Province of the
EASTERN CAPE
ECONOMIC DEVELOPMENT,
ENVIRONMENTAL AFFAIRS & TOURISM

BASIC ASSESSMENT REPORT

(For official use only)

File Reference Number:	
NEAS Number:	
Date Received:	

Basic assessment report in terms of the Environmental Impact Assessment Regulations, 2014 as amended, promulgated in terms of the National Environmental Management Act, 1998(Act No. 107 of 1998), as amended.

Kindly note that:

1. This **basic assessment report** is a standard report that may be required by a competent authority in terms of the EIA Regulations, 2014 as amended and is meant to streamline applications. Please make sure that it is the report used by the particular competent authority for the activity that is being applied for. This report is current as of 1 OCTOBER 2022. It is the responsibility of the applicant to ascertain whether subsequent versions of the form have been published or produced by the competent authority

2. The report must be typed within the spaces provided in the form. The size of the spaces provided is not necessarily indicative of the amount of information to be provided. The report is in the form of a table that can extend itself as each space is filled with typing.

3. Where applicable **tick** the boxes that are applicable or **black out** the boxes that are not applicable in the report.

4. An incomplete report may be returned to the applicant for revision.

5. The use of "not applicable" in the report must be done with circumspection because if it is used in respect of material information that is required by the competent authority for assessing the application, it may result in the rejection of the application as provided for in the regulations.

6. This report must be handed in at offices of the relevant competent authority as determined by each authority **unless indicated otherwise by the Department**.

7. No faxed or e-mailed reports will be accepted **unless indicated otherwise by the Department**.

8. The report must be compiled by an independent environmental assessment practitioner (EAP). The EAP must satisfy conditions 11 below.

9. Unless protected by law, all information in the report will become public information on receipt by the competent authority. Any interested and affected party should be provided with the information contained in this report on request, during any stage of the application process.

10. A competent authority may require that for specified types of activities in defined situations only parts of this report need to be completed.

11.1 The Environmental Assessment Practitioner (EAP) must be registered in terms of S24H Regulations with the Registration Authority EAPASA as from 8 August 2022.

11.2. S24H (14) states that "only a person registered as an Environmental Assessment practitioner may perform tasks in connection with an application for an environmental authorisation contemplated in

(a)Chapter 5 of the Act read with the Environmental impact Assessment Regulations.

(b)Section 24G of the Act

(c) Chapter 5 of the National Environmental Management Waste Act 2008 (Act No 59 of 2008) read with the Environmental Impact Assessment Regulations

11.3. Tasks in regulation 14 may only be conducted by an EAP that is registered

11.4. Regulations 20 of S24H indicates the offences and penalties as indicated below:

"*20. Offences and penalties*

(1) A person is guilty of an offence if that person-

(a) contravenes regulation 14 of the Regulations; or

(b) pretends to be a registered environmental assessment practitioner or registered candidate environmental assessment practitioner.

(2) A person convicted of an offence in terms of subregulation (1) is liable to the penalties contemplated in section 49B(3) of the Act.". Section 49B(3) of the Act states:

"A person convicted of an offence in terms of section 49A(1)(h), (l), (m), (n), (o) or (p) is liable to a fine or to imprisonment for a period not exceeding one year, or to both a fine and such imprisonment.".

EXECUTIVE SUMMARY

1. INTRODUCTION AND BACKGROUND:

PHS Consulting has been appointed by *Retail Logistics Fund (Pty) Ltd* to undertake the application for Environmental Authorisation (Basic Assessment) for the proposed construction of a new Industrial Park (warehousing and offices) situated on Erf 10301, Wells Estate, Gqeberha, Eastern Cape Province. The property is bounded by the R102 (the Old Grahamstown Road) to the east and M Kaulela Street to the north with the R367 located to the west and Tynira Street to the south [**Figure A: Locality Map**]. Erf 10301 is owned by *Retail Logistics Fund (Pty) Ltd* and is ±166 451 m^2 in extent. The site is zoned Industrial Zone 1.

Figure A: Locality Map.

2. PROPOSED DEVELOPMENT (Alternative 1: Preferred Alternative):

The primary land-use of the proposed development will be warehousing with ancillary offices. Six zones within the property will be established made up of a combination of warehousing/ offices and these will be surrounded by roads, parking, service infrastructure, and open spaces. The total preferred development area to be cleared would be ± 161 101 m^2 (Total site extent excluding the no-go area).

Access to the site will be from M Kaulela Street. The internal distribution road will be 11m wide from kerb to kerb consisting of two 4m wide lanes and two 1.5m wide yellow shoulders, with paved walkways on both sides. The main entrance off M Kaulela Street will be four lanes through a security checkpoint. The guardhouse will be set back from the street to allow for stacking of trucks.

Stormwater run-off will be concentrated to low points in the parking areas and marshalling yards, from where the minor portion of runoff will be conveyed via a conventional underground system. The internal roads, marshalling yards, parking areas and channels will act as overland flow routes for major storm events. A new stormwater connection from the existing stormwater canal to the south of the property (crossing the R102 to the site) will be constructed. The pipe route is across municipal land, and it is recommended that the culvert be laid within an 8m wide servitude.

Two stormwater attenuation facilities/dams will be constructed on the southwestern and south-eastern boundaries, respectively. The attenuation dams will act as dry detention basins, with a combined extended storage available to effectively attenuate up to a 1: 50-year post development flood, to 1:5-year pre-development flood levels. These facilities will effectively manage and convey stormwater run-off of up to 1:100-year rainfall events to minimize the risk of flooding of internal and downstream properties. A minimum combined storage volume of 2038m^3 is required. The attenuation dam outlets will be connected to the existing stormwater channel to the south-east of the site, via the new proposed culvert.

Due to the flatness of the area, each of the six zones will have its own sewer collection sump and pump station lifting the sewer and discharging into the existing main sewer pump station. The internal sewer network for the individual sites will consist of a 160mm diameter uPVC Class 34 pipe network and round precast fibre cement manholes.

The proposed internal water reticulation network will consist of a 160mm diameter metered connection splitting into two separate lines: a 160mm diameter uPVC Class 16 for fire and a 110mm diameter uPVC Class 12 for potable water."

A 25kVA supply has been allocated to the site by the Nelson Mandela Bay Municipality (NMBM). The proposed Industrial Park is anticipated to have a load requirement of approximately 2.5 MVA. Incorporating a solar PV system is a key step toward advancing renewable energy and long-term sustainability for this development. With substantial roof space available, the initiative aims to deliver up to 1 MVA of clean energy, reducing reliance on traditional power sources and improving energy resilience. Please refer to **Figure B: Site Development Plan**.

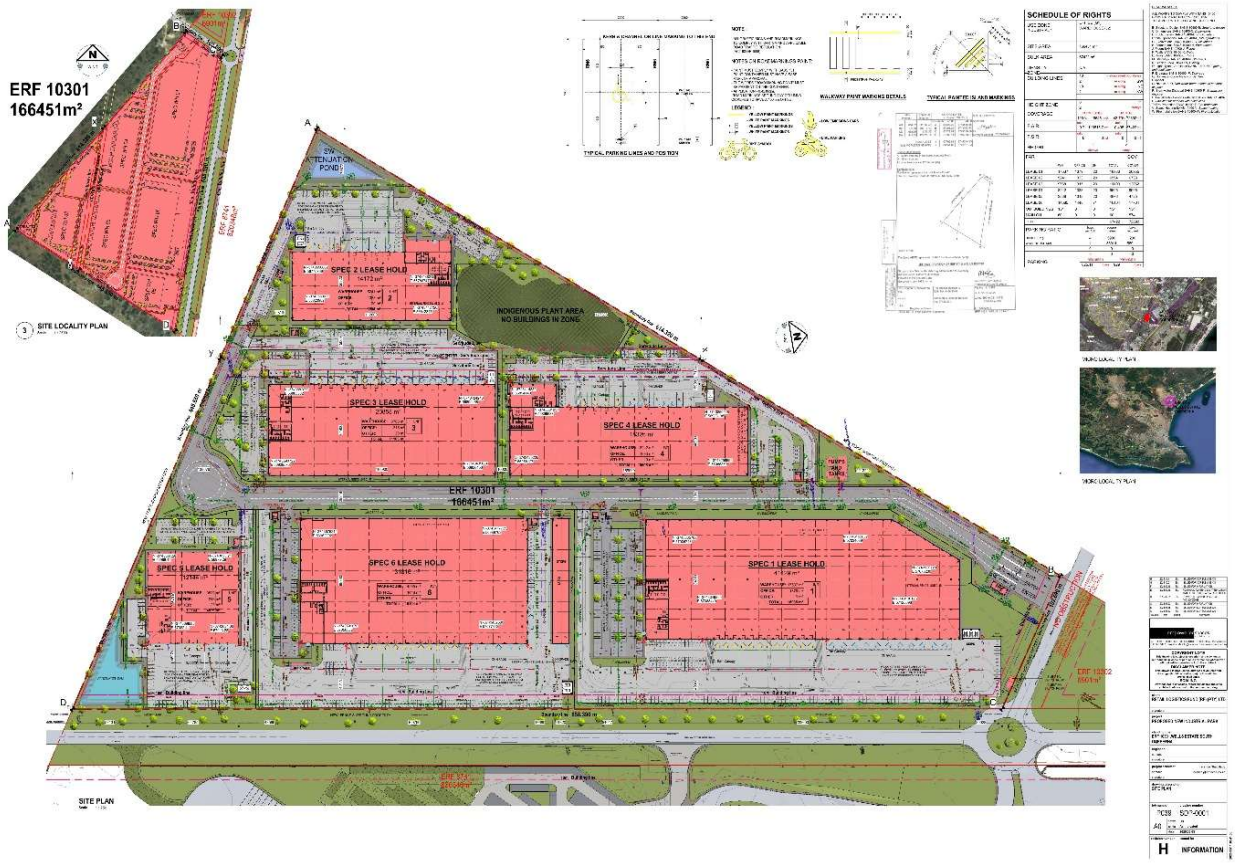

Figure B: Site Development Plan (Preferred).

3. ALTERNATIVES CONSIDERED (Alternative 1 described in Point 2 above):

Alternative 2: Rejected Alternative

The primary land-use of the development will be warehousing with ancillary offices. Six zones within the property will be established made up of a combination of warehousing/ offices and these will be surrounded by roads, parking, service infrastructure, and open spaces. The total development area to be cleared would relate to the entire extent of the site (±166 451 m^2). Access to the site will be from M Kaulela Street. The internal distribution road will be 11m wide from kerb to kerb consisting of two 4m wide lanes and two 1.5m wide yellow shoulders, with paved walkways on both sides. The main entrance off M Kaulela Street will be four lanes through a security checkpoint. The guardhouse will be set back from the street to allow for stacking of trucks. Stormwater, electricity, sewer and water reticulation will be identical to Alternative 1. However, this alternative does not avoid the intact patch of Grassridge Bontveld.

No- Go Alternative:

With regard to the No-Go Alternative, it is assumed that the site would continue to degrade due to the prevalence of alien encroachment, bush clearing and grazing. According to the Ecology Specialist "*this would continue into the long-term with a high intensity that would impact on the regional scale due to loss of important habitat. Little in the way of mitigation could be proposed due to the social needs of the surrounding residents and their requirement for grazing areas*."

Although no noise or dust socio-economic impacts would be experienced by the direct 'neigbours' the positive socio-economic opportunities in terms of job creation and the stimulation of the local economy also falls away for the no-go alternative. The positive socio-economic opportunities far out way the negative socio-economic impacts. Furthermore, the site will continue to be used as a dumping zone with the aesthetic appeal of the area becoming more degraded over time.

Considering the Aquatic and Terrestrial Ecology Study stated that "*with the mitigations, the overall significances of the impacts were rated as VERY LOW to LOW*" and he therefore has no objection to the project approval, the no-go alternative is not considered the best practicable environmental option in this instance.

4. NEMA LISTED ACTIVITIES CONSIDERED:

GN 327 LN 1: Activity 27 *The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for—* *(i) the undertaking of a linear activity; or* *(ii) maintenance purposes undertaken in accordance with a maintenance management plan.*	This activity is **LISTED** as the site contains indigenous vegetation to be cleared for the proposed industrial park. Erf 10301 is ±16.65 ha in extent. The site will be cleared in its entirety, except for an area of indigenous vegetation demarcated by the Specialist as a no-go area (approximately 5350 m^2).
GN 324 LN 3: Activity 12 *The clearance of an area of 300 square metres 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.*	This activity is **NOT LISTED** as none of the environmental attributes (within the geographical area) listed below apply. The area of intact *Grassridge Bontveld* will be maintained within a no-go area. The vegetation is furthermore Vulnerable / Least Concern and not found within and CBA or ESAs. The site is not located within close proximately to the sea or an Estuary. **Eastern 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 100 metres inland from the high water mark of the sea, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; *iv. Outside urban areas, within 100 metres inland from an estuarine functional zone; or* *v. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning.*

5. NEED AND DESIRABILITY:

The Municipal Draft SDF (2025) recognises a number of major industrial Zones for promotion of certain industrial nodes within the NMBM. The biggest one of these is the Coega SEZ (CDC). According to the SDF "the development of the Coega SEZ presents significant potential for job creation and economic growth in nearby suburbs, especially Wells Estate, Bluewater Bay, Amsterdamhoek and Motherwell, and the whole Municipality." This industrial node is located directly to the North/ North-east of the site.

According to the SDF, "the open space and green system within the metro provides a diverse range of environments, including conservation areas, Critical Biodiversity Areas, Protected Areas, Nature Reserves watercourses, ridges, heritages sites, etc. These natural systems are considered Spatial Structuring Elements, as they restrict where development can occur and guide urban growth around these features."

The Natural Open Space System is divided into "Green Systems" and "Blue Systems". Green Systems consist of: Critical Biodiversity Areas, Nature reserves, Protected Areas, Ecologically Support areas, National Parks, World Heritage Sites and Blue Systems consist of: Wetlands and its development buffer; River systems and its development buffer; Marine Protected areas and Estuaries. The site DOES NOT fall within any of these areas.

The Municipal Draft SDF (2025) also has a 'Densification Strategy', The proposed Scenario in the context of the Nelson Mandela Bay Area includes "strengthening the existing major business routes and commuter routes in the Metro by the addition of high-density development alongside", amongst others. The purpose of density proposals inside the Urban Edge is to "encourage efficient use of land and services within existing urban areas"; "prioritise infill development, brownfield redevelopment, and densification to reduce pressure on undeveloped land"; and "allow higher densities where supported by infrastructure and aligned with the zoning parameters." The proposed Industrial Park meets these requirements. As stated in the SDF the "Nelson Mandela Bay Municipality (NMBM) is a key economic hub within the Eastern Cape, anchored by a strong industrial heritage in automotive manufacturing, logistics, and agro processing."

Erf 409 (parent erf) was registered in 1965 for industrial use and has been developed/utilised for industrial purposes with an Industrial Zoning that involved continued industrial expansion on the property since 1965. In 2011 Erf 409 was subdivided (Erven 8741; 8740 and 8739) and Erven maintained the Industrial Zoning from the mother Erf. Erf 8741 was again subdivided in 2023 to create Erf 10301(a portion of Erf 8741) but maintains its Industrial Zoning. Permitted uses in terms of this zoning includes warehousing, storage, workshops and offices. Erf 10301 forms part of the built-up area as such it is regarded as inside the urban area as per NEMA definition.

The earliest development evident, according to available historic aerial photography, is before 1971 with the establishment of the GM SA facility (now located on Erf 8740 and 8739) which has expanded over the years and now covers the entire extent of these Erven. The existing Shoprite Checkers DC facility located on Erf 8741(to the east of the site) was constructed in 2012 and has recently been expanded (2024).

The proposed development will result in substantial financial investment within the area and will provide numerous employment opportunities which are required in this region. Beyond the sizable investment into the Gqebeha economy which is estimated at approximately R7.5 million annually, the project will create employment opportunities during construction and

operational phase of the project with approximately 685 jobs being created over the lifespan of the project (temporary and permanent).

The proposed development will not contradict or conflict with the municipal IDP and SDF as the proposed site occurs within an industrial area and will be utilized for such purposes. There is a definite need for the proposed activity given the magnitude of the development and positive economic impacts for the Nelson Mandela Bay Metro as a whole (financial investment into the economy and employment opportunities). The site is zoned Industrial 1 and will be utilized for such purposes. The site is located within an urban area with available bulk service infrastructure.

According to the results indicated in the Aquatic & Terrestrial Ecology Impact Assessment (EnviroSci) several important habitats are located within the proposed development site and for the most part, the areas rated with the highest sensitivity have been avoided within the preferred layout. The project has thus made use of as many previously disturbed / developed areas as possible.

Therefore, with the mitigations, the overall significances of the impacts were rated as Very Low to Low and the ecological specialist has no objection to the project approval. This is based on the assumption that any protected or listed species that still remain will be relocated to the proposed open space area. All recommended mitigation measures have been included in the EMPr.

According to the NMBM IDP (2021), Nelson Mandela Bay Municipality continues to suffer the consequences of the most persistent drought in its history coupled with the impacts of the COVID-19 pandemic which began in early 2020. The impacts are exacerbated by the fact that the City has high levels of poverty, joblessness, homelessness, and a declining fiscus caused inter alia by decreased grant funding from National Treasury as well as a weakened national and local economy. Job creation and restoring the economy has been identified as a key priority. Emphasis is placed on economic turnaround through inter alia, the creation of an enabling environment for private sector investments to create jobs. The expected capital value of the activity on completion is estimated at around R1 Billion and a further R7.5 million is estimated to be generated by the proposed development on an annual basis. Furthermore, the expected value of employment opportunities during the development phase is estimated at around R220 million. These figures will assist the municipality and society by stimulating the local economy and providing job opportunities within the Gqeberha.

Spatial targeting and the elimination of spatial inequalities, as envisaged in the National Development Plan, is an underlying principle of the Urban Network approach, hence the focus of the IDP on the catalytic development of under-serviced city areas. The Urban Network Strategy identifies a number of network elements (CBD, hubs, growth areas) and allows for the identification of Integration Zones that link CBDs and hubs in which catalytic development is encouraged. Wells Estate, amongst other areas, has been identified as a growth area (secondary urban hub). The proposed development will have a positive local and regional economic impact, benefiting society in general.

The benefit for local communities associated with the proposed development will mainly be economic / job creation as detailed above. The expected capital value of the activity on completion is estimated at around R1 Billion and a further R7.5 million is estimated to be generated by the proposed development on an annual basis. Furthermore, the expected value of employment opportunities during the development phase is estimated at around R220 million. These figures will assist the municipality and society by stimulating the local economy and providing job opportunities within the Gqeberha.

6. ENVIRONMENTAL ATTRIBUTES:

It needs to be noted that the site is part of a developed industrial area with development rights, as such densification and development of the area is expected based on sustainability principles and weighing all three impact pillars namely social, economic and the environment. The project relates to a R1 Billion investment into the area providing much needed positive socio-economic stimulation within the local municipality and beyond. Based on the advantages and disadvantages of the development layout alternatives in terms of the environmental context, the preferred layout will result in less severe environmental impacts due the exclusion of the no-go area from the development footprint. Refer to **Figure C**.

Vegetation -

Grassridge Bontveld vegetation, restricted to the karst landscape created in the underlying limestone, consists of scattered, low bushclumps of Thicket species, in a matrix of open grassland which contains species characteristic of Fynbos, Grassland and Succulent Karoo vegetation types. Bushclumps are dominated by Aloe africana, Chrysanthemoides monilifera, Colpoon compressum, Euclea undulata, Pterocelastrus tricuspidatus and Sideroxylon inerme. The grassy matrix in Grassridge Bontveld is dominated by Cynodon dactylon, Eustachys paspaloides, Themeda triandra, Ficinia truncata, Acmadenia obtusata, Disparago ericoides, Euryops ericifolius, Gazania krebsiana, Gibbaria scabra, Jamesbrittenia microphylla, Lobostemon trigonus, Monsonia emarginata, Nylandtia spinosa, Osteospermum imbricatum and Pteronia incana. These grassy / fynbos areas also included high number of the small Euphorbia species (E. globosa, & E. obesa), Pachypodium bispinosum and P. succulentum and Fockea gracilis plants all of which are protected.

The proposed site is located within this vegetation type and thus all of these species listed above were observed with small, isolated areas, with only one small clump (thicket / grassland mosaic) remaining (4% of the site). The remainder of the site (96%), is heavily grazed by goats and cattle, used for illegal dumping of covered by alien Acacia cyclops, Acacia longifolia, Acacia saligna, Lantana camara and Opuntia ficus-indica.

From a conservation perspective the vegetation type/habitat listed in the NMBM Bioregional Plan is considered 'Vulnerable'. It should be noted that this bioregional plan was promulgated under the National Environmental Management: Biodiversity Act (10/2004): Publishing of the Final Bioregional Plan for the NMBM, March 2014 GN No. 3362. On 18 November 2022 a revised list of threatened ecosystems in need of protection was published in terms of the National Environmental Management, Biodiversity Act (NEMBA), (Act No 10 of 2004) (based on vegetation types in the Vegmap, 2006, as amended). Should a vegetation type or ecosystem be listed, actions in terms of NEM:BA are triggered. None of those ecosystems observed within the study area are listed in terms of this Act, i.e. the remaining extent of the observed Grassridge Bontveld is listed as Least Concern.

Several important plant species are known to occur within the region as these are listed by SANBI under the Threatened Species Programme using the International Union for Conservation of Nature or IUCN (Red data list) criteria. The highest density of the listed species are always found within the Grassridge Bontveld areas, and in particular along the edges of the bush clumps.

Several plant species are also listed in the Provincial Nature Conservation Ordinance (PNCO) of 1974, the National Forest Act (Act No. 84 of 1998). These species of special concern will require permits from the relevant provincial departments if any individuals are to be removed, translocated or trimmed according to the relevant legislation including the National Forestry Act (No. 84 of 1998) (Department of Forestry, Fisheries and the Environment) and the Provincial Nature Conservation Ordinance (Eastern Cape Department of Economic Development, Environmental Affairs and Tourism – Permit Administration).

Aquatic -

No rivers or connected watercourses are anticipated within the study area, i.e. no concentrated surface flows are linked directly to any mainstem rivers within the greater region. Thus, the site is dominated by a coastal bench / plateaus which is underlain by calcrete formations of the Algoa Group (Alexandria Formation), within the M30B quaternary catchment of the Coega River. Two canals are located between 200 and 500m from the site, and these drain the Motherwell area of stormwater into the Swartkops Estuary.

The proposed site is not located within any Wetland Cluster as shown in the NSBA (2018) spatial information. These are areas with a high density of wetlands such as Valley Bottom systems. The proposed site is located within the Coega Table Mountain Sandstone Groundwater Strategic Water Resource Area. A Strategic Water Source Area (SWSA) is one where the water that is supplied is of national importance for water security. Surface water SWSAs are found in areas with high rainfall and produce most of the runoff. Groundwater SWSAs have high groundwater recharge and are located where the groundwater forms a nationally important resource. There are 22 national-level SWSAs for surface water (SWSA-sw) and

37 for groundwater (SWSA-gw). The SWSA-gw cover 9% of the area of South Africa, account for 15% of the recharge, 46% of the groundwater used by agriculture and 47% of the groundwater used by industry.

Furthermore, one wetland was indicated within 500m of the proposed site, namely an Endorheic Pan / Depression. The wetland is not located on the site.

Fauna -

The majority of species listed as well as observed with a conservation status were found in association with the rocky outcrops or the Bontveld areas. Most of the species that are likely to occur were observed during the Search and Rescue programme during the construction of the adjacent Checkers Distribution Centre (DC) site. Although the DC site was less degraded than the study area, with more available habitat, species may still occur.

The majority of these species were listed by the PNCO, while the species listed by the DFFE Screening Tool were all rated as of Medium Sensitivity. DFFE also listed several bird species however these are all birds of prey and will move from the site should they occur.

The results indicated that several important habitats are located within the proposed development site and for the most part, the areas rated with the highest sensitivity have been avoided within the preferred layout. The project has thus made use of as many previously disturbed / developed areas as possible. Therefore, with the mitigations, the overall significances of the impacts were rated as VERY LOW to LOW and the ecological specialist has no objection to the project approval. This is based on the assumption that any protected or listed species that still remain will be relocated to the proposed open space area.

According to the results indicated in the Aquatic & Terrestrial Ecology Impact Assessment (EnviroSci) several important habitats are located within the proposed development site and for the most part, the areas rated with the highest sensitivity have been avoided within the preferred layout. The project has thus made use of as many previously disturbed / developed areas as possible. Therefore, with the mitigations, the overall significances of the impacts were rated as Very Low to Low and the ecological specialist has no objection to the project approval. This is based on the assumption that any protected or listed species that still remain will be relocated to the proposed open space area. All recommended mitigation measures have been included in the EMPr.

Heritage –

Based on the extensively disturbed nature of the area proposed for development, it is very unlikely that the proposed development will impact on significant, in situ archaeological resources. In addition, there are clearly no structures of any kind located within the proposed development area which may have heritage significance. As such, it is recommended that no further archaeological assessments are required. However, should any archaeological resources or human remains be uncovered during the course of construction, work must cease and ECPHRA must be notified. It is also very unlikely that significant palaeontological resources will be impacted by the proposed development. However, it is recommended that Chance Finds Procedure be adopted and implemented throughout the construction phase of the development. Final comment has been obtained from ECPHRA who agrees with these findings and exempts the project from doing further heritage studies (**Appendix E7**).

The Site Sensitivity Verification Report (**Annexure G4**) and the DEA Screening Tool Report (**Annexure G5**) is included in this Basic Assessment Report.

Figure C: Showing the site to be developed (inside red boundary) in relation to the environmental sensitivities and no-go areas.

7. SUMMARY OF IMPACT ASSESSMENT FINDINGS -

Identified Potential Impact	Significance before Mitigation	Significance after Mitigation
PREFERRED ALTERNATIVE		
A) TERRESTRIAL		
Impact 1: Loss of vegetation and in particular species / habitats that are listed as Vulnerable	**MEDIUM (-)**	**LOW (-)**
Impact 2: Loss and/or Fragmentation of Faunal Habitat	**MEDIUM (-)**	**LOW (-)**
Impact 3: The potential spread of alien vegetation	**MEDIUM (-)**	**LOW (-)**
B) AQUATIC (The proposed development has avoided all aquatic systems.)		
Impact 4: Loss of wetland habitat and any functional corridors	**MEDIUM (-)**	**VERY LOW (-)**
Impact 5: Changes to the hydrological regime and increased potential for erosion	**LOW (-)**	**VERY LOW (-)**
Impact 6: Changes to water quality	**MEDIUM (-)**	**VERY LOW (-)**
C) HERITAGE RESOURCES		
Impact 7: Impact on Heritage Resources	**LOW (-)**	**LOW (-)**
D) SOCIO-ECONOMIC		
Impact 8: Nuisance Impacts associated with the Construction Phase (e.g. Noise & Dust)	**MEDIUM (-)**	**LOW (-)**
Impact 9: Positive Socio-Economic impacts associated with the Construction & Operational Phase (e.g. job creation and stimulating the local economy)	**HIGH (+)**	**HIGH (+)**

8. MITIGATION, MANAGEMENT AND MONITORING MEASURES PROPOSED:

Construction Phase:

- The project proponent/representative must notify ECPHRA of the date of commencement of the project or share the project schedule and Environmental Authorisation (EA).
- It is recommended that the Chance Finds Procedure be adopted and implemented throughout the construction phase of the development. The developer must get specialists' input in order to submit a detailed, site specific heritage & paleontological chance finds procedure (CFP), before the start of the pre/construction phase, for ECPHRA's approval. The CFP must outline stop-work procedures, emergency protection measures, reporting protocols, contact details for ECPHRA and approved heritage specialists, guidance on recognising heritage materials and graves. The CFP must form part of the EMPr and be available on site at all times.
- Heritage induction and training for all ground crew, must include identification of archaeological, palaeontological, historical, and burial-related material. This ensures lawful heritage compliance during all phases of the project.
- Heritage monitoring
- Should any archaeological resources or human remains be uncovered during the course of construction, work must cease and ECPHRA must be notified.
- All temporary works areas (laydowns and camps), where possible, must be placed in previously disturbed areas within the site, including any temporary access roads or storage areas, e.g. in areas where alien vegetation is dense and could be cleared for this purpose.
- Any protected or listed species that are mentioned in the Terrestrial Ecologists Report must be relocated with the requisite permits in place.
- Comply with search and rescue specifications as per the permits issued.
- The revegetation of any temporary sites, as well as any previously degraded areas, must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications particularly the remaining open space areas.
- Alien vegetation management must be initiated at the beginning of the construction period.
- No stormwater discharged may be directed to delineated aquatic zone (Figure 8 above).
- A construction and operational stormwater management plan must be developed post EA, detailing the structures and actions that must be installed to prevent the increase of surface water flows directly into any natural systems.
- Effective stormwater management must include measures to slow, spread and deplete the energy of concentrated flows thorough effective stabilisation (gabions and Reno mattresses) and the re-vegetation of any disturbed areas.
- All construction materials including fuels and oil should be stored in demarcated areas that are contained within berms / bunds to avoid spread of any contamination.
- Washing and cleaning of equipment should also be done in berms or bunds, in order to trap any cement and prevent excessive soil erosion. Mechanical plant and bowsers must not be refueled or serviced within or directly adjacent to any channel. It is therefore suggested that all construction camps, lay down areas, batching plants or areas and any stores should be located further than a temporary 85 m from a watercourse and wetland. Chemicals used for construction must be stored safely on site and surrounded by bunds. Chemical storage containers must be regularly inspected so that any leaks are detected early.
- Develop and implement emergency plans in case of any spillages.
- Littering and contamination of water sources during construction must be prevented by effective construction camp management.
- Emergency plans must be in place in case of spillages onto road surfaces and water courses.

- No stockpiling should take place within a water course, wetland or buffers and all stockpiles must be protected from erosion, stored on flat areas where run-off will be minimised, and be surrounded by bunds.

Operational Phase:

- Upon completion of the project, a final heritage compliance report is to be submitted to ECPHRA.
- The revegetation of any temporary sites, as well as any previously degraded areas, must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications in particular the remaining open space areas.
- Alien vegetation management must be initiated at the beginning of the construction period and is ongoing.
- No stormwater discharged may be directed to delineated aquatic zone.
- A construction and operational stormwater management plan must be developed post EA, detailing the structures and actions that must be installed to prevent the increase of surface water flows directly into any natural systems.
- Effective stormwater management must include measures to slow, spread and deplete the energy of concentrated flows thorough effective stabilisation (gabions and Reno mattresses) and the re-vegetation of any disturbed areas.
- Washing and cleaning of equipment should also be done in berms or bunds, in order to trap any cement and prevent excessive soil erosion. Mechanical plant and bowsers must not be refuelled or serviced within or directly adjacent to any channel. It is therefore suggested that all construction camps, lay down areas, batching plants or areas and any stores should be located further than a temporary 85 m from a watercourse and wetland. Chemicals used for construction must be stored safely on site and surrounded by bunds. Chemical storage containers must be regularly inspected so that any leaks are detected early.
- Develop and implement emergency plans in case of any spillages.
- Emergency plans must be in place in case of spillages onto road surfaces and water courses.

Monitoring:

- Regeneration of alien vegetation must be monitored once all areas have been cleared, forming part of a long-term alien vegetation management plan within any remaining open space areas.
- The revegetation of any temporary sites, as well as any previously degraded areas, must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications in particular the remaining open space areas.
- Alien vegetation management must be initiated at the beginning of the construction period.
- Any concentrated runoff and or erosion where observed must be rectified with the appropriate stormwater management measures, e.g. gabions, reno mattresses or energy dissipators, and not be discharged into any natural wetland features.
- Stormwater systems must be inspected on an annual basis to ensure these are functional.

The Environmental Management Programme (**Appendix F**) be approved and implemented (which addresses all the mitigation measures outlined in this report).

An Environmental Control Officer (ECO) must be appointed to monitor compliance and implementation of the approved EMPr, mitigation measures outlined in Section E above, and all Environmental Authorisation conditions.

9. CONCLUSION AND RECOMMENDATION

Erf 409 (parent erf) was registered in 1965 for industrial use and has been developed/utilised for industrial purposes with an Industrial Zoning that involved continued industrial expansion on the property since 1965. In 2011 Erf 409 was subdivided (Erven 8741; 8740 and 8739) and Erven maintained the Industrial Zoning from the mother Erf. Erf 8741 was again subdivided in 2023 to create Erf 10301(a portion of Erf 8741) but maintains its Industrial Zoning. Permitted uses in terms of this zoning includes warehousing, storage, workshops and offices. Erf 10301 forms part of the built-up area as such it is regarded as inside the urban area as per NEMA definition. Furthermore, the earliest development evident, according to available historic aerial photography, is before 1971 with the establishment of the GM SA facility (now located on Erf 8740 and 8739) which has expanded over the years and now covers the entire extent of these Erven. The existing Shoprite Checkers DC facility located on Erf 8741(to the east of the site) was constructed in 2012 and has recently been expanded (2024).

The proposed development will result in substantial financial investment within the area and will provide numerous employment opportunities which are required in this region. Beyond the sizable investment into the Gqebeha economy which is estimated at approximately R7.5 million annually, the project will create employment opportunities during construction and operational phase of the project with approximately 685 jobs being created over the lifespan of the project (temporary and permanent).

The proposed development will not contradict or conflict with the municipal IDP and SDF as the proposed site occurs within an industrial area and will be utilized for such purposes. There is a definite need for the proposed activity given the magnitude of the development and positive economic impacts for the Nelson Mandela Bay Metro as a whole (financial investment into the economy and employment opportunities). The site is zoned Industrial 1 and will be utilized for such purposes. The site is located within an urban area with available bulk service infrastructure.

Gqeberha has high levels of poverty, joblessness, homelessness, and a declining fiscus. Job creation and restoring the economy has been identified as a key priority within various planning policies. Emphasis is placed on economic turnaround through inter alia, the creation of an enabling environment for private sector investments to create jobs. The expected capital value of the activity on completion is estimated at around R1 Billion and a further R7.5 million is estimated to be generated by the proposed development on an annual basis. Furthermore, the expected value of employment opportunities during the development phase is estimated at around R220 million. These figures will assist the municipality and society by stimulating the local economy and providing job opportunities within the Gqeberha.

According to the results indicated in the Aquatic & Terrestrial Ecology Impact Assessment (EnviroSci) several important habitats are located within the proposed development site and for the most part, the areas rated with the highest sensitivity have been avoided within the preferred layout. The project has thus made use of as many previously disturbed / developed areas as possible. Therefore, with the mitigations, the overall significances of the impacts were rated as Very Low to Low and the ecological specialist has no objection to the project approval. This is based on the assumption that any protected or listed species that still remain will be relocated to the proposed open space area. All recommended mitigation measures have been included in the EMPr.

It needs to be noted that the site is part of a developed industrial area with development rights, as such densification and development of the area is expected based on sustainability principles and weighing all three impact pillars namely social, economic and environment. The project relates to a R 1 Billion investment into the area clearly providing for a massive socio-economic injection and benefit for the Eastern Cape. This is the expected output and purpose of industrial/commercial areas. Based on the advantages and disadvantages of the development layout alternatives, the preferred layout will result in less severe environmental impacts due to the exclusion of the patch of sensitive vegetation in comparison with the alternative rejected layout. The advantages/disadvantages associated with the No-Go option (i.e., not proceeding with development) are based on current impacts that are likely to continue in the study area.

No further heritage studies are recommended for this proposed development on condition that; should any archaeological resources or human remains be uncovered during the course of construction, work must cease and ECPHRA must be notified; and the Chance Finds Procedure be adopted and implemented throughout the construction phase of the development.

All nuisance impacts on the surrounding environment will be reduced to acceptable levels through implementing the recommended mitigation measures.

The proposed development will have a high positive significant impact on the socio-economic environment through job creation and economic development.

It is recommended that the proposed development is approved on condition that recommended mitigation measures (section 8 above) are implemented.

SECTION A: ACTIVITY INFORMATION

Has a specialist been consulted to assist with the completion of this section? YES [redacted]

If YES, please complete declaration form (**Appendix G2**) for each specialist thus appointed:

Any specialist reports must be contained in **Appendix D**.

1. ACTIVITY DESCRIPTION

Describe the activity, which is being applied for, in detail

The proposed construction of a new Industrial Park (warehousing and offices) situated on Erf 10301, Wells Estate, Gqeberha, Eastern Cape Province.

PHS Consulting has been appointed by *Retail Logistics Fund (Pty) Ltd* to undertake the application for Environmental Authorisation (Basic Assessment) for the proposed construction of a new Industrial Park (warehousing and offices) situated on Erf 10301, Wells Estate, Gqeberha, Eastern Cape Province. The property is bounded by the R102 (the Old Grahamstown Road) to the east and M Kaulela Street to the north with the R367 located to the west and Tynira Street to the south [**Appendix A: Locality Map**]. Erf 10301 is owned by *Retail Logistics Fund (Pty) Ltd* and is ±16.65 ha in extent. The site is zoned Industrial Zone 1.

The primary land-use of the proposed development will be warehousing with ancillary offices. Six zones within the property will be established made up of a combination of warehousing/ offices and these will be surrounded by roads, parking, service infrastructure, and open spaces. The total development footprint to be cleared is ± 161 101 m^2.

Access to the site will be from M Kaulela Street. The internal distribution road will be 11m wide from kerb to kerb consisting of two 4m wide lanes and two 1.5m wide yellow shoulders, with paved walkways on both sides. The main entrance off M Kaulela Street will be four lanes through a security checkpoint. The guardhouse will be set back from the street to allow for stacking of trucks.

Stormwater run-off will be concentrated to low points in the parking areas and marshalling yards, from where the minor portion of runoff will be conveyed via a conventional underground system. The internal roads, marshalling yards, parking areas and channels will act as overland flow routes for major storm events. A new stormwater connection from the existing stormwater canal to the south of the property (crossing the R102 to the site) will be constructed. The pipe route is across municipal land, and it is recommended that the culvert be laid within an 8m wide servitude. Please refer to **Figure 2**.

Two stormwater attenuation facilities/dams will be constructed on the southwestern and south-eastern boundaries, respectively. The attenuation dams will act as dry detention basins, with a combined extended storage available to effectively attenuate up to a 1: 50-year post development flood, to 1:5-year pre-development flood levels. These facilities will effectively manage and convey stormwater run-off of up to 1:100-year rainfall events to minimize the risk of flooding of internal and downstream properties. A minimum combined storage volume of 2038m^3 is required. The attenuation dam outlets will be connected to the existing stormwater channel to the south-east of the site, via the new proposed culvert.

Due to the flatness of the area, each of the six zones will have its own sewer collection sump and pump station lifting the sewer and discharging into the existing main sewer pump station. The internal sewer network for the

individual sites will consist of a 160mm diameter uPVC Class 34 pipe network and round precast fibre cement manholes.

The proposed internal water reticulation network will consist of a 160mm diameter metered connection splitting into two separate lines: a 160mm diameter uPVC Class 16 for fire and a 110mm diameter uPVC Class 12 for potable water."

A 25kVA supply has been allocated to the site by the Nelson Mandela Bay Municipality (NMBM). The proposed Industrial Park is anticipated to have a load requirement of approximately 2.5 MVA. Incorporating a solar PV system is a key step toward advancing renewable energy and long-term sustainability for this development. With substantial roof space available, the initiative aims to deliver up to 1 MVA of clean energy, reducing reliance on traditional power sources and improving energy resilience.

Please refer to **Figure 1** & **Appendix C1** for the proposed **Site Development Plan**.

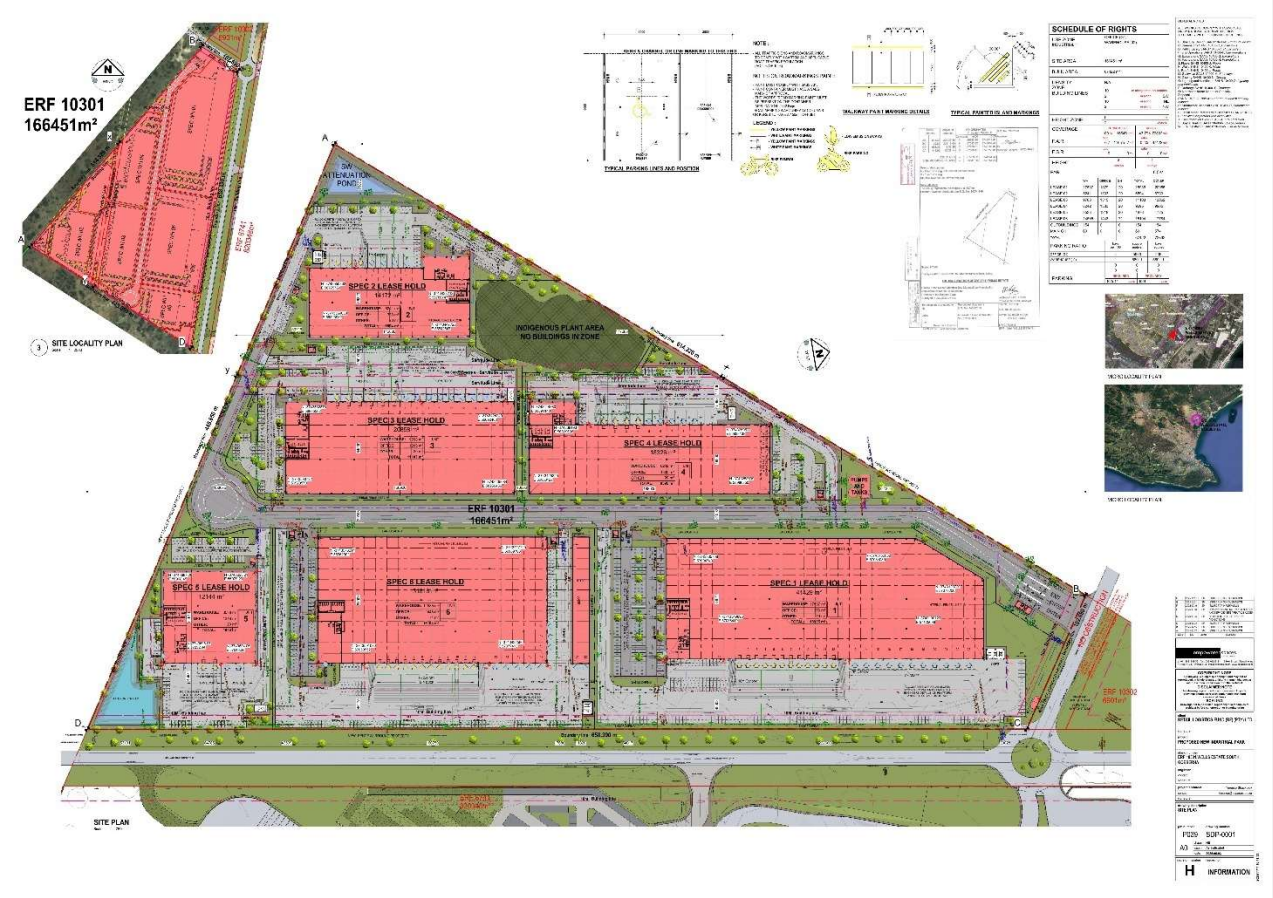

Figure 1: Site Development Plan (Preferred).

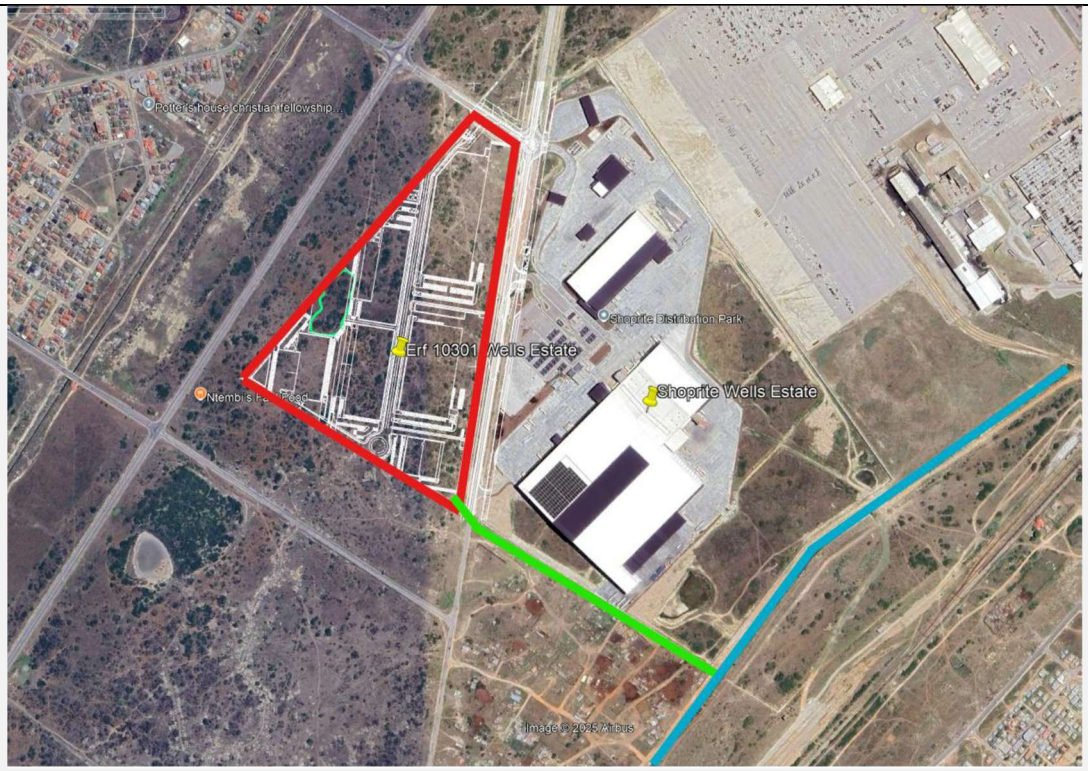

Figure 2: Proposed Stormwater connection in green (red = site; blue = existing SW channel).

Activities in terms of the NEMA EIA Regulations to be authorised:

GN 327 LN 1: Activity 27 *The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for—* *(i) the undertaking of a linear activity; or* *(ii) maintenance purposes undertaken in accordance with a maintenance management plan.*	This activity **IS LISTED** as the site contains indigenous vegetation to be cleared for the proposed industrial park. Erf 10301 is ±16.65 ha in extent. The site will be cleared in its entirety, except for an area of indigenous vegetation demarcated by the Specialist as a no-go area (approximately 5350 m^2).
GN 324 LN 3: Activity 12 *The clearance of an area of 300 square metres 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.* **Eastern 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;	This activity is **NOT LISTED** as none of the environmental attributes (within the geographical area) listed below apply. The area of intact *Grassridge Bontveld* will be maintained within a no-go area. The vegetation is furthermore Vulnerable / Least Concern and not found within and CBA or ESAs. The site is not located within close proximately to the sea or an Estuary.

iii. Within the littoral active zone or 100 metres inland from the high water mark of the sea, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; iv. Outside urban areas, within 100 metres inland from an estuarine functional zone; or v. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning.		
Note: The stormwater channel proposed does not constitute a listed activity in terms of NEMA.		

2. FEASIBLE AND REASONABLE ALTERNATIVES

"alternatives", in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to—

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

Describe alternatives that are considered in this application. Alternatives should include a consideration of all possible means by which the purpose and need of the proposed activity could be accomplished in the specific instance taking account of the interest of the applicant in the activity. The no-go alternative must in all cases be included in the assessment phase as the baseline against which the impacts of the other alternatives are assessed. The determination of whether site or activity (including different processes etc.) or both is appropriate needs to be informed by the specific circumstances of the activity and its environment. After receipt of this report the competent authority may also request the applicant to assess additional alternatives that could possibly accomplish the purpose and need of the proposed activity if it is clear that realistic alternatives have not been considered to a reasonable extent.

Paragraphs 3 – 13 below should be completed for each alternative.

3. ACTIVITY POSITION

Indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates should be in degrees and decimal minutes. The minutes should have at least three decimals to ensure adequate accuracy. The projection that must be used in all cases is the WGS84 spheroid in a national or local projection.
List alternative sites if applicable.

Alternative:	**Latitude (S):**		**Longitude (E):**	
Alternative S1[1] (preferred or only site alternative)	33°	48‘ 58.83”	25°	36‘ 56.22”
Alternative S2 (if any)				
Alternative S3 (if any)				

In the case of linear activities: N/A

Alternative:	**Latitude (S):**		**Longitude (E):**	
Alternative S1 (preferred or only route alternative)				
• Starting point of the activity				
• Middle point of the activity				
• End point of the activity				
Alternative S2 (if any)				
• Starting point of the activity				
• Middle point of the activity				
• End point of the activity				
Alternative S3 (if any)				
• Starting point of the activity				
• Middle point of the activity				
• End point of the activity				

For route alternatives that are longer than 500m, please provide an addendum with co-ordinates taken every 250 meters along the route for each alternative alignment.

4. PHYSICAL SIZE OF THE ACTIVITY

Indicate the physical size of the preferred activity/technology as well as alternative activities/technologies (footprints):

Alternative:	**Size of the activity:**
Alternative A1[2] (preferred activity alternative)	161 101 m^2
Alternative A2 (rejected alternative)	166 451 m^2
Alternative A3 (if any)	

[1] “Alternative S..” refer to site alternatives.
[2] “Alternative A..” refer to activity, process, technology or other alternatives.

or, for linear activities: N/A

Alternative:	**Length of the activity:**
Alternative A1 (preferred activity alternative)	[redacted]
Alternative A2 (if any)	
Alternative A3 (if any)	

Indicate the size of the alternative sites or servitudes (within which the above footprints will occur):

Alternative:	**Size of the site:**
Alternative A1 (preferred activity alternative)	166 451m^2
Alternative A2 (if any)	166 451m^2
Alternative A3 (if any)	[redacted]

5. SITE ACCESS

Does ready access to the site exist?	YES [redacted]
If NO, what is the distance over which a new access road will be built	Access will be improved within the property boundaries.

Describe the type of access road planned:

The proposed development will border on the R102 and M Kaulela Street. Access to Erf 10301 will be from the existing M Kaulela Street as shown on the site development plan (**Appendix C1**). The internal distribution road will be 11m wide from kerb to kerb consisting of two 4m wide lanes and two 1.5m wide yellow shoulders, with paved walkways on both sides. The main entrance off M Kaulela Street will be four lanes through a security checkpoint. The guardhouse will be set back from the street to allow for stacking of trucks.

Include the position of the access road on the site plan and required map, as well as an indication of the road in relation to the site.

6. SITE OR ROUTE PLAN

A detailed site or route plan(s) must be prepared for each alternative site or alternative activity. It must be attached as **Appendix C** to this document.

The site or route plans must indicate the following:

6.1 the scale of the plan which must be at least a scale of 1:500;

6.2 the property boundaries and numbers of all the properties within 50 metres of the site;

6.3 the current land use as well as the land use zoning of each of the properties adjoining the site or sites;

6.4 the exact position of each element of the application as well as any other structures on the site;

6.5 the position of services, including electricity supply cables (indicate above or underground), water supply pipelines, boreholes, street lights, sewage pipelines, storm water infrastructure and telecommunication infrastructure;

6.6 all trees and shrubs taller than 1.8 metres;

6.7 walls and fencing including details of the height and construction material;

6.8 servitudes indicating the purpose of the servitude;

6.9 sensitive environmental elements within 100 metres of the site or sites including (but not limited thereto):

- rivers;
- the 1:100 year flood line (where available or where it is required by DWA);
- ridges;
- cultural and historical features;
- areas with indigenous vegetation (even if it is degraded or invested with alien species);

6.9 for gentle slopes the 1 metre contour intervals must be indicated on the plan and whenever the slope of the site exceeds 1:10, the 500mm contours must be indicated on the plan; and

6.10 the positions from where photographs of the site were taken. [**Refer to Appendix B**]

7. SITE PHOTOGRAPHS

Colour photographs from the centre of the site must be taken in at least the eight major compass directions with a description of each photograph. Photographs must be attached under **Appendix B** to this form**.** It must be supplemented with additional photographs of relevant features on the site, if applicable.

8. FACILITY ILLUSTRATION

A detailed illustration of the activity must be provided at a scale of 1:200 as **Appendix C** for activities that include structures. The illustrations must be to scale and must represent a realistic image of the planned activity. The illustration must give a representative view of the activity.

9. ACTIVITY MOTIVATION

9(a) Socio-economic value of the activity

What is the expected capital value of the activity on completion?	±R 1 billion
What is the expected yearly income that will be generated by or as a result of the activity?	±R 7.5 million
Will the activity contribute to service infrastructure?	YES [redacted]
Is the activity a public amenity?	[redacted] NO
How many new employment opportunities will be created in the development phase of the activity?	± 305
What is the expected value of the employment opportunities during the development phase?	± R 220 million
What percentage of this will accrue to previously disadvantaged individuals?	Unknown
How many permanent new employment opportunities will be created during the operational phase of the activity?	±380
What is the expected current value of the employment opportunities during the first 10 years?	Unknown
What percentage of this will accrue to previously disadvantaged individuals?	Unknown

9(b) Need and desirability of the activity

Motivate and explain the need and desirability of the activity (including demand for the activity):

The Municipal Draft SDF (2025) recognises a number of major industrial Zones for promotion of certain industrial nodes within the NMBM. The biggest one of these is the Coega SEZ (CDC). According to the SDF "*the development of the Coega SEZ presents significant potential for job creation and economic growth in nearby suburbs, especially Wells Estate, Bluewater Bay, Amsterdamhoek and Motherwell, and the whole Municipality*." This industrial node is located directly to the North/ North-east of the site.

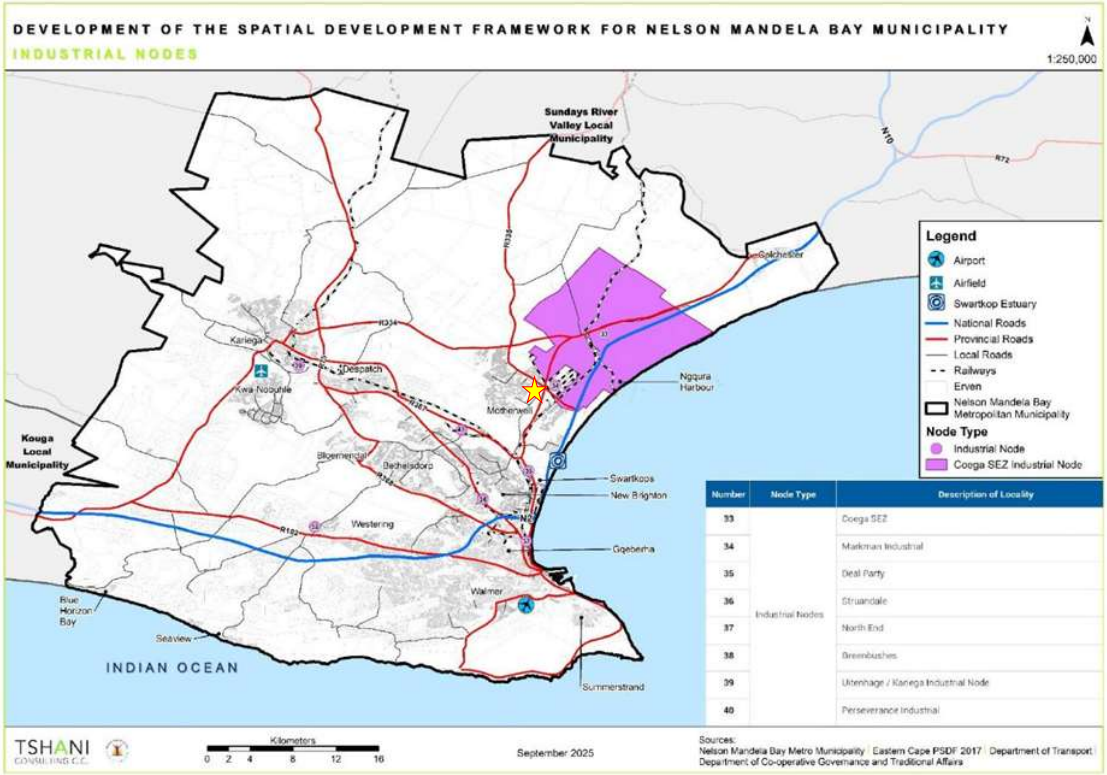

Figure 2: Map 5 of the SDF showing the Coega Industrial Node in relation to the site shown by the yellow star.

According to the SDF, "*the open space and green system within the metro provides a diverse range of environments, including conservation areas, Critical Biodiversity Areas, Protected Areas, Nature Reserves watercourses, ridges, heritages sites, etc. These natural systems are considered Spatial Structuring Elements, as they restrict where development can occur and guide urban growth around these features*."

The Natural Open Space System is divided into the "Green Systems", Map 12 (Figure 2), and the "Blue Systems", Map 13 (Figure 3). Green Systems consist of: Critical Biodiversity Areas, Nature reserves, Protected Areas, Ecologically Support areas, National Parks, World Heritage Sites and Blue Systems consist of: Wetlands and its development buffer; River systems and its development buffer; Marine Protected areas and Estuaries. The star below indicates the approximate position of the site within these "open space and green systems". It is clear that the site **DOES NOT** fall within these areas.

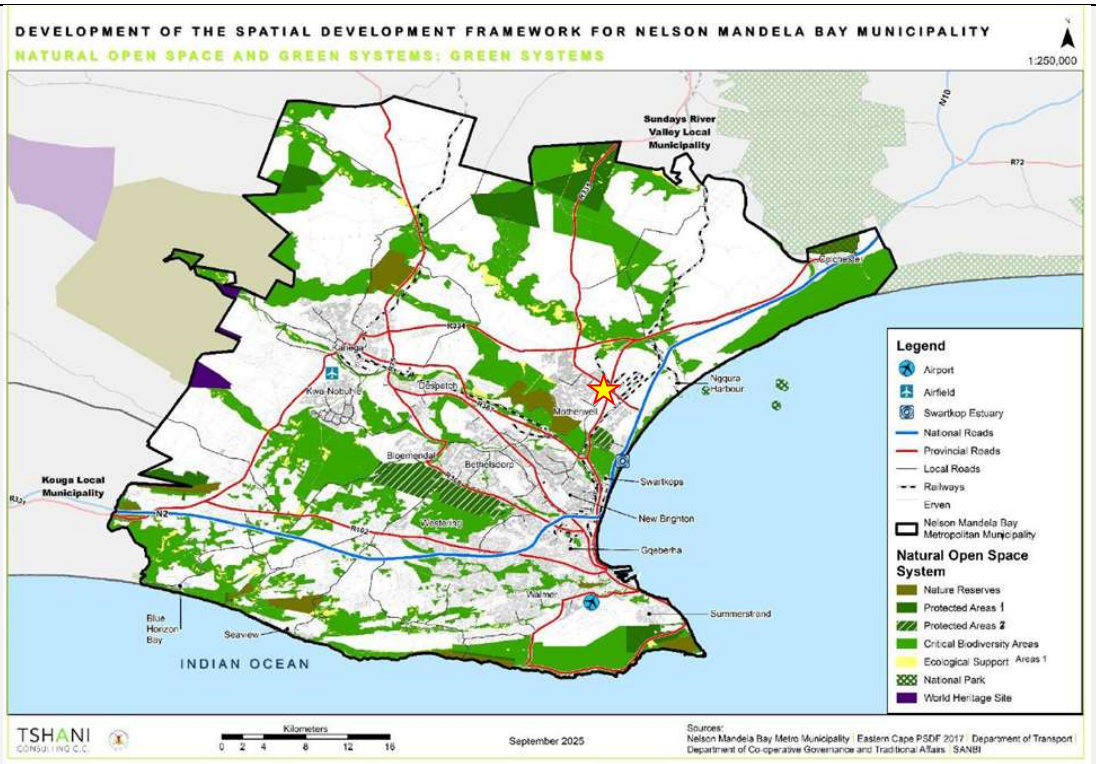

Figure 3: Map 12 of the SDF showing Natural Open Space (Green Systems) in relation to the site shown by the yellow star.

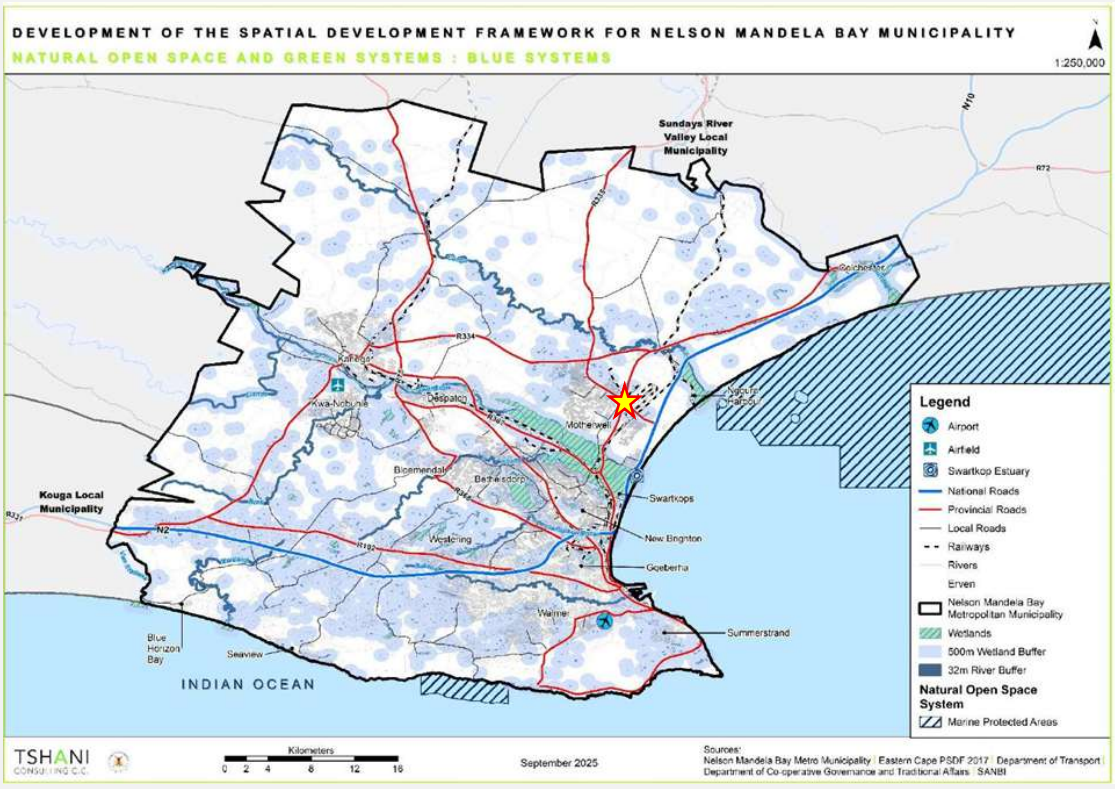

Figure 4: Map 13 of the SDF showing Natural Open Space (Blue Systems) in relation to the site shown by the yellow star.

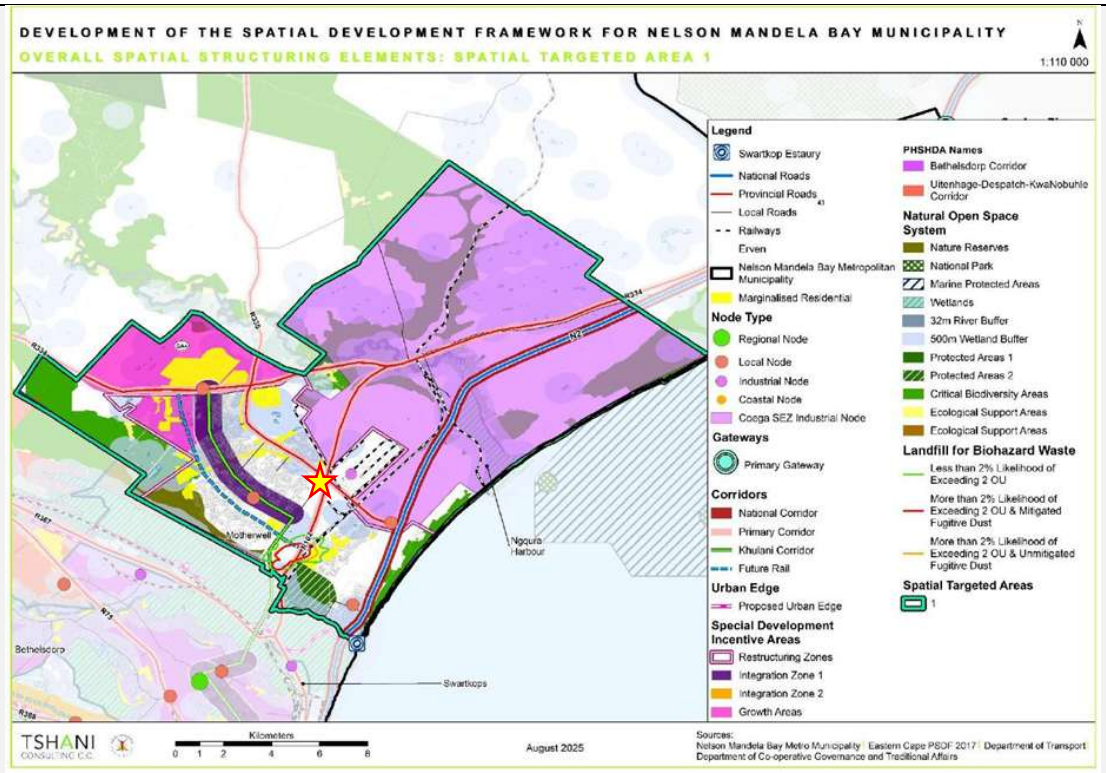

Figure 5: Map 22 of the SDF showing the overall spatial structuring elements within Spatial Targeted Area 1 in relation to the site shown by the yellow star.

The Municipal Draft SDF (2025) also has a '*Densification Strategy',* The proposed Scenario in the context of the Nelson Mandela Bay Area includes "*strengthening the existing major business routes and commuter routes in the Metro by the addition of high-density development alongside*", amongst others. The purpose of density proposals inside the Urban Edge is to "*encourage efficient use of land and services within existing urban areas*"; "*prioritise infill development, brownfield redevelopment, and densification to reduce pressure on undeveloped land*"; and "*allow higher densities where supported by infrastructure and aligned with the zoning parameters*." The proposed Industrial Park meets these requirements. As stated in the SDF the "*Nelson Mandela Bay Municipality (NMBM) is a key economic hub within the Eastern Cape, anchored by a strong industrial heritage in automotive manufacturing, logistics, and agro processing*."

Erf 409 (parent erf) was registered in 1965 for industrial use and has been developed/utilised for industrial purposes with an Industrial Zoning that involved continued industrial expansion on the property since 1965. In 2011 Erf 409 was subdivided (Erven 8741; 8740 and 8739) and Erven maintained the Industrial Zoning from the mother Erf. Erf 8741 was again subdivided in 2023 to create Erf 10301(a portion of Erf 8741) but maintains its Industrial Zoning. Permitted uses in terms of this zoning includes warehousing, storage, workshops and offices. Erf 10301 forms part of the built-up area as such it is regarded as inside the urban area as per NEMA definition.

The earliest development evident, according to available historic aerial photography, is before 1971 with the establishment of the GM SA facility (now located on Erf 8740 and 8739) which has expanded over the years and now covers the entire extent of these Erven. The existing Shoprite Checkers DC facility located on Erf 8741(to the east of the site) was constructed in 2012 and has recently been expanded (2024).

The proposed development will result in substantial financial investment within the area and will provide numerous employment opportunities which are required in this region. Beyond the sizable investment into the Gqebeha economy which is estimated at approximately R7.5 million annually, the project will create employment opportunities during construction and operational phase of the project with approximately 685 jobs being created over the lifespan of the project (temporary and permanent).

The proposed development will not contradict or conflict with the municipal IDP and SDF as the proposed site occurs within an industrial area and will be utilized for such purposes. There is a definite need for the proposed activity given the magnitude of the development and positive economic impacts for the Nelson Mandela Bay Metro as a whole (financial investment into the economy and employment opportunities). The site is zoned Industrial 1 and will be utilized for such purposes. The site is located within an urban area with available bulk service infrastructure.

According to the results indicated in the Aquatic & Terrestrial Ecology Impact Assessment (*EnviroSci*) several important habitats are located within the proposed development site and for the most part, the areas rated with the highest sensitivity have been avoided within the preferred layout. The project has thus made use of as many previously disturbed / developed areas as possible.

Therefore, with the mitigations, the overall significances of the impacts were rated as **Very Low** to **Low** and the ecological specialist has no objection to the project approval. This is based on the assumption that any protected or listed species that still remain will be relocated to the proposed open space area. All recommended mitigation measures have been included in the EMPr.

Indicate any benefits that the activity will have for society in general:

According to the NMBM IDP (2021), Nelson Mandela Bay Municipality continues to suffer the consequences of the most persistent drought in its history coupled with the impacts of the COVID-19 pandemic which began in early 2020. The impacts are exacerbated by the fact that the City has high levels of poverty, joblessness, homelessness, and a declining fiscus caused inter alia by decreased grant funding from National Treasury as well as a weakened national and local economy. Job creation and restoring the economy has been identified as a key priority. Emphasis is placed on economic turnaround through inter alia, the creation of an enabling environment for private sector investments to create jobs. The expected capital value of the activity on completion is estimated at around R1 Billion and a further R7.5 million is estimated to be generated by the proposed development on an annual basis. Furthermore, the expected value of employment opportunities during the development phase is estimated at around R220 million. These figures will assist the municipality and society by stimulating the local economy and providing job opportunities within the Gqeberha.

Spatial targeting and the elimination of spatial inequalities, as envisaged in the National Development Plan, is an underlying principle of the Urban Network approach, hence the focus of the IDP on the catalytic development of under-serviced city areas. The Urban Network Strategy identifies a number of network elements (CBD, hubs, growth areas) and allows for the identification of Integration Zones that link CBDs and hubs in which catalytic development is encouraged. Wells Estate, amongst other areas, has been identified as a growth area (secondary urban hub). The proposed development will have a positive local and regional economic impact, benefiting society in general.

Indicate any benefits that the activity will have for the local communities where the activity will be located:

The benefit for local communities associated with the proposed development will mainly be economic / job creation as detailed above. The expected capital value of the activity on completion is estimated at around R1 Billion and a further R7.5 million is estimated to be generated by the proposed development on an annual basis. Furthermore, the expected value of employment opportunities during the development phase is estimated at around R220 million. These figures will assist the municipality and society by stimulating the local economy and providing job opportunities within the Gqeberha.

10. APPLICABLE LEGISLATION, POLICIES AND/OR GUIDELINES

List all legislation, policies and/or guidelines of any sphere of government that are applicable to the application as contemplated in the EIA regulations, if applicable:

Title of legislation, policy or guideline:	Administering authority:	Date:
National Environmental Management Act (Act No. 107 of 1998) (NEMA):	DEDEAT	1998, as amended
EIA Regulations, 2014, promulgated in terms of NEMA	DEDEAT	2014, as amended
National Environmental Management: Biodiversity Act (Act No. 10 of 2004)	DEFF	2004, as amended
National Heritage Resources Act (Act No. 25 of 1999) (NHRA)	SAHRA / ECPHRA	1999
National Water Act (Act No. 36 of 1998) (NWA)	DWS	1998, as amended
Nelson Mandela Bay Municipality By-Laws	NMBM	-
Eastern Cape Vision 2030: Provincial Development Plan	NMBM	2014
Municipal Spatial Development Framework (MSDF)	NMBM	2025
Nelson Mandela Bay Municipal IDP	NMBM	2021
NMBM Bioregional Conservation Plan	DEDEAT	2018/ 2024
Section 24 of The Constitution of the Republic of South Africa	DEDEAT	1996
Agenda 21 – Action plan for sustainable development of the Department of Environmental Affairs and Tourism (DEAT)	DEAT / DEDEAT	1998
Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983) (CARA); NEMA and CARA identify and categorise invasive plants together with associated obligations on the landowner.	Department Agriculture / DEDEAT	1983, as amended

11. WASTE, EFFLUENT, EMISSION AND NOISE MANAGEMENT

11(a) Solid waste management

Will the activity produce solid construction waste during the construction/initiation phase?	YES [redacted]
If yes, what estimated quantity will be produced per month?	Unknown
How will the construction solid waste be disposed of (describe)?	

Waste management during the construction phase is the responsibility of the Contractor. The Contractor must establish a system acceptable to the ECO for control during execution of the works. Refuse refers to all construction debris (cement bags, rubble, timber, cans, nails, wire, spilt bitumen, glass, packaging, plastic, organic matter, etc.). Refuse generated during the execution phase of the works should be stored in an appropriate area on site, protected against wind dispersion and removed on a regular basis for disposal of at a permitted disposal site. No burning or burying of refuse on site should be allowed. Refuse bins must be watertight and wind-proof. Materials suitable for recycling to be sorted and stored in a marked bin to be disposed of at the municipal transfer facility.

The Contractor shall provide adequate refuse bins at all eating areas and ensure that they are used. Bins are to be cleared on a daily basis.

Refer to **Appendix F** EMPr.

Where will the construction solid waste be disposed of (describe)?

Municipal approved Transfer Station or Landfill Site as per the EMPr.

Will the activity produce solid waste during its operational phase?	YES [redacted]
If yes, what estimated quantity will be produced per month?	Unknown

How will the solid waste be disposed of (describe)?

Solid Waste will be collected by the NMBM and will be disposed of in line with the municipalities waste streams.

Where will the solid waste be disposed if it does not feed into a municipal waste stream (describe)?

N/A. See above.

If the solid waste (construction or operational phases) will not be disposed of in a registered landfill site or be taken up in a municipal waste stream, then the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

Can any part of the solid waste be classified as hazardous in terms of the relevant legislation?	[redacted] NO

If yes, inform the competent authority and request a change to an application for scoping and EIA.

Is the activity that is being applied for a solid waste handling or treatment facility?	[redacted] NO

If yes, then the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

11(b) Liquid effluent

Will the activity produce effluent, other than normal sewage, that will be disposed of in a municipal sewage system?	[redacted] NO
If yes, what estimated quantity will be produced per month? **N/A**	m^3
Will the activity produce any effluent that will be treated and/or disposed of on site?	[redacted] NO

If yes, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA. **N/A**

Will the activity produce effluent that will be treated and/or disposed of at another facility?	[redacted] NO

If yes, provide the particulars of the facility: **N/A**

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

Describe the measures that will be taken to ensure the optimal reuse or recycling of wastewater, if any:

N/A. Wastewater will not be recycled.

11(c) Emissions into the atmosphere

Will the activity release emissions into the atmosphere?	NO
If yes, is it controlled by any legislation of any sphere of government? **N/A**	

If yes, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA. **N/A**

If no, describe the emissions in terms of type and concentration:

N/A

11(d) Generation of noise

Will the activity generate noise?	YES	
If yes, is it controlled by any legislation of any sphere of government? ***Standard construction related noise.***		NO

If yes, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA. **N/A**

If no, describe the noise in terms of type and level:

Anticipated noise is related to construction vehicles and equipment during the construction phase and vehicular traffic during the operational phase. **Noise impact significance during the operational phase is expected to be low due to the property being located within an industrial area and the distance from residential areas.**

12. WATER USE

Please indicate the source(s) of water that will be used for the activity by ticking the appropriate box(es)

Municipal					
✓					

If water is to be extracted from groundwater, river, stream, dam, lake or any other natural feature, please indicate **N/A**

the volume that will be extracted per month: **N/A**	litres	
Does the activity require a water use permit from the Department of Water Affairs?		NO

If yes, please submit the necessary application to the Department of Water Affairs and attach proof thereof to this application if it has been submitted. **N/A**

13. ENERGY EFFICIENCY

Describe the design measures, if any, that have been taken to ensure that the activity is energy efficient:

The Applicant obtains EDGE Green Building Certification and Complies with the South African National Standards (SANS) 10400-XA (minimum requirements of the South African National Building Regulations on energy efficiency and environmental sustainability in building design).

In essence, EDGE Advanced certification recognizes buildings that achieve at least 40% energy savings and 20% savings in water and embodied energy in materials compared to standard practice, demonstrating exceptional resource efficiency and readiness for zero-carbon performance. What EDGE Advanced certification entails:

- EDGE is a green building certification system developed by the International Finance Corporation (IFC) for resource-efficient buildings (new and existing).
- At the base "EDGE Certified" level, a project must demonstrate at least 20% reduction in each of: energy use, water use, and embodied energy in materials (versus a local business-as-usual baseline).
- The EDGE Advanced level (sometimes described as "Zero Carbon Ready") is achieved when the project meets the base EDGE criteria (≥ 20% savings in water & embodied energy) plus a higher threshold for energy savings — commonly 40% or more energy reduction.
- After achieving Advanced, if the building goes further (for example 100% renewable energy supply on-site or via offsets) it may qualify for the highest level, often called "EDGE Zero Carbon".
- The certification process involves two main phases: a "Design" stage (preliminary certificate) and a "Post-construction / Site audit" stage (final certification).
- Benefits of Advanced level include better market differentiation, lower operational costs (energy + water), and alignment with higher sustainability / ESG goals.

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

A solar PV system is a key step toward advancing renewable energy and long-term sustainability for this development. With substantial roof space available, the initiative aims to deliver up to 1 MVA of clean energy, reducing reliance on traditional power sources and improving energy resilience. The Applicant is committed to driving sustainability across its portfolio, and this project reflects that vision.

SECTION B: SITE/AREA/PROPERTY DESCRIPTION

Important notes:

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

Section C Copy No. (e.g. A):	**N/A**

2. Paragraphs 1 - 6 below must be completed for each alternative.

3. Has a specialist been consulted to assist with the completion of this section? YES [redacted]

If YES, please complete declaration form (**Appendix G2**) for each specialist thus appointed:

All specialist reports must be contained in **Appendix D**.

1. GRADIENT OF THE SITE

Indicate the general gradient of the site.

Alternative S1:

Flat [redacted]

Alternative S2 (if any):

[redacted]

Alternative S3 (if any):

[redacted]

2. LOCATION IN LANDSCAPE

Indicate the landform(s) that best describes the site:

~~2.1 Ridgeline~~
~~2.2 Plateau~~
~~2.3 Side slope of hill/mountain~~
~~2.4 Closed valley~~
~~2.5 Open valley~~
2.6 Plain
~~2.7 Undulating plain / low hills~~
~~2.8 Dune~~
~~2.9 Seafront~~

3. GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE

Is the site(s) located on any of the following (tick the appropriate boxes)?

	Alternative S1:		Alternative S2 (if any):	Alternative S3 (if any):
Shallow water table (less than 1.5m deep)		NO		
Dolomite, sinkhole or doline areas		NO		
Seasonally wet soils (often close to water bodies)		NO		
Unstable rocky slopes or steep slopes with loose soil		NO		
Dispersive soils (soils that dissolve in water)		NO		
Soils with high clay content (clay fraction more than 40%)		NO		
Any other unstable soil or geological feature		NO		
An area sensitive to erosion		NO		

If you are unsure about any of the above or if you are concerned that any of the above aspects may be an issue of concern in the application, an appropriate specialist should be appointed to assist in the completion of this section. (Information in respect of the above will often be available as part of the project information or at the planning sections of local authorities. Where it exists, the 1:50 000 scale Regional Geotechnical Maps prepared by the Council for Geo Science may also be consulted).

4. GROUNDCOVER

Indicate the types of groundcover present on the site:

4.1 Natural veld – good condition [E]

Grassridge Bontveld occurs on shallower, gravelly clayey soil and extends from the Coega Estuary to the Swartkops Estuary where it transitions into Sundays Valley Thicket vegetation. Grassridge Bontveld vegetation, restricted to the karst landscape created in the underlying limestone, consists of scattered, low bushclumps of Thicket species, in a matrix of open grassland which contains species characteristic of Fynbos, Grassland and Succulent Karoo vegetation types. Bushclumps are dominated by Aloe africana, Chrysanthemoides monilifera, Colpoon compressum, Euclea undulata, Pterocelastrus tricuspidatus and Sideroxylon inerme. The grassy matrix in Grassridge Bontveld is dominated by Cynodon dactylon, Eustachys paspaloides, Themeda triandra, Ficinia truncata, Acmadenia obtusata, Disparago ericoides, Euryops ericifolius, Gazania krebsiana, Gibbaria scabra, Jamesbrittenia microphylla, Lobostemon trigonus, Monsonia emarginata, Nylandtia spinosa, Osteospermum imbricatum and Pteronia incana. These grassy / fynbos areas also included high number of the small Euphorbia

species (E. globosa, & E. obesa), Pachypodium bispinosum and P. succulentum and Fockea gracilis plants all of which are protected.

The proposed site is located within Grassridge Bontveld vegetation type and thus all of these species listed above were observed with small, isolated areas, with only one small clump (thicket / grassland mosaic) remaining (4% of the site).

~~4.2 Natural veld – scattered aliens~~ ~~E~~

4.3 Natural veld with heavy alien infestation E

The remainder of the site (96%), is heavily grazed by goats and cattle, used for illegal dumping of covered by alien *Acacia cyclops, Acacia longifolia, Acacia saligna, Lantana camara* and *Opuntia ficus-indica*.

~~4.4 Veld dominated by alien species~~ ~~E~~

~~4.5 Gardens~~

~~4.6 Sport field~~

~~4.7 Cultivated land~~

~~4.8 Paved surface~~

~~4.9 Building or other structure~~

~~4.10 Bare soil~~

The location of all identified rare or endangered species or other elements should be accurately indicated on the site plan(s).

Natural veld - good condition[E]	Natural veld with heavy alien infestation[E]

If any of the boxes marked with an "[E] "is ticked, please consult an appropriate specialist to assist in the completion of this section if the environmental assessment practitioner doesn't have the necessary expertise.

PLEASE REFER TO THE SPECIALIST STUDIES UNDERTAKEN IN APPENDIX D.

5. LAND USE CHARACTER OF SURROUNDING AREA

Indicate land uses and/or prominent features that currently occur **within a 500m radius** of the site and give description of how this influences the application or may be impacted upon by the application:

5.1 Natural area

The development property is bounded by a small undeveloped area to the north and larger pockets to the south. The development property is zoned Industrial and is found within an Industrial Area. The surrounding natural areas are heavily degraded as they are being used as informal dumpsites and/ or as grazing by informal residents. However, no impacts are anticipated on neighbouring sites.

~~5.2 Low density residential~~

5.3 Medium density residential

The Motherwell residential area is located north, north-west of the application property. Due to the nature of the proposed activity and the ''Industrial'' zoning of the property, the proposed development will not impact on the residential area.

5.4 High density residential

The Motherwell residential area is located north, north-west of the application property. Due to the nature of the proposed activity and the ''Industrial'' zoning of the property, the proposed development will not impact on the residential area.

5.5 Informal residential

A small informal residential community illegally occupies municipal land to the south-east. This community has set up informal small holdings within the neighbouring municipal land on which small-scale subsistence farming is being undertaken. The proposed Stormwater Channel will traverse this area owned by the Municipality. The channel will be a municipal service to address stormwater management of the larger area. The necessary arrangements for the construction of the channel will be facilitated to address the temporarily disruption of these informal residents.

5.6 Retail commercial & warehousing

The Shoprite Checkers DC and Isuzu Motors Technical Centre is located to the north-east. Due to the nature of the proposed development and the industrial zoning of the area, the proposed activity will not have an impact on the neighbouring facility.

5.7 Light industrial

Industrial development located to the far north-east of the development site, within the Markman industrial area, will not be impacted upon.

~~5.8 Medium industrial~~ ~~AN~~
~~5.9 Heavy industrial~~ ~~**AN**~~
~~5.10 Power station~~
~~5.11 Office/consulting room~~
~~5.12 Military or police base/station/compound~~
~~5.13 Spoil heap or slimes dam~~~~**A**~~
~~5.14 Quarry, sand or borrow pit~~
~~5.15 Dam or reservoir~~
~~5.16 Hospital/medical centre~~
~~5.17 School~~
~~5.18 Tertiary education facility~~
~~5.19 Church~~
~~5.20 Old age home~~
~~5.21 Sewage treatment plant~~~~**A**~~
~~5.22 Train station or shunting yard~~ ~~**N**~~
~~5.23 Railway line~~ ~~**N**~~

5.24 Major road (4 lanes or more) **N**

R102 (Old Grahamstown Road)

A 6.8m wide provincial road classified as a minor arterial. The road has a single carriageway in both directions without any shoulders or kerbs and acts as a distributor between Swartkops and Markman Industrial Area.

M Kaulela Street

This street is 8.7m wide and classified as both a minor arterial (section north-west of Dibanisa Road intersection) and a local road (section south- east of Dibanisa Road intersection).

R335 (Addo Road)

The R335 is classified as a mobility arterial with two 3.5m wide lanes and a 3m wide shoulder in both directions (dual carriageway). This road has a 4.5m wide grassed median and raised pedestrian crossings are provided along either side of the R335.

Access to Erf 10301 will be from M Kaulela Street as shown on the site development plan (**Appendix C**). No impacts on the surrounding road network are anticipated. The zoning of the property is for Industrial Use within an industrial area.

~~5.25 Airport~~ **N**
~~5.26 Harbour~~
~~5.27 Sport facilities~~
~~5.28 Golf course~~
~~5.29 Polo fields~~

5.30 Filling station **H**

A diesel filling station specifically for the Shoprite Checkers DC is located on the adjacent erf (Erf 8741). No impacts will result on this filling station.

~~5.31 Landfill or waste treatment site~~
~~5.32 Plantation~~
~~5.33 Agriculture~~

5.34 River, stream or wetland

A small depression (Endorheic Pans) is located to the south-west (off site). This is mostly associated with the Bontveld vegetation units and are unique within the environment due their association with the limestone geology found within the region and are formed through karst dissolution of the underlying calcrete. No impact is anticipated as the catchment of this system is well away from the site and disconnected by current road infrastructure.

~~5.35 Nature conservation area~~
~~5.36 Mountain, koppie or ridge~~
~~5.37 Museum~~
~~5.38 Historical building~~
~~5.39 Protected Area~~
~~5.40 Graveyard~~
~~5.41 Archaeological site~~
~~5.42 Other land uses (describe)~~

If any of the boxes marked with an "N "are ticked, how will this impact / be impacted upon by the proposed activity.

Refer to 5.24 Major road (4 lanes or more) above.

If any of the boxes marked with an "An" are ticked, how will this impact / be impacted upon by the proposed activity.

No boxes here have been ticked.

If any of the boxes marked with an "H" are ticked, how will this impact / be impacted upon by the proposed activity.

Refer to 5.30 Filling station above.

6. CULTURAL/HISTORICAL FEATURES

Are there any signs of culturally or historically significant elements, as defined in section 2 of the National Heritage Resources Act, 1999, (Act No. 25 of 1999), including Archaeological or palaeontological sites, on or close (within 20m) to the site?		NO
	N0	
If YES, explain:	N/A	
If uncertain, conduct a specialist investigation by a recognised specialist in the field to establish whether there is such a feature(s) present on or close to the site.		
Briefly explain the findings of the specialist:	Jenna Lavin undertook a Heritage NID and Screener (**Appendix D4**) which has been submitted to ECPHRA: Based on the extensively disturbed nature of the area proposed for development, it is very unlikely that the proposed development will impact on significant, in situ archaeological resources. In addition, there are clearly no structures of any kind located within the proposed development area which may have heritage significance. As such, it is recommended that no further archaeological assessments are required. However, should any archaeological resources or human remains be uncovered during the course of construction, work must cease and ECPHRA must be notified. It is also very unlikely that significant palaeontological resources will be impacted by the proposed development. However, it is recommended that Chance Finds Procedure be adopted and implemented throughout the construction phase of the development.	
Will any building or structure older than 60 years be affected in any way?		NO
Is it necessary to apply for a permit in terms of the National Heritage Resources Act, 1999 (Act 25 of 1999)?	YES	

If yes, please submit or, make sure that the applicant or a specialist submits the necessary application to SAHRA or the relevant provincial heritage agency and attach proof thereof to this application if such application has been made.

*A Heritage NID and Screener was submitted on the 28 October 2025 via SAHRIS. Please refer to **Appendix D4**. Proof of submission shown in Figure 6 below. ECPHRA agreed with the findings in their 'Final Comment' dated 27 November 2025 (**Appendix E7**).*

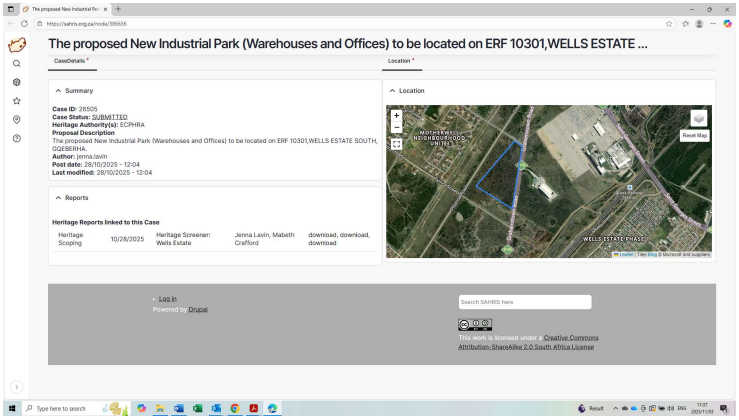

Figure 6: Proof of SAHRIS submission.

SECTION C: PUBLIC PARTICIPATION

This section will be updated after the initial Public Participation Process is completed.

1. ADVERTISEMENT

The person conducting a public participation process must take into account any guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties of the application which is subjected to public participation by—

(a) fixing a notice board (of a size at least 60cm by 42cm; and must display the required information in lettering and in a format as may be determined by the competent authority) at a place conspicuous to the public at the boundary or on the fence of—
  (i) the site where the activity to which the application relates is or is to be undertaken; and
  (ii) any alternative site mentioned in the application;
(b) giving written notice to—
  (i) the owner or person in control of that land if the applicant is not the owner or person in control of the land;
  (ii) the occupiers of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;
  (iii) owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;
  (iv) the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;
  (v) the municipality which has jurisdiction in the area;
  (vi) any organ of state having jurisdiction in respect of any aspect of the activity; and
  (vii) any other party as required by the competent authority;
(c) placing an advertisement in—
  (i) one local newspaper; or
  (ii) any official *Gazette* that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;
(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or local municipality in which it is or will be undertaken: Provided that this paragraph need not be complied with if an advertisement has been placed in an official *Gazette* referred to in subregulation 54(c)(ii); and
(e) using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desiring of but unable to participate in the process due to—
  (i) illiteracy;
  (ii) disability; or
  (iii) any other disadvantage.

2. CONTENT OF ADVERTISEMENTS AND NOTICES

A notice board, advertisement or notices must:

(a) indicate the details of the application which is subjected to public participation; and
(b) state—
  (i) that the application has been submitted to the competent authority in terms of these Regulations, as the case may be;
  (ii) whether basic assessment or scoping procedures are being applied to the application, in the case of an application for environmental authorisation;

(iii) the nature and location of the activity to which the application relates;
(iv) where further information on the application or activity can be obtained; and
(iv) the manner in which and the person to whom representations in respect of the application may be made.

3. PLACEMENT OF ADVERTISEMENTS AND NOTICES

Where the proposed activity may have impacts that extend beyond the municipal area where it is located, a notice must be placed in at least one provincial newspaper or national newspaper, indicating that an application will be submitted to the competent authority in terms of these regulations, the nature and location of the activity, where further information on the proposed activity can be obtained and the manner in which representations in respect of the application can be made, unless a notice has been placed in any *Gazette* that is published specifically for the purpose of providing notice to the public of applications made in terms of the EIA regulations.

Advertisements and notices must make provision for all alternatives.

4. DETERMINATION OF APPROPRIATE MEASURES

The practitioner must ensure that the public participation is adequate and must determine whether a public meeting or any other additional measure is appropriate or not based on the particular nature of each case. Special attention should be given to the involvement of local community structures such as Ward Committees, ratepayers associations and traditional authorities where appropriate. Please note that public concerns that emerge at a later stage that should have been addressed may cause the competent authority to withdraw any authorisation it may have issued if it becomes apparent that the public participation process was inadequate.

5. COMMENTS AND RESPONSE REPORT

The practitioner must record all comments and respond to each comment of the public before the application is submitted. The comments and responses must be captured in a comments and response report as prescribed in the EIA regulations and be attached to this application. The comments and response report must be attached under **Appendix E**. ***This will be incorporated after the initial Public Participation Process is completed***.

6. AUTHORITY PARTICIPATION

Authorities are key interested and affected parties in each application and no decision on any application will be made before the relevant local authority is provided with the opportunity to give input. The planning and the environmental sections of the local authority must be informed of the application at least 30 (thirty) calendar days before the submission of the application.

List of authorities informed:

NAME	OCCUPATION/AFFILIATION
Andries Struwig (Assistant Director)	Eastern Cape Department: Economic Development, Environmental Affairs & Tourism (DEDEAT)
Charmaine Struwig	
Monde Manga	EC Department of Transport
Ayanda Mncwabe Mama	Eastern Cape Provincial Heritage Resources Authority (ECPHRA)
Natasha Higgitt	South African Heritage Resources Agency (SAHRA)

NAME	OCCUPATION/AFFILIATION
(Heritage Officer)	
Nokukhanya Khumalo (Heritage Officer)	
Adv. Lungisa Malgas (Chief Executive Office)	
Mzukisi Maneli	Department: Water & Sanitation (DWS)
Portia Makhanya: Chief Director	
Siyabonga Ngcobo	
Dr. I Burnand (Assistant Director)	Department of Forestry, Fisheries and the Environment (DFFE)
Nomantombazana Gazi	
Mr Gcinile Dumse	Department of Agriculture
Danfred Adams	South African National Roads Agency (SANRAL)
Mr Simvuyele Bakumeni	Dept of Rural Development and Agrarian Reform Eastern Cape (DRDAR)
Wiseman Goqwana	
Mr Patrick Futshane	
Ms. Londeka Jilimane	Eastern Cape Parks and & Tourism Agency (ECPTA)
Phucuka Penelope Penxa (HOD) Ms Olona Njotini	Eastern Cape Dept Public Works & Infrastructure
J. Geeringh [Servitude over property]	ESKOM
Mr N Peterson	Sarah Baartman District Municipality
Mr Matthew Hills	NMBM - Engineer Infrastructure & Engineering Directorate Planning and Research Division
Mr. Yussuf Gaffore	NMBM – Roads, Stormwater and Transportation
Mkhuseli John Jack	NMBM - Economic Development Tourism and Agriculture
John Mervyn Mitchell	NMBM - Infrastructure and Engineering
Buyiswa Deliwe	NMBM - Manager: Environmental Health (Air & Noise Pollution)
Thembi Blaai	NMBM - Acting Manager Environmental Health Services
Pamela Howes	NMBM - Secretary: Environmental Management
Jill Miller	NMBM – Environmental Management
Mthulisi Msimanga	NMBM – Director: Land Use and Management
Noxolo Nqwazi	NMBM Chief Operating Officer Acting City Manager

NAME	OCCUPATION/AFFILIATION
Maryka du Plessis	NMBM - Secretary to Director: Integrated Development Plan
Nyasha Chamburuka	NMBM – Town Planning
Allister Jordan [Remainder of Erf 1 & Remainder of Erf 16614, Wells Estate]	NMBM – Acting Director Properties and Planning
Harold Gadlamba	NMBM - Senior Technician Electricity and Energy Directorate: Projects -Planning
Cllr Nomthandazo Dyantyi	NMBM Ward 23 Councillor

List of authorities from whom comments have been received:

This section will be completed after the initial Public Participation Process has been undertaken. No comments have been received to date.

7. CONSULTATION WITH OTHER STAKEHOLDERS

Note that, for linear activities, or where deviation from the public participation requirements may be appropriate, the person conducting the public participation process may deviate from the requirements of that subregulation to the extent and in the manner as may be agreed to by the competent authority. N/A

Any stakeholder that has a direct interest in the site or property, such as **servitude holders and service providers**, should be informed of the application at least 30 (thirty) calendar days before the submission of the application and be provided with the opportunity to comment.

Has any comment been received from stakeholders?	YES	NO

If "YES", briefly describe the feedback below (also attach copies of any correspondence to and from the stakeholders to this application):

This section will be completed after the initial Public Participation Process has been undertaken. No comments have been received to date.

SECTION D: IMPACT ASSESSMENT

The assessment of impacts must adhere to the minimum requirements in the EIA Regulations, 2014 as amended, and should take applicable official guidelines into account. The issues raised by interested and affected parties should also be addressed in the assessment of impacts.

1. ISSUES RAISED BY INTERESTED AND AFFECTED PARTIES

List the main issues raised by interested and affected parties.

This section will be completed after the Public Participation Process has been undertaken.

Response from the practitioner to the issues raised by the interested and affected parties (A full response must be given in the Comments and Response Report that must be attached to this report):

This section will be completed after the Public Participation Process has been undertaken.

2.IMPACTS THAT MAY RESULT FROM THE PLANNING AND DESIGN, CONSTRUCTION, OPERATIONAL, DECOMMISSIONING AND CLOSURE PHASES AS WELL AS PROPOSED MANAGEMENT OF IDENTIFIED IMPACTS AND PROPOSED MITIGATION MEASURES

List the potential direct, indirect and cumulative property/activity/design/technology/operational alternative related impacts (as appropriate) that are likely to occur as a result of the planning and design phase, construction phase, operational phase, decommissioning and closure phase, including impacts relating to the choice of site/activity/technology alternatives as well as the mitigation measures that may eliminate or reduce the potential impacts listed.

1. PREFERRED ALTERNATIVE (Alternative 1 – Appendix C1):

This assessment considers direct, indirect, and cumulative impacts to the natural and socio-economic environment that may arise during the construction and operational phases of the proposed development (no decommissioning or closure phases applies to this development). Each of the impacts are explained below along with respective mitigation measures and impact tables.

A – TERRESTRIAL IMPACTS (Refer to Appendix D1)

Impact 1: Loss of vegetation and in particular species / habitats that are listed as Vulnerable:

Issue	The clearance of vegetation and destruction of habitats, especially those that are listed as Vulnerable.	
Description of Impact		
During construction, clearing of the development areas, and associated infrastructure will be required. However, in line with the mitigation hierarchy, this has resulted in the revision of the proposed layout to avoid any Very High Sensitivity areas. The preferred layout as shown In Figure 9 was evaluated and based on the results of this assessment the development area will be located within Low sensitivity area		
Type of Impact	Indirect	
Nature of Impact	Negative	
Phases	Construction	
Criteria	**Without Mitigation**	**With Mitigation**
Intensity	Medium	Low
Duration	Long-term	Long-term
Extent	Local	Local

Consequence	Medium	Low
Probability	Definite	Probable
Significance	Medium -	Low -
Degree to which impact can be reversed	Medium	
Degree to which impact may cause irreplaceable loss of resources	Medium	
Degree to which impact can be mitigated	Low-	
Mitigation actions		
The following measures are recommended:	• All temporary works areas (laydowns and camps), where possible, must be placed in previously disturbed areas within the site, including any temporary access roads or storage areas, e.g. in areas where alien vegetation is dense and could be cleared for this purpose. • Comply with search and rescue specifications as per the issued permits. • The revegetation of any temporary sites, as well as any previously degraded areas, must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications in particular the remaining open space areas • Alien vegetation management must be initiated at the beginning of the construction period.	
Monitoring		
The following monitoring is recommended:	• Regeneration of alien vegetation must be monitored once all areas have been cleared, forming part of a long term alien vegetation management plan within any remaining open space areas	
Cumulative impacts		
Nature of cumulative impacts	Additional loss of sensitive vegetation / habitats related to other development within the region, most of which will result in additional clearing of Bonteveld areas.	
Rating of cumulative impacts	**Without Mitigation**	**With Mitigation**
	High -	Medium -

Impact 2: Loss and/or Fragmentation of Faunal Habitat:

Issue	Vegetation clearing activities will result in the loss and / or fragmentation of critical corridors that connect faunal habitats	
Description of Impact		
During construction, clearing of the development areas, faunal will also be disturbed and or result in loss of habitat and movement corridors. However, this impact is expected to be limited as most of the faunal communities present are mobile or for the most part the habitat is already disturbed or disconnected		
Type of Impact	Indirect	
Nature of Impact	Negative	
Phases	Construction	
Criteria	**Without Mitigation**	**With Mitigation**
Intensity	Medium	Low
Duration	Long-term	Long-term
Extent	Local	Local
Consequence	Medium	Low
Probability	Definite	Probable
Significance	Medium -	Low -
Degree to which impact can be reversed	Medium	

Degree to which impact may cause irreplaceable loss of resources	Medium	
Degree to which impact can be mitigated	Low -	
Mitigation actions		
The following measures are recommended:	• Any protected or listed species that are mentioned in this report, must be relocated with the requisite permits in place.	
Monitoring		
The following monitoring is recommended:	• The revegetation of any temporary sites, as well as any previously degraded areas, must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications in particular the remaining open space areas • Alien vegetation management must be initiated at the beginning of the construction period.	
Cumulative impacts		
Nature of cumulative impacts	Additional loss of sensitive vegetation / habitats related to other development within the region, most of which will result in additional clearing of Bontveld areas.	
Rating of cumulative impacts	**Without Mitigation**	**With Mitigation**
	High -	Medium

Impact 3: The potential spread of alien vegetation:

Issue	Several Alien Invasive Species were found present on the site, and included the following species: • *Acacia longifolia* • *Acacia cyclops* • *Opuntia ficus-indica* These species in particular have the ability to alter vegetation units and drive down habitat complexity and species diversity.	
Description of Impact		
• Biodiversity Loss: Alien species, particularly aggressive invaders like Acacia and Prickly Pear, often outcompete indigenous species for resources, such as light, water, and nutrients, leading to a decline in indigenous plant diversity. This results in a reduction in biodiversity, as indigenous plants, which provide food and shelter for a range of local fauna, are displaced by non-indigenous species that may not support the same wildlife populations. The loss of indigenous plants can also disrupt local pollination systems and food webs, affecting a wide range of species. • Ecosystem Functionality Disruption: The introduction and spread of alien species can disrupt key ecological processes, such as water infiltration, nutrient cycling, and soil stabilisation. Invasive plants often have different water and nutrient requirements compared to native vegetation, leading to altered soil properties and reduced soil health. This impacts ecosystem functions like water purification and carbon sequestration, which are critical for mitigating climate change and maintaining environmental balance. • Habitat Degradation and Fragmentation: Alien species can cause further habitat fragmentation by altering the structure of existing ecosystems. As these invaders spread, they create barriers for indigenous wildlife, limiting their movement and access to resources. This fragmentation can lead to isolated populations, reducing genetic diversity and increasing the vulnerability of species to environmental stressors, disease, and predation. Over time, this isolation can lead to local extinctions of species that are dependent on intact, healthy habitats. • Increased Vulnerability to Other Environmental Threats: Areas dominated by alien vegetation are often less resilient to other environmental threats, such as drought, fire, and climate change. For example, many invasive species are more fire-prone than indigenous vegetation, increasing the risk of wildfires and further destabilizing the ecosystem. Additionally, the increased presence of alien species may reduce the natural resilience of the ecosystem to recover from other disturbances.	
Type of Impact	Indirect	
Nature of Impact	Negative	
Phases	Construction	
Criteria	**Without Mitigation**	**With Mitigation**
Intensity	Medium	Low
Duration	Long-term	Long-term

Extent	Local	Local
Consequence	Medium	Low
Probability	Definite	Probable
Significance	Medium -	Low -
Degree to which impact can be reversed	Medium	
Degree to which impact may cause irreplaceable loss of resources	Medium	
Degree to which impact can be mitigated	Low -	
Mitigation actions		
The following measures are recommended:	• All temporary works areas (laydowns and camps)should, where possible, only be placed in previously disturbed areas within the site, and this includes any temporary access roads or storage areas. • The revegetation of any temporary sites, as well as any previously degraded areas, must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications in particular the remaining open space areas • Alien vegetation management must be initiated at the beginning of the construction period	
Monitoring		
The following monitoring is recommended:	• Regeneration of alien vegetation must be monitored once all areas have been cleared, forming part of a long term alien vegetation management plan especially for any remaining opens space areas	
Cumulative impacts		
Nature of cumulative impacts	Additional loss of sensitive vegetation / habitats related to other development within the area, most of which will result in additional clearing of Bontveld areas.	
Rating of cumulative impacts	**Without Mitigation**	**With Mitigation**
	High -	Medium-

B – AQUATIC IMPACTS (Refer to Appendix D1)

The proposed development has avoided all aquatic systems.

Impact 4: Loss of wetland habitat and any functional corridors:

Issue	The proposed layout will avoid any important wetland features
Description of Impact	
The potential loss of wetland habitat and any associated functional corridors during the construction can lead to a range of environmental and ecological impacts. The loss of these habitats can have far-reaching consequences, both within the immediate project area and in surrounding ecosystems. These ecosystems play an essential role in maintaining local biodiversity and water cycles. However, the proposed development poses risks to the integrity of these systems. The following are key consequences of the potential loss or disturbance of wetland habitat and functional corridors: • Biodiversity Loss: Wetlands, particularly pans and depressions, provides for an important habitat for a variety of specialised plant and animal species, including aquatic and semi-aquatic species. Disturbances such as vegetation clearing, soil compaction, and changes in water flow can destroy or degrade these habitats. This leads to the decline or local extinction of species that depend on these wetlands, including rare or threatened species. • Aquatic Species Vulnerability: Many of the species in these areas are adapted to specific hydrological conditions. Changes in water flow, water quality, or depth could disrupt critical life cycles such as feeding, breeding, and migration, affecting the health of aquatic communities. • Invasive Species Introduction: Disturbance during construction can create opportunities for invasive species to infiltrate these areas. These invaders often outcompete indigenous species, altering the ecological balance and further degrading the wetland ecosystem. • Hydrological Disruption: Wetlands and pans are important in regulating water flow and maintaining groundwater recharge. Disturbance from construction activities could disrupt natural water accumulation and drainage, leading to changes in	

hydrology. This could result in reduced water availability and the breakdown of the ecosystem services these wetlands provide, such as flood mitigation and groundwater replenishment.

- Ecosystem Service Loss: Wetlands provide numerous ecosystem services that benefit both the natural environment and surrounding human populations. These services include water purification, carbon sequestration, and soil stabilization. Any degradation or loss of wetland habitats would impair these services, potentially leading to poorer water quality, increased carbon emissions, and reduced soil stability, which would negatively affect local biodiversity and water resources.
- Wildlife Habitat Fragmentation: Wetlands are critical habitat corridors that support movement and migration for various species. The fragmentation of wetland areas through development can isolate populations, making species more vulnerable to inbreeding, extinction, or reduced resilience to environmental changes. The destruction or alteration of wetland corridors may further exacerbate the challenges faced by wildlife, as they rely on these habitats for movement, breeding, and feeding.
- Impact on Soil Integrity and Water Quality: The soils in wetland depressions are typically indicative of ephemeral systems and show signs of periodic inundation, gleying, and iron nodules—important markers of soil saturation and anaerobic conditions. Construction activities that affect these soils could compromise their integrity, leading to reduced filtration capacity, increased sedimentation, and a higher risk of contamination of the surrounding water systems. This would disrupt the natural water purification processes and reduce the overall health of the wetland ecosystem.

The study area hydrology is characterised by localised ephemeral surface water flows, and several pans and depressions were identified. These depressions are critical wetland ecosystems, where water typically accumulates in a central area.

The Ecological Importance and Sensitivity of the pans within 500m of the project area (i.e. its importance to the maintenance of ecologic diversity and function) are considered High.

Type of Impact	Indirect	
Nature of Impact	Negative	
Phases	Construction	
Criteria	**Without Mitigation**	**With Mitigation**
Intensity	Medium	Medium
Duration	Long-term	Medium-Term
Extent	Local	Local
Consequence	Medium	Low
Probability	Definite	Possible
Significance	Medium -	Very Low -
Degree to which impact can be reversed	Medium	
Degree to which impact may cause irreplaceable loss of resources	Medium	
Degree to which impact can be mitigated	Low -	
Mitigation actions		
The following measures are recommended:	• The preferred site plan will avoid the wetland and its catchment thus not direct mitigations are required	
Monitoring		
The following monitoring is recommended:	• Any concentrated runoff and or erosion where observed must be rectified with the appropriate stormwater management measures, e.g. gabions, reno mattresses or energy dissipators, and not be discharged into any natural wetland features	
Cumulative impacts		
Nature of cumulative impacts	Additional loss of sensitive vegetation / habitats related to other development within the area, most of which will result in additional clearing of wetland areas.	
Rating of cumulative impacts	**With Mitigation**	**With Mitigation**
	High -	Medium-

Impact 5: Changes to the hydrological regime and increased potential for erosion:

Description of Impact		
Any hard surfaces created by the project, that will generate stormwater runoff have the ability to impact the current hydrological regime and thus create erosion through the concentration of flows. Construction activities may result in significant alterations to the local hydrological regime and an increased risk of erosion. These impacts are particularly relevant in areas where wetlands, pans, or other sensitive ecosystems are present. Changes to the natural flow and drainage patterns can have cascading effects on both the terrestrial and aquatic environments. • Habitat Degradation: Pans and depressions often depend on specific hydrological conditions, including seasonal water inputs and natural drainage patterns, to sustain their ecological integrity. Disturbances caused by construction activities, such as vegetation clearing, soil compaction, and alterations to surface water flows, may disrupt these conditions. Changes to the hydrological regime, such as reduced water infiltration or increased runoff, could lead to the drying out of these systems or prolonged inundation. These disruptions would degrade the habitat quality, affecting the flora and fauna that rely on these wetlands for survival. • Erosion and Sedimentation: Construction activities in or near wetland ecosystems often disturb the soil, exposing it to erosion by wind and water. Increased runoff from altered landscapes can exacerbate soil erosion, resulting in sedimentation of nearby wetlands and water bodies. Sediment accumulation in pans can smother aquatic habitats, reduce water quality, and disrupt the breeding and feeding patterns of wetland-dependent species. Over time, excessive sedimentation may alter the physical structure of these ecosystems, diminishing their ability to function as natural water storage and filtration systems.		
Type of Impact	Indirect	
Nature of Impact	Negative	
Phases	Construction	
Criteria	**Without Mitigation**	**With Mitigation**
Intensity	Very Low	Medium
Duration	Long-term	Medium-Term
Extent	Local	Local
Consequence	Low	Low
Probability	Probable	Possible
Significance	Low -	Very Low -
Degree to which impact can be reversed	Medium	
Degree to which impact may cause irreplaceable loss of resources	Medium	
Degree to which impact can be mitigated	High -	
Mitigation actions		
The following measures are recommended:	• The preferred option is recommended as all aquatic systems can be avoided. • No stormwater discharged may be directed to delineated aquatic zone. • A construction and operational stormwater management plan must be developed post EA, detailing the structures and actions that must be installed to prevent the increase of surface water flows directly into any natural systems. • Effective stormwater management must include measures to slow, spread and deplete the energy of concentrated flows thorough effective stabilisation (gabions and Reno mattresses) and the re-vegetation of any disturbed areas	
Monitoring		
The following monitoring is recommended:	• Stormwater systems must be inspected on an annual basis to ensure these are functional.	

	• Any concentrated runoff and or erosion where observed must be rectified with the appropriate stormwater management measures, e.g. gabions, reno mattresses or energy dissipators	
Cumulative impacts		
Nature of cumulative impacts	Additional loss of sensitive vegetation / habitats related to other development within the region, most of which will result in additional clearing of wetland areas.	
Rating of cumulative impacts	**With Mitigation**	**With Mitigation**
	High -	Medium-

Impact 6: Changes to water quality:

Issue	The construction and operation of the proposed development have the potential to alter the water quality of nearby aquatic systems, including wetland pans, and associated groundwater resources. The introduction of pollutants, sediments, and other contaminants into aquatic systems can degrade water quality, negatively impacting both ecological and human systems dependent on these resources.	
Description of Impact		
The construction and operation of the proposed development have the potential to alter the water quality of nearby aquatic systems, including wetlands, pans, and associated groundwater resources. The introduction of pollutants, sediments, and other contaminants into aquatic systems can degrade water quality, negatively impacting both ecological and human systems dependent on these resources. These areas are integral to the regional hydrological and ecological functions, and alterations to their water quality can lead to the following consequences: The quality of water in the ephemeral systems, including depressions and pans, within the study area is critical for maintaining biodiversity and ecosystem functions. Alterations to water quality, whether from increased sedimentation, nutrient enrichment, or pollutants associated with construction activities, can lead to a range of negative consequences. The degradation of water quality can result in the loss of sensitive aquatic species, which are adapted to the fluctuating conditions typical of these systems. Increased nutrient loading, for example, can trigger algal blooms, reducing oxygen levels and suffocating aquatic organisms. Furthermore, changes in water chemistry or the introduction of pollutants can directly impact aquatic life, including fish, amphibians, and invertebrates, disrupting the delicate balance of these ecosystems. Poor water quality can also hinder key ecosystem functions. Wetlands and pans play a vital role in water filtration and groundwater recharge. The decline in water quality due to increased runoff or pollution can impair these natural processes, reducing water availability and affecting the health of surrounding ecosystems. These systems also act as natural flood buffers, absorbing excess water during rainfall events. However, reduced water quality can compromise this flood mitigation role, increasing the vulnerability of the surrounding areas to flooding. For migratory and resident birds, the quality of water in these wetlands is essential for feeding, breeding, and survival. Degraded water quality, particularly through the accumulation of pollutants or altered salinity, can diminish food availability and disrupt breeding cycles, leading to a decline in bird populations. Changes in water quality threaten the viability of these wetlands as habitats for a wide range of species. This degradation can result in habitat fragmentation, reducing connectivity between wetland ecosystems and further contributing to biodiversity loss. Consequently, maintaining water quality is critical not only for protecting the species that depend on these wetlands but also for preserving the broader ecological integrity of the region.		
Type of Impact	Indirect	
Nature of Impact	Negative	
Phases	Construction	
Criteria	**Without Mitigation**	**With Mitigation**
Intensity	Medium	Low
Duration	Long-term	Medium-Term
Extent	Local	Local
Consequence	Medium	Low
Probability	Probable	Possible
Significance	Medium	Very Low -
Degree to which impact can be reversed	Medium	

Degree to which impact may cause irreplaceable loss of resources	Medium	
Degree to which impact can be mitigated	Medium-	
Mitigation actions		
The following measures are recommended:	• All construction materials including fuels and oil should be stored in demarcated areas that are contained within berms / bunds to avoid spread of any contamination. • Washing and cleaning of equipment should also be done in berms or bunds, in order to trap any cement and prevent excessive soil erosion. Mechanical plant and bowsers must not be refuelled or serviced within or directly adjacent to any channel. It is therefore suggested that all construction camps, lay down areas, batching plants or areas and any stores should be located further than a temporary 85 m from a watercourse and wetland. Chemicals used for construction must be stored safely on site and surrounded by bunds. Chemical storage containers must be regularly inspected so that any leaks are detected early; • Develop and implement emergency plans in case of any spillages; • Littering and contamination of water sources during construction must be prevented by effective construction camp management; • Emergency plans must be in place in case of spillages onto road surfaces and water courses; • No stockpiling should take place within a water course, wetland or buffers and all stockpiles must be protected from erosion, stored on flat areas where run-off will be minimised, and be surrounded by bunds;	
Monitoring		
The following monitoring is recommended:	• The revegetation of any temporary sites as well as any previously degraded areas must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications • Stormwater systems must be inspected on an annual basis to ensure these are functional. • Any concentrated runoff and or erosion where observed must be rectified with the appropriate stormwater management measures, e.g. gabions, reno mattresses or energy dissipators	
Cumulative impacts		
Nature of cumulative impacts	Additional loss of sensitive vegetation / habitats related to other development within the region, most of which will result in additional clearing of wetland areas.	
Rating of cumulative impacts	**With Mitigation**	**With Mitigation**
	High -	Medium-

C – HERITAGE RESOURCES (Refer to Appendix D4 and E7)

Impact 7: Impact on Heritage Resources:

Issue	The proposed development has the potential to "change the character of the site" as the site is currently vacant and exceeds 5000m^2. This could have an impact on Heritage Resources.
Description of Impact	
According to the Heritage NID & Screener it is unlikely that the proposed development will impact on significant heritage resources and as such, it is recommended that a no further Heritage Studies are required for this development. The site is zoned Industrial	

and is found within an Industrial Area. ECPHRA agreed with the findings in their 'Final Comment' dated 27 November 2025 (Appendix E7).

Type of Impact	Direct	
Nature of Impact	Negative	
Phases	Construction	
Criteria	**Without Mitigation**	**With Mitigation**
Intensity	Low	Low
Duration	Short-term	Short-Term
Extent	Local	Local
Probability	Improbable	Improbable
Significance	Low -	Low -
Degree to which impact can be reversed	-	
Degree to which impact may cause irreplaceable loss of resources	no loss of resources	
Degree to which impact can be mitigated	Low -	
Mitigation actions		
The following measures are recommended:	Pre/ Construction Phase: • The project proponent/representative must notify ECPHRA of the date of commencement of the project or share the project schedule and Environmental Authorisation (EA). • It is recommended that the Chance Finds Procedure be adopted and implemented throughout the construction phase of the development. The developer must get specialists' input in order to submit a detailed, site specific heritage & paleontological chance finds procedure (CFP), before the start of the pre/construction phase, for ECPHRA's approval. The CFP must outline stop-work procedures, emergency protection measures, reporting protocols, contact details for ECPHRA and approved heritage specialists, guidance on recognising heritage materials and graves. The CFP must form part of the EMPr and be available on site at all times. • Heritage induction and training for all ground crew, must include identification of archaeological, palaeontological, historical, and burial-related material. This ensures lawful heritage compliance during all phases of the project. • Heritage monitoring • Should any archaeological resources or human remains be uncovered during the course of construction, work must cease and ECPHRA must be notified. Operational Phase: • Upon completion of the project, a final heritage compliance report is to be submitted to ECPHRA.	
Monitoring		
The following monitoring is recommended:	It is recommended that **Chance Finds Procedures** are adopted and implemented throughout the construction phase of the development.	
Cumulative impacts		
Nature of cumulative impacts	Impact on surrounding Heritage Resources.	
Rating of cumulative impacts	**With Mitigation**	**With Mitigation**
	Low -	Low -

D – SOCIO-ECONOMIC RESOURCES

Impact 8: Nuisance Impacts associated with the Construction Phase (e.g. Noise & Dust)

Issue	During the construction phase of the development several nuisance impacts could be prevalent (e.g. Noise & Dust).	
Description of Impact		
During the construction phase of the development several nuisance impacts could be prevalent (e.g. Noise & Dust).		
Type of Impact	Direct	
Nature of Impact	Negative	
Phases	Construction	
Criteria	**Without Mitigation**	**With Mitigation**
Intensity	Medium	Low
Duration	Short-term	Short-Term
Extent	Local	Local
Probability	Probable	Probable
Significance	Medium -	Low -
Degree to which impact can be reversed	Partly reversible	
Degree to which impact may cause irreplaceable loss of resources	no loss of resources	
Degree to which impact can be mitigated	Low -	
Mitigation actions		
The following measures are recommended:	The Environmental Management Programme (Appendix F) be approved and implemented which addresses all construction and operational related impacts.	
Monitoring		
The following monitoring is recommended:	An Environmental Control Officer (ECO) must be appointed to monitor compliance and implementation of the approved EMPr.	
Cumulative impacts		
Nature of cumulative impacts	Cumulative dust and noise impacts associated with additional construction activities taking place at the same time within the vicinity of the site.	
Rating of cumulative impacts	**With Mitigation**	**With Mitigation**
	Medium -	Low -

Impact 9: Positive Socio-Economic impacts associated with the Construction & Operational Phase (e.g. job creation and stimulating the local economy)

Issue	Positive socio-economic impacts associated with the Construction & Operational Phase (e.g. job creation and stimulating the local economy).
Description of Impact	
According to the NMBM IDP (2021), Nelson Mandela Bay Municipality continues to suffer the consequences of the most persistent drought in its history coupled with the impacts of the COVID-19 pandemic which began in early 2020. The impacts are exacerbated by the fact that the City has high levels of poverty, joblessness, homelessness, and a declining fiscus caused inter alia by decreased grant funding from National Treasury as well as a weakened national and local economy. Job creation and restoring the economy has been identified as a key priority. Emphasis is placed on economic turnaround through inter alia, the creation of an enabling environment for private sector investments to create jobs. The expected capital value of the activity on completion is estimated at around R1 Billion and a further R7.5 million is estimated to be generated by the proposed development on an annual basis. Furthermore, the expected value of employment opportunities during the development phase is estimated at around R220 million. These figures will assist the municipality and society by stimulating the local economy and providing job opportunities within the Gqeberha. Spatial targeting and the elimination of spatial inequalities, as envisaged in the National Development Plan, is an underlying principle of the Urban Network approach, hence the focus of the IDP on the catalytic development of under-serviced city areas. The Urban	

Network Strategy identifies a number of network elements (CBD, hubs, growth areas) and allows for the identification of Integration Zones that link CBDs and hubs in which catalytic development is encouraged. Wells Estate, amongst other areas, has been identified as a growth area (secondary urban hub). The proposed development will have a positive local and regional economic impact, benefiting society in general.

Beyond the sizable investment into the Gqebeha economy, the project will create employment opportunities during construction and operational phase of the project with approximately 685 jobs being created over the lifespan of the project (temporary and permanent).

Type of Impact	Direct	
Nature of Impact	Positive	
Phases	Construction & Operational	
Criteria	**Without Mitigation**	**With Mitigation**
Intensity	Low	
Duration	Long-term	
Extent	Local	
Probability	Improbable	
Significance	High +	
Degree to which impact can be reversed	-	
Degree to which impact may cause irreplaceable loss of resources	no loss of resources	
Degree to which impact can be mitigated	-	
Mitigation actions		
The following measures are recommended:	No mitigation measures are required as Job creation and stimulating the local economy are considered Positive Impacts.	
Monitoring		
The following monitoring is recommended:	No mitigation measures are required as Job creation and stimulating the local economy are considered Positive Impacts.	
Cumulative impacts		
Nature of cumulative impacts	Impact on surrounding Heritage Resources.	
Rating of cumulative impacts	**With Mitigation**	**With Mitigation**
	Medium +	-

2. REJECTED ALTERNATIVE (Alternative 2 – Appendix C2)

All the impacts associated within the Preferred Alternative would also apply to this Alternative. These impacts have been summarised below. It is only "Impact 1: Loss of vegetation and in particular species / habitats that are listed as Vulnerable" that would have a higher impact rating as this Alternative DOES NOT avoid the area of intact Grassridge Bontveld as indicated in the Preferred Alternative. It is for this reason that this Alternative has been rejected.

A – TERRESTRIAL IMPACTS (Refer to Appendix D1)

Impact 1: Loss of vegetation and in particular species / habitats that are listed as Vulnerable

Impact 2: Loss and/or Fragmentation of Faunal Habitat

Impact 3: The potential spread of alien vegetation

B – AQUATIC IMPACTS (Refer to Appendix D1)

The proposed development has avoided all aquatic systems.

Impact 4: Loss of wetland habitat and any functional corridors:

Impact 5: Changes to the hydrological regime and increased potential for erosion:

Impact 6: Changes to water quality:

C – HERITAGE RESOURCES (Refer to Appendix D4 and Appendix E7)
Impact 7: Impact on Heritage Resources:

D – SOCIO-ECONOMIC RESOURCES
Impact 8: Nuisance Impacts associated with the Construction Phase (e.g. Noise & Dust)
Impact 9: Positive Socio-Economic impacts associated with the Construction & Operational Phase (e.g. job creation and stimulating the local economy)

3. NO-GO ALTERNATIVE

With regard to the No-Go Alternative it is assumed that the site would continue to degrade due to the prevalence of alien encroachment, bush clearing and grazing. According to the Ecology Specialist "*this would continue into the long-term with a High intensity that would impact on the regional scale due to loss of important habitat. Little in the way of mitigation could be proposed due to the social needs of the surrounding residents and their requirement for grazing areas*."

Although no noise or dust socio-economic impacts would be experienced by the direct 'neigbours' the positive socio-economic opportunities in terms of job creation and the stimulation of the local economy also falls away for the no-go alternative. The positive socio-economic opportunities far out way the negative socio-economic activities. Furthermore, the site will continue to be used as a dumping zone with the aesthetic appeal of the area becoming more degraded over time.

Considering the Aquatic, Faunal and Botanical specialist stated that "*with the mitigations, the overall significances of the impacts were rated as VERY LOW to LOW" and he therefore has no objection to the project approval, the no-go alternative is not considered the best practicable environmental option in this instance.*

3. CLIMATE CHANGE ASSESSMENT

Climate change issues must be considered as part of the EIA process Please consider the Climate Change guideline. EAP must determine:
a)The potential impact of climate change on society and the economy, whether the impact is negative or positive, considering that society needs to be at the centre of the proposed development;
b)The potential alternatives of the proposed development, alternatives that will have less impact on climate change (environment and generation of waste included), the society and economy;
c)whether, and to what extent, the proposed development will result in the release of greenhouse gas (GHG) emissions;
d)whether the proposed development is necessary to achieve long term decarbonisation goals;
e)the impact of the development on social, economic, natural and built environment that are crucial for climate change, adaptation and resilience;
f) the projected impact of climate change on proposed development; and surrounding environment, and implications for the development.
g)Explanation of how the impacts is likely to be exacerbated or minimised as result of climate change and what measures are likely to be implemented to accommodate and manage (adapt to) the anticipated worst scenario where applicable
h) whether, and to what extent, the impacts identified in (a) -(g) can be mitigated.

According to the United Nations Framework Convention on Climate Change, Climate Change is defined as a change of climate which is attributed directly or indirectly to human activity that alters the composition of the global atmosphere, and which is in addition to natural climate variability over comparable time periods. The specific mechanism which drives climate change is the increase in the greenhouse gas carbon dioxide in the atmosphere, which leads to increased atmospheric heat, which in turn drives the phenomenon of global warming. Global warming then interrupts natural climatic patterns and is experienced differently in various parts of the world, but it is the most vulnerable communities that are hardest-hit by the effects of human-induced climate change.

The NMBM MSDF states that "South Africa experiences climate change in a unique way, due to the natural dry climate and the legacy of inequal spatial design. It is expected that there will be an increase in temperature levels within the Eastern Cape Province, as well as rise in sea levels in coastline areas. Implications of climate change indicate the province could expect more increased rainfall in its' eastern portion. This will result in flooding and higher flows into the river systems and rising sea levels along with higher-intensity storm surges will be likely to impact on lower altitude portions of NMBM. Combined with the highest-rated risk of floods (2010 Disaster Risk Assessment for the Nelson Mandela Bay Municipality), this climate risk requires drastic attention in terms of ecological service provision & safe human settlements planning."

"Climate change will not only impact the environment, but it is also expected to have an impact on the performance of the economy, social behaviour, infrastructure and other aspects of human existence within the municipality."

The NMBM SDF situation assessment report specifically identifies climate change risks that are relevant to spatial planning including: Heatwaves, droughts and water availability, increased rainfall flooding, Sea level Rise and Storm Surges, Fire risk, Rise in temperatures and impacts on human health, and Food security.

Green infrastructure technology not only advances sustainability but also strengthens Nelson Mandela Bay Municipality's resilience to climate variability, extreme weather, and resource scarcity as recognised in the MSDF. By integrating climate adaptation into infrastructure planning, the municipality can:

- Enhance drought resilience through rainwater harvesting, greywater reuse, and water efficient practices.
- Mitigate urban flooding and erosion via stormwater management and vegetation buffers.
- Increase energy security with decentralised solar PV and agrivoltaics, reducing reliance on the national grid.
- Improve urban microclimates and biodiversity through green spaces, wetlands, and tree planting.

An Aquatic Assessment was undertaken, and the proposed development has avoided all aquatic systems. No wetlands, riparian areas or other aquatic environments exist on the site. The site is not found within any flood lines or areas vulnerable to flooding. Furthermore, the site is located almost 4km from the nearest coastline.

The Applicant will obtain EDGE Green Building Certification and Complies with the South African National Standards (SANS) 10400-XA (minimum requirements of the South African National Building Regulations on energy efficiency and environmental sustainability in building design). A solar PV system is a key step toward advancing renewable energy and long-term sustainability for this development. With substantial roof space available, the initiative aims to deliver up to 1 MVA of clean energy, reducing reliance on traditional power sources and improving energy resilience. The Applicant is committed to driving sustainability across its portfolio, and this project reflects that vision. Furthermore, stormwater management has been addressed in the Engineering Services Report (**Appendix D2**).

4. ENVIRONMENTAL IMPACT STATEMENT

Taking the assessment of potential impacts into account, please provide an environmental impact statement that summarises the impact that the proposed activity and its alternatives may have on the environment after the management and mitigation of impacts have been taken into account, with specific reference to types of impact, duration of impacts, likelihood of potential impacts actually occurring and the significance of impacts.

PHS Consulting has been appointed by Retail Logistics Fund (Pty) Ltd to undertake the application for Environmental Authorisation (Basic Assessment) for the proposed construction of a new Industrial Park (warehousing and offices) situated on Erf 10301, Wells Estate, Gqeberha, Eastern Cape Province. The property is bounded by the R102 (the Old Grahamstown Road) to the east and M Kaulela Street to the north with the R367 located to the west and Tynira Street to the south [**Appendix A: Locality Map**]. Erf 10301 is owned by Retail Logistics Fund (Pty) Ltd and is ±166 451 m^2 in extent. The site is zoned Industrial Zone 1.

Alternatives and the Activities:

Preferred Alternative:
The primary land-use of the development will be warehousing with ancillary offices. Six zones within the property will be established made up of a combination of warehousing/ offices and these will be surrounded by roads, parking, service infrastructure, and open spaces. The total development footprint to be cleared is ± 161 101 m^2.

Access to the site will be from M Kaulela Street. The internal distribution road will be 11m wide from kerb to kerb consisting of two 4m wide lanes and two 1.5m wide yellow shoulders, with paved walkways on both sides. The main entrance off M Kaulela Street will be four lanes through a security checkpoint. The guardhouse will be set back from the street to allow for stacking of trucks.

Stormwater run-off will be concentrated to low points in the parking areas and marshalling yards, from where the minor portion of runoff will be conveyed via a conventional underground system. The internal roads, marshalling yards, parking areas and channels will act as overland flow routes for major storm events. A new stormwater connection from the existing stormwater canal to the south of the property (crossing the R102 to the site) will be constructed. The pipe route is across municipal land, and it is recommended that the culvert be laid within an 8m wide servitude along the south-western boundary of Erf 8741.

Two stormwater attenuation facilities/dams will be constructed on the southwestern and south-eastern boundaries, respectively. The attenuation dams will act as dry detention basins, with a combined extended storage available to effectively attenuate up to a 1: 50-year post development flood, to 1:5-year pre-development flood levels. These facilities will effectively manage and convey stormwater run-off of up to 1:100-year rainfall events to minimize the risk of flooding of internal and downstream properties. A minimum combined storage volume of 2038m3 is required. The attenuation dam outlets will be connected to the existing stormwater channel to the south-east of the site, via the new proposed culvert.

Due to the flatness of the area, each of the six zones will have its own sewer collection sump and pump station lifting the sewer and discharging into the existing main sewer pump station. The internal sewer network for the individual sites will consist of a 160mm diameter uPVC Class 34 pipe network and round precast fibre cement manholes.

The proposed internal water reticulation network will consist of a 160mm diameter metered connection splitting into two separate lines: a 160mm diameter uPVC Class 16 for fire and a 110mm diameter uPVC Class 12 for potable water."

A 25kVA supply has been allocated to the site by the Nelson Mandela Bay Municipality (NMBM). The proposed Industrial Park is anticipated to have a load requirement of approximately 2.5 MVA. Incorporating a solar PV system is a key step toward advancing renewable energy and long-term sustainability for this development. With substantial roof space available, the initiative aims to deliver up to 1 MVA of clean energy, reducing reliance on traditional power sources and improving energy resilience.

Please refer to **Appendix C1** for the proposed **Site Development Plan**.

Alternative 2: Rejected Alternative
The primary land-use of the development will be warehousing with ancillary offices. Six zones within the property will be established made up of a combination of warehousing/ offices and these will be surrounded by roads, parking, service infrastructure, and open spaces. The total development footprint to be cleared is ± 166 451 m^2. Access to the site will be from M Kaulela Street. The internal distribution road will be 11m wide from kerb to kerb consisting of two 4m wide lanes and two 1.5m wide yellow shoulders, with paved walkways on both sides. The main entrance off M Kaulela Street will be four lanes through a security checkpoint. The guardhouse will be set back from the street to allow for stacking of trucks.

Stormwater, electricity, sewer and water reticulation will be identical to Alternative 1. However, this alternative does not avoid the intact patch of Grassridge Bontveld (Figure 77 below).

Please refer to **Appendix C2** for the proposed **Site Development Plan**.

No- Go Alternative:
With regard to the No-Go Alternative it is assumed that the site would continue to degrade due to the prevalence of alien encroachment, bush clearing and grazing. According to the Ecology Specialist "*this would continue into the long-term with a High intensity that would impact on the regional scale due to loss of important habitat. Little in the way of mitigation could be proposed due to the social needs of the surrounding residents and their requirement for grazing areas*."

Although no noise or dust socio-economic impacts would be experienced by the direct 'neigbours' the positive socio-economic opportunities in terms of job creation and the stimulation of the local economy also falls away for the no-go alternative. The positive socio-economic opportunities far out way the negative socio-economic impacts. Furthermore, the site will continue to be used as a dumping zone with the aesthetic appeal of the area becoming more degraded over time.

Considering the Aquatic and Terrestrial Ecology Study stated that "*with the mitigations, the overall significances of the impacts were rated as VERY LOW to LOW*" and he therefore has no objection to the project approval, the no-go alternative is not considered the best practicable environmental option in this instance.

Key findings of the EIA:

It needs to be noted that the site is part of a developed industrial area with development rights, as such densification and development of the area is expected based on sustainability principles and weighing all three impact pillars namely social, economic and the environment. The project relates to a R1 Billion investment into the area providing much needed positive socio-economic stimulation within the local municipality and beyond. Based on the advantages and disadvantages of the development layout alternatives in terms of the environmental context, the preferred layout will result in less severe environmental impacts due the exclusion of the no-go area from the development footprint.

Description of the affected environment:

Vegetation:

Grassridge Bontveld vegetation, restricted to the karst landscape created in the underlying limestone, consists of scattered, low bushclumps of Thicket species, in a matrix of open grassland which contains species characteristic of Fynbos, Grassland and Succulent Karoo vegetation types. Bushclumps are dominated by *Aloe africana*, *Chrysanthemoides monilifera, Colpoon compressum*, *Euclea undulata*, *Pterocelastrus tricuspidatus* and *Sideroxylon inerme*. The grassy matrix in Grassridge Bontveld is dominated by *Cynodon dactylon*, *Eustachys paspaloides*, *Themeda triandra*, *Ficinia truncata*, *Acmadenia obtusata*, *Disparago ericoides*, *Euryops ericifolius*, *Gazania krebsiana*, *Gibbaria scabra*, *Jamesbrittenia microphylla*, *Lobostemon trigonus*, *Monsonia emarginata*, *Nylandtia spinosa*, *Osteospermum imbricatum* and *Pteronia incana*. These grassy / fynbos areas also included high number of the small Euphorbia species (*E. globosa, & E.* obesa), *Pachypodium bispinosum* and *P. succulentum* and *Fockea gracilis* plants all of which are protected.

The proposed site is located within this vegetation type and thus all of these species listed above were observed with small, isolated areas, with only one small clump (thicket / grassland mosaic) remaining (4% of the site). The remainder of the site (96%), is heavily grazed by goats and cattle, used for illegal dumping of covered by alien *Acacia cyclops, Acacia longifolia, Acacia saligna, Lantana camara and Opuntia ficus-indica.*

From a conservation perspective the vegetation type/habitat listed in the NMBM Bioregional Plan is considered 'Vulnerable'. It should be noted that this bioregional plan was promulgated under the National Environmental Management: Biodiversity Act (10/2004): Publishing of the Final Bioregional Plan for the NMBM, March 2014 GN No. 3362. On 18 November 2022 a revised list of threatened ecosystems in need of protection was published in terms of the National Environmental Management, Biodiversity Act (NEMBA), (Act No 10 of 2004) (based on vegetation types in the Vegmap, 2006, as amended). Should a vegetation type or ecosystem be listed, actions in terms of NEM:BA are triggered. None of those ecosystems observed within the study area are listed in terms of this Act, i.e. the remaining extent of the observed Grassridge Bontveld is listed as Least Concern. Refer to Figure 7 showing the 'no-go' area and the remaining area.

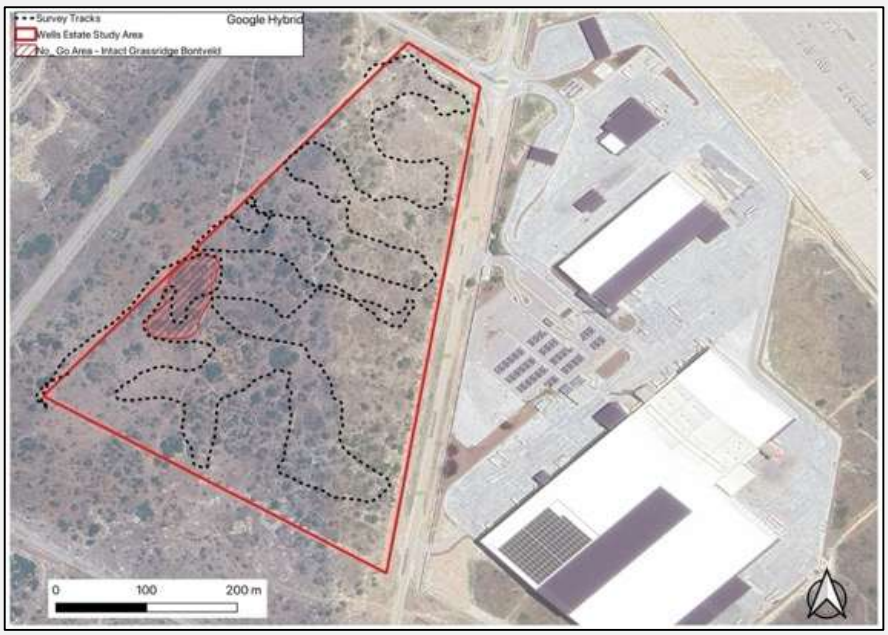

Figure 7: The results of the ecological sensitivity assessment, with the No-Go area shown (red hatched area). Note this is an older image for the site, and areas that were similar to this Bontveld area have been cleared.

Several important plant species are known to occur within the region as these are listed by SANBI under the Threatened Species Programme using the International Union for Conservation of Nature or IUCN (Red data list) criteria. These are shown in Table 1 below and any such plant Species of Special Concern were actively searched for during the survey. The highest density of the listed species are always found within the Grassridge Bontveld areas, and in particular along the edges of the bush clumps.

Several plant species are also listed in the Provincial Nature Conservation Ordinance (PNCO) of 1974, the National Forest Act (Act No. 84 of 1998). These species of special concern will require permits from the relevant provincial departments if any individuals are to be removed, translocated or trimmed according to the relevant legislation including the National Forestry Act (No. 84 of 1998) (Department of Forestry, Fisheries and the Environment) and the Provincial Nature Conservation Ordinance (Eastern Cape Department of Economic Development, Environmental Affairs and Tourism – Permit Administration) (refer to Table 1 in **Appendix D1**).

<u>Aquatic:</u>

No rivers or connected watercourses are anticipated within the study area, i.e. no concentrated surface flows are linked directly to any mainstem rivers within the greater region. Thus, the site is dominated by a coastal bench / plateaus which is underlain by calcrete formations of the Algoa Group (Alexandria Formation), within the M30B quaternary catchment of the Coega River. Two canals are located between 200 and 500m from the site, and these drain the Motherwell area of stormwater into the Swartkops Estuary.

The proposed site is not located within any Wetland Cluster as shown in the NSBA (2018) spatial information. These are areas with a high density of wetlands such as Valley Bottom systems. The proposed site is located within the Coega Table Mountain Sandstone Groundwater Strategic Water Resource Area. A Strategic Water Source Area (SWSA) is one where the water that is supplied is of national importance for water security. Surface water SWSAs are found in areas with high rainfall and produce most of the runoff. Groundwater SWSAs have high groundwater recharge and are located where the groundwater forms a nationally important resource. There are 22 national-level SWSAs for surface water (SWSA-sw) and 37 for groundwater (SWSA-gw). The SWSA-gw cover 9% of the area of South Africa, account for 15% of the recharge, 46% of the groundwater used by agriculture and 47% of the groundwater used by industry.

Furthermore, one wetland was indicated within 500m of the proposed site, namely an Endorheic Pan / Depression. Refer to Table 3 of Appendix D1 showing a "Summary table of the wetland classification and Present Ecological State and Ecological Importance and Sensitivity Scores". The wetland is not located on the site – refer to Figure 8 below.

Figure 8: Wetlands delineated in this study area within 500m of proposed project footprint.

Fauna:

Table 4 (**Appendix D1**) lists the relevant faunal groups, their likelihood of occurring within the study area, together with their associated habitat and conservation status. The majority of species listed as well as observed with a conservation status were found in association with the rocky outcrops or the Bontveld areas. Most of the species that are likely to occur were observed during the Search and Rescue programme during the construction of the adjacent Checkers Distribution Centre (DC) site. Although the DC site was less degraded than the study area, with more available habitat, species may still occur.

The majority of these species were listed by the PNCO, while the species listed by the DFFE Screening Tool were all rated as of Medium Sensitivity. DFFE also listed several bird species however these are all birds of prey and will move from the site should they occur.

The results indicated that several important habitats are located within the proposed development site and for the most part, the areas rated with the highest sensitivity have been avoided within the preferred layout. The project has thus made use of as many previously disturbed / developed areas as possible. Therefore, with the mitigations, the overall significances of the impacts were rated as VERY LOW to LOW and the ecological specialist has no objection to the project approval. This is based on the assumption that any protected or listed species that still remain will be relocated to the proposed open space area.

Heritage:

Jenna Lavin undertook a Heritage NID and Screener (Appendix D4) which has been submitted to ECPHRA:

Based on the extensively disturbed nature of the area proposed for development, it is very unlikely that the proposed development will impact on significant, in situ archaeological resources. In addition, there are clearly no structures of any kind located within the proposed development area which may have heritage significance. As such, it is recommended that no further archaeological assessments are required. However, should any archaeological resources or human remains be uncovered during the course of construction, work must cease and ECPHRA must be notified. It is also very unlikely that significant palaeontological resources will be impacted by the proposed development. However, it is recommended that Chance Finds Procedure be adopted and implemented throughout the construction phase of the development.

ECPHRA agreed with the findings in their 'Final Comment' dated 27 November 2025 (**Appendix E7**).

Overall Findings:
Erf 409 (parent erf) was registered in 1965 for industrial use and has been developed/utilised for industrial purposes with an Industrial Zoning that involved continued industrial expansion on the property since 1965. In 2011 Erf 409 was subdivided (Erven 8741; 8740 and 8739) and Erven maintained the Industrial Zoning from the mother Erf. Erf 8741 was again subdivided in 2023 to create Erf 10301(a portion of Erf 8741) but maintains its Industrial Zoning. Permitted uses in terms of this zoning includes warehousing, storage, workshops and offices. Erf 10301 forms part of the built-up area as such it is regarded as inside the urban area as per NEMA definition. Furthermore, the earliest development evident, according to available historic aerial photography, is before 1971 with the establishment of the GM SA facility (now located on Erf 8740 and 8739) which has expanded over the years and now covers the entire extent of these Erven. The existing Shoprite Checkers DC facility located on Erf 8741(to the east of the site) was constructed in 2012 and has recently been expanded (2024).

The proposed development will result in substantial financial investment within the area and will provide numerous employment opportunities which are required in this region. Beyond the sizable investment into the Gqebeha economy which is estimated at approximately R7.5 million annually, the project will create employment opportunities during construction and operational phase of the project with approximately 685 jobs being created over the lifespan of the project (temporary and permanent).

The proposed development will not contradict or conflict with the municipal IDP and SDF as the proposed site occurs within an industrial area and will be utilized for such purposes. There is a definite need for the proposed activity given the magnitude of the development and positive economic impacts for the Nelson Mandela Bay Metro as a whole (financial investment into the economy and employment opportunities). The site is zoned Industrial 1 and will be utilized for such purposes. The site is located within an urban area with available bulk service infrastructure.

Gqeberha has high levels of poverty, joblessness, homelessness, and a declining fiscus. Job creation and restoring the economy has been identified as a key priority within various planning policies. Emphasis is placed on economic turnaround through inter alia, the creation of an enabling environment for private sector investments to create jobs. The expected capital value of the activity on completion is estimated at around R1 Billion and a further R7.5 million is estimated to be generated by the proposed development on an annual basis. Furthermore, the expected value of employment opportunities during the development phase is estimated at around R220 million. These figures will assist the municipality and society by stimulating the local economy and providing job opportunities within the Gqeberha.

According to the results indicated in the Aquatic & Terrestrial Ecology Impact Assessment (EnviroSci) several important habitats are located within the proposed development site and for the most part, the areas rated with the highest sensitivity have been avoided within the preferred layout. The project has thus made use of as many previously disturbed / developed areas as possible. Therefore, with the mitigations, the overall significances of the impacts were rated as Very Low to Low and the ecological specialist has no objection to the project approval. This is based on the assumption that any protected or listed species that still remain will be relocated to the proposed open space area. All recommended mitigation measures have been included in the EMPr.

Summary of Impacts and Significance (after mitigation):

TERRESTRIAL (Refer to Appendix D1)
Impact 1: Loss of vegetation and in particular species / habitats that are listed as Vulnerable – LOW (-)
Impact 2: Loss and/or Fragmentation of Faunal Habitat - LOW (-)

Impact 3: The potential spread of alien vegetation – LOW (-)

AQUATIC (Refer to Appendix D1) - The proposed development has avoided all aquatic systems.
Impact 4: Loss of wetland habitat and any functional corridors – VERY LOW (-)
Impact 5: Changes to the hydrological regime and increased potential for erosion - VERY LOW (-)
Impact 6: Changes to water quality - VERY LOW (-)

HERITAGE RESOURCES (Refer to Appendix D4)
Impact 7: Impact on Heritage Resources - LOW (-)

SOCIO-ECONOMIC
Impact 8: Nuisance Impacts associated with the Construction Phase (e.g. Noise & Dust) – LOW (-)
Impact 9: Positive Socio-Economic impacts associated with the Construction & Operational Phase (e.g. job creation and stimulating the local economy) – HIGH (+)

Mitigation, Management and Monitoring Measures proposed:

Pre/ Construction Phase:

- The project proponent/representative must notify ECPHRA of the date of commencement of the project or share the project schedule and Environmental Authorisation (EA).
- It is recommended that the Chance Finds Procedure be adopted and implemented throughout the construction phase of the development. The developer must get specialists' input in order to submit a detailed, site specific heritage & paleontological chance finds procedure (CFP), before the start of the pre/construction phase, for ECPHRA's approval. The CFP must outline stop-work procedures, emergency protection measures, reporting protocols, contact details for ECPHRA and approved heritage specialists, guidance on recognising heritage materials and graves. The CFP must form part of the EMPr and be available on site at all times.
- Heritage induction and training for all ground crew, must include identification of archaeological, palaeontological, historical, and burial-related material. This ensures lawful heritage compliance during all phases of the project.
- Heritage monitoring during the construction phase
- Should any archaeological resources or human remains be uncovered during the course of construction, work must cease and ECPHRA must be notified.
- All temporary works areas (laydowns and camps), where possible, must be placed in previously disturbed areas within the site, including any temporary access roads or storage areas, e.g. in areas where alien vegetation is dense and could be cleared for this purpose.
- Any protected or listed species that are mentioned in the Terrestrial Ecologists Report must be relocated with the requisite permits in place.
- Comply with search and rescue specifications as per the permits issued.
- The revegetation of any temporary sites, as well as any previously degraded areas, must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications particularly the remaining open space areas.
- Alien vegetation management must be initiated at the beginning of the construction period.
- No stormwater discharged may be directed to delineated aquatic zone (Figure 8 above).
- A construction and operational stormwater management plan must be developed post EA, detailing the structures and actions that must be installed to prevent the increase of surface water flows directly into any natural systems.
- Effective stormwater management must include measures to slow, spread and deplete the energy of concentrated flows thorough effective stabilisation (gabions and Reno mattresses) and the re-vegetation of any disturbed areas.

- All construction materials including fuels and oil should be stored in demarcated areas that are contained within berms / bunds to avoid spread of any contamination.
- Washing and cleaning of equipment should also be done in berms or bunds, in order to trap any cement and prevent excessive soil erosion. Mechanical plant and bowsers must not be refuelled or serviced within or directly adjacent to any channel. It is therefore suggested that all construction camps, lay down areas, batching plants or areas and any stores should be located further than a temporary 85 m from a watercourse and wetland. Chemicals used for construction must be stored safely on site and surrounded by bunds. Chemical storage containers must be regularly inspected so that any leaks are detected early.
- Develop and implement emergency plans in case of any spillages.
- Littering and contamination of water sources during construction must be prevented by effective construction camp management.
- Emergency plans must be in place in case of spillages onto road surfaces and water courses.
- No stockpiling should take place within a water course, wetland or buffers and all stockpiles must be protected from erosion, stored on flat areas where run-off will be minimised, and be surrounded by bunds.

Operational Phase:

- Upon completion of the project, a final heritage compliance report is to be submitted to ECPHRA.
- The revegetation of any temporary sites, as well as any previously degraded areas, must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications in particular the remaining open space areas.
- Alien vegetation management must be initiated at the beginning of the construction period and is ongoing.
- No stormwater discharged may be directed to delineated aquatic zone.
- A construction and operational stormwater management plan must be developed post EA, detailing the structures and actions that must be installed to prevent the increase of surface water flows directly into any natural systems.
- Effective stormwater management must include measures to slow, spread and deplete the energy of concentrated flows thorough effective stabilisation (gabions and Reno mattresses) and the re-vegetation of any disturbed areas.
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- Develop and implement emergency plans in case of any spillages.
- Emergency plans must be in place in case of spillages onto road surfaces and water courses.

Monitoring:

- Regeneration of alien vegetation must be monitored once all areas have been cleared, forming part of a long term alien vegetation management plan within any remaining open space areas.
- The revegetation of any temporary sites, as well as any previously degraded areas, must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications in particular the remaining open space areas.
- Alien vegetation management must be initiated at the beginning of the construction period.
- Any concentrated runoff and or erosion where observed must be rectified with the appropriate stormwater management measures, e.g. gabions, reno mattresses or energy dissipators, and not be discharged into any natural wetland features.
- Stormwater systems must be inspected on an annual basis to ensure these are functional.

The Environmental Management Programme (**Appendix F**) be approved and implemented (which addresses all the mitigation measures outlined in this report).

An Environmental Control Officer (ECO) must be appointed to monitor compliance and implementation of the approved EMPr, mitigation measures outlined in Section E above, and all Environmental Authorisation conditions.

Assumptions, uncertainties and gaps in knowledge:

The assumption is made that the information on which this report is based (impact assessments and project information) is accurate and correct.

According to the Aquatic and Terrestrial Ecologist: "*In order to obtain a comprehensive understanding of the dynamics of both the flora and fauna of both the terrestrial and aquatic communities within a study site, as well as the status of endemic, rare or threatened species in any area, assessments should always consider investigations at different time scales (across seasons/years) and through replication. Due to time constraints, these long-term studies are not always feasible and are mostly based on instantaneous sampling. However, EnviroSci has been involved in a number of projects related to the study area spanning the period 1996 to present, which also includes detailed search and rescue efforts for construction projects underway in the region, thus possess a detailed understanding of the species assemblages, habitat functions and Species of Special Concern habitat preferences in the region.*

It should be emphasised that information, as presented in this document, only has reference to the study area as indicated on the accompanying maps. Therefore, this information cannot be applied to any other areas without detailed investigation."

SECTION E. RECOMMENDATIONS OF PRACTITIONER

Is the information contained in this report and the documentation attached hereto sufficient to make a decision in respect of the activity applied for (in the view of the environmental assessment practitioner)?	YES
Is an EMPr attached?	YES

The EMPr must be attached as **Appendix F**.

If "NO", indicate the aspects that should be assessed further as part of a Scoping and EIA process before a decision can be made (list the aspects that require further assessment):

N/A

If "YES", please list any recommended conditions, including mitigation measures that should be considered for inclusion in any authorisation that may be granted by the competent authority in respect of the application:

Pre / Construction Phase:

- The project proponent/representative must notify ECPHRA of the date of commencement of the project or share the project schedule and Environmental Authorisation (EA).
- It is recommended that the Chance Finds Procedure be adopted and implemented throughout the construction phase of the development. The developer must get specialists' input in order to submit a detailed, site specific heritage & paleontological chance finds procedure (CFP), before the start of the pre/construction phase, for ECPHRA's approval. The CFP must outline stop-work procedures, emergency protection measures, reporting protocols, contact details for ECPHRA and approved heritage specialists, guidance on recognising heritage materials and graves. The CFP must form part of the EMPr and be available on site at all times.
- Heritage induction and training for all ground crew, must include identification of archaeological, palaeontological, historical, and burial-related material. This ensures lawful heritage compliance during all phases of the project.
- Heritage monitoring
- Should any archaeological resources or human remains be uncovered during the course of construction, work must cease and ECPHRA must be notified.
- All temporary works areas (laydowns and camps), where possible, must be placed in previously disturbed areas within the site, including any temporary access roads or storage areas, e.g. in areas where alien vegetation is dense and could be cleared for this purpose.
- Any protected or listed species that is mentioned in the Terrestrial Ecologists Report, must be relocated with the requisite permits in place.
- Comply with search and rescue specifications as per the issued permits.
- The revegetation of any temporary sites, as well as any previously degraded areas, must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications in particular the remaining open space areas.
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- All construction materials including fuels and oil should be stored in demarcated areas that are contained within berms / bunds to avoid spread of any contamination.
- Washing and cleaning of equipment should also be done in berms or bunds, in order to trap any cement and prevent excessive soil erosion. Mechanical plant and bowsers must not be refuelled or serviced within or directly adjacent

to any channel. It is therefore suggested that all construction camps, lay down areas, batching plants or areas and any stores should be located further than a temporary 85 m from a watercourse and wetland. Chemicals used for construction must be stored safely on site and surrounded by bunds. Chemical storage containers must be regularly inspected so that any leaks are detected early.

- Develop and implement emergency plans in case of any spillages.
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- Emergency plans must be in place in case of spillages onto road surfaces and water courses.
- No stockpiling should take place within a water course, wetland or buffers and all stockpiles must be protected from erosion, stored on flat areas where run-off will be minimised, and be surrounded by bunds.

Operational Phase:

- Upon completion of the project, a final heritage compliance report is to be submitted to ECPHRA.
- The revegetation of any temporary sites, as well as any previously degraded areas, must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications in particular the remaining open space areas.
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- Stormwater systems must be inspected on an annual basis to ensure these are functional.

The Environmental Management Programme (**Appendix F**) be approved and implemented (which addresses all the mitigation measures outlined in this report).

An Environmental Control Officer (ECO) must be appointed to monitor compliance and implementation of the approved EMPr, mitigation measures outlined in Section E above, and all Environmental Authorisation conditions.

SECTION F: APPENDICES

The following appendixes must be attached as appropriate:

Appendix A: Locality Plans

Appendix B: Photographs

Appendix C: Site Development Plan & Environmental Sensitivity Map

Appendix D: Specialist reports

- **Appendix D1: Aquatic & Terrestrial Ecology Impact Assessment**
- **Appendix D2: Services Report**
- **Appendix D3: Electrical Report**
- **Appendix D4: Heritage NID & Screener**

Appendix E: Public Participation Information

- **Appendix E1: Newspaper Advert** – to be submitted with the final BAR
- **Appendix E2: Site Notice** – to be submitted with the final BAR
- **Appendix E3: Written Notice** – to be submitted with the final BAR
- **Appendix E4: I&AP Notification** – to be submitted with the final BAR
- **Appendix E5: I&AP List** (POPIA Version)
- **Appendix E6: Comments and Responses Report** – to be included after PPP has been undertaken.
- **Appendix E7: ECPHRA Final Comment**

Appendix F: Environmental Management Programme (EMPr)

Appendix G: Other information

- **Appendix G1: Service Capacity Letters (Municipal)** – *to be submitted with the final BAR*
- **Appendix G2: Declarations**
- **Appendix G3: Impact Assessment Methodology**
- **Appendix G4: Site Sensitivity Verification Report**
- **Appendix G5: DEA Screening Tool Report**