VISUAL IMPACT ASSESSMENT

REDEVELOPMENT OF AN EXISTING RESIDENTIAL HOUSE AND NEW OUTBUILDINGS ON PORTION 134 OF THE FARM 599; ROOIELS

By

PHS Consulting

OCTOBER 2023

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1. PROJECT DESCRIPTION

1.1. Background & Description of Proposed Activity

The proposal entails the redevelopment of the main house incl. ancillary buildings and the development of a new outbuilding and associated infrastructure on Portion 134 of Farm 559, a small (24.02 ha) farm located in Rooiels, on the eastern side of False Bay in the Western Cape. The property extends across both sides of the R44 between Rooiels and Betty's Bay. The property is accessed off the R44 via a minor existing road, which splits to lead to a neighbouring property to the south (Portion 46 of Farm 559), and northwards, to the proposed development area (Refer farm outline in red in Figure 1). Between February and March 2017, a fire occurred in the region. As a result, the original house located on the site burnt down and the site was abandoned. The new owner wishes to redevelop the residential building site with the addition of outbuildings on the site.

Figure 1: Location – Application Farm in Red, SE of Rooiels.

The proposal is subjected to the National Environmental Management Act of 1998 (NEMA) Regulations therefore, a Basic Assessment process is currently underway to obtain an Environmental Authorisation from the Department of Environmental Affairs and Development Planning (DEA&DP) for the following:

- Construction of main residential house and ancillary buildings (node 1) on top of the old house footprint that equates to a total development footprint of approx. 1155m²
- Construction of an outbuilding garage (node 2) to accommodate the owners motor vehicle collection and farm equipment that equated to a total development footprint of approx. 375m²
- Services to both these sites exist in the form of access, power and water, new conservancy tanks will be installed on previously disturbed footprints.

The application is subject to the NEMA Regulation because the proposal triggers the removal of more than 300 sqm of indigenous vegetation and the site footprints are located within 32 m from freshwater resources. NEMA processes require that an ecological (fauna & flora) and an aquatic specialist assessment take place to determine areas where development is acceptable from a bio-physical point of view. The figure below depicts the two nodes where development is proposed. Approximately 890 m² of indigenous vegetation will be removed in total resulting in a **low-medium negative botanical impact**, as determined by the appointed botanical specialist. The overall **cumulative ecological impacts at the regional scale were found very-low negative** for the proposed development, as the footprint is very small, and the vegetation unit is well conserved. The **aquatic** specialist determined that the impacts associated with the preferred nodes can be suitably mitigated to **low levels of significance**. Therefore, implementation of development inside these two nodes are acceptable from an aquatic biodiversity perspective.

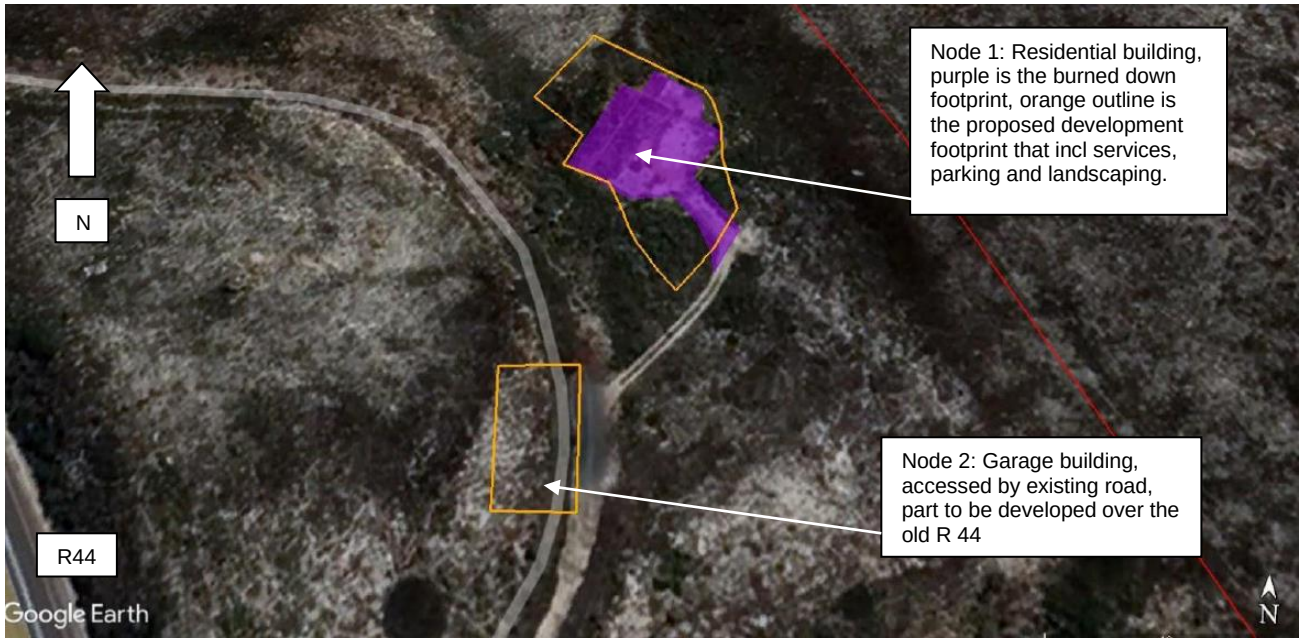

Figure 2: Proposed development nodes 1 & 2 (the site) outlined in orange (direct result of environmental specialist input into the NEMA process.)

Slide 1: The original development footprint (node 1).

Slide 2: The location of node 2, halfway on the old R 44 road towards the left. The existing Eskom pole (marked in white) is approx. 11 m high, the visibility of this pole from various vantage points will be relevant throughout this report, with specific reference under the photo section below. Note that the pole consists of a transformer box approx. 2 meters below the top and ceramic anchors on the top.

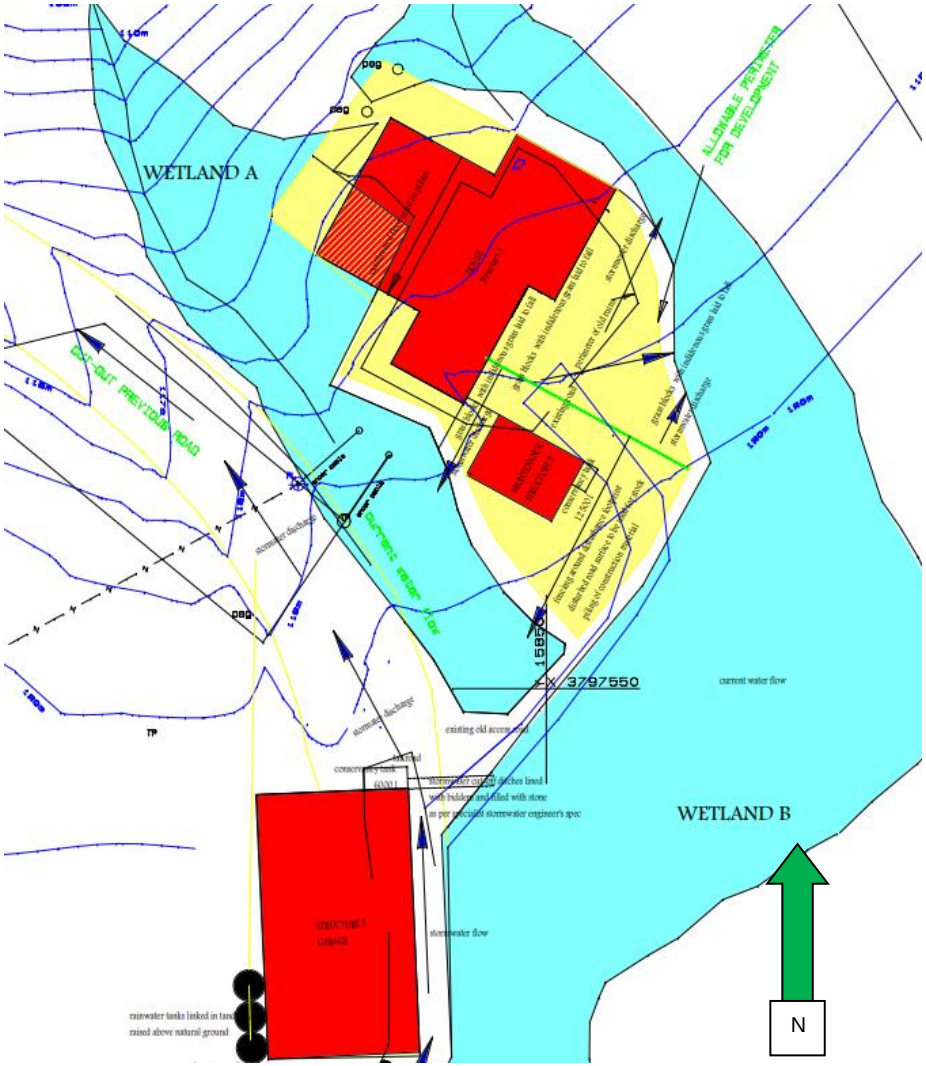

Figure 3: The 2023 proposed development infrastructure in red, located inside the ecologically determined node 1 and 2.

The applicant is applying for environmental authorisation ito NEMA in order to develop the two footprints. Detailed building plans will be drafted for the Town Planning and Building plan approval process. The Site Development Plan that forms part of the NEMA process depicts the buildings on the nodes as follow. A maximum height of 8 meters will apply.

Node 1: Residential House – Elevations relevant to this report

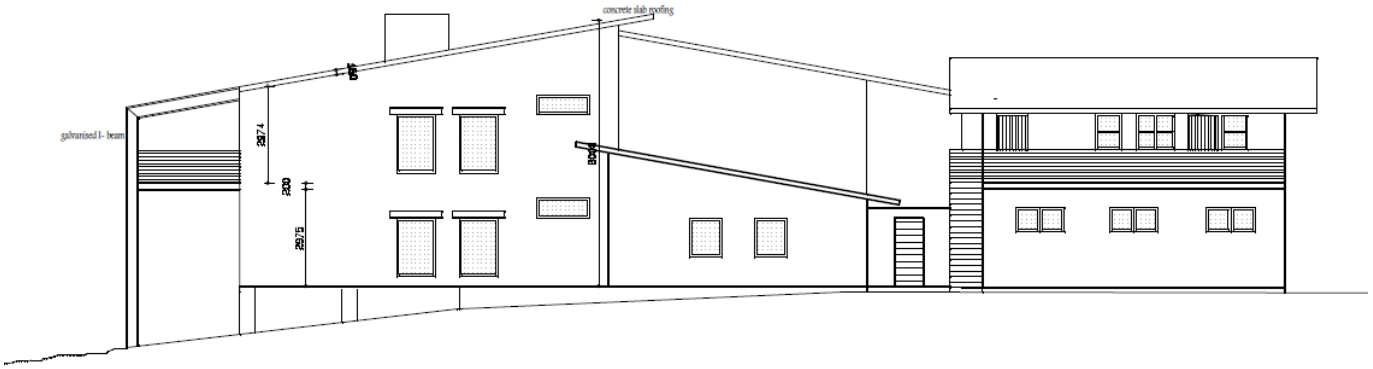

Figure 4: West elevation

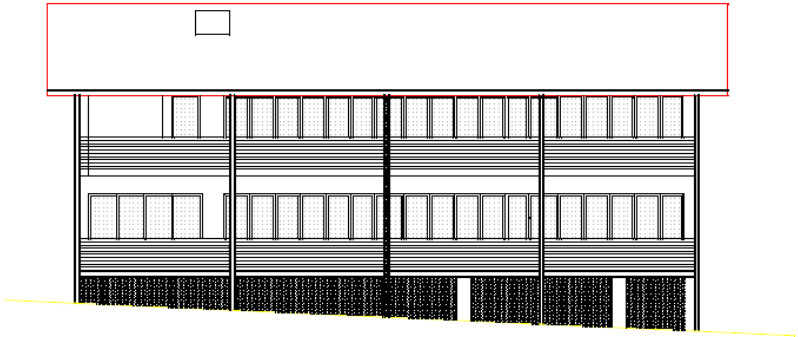

Figure 5: North elevation

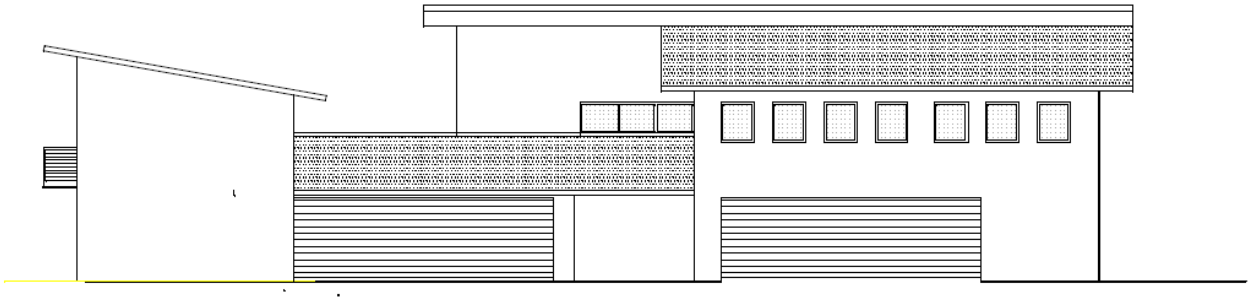

Figure 6: South elevation

Node 2: Outbuilding garage – Elevations relevant to this report

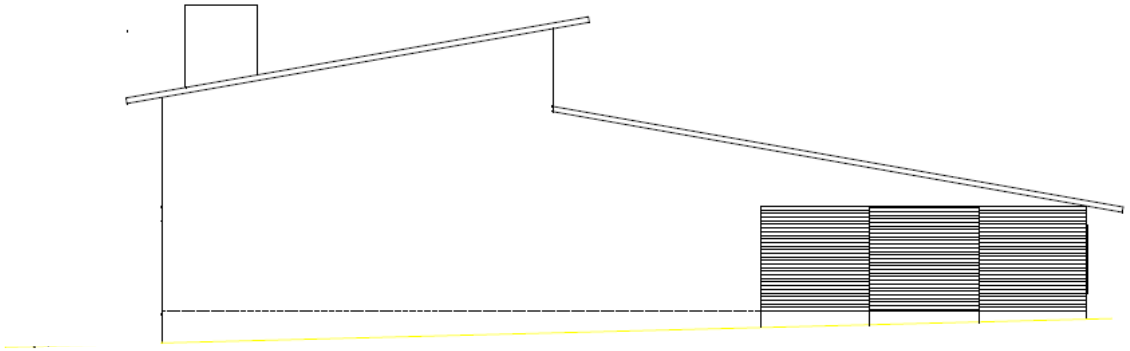

Figure 7: West elevation

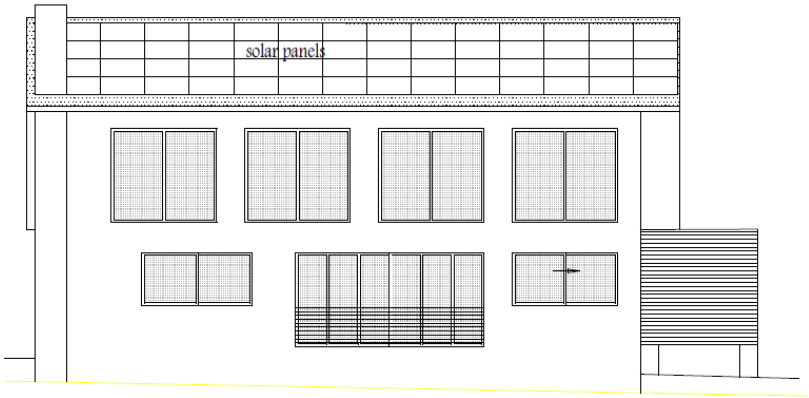

Figure 8: North elevation

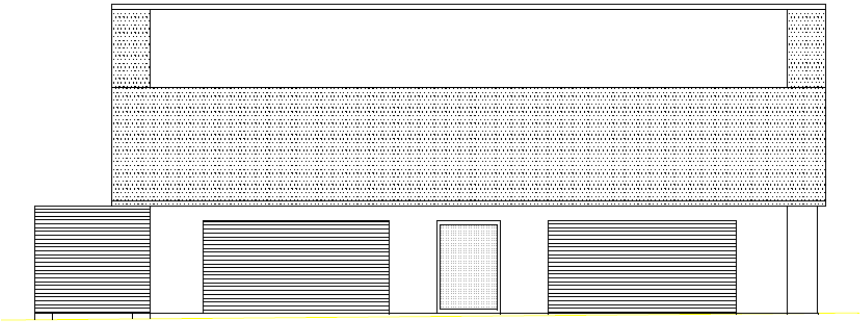

Figure 9: South elevation

1.2 Methodology

The NEMA process to date was subjected to two rounds of public and authority participation. The comments received that relate to the visual environment are summarised below:

- Being on the watershed, this property is located at the highest point of the valley, is highly visible from the adjacent R44 (scenic route) and more importantly is located at the start of the visual and physical experience of the valley that runs from this point down to Pringle Bay bound by the Koegelberg and Klein Hangklip mountains on either side. It is the termination of this valley as one heads towards Rooiels from Kleinmond and this inappropriate proposal would be the last thing seen on this section of the scenic route.
- The Overstrand EMF says, “In rural areas spatial planning must take the existing urban edge and aesthetic value of the surrounding mountainous area into account.” The property is sited at the highest point of the valley, directly after the ascent past Klein Hangklip, as the R44 descends towards Pringle Bay alongside the Koegelberg range. It is therefore very visible from the R44, which is a designated scenic route. It would impact very obviously on the start of the visual experience of all those driving along that road.
- The applicants acknowledge that the Provincial SDF emphasizes the importance of conserving provincial scenic resources and that this site is on an important scenic corridor, but putting a 30x15m motor showroom into a view cannot but make the scene one of a showroom, not one of the scenic corridor.
- The proposal purports that not developing the rest of the plot preserves it. But they are not allowed to develop the rest of the site in any event. And this aggressive siting of a totally unsuitable building is all that would draw the eye. If it is to avoid further detracting from the existing conservation area and impacting on both the biosphere and the adjacent reserve the proposal should be amended so that it lies within the previous building footprint and height.
- It is clear from the submission/ proposal, that the crucially important and required visual impact assessment has not been done or provided. We are convinced that such study would demonstrate an inappropriate visual impact of the proposal.
- Concerned about the incremental erosion of title deed condition and land use legislation, leading to a loss of the sense of place, character and special environmental quality of the village of Rooiels and its surrounds.

As a result, a Visual Assessment was commissioned. The following steps were used in the visual assessment process:

- A site visit and visual survey of the site and surroundings;
- Description of the receiving environment and the proposed project;
- Indication of the nominal viewshed and important view corridors on a map, based on topographic information;
- An assessment of the character of the landscape to determine visual characteristics, scenic resources, receptors, and visually sensitive areas;
- An indication of quantitative and qualitative criteria, which would be used to measure visual impacts;
- Indication of potential visual impacts using established criteria;
- Provision of visual guidelines and mitigating actions to follow in order to reduce potential impacts
- Description of further mitigation measures and monitoring programmes.

1.3 Definition of 'Visual'

The term 'visual' used in this report is taken in its broadest meaning to include visual, scenic, aesthetic and amenity values represented by the natural and the built environment, which can in totality be described as the area's 'sense of place'.

1.4 Previous Studies & Declaration

Paul Slabbert – B Art Et Scien (Planning Honours Degree), has 20 years' experience in heritage and visual assessments, and is registered with the Association of Professional Heritage Practitioners (APHP) since 2007.

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

- other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity;
- in terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any report, plan or document prepared or to be prepared as part of the application; and
- am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (as amended).

Signature of Specialist:

Name of Company: PHS Consulting

Date: 2023-11-09

2 DESCRIPTIONS OF VISUAL CHARACTERISTICS (SPATIAL ANALYSIS)

2.1 Location

The location of the study area in relation to Rooiels, neighbours, and the R 44 is shown on Figure 1. The previously developed footprint in relation to the proposed development is depicted on Figure 2 above. The rational for the development is explained in the Basic Assessment Report, but in summary, the application area consist of two nodes as determined in the NEMA process. Due to wetland and botanical constraints the maximum size of node 1 and 2 was informed by specialists. Both nodes are located on or partly on previously developed footprints that are serviced. The nodes proximity to each other will allow the owner to facilitate security and general management of the site in the most effective manner. Node 1 is a redevelopment of the previous house that burned down. The owner has the need for a large garage to

store collectable vehicles which will allow this hobby to be practiced on the 24.02 ha farm. Given aquatic and botanical constraints the size of development node 1 was not sufficient to accommodate the garage, therefore the addition of node 2. The total development footprint equates to 0.67 % of the farm with the remainder being proposed for a conservation agreement with Cape Nature. The site is one of many smallholdings (Figure 3 yellow outlines) in the area between Rooiels, Pringle Bay and Betty's Bay that has similar development presidents being set to date.

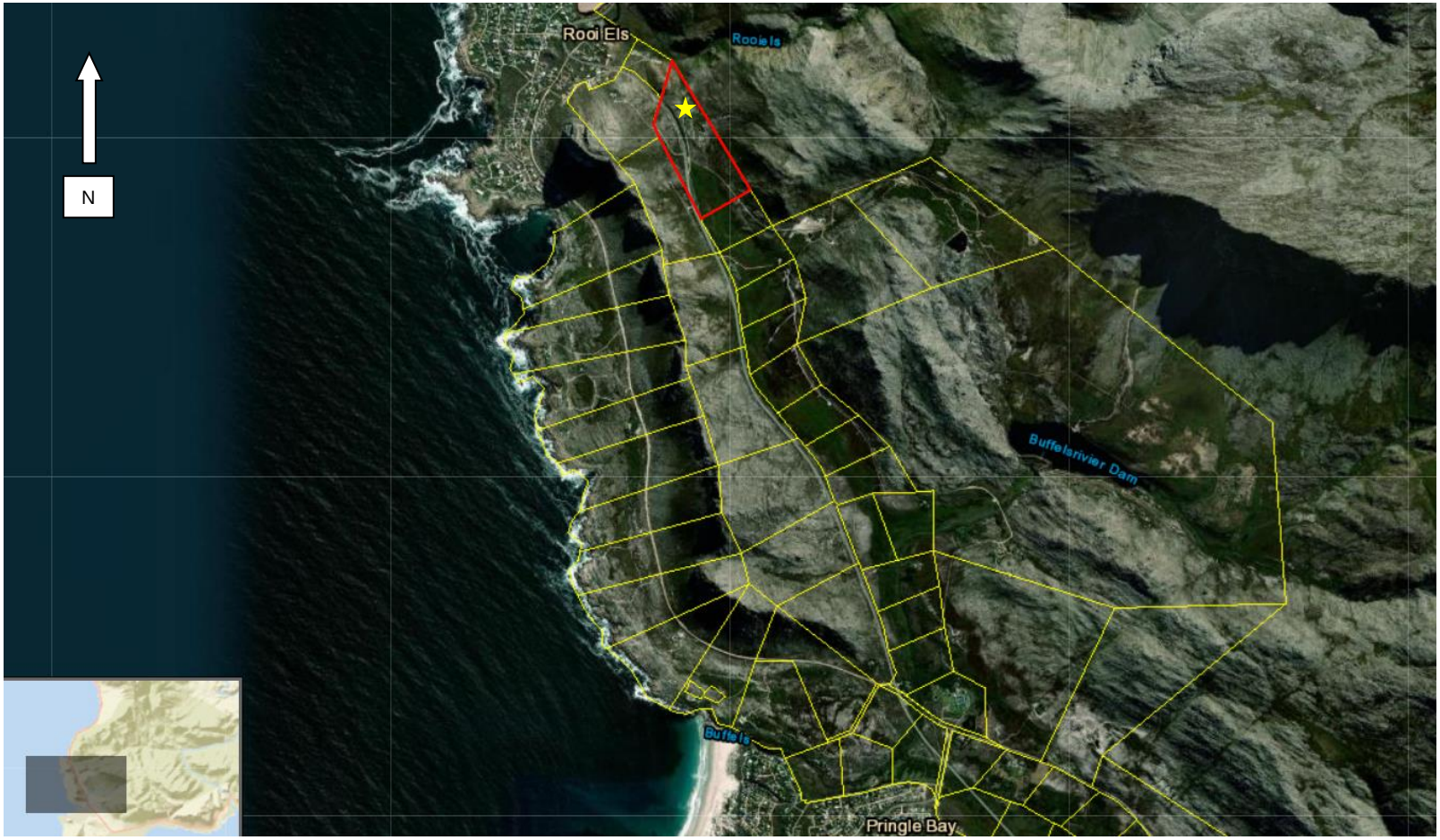

Figure 10: The application Farm in red and proximity of the two nodes in yellow star, in relation to the large number of smallholdings between Rooiels and Pringle Bay as per yellow subdivision pattern.

2.2 Description of the Terrain

The accessible parts of the farm that were developed or disturbed over the years are mostly level with moderate slopes. Three main roads exist, two of the roads over the farm provide access to neighbouring smallholdings to the south and west, the R44 dissect the site, part of the old R44 provides access to node 1 & 2 (the site). The Eskom power lines, and main transformer is located between node 1 & 2, and an existing borehole provides water to the site. Due to the proximity of the site to the road network, an area on the watershed was used to stockpile road construction material and a small dam is present just south of the old stockpile site, this watershed zone is approx. 98 - 100 m above sea-level. The steeper areas on the farm are natural and undeveloped except for the steep access road providing access to the western neighbouring house. The application area is located below the watershed on the lower north facing slopes with node 2 on approx. 92 m and node 1 on approx. 86 m above sea-level, therefore approx. 8m and 14m lower than the watershed.

The site is on the northern side of the watershed on gentle undulating terrain before sloping down dramatically towards the north with views over Rooiels and the False Bay coastline. The site is confined by the R44 to the west, watershed on the south, expansive mountainous terrain towards the east and north, and the Rooiels river gorge to the north that runs east to west from the Kogelberg mountains to the sea. The site enjoys magnificent views towards the north, northeast, and partly northwest overlooking the Rooiels area, Kogelberg and False Bay. From the watershed above the site, watercourses drain south into a valley bottom wetland system towards Pringle Bay. The site proposed for development is on a fairly level natural terrace outside delineated watercourses and wetlands and mostly inside previously disturbed areas, requiring an approx. 890 m² of indigenous vegetation clearance. Some of this indigenous vegetation was cleared previously but has been restored since.

Figures 11, 12 & 13, below represent the landscape on and next to the site. The red arrow indicates the elevation position on site and the terrain elevation profile image directly below. The position of the R44 and Rooiels River is indicated for orientation and evaluation purposes.

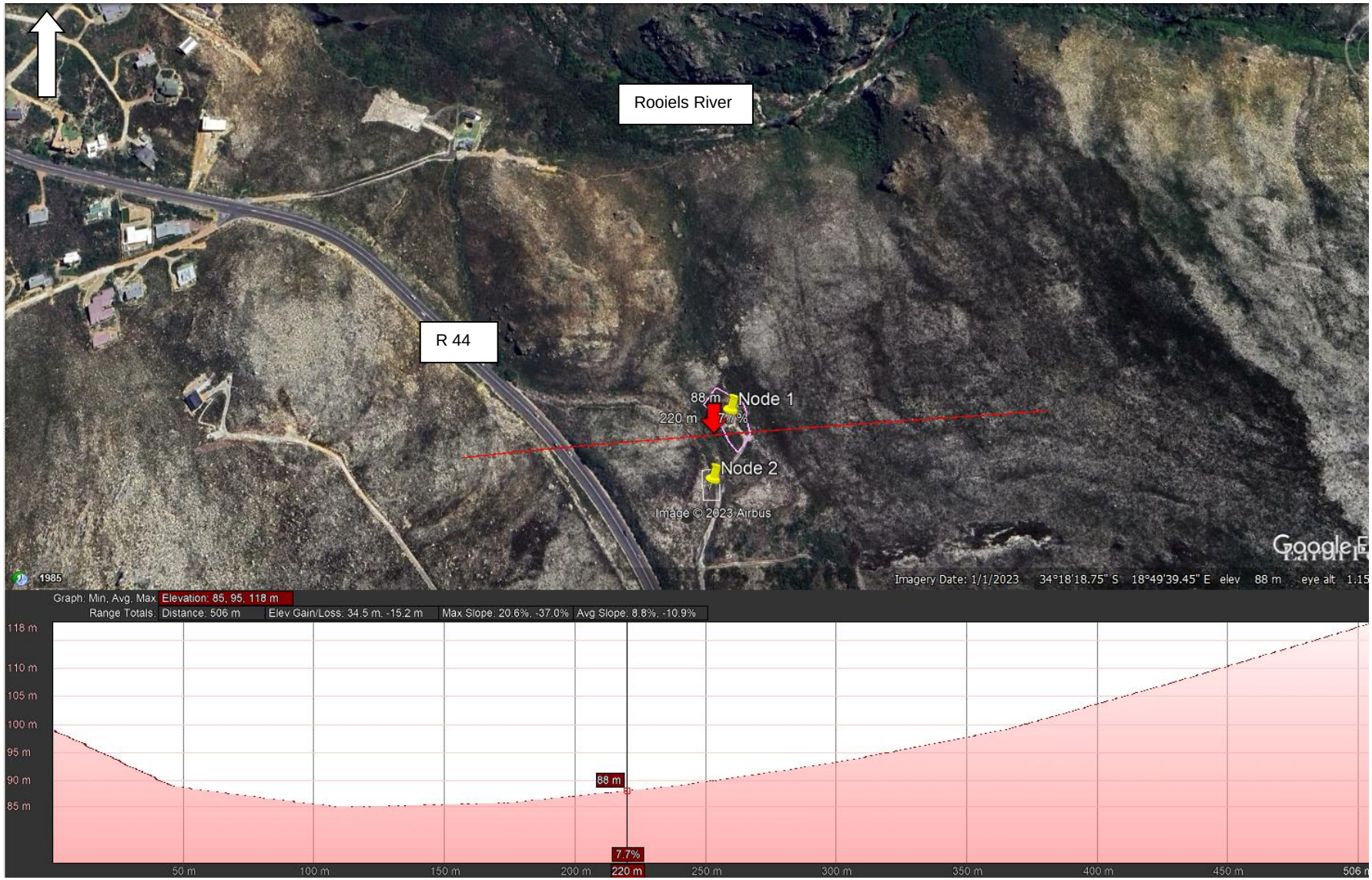

Figure 11: Site terrain, east west red line, depict open valley and level nature of the site with mountainous terrain to the east and west.

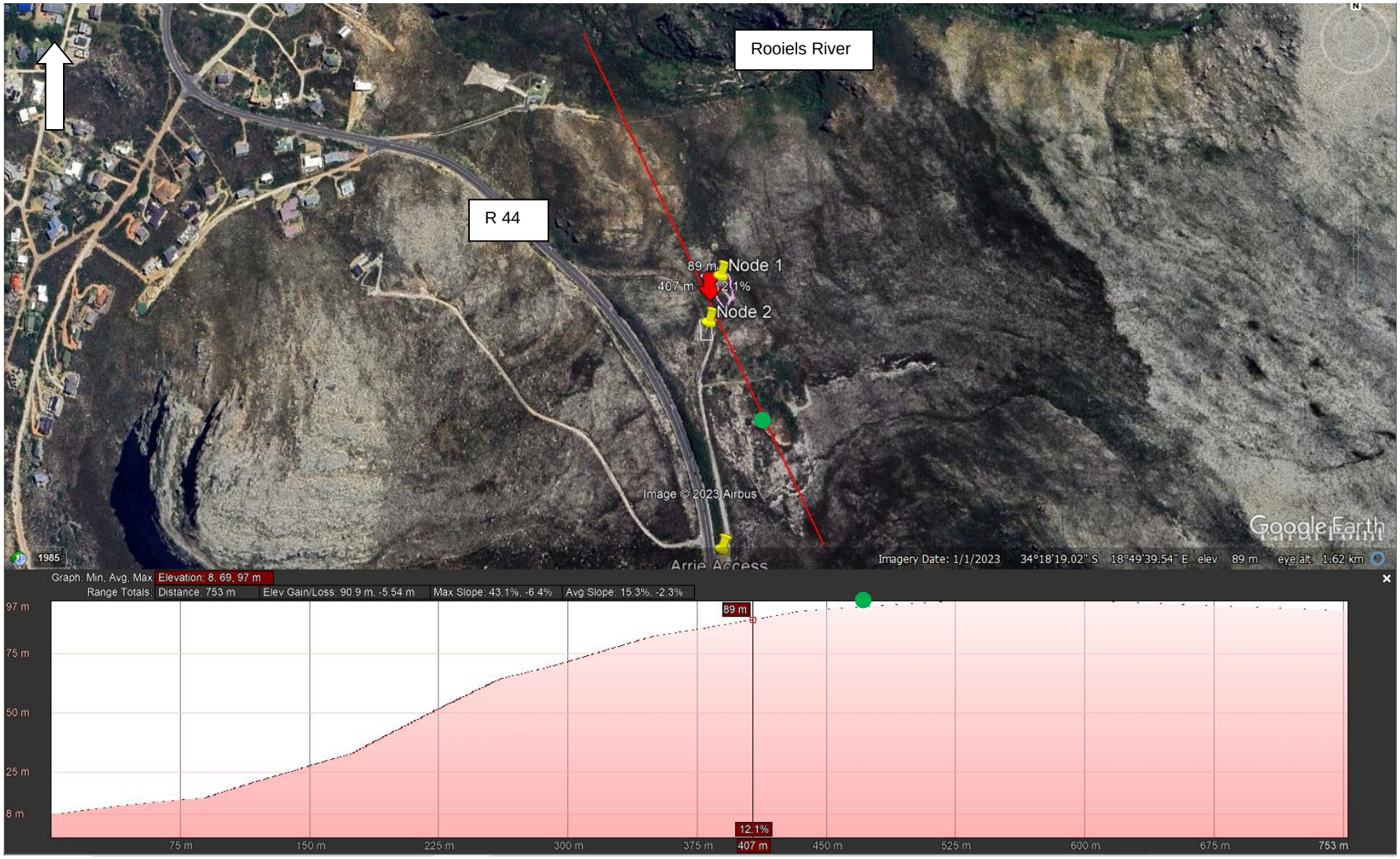

Figure 12: Site terrain, northern river valley gorge close to sea level, leading up towards the site along steep slopes with the site between 8 – 14 mm below the watershed indicated in green dot.

Figure 13: Zone of visual influence (purple circle) is approx. 1.5 km from the site (red dot), due to topography three primary viewsheds exist (green dotted lines) that define the main view corridors (1 – blue; 2 – yellow; 3 - orange), where the site is possibly visible to receptors. A secondary manmade viewshed exist in the form of the R 44 road embankment cutting indicated in white dotted line.

2.3 Photo Report

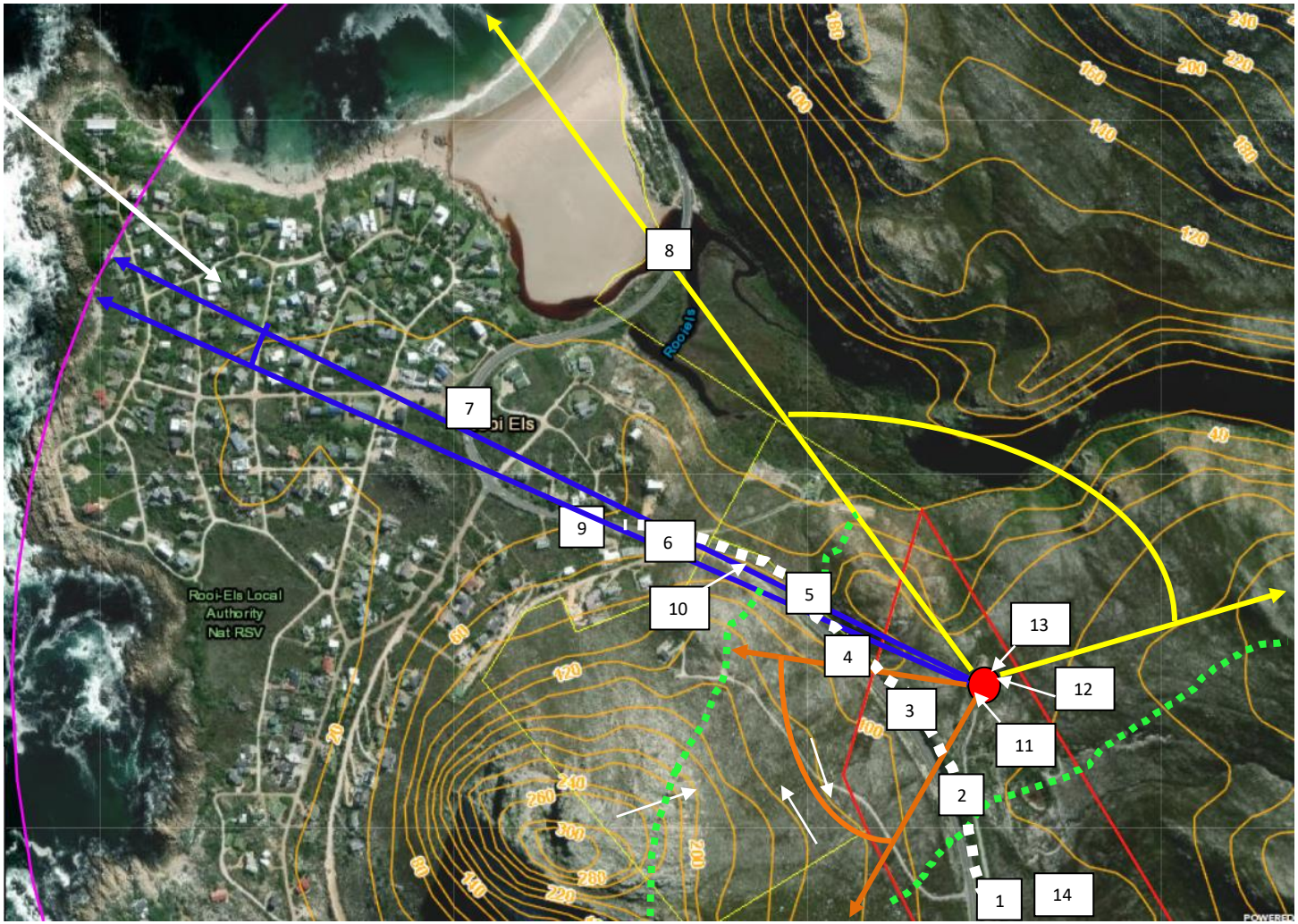

Figure 14: Photo Positions

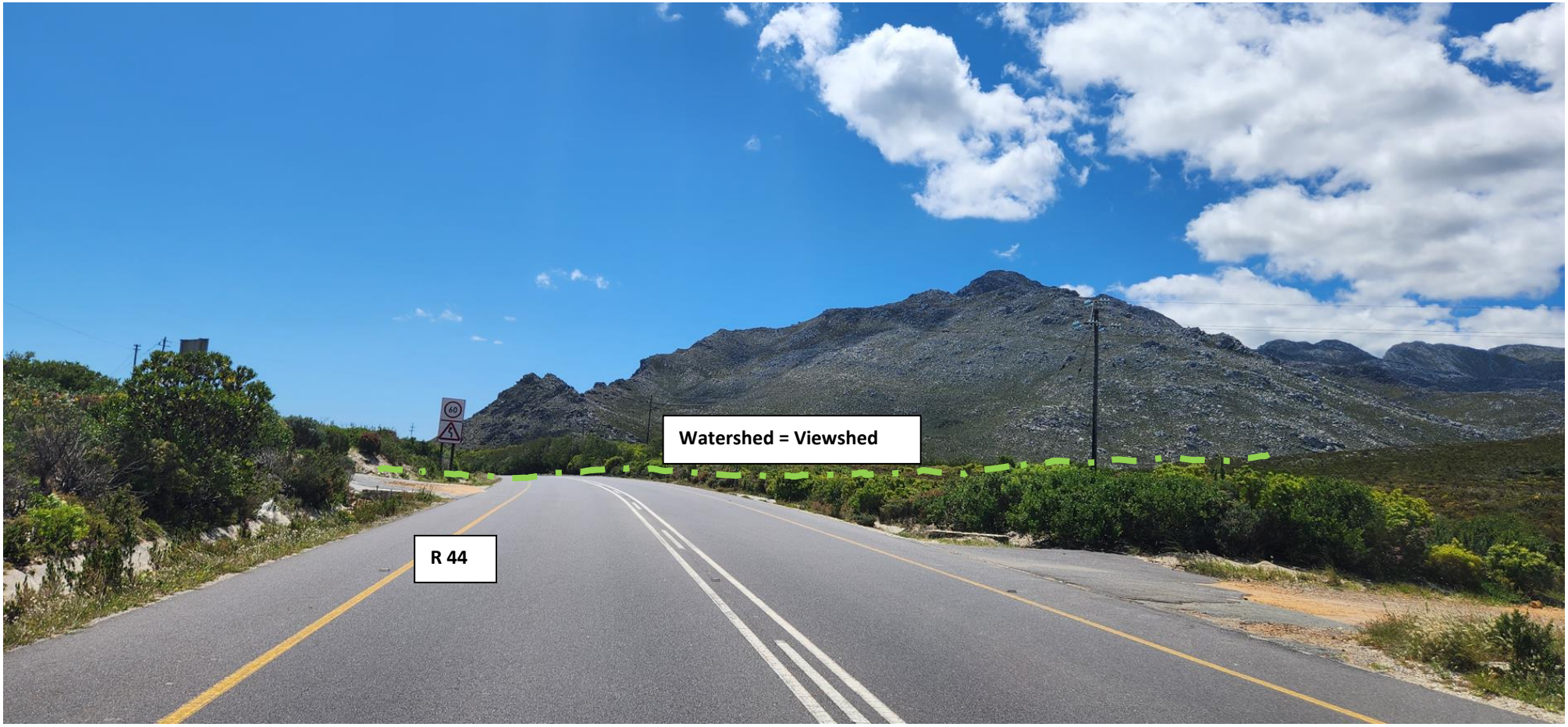

Photo Position 1: Taken on the southern side of the watershed from the R 44, view towards the north, the site is not visible from the R 44 at this point. Entrance to the site on the right and access servitude over the farm to neighbours on the left.

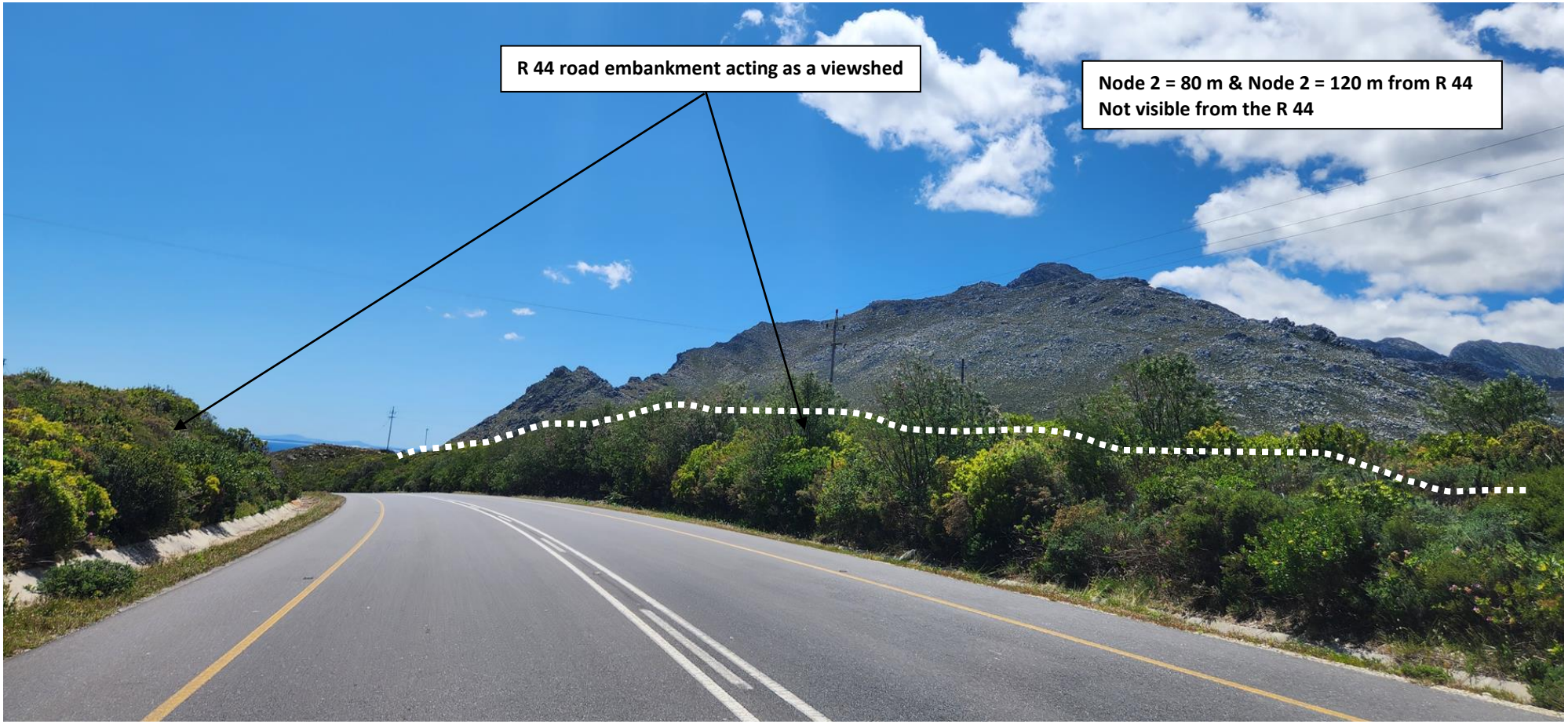

Photo position 2: Photo taken on the northern side of the watershed from the R 44 towards the north. The electricity pole at the site with ceramic stops on the top is not visible from this position. Note the R 44 cutting starts to show on both sides of the road, acting as a viewshed, hiding the site from the road. Node 2 is 80 m from the R44 and node 1 is 120 m from the R44.

Photo Position 3: View from the R44, photo taken right opposite the site, the road cutting, and vegetation is approx. 8 m high. Eskom power take-off to the site in yellow, direction and power line to site in yellow arrow clearly drops. The site is not visible and the 11m high Eskom pole on site is not visible either. The telephone pole marked with green arrow is not the power point on the site and doesn't have relevance to this report. Note how the mountain peaks in the background are hidden from this viewpoint.

Photo Position 4: View from the R 44 towards the east, the road verge cutting is now at its lowest. This is on the edge of the narrow view corridor 1, in this photo the Eskom power pole is not visible yet.

Photo Position 5: Taken from the R44 towards the east, half of the Eskom pole is visible, due to a secondary viewshed above the old R 44. This photo is inside the view corridor number 1.

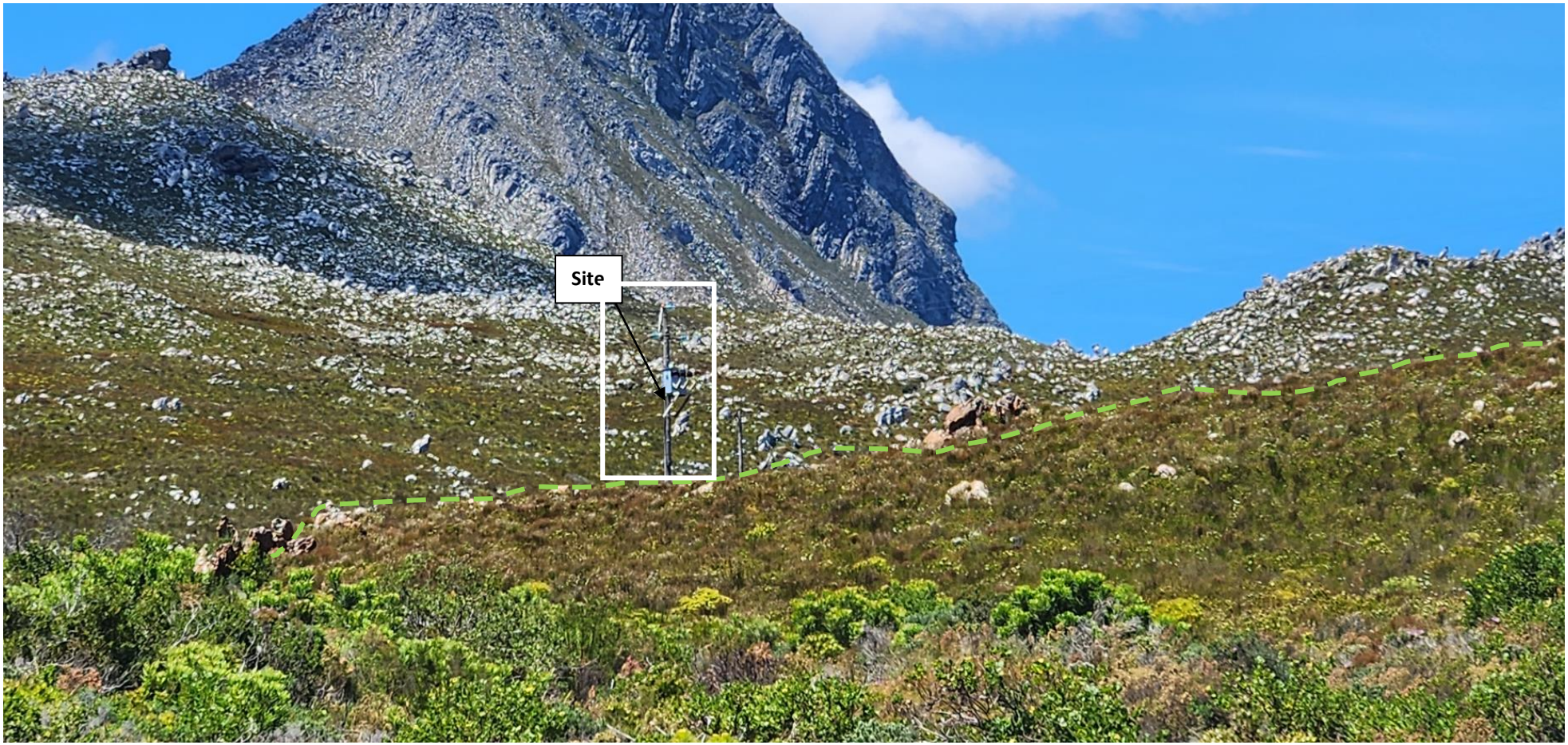

Photo Position 5: Taken from R44, zoomed in from the same position than the previous photo. Half of the 11m Eskom pole is visible. The site is partly hidden behind secondary viewshed. Therefore 5.5 m is hidden.

Photo Position 6: Taken from the R44, 300 m from the site, view towards the northwest. Note the urban landscape and precedent being set of development on the ridgeline.

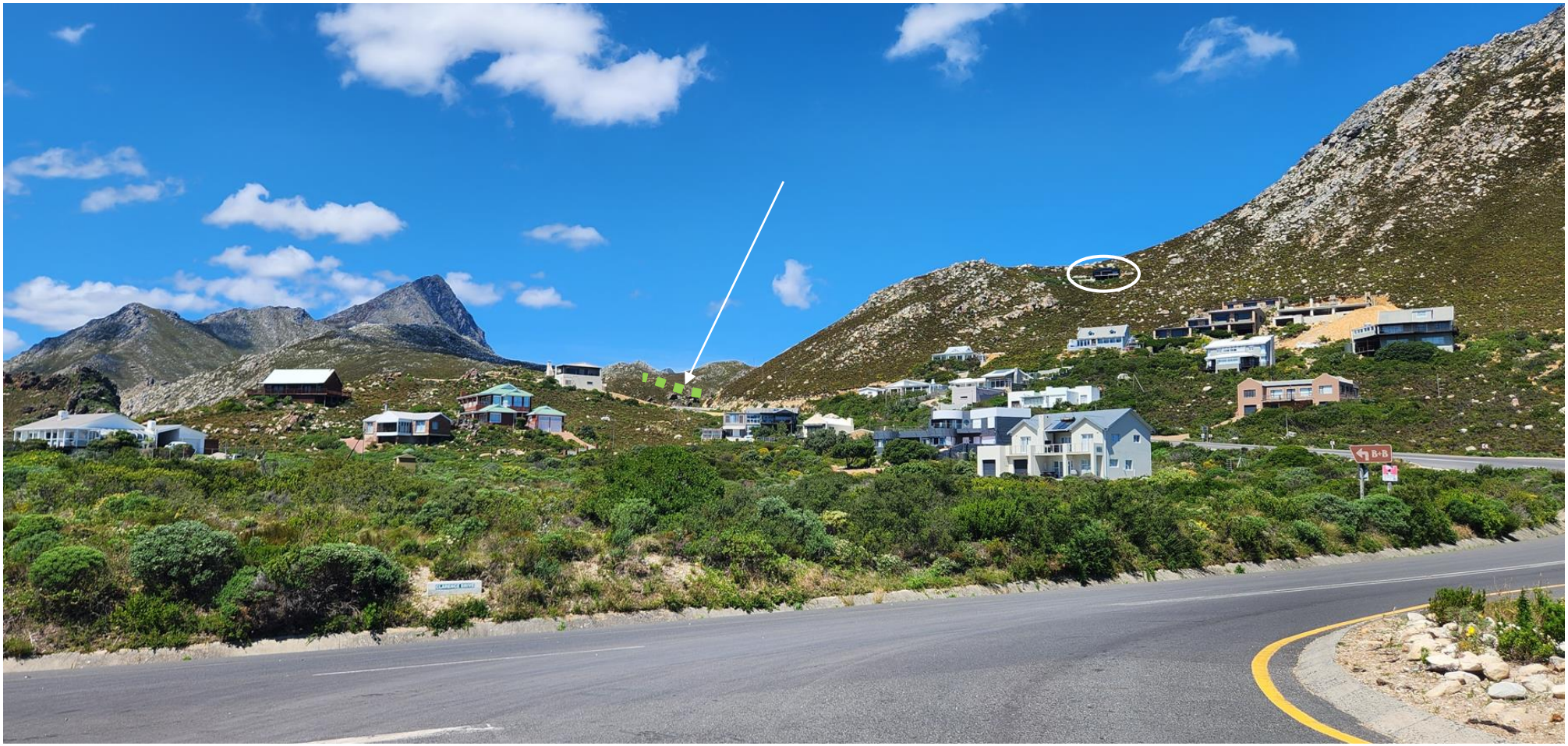

Photo Position 7: Taken from Anemone Street, the main entrance to Rooiels, towards the east, the site is not visible its hidden behind various viewsheds. Site position indicated with white arrow, behind green viewshed. Note nature of development in Rooiels. Note the applicant's neighbours house (white circle) high against the slopes, the building is not on the ridgeline and it was finished with charcoal and wood tones as visual mitigation.

Photo Position 8: Photo taken from the R 44, Rooiels river in picture, node 1 partly exposed, but below the ridgeline, node 2 is hidden behind viewshed. Site position pointed by white arrow. View corridor 3 is in picture, primarily natural on the left. The houses on the right can't see the site.

Photo Position 9: The site is not visible from the R 44 due to viewsheds. Note the visual nature of the houses in the landscape. This photo was taken towards the east. View corridor 1 is in picture, on a short section on the R44 the site is visible (Photo 5), throughout large parts of this corridor receptors views are blocked by secondary viewsheds.

Photo Position 10: Taken on the R 44 towards the east, site not visible hidden behind viewshed. View corridor 1 is in picture, on a short section on the R 44 the site is visible (Photo 5), throughout large parts of this corridor receptors views are blocked by secondary viewsheds.

Photo Position 11a: Taken from node 2 on site towards the northwest, Rooiels River bridge and residences in town not visible from this node due to viewshed in green dotted line. The R 44 is only visible for a short section, pointed with white arrow. The Eskom power pole used as indicator is in view.

Photo Position 11b: Taken on node 2 on site towards the north west, Rooiels River bridge and residences in town are not visible from this node due to viewshed in green dotted line. The R 44 is not visible, neither are vehicles on the road or any road signage. The Rooiels bridge is not visible. Only in the distance roofs of a few houses against the sea are visible, this is on the edge of the 1.5 km zone of visual influence, in view corridor 1. The Eskom power pole used as indicator is in view.

Photo 12a: Taken from the indicator Eskom pole on site towards the northwest. Node 1 old house site in view on the right. The Rooiels river bridge is visible from this node. View corridor 3 is in picture, primarily natural to the north with limited to no receptors. Only receptors on the R 44 and bridge can see this node.

Photo 12b: Taken from Node 1 old house towards the R 44, view corridor 1. The road is not visible, neither are vehicles traveling on the road. This is proven because only the top of a road sign is visible. The insert on the right show that the vehicle is below the part visible from the site.

Photo 13: Taken from the site towards the west, mountainous area part of the farm, with access servitude pointed with white arrow in favour of the neighbour whose house is not visible from the site.

Photo 14: Taken from the south of the watershed towards the south. Pringle Bay in the distance but notably the landscape is divided in various small holdings with development scattered in the open landscape, therefore a precedent is set for development along the R 44 and inside the natural landscape.

2.4 Viewshed and View Corridor

The viewsheds define the view corridor and view catchment area, basically the zone within which the proposed development would be visible. A zone of visual influence relates to the various viewsheds that exist and the distance a normal human can realistically see objects (1.5 km). It is plotted in Figure 13 and 14, which also indicates 'view shadows' (where the site can't be seen). The site where the two development nodes will be located is on the northern side of a watershed that is approx. 98m – 100m above sea level. Receptors on the southern side cannot see the site. Node 1 is on the 86 m and node 2 on the 92 m contour respectively. Considering that the highest part

of the roofs will be 8m, the addition of 8 m to the site elevation of node 1 & 2 results in roofs top on node 1 to be below the watershed and rooftop on node 2 be level with the watershed, therefore not likely to be visible from the south. Site visibility from the north will primarily be a consideration. Due to topography and the location of the winding R44 and road cutting into the landscape, the site is inside a view shadow, basically hidden from the road and residents in Rooiels.

Three main view corridors exist:

- The first is a very narrow view corridor 1 towards the north west, with a pinched view from approx. 200m out on the R 44, only the top part of the site can be seen approx. 5,5 m from ground level is hidden, only the middle to top of buildings will be visible. Receptors will be driving 60-80 km/h. In this corridor a further narrow distant (1.5 km) view from a few coastal residences in Rooiels exist. If receptors are still and focused on this narrow corridor, they could see a spec.
- View corridor 2 towards the north, is a wide natural corridor with no receptors (maybe the od hiker) in the wilderness except for a partly hidden distant 800 m to 1000m view close to sea level from the R 44 Palmiet River bridge. Users will be driving at 60 to 80 km/h towards the south, mainly focused on the road and immediate surrounds.
- View corridor 3 towards the south west, is limited to an immediate view of the mountainous terrain owned by the applicant where a road servitude provides access to a neighbouring house that is hidden from the site. The neigbour will see the development when using the road.

Receptors are individuals likely to experience or receive visual impact. In other words, a receptor located in a view corridor will only see objects in front of the viewshed, the objects behind the viewshed will be in the view shadow and therefore not visible to a receptor. With reference to the site analysis and photos above, the proposed development is only partly visible from the R44 road users and a few distant views. This relates to limited and sporadic visibility. The likely receptors of visual impact are within the three view corridors indicated on Figure 13 and 14 from where we will now evaluate the likely impacts.

The assessment revealed that three view corridors exist with various limited receptors.

1) **View corridor 1 (blue); Photo 5, 11b & 12b:** The receptors are traveling at an average speed of 60 – 80 km/h, it's a combination of residents, tourist and business movement in the area. The current experience of road users traveling through Rooiels relate to large residences on the ridgeline and against the mountain slopes consisting of various shapes, sizes and colors resulting in a distinct pattern in the landscape, setting the tone for the receptors overall experience. The site can only be seen when traveling south on the R 44. The approx. distance the road user can possibly see the site is along a 100 m section on the R 44. In the photos it's clear that the site is identifiable when standing still on the side of the road but considering the road is only used for driving vehicles (no stop or viewpoint areas along this section) a view of the site is probably going to be lasting for few seconds. These receptors are driving at high speeds, the embankment is high and primarily shielding views of the site that were developed in the past. When the small window opens only the top part of the new infrastructure will be visible because the bottom part is hidden by a secondary viewshed. Considering all the houses in Rooiles area that have been observed in the landscape, these road users would not likely experience the proposed development as unusual in their view frame.
2) **View corridor 2 (yellow); Photo 8, 11a & 12a:** The receptors are R44 road users traveling south at 7m above sea level. Road users traveling north will not have a view of the site. Views are from 800 m to 1000m, a considerable distance from the site when crossing the Rooiels River bridge entering Rooiels. These road users are traveling 60 to 80 km/h with the entire Rooiels urban landscape opening up in front of them. Existing houses are located on the ridgeline and against steep mountain slopes. The development will be absorbed in this view frame and it will not be seen as new or distracting at this distance and in the

context of the viewframe. Only node 1 is visible, but its against the backdrop of the Kogelberg mountains behind it and it use to have a house on it, therefor it's not new. A new building on the existing disturbed site will not be experienced negatively in the receptors view frame.

3) **View corridor 3 (orange); Photo 13:** The R44 is west of the site but visually separated from the site due to the deep road cutting. The road shoulder, rising contour and vegetation is approx. 8 m high opposite the site. The old R44 road running through the site was also subjected to a road cutting, node 2 is located partly on this old road and node 1 is lower than node 2. The result is a approx. 70 m wide naturally vegetated "berm" separating the receptors on the R 44 from the site, making it highly unlikely to see the proposed development within this corridor. The current R 44 and old R44 is on approx. the same height but separated by the high vegetated berm due to the road cutting. The receptors are limited to the neighbour using a servitude access road to their house. When on this road the user can see the site but the neigbours house its hidden behind a viewshed. The servitude road user lives in a house on the ridgeline overlooking urban Rooiels, considering that the site was previously developed its highly unlikely that the neighbour will experience a deteriorated visual experience while using the road servitude to their house. No receptors exist that will experience visual impact within this view corridor.

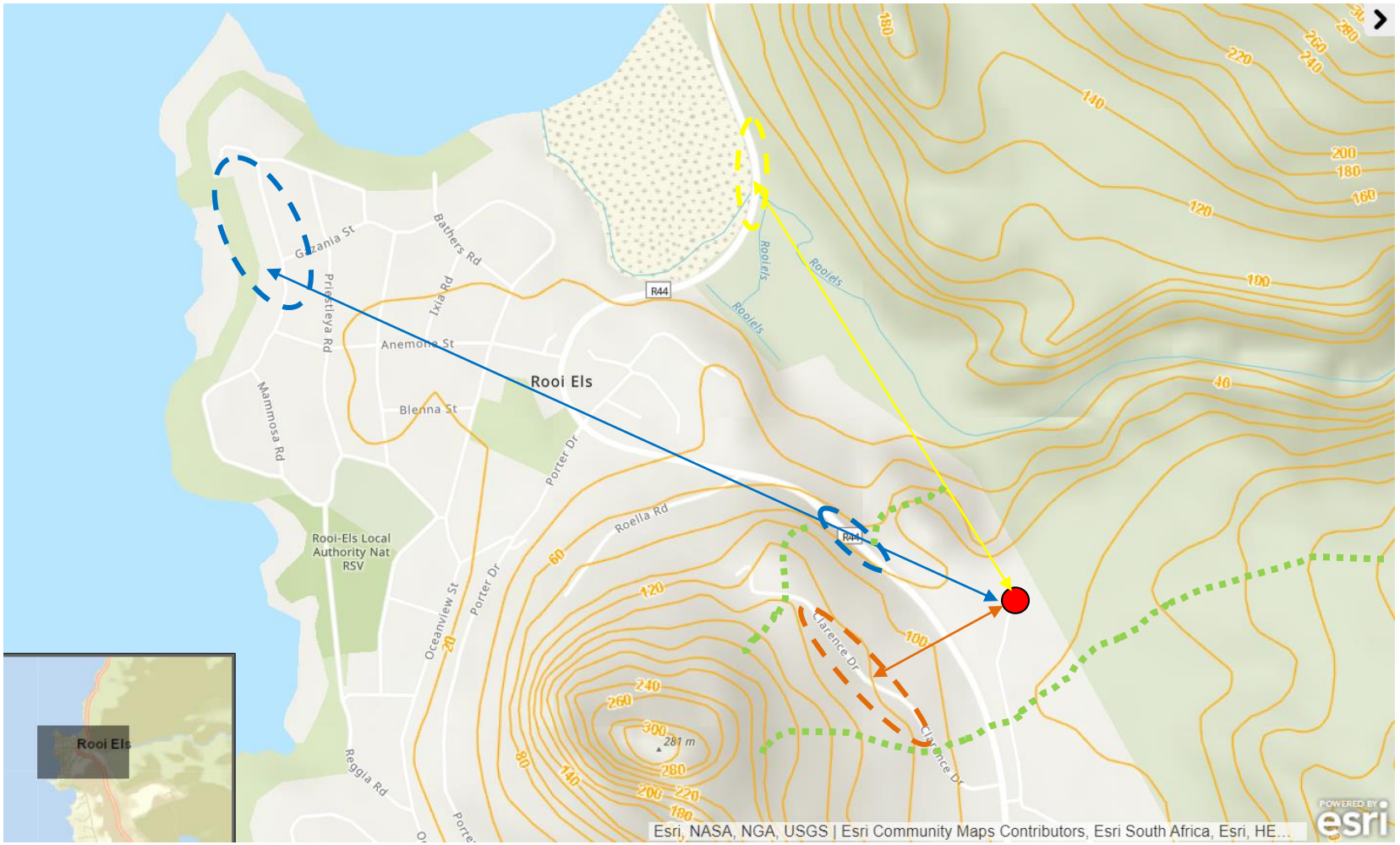

Figure 15: Receptors of potential visual impact. Blue is pinched and distant. Yellow is distant. Organe is a neighbour servitude infrequent use.

2.6 Visual Significance of the Area

The visual significance rating for the rural area between Rooiels and Pringle Bay is regarded as having a “very high landscape significance” as per the Overstrand Heritage Survey (OHS) Report dated December 2009. The R 44 is regarded as a scenic route in term of the OHS and the subject site is in a Heritage Overlay Zone (HOZ) primarily

due to the areas setting between mountain and sea. The OHS further states that the coastal terrace, with its high scenic and amenity value, is the zone in which historically most development has taken place, and where the most pressure still exists for expanding residential townships. The foothills where the subject site is, which is on weathered granites and shales, and which have the most productive soils, have historically been used almost exclusively for farming, although these rural pockets are coming under increasing pressure for low-density residential development. The OHS requires that areas inside the HOZ requires controls to protect the heritage and natural environmental value. In this case the development is small scale and it does not trigger the requirements of the National Heritage Resources Act. The controls being applied in this case relate to an application in terms of NEMA to ensure that the environmental impact is assessed and mitigated to an acceptable level.

The Overstrand Spatial Development Framework (SDF) dated May 2020 depicts the R 44 as an important scenic corridor. The subject site is located inside the Heritage Protection Overlay Zone (HPOZ) regarded as a sensitive development zone. The SDF refers to architectural treatment particularly on steep slopes and highly visible locations adjacent to the scenic route, it further promotes a unique village rural character of Rooiels. The SDF promotes that rural development of Rooiels be carefully considered and that it needs to be sensitive to protect the heritage and environmental resources. As per above the NEMA process is tailored to assess and evaluate the impact on these resources and this VIA addresses the visual impact on the scenic resources.

The subject site is located on a naturally level terrace in the landscape and development on node 1 is on a previous residential footprint and node 2 is partly located on the old R 44. The site is on the edge of the town of Rooiels and the proposed scope is equivalent to the residential development in an around Rooiels and on the surrounding smallholdings. The proposal entails a clustered approach advised by specialist ecologists, that relates to 0.67% of the entire farm portion and as per the applicant the remainder will be conserved for the long term via a conservation agreement.

With reference to the view corridors the sensitivity is reduced due to the level nature of the site, the buildings are located high above Rooiels but this is due to the location of the farm in the foothills, similar to many other developed farms in the area. In the context of the farm's topography, the buildings are not located against steep and highly visible slopes. The development is proposed below the ridgeline where existing services are available. Due to the dramatic changes in topography in the area and the deep R44 cutting, numerous viewsheds exist that resulted in view shadows mostly "hiding" the buildings from receptor views resulting in a reduction in sensitivity. Considering the development is regarded as small scale on a site that was previously developed it should not change the receptors experience negatively. It can't be disputed that the site and immediate surrounds has already been changed by land-use and structures that can't be reversed. This change and the narrow and distant views of the site characteristics reduces the high landscape significance for the site to medium significance.

If the development can conform to architectural mitigation, with the addition of landscaping and restoration work on disturbed areas, it will limit visual impacts, and allow the buildings to be absorbed in its natural surrounds. The neighbours house positioned in a highly visible location (compared to this proposal) as per photo 7 is an example that visual mitigation is feasible.

3. VISUAL ASSESSMENT CRITERIA

The description of the environment is undertaken with a view to presenting information for the VIA. A series of both quantitative and qualitative criteria, listed below, are used to measure the value and sensitivity of visual / scenic resources, and ultimately the potential impacts on these. When the criteria below are considered in combination, an indication of the visual sensitivity of the property, and the potential visual impacts can be determined. This in turn gives an indication of the type of mitigation measures required.

Based on the assessment up to this point, evaluation of the site and statutory planning documentation the assessor referred to Oberholzer, B. 2005. *Guideline for involving visual & aesthetic specialists in EIA processes: Edition 1.* CSIR Report No ENV-S-C 2005 053 F. Republic of South Africa, Provincial Government of the Western Cape, Department of Environmental Affairs & Development Planning, as a guideline going forward.

First the category is defined, and in this case **Category 2** development apply.

Category 1 development: e.g. nature reserves, nature-related recreation, camping, picnicking, trails and minimal visitor facilities.
Category 2 development: e.g. low-key recreation / resort / residential type development, small-scale agriculture / nurseries, narrow roads and small-scale infrastructure.
Category 3 development: e.g. low density resort / residential type development, golf or polo estates, low to medium-scale infrastructure.
Category 4 development: e.g. medium density residential development, sports facilities, small-scale commercial facilities / office parks, one-stop petrol stations, light industry, medium-scale infrastructure.
Category 5 development: e.g. high density township / residential development, retail and office complexes, industrial facilities, refineries, treatment plants, power stations, wind energy farms, power lines, freeways, toll roads, large-scale infrastructure generally. Large-scale development of agricultural land and commercial tree plantations. Quarrying and mining activities with related processing plants.

Table 1: Oberholzer, B. 2005

Secondly the expected visual impact is predicted as per Table 2 below, based on the category of development and the type of environment, in this case the site is inside an area of high scenic significance as per SDF and OHS, therefore a moderate visual impact can be expected. However as per section 2.6 above the site-specific character can be used to motivate the reduction in the scenic significance of the site itself to medium, which relates to a minimal visual impact expected. **Therefore, it can be reasoned that minimal to moderate impact can be expected.** But considering the overall scenic importance of the area for the purposes of this report a moderate visual impact will be assed.

Type of environment	Type of development (see Box 2) Low to high intensity				
	Category 1 development	Category 2 development	Category 3 development	Category 4 development	Category 5 development
Protected/wild areas of international, national, or regional significance	Moderate visual impact expected	High visual impact expected	High visual impact expected	Very high visual impact expected	Very high visual impact expected
Areas or routes of high scenic, cultural, historical significance	Minimal visual impact expected	Moderate visual impact expected	High visual impact expected	High visual impact expected	Very high visual impact expected
Areas or routes of medium scenic, cultural or historical significance	Little or no visual impact expected	Minimal visual impact expected	Moderate visual impact expected	High visual impact expected	High visual impact expected
Areas or routes of low scenic, cultural, historical significance / disturbed	Little or no visual impact expected. Possible benefits	Little or no visual impact expected	Minimal visual impact expected	Moderate visual impact expected	High visual impact expected
Disturbed or degraded sites / run-down urban areas / wasteland	Little or no visual impact expected. Possible benefits	Little or no visual impact expected. Possible benefits	Little or no visual impact expected	Minimal visual impact expected	Moderate visual impact expected

Table 2: Oberholzer, B. 2005

Thirdly, Oberholzer then defines visual impact expected as per table 3 below. Note both the moderate and minimal components in the table below.

Very high visual impact expected:
Potentially significant effect on wilderness quality or scenic resources;
Fundamental change in the visual character of the area;
Establishes a major precedent for development in the area.

High visual impact expected:
Potential intrusion on protected landscapes or scenic resources;
Noticeable change in visual character of the area;
Establishes a new precedent for development in the area.

Moderate visual impact expected:
Potentially some affect on protected landscapes or scenic resources;
Some change in the visual character of the area;
Introduces new development or adds to existing development in the area.

Minimal visual impact expected:
Potentially low level of intrusion on landscapes or scenic resources;
Limited change in the visual character of the area;
Low-key development, similar in nature to existing development.

Little or no visual impact expected:
Potentially little influence on scenic resources or visual character of the area;
Generally compatible with existing development in the area;
Possible scope for enhancement of the area.

Table 3: Oberholzer, B. 2005

Lastly, Oberholzer then defines the level of visual input required as per Table 4 below.

Approach	Type of issue (see Box 4)				
	Little or no visual impact expected	**Minimal visual impact expected**	**Moderate visual impact expected**	**High visual impact expected**	**Very high visual impact expected**
Level of visual input recommended	**Level 1** visual input	**Level 2** visual input	**Level 3** visual assessment	**Level 4** visual assessment	

Level 1 input:
Identification of issues, and site visit;
Brief comment on visual influence of the project and an indication of the expected impacts / benefits.

Level 2 input:
Identification of issues raised in scoping phase, and site visit;
Description of the receiving environment and the proposed project;
Establishment of view catchment area and receptors;
Brief indication of potential visual impacts, and possible mitigation measures.

Level 3 assessment:
Identification of issues raised in scoping phase, and site visit;
Description of the receiving environment and the proposed project;
Establishment of view catchment area, view corridors, viewpoints and receptors;
Indication of potential visual impacts using established criteria;
Inclusion of potential lighting impacts at night;
Description of alternatives, mitigation measures and monitoring programmes.
Review by independent, experienced visual specialist (if required).

Level 4 assessment:
As per Level 3 assessment, plus complete 3D modeling and simulations, with and without mitigation.
Review by independent, experienced visual specialist (if required).

Table (Box) 4: Oberholzer, B. 2005

In summary if one considers section 2.6 above a Level 2 input is required, but if the statutory planning documentation is used as reference, then a Level 3 input is required. However, the analysis in this report meets the requirements of both a Level 2 and 3 input.

3.1 Viewpoints (Corridors)

Viewpoints (key observation points), or view corridors, tend to be based on prominent viewing positions in the area, or sensitive viewers identified. The application area was evaluated to determine from what public vantage points the development will be visible. Primary viewsheds were drawn in the landscape to determine where views of new development are possible. As per this assessment three view corridors exist potentially impacting on R 44 users and residences in Rooiels.

3.2 Visibility

Visibility tends to be determined by distance between the development and the viewer. Visibility becomes negligible when distance or speed is involved. The zone of visual influence of 1.5 km was drawn and due to viewsheds it was determined that limited receptors could experience clear visibility.

3.3 Visual Exposure

Visual exposure is determined by the 'viewshed' or 'view catchment (corridor/cone)', being the geographic area within which development would be visible. The viewshed boundary follows ridgelines and high points in the landscape. A zone of visual influence and view corridors are indicated on Figure 10. The proposed development will experience moderate visual exposure. The adjacent areas consist of smallholdings mostly developed with houses and outbuildings and the town of Rooiels are developed with houses on the ridgeline and against steep mountain slopes, the new and old R44 dissect the site with road cuttings resulting in secondary viewsheds. Based on the view corridors drawn and secondary viewsheds inside the corridors the likely impacts on receptors are moderate to minimal due to the small scale of the development and its partly hidden location in the landscape.

3.4 Landscape Integrity

The surrounding landscape plays an important role as an area of landscape significance. Visual quality is enhanced by intactness of the landscape, lack of visual intrusions, and the presence of a strong 'sense of place'. The site and neighbouring properties to the south, west and north are already developed while the Kogelberg mountainous terrain is located to the east of the site. The developed smallholdings to the south and west consist of buildings scattered in the landscape with vast open areas amongst them. The development will be on previously developed and disturbed areas and it is in line with the current visuals in the area, therefore it should not compromise the landscape integrity.

3.5 Visual Absorption Capacity (VAC)

This is the ability of the landscape to conceal or screen structures, mainly by means of topography or vegetation cover, in this case, the location of the site is on a fairly level terrace on the foothills and not against the mountain slopes. Its visual exposure is limited to sporadic and distant receptors. The R44 new and old cutting created a large natural berm between the site and the R44. This berm is covered with dense and tall vegetation acting as further screening. The site is out of sight for most observers in Rooiels and those using on the R44 travel at speeds of 60-80 km/h. The primary and secondary viewshed therefore absorbs the site. Some stationary receptors in the

viewshed can see the site from the urban area over a considerable distance, but the current level of existing development on the ridgeline, against the mountain slopes and on the smallholdings in the area will absorb the proposed buildings as part of the Rooiels landscape.

3.6 Visual Sensitivity

Visual sensitivity is determined by a number of factors in combination, such as prominent topographic or other scenic features. The following factors need to be evaluated:

- The subject site proposed for development is located on a level terraced area below the watershed and ridgeline
- The farm consists of mostly steep inaccessible terrain, with limited areas suitable for development
- The site was previously selected because it's the only suitable location
- Due to topography various primary and secondary viewsheds exist resulting in exposed and hidden areas
- Higher elevations and ridges tend to be more prominent and visible; and
- Steep slopes are more visible from a distance than flatter slopes
- The farm is part of an extended smallholding network between Rooiels and Pringle Bay with various buildings clearly visible in the landscape
- The farm borders the Kogelberg Nature Reserve and the R44 scenic corridor.

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When the criteria above are considered in combination, an indication of the visual sensitivity of the property and the potential visual impacts can be determined. This in turn gives an indication of the type of mitigation measures required.

The nature of the proposal development is very small in comparison to the size of the farm and with the vast open space in the area. The building will be located on primarily a disturbed and developed footprint, buildings will have a maximum 8.0 m roof height and are not likely to stand out. The backdrop of the buildings consists of mountainous terrain, the buildings are not on the ridgeline. The new proposed building will "fill" the existing clearing and sit against a vegetated and mountainous backdrop.

Visual impact has already occurred on and next to the site due to development history, considering the VAC the visual sensitivity of node 1 and 2 is regarded as moderate to low sensitive.

4. SUMMARY OF VISUAL CONSTRAINTS

Based on the field trip and knowledge of the area, as well as the visual criteria set out above, preliminary visual constraints and suitability for development have been determined. These are summarized in the Table 5 below.

Type	Visual Constraints
View Corridors	Due to the location of the site, it is partly visible from the north, north-west and west. The site was previously developed and selected due to site specific criteria. The mountainous terrain and river gorge dominates the landscape. The view corridor 1 from the north-west is very narrow and receptors on the R 44 have a short view section of primarily the top half of the proposed buildings, then a small group of houses 1.5 km away against the coast of Rooiels might see the buildings if they focus. Corridor 2 is a wide corridor but it consists of vast open mountainous area with no receptors (maybe the odd hiker), however this corridors' most north western edge is the R44 approach to Rooiels and Rooiels river crossing from where 800 - 1000 m distant views are possible of only parts of the site. Corridor 3 to the west is the applicant's own property with a servitude road used by the neighbour but the neigbours house is not visible. The new and old R44 road cuttings, contours and vegetation resulted in an approx. 8m high berm visually separating the site from the R44, therefore there are no relevant receptors in this corridor. From the south the watershed acts as the viewshed, node 1 and 2 is below this visual barrier.
Hills and ridgelines	The proposed development will have a restricted footprint confined to primarily a disturbed serviced site currently visible in limited view corridors. The development will be on a fairly level terraced area below the watershed/viewshed therefore not against the mountain slope or on the ridgeline. Node 1 (residential house) previously had a house that burned down which has caused existing visual impact therefore technically no "new" development is proposed in this node therefore no new impact in this node. Node 2 is new but partly on the old R44 cutting resulting in an automatic lower setting, it's also below the watershed and behind the R44 secondary road cutting viewshed, these buildings are therefore not against the mountain slope or on the ridgeline.
Natural areas	The entire farm area is part of the smallholdings in the area, it is primarily mountainous, with wetlands and watercourses. These smallholdings are developed in general, resulting in buildings spaced in the landscape, some on the ridgeline, some against steep slopes and others in level areas. The vast natural area therefore contain development but normally the remainder remains open and natural as in this case. Node 1 and 2 was selected based on a NEMA process resulting in acceptable level of environmental impact and a nodal approach to avoid development to be scattered in the landscape. The remainder of the land will be conserved preferably via a conservation agreement with Cape Nature. The old roadworks stockpile site of approx. 1700 m² will be rehabilitated by the applicant.

Table 5: Visual Constraints

5. VISUAL MITIGATION GUIDELINES

Visual guidelines have been proposed below to inform the development. Please note that these guidelines will mitigate the overall impact and should be incorporated in the Basic Assessment. The architectural mood board presented in the BAR and attached to this report under **Appendix 1** is relevant and acceptable.

The following must be implemented:

- **Development on the footprints as determined in the NEMA process.**
- **Limited additional vegetation clearance in the two footprint nodes only.**
- **Rehabilitation of the old roadworks stockpile area.**
- **Cutting for level footprint into the topography opposed to sitting on top, no forward or upward encroachment.**
- **The use of natural materials, like stone ad wood for finishes.**
- **All roof materials are to be charcoal coloured roof sheeting which meets 30-year warranty requirements. All roof hardware (vents, stacks, flashing etc) must colour match the roofing materials, or be encased into structures.**
- **Roof pitches should be as flat as possible as per the concept on the SDP.**
- **Only painted plaster or bagged walls with a matt finish to be applied and no face-brick.**
- **No bright or light colour paint to be used on the plastered walls, use only natural darker tones. Tones of grey to charcoal has been proven as the best mitigating colour for visual impact.**
- **The colours of windows, fascia's, doors, shutters etc should be consistent and compliment the wall colours, preferably natural wood, grey or charcoal frames.**
- **Lighting is required for the security and safety. However, all lighting shall be directed solely towards the buildings or downwards if attached to the building.**
- **Ground lighting should be mounted on low bollards.**
- **No high mast lighting will be allowed and no lighting shall be directed off the site into the surrounding nature.**
- **Energy saving lights are required and no "naked" spotlights will be allowed.**
- **Warm white outside light bulbs are to be used.**
- **Landscaping should only take place with indigenous and endemic plants.**
- **Due to the high windspeeds exotic trees do not grow successfully, however some indigenous shrubs and trees do reach considerable heights.**
- **Due to fire risk its advised that "fire-scaping" is applied by planting vegetation that is not prone to burn.**
- **A local landscape consultant should be approach for advice on both wind and fire prone vegetation.**

6. VISUAL IMPACT ASSESSMENT

Type	Impact	Rating
Visual exposure of the area	High visual exposure – covers a large area (e.g. several square kilometres).	
	Moderate visual exposure – covers an intermediate area (e.g. several hectares).	**x**
	Low visual exposure – covers a small area around the project sites.	
Visual absorption capacity	High VAC – e.g. effective screening by topography and vegetation;	**x**
	Moderate VAC – e.g. partial screening by topography and vegetation;	
	Low VAC – e.g. little screening by topography or vegetation.	
Landscape integrity	Low compatibility – visually intrudes, or is discordant with the surroundings;	
	Medium compatibility – partially fits into the surroundings, but clearly noticeable	**x**
	High compatibility – blends in well with the surroundings.	
Visibility of the project	Highly visible – dominant or clearly noticeable	
	Moderately visible – recognisable to the viewer	**x**
	Marginally visible – not particularly noticeable to the viewer	
Extent	Site-related: extending only as far as the activity;	
	Local: limited to the immediate surroundings;	**x**
	International: affecting areas across international boundaries.	
Duration	Short term, (e.g. duration of the construction phase);	
	Medium term, (e.g. duration for vegetation rehabilitation to mature);	
	Long term, (e.g. lifespan of the project);	**x**
	Permanent, where time will not mitigate the visual impact.	
Intensity	Low, where visual and scenic resources are not affected;	**x**
	Medium, where visual and scenic resources are affected to a limited extent;	
	High where scenic and cultural resources are significantly affected.	
Probability	Improbable, where the possibility of the impact occurring is very low;	
	Probable, where there is a distinct possibility that the impact will occur;	**x**
	Highly probable, where it is most likely that the impact will occur; or	
	Definite, where the impact will occur regardless of any prevention measures.	
Significance	Low, where it will not have an influence on the decision;	**x**
	Medium, where it should have an influence on the decision unless it is mitigated;	
	High, where it would influence the decision regardless of any possible mitigation.	

Table 6: Visual Impact

7. CONCLUSIONS AND RECOMMENDATIONS

The I&AP comments are summarised in the table below. The VIA provided the following conclusions.

Comment	Conclusion
Being on the watershed, this property is located at the highest point of the valley, is highly visible from the adjacent R44 (scenic route) and more importantly is located at the start of the visual and physical experience of the valley that runs from this point down to Pringle Bay bound by the Koegelberg and Klein Hangklip mountains on either side. It is the termination of this valley as one heads towards Rooiels from Kleinmond and this inappropriate proposal would be the last thing seen on this section of the scenic route.	Node 1 & 2 is below the watershed therefore not highly visible. The experience of receptors also relates to various houses that has been developed and will be developed in future along the R44, against steep slopes and on ridgelines, due to the historic subdivisional pattern. This VIA determined that the site is partly visible within three view corridors, that offer limited and sporadic views only when the road users travel to the south. These road users are traveling at 60-80 km/h and considering the small window due to various viewsheds and the various houses in Rooiels and beyond, it's not the last or the first glimpses of development to be seen.
The Overstrand EMF says, "In rural areas spatial planning must take the existing urban edge and aesthetic value of the surrounding mountainous area into account." The property is sited at the highest point of the valley, directly after the ascent past Klein Hangklip, as the R44 descends towards Pringle Bay alongside the Koegelberg range. It is therefore very visible from the R44, which is a designated scenic route. It would impact very obviously on the start of the visual experience of all those driving along that road.	The farm consists of only one suitable place to develop and that is on a previously developed footprint and a new footprint determined in the NEMA process. Various smallholding exists outside the urban edge, some has been development and other still need to be developed its inevitable. The farm is very visible indeed but the selected site is below the viewshed with very sporadic and limited views when driving on the R 44. The road users driving south is the only receptor likely to see the buildings, but these road users will be traveling through the urban Rooiels with houses against the mountain slopes, houses perched on the ridgeline, the subject site is hidden compared to completely exposed buildings between Rooiels and Pringle Bay. This development will not be a new or extraordinary negative experience to the receptor.
The applicants acknowledge that the Provincial SDF emphasizes the importance of conserving provincial scenic resources and that this site is on an important scenic corridor, but putting a 30x15m motor showroom into a view cannot but make the scene one of a showroom, not one of the scenic corridor.	The "show room" is an outbuilding garage used for a private vehicle collection. This building is hidden from most view angles behind various viewsheds and the deep R44 road cutting. Two view frames from the R44 over a very short distance make the building visible for a few seconds only, this will not deteriorate the important scenic corridor. If visual mitigation is applied the likely impacts will be reduced to low.

The proposal purports that not developing the rest of the plot preserves it. But they are not allowed to develop the rest of the site in any event. And this aggressive siting of a totally unsuitable building is all that would draw the eye. If it is to avoid further detracting from the existing conservation area and impacting on both the biosphere and the adjacent reserve the proposal should be amended so that it lies within the previous building footprint and height.	Development is subject to an application process in order to obtain rights. A landowner does have the right to apply. The node 1 sitting is not aggressive, it's on a previously disturbed and scientifically informed footprint. The development of node 2 is due to a personal private need of the owners, hence the decision to purchase a smallholding. The site was scientifically selected partly on the old R44, mostly hidden from the R 44 therefore not aggressive either. The buildings will be 8 m high as per allowance.
It is clear from the submission/ proposal, that the crucially important and required visual impact assessment has not been done or provided. We are convinced that such study would demonstrate an inappropriate visual impact of the proposal.	The VIA was conducted, it was found that the buildings are sporadically visible in limited view corridors. It's located below the watershed, considering contour levels the highest part of the node 1 building will not stand above the watershed, the roof of the node 2 building should be level with the watershed hight, the roof will be charcoal the walls with be earth tones, if anything stands out it will be very limited, it will have colour mitigation plus it will still be against the backdrop of the Kogelberg mountains, that will absorb the limited impact.
Concerned about the incremental erosion of title deed condition and land use legislation, leading to a loss of the sense of place, character and special environmental quality of the village of Rooiels and its surrounds.	The VIA only deals with the visual impact on potential receptors and in this case the impacts will be of low significance after mitigation. Any owner of a smallholding between Rooiels and Pringle Bay can develop a dwelling within their zoning parameters and if that building is visually exposed, on the ridgeline or against the mountain slope no controls will apply because it's the owners' rights. In this case the owner has a motivation for the garage building to be used to keep his private collection of vehicles, the owner ais following a NEMA process and have conducted various specialist studies that proposed site selection and mitigating measures. This VIA determined that the development will not contribute to the loss in sense of place, character and special environmental quality of the area in general. This development will likely have a better nett output considering all the mitigations compared to buildings that is developed within the context of primary rights against the slope or on the ridgeline where no assessment has been conducted.

This assessment was based on criteria whereby view corridor and possible receptors inside this corridor was identified and assessed. The outcome was that the site is sporadically visible and due to topography mostly hidden. At some pinch points the buildings will be seen but it will be while driving at 60-80 km/h in a southerly direction, therefore only visible for a few seconds. The site is below the watershed/viewshed and considering the contour lines, node 1 will be below this after construction, node 2 is below it as well and considering the roof height of 8m it should end up in line with the watershed heigh and R 44 berm height, therefore it's highly likely not visible from the south and west. If anything stands out so slightly it will be minimal, it will be horizontal not vertical, it will be charcoal-coloured roofs with earthy tone walls, with the Kogelberg as backdrop. Distant views from a small section of Rooiels is regarded as negligible due to the VAC of the site. Considering the site context in relation to other developments on smallholdings the proposed will not change the visual landscape or the area's character. It is important that the mitigating measures be adopted in the recommendations of the BAR, to be carried over into the Environmental Authorisation and building plan approvals.

8. REFERENCES

Oberholzer, B. 2005. *Guideline for involving visual & aesthetic specialists in EIA processes: Edition 1.* CSIR Report No ENV-S-C 2005 053 F. Republic of South Africa, Provincial Government of the Western Cape, Department of Environmental Affairs & Development Planning.

PHS CONSULTING
environmental, land-use, eco-tourism planning and management.

8 September 2025

ADDENDUM LETTER - VISUAL IMPACT ASSESSMENT (VIA) DATE OCTOBER 2023

PROPOSED EXPANSION OF AN EXISTING RESIDENTIAL DWELLING ON PORTION 134 OF THE FARM 599; ROOIELS

Background

The proposed development entails the expansion of the approved residential dwelling on Portion 134 of Farm 559, to include an additional garage. In 2023/2024, a Basic Assessment process and an October 2023 VIA was concluded for the proposed development of a residential dwelling and a garage on two separate development footprints within the property. In April 2024, Environmental Authorisation was granted (DEADP Ref. 16/3/3/1/E2/33/1059/23) for the development of the residential dwelling on Node 1 as per Oct 2023 VIA. The proposed garage, located on a separate development footprint labelled Node 2 in the Oct 2023 VIA, was not authorised as part of the EA.

The applicant now proposes to expand the approved residential dwelling on Node 1 by adding a new garage with a building footprint of approximately 328m^2, located entirely within the EA approved development footprint. No additional indigenous vegetation clearance or expansion of the disturbed area is required. The proposed garage will accommodate the owner's everyday vehicles, serve as private storage for the owner's collection of vintage cars and motorcycles, and house equipment required for on-site rehabilitation, conservation, and fire protection activities. The total development footprint of all buildings with the inclusion of the new garage will be 808m² inside the EA approved 1155m², referred to as Node 1 in the Oct 2023 VIA.

Paul Slabbert, the VIA specialist who completed the October 2023 VIA, was requested to confirm whether the findings and impact ratings in the report remain unchanged, or, if any changes in ratings are anticipated, whether these would materially affect the October 2023 VIA and necessitate an amendment to the report.

West Elevation Comparisons

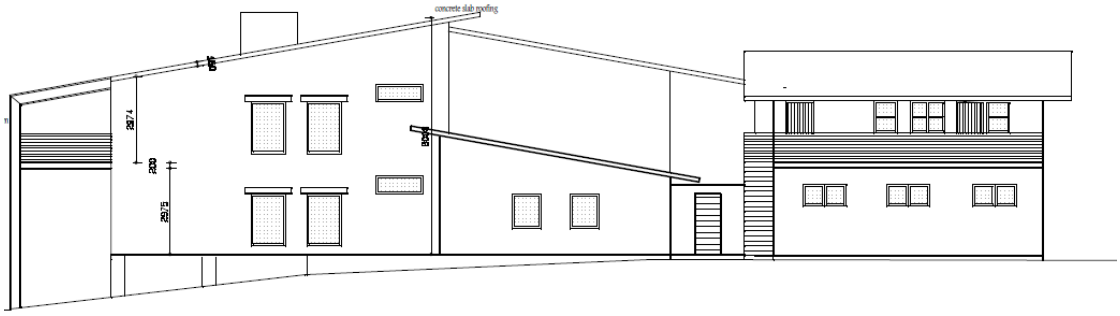

Figure 1: West elevation, Oct 2023 VIA assessed

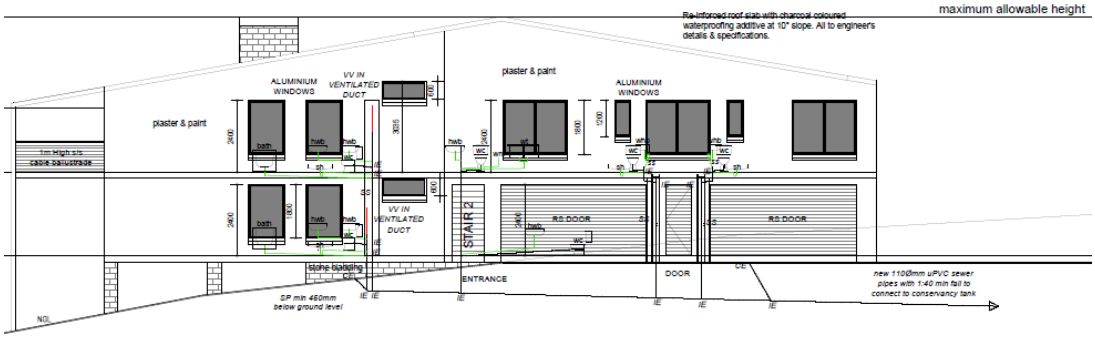

Figure 2: 2024 Municipal Approved Main dwelling, being constructed

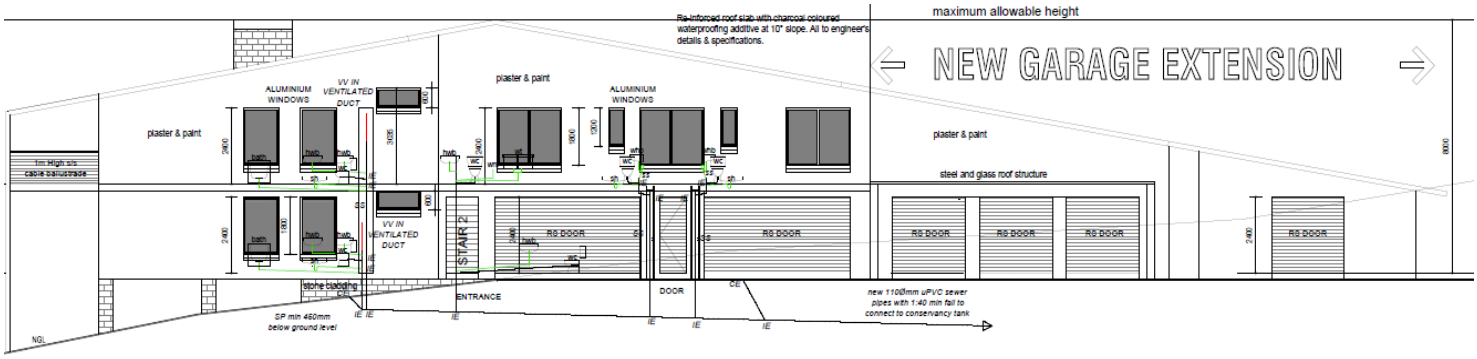

Figure 3: Municipal Approved Main dwelling with New proposed garage extension

North Elevation Comparisons

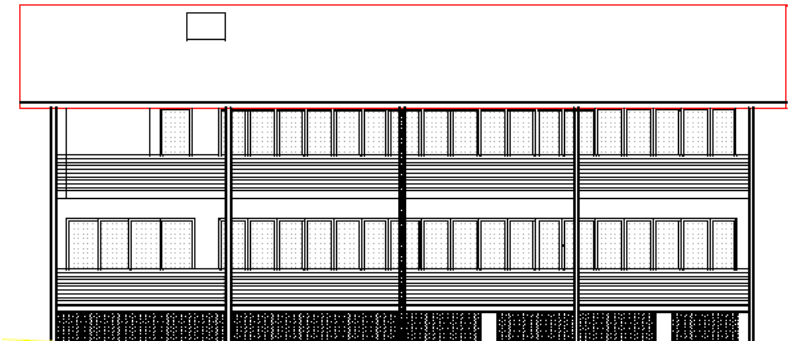

Figure 4: North elevation, Oct 2023 VIA assessed

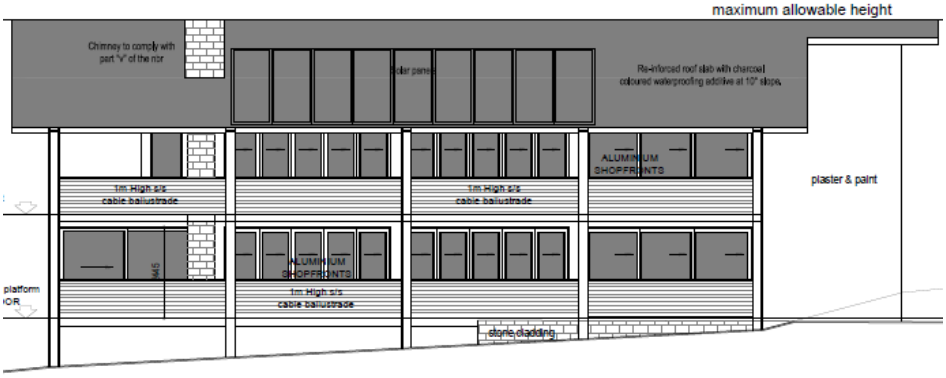

Figure 5: 2024 Municipal Approved Main dwelling, being constructed

Figure 6: Municipal Approved Main dwelling with New proposed garage extension (indicated by red block outline)

Discussion & Conclusion

After evaluation of the proposal and the Oct 2023 VIA, it can be concluded that:

- Node 2 is no longer applicable therefore all aspects in the VIA that refer to Node 2 can be disregarded.
- Development on Node 1 was approved and the extent of the VIA assessment dealt with the entire 1155 m² Node 1 footprint as per figure 1 in the Oct 2023 VIA.
- The proposed expansion is proposed within the same footprint previously assessed.
- It was understood that development on Node 2 was initially opposed from a visual perspective considering it was not previously developed. Therefore, with this node no longer applicable the visual sensitivities are less and the expected impact is reduced.
- Development on Node 1 was established pre a devastating fire, therefore the development is not new, this node is also located below the watershed therefore below the viewshed.
- The Oct 2023 VIA determined that the approved development with a maximum roof heigh of 8m will be acceptable, considering all the assessment criteria.
- The expansion proposed will have a roof height of less than 8m, therefore it is lower than the approved house and slightly hidden and it will not protrude above the assessed maximum building heights of 8m.
- The site context remains the same as per Oct 2023 VIA.
- Since the proposed expansion is inside the footprint of Node 1 and that the building is lower and behind the approved building, the findings and recommendations of the Oct 2023 VIA pertaining to Node 1, remain the same.
- There is no need to reassess the new proposed expansion.

Kind regards,

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