA, the Minister, Minister responsible for mineral resources or MEC may defer a decision to issue an environmental authorisation until such time as the investigation is concluded and-

(a) the National Prosecuting Authority has decided not to institute prosecution in respect of such contravention or failure;
(b) the applicant concerned is acquitted or found not guilty after prosecution in respect of which such contravention or failure has been instituted; or
(c) the applicant concerned has been convicted by a court of law of an offence in respect of such contravention or failure and the applicant has in respect of the conviction exhausted all the recognised legal proceedings pertaining to appeal or review.

Kindly answer the following questions:

Are you, the applicant, being investigated for a contravention of section 24F(1) of the NEMA in respect of a matter that is not subject to this application and in any province in the Republic?	*YES*	***NO X***	*UNCERTAIN*
If yes provide details of the offence being investigated and authority conducting the investigation. *If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.*			
Are you, the applicant, being investigated for the contravention of section 20(b) of the NEMWA in respect of a matter that is not subject to this application and in any province in the Republic?	*YES*	***NO X***	*UNCERTAIN*
If yes provide details of the offence being investigated and authority conducting the investigation. *If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.*			
Are you, the applicant, being investigated for an offence in terms of section 24F(1) of the NEMA or section 20(b) of the NEMWA in terms of which this application directly relates?	*YES*	***NO X***	*UNCERTAIN*
If yes provide details of the offence being investigated and authority conducting the investigation. *If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.*			

If you have answered yes or uncertain to any of the above questions, you are hereby provided with an opportunity to make representations as to why the Minister, Minister responsible for mineral resources or MEC, as the case may be, should not defer the application as he or she is entitled to do under section 24G(7).

SECTION C: QUANTUM OF THE SECTION 24G FINE

In terms of section 24G(4) of the NEMA, it is mandatory for an applicant to pay an administrative fine as determined by the competent authority before the Minister, Minister responsible for mineral resource or MEC may take a decision on whether or not to grant an *ex post facto* environmental authorization or a waste management license as the case may be. The quantum of this fine may not exceed R5 million.

Having regard to the factors listed below, you are hereby afforded with an opportunity to make representations in respect of the quantum of the fine and as to why the competent authority should not issue a maximum fine of R5 million.

Please note that Part 1 of this section must be completed by an independent environmental assessment practitioner after conducting the necessary specialist studies, copies of which must be submitted with this completed application form.

Please also include in your representations whether or not the activities applied for in this application (if more than 1) are in your view interrelated and provide reasons therefor.

PART 1: THE IMPACTS OR POTENTIAL IMPACTS OF THE ACTIVITY/ACTIVITIES

Index	**Socio Economic Impact** **Description of variable**	**Place an "x" in the appropriate box**
	The activity is not giving, has not given and will not give rise to any negative socio-economic impacts	**X**
	The activity is giving, has given, or could give rise to negative socio-economic impacts, but highly localised	
	The activity is giving, has given, or could give rise to significant negative socio-economic and regionalized impacts	
	The activity is resulting, has resulted or could result in wide-scale negative socio-economic impacts.	
	Motivation: The activity would rather result in positive socio-economic impacts in the form of temporary and permanent job creation, secure year-round employment in an area with seasonal tourism and agriculture employment opportunities. Total permanent jobs created will be between 40 and 50. The labour will mostly be sourced from the local community, failing which the next source will be Swellendam. The lodge and seasonal hunting activities will also complement the tourism sector in the area and stimulate additional services and trade (e.g. shops, wineries and restaurants). The lodge will attract more visitors to the area during the winter months (hunting season) when the tourist numbers are typically lower. The guests at the proposed lodge are likely to visit the De Hoop Nature Reserve, resulting in an increase in day visitors to the Nature Reserve. Furthermore, visitors may prefer to return to the Nature Reserve in the future. Since a different experience will be offered at the proposed lodge, it is unlikely to be competition to the nearby Nature Reserve. While the lodge is in close proximity to the Protected Area and World Heritage Site, it will not have any negative impacts on the conservation of the Nature Reserve. The proposed lodge is small and will not be nuisance to the Protected Area in terms of noise and light pollution. It is separated from the Protected Area by the Infanta Road and farming land. Guests can therefore not access the Protected Area. Furthermore, services of the lodge will not impact the Protected Area. The site will be managed as per the Game Management Plan. The informal conservation on the remaining area on the site will be encouraged thereby complying with the National Protected Area Expansion Strategy. The lodge will only consist of 10 rooms, therefore a maximum of 10 additional cars is likely to make use of road at one given period. This additional impact on the road will be insignificant.	

Index	**Biodiversity Impact** **Description of variable**	**Place an "x" in the appropriate box**
	The activity is not giving, has not given and will not give rise to any impacts on biodiversity	
	The activity is giving, has given or could give rise to localised biodiversity impacts	**X**
	The activity is giving, has given or could give rise to significant biodiversity impacts	

The activity is, has or is likely to permanently / irreversibly transform/ destroy a recognised biodiversity 'hot-spot' or threaten the existence of a species or sub-species.	

Motivation:

The aquatic ecosystem assessment determined the river to be moderately modified and of moderate ecological importance and sensitivity with a target ecological condition of largely natural to moderately modified. This is largely due to the disturbance and loss of riparian vegetation along the watercourse and its replacement with alien vegetation. Removal of alien vegetation removal along the riverbanks is being undertaken and can be expected to improve the ecological integrity of the river over the long term.

Past imagery for the farm indicates that the tributary at the dam sites has long been disturbed. The recent works have taken place within these already disturbed areas and thus have not resulted in any further degradation of the river system.

The dams appear to have been constructed within the watercourse prior to 1940 but were not maintained for a long period until 2019/2020.
The dams have also not resulted in any significant impact on the flow in the associated watercourse. The catchment of the dam is less than 0.95 km^2 and generates a runoff of approximately 120 000 m^3. The dams have a combined storage of approximately 4130m^3 and thus do not impact significantly on the medium to high flows. There is also an approx. 300 – 400 mm outlet pipe in the dam wall that allows a constant release into the downstream watercourse during low flow conditions, with a second one at a slightly higher level that allows for further downstream flow releases in higher flow conditions.

The initial Freshwater Assessment found that the new cottages and the parking/utility building lie on the hill tops and more than 80m from the watercourses and are thus deemed to have had no impact on the aquatic features. A recent site visit by the EAP has confirmed that the most easterly cottage is within 32m of a drainage line. This was communicated to the specialist who then confirmed the 20m vegetation buffer is sufficient and the assessment would not change (refer Appendix H1).

Judging by the available satellite imagery from August 2019, prior to dam excavation and clearing, the vegetation in the sediment-filled dam footprints was dense (100% cover) and composed of 30-50% canopy cover of alien invasive species such as rooikrans (Acacia cyclops), black wattle (Acacia mearnsii) and Port Jackson (Acacia saligna). Open water was significantly less than it is now. Indigenous species likely included those still present above and below the dams. From a botanical perspective the sensitivity would have been moderate (having been the site of previous disturbance when the dams were constructed), and no plant Species of Conservation Concern (SoCC) are likely to have been impacted by dam clearing within the wetland areas. The vegetation in the dam footprints now includes the above species, and drowned specimens of the alien trees noted above. The wetland fringing vegetation is representative of this habitat throughout the region.

The adjacent areas where soil was harvested for the enlarged dam walls cover about 0.65ha in total (including dam walls), and these were in areas that had not been previously cultivated, and they thus probably supported largely natural vegetation. The vegetation type in these shale areas is much closer to Eastern Ruens Shale Renosterveld (an Endangered unit) than the mapped Potberg Ferricrete Fynbos. Indigenous plant diversity and cover is recovering well in the previously scraped areas next to the dams and is currently about 60% of the adjacent undisturbed areas and is expected to progress to 80% within the next two years. The Botantist states in the Botanical Impact Assessment that fortunately most of the vegetation disturbance and clearing did not significantly damage the upper soil surface, and consequently natural (passive) vegetation rehabilitation is expected to be good and will take place over a period of up to ten years.

The access road skirts a low sandstone ridge (with Potberg Sandstone Fynbos elements) and traverses an area that has been aggressively invaded by alien shrubs such as rooikrans (*Acacia cyclops*) and Port Jackson (*Acacia saligna*). The road is an average of 4-5m wide, and indigenous vegetation grows right up to the edge of the road, as does a lot of alien vegetation.

In the case of the owner's cottages area the construction phase botanical and faunal impacts are likely to have been Low to Medium negative, given that the site was largely natural vegetation prior to 2021, and most of it was a mapped CBA1 with natural vegetation.

No significant faunal impacts are likely to have arisen because of the vegetation clearing next to the dams or in the road footprints, largely because the noise associated with such would have caused most of the fauna to vacate the area and move to suitable nearby habitat, which is still available. The clearing out of the dams would have temporarily disturbed the fauna in these areas, but appears to have recovered fully and quickly, as would be expected.

Index	Sense of Place Impact and / or Heritage Impact Description of variable	Place an "x" in the appropriate box
	The activity is in keeping with the surrounding environment and / or does not negatively impact on the affected area's sense of place and /or heritage	**X**
	The activity is not in keeping with the surrounding environment and will have a localised impact on the affected area's sense of place and/or heritage	
	The activity is not in keeping with the surrounding environment and will have a significant impact on the affected area's sense of place and/ or heritage	
	The activity is completely out of keeping with the surrounding environment and will have a significant impact on the affected area's sense of place and/ or heritage	
	Motivation: A NID and Screener was submitted to HWC for the project and the response from HWC confirmed that there is no reason to believe that the Rectification application for unlawful development on RE of Portion 1 of Farm 492 Melk Hout Rivier, impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required.	

Index	Pollution Impact Description of variable	Place an "x" in the appropriate box
	The activity is not giving, has not given and will not give rise to any pollution	**X**
	The activity is giving, has given or could give rise to pollution with low impacts.	
	The activity is giving, has given or could give rise to pollution with moderate impacts.	
	The activity is giving, has given or could give rise to pollution with high impacts.	
	The activity is giving, has given or could give rise to pollution with major impacts.	
	Motivation: The activity for the dam clearance and expansion did not give rise to pollution of downstream areas. The new access road, single track farm roads adjacent to the dams and firebreak road construction did not give rise to pollution. The construction of the two cottages and parking/ utility building did not give rise to pollution. The vegetation removed during these activities was used elsewhere on the farm as composting. The proposed construction and operation of the lodge will not give rise to pollution if the management and mitigation from the EMPr is in place and implemented correctly.	

PART 2: COMPLIANCE HISTORY AND KNOWLEDGE OF THE APPLICANT

Index	Previous administrative action (i.e. administrative enforcement notices) issued to the applicant in respect of a contravention of section 24F(1) of the National Environmental Management Act and/or section 20(b) of the National Environmental Management Waste Act Description of variable	Place an "x" in the appropriate box
	Administrative action was previously taken against the applicant in respect of the abovementioned provisions.	
	No previous administrative action was taken against the applicant, but previous administrative action was taken against a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time when the administrative action was taken.	
	Administrative action was <u>not</u> previously taken against the applicant in respect of the abovementioned provisions.	**X**
	Explanation of all previous administrative action taken in respect of the above: N/A	

Index	Previous Convictions in terms of section 24F(1) of the National Environmental Management Act and/or section 20(b) of the National Environmental Management Waste Act Description of variable	Place an "x" in the appropriate box

The applicant was previously convicted in terms of either or both of the abovementioned provisions.	
No previous convictions have been secured against the applicant but a conviction has been secured against a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time; or a conviction was secured against a director of the applicant in his or her personal capacity.	
The applicant has <u>not</u> previously been convicted in terms of either or both of the above mentioned provisions.	**X**
Explanation of all previous convictions in respect of the above: N/A	

Index	**Number of section 24G applications previously submitted by the applicant - NONE** **Description of variable**	**Place an "x" in the appropriate box**
	Previous applications in terms of section 24G of NEMA were submitted by the applicant.	N/A
	No previous applications have been submitted by the applicant but a previous application(s) have been submitted by a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time.	
	No previous applications have been submitted by the applicant but the applicant sat on the board of a firm that previously submitted an application.	
	Explanation in respect of all previous applications submitted in terms of section 24G: N/A	

PART 3: APPLICANT'S PERSONAL CIRCUMSTANCES

Index	**Applicant's legal persona** **Description of variable**	**Place an "x" in the appropriate box**
	The applicant is a natural person.	
	The applicant is a firm.	**X**
	Describe the firm: The company was established in 2021 and has one director. The company was established to enable the establishment and development of the proposed site.	

Index	**Any other relevant information that the applicant would like to be considered.**
	Motivate and explain fully: The applicant would appreciate if DEA&DP can consider the economic climate of the last few years, where investment and expansion has not always been easy, and the potential amount of jobs this facility creates in the local economy. The applicant has shown through the alien removal work and placement of the lodge that it is conservation minded and aims to comply with legislation when aware of it. The close working relationship with CapeNature on the development, authorisation and implementation of the Game Management Plan highlights the Applicant's commitment to legal compliance. The Applicant supports the recommendation by the Botanist that all natural vegetation in moderate to good condition on the applicant property (between Breede River and Infanta Rd; about 200ha) should be signed up with CapeNature's Stewardship program.

NOTE: An explanation as to why the applicant did not obtain an environmental authorisation and/or waste management licence must be attached to this application.

<u>Explanation as to why the applicant did not obtain an EA:</u>

The applicant is in the process of buying a section of the farm (north of the Infanta-Malgas Road) from Mr Kemp, the landowner. The farm was previously dryland wheat cultivation, which was a seasonal form of agriculture practiced mostly on the northern part of the farm. The applicant aims to bring in game, create a lodge (for hunting and general tourism) on site.

The applicant was not aware of the NEMA listed activities when contravening them and ceased any further work on site when made aware of it. The applicant made resources and funding available to lodge the S24G process and complete four specialist studies, which indicates commitment to rectify the situation on site.

The two cottages were built to provide accommodation for the applicant and his son as they spend significant amounts of time working on the site. The previous accommodation was in a tent, which is not favorable during various weather conditions.

The dams were cleared out and expanded in order to provide drinking water to the people and animals on site. There is no alternative drinking water source on site. It will also be the source of irrigation water for the site.

The access road to the dams followed the edge of previous agricultural fields and provided the shortest route (with the least vegetation removal). The layout was restricted by local geology in places.

The extension to the firebreak road was as a servitude road to provide access to landowners adjacent to the river that historically would have driven over the farm to gain access. The servitude road minimizes disturbance to animals on site and improves security. The eastern perimeter road was cleared by a previous owner and not the Applicant.

The lodge is materially linked to all the previously listed activities and should therefore be included in the S24G process rather than a separate EA. Without the game farming activities, and the possibility of tourism hunting it brings, the lodge would not be viable. The lodge also allows visitors to stay on site, decreasing distances travelled to and from the farm.

SECTION D: PRELIMINARY ADVERTISEMENT

When submitting this application form, the applicant must attach proof that the application has been advertised in at least one local newspaper in circulation in the area in which the activity was commenced, and on the applicant's website, if any.

The advertisement must state that the applicant commenced a listed or specified activity or activities or waste management activity or activities without the necessary environmental authorisation and/or waste management licence and is now applying for *ex post facto* approval. It must include the following:

- the date;
- the location;
- the applicable legislative provision contravened; and
- the activity or activities commenced with without the required authorisation.

Interested and affected parties must be provided with the details of where they can register as an interested and affected party and / or submit their comment. At least 20 days must be provided in which to do so.

This advertisement shall be considered as a preliminary notification and the competent authority may direct the applicant to undertake further public participation and advertising after receipt of this application form.

NOTE: Unless protected by law, all information contained in and attached to this application form may become public information on receipt by the competent authority. This application must be attached to any documentation or information submitted by an applicant further to section 24G(1).

PART 3 -

APPENDICES

The following appendices must, where applicable, be attached to this form:

Appendix		Tick the box if Appendix is attached
Appendix A:	**Locality map**	√
Appendix B:	**Site plan(s)**	√
Appendix C:	**Building plans (if applicable)**	**n/a**
Appendix D:	**Colour photographs**	√
Appendix E:	**Biodiversity overlay map**	√
Appendix F:	**Permit(s) / license(s) from any other organ of state including service letters from the municipality**	**n/a**
Appendix G:	**Appendix G: Landowners Consent**	To be included in final submission
Appendix H:	**Specialist Report(s):** **H1 – Freshwater Ecological Report** **H2 – Hydrological Report** **H3 – Botanical Impact Assessment Report** **H4 – Motivational Report for Lodge**	√
Appendix I:	**I1 - Environmental Management Programme** **I2 - Maintenance Management Plan**	√
Appendix J:	**Supporting documents relating to compliance/enforcement history of the applicant, including but not limited to, Pre-compliance/compliance notices, Pre-directives/directives etc.**	√
Appendix K:	**Certified copy of Identity Document of Applicant**	To be included in final submission
Appendix L:	**Certified copy of the title deed**	To be included in final submission
Appendix M:	**M1 - WARMS** **M2 - DEFF Screening report and SSV** **M3 - NID and Screener to HWC and comment**	√
Appendix N:	**N7: Comments and Response Report**	√
Appendix O:	**Game Management Plan**	√

Where an application has been made in terms of the waste management activities, please complete and annex Annexure 1 as in the following: **N/A**

Annexures for waste listed activity/ies supporting information		Tick the box if Annexure is attached
Annexure 1	**Waste listed activities supporting information (as in prescribed attached form)**	**n/a**
Other	(please list accordingly)	

DECLARATIONS

THE APPLICANT

Note: Duplicate this section where there is more than one applicant

- I Jared Jakobus Booysen, in my personal capacity or duly authorised as CEO (state capacity) by Melkhoutriver Properties (Pty) Ltd thereto hereby declare/affirm that all the information contained in this application to be true and correct, and that I:

- am fully aware of my responsibilities in terms of t the National Environmental Management Act of 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations") in terms of NEMA, the National Environmental Management: Waste Act, 2008 (Act 59 of 2008) ("NEM:WA") and all relevant specific environmental management Act(s), and that failure to comply with these requirements may constitute an offence in terms of the environmental legislation;
- appointed the environmental assessment practitioner as indicated above, which meet all the requirements in terms of Regulation 13 of the EIA Regulations to act as the independent Environmental Assessment Practitioner for this application;
- have provided the environmental assessment practitioner and the competent authority with access to all information at my disposal that is relevant to the application;
- am aware that I may be issued with a directive and that I must comply with such a directive;
- am fully aware of the administrative fine to be paid before a decision, with respect to the continuation of the listed activity(ies), will be made;
- will be responsible for the costs incurred in complying with the environmental legislation including but not limited to –
    - costs incurred in connection with the appointment of the environmental assessment practitioner or any specialist appointed in terms of Regulation 13 of the EIA Regulations);
    - costs incurred in respect of the undertaking of any process required in terms of this application;
    - costs in respect of any prescribed fee payable in respect of this application;
    - costs in respect of specialist reviews, if the competent authority decides to recover costs;
    - the provision of security to ensure compliance with the applicable management and mitigation measures; and
    - fine costs
- am responsible for complying with the conditions that might be attached to any decision(s) issued by the competent authority;
- have the ability to implement the applicable management, mitigation and monitoring measures; and
- hereby indemnify, the government of the Republic of South Africa, the competent authority and all its officers, agents and employees, from any liability arising out of, inter alia, the content of any report, any procedure or any action for which the applicant or environmental assessment practitioner is responsible.

am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (

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

Signature of the applicant:

Jared Jakobus Booysen

Name:

Melkhoutriver Properties (Pty) Ltd

Name of Firm (if applicable):

08.09.2025

Date:

THE INDEPENDENT ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I Amanda Fritz-Whyte, as the appointed independent environmental practitioner ("EAP") hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that I:

- act/ed as the independent EAP in this application;
- regard the information contained in this application to be true and correct, and
- do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the National Environmental Management Act of 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations") in terms of NEMA, the National Environmental Management: Waste Act, 2008 (Act 59 of 2008) ("NEM:WA") and the relevant specific environmental management Act(s);
- have and will not have any vested interest in the proposed activity proceeding;
- have disclosed, to the applicant and competent authority, any material information that have or may have the potential to influence the decision of the competent authority or the objectivity of any report, plan or document required in terms of the NEMA, the EIA Regulations, the NEM:WA and any specific environmental management Act(s);
- am able to meet the responsibilities in terms of NEMA, the EIA Regulations (specifically in terms of Regulation 13 of the EIA Regulations, 2014) and any specific environmental management Act, and am fully aware that failure to comply with these requirements may constitute and result in disqualification;
- have ensured that information containing all relevant facts in respect of the application was distributed or made available to interested and affected parties and the public and that participation by interested and affected parties was facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- have ensured that the comments of all interested and affected parties were considered, recorded and submitted to the competent authority in respect of the application;
- have kept a register of all interested and affected parties that participated in the public participation process; and
- have provided the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not.
- am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations

Note: The terms of reference must be attached.

Amanda Fritz-Whyte

Signature of the environmental assessment practitioner:

PHS Consulting

Name of company:

8 September 2025

Date:

PART 4 – NOT APPLICABLE

ANNEXURE B - SUPPORTING INFORMATION WHERE THE ACTIVITY BEING APPLIED FOR IS A LISTED WASTE MANAGEMENT ACTIVITY/IES (IF RELEVANT)

1. WASTE QUANTITIES

Indicate or specify types of waste and list the estimated quantities (expected to be) managed daily (should you need more columns; you are advised to add more)

Note: In this case of hazardous waste, the National Department of Environmental Affairs is the relevant competent authority to consider the 24G application.

Non-hazardous waste	Total waste handled (tonnes per day)

Source of information supplied in the table above Mark with an "X"

Determined from volumes	
Determined with weighbridge/scale	
Estimated	

1.1. Recovery, Reuse, Recycling, treatment and disposal quantities:

Indicate the applicable waste types and quantities expected to be disposed of and salvaged annually:

TYPES OF WASTE	MAIN SOURCE (NAME OF COMPANY)	QUANTITIES		ON-SITE RECOVERY REUSE RECYCLING TREATMENT OR DISPOSAL	OFFSITE RECOVERY REUSE RECYCLING TREATMENT OR DISPOSAL	OFFSITE DISPOSAL
		Tons/ Month	M^3/ Month	Method & Location	Method & Location and Contractor details	

2. GENERAL

Prevailing wind direction (e.g. NWW)

November – April	
May - October	

The size of population to be served by the facility:

	Mark with "X"	Comment
0-499		
500-9,999		
10,000-199,999		
200,000 upwards		

LANDFILL PARAMETERS (If applicable)

The method of disposal of waste:

Land-building ☐ Land-filling ☐ Both ☐

The dimensions of the disposal site in metres

	At commencement	After rehabilitation

The total volume for the disposal of waste on the site:

Volume Available	Mark with "X"	Source of information (Determined by surveyor/ Estimated)
Up to 99		
100-34 999		
35 000- 3,5 million		
>3,5 million		

The total volume already used for waste disposal on the site:

(a) Will the waste body be covered daily	Yes	No
(b) Is sufficient cover material available	Yes	No
(c) Will waste be compacted daily	No	No

If the answers (a) and/or (b) are No, what measures will be employed to prevent the problems of burning or smouldering of waste and the generation of nuisance?

The Salvage method

Mark with an "X" the method to be used.

At source	
Recycling installation	
Formal salvaging	
Contractor	
No salvaging planned	

Fatal flaws for the site:
Indicate which of the following apply to the facility for a waste management activity:

Within a 3000m radius of the end of an airport landing strip	Yes	No
Within the 1 in 50-year flood line of any watercourse	Yes	No
Within an unstable area (fault zone, seismic zone, dolomitic area, sinkholes)	Yes	No
Within the drainage area or within 5 km of water source	Yes	No
Within the drainage area or within 5 km of water source	Yes	No
Within an area adjacent to or above an aquifer	Yes	No
Within an area with shallow bedrock and limited available cover material	Yes	No
Within 100 m of the source of surface water	Yes	No
Within 1km from the wetland	Yes	No

Indicate the distance to the boundary of the nearest residential area	metres
Indicate the distance to the boundary of the industrial area	metres

Wettest six months of the year

November- April	
May -October	

For the wettest six-month period indicated above, indicate the following for the preceding 30 years

	Total rainfall for 6 months	**Total rainfall for 6 months**	**Total rainfall for 6 months**
For the 1st wettest year			
For the 2nd wettest year			
For the 3rd wettest year			
For the 4th wettest year			
For the 5th wettest year			
For the 6th wettest year			
For the 7th wettest year			

For the 8th wettest year			
For the 9th wettest year			
For the 10th wettest year			

Location and depth of ground water monitoring boreholes:

Codes of the boreholes	Borehole locality	Depth (m)	Latitude	Longitude
			° ' "	° ' "

Location and depth of landfill gas monitoring test pit:

Codes of the boreholes	Borehole locality	Latitude	Longitude
		° ' "	° ' "
		° ' "	° ' "