October 2026

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Document Version: Application Phase (in-process)

DRAFT BASIC ASSESSMENT REPORT

PROPOSED RESIDENTIAL DEVELOPMENT ON ERF 134, INFANTA.



EAP Responsible for the application:

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BASIC ASSESSMENT REPORT

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

OCTOBER 2026

(For official use only)	
Pre-application Reference Number (if applicable):	***16/3/3/6/7/1/E3/6/1456/25***
EIA Application Reference Number:	***16/3/3/1/E3/6/1086/26***
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

GENERAL PROJECT DESCRIPTION

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

PROPOSED RESIDENTIAL DEVELOPMENT ON A PORTION OF ERF 134, INFANTA, WESTERN CAPE.

The proposal entails the rezoning and subdivision of a 3.89ha portion of Erf 134, Infanta, from Agricultural Zone to Subdivisional Area under section 15(2) of the Swellendam Municipal By-law on Land Use Planning, 2020. The proposed zonings are Residential Zone 1, Public and Private Open Space, Natural Environment Zone, Utility Zone, Transport Zone 1 (Private Road) and Transport Zone 2 (Provincial/Public Road). The site falls within Infanta's urban edge and is identified for residential expansion.

The development comprises 20 new freestanding dwellings (15 single-storey and five double-storey), bringing the total to 21 including the existing dwelling. Properties will be sold under freehold title, with a Homeowners' Association responsible for management and compliance with the approved Architectural and Landscaping Guidelines. The preferred layout incorporates specialist recommendations, environmental constraints and comments from earlier public participation.

Approximately 1.1ha (28%) will be zoned Natural Environment Zone, including botanically sensitive areas and a 40m ecological corridor centred on the ephemeral drainage line. An approximately 8m landscaped strip is proposed along the Western boundary. Approximately 3 439m² along the coastal edge will be zoned Public Open Space and will accommodate a raised, wheelchair-accessible walkway approximately 2m wide and 195m long (approximately 390m²). Permanent development will remain landward of the site-specific coastal development setback line.

Water will be supplied from existing borehole BH134C through an approximately 1 090m-long, 125mm-diameter pipeline and a proposed 140m³ reservoir with a footprint of approximately 144m². Each new dwelling will have a 5m³ rainwater tank and an individual wastewater-package plant (approximately 2.42m² per unit; 48.4 m² combined), with treated effluent discharged to a soakaway. The existing dwelling will retain its septic tank. Electricity will be supplied from Eskom's existing 22kV network following a transformer upgrade. Access will use the existing Erf 134 entrance from MR268 and a secondary entrance from Hoek Street. Internal private roads will be approximately 4.5m wide within 8m road reserves.

Note: *The proposal was circulated for pre-application comment from 13 November to 12 December 2025. This second Draft BAR and in-application public participation process incorporates subsequent layout changes, specialist input and I&AP comments.*

IMPORTANT INFORMATION TO BE READ PRIOR TO COMPLETING THIS BASIC ASSESSMENT REPORT

1. **The purpose** of this template is to provide a format for the Basic Assessment report as set out in Appendix 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in order to ultimately obtain Environmental Authorisation.

2. The Environmental Impact Assessment ("EIA") Regulations is defined in terms of Chapter 5 of the National Environmental Management Act, 19998 (Act No. 107 of 1998) ("NEMA") hereinafter referred to as the "NEMA EIA Regulations".

3. Submission of documentation, reports and other correspondence:

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

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

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

   DEADPEIAAdmin.George@westerncape.gov.za
   Directorate: Development Management (Region 3):
   Garden Route District Municipal area and Central Karoo District Municipal area

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

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

4. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.

5. All applicable sections of this BAR must be completed.

6. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.

7. This BAR is current as of **April 2024**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at http://www.westerncape.gov.za to check for the latest version of this BAR.

8. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an environmental authorisation in terms of the NEMA EIA Regulations when the Western Cape Government Department of Environmental Affairs and Development Planning ("DEA&DP") is the Competent Authority.

9. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be

provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.

10. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.

11. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.

12. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"), the "One Environmental System" is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department's Circular EADP 0028/2014: One Environmental Management System.

13. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA") is triggered, a copy of Heritage Western Cape's final comment must be attached to the BAR.

14. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link https://screening.environment.gov.za/screeningtool to generate the Screening Tool Report. The screening tool report must be attached to this BAR.

15. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA"), the submission of the Report must also be made as follows, for-

    Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

    Atmospheric Emissions Licence Applications, this report must also be (i.e., another hard copy and electronic copy) submitted for the attention of the Licensing Authority or this Department's Air Quality Management Directorate (Tel: 021 483 2888 and Fax: 021 483 4368) at the same postal address as the Cape Town Office.

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

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	

Site Plan:	Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following:
	• The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale.
	• The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan.
	• On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided.
	• The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan.
	• The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan.
	• Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development **must** be clearly indicated on the site plan.
	• Servitudes and an indication of the purpose of each servitude must be indicated on the site plan.
	• Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to):
	  o Watercourses / Rivers / Wetlands
	  o Flood lines (i.e., 1:100 year, 1:50 year and 1:10 year where applicable);

	○ Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): ○ Ridges; ○ Cultural and historical features/landscapes; ○ Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as **Appendix C**. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as **Appendix D**.
Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as **Appendix A3**.

ACRONYMS

DFFE:	Department of Forestry, Fisheries and Environment
DEA:	Department of Environmental Affairs
DEA&DP:	Department of Environmental Affairs and Development Planning
DHS:	Department of Human Settlement
DoA:	Department of Agriculture
DoH:	Department of Health
DWS:	Department of Water and Sanitation
EMPr:	Environmental Management Programme
HWC:	Heritage Western Cape
NFEPA:	National Freshwater Ecosystem Protection Assessment
NSBA:	National Spatial Biodiversity Assessment
TOR:	Terms of Reference
WCBSP:	Western Cape Biodiversity Spatial Plan
WCG:	Western Cape Government

ATTACHMENTS

Note: The Appendices must be attached to the BAR as per the list below. Please use a ✓ **(**tick) or a **x** (cross) to indicate whether the Appendix is attached to the BAR. The following checklist of attachments must be completed.

APPENDIX			**✓ (Tick) or x (cross)**
Appendix A:	**Maps**		
	Appendix A1:	Locality Plan	✓
	Appendix A3:	100m Coordinate Map: Bulk Water Pipeline	✓
Appendix B:	**Appendix B1:**	Site Development Plan (Alternative 1)	✓
	Appendix B2:	Site Development Plan (Alternative 2)	✓
	Appendix B3:	Site Development Plan (Alternative 3)	✓
	Appendix B4A:	Site Development Plan (Alternative 4 - Preferred)	✓
	Appendix B4B:	Borehole, Reservoir & Pipeline Layout (Preferred)	✓
	Appendix B4C:	Walkway Design (Preferred)	✓
Appendix C:	**Photo Report**		✓
Appendix D1:	**Biodiversity Overlay Map**		✓
Appendix D2:	**Site Sensitivity Overlay SDP**		✓
Appendix E:	**Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.**		
	Appendix E1A:	HWC letter 1 (2 December 2010)	✓
	Appendix E1B:	HWC letter 2 (13 June & 12 December 2012)	✓
	Appendix E1C:	HWC letter 3 (21 April 2017)	✓
	Appendix E1D:	HWC letter 4 (9 March 2026)	✓
	Appendix E2:	Road's Authority letters (11 & 12 August 2015)	✓
	Appendix E3:	Eskom Capacity Confirmation letter (26 August 2026)	✓
	Appendix E4:	Solid Waste Management letters (18 & 28 September 2020)	✓
	Appendix E5:	Department of Agriculture Letter (28 May 2026)	✓
Appendix F:	**Appendix F1:**	Details on PPP completed (Pre-Application PPP proof)	✓
	Appendix F2:	Comments and Responses Report & Appendices	✓
Appendix G:	**Appendix G1:**	Architectural Guidelines & Landscape Plan (2026)	✓
	Appendix G2:	Hydrogeological Report (2026)	✓
	Appendix G3:	Civil Engineering Services Report	✓
	Appendix G4:	Electrical Engineering Report	✓
	Appendix G5:	Risk Assessment of Septic Tanks and Soakaway	✓
	Appendix G6:	Planning Motivation Report & Appendices (2026)	✓
	Appendix G7A:	Setback Line Assessment (2012)	✓
	Appendix G7B:	Setback Line Letter (2024)	✓
	Appendix G7C:	Latest Setback Line Assessment (2026)	✓
	Appendix G8:	Freshwater Impact Assessment (2024)	✓
	Appendix G9A:	Botanical Impact Assessment (2017-2023)	✓
	Appendix G9B:	Latest Botanical Impact Assessment (2026)	✓
	Appendix G10:	Faunal Compliance Statement (2024)	✓
	Appendix G11A:	Heritage Statement (2010)	✓
	Appendix G11B:	Heritage Specialist Letter (2024)	✓
	Appendix G12:	Archaeological Assessment & Radiocarbon Dating (2010-2012)	✓
	Appendix G13A:	Social Impact Assessment (2015)	✓
	Appendix G13B:	Social Impact Assessment Addendum Letter (2021)	✓
	Appendix G13C:	SIA Impact Assessment Tables	✓

	Appendix G14A:	Traffic Impact Statement (2019)	✓
	Appendix G14B:	Traffic Impact Assessment Addendum Letter (2023)	✓
	Appendix G15:	Geohydrological Study (2007)	✓
Appendix H:	**EMPr & Appendices**		✓
Appendix I:	**Screening Tool Report (dated 2025 & 2021)**		✓
Appendix J:	**Impact Assessment Tables**		✓
Appendix K:	**Site Sensitivity Verification Report (dated September 2026)**		✓
Appendix L:	**CV of Environmental Assessment Practitioners**		✓
Appendix M:	**WULA Technical Report inclusive of Application Status & Appendices**		✓
Appendix N:	**Historical Photos & Infrastructure Timeline**		✓

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	**CAPE TOWN OFFICE: REGION 1**		~~GEORGE OFFICE: REGION 3~~	
	~~(City of Cape Town, West Coast District~~	**(Cape Winelands District & Overberg District)**	~~(Central Karoo District & Garden Route District)~~	
Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	Westerhelling Investments CC			
Name of contact person for Applicant/Proponent (if other):	Mark de Agrella			
Company/ Trading name/State Department/Organ of State:	Westerhelling Investments CC			
Company Registration Number:	Ck 89/07271/23			
Postal address:	P.O. Box 10071, The Falls, Northmead, Benoni			
	Benoni		Postal code:	1522
Telephone:	27(0) 11 425 2420		Cell:	27(0) 82 717 9249
E-mail:	jarjininv@gmail.com		Fax:	N/A
Company of EAP:	PHS Consulting			
EAP name:	Amanda Fritz-Whyte André-Pierre Gouws			
Postal address:	P.O. Box 1752, Hermanus			
			Postal code:	7200
Telephone:	27(0) 28 312 1734		Cell:	27(0) 82 327 2100 / 27(0) 82 523 1550
E-mail:	amanda@phsconsulting.co.za / ap@phsconsulting.co.za		Fax:	27(0) 86 508 3249
Qualifications:	Amanda Fritz-Whyte: BSc; BSc (Hons) Geology; MSc Water Resource Management IAIAsa, Pri.Sci.Nat (118385), WISA fellow André-Pierre Gouws: BA (Hons) Geography & Environmental Studies			
EAP registration no:	Amanda Fritz-Whyte: 2019/367 André-Pierre Gouws: 2023/6365			
Duplicate this section where there is more than one landowner Name of landowner:	Westerhelling Investments CC			
Name of contact person for landowner (if other):	Mark de Agrella			
Postal address:	P.O. Box 10071, The Falls, Northmead, Benoni			
	Benoni		Postal code:	1522
Telephone:	27(0) 11 425 2420		Cell:	27(0) 82 717 9249
E-mail:	jarjininv@gmail.com		Fax:	N/A
Name of Person in control of the land:	Westerhelling Investments CC			
Name of contact person for person in control of the land:	Mark de Agrella			
Postal address:	P.O. Box 10071, The Falls, Northmead, Benoni			
	Benoni		Postal code:	1522
Telephone:	27(0) 11 425 2420		Cell:	27(0) 82 717 9249
E-mail:	jarjininv@gmail.com		Fax:	N/A

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	Swellendam Municipality		
Contact person:	Ron Brunings		
Postal address:	P.O. Box 20, Swellendam		
	Swellendam	Postal code:	6740
Telephone	27(0) 28 514 1100	Cell:	27(0) 84 402 7715
E-mail:	rbrunings@swellendam.gov.za	Fax:	27(0) 28 514 2458

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

1.	Is the proposed development (please tick):	**New**	**X**	~~Expansion~~	N/A
2.	Is the proposed site(s) a brownfield or greenfield site? Please explain.				
The proposed site is a greenfield site (consists of natural vegetation and an ephemeral drainage line) with an existing house, existing secondary infrastructure and an existing gravel access road off MR268.					
3.	**For Linear activities or developments**				
3.1.	Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:				
Erf 134, Infanta, Western Cape.					
3.2.	Development footprint of the proposed development for all alternatives.				

Coastal Walkway: ±390m² (195m x 2m)

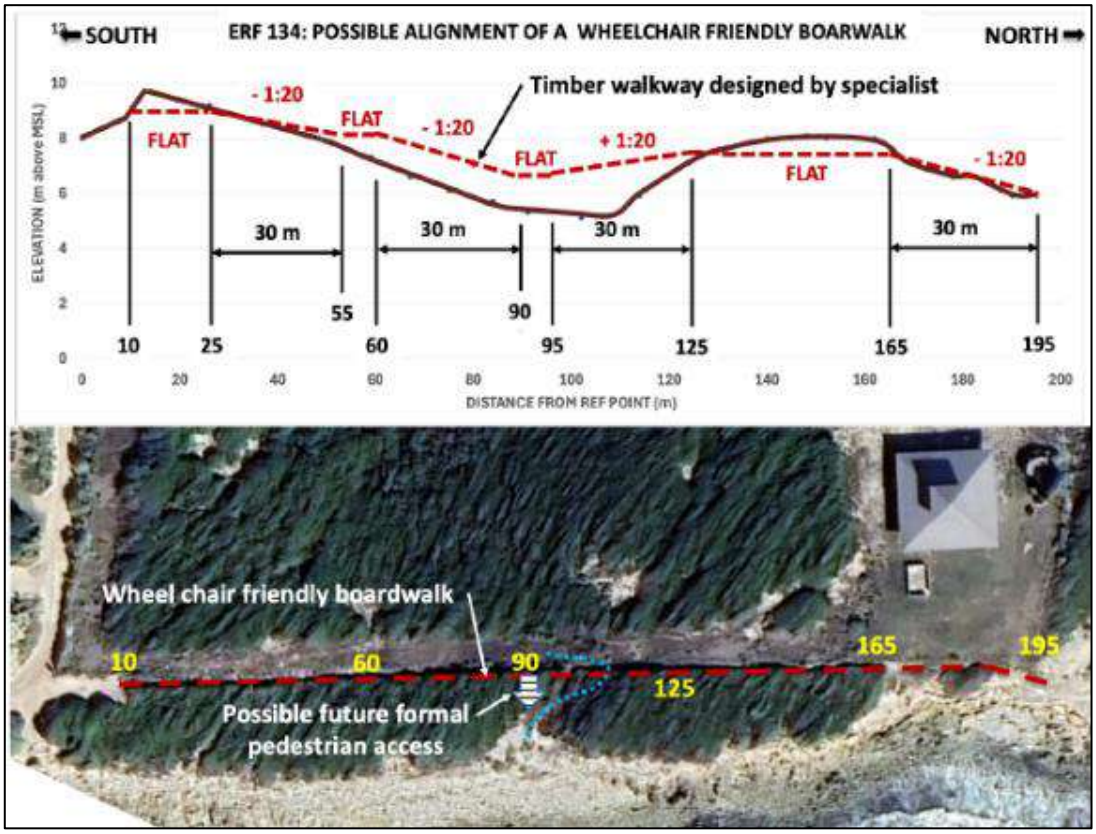


Figure 1: Proposed wheel-chair friendly coastal walkway alignment (Specialist Coastal Engineering and Setback Line Assessment, 2026, Laurie Barwell – Laurie Barwell & Associates)

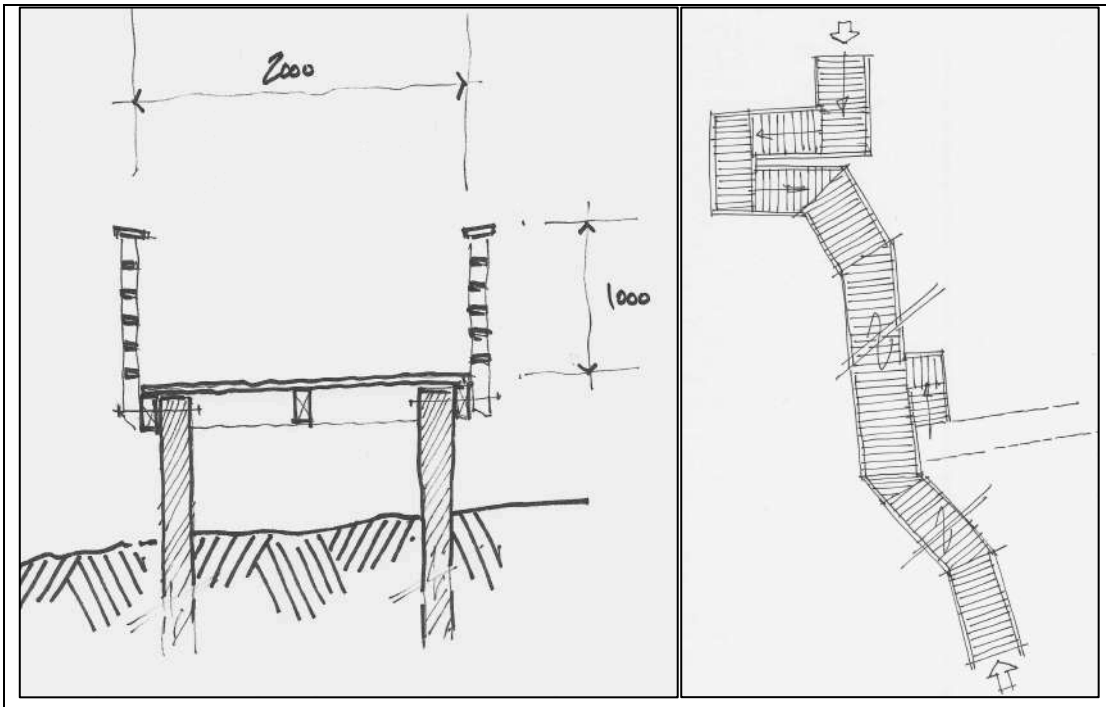


Figure 2: Proposed wheelchair-friendly walkway concept sketch (Gosztola Architects, 2026).

Bulk Potable Water Pipeline: ±828.4m² (1090m x 760mm)

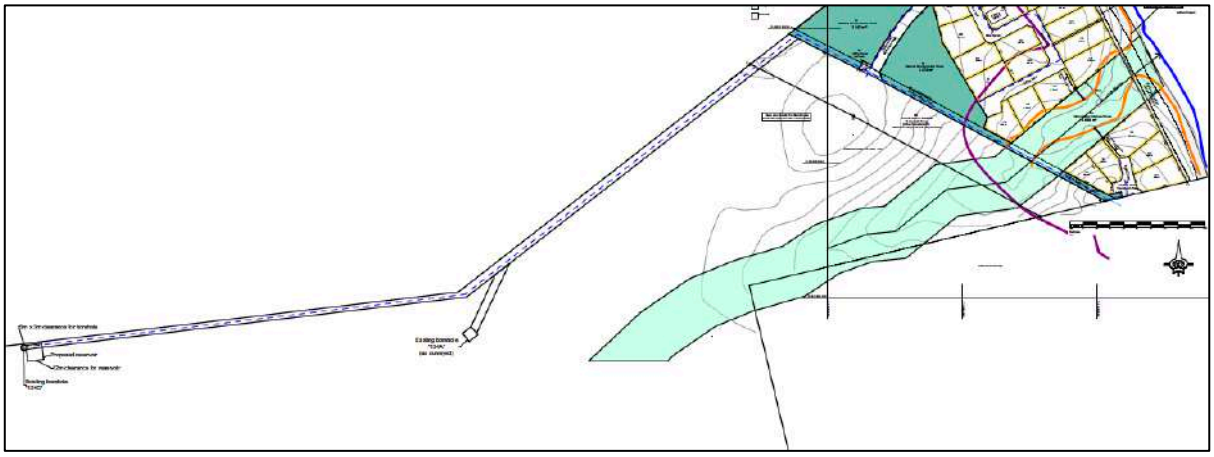


Figure 3: Extract of Preferred Alternative 4 associated with location of borehole BH134C, the proposed reservoir and bulk potable-water pipeline alignment (**Appendix B4B**).

3.3.	Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.

Coastal Walkway: A 2m-wide and approximately 195m-long raised, wheelchair-accessible coastal walkway on stilts, is proposed with an estimated footprint of approximately 390m².

Bulk Potable Water Pipeline: An approximately 1 090m-long bulk potable-water pipeline with a diameter of 125mm is proposed. Based on a temporary trenching width of approximately 760mm, the pipeline installation will result in a maximum temporary disturbance footprint of approximately 828.4m² (±0.083ha). The proposed alignment follows an existing disturbed boundary/access corridor and therefore represents the preferred alignment from a biodiversity perspective. A 6m pipeline and right-of-way servitude will be registered for the pipeline route. The servitude area does not represent the physical construction disturbance footprint.

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

Coastal Walkway: Access to the coastal walkway will be obtained from the existing access road off MR268, together with a secondary access from Hoek Street.

Bulk Potable Water Pipeline: Access to the bulk potable water pipeline will be obtained from MR268 via an existing disturbed boundary/access corridor on Erf 134, South of Infanta Park.

3.5.	SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives		Erf 134, Infanta, Western Cape: C07300040000013400000	
3.6.	**Starting point co-ordinates for all alternatives (i.e. Coastal Walkway)**			
	Latitude (S)	**34º**	**25′**	**04.88″**
	Longitude (E)	**20º**	**51′**	**14.37″**
	Middle point co-ordinates for all alternatives (i.e. Coastal Walkway)			
	Latitude (S)	**34º**	**25′**	**07.69″**
	Longitude (E)	**20º**	**51′**	**16.13″**
	End point co-ordinates for all alternatives (i.e. Coastal Walkway)			
	Latitude (S)	**34º**	**25′**	**10.49″**
	Longitude (E)	**20º**	**51′**	**17.90″**
3.7.	**Starting point co-ordinates for all alternatives (i.e. Bulk Potable Water Pipeline)**			
	Latitude (S)	**34º**	**25′**	**14.88″**
	Longitude (E)	**20º**	**50′**	**40.34″**
	Middle point co-ordinates for all alternatives (i.e. Bulk Potable Water Pipeline)			
	Latitude (S)	**34º**	**25′**	**11.57″**
	Longitude (E)	**20º**	**50′**	**59.29″**
	End point co-ordinates for all alternatives (i.e. Bulk Potable Water Pipeline)			
	Latitude (S)	**34º**	**25′**	**10.85″**
	Longitude (E)	**20º**	**51′**	**15.75″**

Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as **Appendix A3.**

4.	**Other developments**	
4.1.	Property size(s) of all proposed site(s):	**Erf 134:** ±856 000m^2 **Residential Development Site (East of MR268):** ±38 896m^2 (subdivided portion of Erf 134 proposed for residential development) **Reservoir & Pipeline (West & East of MR268):** ±972.4m^2
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):	**Existing house:** ±385m^2 **Garage:** ±200m^2 **Store:** ±20m^2 **Braai area:** ±15m^2 **Grave site:** ±4m^2 **Water reservoir:** ±30m^2 **Barn:** ±500m^2 **Borehole BH134C:** ±9m^2 **Existing access:** ±330m^2 **Total footprint:** ±1 493m^2 (0.1493ha).
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:	**Private Roads:** ±2903m^2 **Provincial Roads:** ±8334m^2 **Residential Units:** ±13 377m^2 **Coastal Walkway:** ±390m^2 **Bulk Pipeline:** ±828.4m^2 **Conservation:** ±10 758m^2 **Refuse Area:** ±40m^2 **Reservoir:** ±144m^2 **Package Plants (20):** ±48.4m^2
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).	

The proposal entails the rezoning and subdivision of an approximately 3.89ha portion of Erf 134 (85.6ha), Infanta, to facilitate a residential development. The portion will be rezoned from Agricultural Zone (AZ) to Subdivisional Area, comprising Residential Zone 1 (RZ1), Public Open Space (POS), Private Open Space (PrOS), Natural Environment Zone (NEZ), Utility Zone (UZ), Transport Zone 1 (TZ1 – Private Road) and Transport Zone 2 (TZ2 – Provincial/Public Road). The application is made in terms of section 15(2) of the Swellendam Municipal By-law on Land Use Planning, 2020, read with section 3 of the Swellendam Municipality Integrated Zoning Scheme, June 2020, and will permit the development of 20 additional single residential dwellings in accordance with the proposed layout plan.

For purposes of this application, the approximately 3.89ha development portion will hereafter be referred to as "the site". The existing borehole, as well as the proposed reservoir and associated bulk potable-water pipeline, located on or traversing the Western portion of Erf 134, will be secured through the registration of the necessary servitudes. The remainder of Erf 134, comprising approximately 81.7ha and situated predominantly West of Infanta Main Road 268, will retain its agricultural zoning and does not form part of the proposed rezoning and subdivision application.

The areas are to be rezoned as follows:

Proposed Zoning	Area (m²)	Percentage of Developable Area	Portion number for reference as per SDP (Appendix B4A)
Residential Zone 1	13 377m²	34,3917%	1-21
Public Open Space	3 439m²	8,8415%	22
Private Open Space	48m²	0,1234%	25
Natural Environment Zone	10 758m²	27,6584%	23 & 24
Utility Zone	37m²	0,0951%	26
Transport Zone 1 – Private Roads	2 903m²	7,4635%	27 & 28
Transport Zone 2 – Provincial / Public Roads	8 334m²	21,4264%	29
Total	**38 896m²** (3.89ha)	**100%**	

The site is located within the demarcated urban edge of Infanta and has been earmarked for urban expansion, residential development in particular. Registration of various servitude areas include:

1) 2m servitude area around existing borehole on Westerly section of Erf 134
2) Reservoir servitude on Westerly section of Erf 134
3) 6m servitude for pipeline and right of way along pipeline route on the Westerly section of Erf 134.
4) 1m wide public access to walkway in middle of site to enable formal access to the coastline
5) 2m Stormwater servitude area on both sides of the drainage line.

There is an existing 7,87m servitude right of way along the Eastern border of the site. This servitude is in favor of Erf 107 and Erf 201 and includes the walkway. All these servitude areas are indicated on the SDP contained in **Appendix B4A.**

PROPOSAL

It is proposed to subdivide the site into 21 separate residential erven (twenty vacant erven for new dwellings and an erf for the existing house). Erf sizes vary between 500m² and 1582m², with fourteen of the plots larger than 550m², and six larger than 630m². The gross density of the land to be rezoned will be 5,4 units per hectare. This compares very favourably with the existing patterns of development in Infanta. 15 units will be single storey and 5 will be double storey. The existing dwelling, braai place and grave on site, will remain. The existing waste collection room/ storage room and garage will be removed, as they fall on new erven. Refer to Figure 4 and Figure 5.



Figure 4: Existing Dwelling and garage in the background. Note grave in foreground (PHS, 2025).



Figure 5: Existing Braai area on Northern perimeter fence of site (PHS, 2025)

The 20 erven will be sold off under freehold, and a Homeowners Association will be established to regulate the development of the entire property in accordance with a set of approved Design Guidelines. All building plans submitted to the local planning authority will have to comply with the approved Design Guidelines and must be endorsed by the Homeowners Association.

The proposed development has been informed by a set of Design Guidelines (**Appendix G1**), which include, but are not limited to, the following:

• **Coverage and Building Footprint**

Coverage will be 50% of the site area of each specific erf. This means that 6 688.5m² or 17% of the entire 3.89ha site will be set aside for potential building footprints.

• **Building Form & Shape**

The Design Guidelines present various examples of the desired building form. Refer to Figure 6.

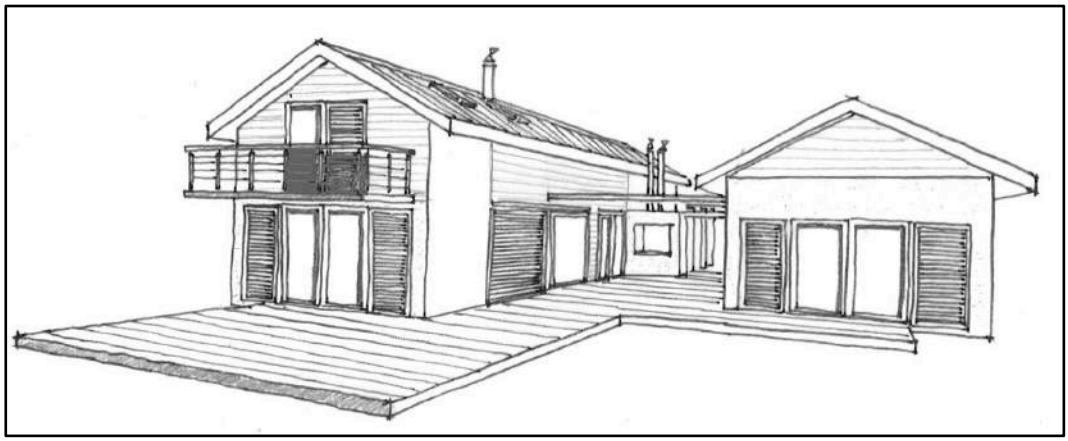


Figure 6: An example of the contemporary coastal architecture proposed (Gosztola Architects, 2025).

THE PROPOSED VEHICULAR ACCESS POINTS TO THE SITE & INTERNAL ROAD SYSTEM

Access to the development will be obtained off the existing Infanta Main Road (MR268) which transects Erf 134. This road (MR268) will be rezoned to Transport Zone 2 (Provincial Road / Public Road) and ownership of this land will be transferred to the provincial roads authority. Two access roads are proposed: the existing access to Erf 134 off MR268 will be retained, as well as a newly proposed access road off Hoek Street to provide access to the proposed five (5) erven located in the Southern sector of the applicant property. The exact positioning of the two access entry points has been informed by the specialist traffic consultants. The access road as well as the internal road network will consist of 4,5m wide road surfaces (8m wide road reserve). The development includes three internal streets. Street 1 (existing access road off MR268) will be approximately 242.49m long, with a footprint of approximately 1 939.92m²; Street 2 will be approximately 46.42m long, with a footprint of approximately 371.36m²; and Street 3 (proposed access off Hoek Street) will be approximately 31.76m long, with a footprint of approximately 254.08m².

THE PROPOSED OPEN SPACE SYSTEM

Two large areas will be set aside as open spaces or natural environmental zones. The area of high botanical conservation importance, comprising intact vegetation and Species of Conservation Concern (approximately 6 615m²) adjacent to the existing access from MR268,

together with the 40m ecological buffer associated with the drainage line (approximately 4 650m²), will be zoned Natural Environment Zone. Furthermore, approximately 3 439m² along the coastal edge of the property (East) will be zoned Public Open Space (POS). A public right-of-way servitude will also be registered over a portion of this land. The combined area of 14 197m² represents 36.5% of the entire developable area. While pedestrian access to these areas will be possible, such access will be limited and controlled due to conservation considerations. The protected areas will be clearly demarcated as "no-go" areas.

THE PUBLIC COASTAL WALKWAY

It is proposed to create a public walkway along the Eastern edge of the residential erven within the Public Open Space zone. This walkway will provide safe and defined public pedestrian access along the coastline. Construction of the walkway will be undertaken by the developer, and the maintenance of the walkway will be the responsibility of the Homeowner's Association. The proposed wheelchair-friendly public coastal walkway (on stilts) will be approximately 2m wide and 195m in length. Refer Figures 1 & 2 above.

FLOODLINES

For additional safety, the houses close to the watercourse should be built with floor levels at an elevation to allow a freeboard of at least 400mm above the 100-year flood line levels (which have been determined for the site).

WATER DEMAND AND SUPPLY

The estimated Annual Average Daily Demand (AADD) for the development is as follows:

21 Single Residential Erven (small) - 800 ℓ/unit/day 16,8 kℓ/day

Total AADD 16,8 kℓ/day or 0,194 ℓ/s

It is proposed to supply water from a dual source of both rainwater and borehole water.

Rainwater Supply

With the expected Mean Annual Precipitation (MAP) of 430mm/year, an average roof size of 215m² and 80% efficiency rate the expected annual rainwater harvesting per unit will be around 74m^3/household/annum. It is proposed that the harvesting of rainwater be used for potable water consumption. Each household will be required to have a 5m^3 water tank for rainwater harvesting. Roof runoff will first enter the tank, which will capture and temporarily attenuate the initial runoff. Once the tank is full, its overflow will discharge into an underground soakaway, allowing the water to infiltrate into the ground.

Borehole Water Supply

A 72-hour pumping test on borehole 134C (Van Biljon, 2014) confirmed a sustainable yield of 25m³/day, with a maximum of 48m³/day under optimal conditions. This yield exceeds the development's estimated potable demand of 16.8m³/day (±6,132m³/a). Including provision for firefighting, the total annual water demand is estimated at 7,665m³/a (21m^3/day).

Borehole BH134C at the site was tested in June 2020 with a 48-hour pumping program, including a Stepped Discharge Test, Constant Discharge Test, and Recovery Monitoring, to assess its productivity and aquifer properties. The tests determined the sustainable yield, calculated using the FC-Method, at 32.4m³/day (11,826m³/year). Water quality analysis showed elevated salinity (Na, Cl, EC, TDS) typical of the Bokkeveld Group and total coliforms above operational limits, indicating microbial contamination from soil. The borehole can supply sufficient water for the development but requires treatment for potable use.

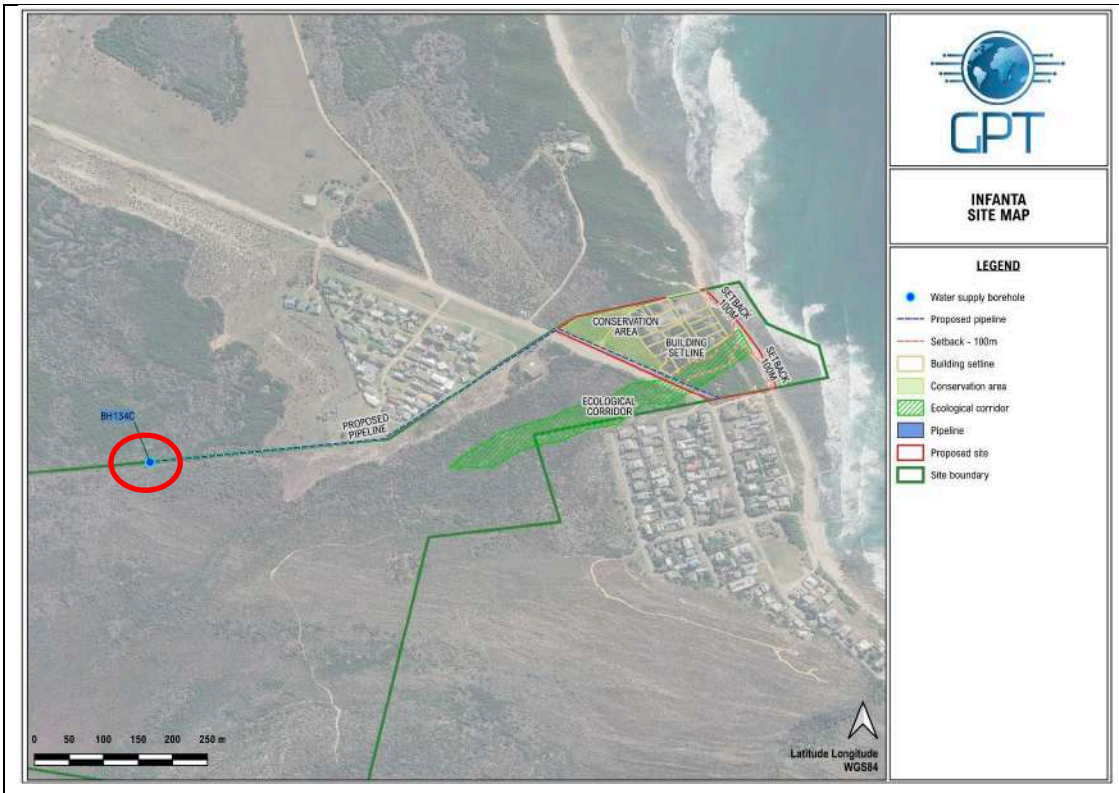


Figure 7: Borehole 134C on Erf 134 (indicated by red circle) (Hydrogeological Report, 2026)

Water Storage and Fire Fighting

The proposed development, with houses of floor area over 200m², is classified with respect to firefighting, as low-risk group 1 by the Red Book (2004). To achieve the minimal low risk group 1 residual water pressure of 7m and the firefighting flow rate of 900ℓ/minute, a 125mm Ø water supply pipeline is required from borehole 134C and associated future reservoir, to convey water to the development. Borehole 134C is located to the Southwest of Main Road 268 and the new 140m^3 reservoir (±144m²) is proposed in close proximity to this borehole. It was previously recommended that a 130m^3 SBS Tank reservoir be constructed near (the unused) borehole 134A, however, this is no longer preferred nor proposed due to the increased firefighting capacity requirement. The size of the reservoir was determined by the required firefighting capacity (108m^3) plus the daily demand of 16,8m^3/day. To ensure that sufficient firefighting capabilities exist, the supply pipeline from the proposed 140m^3 reservoir (±144m²) to the development will consist of a 125mm Ø Class 9 uPVC water main complete with isolating valves, fire hydrants and erf connections. (Drawing HESRIV-573-W1). A 6m servitude will be registered for the pipeline route.

Water Link Services

A new 125mm Ø, Class 9, uPVC water main will be constructed between the reservoir and development complete with isolating valves, fire hydrants and erf connections. The pipeline will be approximately 1090m in length and will run within an existing disturbed access/boundary corridor and will transport potable water from the existing borehole 134C and associated new 140m^3 reservoir (±144m²). A 200mm Ø corrosion protected steel sleeve will cross Main Road 268 between the two fence lines. A 125mm Ø HDPE fusion welded water main will be constructed through the steel sleeve. Water mains parallel to Main Road 268 will be constructed within the 5m building line. Erf connections will consist of HDPE PE80 PN12,5 pipes and terminated with endcaps.

ELECTRICITY

Eskom supplies the area with a 22kV overhead line network. The formalised Infanta residential area has underground reticulation networks, whilst the various farms in the area are fed via an overhead line network. The development will be supplied from the existing 22kV overhead line network along the access road going into Infanta. The existing house is fed from a 25kVA pole transformer. This transformer will have to be upgraded to accommodate the required 115kVA. This electrical demand is based on 28 units, however, only 20 additional units are proposed. The low voltage distribution system will be supplied from the abovementioned transformer via underground copper cable supplying strategically positioned distribution kiosks. Additional provision for solar energy will be allowed for per house.

Confirmation from Eskom that sufficient capacity exists on the 22kV network to supply the required load and the electrical report is included in the draft BAR for comment.

SEWAGE

The existing dwelling on Erf 134 will retain its existing connection to the on-site septic tank. It is proposed that each new erf (20) be fitted with an on-site WWTW Package Plant to handle the expected sewage flow. The factory built activated sludge sewage treatment plant is designed to produce effluent that meets the Department of Water and Sanitation General Standards. According to the Manufacturer's (Maskam Water) design criteria the system has the following characteristics:

• Odourless and quiet under normal operating conditions.
• The installation is underground.

• Has a small footprint and requires only six-monthly service intervals.
• Effluent meets the DWS General Standard.
• Includes nitrification and de-nitrification cycles.

Each proposed Maskam Fusion wastewater treatment unit incorporates a sedimentation chamber that separates and retains solids (sludge) and fats/grease (scum) from incoming wastewater. Suspended solids are further captured within the biological treatment chambers, with backwashed material returned to the sedimentation chamber for further digestion. As with centralised treatment plants, accumulated sludge requires periodic removal as part of servicing. Removal is generally only required every 4–6 years under normal operating conditions and may extend to approximately 10 years with seasonal occupation, subject to actual sludge accumulation and the manufacturer's maintenance requirements. Removed sludge will be collected by a suitable service provider and transported to a facility authorised to receive it.

The smallest available model is the ZF450 which has a capacity to treat 1,500ℓ/day which is well above the expected 640ℓ/day sewage flow per household. The wastewater package treatment plants will treat sewage to standard limits before the treated effluent is discharged into soakaways, in line with the common practice for residences in the Infanta area. Each package plant will have approximate dimensions of 2.160m long × 1.120m wide × 1.580m high. This equates to a footprint of approximately 2.42m² per unit, or approximately 48.4m² collectively for the 20 units.

STORMWATER

Stormwater Management Strategy

It is estimated that stormwater runoff, depending on erf coverage, will increase by approximately 25% post development. The following measures are proposed to mitigate the impact of post development stormwater runoff downstream from the proposed development:

- Installation of 5,0m^3 water tanks on each residential erf will contribute to the attenuation of initial runoffs. The tank overflow will be directed to underground soakaways. With the expected Mean Annual Precipitation (MAP) of 430mm/year, an average roof size of 215m² and 80% efficiency rate of the expected annual rainwater harvesting per unit will be around 74kℓ/household.
- The runoff from any hardened surface, within the developed plots, will be directed towards gardens using strategic landscaping with native vegetation to intercept the runoff.
- The concentration of stormwater runoff will be minimised through the application of landscaping techniques, i.e. by creating grass lined swales, undulations and depressions. These cutoff swales will intercept any overland flow, which will discourage erf runoff to road surfaces.
- Stormwater from road surfaces will be released into the water course through energy dissipating Reno Mattresses structures.

Stormwater Design

Stormwater infrastructure will be constructed in accordance with the standard requirements and specifications as agreed with the Swellendam Municipality. The 100-year flood lines were determined and fall outside the development area. Runoff rates will be determined according to the Rational Method. Design criteria adopted for the development regarding stormwater infrastructure is summarised as follows:

- Pipe material: Concrete
- Pipe class: 75D
- Pipe diameters: Minimum 375mm Ø up to diameter as required
- Bedding: Class C
- Inlets: Kerb and grid inlet structure for the Northern erven. Open stone pitched channel, in stormwater servitude, for the Southern erven.
- Manholes: Point of deflections on pipes

SOLID WASTE

Solid waste generation will vary seasonally, with the highest volumes expected during December–January and other school holidays, and lower volumes during winter. The estimated average volume is between 0.15 and 0.25 m³ per household per week. Homeowners will deliver household waste to the proposed Waste Transfer Station / Refuse Area, approximately 40 m² in size, at the Northern entrance to the site. Swellendam Local Municipality will service the transfer station on Tuesdays and transport uncompacted general waste to the Swellendam Municipal Solid Waste Site, consistent with the collection arrangements for the rest of Infanta. No waste treatment will occur on site.

General household waste, recyclables and garden waste will be separated at source and stored in designated containers or areas within the Waste Transfer Station / Refuse Area. Recyclable waste will be collected by Swellendam Local Municipality during its normal collection run. Garden waste will be stored separately at the existing Infanta garden waste facility and removed to an appropriate municipal facility as and when required, unless suitable chipping or composting arrangements are incorporated into the development's waste-management measures as part of landscaping. Collection arrangements for each waste stream will be confirmed with the Municipality before occupation.

Refer to **Appendix G1** Architectural Guidelines; **Appendix G3** Civil Engineering Services report; **Appendix G4** Electrical Services report; **Appendix E2 to E4** services confirmation letters.

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

There is an existing access road (from MR268) that will be used to access the Northern section of the proposed development. This road (MR268) will be rezoned to Transport Zone 2 (Provincial Road / Public Road) and ownership of this land will be transferred to the provincial roads authority. The Southern access point to the 5 units South of the watercourse will be taken off Hoek Street. Access off this road will likely be subject to an agreement to be reached with the Municipality in terms of its construction and hardening to requisite specifications. All private internal roads remains with the developer and the HOA in terms of maintenance responsibilities.

The existing road network has sufficient spare capacity to accommodate the proposed development and the expected additional trips to and from the proposed development will have an insignificant impact on the surrounding road network.

The proposed internal road reserves are 8m wide. The access roads as well as the internal road network will consist of 4,5m wide road surfaces. Road finishing will consist of 60mm Interlocking segmented paving with stormwater pipework, open stone pitched channel and inlet- and outlet structures. The development includes three internal streets. Street 1 (existing road access off MR268) will be approximately 242.49m long, with a footprint of approximately 1 939.92m²; Street 2 will be approximately 46.42m long, with a footprint of approximately 371.36m²; and Street 3 (new access off Hoek Street) will be approximately 31.76m long, with a footprint of approximately 254.08m². The design criteria will be based on the design standards of the Guidelines for the Provision of Engineering Services and Amenities in Residential Township Development. Suitable commercial sources for the construction materials are available within Swellendam municipal area and surrounding towns.

Input from WCG Roads was obtained and is attached as **Appendix E2**.

A Traffic Impact Statement and addendum was compiled for the proposed project and are attached as **Appendix 14A and 14B**.

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	***C07300040000013400000***			
4.7.	Coordinates of the proposed site(s) for all alternatives:				
	Latitude (S)	**34º**	**25'**	**07.78"**	
	Longitude (E)	**20º**	**51'**	**13.14"**	

SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS

1. Exemption applied for in terms of the NEMA and the NEMA EIA Regulations

Has exemption been applied for in terms of the NEMA and the NEMA EIA Regulations. If yes, include a copy of the exemption notice in Appendix E18.	~~YES~~	**NO X**

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

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). **Refer Appendix G7A and G7B and G7C for setback line determination**	**YES X**	~~NO~~
The National Heritage Resources Act, 1999 (Act No. 25 of 1998) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as **Appendix E1 (E1A-E1D).**	**YES X**	~~NO~~
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3. **A WULA has been lodged with BOCMA – refer Appendix M.**	**YES X**	~~NO~~
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM: AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	~~YES~~	**NO X**
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM: WA")	~~YES~~	**NO X**
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	**YES X**	~~NO~~
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	~~YES~~	**NO X**
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as **Appendix E5**.	**YES X**	~~NO~~

3. Other legislation

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

Spatial Planning and Land Use Management Act, 2017

The Spatial Planning and Land Use Management Act, 2017, sets out a set of applicable development principles for assessment of all land use matters: spatial justice; spatial sustainability; efficiency; spatial resilience; and good administration.

Compliance with the Development Principles of SPLUMA (Section 7. of SPLUMA):

(a) The principle of spatial justice: The proposal will provide job opportunities during construction and limited job opportunities during operations. The proposed Public Open Space and coastal walkway provide for formal public access along the coastal frontage. This supports access to shared amenities.

(b) The principle of spatial sustainability: The proposal entails residential development on a 3.89ha portion of the 85.6ha property, within Infanta's urban edge on land identified for residential expansion in the SDF. Its location adjacent to existing residential development supports contained urban growth. The layout incorporates specialist recommendations and retains sensitive areas within the proposed Natural Environment Zone. Development costs will be borne by the developer, with water and wastewater services provided through on-site systems and electricity supplied by Eskom. Applicable municipal service contributions and property rates will be payable. These measures support alignment with the principle of spatial sustainability.

(c) The principle of efficiency: The proposal uses the existing borehole, access roads and Eskom network, supplemented by new water infrastructure and a transformer upgrade. Individual wastewater-treatment systems reduce reliance on municipal sewerage infrastructure, while provision is made for solar energy at each dwelling. The traffic assessment and provincial roads authority's comments support the adequacy of the existing road infrastructure for the proposed development. These measures support efficient use of existing resources and infrastructure.

(d) The principle of spatial resilience: The residential development is positioned landward of the site-specific coastal setback line, informed by coastal hazards and projected sea-level rise. Approximately 1.1ha will be zoned Natural Environment Zone, incorporating sensitive vegetation and a 40m-wide ecological corridor comprising a 20m buffer on either side of the ephemeral drainage line's centreline. These measures support spatial resilience by accounting for future coastal risks and retaining sensitive ecological areas.

e) The principle of good administration: The environmental assessment and land-use application processes provide for specialist input, authority review and public participation. Comments received are documented and addressed in the Comment and Response Report.

4. Policies

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

Western Cape Provincial Spatial Development Framework (2014)

The Provincial Spatial Development Framework (PSDF) is the overarching policy document in the Western Cape outlining mandatory measures and guidelines for addressing current challenges and directing the future growth and development of the Province.

Local Spatial Development Frameworks need to align themselves with the spatial principles contained in the WCPSDP. The document describes the rural space-economy agenda, which is not only about agricultural development, but also about broad based agrarian transformation, diversifying rural economic activities, including tourism and functional ecosystems. Local government fulfils crucial support roles in the implementation of the national Comprehensive Rural Development Programme (CRDP). The CRDP is targeted at 15 rural development nodes across the Province where participatory community-based planning is targeted at agrarian transformation as well as strategic investments in economic and social infrastructure. Swellendam as a whole is identified as one of these nodes (see extract below). The application complies with the principles contained in the WCPSDF.

Specific PSDF directives which potentially have bearing on the Erf 134 development include:

Sustainable development
Optimise the provincial settlement pattern with regard to where people live and the availability of resources, particularly water, land and future economic potential for growth (Mandatory directive).

Sense of place
Foreign or unsympathetic styles of site layout and buildings shall be discouraged in urban settlements and rural areas so as to strengthen the local sense of place and minimize visual impact (Mandatory).

The PSDF promotes sustainable settlement patterns, resource efficiency and protection of local character. The proposal responds through development within Infanta's urban edge, retention of sensitive areas and use of existing infrastructure. Architectural and Landscaping Guidelines (**Appendix G1**) provide for building scale, appearance and landscaping appropriate to the local context, which will be enforced on all buyers.

Swellendam IDP
The Swellendam IDP states that Infanta falls within Ward 3, Rural Node. The spatial settlement pattern of this area can be described as dislocated with development having taken place in three compact yet separate clusters; Infanta, Kontiki and Infanta Park.

The IDP identifies Infanta's remoteness, sensitive coastal environment and limited infrastructure capacity as development constraints. The proposal responds through borehole water supply, individual wastewater-treatment systems and an Eskom transformer upgrade. Specialist recommendations and the coastal setback assessment inform the layout and mitigation measures.

Swellendam Spatial Development Framework (SDF) May 2020
The Swellendam Spatial Development Framework (SDF),2020, identifies the area in question as falling within the urban edge and as an urban extension area, the scale and form of which is to be determined by an Integrated Environmental Management (IEM) process. The planning document, which is the product of an extensive public participation process undertaken, has been adopted by the Swellendam Local Municipality. The proposed change in land use is for land positioned inside the designated urban edge and is in keeping with the Swellendam (SDF) (approved by the Swellendam Local Municipality). This document identifies the proposed uses as 'desired' land uses.

This Spatial Development Framework (SDF) is the most credible representation of the present-day local spatial planning paradigm. The composite map included in the SDF clearly shows the area in question as an area situated within the urban edge of Infanta and identifies the land suitable for residential development. The proposed rezoning of the site in question for residential purposes is therefore entirely in keeping with current and up to date planning policy. While the document provides a clear indication of the positioning of the Urban Edge Line and the number of dwelling unit opportunities, notional areas are presented for land to be developed and areas to be retained

as natural open space. These "zones" are essentially schematic, and the document makes it very clear that the exact detail of any proposal must be informed by all the necessary specialist studies required to address all pertinent issues.

At the time that the Swellendam Local Spatial Development Framework was compiled, no such detailed studies were undertaken and for this reason the diagrams provided indicate notional concepts. A series of specialist studies undertaken by respected specialists in their various fields have now been completed and the recommendations contained in these studies have informed the exact nature of the development concept proposed. On-site specialist analysis of flora and fauna has resulted in area specific evaluations. What has become clear from the results of these studies is that it is simply not possible to assign specific uses to the site without undertaking such specialist studies, as many of the critical issues are quite area specific. This is something that the Swellendam SDF acknowledged.

The public access road indicated in the Growth Management Plan which is notionally positioned on the northern boundary of the property, cannot be accommodated in that position on Erf 134. This is due to the fact that a large portion of the northwestern corner of Erf 134 has been identified in the specialist study undertaken, to have extremely high conservation status. The Specialist studies undertaken have therefore necessitated the revision of the initial design proposal to ensure that no development or access of any manner occurs on this part of the property. The proposed point of vehicular entry on the Growth Management Plan is also not acceptable to the Provincial Roads Engineer due to obscured sight lines at that point. This is due to the contoured landscape. For this reason, the access indicated on the Growth Management Plan requires revision. It is therefore proposed that the access way as proposed in this application, be utilised to link up with the remainder of the road, as per the Growth Management Plan, on the adjacent property if it is needed in future. Furthermore, it is simply not physically possible to locate parking in the northeast corner of the property as there is an existing grave of significance in this area which cannot be relocated. There are no physical hindrances to the accommodation of this concept on the adjoining land. There would be no objection from the applicant to such a proposal.

Swellendam Municipal By-Law on Land Use Planning, 2020

The application to rezone the land from Agricultural Zone to Subdivisional Area to permit land to be zoned Residential Zone 1, Open Space Zone 2, and Transport Zone 2 (Public Road), is made in terms of Section 15(2)(a) of the Swellendam Municipal By-Law on Land Use Planning, 2020. The application to subdivide the land in accordance with the plan of subdivision submitted is made in terms of Section 15(2) (d) of the Swellendam Municipal By-Law on Land Use Planning, 2016. The applications at hand must be assessed in terms of Section 65 of the Swellendam Municipal By-Law on Land Use Planning, 2016.

Infanta and Environs Local Spatial Development Framework (SDF)

The Infanta and Environs Local Spatial Development Framework (SDF) identifies the area in question as falling within the urban edge and as an urban extension area, the scale and form of which is to be determined by an Integrated Environmental Management (IEM) process. Please refer to the Planning Report attached as **Appendix G6** for further detail on the planning policies associated with the proposed development.

Breede River Estuarine Management Plan, June 2016

The National Estuarine Management Protocol (the Protocol), promulgated in May 2013 under the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008, as amended by Act No.36 of 2014), sets out the minimum requirements for individual estuarine management plans. Under the ICM Act, the default Coastal Protection Zone (CPZ) is a continuous strip of land extending from the coastal and estuarine high-water mark to at least 1 000m inland in rural areas, and 100m in urban areas, covering all areas not already zoned for residential or industrial development. The relevant municipalities are required to incorporate the default CPZ and coastal management lines and proposed coastal overlay zones, once adopted, within their spatial development frameworks and land use management systems in order to manage and regulate the use of land at the coast and ensure an adequate buffer for the estuary. A GIS development buffer of 1000m is included in the management plan. The ground truthing has been carried out on site.

A portion of the site is subject to the 100m general coastal development setback, as contemplated in the Integrated Coastal Management Act. The Act provides for more specific, urban-edge related development setbacks from provincial and local authorities. A specialist coastal setback-line assessment was undertaken to guide the development and determine an appropriate site-specific development setback. The assessment considered the stability of the rocky shoreline between 1984 and 2023, the high-water mark, the Western Cape Coastal Management Lines, projected storm-wave run-up, coastal erosion, the 100-year flood line, and projected sea-level rise of approximately 1m by 2100. The assessment found that the rocky shoreline is relatively stable, with little to no long-term erosion or accretion, although storm surges may penetrate further inland through the lower-lying stream outlet.

The specialist therefore defined the appropriate Development Setback Line by combining the landward extent of the 100-year flood line with the projected 2100 coastal storm-hazard line, including a storm-hazard elevation of approximately +5m MSL. The proposed residential infrastructure will be positioned landward of this setback line and outside the area expected to be affected by flooding and coastal processes, including future sea-level rise. The proposed raised coastal walkway is the only infrastructure proposed seaward of the development setback and must be designed to accommodate occasional storm-wave run-up. Refer **Appendices G7C**.

5. Guidelines

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

DEA&DP's EIA Guideline and Information Document Series

Applied to various components in the Basic Assessment process. The following guidelines were taken into account throughout this Basic Assessment process:

- Guideline for EIA Regulations (2006)
- Guideline for Public Participation (2017)
- Guideline on the review of Specialist input in the EIA process (June 2005)
- Guideline for Involving a Heritage Specialist in an EIA process (2005)
- Guideline on Alternatives (March 2013)
- Guideline on Need and Desirability (2017)
- Guideline for Involving Biodiversity Specialists in EIA Processes (2005)
- Guideline for Environmental Management Plans (2005)

DEA&DP's Circular DEADP 0028/2014: "One Environmental Management System"

This circular provides further detail and clarity on the procedure to be followed during the Basic Assessment process, where a Water Use application is lodged at the same time.

DEA&DP's Circular DEA&DP 0004/2021: "Coastal Risk in Land Use Decisions"

This circular provide detailed guidelines for consideration of coastal risk in land use decisions, as well as the way forward with respect to the establishment and implementation of Coastal Management Lines in terms of the NEM:ICMA'. This ensured that a precautionary approach is adopted with respect to land use decisions within risk areas.

6. Protocols

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

The following themes and sensitivities were identified in the screening tool (dated October 2025):

Theme	Sensitivity rating			
	Very high	High	Medium	Low
Agriculture			X	
Animal species			X	
Aquatic biodiversity	X			
Archaeological & Cultural Heritage		X		
Civil aviation		X		
Defence				X
Palaeontology		X		
Plant Species			X	
Terrestrial Biodiversity	X			

The Screening Tool identified eight specialist assessments for consideration. The table below confirms how each requirement was addressed and records the basis for any assessment that was not undertaken as a separate specialist study:

No.	Screening Tool-recommended assessment	Status	SSVR finding and conclusion
1	Landscape / Visual Impact Assessment	Not undertaken as a separate study	Visual and sense-of-place impacts were addressed in the Heritage Assessment's and Social Impact Assessment. The Architectural Guidelines and proposed 8m landscaped strip will reduce the residual impact to Low. HWC did not request a separate Visual Impact Assessment.

2	Archaeological and Cultural Heritage Impact Assessment	Undertaken	The Heritage Statement and Archaeological Impact Assessment were accepted by HWC. The development may proceed subject to monitoring of bulk earthworks and implementation of the chance-find measures as set out in the EMPr. The radiocarbon dating has been completed and is contained in the 2012 Archaeological Impact Assessment report.
3	Palaeontology Impact Assessment	Not undertaken as a separate study	No palaeontological resources of concern were identified through the heritage process. HWC did not request a further study, and a chance-find protocol will apply during excavation.
4	Terrestrial Biodiversity Impact Assessment	Undertaken	The Botanical Assessment verified the affected habitats and CBA/ESA context. With avoidance, footprint control, rehabilitation and alien-vegetation management, impacts are Very Low for the residential development and Low for the pipeline.
5	Aquatic Biodiversity Impact Assessment	Undertaken	The Freshwater Assessment verified the ephemeral stream and prescribed a 40m-wide ecological corridor. The residential and wastewater infrastructure avoids the corridor, and residual impacts will be Low with mitigation.
6	Socio-Economic Assessment	Undertaken	The Social Impact Assessment and 2023 Addendum support the preferred development. Positive employment and business impacts are expected, while identified negative impacts will be reduced to Low through mitigation.
7	Plant Species Assessment	Undertaken	The Botanical Assessment verified sensitive plant habitat and species of conservation concern. The preferred layout avoids most confirmed *Erica oblongiflora* individuals and retains the core Limestone Fynbos habitat. Residual impacts will be Low with mitigation.
8	Animal Species Assessment	Compliance Statement undertaken	The 2024 specialist Compliance Statement verified the Animal Species Theme sensitivity as Low and concluded that a full specialist impact assessment was not required. No significant impact on faunal species of conservation concern is anticipated.

Refer to the Site Sensitivity Verification Report (SSVR) **Appendix K.**

Specialist assessments were compiled to align with the NEMA protocols and the requirements in terms of Appendix 6 of the NEMA regs.

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 1**	Describe the portion of the proposed development to which the applicable listed activity relates.
9	*The development of infrastructure exceeding 1 000 metres in length for the bulk transportation of water or storm water-* *(i) with an internal diameter of 0.36 metres or more; or* *(ii) with a peak throughput of 120 litres per second or more;* *excluding where-* *(a) such infrastructure is for bulk transportation of water or storm water or storm water drainage inside a road reserve or railway line reserve; or* *(b) where such development will occur within an urban area.*	The proposed bulk potable water pipeline will be 1090m in length; however, the diameter will be below 360mm (125mm Ø). It should also be noted that the pipeline will run within the urban edge from where it crosses the MR268. As such, this listed activity does not apply.
12	*The development of—* *(i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or* *(ii) infrastructure or structures with a physical footprint of 100 square metres or more;* *where such development occurs-*	Portions of some of the residential units will be constructed within 32m of the watercourse on site. However, these buildings will be located outside the 1:100-year flood line, outside the 40m Freshwater Ecological buffer, and landwards of the proposed setback line.

	(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 development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;* *(bb) where such development 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 development occurs within an urban area;* *(ee) where such development occurs within existing roads, road reserves or railway line reserves; or* *(ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.*	
18	*The planting of vegetation or placing of any material on dunes or exposed sand surfaces of more than 10 square metres, within the littoral active zone, for the purpose of preventing the free movement of sand, erosion or accretion, excluding where –* *(i) the planting of vegetation or placement of material relates to restoration and maintenance of indigenous coastal vegetation undertaken in accordance with a maintenance management plan; or* *(i) (ii) such planting or vegetation or placing of material will occur behind a development setback.*	Erven that partially extend in front of the setback line, the walkway, the section of the drainage line and its buffer area in front of the setback line, may require planting with indigenous vegetation where alien vegetation removal has occurred.
19	*The infilling or depositing of any material of more than 10m³ into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10m³ 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*	The potable pipeline, services installation and the walkway will cross the drainage line for installation, and this may require movement of more than 10m³ material from the watercourse. The potable line and the services installation is landward of the setback line as determined by a specialist and is excluded from this listed activity. The stormwater infrastructure within the drainage line's regulated area also falls seaward of the setback line, thus is included in this listed activity.

	(e) where such development is related to the development of a port or harbour, in which case Activity 26 in Listing 2 of 2014 applies.	
19A	*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—* *(i) the seashore;* *(ii) the littoral active zone, an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever distance is the greater; or* *(iii) the sea; —* *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* *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.*	$10m^3$ of material may be excavated, moved or infilled within 100m from the high-water mark (HWM) for the establishment of the walkway and associated infrastructure. A setback line has been determined by a specialist, and no construction activities will occur in front of this line, outside of the walkway which will be on stilts. The stormwater infrastructure within the drainage line's regulated area also falls seaward of the setback line, thus is included in this listed activity.
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-* *the undertaking of a linear activity; or maintenance purposes undertaken in accordance with a maintenance management plan.*	More than 1ha of indigenous vegetation will be cleared for the proposed development.
Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 3**	Describe the portion of the proposed development to which the applicable listed activity relates.
4	*The development of a road wider than 4 metres with a reserve less than 13,5 metres.* *Western Cape* *i.Areas zoned for use as public open space or equivalent zoning;* *ii. Areas outside urban areas;* *(aa) Areas containing indigenous vegetation;* *(bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or* *iii. Inside urban areas:* *(aa) Areas zoned for conservation use; or*	The internal roads of the development will be constructed in areas that contain indigenous vegetation. Internal roads will be approximately 4.5m wide, with 8m wide road reserves.

	(bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority.	
12	*The clearance of an area of 300m² or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.* *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;* *(ii) Within critical biodiversity areas identified in bioregional plans;* *(iii) Within the littoral active zone or 100m inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas;* *(iv) On land, where at the time of coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or* *(v) On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.*	Clearance of vegetation will exceed 300m² within the area seaward of the setback line determined by a specialist. This falls within the littoral active zone.

Note:
- The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted.
- Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.

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

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

List the applicable listed activities in terms of the NEM:AQA

Activity No(s):	Provide the relevant **Listed Activity(ies)**	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A		

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

Alternative 4: This is the preferred alternative. Alternative 4 replaces Alternative 3, the preferred layout presented in the first DBAR, following further specialist studies, authority feedback and recommendations, and I&AP input. It retains 21 residential erven, comprising the existing dwelling and 20 new dwellings (15 single-storey and five double-storey). The proposed gross density is approximately 5.4 units/ha. This alternative still makes provision for a 40m ecological corridor (20m either side of the drainage line) catering for the watercourse and surrounding sensitive features. It also accommodates the 'limestone conservation area' in the Northwest part of the site. The layout retains the 8m landscaped strip recommended by the heritage specialist and incorporates the updated coastal development setback line determined by the coastal specialist.

The principal changes from Alternative 3 are:

- Minor revisions to the internal road network and erf boundaries, with most residential erven enlarged. The two access arrangements remain largely unchanged.
- Realignment of the potable-water pipeline outside the MR268 road servitude, as requested by BOCMA to avoid damage during road maintenance.
- Formalisation of approximately 1.1 ha as Natural Environment Zone, incorporating sensitive vegetation and the 40m-wide ecological corridor (20m either side of the drainage line's centreline).
- Clearer depiction of, and layout refinements responding to, the updated coastal development setback line, Coastal Management Line and high-water mark.
- More detailed depiction of the approximately 3 439m² Public Open Space and raised, wheelchair-accessible coastal walkway (approximately 2m wide and 195m long).
- Inclusion of proposed stormwater outlet structures within the ecological corridor and removal of the 50m-radius circles for drawing clarity.
- Inclusion of servitude areas (borehole, reservoir and access road) West of the MR268.
- Further refinement of access to Erf 201 & beach access.
- Inclusion of detail on servitude areas East of MR268.

SECTION 27(C) - EFFICIENT AND BENEFICIAL USE OF WATER IN THE PUBLIC INTEREST
The proposal incorporates 5m³ rainwater-harvesting tanks at each new dwelling to supplement borehole water supply. The assessed sustainable yield of borehole BH134C exceeds the estimated development demand, subject to recommended abstraction limits and monitoring controls. Groundwater abstraction will be subject to applicable authorisation requirements. These measures support efficient water use and reduce reliance on municipal water supply.

Refer to **Appendix B4A** for the Alternative 4 layout (preferred development alternative).

2.	Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21.

Erf 134, Infanta, is currently zoned Agricultural Zone I in terms of the Section 8 Scheme Regulations of the Land Use Planning Ordinance (15 of 1985). The primary use permitted in terms of the Scheme is agriculture, which according to the definition, makes provision for the cultivation of the land and allows for the construction of any buildings that are reasonably connected to the main farming activities of the farm.

The activity is therefore not permitted under the existing zoning of the land. It is proposed to rezone a 3.89ha portion of Erf 134 from Agricultural Zone (AZ) to Subdivisional Area in terms of Section 15(2)(a) of the Swellendam Municipal Planning Bylaw of November 2020. The following zonings are proposed for various portions of the site: Residential Zone 1 (RZ1), Public Open Space (POS), Private Open Space (PrOS), Natural Environment Zone (NEZ), Utility Zone (UZ), Transport Zone 1 (TZ1 – Private Road) and Transport Zone 2 (TZ2 – Provincial/Public Road). The application is made in terms of section 15(2) of the Swellendam Municipal By-law on Land Use Planning, 2020, read with section 3 of the Swellendam Municipality Integrated Zoning Scheme, June 2020, and will permit the development of 20 additional single residential dwellings in accordance with the proposed layout plan.

The areas to be rezoned are as follows:

Proposed Zoning	Area (m²)	Percentage of Developable Area	Portion number for reference as per SDP (Appendix B4A)
Residential Zone 1	13 377m²	34,3917%	1-21
Public Open Space	3 439m²	8,8415%	22
Private Open Space	48m²	0,1234%	25
Natural Environment Zone	10 758m²	27,6584%	23 & 24
Utility Zone	37m²	0,0951%	26
Transport Zone 1 – Private Roads	2 903m²	7,4635%	27 & 28

Transport Zone 2 – Provincial / Public Roads	8 334m²	21,4264%	29
Total	**38 896m²** (3.89ha)	**100 %**	

The remainder of the current Erf 134 (which entails the vast majority of Erf 134 located to the West of Main Road 268 (±81.7ha), will not be rezoned and will remain zoned for agriculture, and remain in its current natural vegetated state. Almost 28% of the 3.89ha portion is conservation worthy and therefore not desirable for agricultural use, and the remainder of the land is largely comprised of limestone with very low agricultural potential. There is no associated loss of food production or agricultural productivity associated with the rezoning of this agricultural land.

For more detail refer to the Architectural Guideline (proposed rezoning) as **Appendix G1** and the Planning Motivation Report attached as **Appendix G6**.

3.	Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved.

There are no existing approvals.

4.	Explain how the proposed development will be in line with the following?
4.1	The Provincial Spatial Development Framework.

The Provincial Spatial Development Framework (PSDF) is the overarching policy document in the Western Cape outlining mandatory measures and guidelines for addressing current challenges and directing the future growth and development of the Province. The PSDF promotes sustainable settlement patterns, responsible resource use and protection of local character.

Local Spatial Development Frameworks need to align themselves with the spatial principles contained in the WCPSDP. The document describes the rural space-economy agenda, which is not only about agricultural development, but also about broad based agrarian transformation, diversifying rural economic activities, including tourism and functional ecosystems. Local government fulfils crucial support roles in the implementation of the national Comprehensive Rural Development Programme (CRDP). The CRDP is targeted at 15 rural development nodes across the Province where participatory community-based planning is targeted at agrarian transformation as well as strategic investments in economic and social infrastructure. Swellendam as a whole is identified as one of these nodes. The application complies with the principles contained in the WCPSDF.

Specific PSDF directives which potential have bearing on the Erf 134 development include:

Sustainable development

Optimize the provincial settlement pattern with regard to where people live and the availability of resources, particularly water, land and future economic potential for growth (Mandatory directive).

According to the Social Specialist, Tony Barbour, the water supply and the sinking of further boreholes in urban Infanta has been identified as a key concern in the Draft 2012-2017 IDP, as well as by many Infanta residents, and is acknowledged as a given constraint to economic, residential and tourism development in the area. The Infanta area does not currently accommodate any significant economic activity, and has limited short-medium term growth potential, including growth in the tourism sector. The near-pristine setting of Infanta, surrounded by significant conservation areas, and still largely untouched by one-upmanship pavilion-style architecture and urban trappings increasingly prevailing elsewhere in the coastal WCP, does however contribute to a sense of uniqueness that is valued by the majority of property owners.

The site lies within Infanta's urban edge on land identified for residential expansion in the municipal SDF. Alternative 4 incorporates specialist recommendations and retains approximately 1.1ha as conservation. The proposed development will be self-sufficient in terms of potable supply and sewage treatment and will incorporate renewable energy (solar) in the proposed energy supply for the site, even though electrical supply has been confirmed by ESKOM (refer letter **Appendix E3**).

Sense of place

Foreign or unsympathetic styles of site layout and buildings shall be discouraged in urban settlements and rural areas so as to strengthen the local sense of place and minimize visual impact (Mandatory).

The Architectural and Landscaping Guidelines (**Appendix G1**) regulate building scale, height, appearance and landscaping to respond to Infanta's existing character, which will be enforced on all buyers to implement. The layout retains the heritage specialist's recommended 8m landscaped strip and incorporates the site-specific coastal development setback line.

These measures support alignment with the PSDF, subject to implementation of the proposed controls and specialist mitigation measures. Refer to **Appendix G6** for the detailed planning motivation & supporting Appendices.

4.2	The Integrated Development Plan of the local municipality.

The vision of the Swellendam Local Municipality (SLM) is "*A visionary Municipality that strives towards prosperity for all through cooperative participation and high-quality service delivery*". The mission is:

- Providing a transparent and accountable government by rendering affordable and sustainable services and encouraging economic and social development through community participation;
- Transparent institutional and infrastructure development;
- Sustainable local economic development and the establishment of public/private partnerships;
- Governance for the people by the people;
- Service delivery through integrity.

The IDP identifies seven Strategic Objectives (SOs), namely:
- Enhance access to basic services and address maintenance backlogs (SO1);
- Create a safe and healthy living environment (SO2);
- Develop integrated and sustainable settlements with the view to correct spatial imbalances (SO3);
- Enhance economic development with focus on both first and second economies (SO4);
- Promote good governance and community participation (SO5);
- Create a capacitated, people-centered institution (SO6);
- Improve financial viability and management (SO7)

Five Key Performance Areas (KPA's) are listed in the IDP, namely:
- Basic service delivery
- Economic development
- Good governance and public participation
- Institutional development and transformation
- Financial management

The IDP notes that the SLM covers an area of approximately 3 840km² and consists of several towns and settlements, including Infanta. Infanta is in Ward 3 and is identified as a Rural Node. The IDP notes that the origins of Infanta are believed to be linked to the need for a 'pilot' to assist ships entering the mouth of the Breede River in the 1820's. The 'pilot' was stationed on the beach at Infanta with his residence on the farm Rietfontein. The original Infanta Allotment area was surveyed in the early 1920's for the subdivision of a few "4000 and 8000 square feet plots" for the purposes of erecting beach houses for a small number of the prominent families in Swellendam. Further subdivisions in the area occurred in the 1940's to create the settlement of Kontiki along the banks of the river northeast of the original settlement of Infanta. Based on the available aerial photography for the area most of the growth in and around Infanta occurred before 1967. The total number of structures had increased to 145 by 2000, with growth being focused mainly around Infanta Park (established in the late 1980's as a Resort zoning), with minor infill development taking place in Infanta. The IDP notes that the spatial settlement pattern of the area can be described as dislocated with development having taken place in three compact yet separate clusters; Infanta, Kontiki and Infanta Park.

The opportunities associated with Infanta are linked to its character as a coastal holiday town, located next to the mouth of the Breede River. The constraints are linked to the high energy coastline with limited safe bathing areas, remote location and limited infrastructure, all of which limit development opportunities. The constraints are also viewed by many local homeowners as a benefit in that it adds to the value of the area. Refer to **Appendix G6** for the detailed planning motivation & supporting Appendices.

4.3.	The Spatial Development Framework of the local municipality.

The Swellendam Spatial Development Framework (SDF) dated 2020, identifies the area in question as falling within the urban edge and as an urban extension area. A public access road and a parking area are indicated immediately to the North of the site, adjacent to its northern boundary. The area abutting what is termed a natural drainage feature is identified as an open space area. The associated Growth Management Plan depicts two zones identified as B and C with a suggested collective number of 18 additional units. Refer Figure 8.

This Spatial Development Framework (SDF) is the most credible representation of the present-day local spatial planning paradigm. The composite map included in the SDF clearly shows the area in question as an area situated within the urban edge of Infanta and identifies the land suitable for residential development. The proposed rezoning of the site in question for residential purposes is therefore entirely in keeping with current and up to date planning policy. While the document provides a clear indication of the positioning of the Urban Edge Line and the number of dwelling unit opportunities, notional areas are presented for land to be developed and areas to be retained as natural open space. These "zones" are essentially schematic, and the document makes it very clear that the exact detail of any proposal must be informed by all the necessary specialist studies required to address all pertinent issues.

At the time that the Swellendam Local Spatial Development Framework was compiled, no such detailed studies were undertaken and for this reason the diagrams provided indicate notional concepts. A series of specialist studies undertaken by respected specialists in their various fields have now been completed and the recommendations contained in these studies have informed the exact nature of the development concept proposed. On-site specialist analysis of flora and fauna has resulted in area specific evaluations. What has become clear from the results of these studies is that it is simply not possible to assign specific uses to the site without undertaking such specialist studies, as many of the critical issues are quite area specific. This is something that the Swellendam SDF acknowledged.

The public access road indicated in the Growth Management Plan which is notionally positioned on the northern boundary of the property, cannot be accommodated in that position on Erf 134. This is due to the fact that a large portion of the northwestern corner of Erf 134 has been identified in the specialist study undertaken, to have extremely high conservation status. The Specialist studies undertaken have therefore necessitated the revision of the initial design proposal to ensure that no development or access of any manner occurs on this part of the property. The proposed point of vehicular entry on the Growth Management Plan is also not acceptable to the Provincial

Roads Engineer due to obscured site lines at that point. This is due to the contoured landscape. For this reason, the access indicated on the Growth Management Plan requires revision. It is therefore proposed that the access way as proposed in this application be utilised to link up with the remainder of the road, as per the Growth Management Plan, on the adjacent property. Furthermore, it is simply not physically possible to locate parking in the northeast corner of the property as there is an existing grave of significance in this area which cannot be relocated. There are no physical hindrances to the accommodation of this concept on the adjoining land. There would be no objection from the applicant to such a proposal.

The proposed 20 additional units are therefore in line with this Growth Plan**.** With reference to the proposed development, the site is located within the defined rural edge of Infanta., in an area that has been identified for future residential development. The developer has also addressed the issue of services, and the design considers issues of scale. Refer to **Appendix G6** for the detailed planning motivation & supporting Appendices.

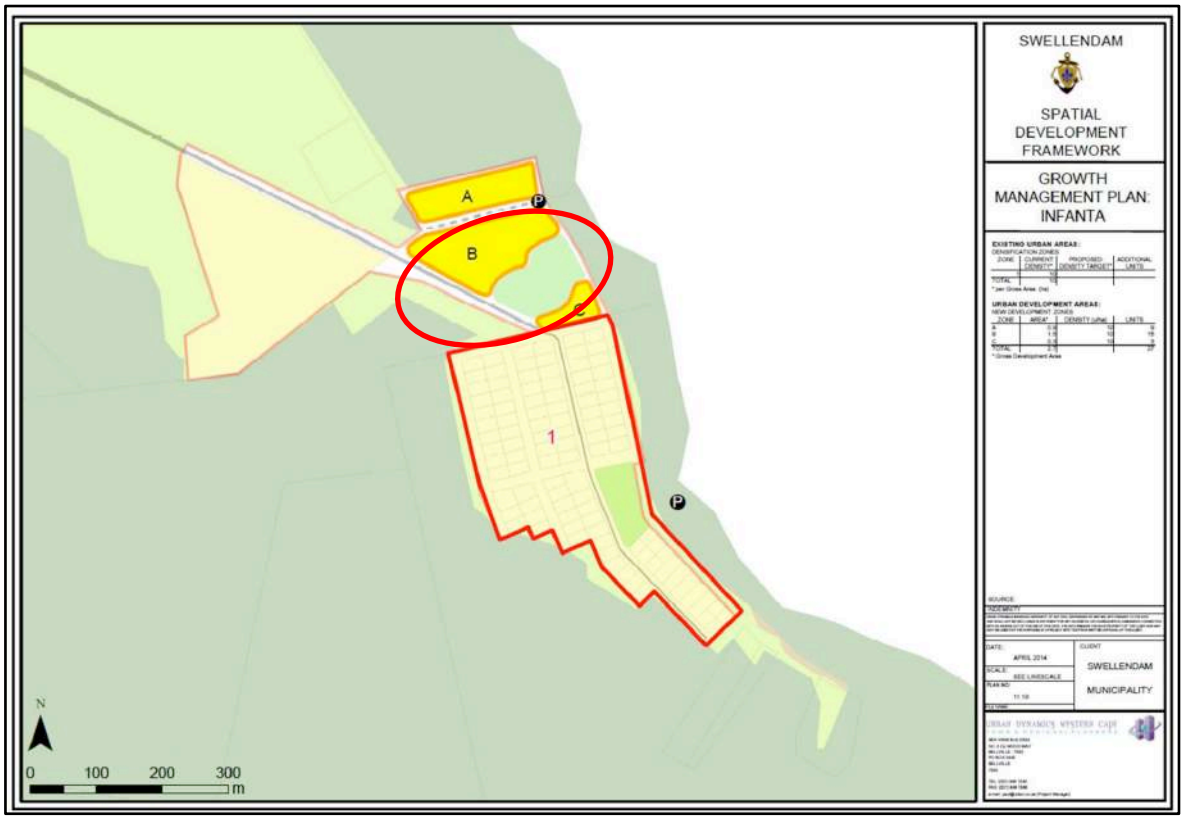


Figure 8: Growth Management Plan for Infanta (Planning Motivation Report, 2026)

4.4.	The Environmental Management Framework applicable to the area.

No EMF has been adopted for this area.

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

Biodiversity: CapeNature & DEA&DP requested updated botanical fieldwork and biodiversity information, as well as clarification of mapped Critical Biodiversity Areas and site sensitivities. The August 2026 botanical assessment informed retention of sensitive vegetation within approximately 1.1ha of Natural Environment Zone. CapeNature's recommendations also informed alien invasive species and fire management measures for inclusion in the EMPr, as well as the requirement for an initial burn prior to construction. Previous comments from CapeNature also informed the requirement for a conservation management plan that takes into account periodic fire management, which will be formulated for the conservation area.

Freshwater: Specialist recommendations informed the 40m-wide ecological corridor along the drainage line. CapeNature requested investigation of pipeline avoidance of this corridor; the alignment follows BOCMA's recommendation to avoid road-maintenance damage, with trenching and rehabilitation measures addressing the remaining crossing impacts.

Coastal constraints: CapeNature and DEA&DP comments prompted further consideration of the Coastal Management Line. The July 2026 coastal assessment determined a site-specific development setback incorporating projected coastal hazards to 2100 and the 1:100-year flood line, which informed the revised layout.

Heritage and landscape: The layout retains the heritage specialist's recommended 8m landscaped strip along the Western boundary to address visual and landscape impacts.

6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development.

Figure 9 below indicates the CBA and ESA areas that were identified for the site. The Northern portion of the development will fall within an Ecological Support Area, but forms part of the area earmarked for conservation i.e. no-go area. Furthermore, the CBA1 mapped areas affected by the residential development are previously disturbed, alien-invaded or transformed, and no intact CBA or ESA habitat will be directly affected by the proposed residential development. The bulk-water pipeline does, however, traverse natural Albertinia Sand Fynbos and mapped CBA/ESA areas of Very High sensitivity. However, as the pipeline follows a narrow, existing disturbed boundary/access corridor, its impact is localised and is not expected to materially compromise ecological connectivity or the functioning of the biodiversity network. Subject to strict footprint control, rehabilitation and alien-vegetation management, terrestrial biodiversity impacts are assessed as Very Low for the residential development and Low for the water infrastructure. Refer to Botanical Assessment in **Appendix G9B.**



Figure 9: Critical Biodiversity Area & Ecological Support Area map (2023 WCBSP, Plant Species and Terrestrial Biodiversity Assessment, Dr David Hoare – BioCensus, 2026)

CBAs are areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure. The management objective for this CBA is as follows: Maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate. It should be noted that only a small corner of the CBA overlaps the proposed development site where most of the area has already been cleared. The remainder of the CBA area will be conserved.

Ecological Support Areas are areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of PAs or CBAs and are often vital for delivering ecosystem services. The management objective of ESA is to restore and/or manage to minimize impact on ecological processes and ecological infrastructure functioning, especially soil and water-related services, and to allow for faunal movement. To this end the layout of the development has made adequate accommodation for the river corridor contained in the ecological support area with an appropriate 40m-buffer to protect the water course corridor.

Refer Freshwater Ecological Report **Appendix G8** and Botanical Impact Assessment **Appendix G9B**. A faunal compliance statement was also completed (**Appendix G10**) and found that none of the bird and invertebrate SCC that were flagged by the screening tool report are of significance to the proposed development – and thus they do not present any constraints in the context of the proposed development.



Figure 10: CBA and ESA map from October 2025 screening tool (2023 WCBSP)

7.	Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.

The proposed Infanta residential development is situated in the 1000m Breede River estuary management buffer - Refer Figure 11. The following management objectives as stipulated in the Breede River Estuarine Management Plan might be applicable to the proposed development.

- Reduce bank de-stabilization and erosion, and habitat degradation.
- Minimise water pollution.
- Regulate recreational use in and around the estuary, including water-based and aviation activities, through effective compliance management
- Implement an estuary zonation plan that directs infrastructural development and other land use practices (e.g. agriculture) within the various development setback lines/buffer zones
- Ensure that all proposed developments within the development buffer zones adhere to the EIA process.

The development will be located behind a delineated erosion setback line. It is not foreseen that the development will produce any significant water pollution. The development area has been earmarked within the municipal plans for development.

The development falls inside the 100m coastal setback line, the coastal management line, and the coastal protection zone - refer Figure 12. A specialist coastal setback-line assessment was undertaken to guide the development and determine an appropriate site-specific development setback. The assessment considered the stability of the rocky shoreline between 1984 and 2023, the high-water mark, the Western Cape Coastal Management Lines, projected storm-wave run-up, coastal erosion, the 100-year flood line, and projected sea-level rise of approximately 1m by 2100. The assessment found that the rocky shoreline is relatively stable, with little to no long-term erosion or accretion, although storm surges may penetrate further inland through the lower-lying stream outlet.

The specialist therefore defined the appropriate Development Setback Line (Figure 13) by combining the landward extent of the 100-year flood line with the projected 2100 coastal storm-hazard line, including a storm-hazard elevation of approximately +5m MSL. The proposed residential infrastructure will be positioned landward of this setback line and outside the area expected to be affected by flooding and coastal processes, including future sea-level rise. The proposed raised coastal walkway is the only infrastructure proposed seaward of the development setback and must be designed to accommodate occasional storm-wave run-up. For further details on the development setback line assessment refer to **Appendix G7C.**

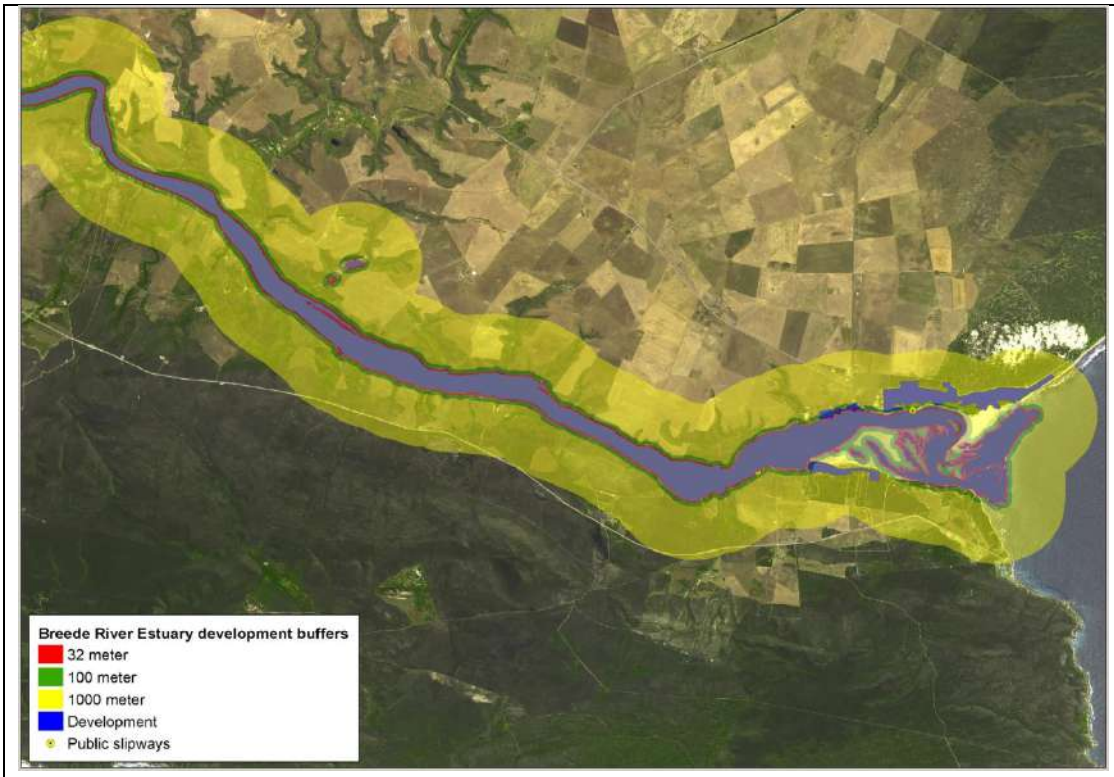


Figure 11: Breede River estuary management buffers (DEA&DP Coastal Management - https://www.westerncape.gov.za/eadp/coastal-management)



Figure 12: Overberg Coastal Management Line and Coastal Protection Zone (DEA&DP Coastal Management Map Viewer - https://gis.westerncape.gov.za/portal/apps/experiencebuilder/experience/?draft=true&id=638b806ed2354fa2b40b7101b7ecc05b)

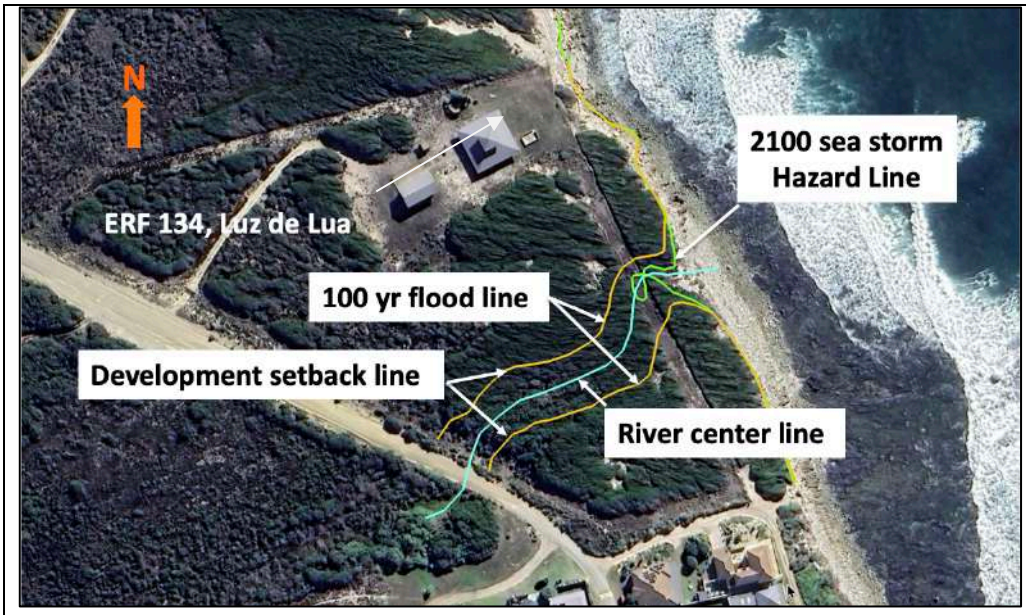


Figure 13: Development Setback Line combines the estimated 100 yr Flood and 2100 Sea Storm Hazard Lines (Specialist Coastal Engineering and Setback Line Assessment, 2026, Laurie Barwell – Laurie Barwell & Associates)

8.	Explain whether the screening report has changed from the one submitted together with the application form. The screening report must be attached as Appendix I.

The screening tool report remains the same as the one submitted together with the application form, as the site and proposed footprint has not changed. Refer Screening Tool Report attached as **Appendix I.**

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

The proposal accommodates 20 new dwellings and retains the existing dwelling, resulting in 21 residential properties on a largely undeveloped portion of Erf 134 within Infanta's urban edge, identified for residential expansion. The Growth Management Plan suggests 18 additional units; the proposed increase to 20 is motivated in the Planning Report. Residential development is concentrated in the least environmentally sensitive areas identified by specialists, while approximately 1.1ha is retained as Natural Environment Zone. The proposal uses the existing borehole BH134C, MR268 and Hoek Street access availability arrangements, and Eskom's 22kV network, supplemented by a new reservoir, bulk-water pipeline, transformer upgrade and individual wastewater-treatment systems.

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

The development will use existing borehole BH134C for water supply, supplemented by a new reservoir, bulk-water pipeline and rainwater harvesting. Access to the borehole and reservoir will use the existing access route. Access to the development site will use MR268 and Hoek Street, with the main entrance following the existing access route. Electricity will be supplied from Eskom's existing 22kV network following a transformer upgrade. Individual wastewater-treatment plants will serve the new dwellings, while the existing dwelling will retain its septic tank, reducing reliance on municipal sewerage infrastructure.

11.	Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16).

Potable water will be supplied from borehole BH134C, with treatment, storage and distribution infrastructure, while individual wastewater-treatment plants will serve the new dwellings. Municipal water and sewerage capacity is therefore not required. Eskom has confirmed electricity supply availability, subject to a transformer upgrade (**Appendix E3**).

Solid waste will be stored at an on-site collection point (new refuse area of approximately 40m²) for municipal collection and subsequent recycling or disposal. Updated municipal confirmation of sufficient, spare, unallocated solid-waste service capacity will be included / updated in **Appendix E4** with the submission of the Final Basic Assessment Report.

12.	In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K.

The need and desirability assessment considers the proposal's timing, location, environmental suitability, infrastructure requirements, socio-economic implications and alternatives, in accordance with the applicable Need and Desirability guidelines.

Planning context and need: The proposal provides 20 new dwellings while retaining the existing dwelling, resulting in 21 residential properties within Infanta's urban edge on land identified for residential expansion. It supports contained settlement growth, additional residential opportunities, temporary construction employment and expenditure, and municipal rates revenue. The increase from the Growth Management Plan's suggested 18 additional units requires consideration of the planning motivation. Identification for residential expansion does not, on its own, establish immediate housing demand.

Environmental and spatial suitability: Alternative 4 was refined through further specialist studies, authority recommendations and I&AP input. Residential development is concentrated in the least sensitive areas identified by specialists, with approximately 1.1ha of the

3.89ha site designated Natural Environment Zone. The layout incorporates a 40m ecological corridor, an 8m landscaped strip and a coastal development setback informed by the 1:100-year flood line and projected coastal hazards to 2100. Associated water infrastructure extends onto the western portion of Erf 134 and has been assessed separately.

Resources and services: Borehole BH134C's assessed sustainable yield exceeds the estimated development demand, subject to water-use requirements, treatment, abstraction controls and monitoring. Rainwater harvesting will supplement supply. Individual wastewater-treatment plants will serve the new dwellings, while the existing septic tank will remain. Electricity will use Eskom's existing network following a transformer upgrade, with provision for solar energy. Municipal solid-waste capacity confirmation remains required.

Social considerations and implementation: Development will change the site's open character and may cause intermittent construction disturbance over several years. Architectural guidelines, landscaping and EMPr controls will address visual impacts, noise, dust, traffic, wastewater, stormwater and biodiversity management. The proposed raised, wheelchair-accessible coastal walkway provides a public-access benefit. The applicant and homeowners' association will be responsible for applicable infrastructure, mitigation, monitoring and maintenance costs. The availability of a water bowser will also provide supplementary firefighting water for the development and wider Infanta community during fire emergencies.

Alternatives and conclusion: The no-go alternative would retain the existing open character and avoid development-related impacts, but would not provide the additional dwellings, construction-related benefits or proposed public walkway. Existing alien-management obligations would remain applicable. On balance, the proposal's location and specialist-informed design support its desirability, subject to the required approvals, service confirmations and effective implementation of mitigation and long-term management measures.

SECTION F: PUBLIC PARTICIPATION

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

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

Please note that a pre-application public participation period was conducted from 13 November – 12 December 2025. Refer point 2 below.

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

The pre-application draft Basic Assessment Report (1st DBAR) was made available for a 30-day commenting period from **13 November up to and inclusive of 12 December 2025**. All Organs of State were notified in terms of Section 24O (2) and (3) of NEMA to provide comment within the 30-day commenting period.

The following procedures were undertaken to notify all potential I&APs and relevant State Departments:

- Notification boards in Afrikaans and English were fixed in conspicuous locations at the site boundary.
- A notice was placed in the Langeberg bulletin, in Afrikaans and English.
- Notification letters were sent via e-mail. The following potential I&APs were notified:
    - Occupiers of land adjacent to the site,
    - Key I&APS i.e. The Ward Councillor
- The pre-app draft BAR was distributed via e-mail to the Organs of State or any State Departments with jurisdiction regarding any aspect of this application. The following departments were notified:
    - Heritage Western Cape
    - Breede-Olifants Catchment Management Agency
    - DEA: Oceans and Coast
    - Department of Environmental Affairs and Development Planning: Coastal Management
    - Department of Agriculture
    - Department of Transport and Public Works
    - Department of Environmental Affairs and Development Planning: Waste Management
    - CapeNature
    - Swellendam Local Municipality
    - Overberg District Municipality

All comments and concerns raised on the pre-application draft BAR were included in the Comments and Responses report. All documents were made available on PHS Consulting's website on 12 December 2025, and were available for review until the start of the in-process Public Participation Period (14 October 2026). All late comments were recorded and adequately addressed in the Comments & Responses Report.

NOTE: This PPP was also based on previous rounds of PPP conducted, and previous inputs / comments received.

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

Heritage Western Cape

Emily Vowles - Emily.Vowles@westerncape.gov.za

Department of Environmental Affairs and Development Planning: Coastal Management

Mercia Liddle - Mercia.Liddle@westerncape.gov.za

Ieptieshaam Bekko - ieptieshaam.bekko@westerncape.gov.za

Department of Agriculture

LUAHelpdesk@dalrrd.gov.za

Department of Transport and Public Works

Vanessa Stoffels - land.use@westerncape.gov.za

Department of Environmental Affairs and Development Planning: Development Management

Bernadette Osborne - Bernadette.Osborne@westerncape.gov.za

Melanese Schippers - Melanese.Schippers@westerncape.gov.za

Department of Environmental Affairs and Development Planning: Waste Management

Eddie Hanekom - eddie.hanekom@westerncape.gov.za

CapeNature

Rhett Smart - rsmart@capenature.co.za

Swellendam Local Municipality

Ron Brunings (Senior Manager: Town Planning, Building Control & Environment) - rbrunings@swellendam.gov.za

Overberg District Municipality

Rulien Volschenk - rvolschenk@odm.org.za

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

DEA&DP: Pollution and Chemicals Management will be consulted as part of the in-process public participation period. The outstanding comments will be included as part of the Final Basic Assessment submission to DEA&DP for decision.

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

Swellendam Local Municipality, DEA&DP: Waste Management & BOCMA will provide formal comment as part of the in-process public participation period. The outstanding comments will be included as part of the Final Basic Assessment submission to DEA&DP for decision.

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

Note: The issues listed below were raised during the previous Pre-Application PPP in October and November 2021. Additional issues raised during the November 2025 pre-application PPP were also included in this section.

Key Issues Raised during the previous Pre-Application PPP in October and November 2021:

1. Environmental Concerns

- **Critical Biodiversity Areas (CBAs)**: The Swellendam Municipality and DEA&DP emphasized the development's location within CBAs, particularly areas designated as "no-go" zones, such as the De Hoop Limestone Fynbos. Adjustments include excluding development from these high-sensitivity zones and proposing conservation measures, such as alien vegetation clearing and a biodiversity management plan.

- **Coastal Setback Lines**: DEA&DP highlighted the site's position in the Coastal Protection Zone (CPZ) and potential encroachment into the Littoral Active Zone. To address this, an erosion setback line was delineated, ensuring that no construction occurs within the dynamic coastal zone.

- **Flood Risk**: The 1:100-year floodline delineation was incorporated, and development is confined outside this zone. This minimizes risks of flooding and erosion, aligning with DEA&DP recommendations.

2. Traffic and Infrastructure

- **Increased Traffic Volumes**: The Swellendam Municipality raised concerns about the impact of additional vehicles on existing roads, particularly the poorly maintained gravel roads leading to Infanta. In response, the proposal includes upgrades to access roads to meet municipal standards, though these will remain the responsibility of the developer, not the municipality.

- **Road Layout and Maintenance**: Internal roads will be designed per the "Red Book" and municipal specifications. A Service Level Agreement will be established, ensuring road and stormwater infrastructure maintenance by the developer.

3. Sewage Management

- **Septic Tanks and Soakaways**: The Breede-Olifants Catchment Management Agency (BOCMA) opposed the septic tank systems due to pollution risks and recommended conservancy tanks. Instead, the proposal now includes individual package treatment plants for each housing unit.

- **Compliance with Water Act**: The design aligns with the National Water Act requirements, with safeguards to prevent water pollution and ensure effective sewage disposal.

4. Spatial Planning and Land Use

- **Urban Edge Compliance**: The Swellendam Municipality queried compliance with the Spatial Development Framework (SDF). The development lies within the urban edge and aligns with the SDF's guidelines for residential zoning. However, additional provisions like public parking and access roads were integrated based on feedback.

- **Subdivision and Zoning**: The land will be rezoned to accommodate residential units, private open spaces, and transportation infrastructure. Conservation zones will remain undisturbed, addressing municipal and DEA&DP concerns about sustainable land use.

5. Water Resources

- **Borehole Supply**: Groundwater abstraction was identified as a critical concern due to potential impacts on neighbouring boreholes. A geohydrological study confirmed that the borehole's sustainable yield is sufficient for the development's water needs. Regular monitoring and compliance with SANS 241 standards for water quality are planned.

- **Municipal Agreement**: A Service Level Agreement will clarify responsibilities for water supply infrastructure between the developer and the Swellendam Municipality.

6. Public Access and Amenities

- **Community Integration**: The development ensures public beach access and includes a pedestrian walkway, addressing DEA&DP's concern about equitable coastal use.

Key Issues Raised during the November–December 2025 Pre-Application PPP:

Comments from authorities and local residents informed further specialist investigations, revisions to Alternative 4 and additional management measures, as summarised below.

1.Biodiversity and Conservation - CapeNature, DEA&DP and residents questioned the age of the botanical information, impacts on CBAs/ESAs and Species of Conservation Concern, and management of alien vegetation. A new botanical assessment was completed following March 2026 fieldwork. Its findings informed the conservation areas and infrastructure mitigation, with approximately 1.1ha designated Natural Environment Zone. Alien invasive species and fire management requirements remain applicable. The removal of alien invasive species is included in the EMPr. The EMPr addressed fire management in terms of emergency response procedures. Cape Nature also requested that an initial clearing and burn should be undertaken across the property prior to the commencement of any construction activities. CapeNature's request during the previous process in 2021 related to a conservation management plan remains applicable.

2. Coastal Constraints and Flood Risk - Authorities and residents questioned the coastal setback assessment, consideration of the Coastal Management Line and future coastal hazards. A new coastal engineering assessment was completed in July 2026. The revised layout incorporates its recommended development setback, combining the 1:100-year flood line and projected 2100 coastal storm hazard line, and depicts the updated coastal delineations.

3. Groundwater and Wastewater - Residents raised concerns about groundwater availability, neighbouring boreholes and pollution from wastewater systems. The hydrogeological assessment informs abstraction limits, water treatment and monitoring requirements, supplemented by rainwater harvesting. Individual package-treatment plants are proposed for the 20 new dwellings, with treated effluent discharged to soakaways; irrigation reuse is excluded. The Geohydrological assessment was updated to include reliance of

the local community on groundwater and consideration of the package plants. Maintenance and groundwater-quality monitoring measures are required.

4. Watercourse and Pipeline Alignment - CapeNature queried pipeline disturbance within the freshwater buffer. The layout retains the 40m ecological corridor, while the pipeline alignment responds to BOCMA's recommendation to avoid the MR268 road servitude and potential maintenance damage. The remaining corridor crossing is addressed through mitigation, monitoring and rehabilitation measures.

5. Density, Layout and Settlement Character - Residents questioned the proposed dwelling numbers, erf sizes, visual impacts and compatibility with Infanta's character. Alternative 4 retains 21 residential properties but revises erf boundaries and internal roads, with most erven enlarged. Architectural and Landscaping Guidelines, height controls, the 8m heritage landscape strip and lighting restrictions address character and visual impacts. The difference from the Growth Management Plan's suggested 18 additional dwellings is addressed in the planning motivation in **Appendix G6.**

6. Traffic, Construction and Service Capacity - Residents raised concerns about road conditions, traffic, dust, noise, prolonged construction and pressure on waste services and public amenities. Traffic findings inform access arrangements, while the EMPr provides construction-management controls and ECO oversight. Eskom supply availability is confirmed; municipal solid-waste capacity confirmation remains required. Concerns about peak-season amenity pressure are addressed in the need, desirability and cumulative-impact discussion.

7. Public Access and Heritage - Coastal access concerns informed the proposed Public Open Space and raised, wheelchair-accessible walkway. Heritage concerns are addressed through retention of the existing grave, the landscaped strip and continued bulk-earthworks monitoring and reporting requirements.

8. Visual Impact and Privacy – Concerns were raised regarding the visual impact of the proposed parking area at the Southern access off Hoek Street on the erven immediately South of the street. Privacy concerns were also raised regarding potential views from the proposed development towards these existing homes. To address these concerns, the applicant has committed to installing a 2.1 m-high timber trellis along the site boundary adjacent to the parking area to provide visual screening. This is also addressed in the EMPr (**Appendix H**).

Note: All documents were made available on PHS Consulting's website on 12 December 2025, and was available for review until the start of the in-process Public Participation Period (14 October 2026). All late comments were recorded and adequately addressed in the Comments & Responses Report.

Refer to the Comment and Response Report (**Appendix F**) for individual comments, responses and outstanding confirmations.

Note:

A register of all the I&AP's notified, including the Organs of State, and all the registered I&APs must be included in **Appendix F**. The register must be maintained and made available to any person requesting access to the register in writing. The EAP must notify I&AP's that all information submitted by I&AP's becomes public information.

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

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

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

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

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

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as **Appendix G.**

1. Groundwater

1.1.	Was a specialist study conducted?	**YES X**	NO
1.2.	Provide the name and or company who conducted the specialist study.		
An initial Geohydrological assessment was conducted in 2005 by Dr Roger Parsons (Parsons and Associates) – refer **Appendix G15**. An additional Hydrogeological assessment was conducted in 2020 and updated in 2025 & 2026 by H.C. Dreyer and C. Schmidt, reviewed by Marius Terblanche – (Geo Pollution Technologies) – refer **Appendix G2**.			
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
The area surrounding Erf 134 Infanta consists of the fractured secondary Table Mountain Group aquifer. These aquifers are classified as major aquifers. Major aquifers as highly permeable formations with known or probable presence of significant fracturing. Such aquifers may be highly productive and able to support large groundwater abstraction.			
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.		
The mean groundwater level is 11m below ground level. Based on pump testing that was conducted in the production borehole on the site, a total of 32.4m^3/day can be abstracted sustainably. The borehole can support the assessed demand, subject to sustainable abstraction, treatment and monitoring requirements. The Hydrogeological report is attached as **Appendix G2**. Two boreholes (134A and 134C) are located on Erf 134. A 72-hour pumping test on borehole 134C (Van Biljon, 2014) confirmed a sustainable yield of 25m³/day, with a maximum of 48m³/day under optimal conditions. This yield exceeds the development's estimated potable demand of 16.8m³/day (±6,132m³/a). Including provision for firefighting, the total annual water demand is estimated at 7,665m³/a (21m^3/day). Borehole BH134C at the site was tested in June 2020 with a 48-hour pumping program, including a Stepped Discharge Test, Constant Discharge Test, and Recovery Monitoring, to assess its productivity and aquifer properties. The tests determined the sustainable yield, calculated using the FC-Method, at 32.4m³/day (11,826m³/year). Water quality analysis showed elevated salinity (Na, Cl, EC, TDS) typical of the Bokkeveld Group and total coliforms above operational limits, indicating microbial contamination from soil. The borehole can supply sufficient water for the development but requires treatment for potable use.			

2. Surface water

2.1.	Was a specialist study conducted?	**YES X**	~~NO~~
2.2.	Provide the name and/or company who conducted the specialist study.		
Kate Snaddon – The Freshwater Consulting Group			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		

A small ephemeral stream crosses the property, entering Erf 134 along its south-eastern border. The stream flows along the southern portion of the property before entering the sea. The stream lies in the Breede River catchment and Breede River Water Management Area.

In terms of both riparian and instream integrity, the stream is considered to be a Category A (natural) stream, as there is no significant abstraction of water from the stream, little modification to the channel and stream bed, and the surrounding vegetation is largely intact, with the exception of the section of stream flowing through Erf 134.

In terms of ecological importance and sensitivity, only the abiotic component could be assessed, placing the stream in the 'high' category. Due to its ephemeral nature, the stream is highly sensitive to changes in water quantity and quality, as any change will alter the characteristics of the stream. The stream is not highly important in terms of the provision of aquatic or semi-aquatic habitat, or as refuge for aquatic and semi-aquatic fauna and flora, due to the fact that the stream corridor is primarily a terrestrial feature, except during the days when there is flow in the stream.

In summary, the PES of the stream is Category A, while the ecological management class for the stream is Class B. Future development in the stream's catchment and management of the stream must ensure that the stream remains in its current state, with no deterioration in management class. Overall, the stream can be considered to be of very high conservation importance. Due to the largely terrestrial nature of the stream corridor, it is important to also consider the conservation importance of the surrounding dunes and vegetation, and the requirements of any fauna that may use the stream corridor for dispersal, refuge, etc.

All four development alternatives provide for a sufficient wide (40m) corridor around the watercourse. The establishment of such a corridor will protect the watercourse/stream and the surrounding dunes that contribute runoff to the stream during rainfall.



Figure 14: Watercourse applicable to study area with recommended 40m-wide corridor, comprising a 20 m buffer on either side of the centreline applied (Freshwater Impact Assessment, 2024)

See the Freshwater Specialist Report attached as **Appendix G8** for further details.

3. Coastal Environment

3.1.	Was a specialist study conducted?	**YES X**	~~NO~~
3.2.	Provide the name and/or company who conducted the specialist study.		
Laurie Barwell – Laurie Barwell & Associates.			
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		

The development falls inside the 100m coastal setback line, the coastal management line, and the coastal protection zone – refer Figure 12. However, the property in question is earmarked as part of the urban edge by the municipality. A specialist coastal setback-line assessment was undertaken to guide the development and determine an appropriate site-specific development setback. The assessment considered the stability of the rocky shoreline between 1984 and 2023, the high-water mark, the Western Cape Coastal Management Lines, projected storm-wave run-up, coastal erosion, the 100-year flood line, and projected sea-level rise of approximately 1m by 2100. The assessment found that the rocky shoreline is relatively stable, with little to no long-term erosion or accretion, although storm surges may penetrate further inland through the lower-lying stream outlet.

The specialist therefore defined the appropriate Development Setback Line (Figure 13) by combining the landward extent of the 100-year flood line with the projected 2100 coastal storm-hazard line, including a storm-hazard elevation of approximately +5m MSL. The proposed residential infrastructure will be positioned landward of this setback line and outside the area expected to be affected by flooding and coastal processes, including future sea-level rise. The proposed raised coastal walkway is the only infrastructure proposed seaward of the development setback and must be designed to accommodate occasional storm-wave run-up. For further details on the development setback line assessment refer to **Appendix G7C.**

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

The proposed Infanta residential development is situated in the 1000m Breede River estuary management buffer - Refer Figure 11. The following management objectives as stipulated in the Breede River Estuarine Management Plan might be applicable to the proposed development.

- Reduce bank de-stabilization and erosion, and habitat degradation.
- Minimise water pollution.
- Regulate recreational use in and around the estuary, including water-based and aviation activities, through effective compliance management
- Implement an estuary zonation plan that directs infrastructural development and other land use practices (e.g. agriculture) within the various development setback lines/buffer zones
- Ensure that all proposed developments within the development buffer zones adhere to the EIA process.

The development will be located behind a delineated erosion setback line. It is not foreseen that the development will produce any significant water pollution. The development area has been earmarked within the municipal plans for development.

Further to the above, the development falls inside the 100m coastal setback line, the coastal management line, and the coastal protection zone however a setback line assessment was conducted, and a development setback line was established. The development will be outside this defined development setback line. See Figure 13.

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

The July 2026 Coastal Setback Line Assessment (**Appendix G7C**) considered the Overberg coastal risk lines, shoreline stability, topography and projected storm hazards for 2030, 2050 and 2100, including 1m sea-level rise by 2100. The recommended development setback combines the 2100 sea-storm hazard line and the 1:100-year flood line and has informed the positioning of residential building footprints landward of these hazards. The site's location within the Coastal Protection Zone and its relationship to the Coastal Management Line informed the coastal assessment, retention of coastal open space and provision for public access. The site-specific setback does not replace these broader coastal planning considerations.

Coastal processes relevant to the Littoral Active Zone, including erosion, wave run-up and sediment movement, were assessed. The rocky shoreline limits erodibility, although local calcrete undercutting and collapse remain possible. These findings informed the setback and coastal walkway recommendations. It should be noted that the report does not explicitly map the Estuarine Functional Zone against the development footprint; its exclusion therefore cannot be confirmed from this assessment alone. Flooding associated with the site's drainage line is addressed through the 1:100-year flood line, while a separate 40 m-wide ecological corridor is retained.

The proposed raised coastal walkway extends seaward of the development setback and must be designed to accommodate coastal processes and specialist recommendations. Refer to Figures 6, 14 and 15 of **Appendix G7C**.

Further to the above, the Departmental Circular DEA&DP 0004/2021 (**Annexure E of Appendix F**) was considered in informing the preferred layout and associated design and management measures. Tables 2, 3 and 4 within the circular provide development considerations for Medium-Risk Urban, Low-Risk Urban and General-Risk Rural coastal areas, respectively. Relevant considerations are consolidated below, together with selected complementary principles from Table 1. These are considered alongside the site-specific coastal setback and flood assessments. These measures demonstrate alignment with the relevant coastal risk-reduction principles. Detailed building and infrastructure designs must give effect to the specialist recommendations and applicable approval conditions.



Figure 15: Erf 134 Infanta in relation to the Coastl Management Line, Overberberg protection Zone & Coastal Management Risk Zones (Low, Medium and High risk lines)(DEA&DP Coastal Management Map Viewer - https://gis.westerncape.gov.za/portal/apps/experiencebuilder/experience/?draft=true&id=638b806ed2354fa2b40b7101b7ecc05b)

Relevant guideline and reference	Development response / alignment
Prevent shoreline encroachment and associated ecological impacts (Table 1); retain indigenous vegetation and avoid interference with coastal processes (Tables 2 and 4).	Residential building footprints are positioned landward of the specialist-informed coastal development setback line. The coastal edge is retained as Public Open Space, with pedestrian movement directed along a designated raised walkway to reduce uncontrolled access and disturbance of coastal vegetation.
Preferably elevate structures on pilings, posts or similar foundations above a predetermined risk level (Tables 2, 3 and 4).	The proposed coastal walkway will be constructed on stilts, aligning with the preferred foundation approach. As it extends seaward of the development setback line, its detailed design and elevation must accommodate storm run-up and the coastal specialist's recommendations.
Consider privacy, overshadowing, visual impact and the positioning of parking, open	The Architectural and Landscaping Guidelines inform building form, scale and siting. A 2.1m-high timber trellis is proposed to screen the Southern parking area and

space and recreational areas (Tables 2 and 3).	address neighbouring privacy and visual concerns. The coastal edge is allocated to Public Open Space and public pedestrian access.
Position development to limit flood damage and risk to human life (Table 2).	The preferred layout incorporates a 40m ecological corridor centred on the drainage line. Residential building footprints are positioned landward of the coastal setback informed by the 2100 sea-storm hazard line and the 1:100-year flood line.
Provide a stormwater management plan with building plans where requested by the Municipality (Tables 2, 3 and 4).	Stormwater management is addressed in the BAR and Civil Engineering Services Report through rainwater tanks, soakaways, landscaped swales and energy-dissipating outlets. These measures provide the basis for detailed stormwater designs to accompany building plans where required by the Municipality.
Minimise hardened surfaces and promote infiltration to reduce runoff, erosion and damage (Tables 2, 3 and 4).	Building coverage is limited to 50% per residential erf. Rainwater tanks and soakaways manage roof runoff, while landscaped areas and swales intercept runoff from hardened surfaces. Energy-dissipating outlets reduce flow velocities and erosion potential.
Provide enclosed/self-contained effluent systems with suitable positioning, engineering approval and monitoring (Tables 2, 3 and 4).	Each new dwelling will be served by an enclosed wastewater package plant, with treated effluent discharged to a soakaway. This supports the enclosed-treatment principle. Detailed design must confirm suitable positioning, sealing and safety through the Registered Engineer, with operation and maintenance subject to applicable authorisation conditions and monitoring requirements.
Consolidate coastal access along raised wooden or recyclable-plastic boardwalks to reduce vegetation disturbance (Table 4; also Table 1).	The proposed wooden walkway on stilts provides a defined, wheelchair-accessible public coastal route within the Public Open Space zone. Public access is supported by the proposed right-of-way arrangements. The developer will construct the walkway, and the Homeowners' Association will maintain it.

4. Biodiversity

4.1.	Were specialist studies conducted?	**YES X**	~~NO~~
4.2.	Provide the name and/or company who conducted the specialist studies.		
Faunal Compliance Statement: Marius Burger, Sungazer Consulting (**Appendix G10**) Botanical Assessment: Dr Dave McDonald, Bergwind Botanical Surveys and Tours (**Appendix G9A**) An updated Botanical report was completed in 2026 based on a request from CapeNature, and this is included as **Appendix G9B** i.e. Plant Species and Terrestrial Biodiversity Assessment (August 2026): Dr David Hoare – BioCensus.			
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		

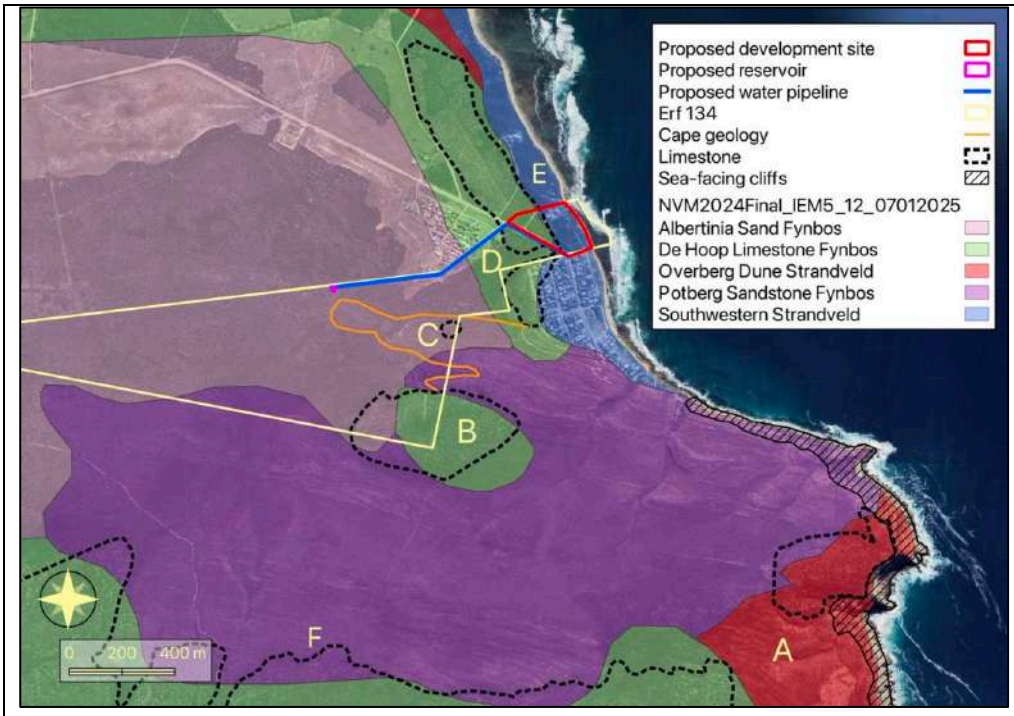


Figure 16: Regional vegetation types of the site and surrounding areas, according to the National Vegetation Map of South Africa (2024 version). The development site falls within De Hoop Limestone Fynbos and Southwestern Strandveld. The proposed pipeline alignment traverses natural vegetation associated primarily with Albertinia Sand Fynbos, however, the alignment follows an existing disturbed boundary/access corridor and therefore represents the preferred alignment from a biodiversity perspective (Plant Species and Terrestrial Biodiversity Assessment, 2026, Dr David Hoare – BioCensus)

Presence of flora and influence on the development

The August 2026 Botanical Assessment (**Appendix G9B**) identifies the following vegetation and plant features:

De Hoop Limestone Fynbos: Remnant limestone fynbos occurs on the site and is not listed as a threatened ecosystem under the November 2022 national list. The specialist recorded 35 individuals of the Endangered plant Erica oblongiflora within this habitat and recommends retaining and managing the core fynbos area.

Southwestern Strandveld: This is the vegetation unit mapped at the locality in SANBI's 2024 Vegetation Map, replacing the previous Overberg Dune Strandveld classification. The report records Southwestern Strandveld as Least Threatened, but notes that this update has not been incorporated into the published national ecosystem list, which still lists Overberg Dune Strandveld as Endangered. Much of the strandveld habitat on site is degraded, alien-invaded or transformed.

Albertinia Sand Fynbos: The water-infrastructure corridor traverses this Endangered ecosystem and remnant limestone fynbos. Three Vulnerable plant species—Agathosma muirii, Berzelia cordifolia and Gladiolus vaginatus—were confirmed along the pipeline route. The alignment largely follows an existing disturbed boundary/access corridor to limit new disturbance, subject to footprint control, rehabilitation and specialist mitigation measures.

These findings informed the retention of the core limestone fynbos habitat within the proposed Natural Environment Zone and concentration of residential development in disturbed or transformed areas. The pipeline largely follows an existing disturbed boundary/access corridor to limit new disturbance to Albertinia Sand Fynbos and plant Species of Conservation Concern. The report requires strict construction-footprint control, applicable plant permits, rehabilitation and ongoing alien invasive species management, to be incorporated into the EMPr (**Appendix H**).

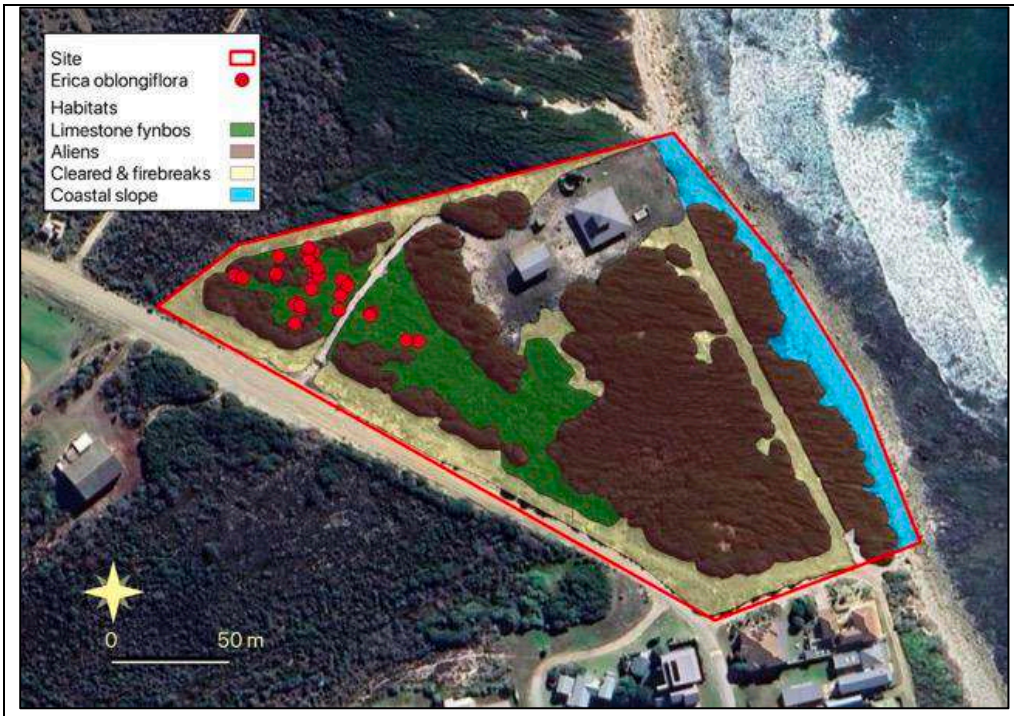


Figure 17: Location of plants of Erica oblongiflora found on site. A total of 35 Erica oblongiflora plants were found on site within the Limestone Fynbos. The preferred development footprint avoids most confirmed individuals, while the core Limestone Fynbos habitat supporting the population is retained within the conservation area (Plant Species and Terrestrial Biodiversity Assessment, Dr David Hoare – BioCensus, 2026).

The botanical assessment confirmed the following plant Species of Conservation Concern ("SCC"):

- **De Hoop Limestone Fynbos on the development site:** 35 individuals of *Erica oblongiflora* (Endangered) were recorded. Three Near Threatened species, namely *Leucadendron meridianum*, *Leucadendron muirii* and *Metalasia calcicola*, were also recorded within the Limestone Fynbos.
- **Albertinia Sand Fynbos along the bulk potable-water pipeline corridor:** *Agathosma muirii*, *Berzelia cordifolia* and *Gladiolus vaginatus*, all classified as Vulnerable, were confirmed within the affected area.

The preferred development layout avoids most of the confirmed *Erica oblongiflora* individuals and retains a substantial portion of the De Hoop Limestone Fynbos habitat within the proposed conservation area. The pipeline follows an existing disturbed boundary/access corridor through the Albertinia Sand Fynbos, thereby limiting the extent of new disturbance. The disturbance will be narrow and localised and is not expected to materially compromise the affected populations or ecological connectivity. The botanist supported the proposed development and pipeline alignment, subject to implementation of the recommended avoidance, mitigation and rehabilitation measures.

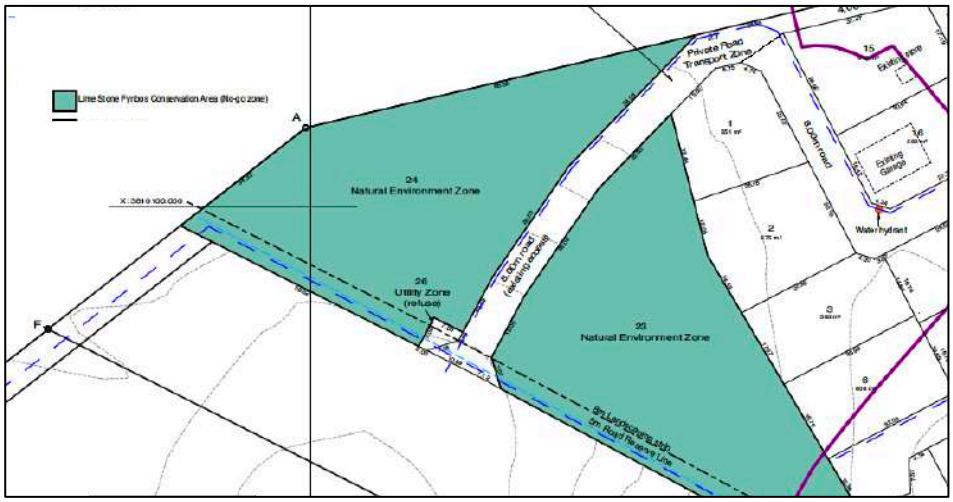


Figure 18: Preferred Alternative 4 extract depicting avoidance of the *Erica oblongiflora* individuals and retains a substantial proportion of the De Hoop Limestone Fynbos habitat within the proposed conservation area (Plant Species and Terrestrial Biodiversity Assessment, Dr David Hoare – BioCensus, 2026).

4.4.	Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.

The 2023 Western Cape Biodiversity Spatial Plan (WCBSP) identifies a coastal strip of CBA1 and a small ESA1 extending into the Northern part of the residential site. The water pipeline traverses CBA1, CBA2 and ESA1, while the proposed reservoir lies within CBA1. The WCBSP's objectives of retaining natural habitat, restoring degraded areas and maintaining ecological processes informed the specialist assessment, layout and management measures.

The botanist found that mapped CBA/ESA areas affected by the residential footprint are disturbed, alien-invaded or transformed, with no intact CBA/ESA habitat directly affected. The layout retains approximately 1.1ha as Natural Environment Zone, incorporating sensitive limestone fynbos and the 40 m-wide drainage-line corridor. The specialist also recommends rehabilitation of the coastal CBA through alien removal and restoration of ecological functions.

The water infrastructure will disturb natural vegetation within biodiversity priority areas, including Endangered Albertinia Sand Fynbos. The pipeline largely follows an existing disturbed boundary/access corridor to minimise new disturbance. The botanist considers these impacts localised and unlikely to materially compromise ecological connectivity or biodiversity targets, subject to mitigation.

Strict footprint demarcation, exclusion of unauthorised disturbance from conservation areas, rehabilitation, alien invasive species control and appropriate fire management must be implemented through the EMPr. These measures support the WCBSP objectives by avoiding sensitive habitat where practicable and limiting and rehabilitating unavoidable disturbance. They reduce impacts rather than eliminate them; the specialist assesses residual terrestrial biodiversity impacts as Very Low for the residential development and Low for the water infrastructure. Refer to **Appendix G9B** and Figure 16 -18.

4.5.	Explain what impact the proposed development will have on the site-specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development.

The Northwestern limestone fynbos conservation area, incorporating mapped ESA1 habitat, will be retained within the Natural Environment Zone and demarcated as a no-go area. A 40 m-wide ecological corridor, comprising a 20 m buffer on either side of the Southern drainage line's centreline, is incorporated to retain watercourse habitat and ecological functions.

The residential layout largely avoids the coastal CBA1. Where mapped CBA/ESA areas overlap the residential footprint, the botanist found disturbed or transformed habitat and concluded that no intact CBA/ESA habitat would be directly affected. Residual terrestrial biodiversity impacts are assessed as Very Low.

The pipeline and reservoir will affect natural vegetation within mapped biodiversity priority areas, including Endangered Albertinia Sand Fynbos. The pipeline largely follows an existing disturbed boundary/access corridor to minimise new habitat loss and fragmentation. Subject to strict footprint control, rehabilitation and alien invasive species management, the botanist assesses terrestrial biodiversity impacts as Low, without materially compromising ecological connectivity or the broader biodiversity network's functioning.

These findings informed the conservation boundaries, infrastructure alignment and EMPr mitigation requirements. Refer to **Appendix D2** for the site sensitivity plan and **Appendix G9B** for the botanical assessment.

4.6.	If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.

The proposed development is not located within a protected area.

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

A Site Sensitivity Verification (SSV) assessment was carried out by the faunal specialist for the north-eastern Portion of Erf 134. The table below provides the detail of the species that were identified:

Sensitivity	Group	Taxon
HIGH/MEDIUM	Aves (birds)	*Neotis denhami* – Denham's Bustard
HIGH	Aves (birds)	*Circus maurus* – Black Harrier
MEDIUM	Aves (birds)	*Circus ranivorus* – African Marsh Harrier
MEDIUM	Aves (birds)	*Bradypterus sylvaticus* – Knysna Warbler
MEDIUM	Aves (birds)	*Turnix hottentottus* – Fynbos Buttonquail
MEDIUM	Insecta (insects)	*Aneuryphymus montanus* – Yellow-winged Agile Grasshopper
MEDIUM	Insecta (insects)	*Chrysoritis brooksi tearei* – Brook's opal
MEDIUM	Insecta (insects)	*Trimenia malagrida maryae* – Scarce Mountain Copper
MEDIUM	Insecta (insects)	Sensitive species 4*

Birds

A total of 297 bird species is expected to occur in the general region of the study area, with 157 species confirmed in the same pentad (3425_2050) as the study area (SABAP2). Of the bird species recorded in pentad 3425_2050, 17 species are considered species of conservation concern (SCC). These include seven Near Threatened (NT) species, five Vulnerable (VU) species, and five Endangered (EN) species.

None of these SCC were observed during the July 2010/23 site surveys.

The seven NT species are *Thalassarche cauta* (Shy Albatross), *Microcarbo coronatus* (Crowned Cormorant), *Grus paradisea* (Blue Crane), *Phoenicopterus roseus* (Greater Flamingo), *Certhilauda* brevirostris (Agulhas Long-billed Lark), *Ardenna* grisea (Sooty Shearwater), and *Campethera notata* (Knysna Woodpecker). The five VU species are *Neotis denhami* (Denham's Bustard), *Morus capensis* (Cape Gannet), *Afrotis afra* (Southern Black Korhaan), Procellaria aequinoctialis (White-chinned Petrel), and Hydroprogne caspia (Caspian Tern). The five EN species are Phalacrocorax neglectus (Bank Cormorant), *Phalacrocorax capensis* (Cape Cormorant), *Circus maurus* (Black Harrier), *Spheniscus demersus* (African Penguin), and *Stercorarius antarcticus* (Brown Skua). The STR listed an additional two bird SCC, namely *Circus ranivorus* (African Marsh Harrier – EN) and *Bradypterus sylvaticus* (Knysna Warbler – VU).

Most of the bird SCC are seabirds or waterbirds. Such birds include the albatross, petrel, skua, shearwater, penguin, cormorant, tern, and flamingo. While individuals of these birds may be observed flying over the study area or close to shore, they will not utilise the study area for foraging or breeding purposes due to lack of suitable habitat. As such, they were assessed as having a zero likelihood of occurrence on site, whereas the remainder of SCC were assessed as having a low to moderate chance of occurrence.

Invertebrates

Due to the vast diversity of invertebrates, it was not feasible to compile a complete list of invertebrates on site. The species list presented in this assessment is therefore limited to four insect SCC that were identified by the STR, namely Aneuryphymus montanus (Yellow-winged Agile Grasshopper – VU), Chrysoritis brooksi tearei (Riversdal Opal – EN), *Trimenia malagrida maryae* – Scarce Mountain Copper (EN), and Sensitive Species 4. None of these SCC were observed during the July 2010/23 site surveys.

As per the SSV assessment, it was concluded that the site of the proposed development is unlikely to support any of the bird and invertebrate species of conservation concern (SCC) that were flagged by the screening tool report, nor any of the additional bird SCC that are known from the general region. The site is too small to be of any significant value to any of these bird SCC, and these all have low probabilities of utilising this site. Although the size of the site may be somewhat better suited to accommodate invertebrate (insect) SCC, the species flagged by the screening tool report are unlikely to occur at or sporadically utilise this property. The Animal Species Theme rating of MEDIUM sensitivity for this area is thus not appropriate and should instead be considered as being of LOW sensitivity in the context of these SCC. As such, it is not necessary to compile a terrestrial animal species assessment for this proposed development, and thus the specialist SSV assessment should suffice for the basic assessment process. Likewise, these results also negate the need for an impact assessment component.

In summary, this faunal assessment concludes that none of the bird and invertebrate SCC that were flagged by the screening tool report are of significance to the proposed development – and thus they do not present any constraints in the context of the proposed development. The current layout (Alt. 4) makes provision for units of undeveloped terrain (conservation areas), which to some degree will

allow for ecological functioning to be maintained. Additionally, the general habitat management recommendations and mitigation measures as per the botanical assessment (**Appendix G9B**) and incorporated in the EMPr must be complied with.

NOTE: The 2025 and the 2021 Screening tool report are included in **Appendix I**. The latest SSV (**Appendix K**) is based on the 2025 Screening tool report. Previous specialist reports contain information related to the 2021 Screening tool report, where appropriate.

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.
All impacts to watercourse features associated with the site have been dealt with in the previous section. The proximity of the site to the ocean and the Breede River Estuary and how this has influenced the proposed development has been addressed in section 3.5 of this report.

6. Heritage Resources

6.1.	Was a specialist study conducted?	**YES X**	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
• Heritage Statement & Letter (September 2010 & December 2016)): Nicolas Baumann, assisted by Emmylou Rabe (**Appendix G11A**). • Heritage Specialist Confirmation Letter (October 2024): Nicolas Baumann (**Appendix G11B**). • Archaeological Impact Assessment (August 2010, May 2011 & October 2012): David Halkett & Jayson Orton – ACO Associates (**Appendix G12**).			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		

A Notification of Intent to Develop was submitted to Heritage Western Cape ("HWC") in September 2010, after which a Heritage Statement and Archaeological Impact Assessment were undertaken. The heritage process and subsequent consideration by HWC in terms of the amended development layouts are summarised below:

- **August 2010 - Archaeological Impact Assessment:** The assessment confirmed that archaeological material was widespread across the site but is concentrated at three shell-and-artefact accumulations identified as CI03, CI16 and CI18. As no archaeological sites had previously been documented at Infanta, these deposits were considered to be of high significance, while the sandy conditions also indicated the potential presence of pre-colonial burials within the development footprint. Archaeological excavations/shovel testing was therefore recommended to determine the content, depth and extent of the three deposits and establish whether mitigation, conservation or amendments to the proposed layout would be required.
- **September 2010 – Heritage Statement:** The assessment concluded that the site's heritage significance, excluding potential archaeological resources, was low. The principal considerations related to visual impacts, the coastal edge and potential archaeological resources. The recommended mitigation included an approximately 8 m-wide landscaped setback along the main access road, the retention of natural open-space corridors and buffers, and further archaeological testing.
- **2 December 2010 – HWC Final Comment:** HWC endorsed the findings and recommendations of the Heritage Statement and Archaeological Impact Assessment and confirmed that the proposed 24-erf development could proceed, subject to Phase 2 archaeological work (excavations) and monitoring of all bulk earthworks. Refer **Appendix E1A.**
- **May 2011 - Archaeological Impact Assessment (Follow-Up Assessment & Excavations/Shovel Testing):** The follow-up assessment entailed excavations & shovel testing to evaluate the content, depth and extent of the 3 shell and artefact accumulations around Ci03, Ci16 and Ci18 in order to assess if mitigation or conservation is required. Given the poor condition of the shellfish at CI16 and lack of other suitable organic material, it was recommended that no date be run for this site. However, the other two sites, CI03 and CI18, should be radiocarbon dated in order to properly set them into their regional context, allow better interpretation and increase the overall value of the mitigation project to other researchers working in the area.
- **13 June 2012 – HWC Decision:** Following the archaeological excavations, HWC again confirmed that the development could proceed. The conditions included radiocarbon dating of material recovered from sites CI03 and CI18, monitoring of all bulk earthworks and submission of a monitoring report. Refer **Appendix E2.**
- **October 2012 - Archaeological Impact Assessment (Final Assessment & Radio-Carbon Dating):** The final assessment documented the test excavations and mitigation of the three Later Stone Age shell-and-artefact scatters at CI03, CI16 and CI18, including analysis of the recovered shellfish and stone artefacts. Radiocarbon dating of marine shell produced calibrated ages of approximately 1200 BC for CI03 and 2500 BC for CI18; CI16 was not dated due to surface contamination and mole activity but was considered likely to be of a similar age. The report concluded the archaeological mitigation phase and recommended that development may proceed, subject to HWC's remaining conditions, including archaeological monitoring during earthworks because the possibility of unmarked burials could not be excluded.
- **12 December 2012 – HWC Final Excavation Decision:** After considering the final excavation results, HWC confirmed that no further archaeological studies were required and that the archaeological mitigation investigations had been concluded, subject to the continuing monitoring and reporting requirements listed in the 2010 decision. Refer **Appendix E1B.**
- **7 December 2016 – Heritage Specialist Letter:** The original heritage specialist informed Heritage Western Cape of minor amendments to the previously approved layout and access arrangements, reducing the development from 24 to 21 erven while retaining the established road, coastal and drainage-feature setbacks. It concluded that the revised layout continued to address the heritage mitigation requirements and would not affect any identified heritage resources. HWC was therefore requested to confirm that its previous approval remained applicable and that no further heritage studies were required.
- **21 April 2017 – HWC Confirmation of Amended Layout:** HWC considered the revised layout, which reduced the development from 24 to 21 residential erven and introduced minor access amendments. HWC confirmed that its Final Comment dated 2 December 2010 remained applicable, that the proposed deviations would not result in additional heritage impacts and that the development could proceed subject to the existing archaeological conditions associated with radiocarbon dating and earthworks monitoring requirements. It should however be noted that the radiocarbon dating has been completed and is contained in the 2012 Archaeological Impact Assessment report. Refer **Appendix E1C.**
- **31 October 2024 – Heritage Specialist Confirmation Letter:** The original heritage specialist reviewed the further revised layout, including amendments to Erven 14–16, the internal road and the pedestrian footpath. The specialist confirmed that the applicable setbacks and protected areas remained unchanged and that the amendments would not affect the identified heritage resources. HWC was therefore requested to confirm that its previous approval remained applicable and that no further heritage studies were required.
- **9 March 2026 – HWC Confirmation:** HWC reviewed the revised SDP and formally confirmed that it was substantially in accordance with its approvals dated 2 December 2010, 13 June 2012 and 21 April 2017. HWC concluded that no further action in terms of section 38 of the NHRA was required at that stage, subject to radiocarbon dating of material from CI03 and CI18, monitoring of all bulk earthworks and submission of the required monitoring report. It should however be noted that the radiocarbon dating has been completed and is contained in the 2012 Archaeological Impact Assessment report. Clarity and confirmation related to this requirement will be requested from HWC during subsequent public consultation periods. Refer **Appendix E1D.**

The latest amended SDP, dated September 2026, will also be submitted to HWC for consideration during the in-process PPP. Please refer to **Appendix G11A** for NID & **Appendix E1-4** for HWC formal record of decisions.

Heritage Statement

There are only two structures built on the property, a modern house with a dominant central lantern, and an unattached garage. There are thus no built structures on the site which could be considered to have heritage significance.

The immediate context is typical of 1950s coastal holiday architecture, and, apart from a relative consistency in massing and form, and what in most instances could be regarded as an appropriate built form response to a coastal setting, could not be considered to have heritage significance.

The only distinctive natural feature in an otherwise flat and sloping landscape is the relatively shallow natural drainage feature which bisects the two land parcels.

The social focus and central point of gravity of the village is an open space system, in the form of a village green, located adjacent to the slipway in the centre of the older village.

The only aspect of heritage significance related to the site and its immediate environs is the relatively open, natural and undisturbed nature of the site and the sensitivity of the coastal zone.

Provision has been made for a landscaped strip of land adjacent to the main access road of approximately 8 metres, with guidelines to ensure appropriate boundary walls and to ensure that the immediately adjacent erven do not present their rear elevations to the main access road into the village. An aspect of this landscaped strip should be the retention of the high point of the site, at the southern tip and immediately adjacent to the existing residential area to the south-east as a natural green area. Further, sufficient set-back lines should be established along the natural drainage feature to ensure sufficient views across the site to the sea.

See the Heritage Statement attached as **Appendix G11A & B** for further details.

Archaeological assessment

Due to the sensitive nature of undisturbed coastal location, the Archaeological Contracts Office at UCT was appointed to conduct an archaeological survey and to determine whether any archaeological resources were evident on the site.

Marine shell deposits were evident across the site but represented very ephemeral sites with little or no significance. Three localities did, however, reveal denser surface accumulations of shellfish and artefactual material which appeared to mark sites of more frequent activity and occupation.

The archaeological report further stated that due to the prevailing sandy conditions and the pre-colonial signature on the landscape there is the possibility that precolonial burials could be located within the development footprint.

The report recommended that shovel testing be undertaken to evaluate the content, depth and extent of the three accumulations identified in **Figure 19** below (indicated with yellow dashed lines) in order to assess if mitigation or conservation is required and/or to determine to what extent planning could be modified to avoid impacting the material. As burials may be present, the necessary protocols should be in place for dealing with the remains, particularly during the construction phase of the project. The excavation report was submitted to HWC.

See the Archaeological Assessment **Appendix G12** for further information pertaining to excavation results & radiocarbon dating.



Figure 19: The location of archaeological occurrences on the site where shovel tests were conducted (indicated in yellow dashed lines), (David Halkett & Jayson Orton – ACO Associates).

7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.
Refer Section 6 above.

8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.

The following information has been taken from the Social Impact Assessment report (**Appendix G13**).

The village of Infanta is located within Ward 3 of the Swellendam Local Municipality (SLM). Ward 3 includes a large area, in which the Infanta area is anomalous in that the majority of homes are holiday homes owned by people that live outside of the SLM.

The demographic data should therefore be viewed within the context that the coastal village of Infanta is essentially a small holiday village with a small permanent population, which represents a small percentage of the total population of Ward 3 and the SLM. The majority of homeowners are White and likely to be better educated and fall in a higher income bracket than the majority of the population of Ward 3 and the SLM.

Population

According to Census 2011, the Swellendam Municipality (SLM) had a population of ~ 35 916. This population had increased to 40 211 by 2016 (Community Household Survey, 2016). Based on the 2016 Community Survey data, the population of Ward 3 was 6 633 (16% of the population of the SLM), which represents a marginal increase of 521 people from 2001. The majority of population in Ward 3 in 2016 was Coloured (78.7%), followed by Whites (13.4%) and Black Africans (7.4%). The main language spoken was Afrikaans (89.8%), followed by English (4.5%) and IsiXhosa (3.2%). The SLM SDF (2014) estimates that the permanent population of Infanta will be 286 in 2023.

In terms of age structure, 27.8% of the population were younger than 15 in 2016, compared to 26.1% in 2011. 65.8% of the population in 2016 were between the age of 18 and 64, which typically falls within the economically active age group. This is marginally lower than the figure of 66.6% in 2011. The remaining 6.4% were in the 65 and older age group compared to 7.3% in 2016 (Community Survey 2016).

Households

The total number of households in the SLM increased from 10 139 in 2011 to 11 678 in 2016. Of this total 96.0% were formal, an increase of 7.7% from 2011. The increase in population has therefore also been accompanied by increase in the number of formal dwellings. The average size of households remained the same, namely 3.4%. The number of households in Ward 3 in 2016 was 1 940. Of this total, 87.2% lived in formal dwellings (house and or semi-detached house), while 8.2% lived in informal dwellings.

Dependency ratio

The decrease in the percentage of economically active people in the economy also translated into an increase in the dependency ratio from 50.2 to 52.0 in 2016. The rate is however predicted to move towards 49 by 2023 (IDP, 2017-2022). The increase in the dependency ratio reflects greater pressure on the working age portion of the population (15-64), which has negative social, economic and labour market implications.

Household income

The poverty gap indicator produced by the World Bank Development Research Group measures poverty using information from household per capita income/consumption. This indicator illustrates the average shortfall of the total population from the poverty line. This measurement is used to reflect the intensity of poverty, which is based on living on less than R3 200 per month (R 38 400 per annum) for an average sized household. Based on this measure, in the region of 54.6% of the households in Ward 3 live close to or below the poverty line. Of this total 3.8% of households indicated that they had no form of formal income. The low-income levels in Ward 3 reflect the limited formal employment opportunities in the area the dependence on the seasonal tourism and agricultural sector. The low-income levels are a major concern given that an increasing number of individuals and households are likely to be dependent on social grants. The low-income levels also result in reduced spending in the local economy and less tax and rates revenue for the district and local municipality.

Education levels

Based on the 2016 Community Survey, 3.7% of the population over the age of 20 in the SLM had no formal education, down from 5.4% in 2011. In addition, the percentage of the population over the age of 20 with matric increased significantly from 20.7% in 2011 to 32.0% in 2016. The figures for Ward 3 were 5.3% with no education and 18.6% with matric (Community Household Survey 2016). This reflects the rural nature of Ward 3 and the reduced opportunities in terms of access to good education facilities, especially for farm children.

The SLM contributed 13.0% (R1.730 billion) to the ODM economy in 2015. The GDP growth averaged 4.8% per annum over the period 2005 –2015, which was significantly above the District average of 4.0%. The growth after 2008 financial crisis was 3.7%, which was also higher than the District average of 3.0%. The SLM employed 13.0% (16 330 labourers) of the Overberg District's labour force in 2015, with employment growth averaging 2.4% cent per annum since 2005, which was above the overall district employment growth rate of 2.2% per annum for the same period. The SLM has however experienced job losses (especially in the agriculture, forestry and fishing sector) prior to and during the recession. Despite this approximately 3 635 (net) additional jobs were created since 2005.

Primary Sector

Agriculture, Forestry and Fishing

In terms of sectors, the Agriculture, Forestry and Fishing sector made up 11.2% (R193.9 million) of the SLM GDP in 2015. The sector employed 19.4% of the work force in the SLM. This figure has contracted by 2.6% per annum for the period 2005 –2015, which is a key concern, specifically when compared to the other sectors in the economy. The labour force in the primary sector is characterised by a relatively large proportion of unskilled labour, with 61.8% falling within the low-skill sector. The semi-skilled sector employs only 17.3%, while the skilled sector employs the remaining 3%. The informal sector makes up 17.9% of the industry's workforce and was the only

sector to experience long-term growth (0.9% per annum) over the period 2005 –2015. Since 2010 growth in the informal sector has grown at 3% per annum.

Secondary Sector

Manufacturing

The manufacturing sector contributed 8.7% (R150.8 million) towards the Municipality's GDP in 2015, and experienced growth of 5.2% per annum on average over the period 2005 –2015. GDP growth post 2010 has also been good, averaging at 4.5% for period 2010 – 2015. In terms of employment the manufacturing industry employed 4.9% of the Municipality's workforce. Most of the workers fall within the semi-skilled category (48.9%), followed by the low-skilled (23.2%) and the skilled category (10.1%). A further 17.8% operate within the informal sector, which recorded the best growth of 5.2% average growth from 2005 –2015.

Construction

The construction sector made up 5.1% (R87.5million) of the Municipality's GDP in 2015, making it the smallest sector in the region. However, despite this construction has been the fastest growing industry since 2005, with growth averaging 8.5% per annum. Growth in the sector did however slow to 4.6% for the post financial crisis period 2010–2015. In terms of employment the sector employed only 6.6% of the Municipality's workforce. In terms of categories, 34.8% were semi-skilled, followed by low-skilled with 14.3% and skilled, 4%.

Tertiary Sector

Commercial Services

The commercial services encompass the wholesale and retail trade, catering and accommodation, transport, storage and communication and finance, insurance, real estate and business services industries. This sector contributed 55% (R951.8million) to the municipal GDP, making it the largest contributor. The industry grew strongly over the period 2005 –2015, at an annual average of 6.1%, compared to the overall municipal average of 4.8%. The sector also performed relatively well in the post-recessionary period continuing to grow at a rate of 5.1% per annum on average, making it the fastest growing sector since 2010. In terms of employment, the commercial services employed 43.9% of the municipality's workforce, making it the largest employer in the SLM.

Most of the work force are semi-skilled (35.3%), followed by 15% who are low skilled and 13.6 % classified as skilled. The low-skilled/semi-skilled/skilled workforce has shown moderate growth both prior to and post-recession. Informal employment within the commercial services industry makes up 36.1% of the industry's workforce and has experienced robust growth of 12.5% per annum since 2005 and lower but still strong growth of 6.4% per annum between 2010 and 2015.

Government and Community, Social and Personal Services

The general government & community, social and personal services contributed 18.4% (R 317.5 million) to the municipal GDP in 2015, making it the second biggest sector in the SLM. The industry experienced growth of 4.0% per annum over the period 2005-2015.This fell to 3.5% per annum since 2010. In terms of employment, the sector employs 24.8% of the workforce, making it the second largest employer. Employment growth over the period 2005 –2015 averaged 4.1% per annum. The majority (34.9%) of the workforce are classified as low skilled, followed by 22.7 in the skilled category and 21.5 % in the semi-skilled category.

Employment Profile

In terms of employment, the sectors that contributed most to employment in the SLM in 2015 were wholesale and retail trade, catering and accommodation (27.4%) Finance, insurance, real estate, and business services sector (19.7%) Community, social and personal services sector (17%). These three sectors accounted for over 64.1% of the employment opportunities within the SLM. However, only the agriculture, forestry, and fishing sector and mining and quarrying sectors continued to shed jobs after the recession but at a higher rate. The greatest number of jobs created between 2004 and 2015 in the SLM has been due to growth within the wholesale and retail trade, catering and accommodation and the finance, insurance, real estate, and business services sector.

Sectoral employment

According to the 2012-2017 SLM IDP, 73% of the SLM population may be classified as unskilled (SLM; 2012). The largest employer in Ward 3 is the Agricultural sector, which accounts for 38% of the formal employment in the area. This corresponds to the Swellendam Municipal area as a whole. This sector is followed by the Community Services sector (15%), the Community Services sector (4.2%), and the Wholesale and Retail Trade sector (13%).

The SIA addendum (**Appendix G13B**) notes that the percentage of resident owners had increased since the 2015 SIA. This trend has increased since Covid. The figure reported in the 2015 SIA was 20% permanent residents, this is now closer to 30%. The increase in the number of permanent residents will not have a material bearing on the findings of the 2015 SIA.

(Refer **Appendix G13A & B** for more details).

8.2.	Explain the socio-economic value/contribution of the proposed development.

Construction Phase: The building contractors and sub-contractors appointed to construct the houses are likely to be based in Swellendam and Bredasdorp, as there are no businesses in Infanta. The majority of the building supplies are also likely to be sourced from local building suppliers based in Swellendam and Bredasdorp for the same reason. The proposed development will therefore benefit local businesses in the SLM area.

Note: The majority of the employment opportunities that accrue during the construction phase are frequently regarded as temporary employment. However, while these jobs may be classified as "temporary" it is worth noting that the people employed in the construction industry by its very nature rely on "temporary" jobs for their survival. In this regard "permanent" employment in the construction sector is linked to the ability of construction companies to secure a series of temporary projects over a period of time. Each development, such as the proposed development, therefore, contributes to creating "permanent" employment in the construction sector.

Operational Phase: The proposed additional houses will require ad hoc potential services and materials for maintenance and operation during its lifetime. These services and materials will also be sourced from the SLM area and benefit local businesses. The availability of a water bowser will also provide supplementary firefighting water for the development and wider Infanta community during fire emergencies.

8.3.	Explain what social initiatives will be implemented by the applicant to address the needs of the community and to uplift the area.

- The building contractors and sub-contractors appointed to construct the houses are likely to be based in Swellendam and Bredasdorp. The majority of the building supplies are also likely to be sourced from local building suppliers based in Swellendam and Bredasdorp. The proposed development will therefore benefit local businesses in the SLM area. The Infanta residents currently enjoy access to the coastline over and along the Easterly fenceline and over Erf 134. The proposed SDP acknowledges this continuous need for coastal access and incorporates a walkway along the same route.
- The availability of a water bowser will also provide supplementary firefighting water for the development and wider Infanta community during fire emergencies.

8.4.	Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development.

Potential short-term impacts on people's health and wellbeing:

- Security and safety impacts associated with the presence of construction workers;
- Risk of veld fires associated with construction related activities;
- Noise, dust and safety impacts associated with construction vehicles.

Nuisance factors such as noise and dust have been mitigated in the EMPr. The EMPr also addresses security of the site, safety impacts associated with the presence of construction workers and fire prevention.

The impact of the sense of place was assessed as part of the Social Impact Assessment report and the Heritage Impact Statement. Further the architectural guidelines have made specific recommendations with relation to the building styles, and the SDP incorporates the 8m landscaped setback, the drainage line buffer area, the conservation areas and the coastal access walkway.

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. Details of the alternatives identified and considered

1.1.	Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred property and site alternative.

The preferred property/site alternative is Erf 134. There are no other property or site alternatives investigated.

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

Not applicable.

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

The preferred property/site alternative is Erf 134. There are no other property or site alternatives investigated.

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

Not applicable.

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

No alternative properties or sites were considered, as the Applicant proposes residential development on its own property and does not own other properties in the area. Site selection was also informed by Infanta's urban edge, which encompasses the proposed development portion of Erf 134. Residential development West of MR268 was therefore not considered a feasible site alternative, as that land falls outside the urban edge.

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

No alternative properties or sites were investigated. The following positive and negative impacts therefore relate to the proposed development on the selected site, Erf 134, Infanta.

Positive impacts:

- Residential development within Infanta's urban edge, avoiding expansion of the residential footprint into land outside the urban edge.
- Retention and management of the Northwestern limestone fynbos conservation area and ecological corridor through the proposed Natural Environment zoning.
- Formalisation of public coastal access through the proposed coastal Public Open Space and raised walkway.
- Temporary construction employment and expenditure on local and regional goods and services.

Potential negative impacts:

- Loss or disturbance of indigenous vegetation and faunal habitat within the development and associated infrastructure footprints.
- Potential impacts on the drainage line, groundwater and coastal environment through erosion, stormwater runoff and wastewater seepage.
- Increased groundwater demand and potential drawdown associated with borehole abstraction.
- Changes to the site's open character, visual amenity and sense of place.
- Construction-related noise, dust and traffic, and increased operational demand on roads and waste-management services.

The potential negative impacts will be mitigated through implementation of the proposed avoidance, mitigation and management measures outlined in the BAR and EMPr, including conservation areas, the ecological corridor, coastal setbacks and specialist recommendations.

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

Provide a description of the preferred activity alternative.

The proposal entails the rezoning and subdivision of an approximately 3.89ha portion of Erf 134 (85.6ha), Infanta, to facilitate a residential development. The portion will be rezoned from Agricultural Zone (AZ) to Subdivisional Area, comprising Residential Zone 1 (RZ1), Public Open Space (POS), Private Open Space (PrOS), Natural Environment Zone (NEZ), Utility Zone (UZ), Transport Zone 1 (TZ1 – Private Road) and Transport Zone 2 (TZ2 – Provincial/Public Road). The application is made in terms of section 15(2) of the Swellendam Municipal By-law on Land Use Planning, 2020, read with section 3 of the Swellendam Municipality Integrated Zoning Scheme, June 2020, and will permit the development of 20 additional single residential dwellings in accordance with the proposed layout plan presented in this application.

Provide a description of any other activity alternatives investigated.

There was no other feasible activity alternatives investigated.

Provide a motivation for the preferred activity alternative.

The activity alternative is preferred because the site is located within the demarcated urban edge of Infanta and has been earmarked for urban expansion, residential development in particular. No feasible activity alternative exists.

Provide a detailed motivation if no activity alternatives exist.

There are no other activity alternatives considered because the site has been earmarked for urban development. The site is zoned as Agriculture Zone 1.

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

The residential development and associated infrastructure may result in the following impacts:

Positive impacts

- Temporary construction employment and expenditure on local and regional goods and services.
- Additional residential opportunities and municipal rates revenue.
- Formalised public coastal access through the proposed wheelchair-accessible walkway and pedestrian access to the coastline.
- Management and rehabilitation of designated conservation areas, including alien invasive vegetation control.

Negative impacts

- Loss or disturbance of vegetation.
- Disturbance of fauna and habitat through construction.
- Potential watercourse and groundwater pollution from construction activities, stormwater and wastewater-system failures.
- Groundwater drawdown risk associated with abstraction.
- Increased runoff and erosion risk.
- Construction noise, dust, traffic and safety risks, potentially recurring as individual dwellings are built.
- Changes to visual character and sense of place risk.
- Increased demand on waste services, roads and public amenities, particularly during peak occupancy.
- Increased risks of alien invasive species spread and veld fires.

Alternative 4 incorporates conservation areas, buffers, coastal setbacks and stormwater and other management controls to avoid or reduce these impacts. The no-go alternative would avoid the additional development-related impacts and retain the existing open character, but would not provide the additional residential opportunities, construction benefits or proposed coastal walkway. Existing alien vegetation management obligations would remain applicable. The potential negative impacts will be mitigated through implementation of the proposed avoidance, mitigation and management measures outlined in the BAR and EMPr, including conservation areas, the ecological corridor, coastal setbacks and specialist recommendations.

1.3.	Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts

Provide a description of the preferred design or layout alternative.

Alternative 4 (Residential Development): This is the preferred alternative presented in the second DBAR, refined following further specialist studies, authority feedback and recommendations, and I&AP input. It comprises 21 residential erven, retaining the existing dwelling on a separate erf and providing 20 additional dwellings: 15 single-storey and five double-storey.

This alternative makes provision for:

- A 40m-wide ecological corridor, comprising a 20m buffer on either side of the ephemeral drainage line's centreline.
- A Northwestern limestone fynbos conservation area, retaining the existing access route through this area. Together with the ecological corridor, approximately 1.1ha will be zoned Natural Environment Zone.
- An 8m landscaped strip along the Western boundary, as recommended by the heritage specialist.
- The updated coastal development setback line, informed by the July 2026 coastal assessment, with residential building footprints positioned landward of this line.
- Approximately 3 439m² of coastal Public Open Space, accommodating a raised, wheelchair-accessible walkway approximately 2 m wide and 195m long.
- Water supply from existing borehole BH134C, via a proposed 140 m³ reservoir (approximately 144m² footprint) and an approximately 1 090m-long, 125mm-diameter bulk potable-water pipeline, with associated treatment and distribution infrastructure.
- A 5m³ rainwater-harvesting tank and an individual wastewater-treatment plant at each new dwelling. The treatment plants occupy approximately 2.42m² each (48.4m² combined), excluding associated soakaways. The existing dwelling retains its septic tank.
- Vehicular access from the existing MR268 entrance and Hoek Street, with internal roads approximately 4.5m wide within 8m road reserves, zoned Transport Zone 1.
- Electricity supply from Eskom's existing 22kV network, a transformer upgrade and internal electrical reticulation, with provision for solar energy at each dwelling.
- Associated stormwater infrastructure, firefighting water provision and an on-site solid-waste collection point.

- The following amendments were incorporated during the evolution from Alternatives 1 and 2 to Alternative 3:
- The main vehicular entrance serving 16 residential erven was repositioned to the existing MR268 access point, following the existing access route.
- Secondary access options serving the five Southern erven were considered; the current layout provides access from Hoek Street.
- Erf configuration and internal roads were revised to address urban-design and geometric-layout concerns, including those raised during public participation.
- Residential erven were moved outside the 40 m ecological corridor, increasing the area allocated to the open-space system.
- Building footprints were revised to respond to the coastal specialist's recommended setback.
- A pedestrian connection was added between the Northern residential component and the coastline.

The following further amendments distinguish Alternative 4 from Alternative 3:

- Minor revisions were made to internal roads and erf boundaries, enlarging most residential erven while retaining the two access arrangements.
- The potable-water pipeline was realigned outside the MR268 road servitude, following BOCMA's recommendation to avoid damage during road maintenance.
- Approximately 1.1ha of conservation land was formalised through Natural Environment zoning, and the ecological corridor was refined.
- The layout was updated to depict and respond to the revised coastal development setback, Coastal Management Line and high-water mark.
- The coastal Public Open Space and proposed wheelchair-accessible walkway were depicted in greater detail.
- Proposed stormwater outlet structures within the ecological corridor were added, subject to specialist mitigation requirements.
- The 50m-radius circles were removed for drawing clarity.
- Inclusion of servitude areas (borehole, reservoir and access road) West of the MR268.
- Further refinement of access to Erf 201 & beach access.
- Inclusion of detail on servitude areas East of MR268.

See **Appendix B4A** for the preferred Alternative 4 layout.

Alternative 4 (Bulk Water Pipeline & Reservoir): The preferred reservoir and pipeline design forms part of Alternative 4. Water will be supplied from existing borehole BH134C to a proposed 140m³ reservoir, with an approximately 144m² footprint, located near the borehole on the Western portion of Erf 134. The reservoir will provide storage for domestic supply and firefighting.

An approximately 1 090m-long, 125mm-diameter bulk potable-water pipeline will connect the supply infrastructure to the residential development. The alignment follows an existing disturbed boundary/access corridor and is positioned outside the MR268 road servitude in response to BOCMA's recommendation to avoid damage during road maintenance. A 6m-wide pipeline and right-of-way servitude is proposed.

The latest botanical assessment specifically evaluates the preferred pipeline and reservoir. Although the infrastructure affects natural Albertinia Sand Fynbos, mapped CBA/ESA areas and plant species of conservation concern, the narrow alignment limits additional disturbance. Plant-species and terrestrial biodiversity impacts are assessed as Low, conditional on strict footprint control, required permits, rehabilitation and ongoing alien-vegetation management. Refer to **Appendix B4B** for the preferred reservoir & pipeline layout and **Appendices G8** and **G9B** for mitigation requirements.

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

Residential Development

Alternative 1: This alternative comprises 23 residential erven, with 16 single-storey and seven double-storey dwellings. It was developed through an iterative process informed by specialist baseline studies and their identified opportunities, constraints and recommendations. The layout accommodates part of the De Hoop Limestone Fynbos conservation area, a 40m ecological corridor and the original coastal setback proposed by Pieter Badenhorst. Although assessed by specialists, it was considered unacceptable from a botanical perspective because it encroached into the recommended conservation area. See **Appendix B1**.

Alternative 2: This alternative comprises 21 residential erven, retaining the existing dwelling on a separate erf and providing 20 additional dwellings: 15 single-storey and five double-storey. It accommodates the 40m ecological corridor, Northwestern limestone fynbos conservation area, 8m landscaped strip and coastal specialist's recommended setback. Two access points were proposed following traffic specialist input; however, the roads authority did not support these access positions, necessitating further layout revisions. See **Appendix B2**.

Alternative 3: This alternative was presented as preferred in the first DBAR. It retains the 21 residential erven and dwelling mix of Alternative 2 but revises access, erf configuration, internal roads and the potable-water pipeline alignment. The main entrance serving 16 erven was relocated to the existing MR268 access, following the existing route, with secondary access serving five Southern erven

from Hoek Street. Residential erven were positioned outside the 40m ecological corridor, while the limestone fynbos conservation area, 8m landscaped strip and then-applicable coastal setback were retained. A pedestrian connection to the coastline was also included.

Alternative 3 was subsequently refined into **Alternative 4** following further specialist studies, authority recommendations and I&AP input. Revisions include enlarged residential erven, minor internal-road changes, pipeline realignment following BOCMA input, formalised Natural Environment zoning, updated coastal delineations, more detailed coastal walkway provision and inclusion of stormwater outlets. Alternative 3 is therefore no longer preferred. See **Appendix B3**.

Bulk Water Pipeline & Reservoir

Alternative pipeline routes and reservoir configurations were investigated. An earlier pipeline alignment crossed MR268, entered the development and turned South to cross the drainage line centrally within the site. This crossing was not supported because it encroached into the previously delineated coastal and erosion setback area. The route was consequently revised to turn South immediately after crossing MR268 and follow the road reserve, avoiding the central crossing.

During a WULA-related site visit, BOCMA recommended positioning the pipeline outside the MR268 road servitude to prevent damage during road maintenance. The alignment was subsequently shifted outside the road reserve and is presented as the preferred route under Alternative 4 (**Appendix B4B**).

The reservoir options comprised a 130 kℓ reservoir near BH134A and a 140 kℓ reservoir near BH134C. Although the civil engineering report recommended 130 kℓ for domestic demand and firefighting storage, the current proposal provides 140 kℓ near the selected supply borehole, BH134C. This arrangement provides additional storage capacity required for domestic supply and firefighting, including the proposed fire-response bowser.

Provide a motivation for the preferred design or layout alternative.

Alternative 4 is preferred because it refines the previous layout following further specialist studies, authority recommendations and I&AP input. It retains approximately 1.1ha as Natural Environment Zone, including the limestone fynbos conservation area and 40m ecological corridor, while concentrating residential development in the least environmentally sensitive areas identified by specialists. The layout retains the 8m landscaped strip and incorporates the updated coastal development setback.

The main entrance serving 16 residential erven uses the existing MR268 access and route, with access to the five Southern erven from Hoek Street. These arrangements address the roads authority's objections to earlier access positions. Minor road and erf-boundary revisions refine the layout, while the bulk-water pipeline alignment responds to BOCMA's recommendation to avoid the MR268 road servitude. The layout also provides for coastal Public Open Space, a raised wheelchair-accessible walkway and specialist-informed stormwater infrastructure.

The preferred water-supply design provides a 140 m³ reservoir near the selected supply borehole, BH134C, for domestic supply and firefighting storage. Its location links storage infrastructure to the selected water source, while the increased capacity relative to the earlier 130 m³ option provides additional storage for firefighting and to accommodate the fire-response bowser. The approximately 1 090 m-long, 125 mm-diameter bulk potable-water pipeline follows an existing disturbed boundary/access corridor to limit additional disturbance. Earlier alignments were revised to avoid the central drainage-line crossing within the previously delineated coastal and erosion setback area. The preferred alignment also lies outside the MR268 road servitude, following BOCMA's recommendation to reduce the risk of damage during road maintenance. Although the pipeline and reservoir affect sensitive vegetation and mapped biodiversity areas, the botanical assessment rates the associated plant-species and terrestrial biodiversity impacts as Low, subject to strict footprint control, required permits, rehabilitation and ongoing alien vegetation management.

The preferred design therefore responds to the identified environmental constraints and servicing requirements. Potential negative impacts will be mitigated through implementation of the measures outlined in the BAR, specialist reports and EMPr.

Refer to **Appendix B4A**, the roads authority's letter (**Appendix E2**) and the traffic assessments (**Appendices G14A and G14B**).

Provide a detailed motivation if no design or layout alternatives exist.

Layout alternatives are discussed above.

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

Planning design and development phase				
Impact (after mitigation)	**Alternative 1**	**Alternative 2**	**Alternative 3**	**Alternative 4 (Preferred)**
Damage the soil structure and destroy or shade out plants growing in and around the stream.	Negligible	Negligible	Negligible	Negligible
Pollution of the stream corridor through leakage of fuels, oils, etc. from construction machinery.	Low negative	Low negative	Low negative	Low negative
Destruction or deterioration of freshwater habitat as a result of foot and vehicular traffic.	Negligible	Negligible	Negligible	Negligible
Disturbance of freshwater fauna and flora due to light and noise pollution.	Low negative	Low negative	Low negative	Low negative

Introduction and spread of alien invasives – top material brought onto the site, for filling and landscaping can lead to the introduction of alien or invasive seed banks.	Low to Medium negative	Low to Medium negative	Low to Medium negative	Low to Medium negative
Employment and business opportunities during the construction phase.	Medium positive	Medium positive	Medium positive	Medium positive
Risks posed by presence of construction workers, including petty theft and crime.	Low negative	Low negative	Low negative	Low negative
Potential risk to the area's natural resources, such as poaching etc.	Low negative	Low negative	Low negative	Low negative
Increased risk of veld fires.	Low negative	Low negative	Low negative	Low negative
Potential noise, dust and safety impacts associated with movement of construction related traffic to and from the site.	Low negative	Low negative	Low negative	Low negative
Impact on vegetation and botany	High negative	Low negative	Low negative	Low negative
Impact of rising main on botany in conservation area	N/A	High negative	Low negative	Low negative
Traffic Impacts during construction	Low negative	Low negative	Low negative	Low negative

Operation phase				
Impact (after mitigation)	**Alternative 1**	**Alternative 2**	**Alternative 3**	**Alternative 4 (Preferred)**
Disturbance of on-site and adjacent fauna due to the presence of residential units and their occupants.	Low negative	Low negative	Low negative	Low negative
Development of open space impacting the movement and health of fauna and flora.	Low negative	Low negative	Low negative	Low negative
Pollution of the watercourse and coastline from stormwater.	Low negative	Low negative	Low negative	Low negative
Pollution of the watercourse, groundwater and coastline through on-site treatment of wastewater.	Low negative	Low negative	Low negative	Low negative
Increased volumes of runoff negatively impacting the hydrology of the coastline.	Low negative	Low negative	Low negative	Low negative
Abstraction of water from groundwater resources with risk of drawdown of local water table.	Low negative	Low negative	Low negative	Low negative
Disturbance of fauna and flora through noise light and trampling.	Low negative	Low negative	Low negative	Low negative
Introduction and spread of alien invasives through landscaping activities and gardening.	Low negative	Low negative	Low negative	Low negative
Clearing alien vegetation from the site.	Negligible	Negligible	Negligible	Negligible
Creation of opportunities for new homeowners	Medium positive	Medium positive	Medium positive	Medium positive
Impact on sense of place	Low negative	Low negative	Low negative	Low negative
Impact on amenities	Low positive	Low positive	Low positive	Low positive
Impact on vegetation and botany	Low negative	Low negative	Low negative	Low negative
Impact of rising main on botany in conservation area	N/A	Low negative	Low negative	Low negative
Traffic Impacts during operation	Low negative	Low negative	Low negative	Low negative

1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred technology alternative:

The applicant is proposing the use of individual package treatment plants to treat the household sewage as the primary option for treatment of sewage.

Preferred option for treatment of sewage

The preferred option for the treatment of sewage is household package treatment works. The selected package is the Maskam Water ™ Fusion Series Treatment System. The smallest available model is the ZF450 which has a capacity of 1 500l/day which is well in excess of the expected 640 l/day of sewage. The system has a length of 2 160mm by 1 120mm wide by 1 580mm in height (2.16m x 1.12m x 1.58m). This equates to a footprint of approximately 2.42m² per unit, or approximately 48.4m² collectively for the 20 units. It draws 58 watts of electrical power.

The system requires a 6 monthly service. Owing to the distances from major centres the Homeowner's Association must schedule the servicing so that as many as possible are serviced by one visit of the technician and staff.

The wastewater package treatment plants will treat sewage to standard limits before the treated effluent is discharged into soakaways, in line with the common practice for residences in the Infanta area.

Each proposed Maskam Fusion wastewater treatment unit incorporates a sedimentation chamber that separates and retains solids (sludge) and fats/grease (scum) from incoming wastewater. Suspended solids are further captured within the biological treatment chambers, with backwashed material returned to the sedimentation chamber for further digestion. As with centralised treatment plants, accumulated sludge requires periodic removal as part of servicing. Removal is generally only required every 4–6 years under normal operating conditions and may extend to approximately 10 years with seasonal occupation, subject to actual sludge accumulation and the manufacturer's maintenance requirements. Removed sludge will be collected by a suitable service provider and transported to a facility authorised to receive it.

Provide a description of any other technology alternatives investigated.

The alternative option for treatment of the household sewage is by making use of septic tanks and soakaways.

Alternative option for treatment of sewage

It is well known, and stated by the Red Book (2004), that the performance of septic tanks is determined by the permeability of the receiving soil. For this reason, and to thoroughly consider any potential pollution risks, the civil engineer commissioned a report by Parsons & Associates Specialist Groundwater Consultants to determine the risk of the septic tanks and soakaway system. The report is site specific and considers the area around Erf 134 such as the Infanta Village and the Infanta Park, as well as the nearby ocean. The Report is attached as **Appendix G5**.

Key aspects of the Parsons (2020) report are:

i. The proposed number and low density of septic tanks is less than currently the case in the Village and at Infanta Park;

ii. The proposed soakaways are further from the existing boreholes at the Village than the soakaways already in the Village;

iii. The boreholes used to supply water to Infanta Park and those to be used to supply the proposed development are distant (more than 450m) and upgradient of the planned septic tanks. Both considerations render it impossible for the planned septic tanks to impact the water supply and the groundwater users; and

iv. Three independent site-specific hydrogeological investigations in and around Infanta have reached the same conclusions.

Parsons & Associates Specialist Groundwater Consultants (2020) concluded that: "*Based on a consideration of existing knowledge and a review of the risk of impacting other water users or the environment, it is motivated that the use of septic tanks with soakaways be the preferred means of managing sewage to be generated at the proposed development. This motivation is based on worldwide experience in the use of septic tanks, local research and site-specific experience and observations*".

The recommendation for the usage of septic tanks and soakaways was based upon the distance from other wastewater treatment options (conservancy tanks, Swellendam Wastewater Treatment Works), the regular maintenance requirements of micro-package plants, and the perfect efficacy of the existing septic tanks in the area. Due to the costs associated with private collection from conservancy tanks (as there is no municipal collection in the area) this option was scoped out early in the planning phase due to excessive costs (area remote and far from service centres).

Provide a motivation for the preferred technology alternative.

Individual Maskam Fusion package-treatment plants with associated soakaways are preferred because they provide on-site wastewater treatment without requiring connection to a municipal sewerage system. The selected units have sufficient capacity for the anticipated household wastewater volumes and can accommodate periods of low or no inflow associated with seasonal occupation.

The package-treatment plants provide treatment before effluent is discharged to soakaways and respond to the Municipality's lack of support for the septic-tank alternative. Although treated effluent could potentially be reused with suitable infrastructure and approvals, reuse is not included in the current design and is therefore not relied upon as a motivation for selecting this alternative.

The preferred technology remains dependent on correct installation, regular servicing and maintenance to minimise groundwater and surface-water pollution risks. The systems must be positioned outside the 40 m ecological corridor and operated in accordance with the specialist recommendations and mitigation measures outlined in the BAR and EMPr.

Provide a detailed motivation if no alternatives exist.

There are two alternatives for treating and disposal of household sewage:

1. Preferred option is by making use of individual package treatment plants to treat the household sewage as the primary option for treatment of sewage.

2. The alternative option for treatment of the household sewage is by making use of septic tanks and soakaways. This alternative option has been discarded.

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

Preferred alternative: Individual package-treatment plants with soakaways

- **Positive:** Provides on-site sewage treatment, reducing reliance on municipal sewerage infrastructure.
- **Negative:** Nutrients in infiltrating effluent may contaminate groundwater and subsequently enter the drainage-line corridor, affecting water quality and habitat. Poor maintenance or treatment failure may increase pollution risks.

Discarded alternative: Septic tanks and soakaways

- **Positive:** Provides on-site sewage management without requiring municipal sewerage infrastructure.
- **Negative:** Seepage may introduce nutrients into groundwater and the drainage-line corridor, affecting water quality and ecological functioning.

For both options, the freshwater specialist requires systems outside the 40m ecological corridor, regular inspection and maintenance, and no direct discharge to the watercourse or coastline or use of effluent for irrigation. The assessment does not provide separate technology-specific ratings; the combined operational stormwater and wastewater impact is rated Low to Medium negative before mitigation and Low negative after mitigation. Refer to **Appendix G8**.

In addition to the above, the August 2026 Hydrogeological Study (**Appendix G2**) identifies on-site wastewater treatment and disposal as the primary potential source of groundwater contamination associated with the development. Although the proposed package plants are designed to produce effluent complying with the DWS General Standards, residual microbiological contaminants and nutrients may infiltrate the aquifer through the soakaways, particularly given the permeable sandy soils and relatively shallow groundwater. Package plants therefore require effective operation and maintenance rather than being regarded as eliminating groundwater-contamination risk. The specialist recommends six-monthly servicing, regular inspection of treatment units and soakaways, prompt rectification of failures and ongoing groundwater-quality monitoring. With these measures, the assessed groundwater-contamination significance and risk is reduced to acceptable levels. These findings informed the selection and management of the package-plant alternative, instead of the septic-tank and conservancy-tank alternatives.

1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred operational alternative.

There are no operation alternatives for this proposal. The proposed development is for a housing development.

Provide a description of any other operational alternatives investigated.

There are no operation alternatives for this proposal.

Provide a motivation for the preferred operational alternative.

There are no operation alternatives for this proposal.

Provide a detailed motivation if no alternatives exist.

The proposal is for a residential development and therefore operational alternatives are not applicable.

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

There are no operation alternatives for this proposal.

1.6.	The option of not implementing the activity (the 'No-Go' Option).

Provide an explanation as to why the 'No-Go' Option is not preferred.

The No-Go Option would retain the existing Agricultural zoning, dwelling and associated infrastructure, without implementing the proposed rezoning, subdivision and residential development. Existing permissible agricultural uses would remain applicable. This option would preserve the site's open character and avoid additional construction disturbance, resource demand and development-related impacts. It would not preclude future applications, and the landowner's existing alien invasive vegetation management obligations would remain.

The No-Go Option is not preferred because the site falls within Infanta's urban edge on land identified for residential expansion, subject to detailed environmental and planning investigations. The Growth Management Plan identifies two conceptual development areas with a suggested collective provision of 18 additional dwellings. Alternative 4 proposes 20 additional dwellings and retains the existing dwelling; this difference is addressed in the planning motivation. The layout incorporates approximately 1.1ha of Natural Environment Zone, the ecological corridor, coastal setback and heritage landscape strip.

The social assessment estimates capital expenditure of approximately R50 million and the potential for 60–80 construction-related employment opportunities annually over five to eight years. These are indicative estimates dependent on implementation and construction phasing. Contractors, subcontractors and building suppliers in Swellendam, Bredasdorp and the surrounding region could

benefit, while ongoing property and infrastructure maintenance would provide periodic employment and purchasing opportunities. The development would also contribute to municipal rates revenue.

Benefits to the Infanta community include formalised public coastal access through a raised, wheelchair-accessible walkway, coastal Public Open Space and management of designated conservation areas through the homeowners' association. The availability of a water bowser will also provide supplementary firefighting water for the development and wider Infanta community during fire emergencies. These arrangements would not be secured through the No-Go Option. However, regional economic benefits do not remove the potential local impacts, including changes to sense of place, intermittent construction disturbance and increased pressure on resources and amenities.

On balance, Alternative 4 is preferred for its residential, public-access and economic benefits, together with its specialist-informed layout and management measures. This preference remains subject to the required approvals, service-capacity confirmations and effective implementation of mitigation, monitoring and long-term maintenance requirements.

1.7.	Provide and explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.

Four layout alternatives and the No-Go Option were considered. The layout evolved through specialist investigations, authority recommendations and I&AP input to avoid sensitive habitat where practicable, improve access and reduce infrastructure disturbance. Alternative 4 incorporates conservation areas, the ecological corridor, updated coastal setback, revised pipeline alignment and public coastal access. No additional layout alternatives beyond these four were investigated.

Individual Maskam Fusion package-treatment plants with soakaways are preferred for the new dwellings because they:

- Treat sewage before effluent is discharged underground.
- Have a compact footprint and accommodate household-scale wastewater flows.
- Are suited to intermittent occupation, according to manufacturer information.
- Are described as odourless and quiet, subject to correct installation, operation and maintenance.
- Incorporate an early-warning system for operational faults.
- Provide for six-monthly servicing under a maintenance contract, with individual units accessible for servicing and repair.

Septic tanks and soakaways were considered but are no longer proposed for the new dwellings. The existing dwelling will retain its septic tank.

The preferred system does not eliminate pollution risks. Treatment plants and soakaways must be outside the 40m ecological corridor, maintained regularly and repaired promptly when faults arise. Direct discharge to the watercourse or coastline and irrigation with treated effluent are excluded.

Remaining impacts will be managed through footprint controls, rehabilitation, groundwater monitoring, stormwater management and ongoing infrastructure maintenance. Public coastal access, conservation management and local labour and procurement where feasible will support positive outcomes. Responsibilities must be assigned to homeowners and the homeowners' association through the EMPr and operational management arrangements. Refer to **Appendices G3, G5 and G8**.

1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.

The preferred location is a 3.89 ha portion of Erf 134, Infanta, within the demarcated urban edge. No alternative properties or sites were investigated. Associated water infrastructure is located on or traverses the Western portion of Erf 134.

The preferred activity is residential development through rezoning from Agricultural Zone to Subdivisional Area and subdivision into portions zoned Residential Zone 1, Public Open Space, Private Open Space, Natural Environment Zone, Utility Zone, Transport Zone 1 (Private Road) and Transport Zone 2 (Provincial/Public Road).

The preferred layout is Alternative 4, comprising 20 new dwellings—15 single-storey and five double-storey—and the retained existing dwelling on a separate erf, resulting in 21 residential properties. The layout incorporates:

- Approximately 1.1ha of Natural Environment Zone, including the Northwestern limestone fynbos conservation area and a 40m ecological corridor along the drainage line.
- Retention of the existing access route through the Northwestern conservation area.
- An 8m landscaped strip recommended by the heritage specialist.
- The updated coastal development setback, with residential building footprints positioned landward of it.
- Coastal Public Open Space and a raised, wheelchair-accessible walkway.
- Access from MR268 and Hoek Street, internal roads and the required service infrastructure.

The preferred wastewater technology is an individual Maskam Fusion package-treatment plant with an associated soakaway for each new dwelling, subject to prescribed siting, maintenance and monitoring requirements. The existing dwelling will retain its septic tank. Refer to **Appendix B4A** for the preferred layout.

2. "No-Go" areas

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

The following no-go areas and development restrictions have informed the alternatives and preferred layout:

- **Freshwater ecological corridor:** A 40 m-wide corridor, comprising a 20m buffer on either side of the ephemeral drainage line's centreline. Residential development is excluded. Only specifically approved infrastructure, including service crossings and stormwater outlets, may occur within it, subject to specialist mitigation.
- **Northwestern limestone fynbos conservation area:** Excluded from new residential development and unauthorised disturbance. The existing access route is retained, with works restricted to the approved road footprint.
- **8 m heritage landscaped strip along MR268:** Reserved for landscaping, with residential buildings excluded.
- **Area seaward of the coastal development setback:** Residential building footprints are excluded. The proposed raised coastal walkway is subject to its approved alignment, coastal design requirements and specialist recommendations.
- **Natural vegetation outside the water-infrastructure construction footprint:** Along the pipeline route and around the reservoir, vegetation outside the demarcated work areas must be treated as no-go. Construction access, stockpiling, laydown areas and vegetation clearing must remain within approved footprints.

Refer to **Appendices D2, G8, G9B and G7C**.

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

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

The criteria are drawn from the EIA Regulations published by the Department of Environmental Affairs and Tourism (April 1998) in terms of the Environmental Conservation Act, 1989 (Act No. 73 of 1989), the latest Basic Assessment Report (BAR) template provided by DEA&DP, and the DEA&DP Guidelines for involving Biodiversity Specialists in EIA Processes, 2005. These criteria include:

Nature of the impact

This is an appraisal of the type of effect (positive or negative) the construction, operation and maintenance of a development would have on the affected environment. This description should include what is to be affected.

Extent of the impact

Extent defines the physical extent or spatial scale of the impact. The impact could:

- Site specific: limited to the site.
- Local: limited to the site and the immediate surrounding area (1-10km)
- Regional: covers an area that includes an entire geographic region or extends beyond one region to another.
- National: across national boundaries and may have national implications.

Duration of the impact

The specialist should indicate whether the lifespan of the impact would be:

- Short term: 0-5 years.
- Medium term: 5-15 years.
- Long term: beyond the operational phase, but not permanently).
- Permanent: where mitigation either by natural processes or by human intervention will not occur in such a way or in such time span that the impact can be considered transient.

Consequence of Impact

Indicate how the activity will affect the environment.

Probability of occurrence

Probability describes the likelihood of the impact occurring. The likelihood can be described as:

- Improbable/unlikely: low likelihood of the impact occurring
- Probable: distinct possibility the impact will occur
- Highly probable: most likely that the impact will occur
- Definite: impact will occur regardless of any prevention measures.

Irreplaceable loss of resources

Describes the degree to which resources will be irreplaceably lost due to the proposed activity. It can be no loss of resources, marginal loss, significant loss or complete loss of resources.

Reversibility

This refers to the degree to which an impact can be reversed.

- **Fully reversible:** where the impact can be completely reversed.
- **Partly reversible:** where the impact can be partially reversed.
- **Irreversible:** where the impact is permanent.

Indirect impacts

Indirect impacts are secondary impacts and usually occur at a different place or time. Specialists will need to elaborate on any indirect or secondary impacts of proposed activities. If there are no indirect impacts

specialist will need to briefly explain so.

Cumulative impact

An effect which in itself may not be significant but may become significant if added to other existing or potential impacts that may result from activities associated with the proposed development. Cumulative impacts prior to and post mitigation must be assessed. The cumulative effect can be:

- **Negligible:** the impact would result in negligible to no cumulative effect.
- **Low:** the impact would result in insignificant cumulative effects.
- **Medium:** the impact would result in minor cumulative effects
- **High:** the impact would result in significant cumulative effects.

Degree to which impact can be avoided

This indicates the degree to which an impact can be avoided. The degree of avoidance can either be high (impact is completely avoidable), moderate (impact is avoidable with moderate mitigation), low (the impact is difficult to avoid and will require significant mitigation measures) or unavoidable (the impact cannot be avoided even with significant mitigation measures).

Can the impact be avoided and if so, how can it be avoided (example: demarcation of no-go areas).

Degree to which impact can be managed

This indicates the degree to which an impact can be managed. The degree of management can either be high (impact is completely manageable), moderate (impact is manageable with moderate mitigation), low (the impact is difficult to manage and will require significant mitigation measures) or unmanageable (the impact cannot be managed even with significant mitigation measures).

How can the impact be managed over time (example: clearance of alien vegetation).

Residual impacts

Residual impacts are those impacts that remain following the implementation of mitigation measures. Residual impacts must be identified and discussed. If there are no residual impacts, the specialist will need to briefly explain that the activity will have no residual impacts.

Degree to which an impact can be mitigated

This indicates the degree to which an impact can be reduced. The degree of mitigation can either be high (the impact can be fully mitigated), moderate (the impact can be partly mitigated) or not mitigated at all.

Significance

Based on a synthesis of the information contained in the above-described procedure, the significance of the potential impacts can be assessed (prior and post mitigation) in terms of the following significance criteria:

- No impact
- Low negative: where it would have negligible effects, and would require little or no mitigation
- Low positive: the impact will have minor positive effects
- Medium negative: the impact will have moderate negative effects and will require moderate mitigation
- Medium positive: the impact will have moderate positive effects
- High negative: the impact will have significant effects and will require significant mitigation measures to achieve an accepted level of impact
- High positive: the impact will have significant positive effects
- Very high negative: the impact will have highly significant effects and are unlikely to be able to be mitigated adequately.

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

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

Please refer to **Appendix J** for the impacts and risks identified for each alternative.

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

1.	Provide a summary of the findings and impact management measures identified by all Specialists and an indication of how these findings and recommendations have influenced the proposed development.

Hydrogeological Assessment: findings, management measures and influence on the development

Borehole BH134C underwent a 48-hour pumping programme in June 2020, comprising stepped discharge, constant discharge and recovery monitoring. The FC-Method estimated a sustainable yield of 32.4m³/day (11 826m³/year), exceeding the development's estimated demand of 6 132m³/year. Water-quality analyses identified elevated salinity-related parameters and total coliforms exceeding applicable SANS 241 limits. Groundwater therefore requires treatment before potable use.

The aquifer has medium vulnerability, with relatively shallow groundwater and potential seawater intrusion during prolonged abstraction. A monitoring network comprising BH134C, BH134A, BH05, BH06, BH07 and BH09 is recommended to track groundwater levels and quality. Water levels must initially be monitored weekly for three months, reducing to monthly if stable, with monthly abstraction records and quarterly groundwater-quality monitoring. Parameters include major ions, pH, EC, TDS, nutrients and microbiological contaminants. Monitoring must commence before operation, with results interpreted annually by a hydrogeologist. Abstraction must be reduced if declining groundwater levels are identified, and the surrounding hydrocensus repeated every two years.

These findings support the proposed use of existing borehole BH134C, supplemented by rainwater harvesting, subject to potable-water treatment, sustainable abstraction and ongoing monitoring to protect the aquifer and neighbouring users.

Sewage treatment through individual package plants

Each of the 20 new dwellings will be served by an individual activated-sludge package wastewater-treatment plant, with treated effluent discharged to an associated soakaway. The existing dwelling and septic system will be retained. The proposed Maskam system incorporates nitrification and denitrification, underground installation and a small footprint; the manufacturer describes its operation as quiet and odourless. Effluent compliance with applicable DWS General Standards depends on correct operation and maintenance and must be verified.

The hydrogeologist identifies wastewater infiltration as the principal potential groundwater-contamination source. Residual nutrients and microbiological contaminants may reach groundwater through the permeable sandy soils. Required mitigation includes six-monthly servicing, inspection of plants, the existing septic system and soakaways at least annually, prompt rectification of failures, and resident education on chemicals that could impair biological treatment. Groundwater-quality monitoring must include wastewater-related contaminants.

These recommendations inform the preferred wastewater system's operational and maintenance requirements. Both groundwater drawdown and contamination impacts are assessed as Medium before mitigation and Low after mitigation. Refer to **Appendix G2**.

The Civil Engineering Services Report (**Appendix G3**) identifies the ZF450 as the smallest available model, with a treatment capacity of 1 500ℓ/day, exceeding the estimated 640 ℓ/day sewage flow per household. Treated effluent will be discharged to associated soakaways. The preferred system provides on-site wastewater treatment suited to the proposed development, subject to correct installation, six-monthly servicing, at least annual inspection of plants and soakaways, and groundwater-quality monitoring to minimise contamination risks.

Faunal Assessment: findings, management measures and influence on the development

As per the Faunal SSV assessment / Compliance Statement (**Appendix G10)**, it was concluded that the assessed residential site is unlikely to support the bird and invertebrate species of conservation concern identified by the Screening Tool or the additional bird species considered. Its limited extent and habitat suitability constrain its importance to these species. The specialist therefore assigns Low animal-species sensitivity and considers the Compliance Statement sufficient, without a detailed terrestrial animal-species assessment or separate impact assessment.

No species-specific layout constraints were identified. Retention of undeveloped ecological areas supports ecological functioning, and the specialist requires implementation of the botanical habitat-management and mitigation measures. Alternative 4 retains conservation areas and the ecological corridor, with management measures informed by the previous and new Botanical Assessment (**Appendix G9A & G9B**).

Freshwater Assessment: findings, management measures and influence on the development

The freshwater assessment identifies potential construction impacts from alien-plant introduction, vegetation disturbance, sediment mobilisation during pipeline trenching, and pollution from construction materials, fuels and equipment. Recommended mitigation includes demarcating sensitive areas before construction, limiting disturbance, using alien-free topsoil, controlling spills and sediment, and rehabilitating disturbed areas with botanical input.

The specialist recommends a 40m-wide ecological corridor, measured 20m on either side of the ephemeral watercourse's centreline, encompassing the 1:100-year flood line. Its width responds to the watercourse's condition, ephemeral flow, adjacent vegetation and

anticipated development impacts. This recommendation informed the exclusion of residential erven from the corridor in Alternative 3 and is retained in Alternative 4. There is no material difference between Alternative 3 & 4.

Hardening of surfaces and loss of open space may restrict ecological connectivity. Retention of the Northwestern conservation area and watercourse corridor partially mitigates this impact, although connectivity between them remains limited. Locally indigenous landscaping and avoiding fences, or designing fences to permit small-mammal movement, are recommended. The residual impact on connectivity is assessed as Medium negative.

Stormwater runoff and seepage from wastewater-treatment systems may alter the watercourse's hydrology and habitat quality, with potential cumulative effects. These impacts are assessed as Low to Medium before mitigation and Low after mitigation. Treatment plants, septic tanks and soakaways must remain outside the ecological corridor and undergo regular inspection. Treated effluent must not be discharged directly into the watercourse or coastline or used to irrigate open areas. Rainwater harvesting is recommended to reduce groundwater demand.

For pipeline works within the corridor, the specialist recommends avoiding the corridor where practicable; otherwise, minimising the working footprint, hand excavation during the dry season, prompt backfilling, avoiding predicted heavy rainfall and rehabilitation. Construction and operational management measures must be incorporated into the EMPr. Refer to **Appendix G8.**

Botanical Assessment: findings, management measures and influence on the development

The new August 2026 assessment identifies De Hoop Limestone Fynbos and Southwestern Strandveld at the residential site, and Albertinia Sand Fynbos along the bulk-water infrastructure route. Southwestern Strandveld is assessed by SANBI as Least Threatened, although the published Revised National Ecosystem List still identifies the previously mapped Overberg Dune Strandveld as Endangered. Albertinia Sand Fynbos is also Endangered.

The residential site contains 35 individuals of Erica oblongiflora, classified as Endangered, within the limestone fynbos, resulting in High plant-species sensitivity. The layout avoids most individuals and much of their suitable habitat. The specialist recommends retaining the limestone fynbos core and managing it to improve its condition. Residential impacts are assessed as Low for plant species of conservation concern and Very Low for terrestrial biodiversity. The botanist confirms that affected mapped CBA/ESA areas at the residential site are disturbed or transformed, with no intact CBA/ESA habitat affected.

The pipeline and associated infrastructure affect natural Albertinia Sand Fynbos within mapped biodiversity-priority areas. Three Vulnerable species were confirmed: Agathosma muirii, Berzelia cordifolia and Gladiolus vaginatus. Routing the pipeline along the existing disturbed boundary/access corridor limits new disturbance. Residual plant-species and terrestrial biodiversity impacts are assessed as Low, subject to mitigation.

Required management measures include:

- Restricting construction to approved footprints and protecting adjacent natural vegetation.
- Retaining the pipeline alignment along the disturbed corridor.
- Minimising vegetation clearing, soil disturbance, erosion and runoff, and rehabilitating temporary disturbance.
- Implementing an Alien Invasive Species Management Plan before, during and after construction, particularly for rooikrans.
- Clearing aliens and rehabilitating the drainage corridor, retained limestone fynbos and coastal slopes.
- Obtaining applicable CapeNature flora permits before damaging, removing or destroying listed plant species.

These findings informed the retention of botanical conservation areas and the ecological corridor, and the selection of the pipeline alignment. The specialist supports the residential development and water infrastructure subject to the specified mitigation, rehabilitation and permit requirements. Refer to **Appendix G9B**.

Social Impact Assessment: findings, management measures and influence on the development

The 2015 SIA estimated capital expenditure of approximately R50 million, with potential for 60–80 construction-related employment opportunities annually over an assumed 5–8-year construction period, approximately 70% low-skilled and 30% skilled. Local recruitment and procurement could benefit historically disadvantaged workers, contractors and suppliers in Swellendam and Bredasdorp. Operational maintenance would provide additional ad hoc employment and business opportunities.

The specialist found that residential development would not inherently undermine Infanta's character, but identified risks associated with inappropriate building scale and design, and a gated estate with controlled access. Strict architectural guidelines sympathetic to the existing settlement and avoidance of a controlled-access security estate are recommended. These findings inform the proposed architectural guidelines and provision for public coastal access.

Additional residents may increase pressure on limited swimming areas, beach space and slipway access, particularly during peak holidays. The SIA considers this pressure seasonal and does not regard it as sufficient grounds to prevent development. This finding does not imply that amenity impacts would be absent.

Recommended management measures include promoting local employment and procurement, managing construction traffic, dust, noise, fire and security risks, and incorporating the SIA mitigation measures into the EMPr. The 2023 addendum supports Alternative 3 conditionally, subject to appropriate architectural controls and implementation of mitigation. Refer to **Appendices G13A–G13C.**

Heritage Assessment: findings, management measures and influence on the development

The Heritage Statement concludes that the site has Low built-environment and cultural-landscape heritage significance, excluding archaeological resources. Visual impacts, particularly on views from the main access road, are expected to be Low with mitigation.

Recommendations include an approximately 8m-wide landscaped strip along MR268, appropriate boundary-wall treatment and building orientation, retention of natural coastal green space, and setbacks along the drainage feature to maintain views towards the sea. These measures informed the layout, with Alternative 4 retaining the landscaped strip, coastal open space and ecological corridor.

The heritage specialist's 2024 letter confirms that the layout revisions reviewed did not affect identified heritage resources, as protected areas and setbacks remained unchanged. Archaeological findings and mitigation are addressed separately. Refer to **Appendices G11A and G11B.**

Archaeological Assessment: findings, management measures and influence on the development

The initial survey identified widespread archaeological material, concentrated at CI03, CI16 and CI18, comprising shellfish remains and associated artefacts. Subsequent excavation and analysis in 2012 completed the archaeological mitigation, including radiocarbon dating of CI03 and CI18.

Test excavations indicated that further subsurface archaeology is unlikely, although unmarked pre-colonial burials cannot be excluded. The final report supports development proceeding subject to Heritage Western Cape's conditions, including monitoring during construction. These findings inform the requirement for archaeological monitoring of bulk earthworks and incorporation of archaeological protection measures into the EMPr (**Appendix H**). Refer to **Appendix G12.**

Setback Line Assessment: findings and influence on the development

The new July 2026 assessment determines a site-specific development setback combining the 2100 sea-storm hazard line, including projected sea-level rise of 1 m by 2100, and the 1:100-year flood line. The assessment considers shoreline change, erosion, topography, storm surge and wave run-up.

The setback informed the positioning of residential building footprints landward of the identified hazards, alongside retention of the 40m-wide ecological corridor. The proposed raised coastal walkway extends seaward of the setback and requires design in accordance with the specialist's coastal-hazard recommendations. Refer to **Appendix G7C**, Figures 6 and 15.

Traffic Assessment: findings, management measures and influence on the development

The Traffic Impact Statement concludes that MR268 can accommodate the additional light-vehicle traffic generated by the proposed 21 residential properties. Access spacing and sight distances for the assessed layout are considered acceptable. The March 2023 addendum confirms that the statement's conclusions and recommendations remain applicable.

Authority feedback informed relocation of the Northern entrance to the existing property access, serving 16 residential erven. Alternative 4 retains this access and provides access to the five Southern erven via Hoek Street. Separate accesses avoid an internal road crossing through the ecological corridor.

Recommended measures include upgrading the existing access, surfacing internal roads to limit dust, and providing parking in accordance with municipal requirements. The specialist supports the assessed development from a traffic perspective. Refer to **Appendices G14A and G14B**.

See section below for all site-specific mitigation measures proposed by specialists. All mitigation has been incorporated into the SDP (Preferred Alternative 4 i.e. **Appendix B4A**) and EMPr (**Appendix H**) as required.

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

The following mitigation measures are proposed by the Hydrogeological specialist:

- The monitoring as recommended in the Hydrogeological assessment should be established prior to operation. The water level monitoring should be conducted weekly for the first three months of operation and if no significant water level decline is observed, the monitoring can be conducted on a monthly basis. Alternatively, automatic water level measurement in the form of pressure transducers can be installed to aid in this process. Logs of flow meter readings should also be kept, and the flowmeter should also be read once per week.
- The monitoring data (water levels, rainfall and chemistry) should be kept in an electronic database for further analysis should this be required.
- The recommended pump cycle for the borehole is 12 hours per day. If the pump cycle is to be extended, the maximum daily volume for each borehole must not be exceeded and the pumping rate must be reduced to sustainable rates.
- It is recommended that the hydrocensus be repeated once every 2 years to ensure that no new groundwater users are affected. The hydrocensus should extend to a 1km radius around the site boundary.
- The regional groundwater table must be maintained to ensure that schedule 1 water users adjacent to the site have adequate water supply for basic human needs.

The following mitigation measures are proposed by the Freshwater specialist:

- Ensure that all building materials and equipment are stored at least 50m away from the watercourse corridor, as demarcated prior to construction.
- Materials should be stored in piles that do not exceed 1.5m in height and should be protected from the wind, to prevent spread of fine materials across the site.
- Any construction activities close to the stream cease during periods of heavy rain, to reduce the risks of contamination of the stream and ocean through rainfall and runoff.
- Machinery prone to oil or fuel leakage must be located at least 50m away from any sensitive ecosystem, and the area bunded in order to contain leakages.
- Water pumps and cement mixers shall have drip trays to contain oil and fuel leaks – these must be cleaned regularly.
- Suitable toilet and wash facilities must be provided to avoid the use of sensitive areas for these activities.
- The watercourse corridor must be well marked during the pre-construction phase.
- Pathways and access roads must be routed away from the stream corridor and coastline.
- The construction site and access pathways should avoid sensitive areas, which must be demarcated during the pre-construction phase. If lights are used, these should be directed away from the stream corridor and coastline.
- Any animals found during site preparation or construction must be recorded and handed to the ECO.
- An education programme for all employees must be run at the start of construction, and when new contractor teams start on site.
- All soils and top material must be bought from a reliable source and must be free of alien seeds or alien grass runners.
- The proposed stormwater management system, if implemented in full, would adequately mitigate against the negative impacts associated with the generation, storage and discharge of stormwater on the site. It is understood that all stormwater generated by the development will be minimised at the point of accumulation, with only high discharge volumes and natural runoff being directed towards the watercourse and coastline.
- The pipe carrying water under the road must be cleaned out, so that this does not pose a flood risk for the proposed development.
- Both permanent residents and occasional visitors must be encouraged to use water sparingly, as groundwater is a precious resource, and the impacts of increased abstraction relatively unknown.
- Use of rainwater must be facilitated through construction of rainwater tanks and use of rainwater encouraged.
- Only locally indigenous plants shall be allowed in gardens and landscaped areas. Grassed lawns must be of indigenous species, such as *Cynodon dactylon* (kweekgras).
- Residential and road lights should be directed away from the stream corridor and coastline.
- Residents, visitors and their pets should be discouraged from walking into and through the stream corridor. Boardwalks can be used to allow pedestrian access into the corridor, while protecting the fauna and flora.
- The stream corridor should be planted with appropriate indigenous vegetation, where necessary, and a barrier provided between landscaped areas (gardens or roadsides) and the corridor (e.g. a pathway).
- Kikuyu grass should not be allowed on the site.
- Road reserves can be grassed with indigenous species such as *Cynodon dactylon* (kweekgras).
- The spread of alien plant species into the natural areas must be prevented and monitored.

NOTE: mitigation measures linked to septic tank installation have been omitted. Preferred alternative for sewage treatment is Maskam package plant per house.

The following mitigation measures were proposed by the Botanical specialist:

- All construction-related disturbance must be restricted to the approved development and construction footprint. No unnecessary clearing, vehicle movement, material storage or other construction activities may occur within adjacent natural vegetation.
- The proposed pipeline alignment should be retained along the existing disturbed boundary/access corridor and should not be relocated into currently undisturbed natural habitat without a comparative ecological assessment.
- Construction must follow best-practice measures to minimise vegetation clearing, soil disturbance, erosion, runoff and sedimentation.
- An Alien Invasive Species Management Plan must be developed and implemented before construction and maintained during and after construction.
- All temporary disturbance associated with construction must be rehabilitated following completion of the pipeline installation, with appropriate topsoil handling and management of alien invasive species.
- A CapeNature flora permit must be obtained before any listed plant SCC are damaged, destroyed or removed, where required by applicable provincial legislation.

The following mitigation measures are proposed by the Social specialist:

- The developer must inform the local authorities, local community leaders, organizations and councillors of the project and the potential job opportunities for locals.
- The developer must establish a database of local construction companies in the area, specifically SMME's owned and run by HDI's, prior to the commencement of the tender process for the bulk services component of the project. These companies should be notified of the tender process and invited to bid for project related work.
- The developer, in consultation with the appointed contractor/s, must look to employing a percentage of the labour required for the construction phase from the local area in order to maximize opportunities for members from the local HD communities;

- In terms of the individual property owners, they are free to employ the building contractors of their choice, however the EMPr will recommend that local contractors must be employed. Given the location of Infanta the majority of property owners are likely to employ locally based building contractors.
- For the bulk services phase, the construction workers will be required to stay in a facility located to the West of the site on the developer's property during the week. No construction workers will be permitted to stay in the facility over weekends. The contractor must transport all construction workers to their homes on Friday afternoon and back to site on Monday morning. The duration of the bulk services phase will be 4-6 months.
- The facility has three rooms and an ablution room. The suitability of the facility to accommodate workers should be confirmed by the local authorities before commencement of the construction phase.
- The contractors appointed by the developer and individual homeowners must ensure that all workers employed on the project are informed at the outset of the construction phase that any construction workers found guilty of poaching and or theft will be dismissed and charged. All dismissals must be in accordance with South African labour legislation. In addition, with the exception of security personnel, no construction workers should be allowed to remain on the site over weekends. The contractor should make necessary arrangements to transport workers to and from the area on a weekly basis.
- It is recommended that the developer appoint the EIA consultants to prepare a General Environmental Management Plan (EMP) that must be implemented by all private owners.

The following mitigation measures apply to both the bulk civil component of the development and to individual homeowners:

- Contractors must ensure that open fires on the site for cooking or heating are not allowed except in designated areas.
- Contractors must ensure that construction related activities that pose a potential fire risk, such as welding etc., are properly managed and are confined to areas where the risk of fires has been reduced. Measures to reduce the risk of fires include clearing working areas and avoiding working in high wind conditions when the risk of fires is greater. In this regard special care must be taken during the high risk dry, windy summer months.
- Contractors must provide adequate firefighting equipment on-site;
- Contractors must provide fire-fighting training to selected construction staff;
- In the event of a fire being caused by construction workers and or construction activities, the appointed contractors must compensate property owners, including farmers, for any damage caused to their properties and losses incurred. The contractor should also compensate the firefighting costs borne by farmers and local authorities. Construction activities should not be permitted over weekends, specifically long weekends (such as the Easter Weekend) and the December school holidays, specifically the period 14 December to 6 January. This is to reduce the impact on those people who live in Infanta permanently and or who visit the area over weekends and holiday times.
- Construction activities during weekdays should be confined to the following hours – 07h30 and 17h30. This is to reduce the impact on the permanent residents of Infanta or and people who visit the area during the week.
- Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers.
- All vehicles must be road-worthy and drivers must be qualified, made aware of the potential road safety issues, and need for strict speed limits.
- The developer must ensure that strict design guidelines that are in keeping with the current scale of development in Infanta and are sympathetic to the local environment are attached to the deed of sale for all properties. As indicated above, Architectural Guidelines for the development have been drawn up by IG Architects and Urban Design. These guidelines appear to address the concerns raised by local residents.
- The establishment of a security type estate, with controlled access is not recommended or supported. As indicated above, the developer has indicated that public access to the area will not be controlled or restricted.
- The Infanta Ratepayers and Residents Association, in consultation with the local authorities, must investigate the need to up-grade the existing slipway and the option of developing a tidal pool.
- The SLM SDF notes that the municipality is responsible for upgrading the slipway. The Infanta Ratepayers and Residents Association, in consultation with the local authorities, must investigate the need to up-grade the existing slipway and the option of developing a tidal pool.

The following mitigation measures are proposed by the Heritage specialist:

- The provision of a landscaped strip adjacent to the main access road of approximately 8m with guidelines to ensure appropriate boundary wall treatment and to ensure that the immediately adjacent erven do not present their rear elevations to the main access road to the village.
- An aspect of this landscaped strip should be the retention of the high point of the site at the southern tip and immediately adjacent to the existing residential area to the southeast as a natural green area.
- Sufficient set-back lines should be established along the natural drainage feature to ensure sufficient views across the site to the sea.
- The band of green space in front of the existing village should be used as a guide to the establishment of the set-back line.

The following mitigation measures are proposed by the Archaeological specialist:

- Radio-carbon dating is required for sites Ci03 and Ci18 as identified in the Archaeological assessment. This has been conducted and is contained in **Appendix G12**.

- As burials may be present on the broader site, a protocol should be in place for dealing with the remains, particularly during the construction phase of the project.
- Monitoring of bulk earthworks required during constructing phase and submission of monitoring report to HWC upon completion of construction.

The following design provisions are proposed by the Traffic engineer:

- Retain and upgrade the existing Northern access to serve the 16 residential erven in the Northern portion.
- Position the Southern access opposite the existing street, as shown on the assessed layout, subject to Swellendam Municipality's approval.
- Provide access to the neighbouring houses via the Southern access and close the existing intersection of the unregistered gravel road with MR268, as proposed in the Traffic Impact Statement.
- Prevent new roads from crossing the identified conservation area and prevent hardened road surfaces within the ecological corridor.
- Ensure on-site parking complies with the Municipality's requirements.
- Surface internal roads to limit traffic-generated dust.
- Provide the proposed pedestrian walkway along the coastal frontage.

The March 2023 addendum introduces no additional mitigation measures; it confirms that the conclusions and recommendations of the 2019 Traffic Impact Statement remain applicable. These are predominantly layout and design requirements; the documents do not prescribe a separate construction traffic-management plan.

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

Mitigation measures by the Freshwater Ecologist linked to septic tank installation have been omitted. Preferred alternative for sewage treatment is Maskam package plant per new house.

All mitigation measures identified by specialists will be included as conditions for the approval and will be contained in the EMPr (**Appendix H**) for stringent implementation & monitoring.

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

The proposed development could benefit surrounding communities through 20 additional residential opportunities, temporary construction employment, local procurement and contributions to the municipal rates base. The 2015 SIA estimated 60–80 construction-related employment opportunities annually over an assumed 5–8-year period, approximately 70% low-skilled and 30% skilled. These remain indicative historical estimates. Local recruitment and procurement could benefit historically disadvantaged workers, contractors and suppliers in Swellendam, Bredasdorp and surrounding areas. Operational maintenance would create additional ad hoc opportunities.

The proposed publicly accessible, wheelchair-friendly coastal walkway would formalise pedestrian access to the coastline. The availability of a water bowser will also provide supplementary firefighting water for the development and wider Infanta community during fire emergencies. Conservation management, rehabilitation and alien-vegetation control would support the management of retained natural areas through the EMPr and homeowners' association.

Potential negative impacts include construction traffic, dust, noise, fire and security risks, and increased demand for waste collection, roads, emergency services and coastal amenities. Although municipal potable-water and sewer networks will not be used, other service-capacity requirements like waste must be confirmed. Additional residents may increase pressure on limited beach space, safe swimming areas and slipway access, particularly during peak holidays. The walkway would improve access but would not increase beach or swimming capacity.

The SIA concludes that residential development would not inherently undermine Infanta's character, subject to sympathetic building scale and design. Architectural and landscaping controls, public coastal access and implementation of construction and operational mitigation measures respond to these concerns. The specialist advises against a gated security estate with controlled access. Refer to **Appendices G13A–G13C.**

5.	Explain how the risk of climate change may influence the proposed activity or development and how has the potential impacts of climate change been considered and addressed.

Climate change may affect the proposed development through sea-level rise and coastal storms, drought and reduced groundwater recharge, intense rainfall and flooding, higher temperatures and increased wildfire risk. Extreme events may also disrupt electricity, water supply and road access. These risks have informed Alternative 4 and the proposed management measures, as discussed below.

Coastal hazards and sea-level rise

The July 2026 Coastal Setback Line Assessment (**Appendix G7C**) considers shoreline change, erosion, topography, storm surge and wave run-up, including projected hazards for 2030, 2050 and 2100 and 1 m sea-level rise by 2100. The recommended development setback combines the 2100 sea-storm hazard line and the 1:100-year flood line, replacing the earlier setback of 10 m landward of the +6 m MSL contour.

Residential building footprints are positioned landward of the recommended setback. Although the rocky shoreline limits erosion, local calcrete undercutting and collapse remain possible. Coastal vegetation and open space will therefore be retained and managed to limit disturbance and erosion. The proposed raised coastal walkway extends seaward of the development setback and must accommodate

storm run-up and the specialist's design recommendations. These measures reduce exposure to assessed hazards but do not eliminate all future coastal risk.

Drought and water security

Prolonged dry periods may reduce groundwater recharge and increase competition for groundwater. The proposal uses existing borehole BH134C, supplemented by 5 m³ rainwater-harvesting tanks at each new dwelling. Rainwater availability will also decrease during drought, making demand management essential.

Abstraction must remain within authorised and specialist-confirmed sustainable limits. Groundwater levels, abstraction volumes and water quality will be monitored, including potential seawater intrusion. Abstraction must be reduced where monitoring identifies declining groundwater levels or unacceptable impacts. Water-efficient fittings, leak detection, drought-tolerant landscaping and operational water restrictions will further manage demand. Groundwater requires treatment before potable use.

Intense rainfall, flooding and stormwater

More intense rainfall may increase runoff, erosion and damage to roads and services. The layout retains a 40m-wide ecological corridor, measured 20m on either side of the ephemeral drainage-line centreline, encompassing the assessed 1:100-year flood line.

Stormwater management provides for rainwater harvesting, infiltration and controlled discharge. Detailed design and maintenance must prevent erosion, pollution and destabilisation of the drainage corridor or coastal slopes. Construction disturbance will be minimised, exposed soils stabilised, and temporarily disturbed areas rehabilitated. Stormwater infrastructure must be inspected following major storms. Service infrastructure within the ecological corridor remains subject to specific authorisation and specialist mitigation.

Biodiversity, heat and wildfire

Retention and rehabilitation of conservation areas, coastal vegetation and the drainage corridor support infiltration, erosion control and ecological resilience. Alien invasive vegetation will be controlled, and landscaping will use locally indigenous, water-wise species. Hotter, drier conditions may increase wildfire risk at the interface between housing and natural vegetation. Fire management must include appropriately maintained firebreaks, firefighting water and equipment, emergency access and evacuation procedures, while respecting ecological requirements. The availability of a water bowser will also provide supplementary firefighting water for the development and wider Infanta community during fire emergencies.

Implementation and review

The climate-change discussion identifies these responses in relation to the Western Cape Climate Change Response Strategy: Vision 2050. Applicable measures must be secured through the engineering design, EMPr and homeowners' association management arrangements, with clear responsibilities for funding, maintenance and monitoring. Measures must be reviewed following major droughts, storms or fires and adjusted where monitoring identifies changing risks or ineffective controls.

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

There are no conflicting recommendations among the specialists. All specialists are in agreement regarding the constraints on site and how the development layout accommodates for them.

7.	Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.

The specialist findings were integrated through successive layout revisions, culminating in Alternative 4, and the selection of service infrastructure and management measures. Botanical and freshwater recommendations informed retention of the limestone fynbos conservation area and 40m ecological corridor, while coastal and flood assessments informed building setbacks. Heritage recommendations informed the 8m landscaped strip, and traffic findings informed the revised access arrangements.

Hydrogeological, freshwater and engineering findings informed sustainable groundwater abstraction, potable-water treatment, wastewater disposal, monitoring and maintenance requirements. Social findings informed architectural controls, public coastal access, local employment opportunities and construction-impact management.

These measures are incorporated into the EMPr, with responsibilities, monitoring and corrective actions for construction and operation. Where recommendations differ, the more protective measure has been adopted where practicable, including exclusion of treated-effluent irrigation of open areas. If authorised, the relevant specialist requirements should be secured through enforceable EA conditions and the approved EMPr.

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

The mitigation hierarchy was applied through specialist investigations and successive layout revisions to identify Alternative 4 as the preferred development option, as follows:

Avoid or prevent: Residential erven avoid the 40m-wide ecological corridor, while the limestone fynbos core and most identified Erica oblongiflora plants and suitable habitat are retained. Building footprints are positioned landward of the updated setback combining the 2100 sea-storm hazard line and 1:100-year flood line. The 8m landscaped strip along MR268 is retained to reduce visual impacts.

Minimise: Residential development is concentrated in previously disturbed and less sensitive areas. The bulk-water pipeline follows an existing disturbed boundary/access corridor to limit new habitat disturbance. Strict footprint control, sustainable groundwater abstraction, rainwater harvesting, wastewater treatment and maintenance, stormwater controls and construction mitigation reduce unavoidable impacts.

Rehabilitate: Temporarily disturbed areas, particularly along the pipeline route, will be rehabilitated. Alien invasive vegetation will be controlled, and retained limestone fynbos, the drainage corridor and coastal slopes managed to improve ecological condition and functioning.

Offset: The latest botanical assessment does not recommend a biodiversity offset and supports development subject to its mitigation, rehabilitation and permit requirements. Residual botanical impacts remain Low to Very Low.

Alternative 4 therefore represents the preferred practicable development option through avoidance of key constraints and management of residual impacts.

SECTION J: GENERAL

1. Environmental Impact Statement

1.1.	Provide a summary of the key findings of the EIA.

Summary of the key findings of the Basic Assessment

- The proposal entails rezoning and subdivision of a 3.89ha portion of Erf 134, Infanta, from Agricultural Zone to Subdivisional Area, accommodating Residential Zone 1, Public and Private Open Space, Natural Environment Zone, Utility Zone, Transport Zone 1 (Private Road) and Transport Zone 2 (Provincial/Public Road).
- The site lies within Infanta's urban edge, on land identified for residential expansion, subject to environmental assessment informing its scale and form.
- Alternative 4 is the preferred layout, refined following specialist investigations, authority recommendations and I&AP input. It comprises 20 additional dwellings-15 single-storey and five double-storey-plus the retained existing dwelling, resulting in 21 residential erven.
- Water supply will use BH134C, supplemented by household rainwater harvesting, with a proposed bulk pipeline and reservoir. The estimated demand of 6 132m³/year is below the assessed sustainable yield of 11 826m³/year. Groundwater requires treatment before potable use, sustainable abstraction controls and monitoring for drawdown, contamination and seawater intrusion.
- Each new dwelling will have an individual package wastewater-treatment plant and soakaway; the existing septic system will remain. Groundwater contamination risks require six-monthly servicing, at least annual inspections and groundwater-quality monitoring. Treated effluent will not be discharged directly into the watercourse or coastline or used to irrigate open areas.
- Electricity will be supplied from Eskom's existing 22kV network, with a transformer upgrade. Access will use the existing MR268 entrance and Hoek Street. Internal roads will be private; the applicable MR268 portion is proposed for transfer to the provincial roads authority. Outstanding service-capacity confirmations must be secured.

Specialist findings

- **Botanical:** The limestone fynbos supports 35 Endangered Erica oblongiflora plants. The layout retains the conservation core and avoids most individuals and suitable habitat. Residential impacts are assessed as Low for plant species and Very Low for terrestrial biodiversity. The pipeline affects Endangered Albertinia Sand Fynbos and three Vulnerable plant species within mapped biodiversity-priority areas. Its disturbed-corridor alignment, footprint controls, rehabilitation, alien management and applicable flora permits reduce residual impacts to Low.
- **Freshwater:** The ephemeral watercourse requires a 40m-wide ecological corridor, measured 20m either side of its centreline, encompassing the assessed 1:100-year flood line. Stormwater and wastewater impacts are assessed as Low to Medium before mitigation and Low afterwards; residual connectivity impacts remain Medium negative.
- **Faunal:** The assessed residential site has Low sensitivity for the species of conservation concern considered, with no species-specific layout constraints identified. Retention and management of natural areas remain relevant.
- **Coastal:** The July 2026 setback combines the 2100 sea-storm hazard line, including 1m projected sea-level rise, and the 1:100-year flood line. Residential building footprints are positioned landward of this setback. The raised coastal walkway (wooden and on stilts) will be positioned seaward of the setback line and its design should accommodate coastal processes & specialist recommendations.
- **Heritage and Archaeology:** Built-environment and cultural-landscape impacts are expected to be Low with mitigation, including the 8 m landscaped strip along MR268. Archaeological excavation and analysis were completed in 2012; possible unmarked burials require monitoring of bulk earthworks.
- **Social and Traffic:** Development could generate local employment and procurement benefits, while increasing construction disturbance and seasonal pressure on coastal amenities. The 2015 SIA's R50 million expenditure and 60-80 annual construction opportunities over 5-8 years are indicative historical estimates. Sympathetic architectural controls and public coastal access are important. The traffic assessment supports the assessed access arrangements and considers the road capable of accommodating additional light-vehicle traffic.

Protection and implementation

- Approximately 1.1ha will be retained for conservation. Protected areas include the limestone fynbos core, ecological corridor, landscaped strip and land seaward of the development setback, subject to specifically authorised infrastructure and walkway exceptions. Natural vegetation outside the approved pipeline construction footprint must also remain undisturbed.

- The findings support consideration of Alternative 4 subject to enforceable mitigation, monitoring, maintenance and approval requirements. The applicable measures must be incorporated into the EMPr (**Appendix H**) and long-term management arrangements.

1.2.	Provide a map that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2)

See **Appendix D2** for a map illustrating the development layout and environmental constraints.

1.3.	Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.

Planning design and development phase				
Impact (after mitigation)	**Alternative 1**	**Alternative 2**	**Alternative 3**	**Alternative 4 (Preferred)**
Damage the soil structure and destroy or shade out plants growing in and around the stream.	Negligible	Negligible	Negligible	Negligible
Pollution of the stream corridor through leakage of fuels, oils, etc. from construction machinery.	Low negative	Low negative	Low negative	Low negative
Destruction or deterioration of freshwater habitat as a result of foot and vehicular traffic.	Negligible	Negligible	Negligible	Negligible
Disturbance of freshwater fauna and flora due to light and noise pollution.	Low negative	Low negative	Low negative	Low negative
Introduction and spread of alien invasives – top material brought onto the site, for filling and landscaping can lead to the introduction of alien or invasive seed banks.	Low to Medium negative	Low to Medium negative	Low to Medium negative	Low to Medium negative
Employment and business opportunities during the construction phase.	Medium positive	Medium positive	Medium positive	Medium positive
Risks posed by presence of construction workers, including petty theft and crime.	Low negative	Low negative	Low negative	Low negative
Potential risk to the area's natural resources, such as poaching etc.	Low negative	Low negative	Low negative	Low negative
Increased risk of veld fires.	Low negative	Low negative	Low negative	Low negative
Potential noise, dust and safety impacts associated with movement of construction related traffic to and from the site.	Low negative	Low negative	Low negative	Low negative
Impact on vegetation and botany	High negative	Low negative	Low negative	Low negative
Impact of rising main on botany in conservation area	N/A	High negative	Low negative	Low negative
Traffic Impacts during construction	Low negative	Low negative	Low negative	Low negative

Operation phase				
Impact (after mitigation)	**Alternative 1**	**Alternative 2**	**Alternative 3**	**Alternative 4 (Preferred)**
Disturbance of on-site and adjacent fauna due to the presence of residential units and their occupants.	Low negative	Low negative	Low negative	Low negative
Development of open space impacting the movement and health of fauna and flora.	Low negative	Low negative	Low negative	Low negative
Pollution of the watercourse and coastline from stormwater.	Low negative	Low negative	Low negative	Low negative
Pollution of the watercourse, groundwater and coastline through on-site treatment of wastewater.	Low negative	Low negative	Low negative	Low negative

Increased volumes of runoff negatively impacting the hydrology of the coastline.	Low negative	Low negative	Low negative	Low negative
Abstraction of water from groundwater resources with risk of drawdown of local water table.	Low negative	Low negative	Low negative	Low negative
Disturbance of fauna and flora through noise light and trampling.	Low negative	Low negative	Low negative	Low negative
Introduction and spread of alien invasives through landscaping activities and gardening.	Low negative	Low negative	Low negative	Low negative
Clearing alien vegetation from the site.	Negligible	Negligible	Negligible	Negligible
Creation of opportunities for new homeowners	Medium positive	Medium positive	Medium positive	Medium positive
Impact on sense of place	Low negative	Low negative	Low negative	Low negative
Impact on amenities	Low positive	Low positive	Low positive	Low positive
Impact on vegetation and botany	Low negative	Low negative	Low negative	Low negative
Impact of rising main on botany in conservation area	N/A	Low negative	Low negative	Low negative
Traffic Impacts during operation	Low negative	Low negative	Low negative	Low negative

2. Recommendation of the Environmental Assessment Practitioner ("EAP")

2.1.	Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMPr

The following impact management outcomes for the proposed development are included in the EMPr.

PRE-DEVELOPMENT PHASE

a) **Site demarcation and site establishment:** the development footprint must be kept to the demarcated site area to avoid any impacts to the surrounding environment.

b) Demarcation of No-Go areas:

- 40m ecological corridor catering for a watercourse.
- Limestone Fynbos conservation area.
- 8m heritage setback line from the MR268.
- Coastal setback line, in front of which no development outside the wooden pedestrian walkway on stilts will be allowed.

c) **Access roads:** Minimise impact to the environment through only using planned access to the site.

d) **Fencing:** Ensure safe and controlled access to the site through the erection of fencing and gates where required.

e) **Site facilities:** Provide clean toilet facilities, eating areas and potable water to all staff in an effort to minimise the risk of disease and impact to the environment and health impacts.

DEVELOPMENT PHASE

a) **Workshop, equipment maintenance and storage areas:** Soil, surface water and groundwater contamination are minimized.

b) **Storage, handling, use and disposal of hazardous substances:** Safe storage, handling, use and disposal of hazardous substances.

c) **Cement / Concrete Batching:** To control concrete and cement batching activities in order to minimise spillages and contamination of soil, surface water and groundwater.

d) **General aesthetics:** Neat and well-maintained site to minimise visual impacts.

e) **Traffic accommodation:** Minimize traffic impact.

f) **Solid waste management:** Wastes are appropriately stored, handled and safely disposed of at a licensed waste facility.

g) **Hazardous waste management:** Hazardous wastes are appropriately stored, handled and safely disposed of at a licensed waste facility.

h) **Noise control:** To prevent unnecessary noise to the environment by ensuring that noise from construction activity is mitigated, as far as possible.

i) **Dust control:** Dust prevention measures are applied to minimise the generation of dust.

j) **Storm- and wastewater management:** To avoid pollution and erosion because of storm- or wastewater runoff.

k) **Topsoil use:** Impacts on the environment are minimised when topsoil is removed, and sufficient topsoil is available for rehabilitation.

l) **Stockpiling and stockpile areas:** To reduce erosion and sedimentation because of stockpiling.

m) **Protection of heritage resources (if any):** Impact to heritage resources is minimised.

n) **Emergency procedures:** Emergency procedures are in place to enable a rapid and effective response to all types of environmental emergencies.

o) **Fire Prevention:** Prevention of uncontrolled fires.

p) **Site safety and security:** All safety and security measures are in place.

q) **Public safety:** All precautions are taken where possible to minimise the risk of injury, harm or complaints.

r) **Landscaping and rehabilitation:** No environmental degradation occurs as a result of the development

2.2.	Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.

- The De Hoop Limestone Fynbos site must be set aside for conservation and must be carefully managed in the long term to ensure that alien invasive plant species are controlled and do not outcompete the sensitive fynbos. A management plan should be compiled to ensure the correct management of the conservation area of De Hoop Limestone Fynbos and the 'watercourse biodiversity corridor'. A conservation management plan that takes into account periodic fire management must be formulated for the conservation area and an initial burn must be implemented prior to construction, as recommended by CapeNature.
- The monitoring as recommended in the Hydrogeological assessment should be established prior to operation. The water level monitoring should be conducted weekly for the first three months of operation and if no significant water level decline is observed, the monitoring can be conducted on a monthly basis. Alternatively, automatic water level measurement in the form of pressure transducers can be installed to aid in this process. Logs of flow meter readings should also be kept, and the flowmeter should also be read once per month.
- Follow up sampling during use of the borehole will be required to determine the continued suitability of the water for domestic consumption. Should traces of coliforms be detected during the sampling further treatment will be required.
- The EMPr must be implemented during the construction phase.
- The pipe carrying water under the road must be cleaned out, so that this does not pose a flood risk for the proposed development.
- Use of rainwater must be facilitated through construction of rainwater tanks and use of rainwater encouraged.
- Only locally indigenous plants shall be allowed in gardens and landscaped areas. Grassed lawns must be of indigenous species, such as *Cynodon dactylon* (kweekgras).
- Residential and road lights should be directed away from the stream corridor and coastline.
- The stream corridor should be planted with appropriate indigenous vegetation, where necessary, and a barrier provided between landscaped areas (gardens or roadsides) and the corridor (e.g. a pathway).
- Kikuyu grass should not be allowed on the site.
- Road reserves can be grassed with indigenous species such as *Cynodon dactylon* (kweekgras).
- The spread of alien plant species into the natural areas must be prevented and monitored.
- For the bulk services phase, the construction workers will be required to stay in a facility located to the West of the site on the developer's property during the week. No construction workers will be permitted to stay in the facility over weekends. The contractor must transport all construction workers to their homes on Friday afternoon and back to site on Monday morning. The duration of the bulk services phase will be 4-6 months.
- In the event of a fire being caused by construction workers and or construction activities, the appointed contractors must compensate property owners, including farmers, for any damage caused to their properties and losses incurred. The contractor should also compensate the firefighting costs borne by farmers and local authorities.
- The developer must ensure that strict design guidelines that are in keeping with the current scale of development in Infanta and are sympathetic to the local environment are attached to the deed of sale for all properties. As indicated above, Architectural Guidelines for the development have been drawn up by IG Architects and Urban Design. These guidelines appear to address the concerns raised by local residents.
- The establishment of a security type estate, with controlled access is not recommended or supported. Public access to the development area will not be controlled or restricted.
- The provision of a landscaped strip adjacent to the main access road of approximately 8m with guidelines to ensure appropriate boundary wall treatment and to ensure that the immediately adjacent erven do not present their rear elevations to the main access road to the village.
- An aspect of this landscaped strip should be the retention of the high point of the site at the southern tip and immediately adjacent to the existing residential area to the southeast as a natural green area.
- All bulk earthworks must be monitored and require a monitoring report to be submitted to HWC upon completion of the project.

- Water provided for domestic use must comply with the SANS 241: 2015 guidelines for drinking water. Regular monitoring must be done to ensure compliance. Monitoring data of drinking water quality to be supplied to the development must be available upon request.
- Water tanks are required at each unit and must form part of the water infrastructure to ensure that water is used sustainably.
- The proponent must ensure that all invasive alien plants, particularly Acacia cyclops, are completely removed from the site. Ongoing monitoring must be implemented to prevent re-establishment or further invasion by such species. Additionally, the conservation area must be securely fenced to restrict access from the entrance road.
- During the 'operational' phase, residents would have access to the conservation areas. However, these areas must be strictly observed and not seen as areas for dumping of garden refuse and other waste material. The conservation areas must also be managed to foster the biodiversity and should not become 'gardens'.
- Concerns were raised regarding the visual impact of the proposed parking area at the Southern access off Hoek Street on the erven immediately South of the street. Privacy concerns were also raised regarding potential views from the proposed development towards these existing homes. To address these concerns, the applicant has committed to installing a 2.1 m-high timber trellis along the site boundary adjacent to the parking area to provide visual screening.

2.3.	Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.

The EAP is of the opinion that Alternative 4, the preferred development alternative, should be authorised, subject to the conditions outlined below. The proposal comprises 20 additional dwellings and retention of the existing dwelling on a 3.89ha portion of Erf 134, Infanta. The site falls within the demarcated urban edge and is identified for residential expansion. Alternative 4 has been refined through further specialist investigations, authority recommendations and I&AP input.

The layout concentrates residential development within the least environmentally sensitive areas and retains approximately 1.1ha for conservation. It accommodates the limestone fynbos conservation area, a 40m-wide ecological corridor along the ephemeral drainage line, the approximately 8m-wide landscaped strip adjoining MR268 and the updated coastal development setback. Residential building footprints are positioned landward of the setback informed by the 2100 sea-storm hazard line and the 1:100-year flood line.

The botanical assessment identifies residual terrestrial biodiversity impacts as Very Low for the residential development and Low for the water infrastructure, subject to mitigation. Although the pipeline traverses sensitive vegetation and mapped CBA/ESA areas, its alignment follows an existing disturbed boundary/access corridor, limiting additional disturbance. The faunal assessment identifies low sensitivity for the assessed species of conservation concern. Residual impacts remain, particularly habitat fragmentation and potential changes to runoff and water quality; these require ongoing management.

Borehole BH134C has an assessed sustainable yield sufficient to meet the estimated development demand, subject to abstraction controls, treatment and monitoring. Rainwater harvesting will supplement supply. Each new dwelling will have an individual package wastewater-treatment plant discharging treated effluent to an associated soakaway; the existing dwelling's septic system will be retained. Electricity will be supplied through the existing Eskom network, with the proposed transformer upgrade and supplementary solar provision.

The development also offers potential construction employment, local procurement and ongoing maintenance opportunities, together with formalised public coastal access. The social assessment's expenditure and employment estimates are indicative and should not be presented as guaranteed benefits.

On balance, the EAP considers Alternative 4 an acceptable development option, provided that the identified environmental constraints are respected and mitigation is implemented throughout construction and operation. Applicable conditions include:

- Development must conform to the approved Alternative 4 layout, with construction footprints and conservation boundaries demarcated before work commences.
- Conservation areas and the watercourse corridor must remain protected, except for specifically approved infrastructure and maintenance activities. Disturbance outside the approved pipeline and reservoir footprints must be prohibited.
- The approved EMPr and biodiversity management plan must be implemented, including alien-vegetation control, rehabilitation, ecological connectivity and long-term conservation management.
- Groundwater abstraction must comply with applicable authorisation limits and a specialist-confirmed pumping regime. Water levels, abstraction volumes and water quality must be monitored, with corrective action where unacceptable impacts are detected.
- Potable water must be treated and routinely tested. Wastewater systems must be appropriately maintained, with no direct effluent discharge to the watercourse or coastline.
- Stormwater infrastructure and the coastal walkway must comply with specialist design and mitigation requirements.
- Architectural and Landscaping Guidelines, the approximately 8 m landscaped strip and approved public-access arrangements must be maintained.
- Archaeological monitoring and reporting must comply with Heritage Western Cape's requirements.
- Construction compliance must be monitored by an Environmental Control Officer, and operational management responsibilities must be assigned to the Homeowners' Association.

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

ASSUMPTIONS

- All mitigation, management, and monitoring measures prescribed in this BAR and the accompanying EMPr will be implemented by the developer. Management of the site is essential, and the mitigation measures recommended by the specialists must be

implemented. This has a major bearing on the reliability of the predictions of significance of impact.

- The construction and management of this proposed activity will be in line with the recommendations in this report, which will be enforced by the implementation of the detailed EMPr. Much of the long-term success lies in the effective implementation of the measures prescribed in the EMPr.

UNCERTAINTIES

- Uncertainties result when mitigation measures are proposed and must be implemented. The management and implementation of these mitigation measures must be monitored and managed correctly to ensure that all mitigation measures identified are brought to fruition.

GAPS IN KNOWLEDGE

- At this stage there are no identified gaps in knowledge within this report.

SPECIALIST ASSUMPTIONS & LIMITATIONS

Specialist report	Assumptions & Limitations
Hydrogeological Assessment — Appendix G2	Findings depend on the reliability of available information and the agreed investigation scope. Aquifer-vulnerability calculations use estimated groundwater depth, recharge, sandy subsurface conditions and an assumed 3% gradient. Wastewater generation assumes that 80% of water consumption returns as wastewater.
Coastal Setback Assessment — Appendix G7C	Historical imagery has limited resolution, requiring interpretation and providing a broad understanding of shoreline dynamics. Hazard calculations assume a 40% reduction in vertical wave run-up because of the rocky foreshore and projected sea-level rise of 1m by 2100.
Freshwater Assessment — Appendix G8	The stream was dry during the 2010 site visit, limiting collection of water-quality and aquatic-faunal data. Good water quality and sensitive aquatic fauna were therefore assumed as a precaution.
Botanical Assessment — Appendix G9B	Rare or threatened plants may be missed despite adequate survey coverage. Southwestern Strandveld is assessed using SANBI's updated classification, which the report acknowledges has not been incorporated into the gazetted ecosystem list. No survey-timing limitation was identified.
Faunal Compliance Statement — Appendix G10	Two short winter visits informed the assessment. Non-detection does not establish definite absence of SCC. Occurrence was inferred from habitat suitability, with moderate to high confidence.
Heritage Statement — Appendix G11A	No separate assumptions-and-limitations section was identified. However, the low heritage-impact conclusion excludes potential archaeological resources, which required separate investigation.
Archaeological Assessments — Appendix G12	The final 2012 assessment considers subsurface archaeology unlikely but explicitly states that unmarked burials cannot be excluded.
Social Impact Assessment — Appendix G13A	Developer-supplied information is assumed accurate. Demographic information is dated or projection-based. Employment estimates assume construction over 5–8 years.

2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.

The EA, if granted, must be valid for at least 10 years.

An Environmental Control Officer (ECO) must be appointed to oversee the construction of the services infrastructure (including the implementation of the EMPr and any applicable conditions of the environmental authorisation). ECO monitoring (site visits) must be undertaken at least twice a month, until such time that the construction of the services infrastructure is completed.

The construction of individual houses must adhere to the requirements of the House Construction Environmental Management Plan (CEMP) included under **Appendix H** of the EMPr (**Appendix H** to the DBAR). The individual homeowners must comply with the House CEMP, and the HOA must oversee compliance with the House CEMP.

An Environmental Audit must be undertaken within 1 month of completion of the installation of services and every second year until the completion of all units on site.

3. Water

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

Water conservation and demand management will be implemented during construction and operation, recognising the Western Cape's water scarcity and the reliance of Infanta residents on groundwater. During construction, potable water use will be minimised by using harvested rainwater or other suitable non-potable water for dust suppression and equipment cleaning, where available and appropriate.

Water-saving measures will include controlled application of water, trigger-operated hoses, prompt repair of leaks and reuse of collected water where its quality permits. Contaminated wash water must be contained and may not be discharged into the drainage line, coastal environment or groundwater. These construction measures will be incorporated into the EMPr.

During operation, the following measures will reduce demand for treated potable water:

- Provide a 5 m³ rainwater-harvesting tank at each dwelling to supplement suitable non-potable uses.
- Incorporate water-efficient taps, showerheads, toilets and appliances, where feasible.
- Use locally indigenous, water-wise and drought-resilient landscaping, with minimal irrigation and no irrigation during drought periods.
- Implement leak detection, prompt maintenance and water-use monitoring and reporting.
- Apply water restrictions and demand-management measures through the homeowners' association during periods of water stress.

The current wastewater proposal provides for treatment through package plants and disposal to soakaways. Treated-effluent recycling is therefore not a confirmed component of the design, and no water-saving allowance should be attributed to it. Any future reuse would require suitable infrastructure and compliance with specialist recommendations and applicable authorisation conditions; treated effluent will not be used to irrigate open areas.

The climate-change discussion in previous sections identifies prolonged dry periods, drought and increased pressure on groundwater as material risks. Drought resilience will therefore depend on reducing demand and adapting abstraction to monitored conditions. Abstraction from BH134C will remain within authorised limits, supported by monitoring of groundwater levels, abstraction volumes and water quality against agreed trigger levels. Abstraction will be reduced or suspended if unacceptable drawdown or impacts on existing lawful users are identified. Rainwater harvesting will provide supplementary supply when rainfall is available, but cannot be relied upon during prolonged drought. The availability of a water bowser will also provide supplementary firefighting water for the development and wider Infanta community during fire emergencies. The homeowners' association will review water-management measures following major droughts and adjust them where monitoring demonstrates that existing measures are inadequate.

4. Waste

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

- Waste separation and recycling will be actively encouraged within the development, as per the EMPr.
- Any crushing and reuse of clean building rubble must fall within the thresholds allowed in terms of the NEM: WA.
- Garden waste may be chipped on site and used for mulch to enable the reuse, otherwise disposed of at the existing Infanta Waste Station for garden waste.

During operation, refuse (household waste and recyclables) will be stored in designated, covered containers at the proposed on-site refuse collection area pending collection by Swellendam Local Municipality for recycling and disposal. The area must be maintained to prevent windblown litter, odours, pests and contaminated runoff. Hazardous waste must be stored separately and removed by an appropriate service provider. Garden waste will be stored separately at the existing Infanta garden waste facility and removed to an appropriate municipal facility, as and when required, unless suitable chipping or composting arrangements are incorporated into the development's waste-management measures as part of landscaping.

5. Energy Efficiency

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

The following energy saving devices and methods are recommended:

Lighting

- Install energy efficient light bulbs (CFLs and/or LEDs) throughout the building.
- External light fittings should direct light downwards.
- Use daylight whenever possible in lieu of artificial light.
- External lighting for pathways, pedestrian areas etc to deploy renewable solar lighting wherever practical to do so.

Water heating

- Use geyser blankets where necessary.
- Insulation of hot water pipes.
- All geysers must be fitted with timers and are to be installed vertically, if possible, as they are more energy efficient than horizonta geysers.
- Solar geysers, gas geysers and heat pumps should be considered and used where possible.
- Insulate hot water pipes and hot water storage tanks.
- Properly functioning thermostatic controls are a core feature of all hot water systems and must be properly maintained
- Thermostats must be set at the most efficient level.
- Mini-electric geysers are also an option.

SECTION K: DECLARATIONS

DECLARATION OF THE APPLICANT

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

I, Mark de Agrella, ID number 6010235202085 in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - ~~meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations~~;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
  - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - Legitimate costs in respect of specialist(s) reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

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

Signature of the Applicant: Date: 6/10/2026

Name of company (if applicable): Westerhelling Pty (Ltd

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I, **Amanda Fritz-Whyte,** EAP Registration number **2019 / 367** as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this BAR and any other documents/reports submitted in support of this BAR;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
    - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
    - ~~am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);~~
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;

Amanda Fritz-Whyte

Signature of the EAP:

13 October 2026

Date:

PHS Consulting

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I, **André-Pierre Gouws,** EAP Registration number **2023 / 6365** as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this BAR and any other documents/reports submitted in support of this BAR;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
    - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
    - ~~am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);~~
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;

APGouws

Signature of the EAP:

13 October 2026

Date:

PHS Consulting

Name of company (if applicable):