Western Cape Government

Department of Environmental Affairs and Development Planning

NEMA S24G ENVIRONMENTAL ASSESSMENT REPORT

SECTION 24G APPLICATION FOR THE DENSIFICATION OF THE APPROVED RESIDENTIAL DEVELOPMENT ON ERF 3733, MANDALAY

Section 24G Assessment Report for the consequences of unlawful commencement of activities in terms of the:

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

MARCH 2026

Form Number S24G-AR/03/2026

General Description of Development (This must Include an overview of the project including the Farm name/Portion/Erf number)
SECTION 24G APPLICATION FOR THE DENSIFICATION OF THE APPROVED SOCIAL HOUSING DEVELOPMENT ON ERF 3733, MANDALAY. This Section 24G application is submitted in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) to obtain retrospective Environmental Authorisation for the densification of the approved housing development on Erf 3733, Mandalay, in accordance with the City of Cape Town-approved Site Development Plan (Appendix B1). The proposed development comprises a social housing project, as contemplated in the Social Housing Act, 2008 (Act 16 of 2008), and entails an increase in residential density from approximately 521 apartment units, as authorised in terms of NEMA through the Environmental Authorisation issued in 2011 (and amended in 2021), to 770 apartment units. The proposed development also includes associated engineering infrastructure, a neighbourhood retail component, and a crèche. The proposed social housing development is supported by the City of Cape Town, the Western Cape Department of Infrastructure and the Social Housing Regulatory Authority (SHRA). Implementation of the proposed densified social housing development was initiated by means of the unauthorised piping of portions of Wetland 7 beyond the extent authorised under the existing Environmental Authorisation, which enabled the revised development footprint. Accordingly, retrospective Environmental Authorisation is sought through this Section 24G application for the proposed densified layout as per Appendix B1.

DEPARTMENTAL REFERENCE NUMBER(S)

System ID Reference number (logged by Online system)	
s24G Application Reference (assigned by DEA&DP)	

DEPARTMENTAL REFERENCE NUMBER(S)

File Reference number (Enforcement), if applicable	
File reference number (EIA), if applicable:	
File reference number (Waste), if applicable:	
File reference number (Other (specify)):	

IMPORTANT INFORMATION TO BE READ PRIOR TO COMPLETING THIS SECTION 24G ASSESSMENT REPORT

1. This s24G Assessment Report must be submitted where a person has commenced with a listed or specified activity without an environmental authorisation in contravention of section 24F(1) of NEMA (i.e. where the person commenced with an activity listed or specified in terms of section 24(2) (a) or (b) of NEMA - the activities contained in the EIA Listing Notices) or has commenced, undertaken or conducted a waste management activity without a waste management licence in terms of section 20 (b) of the NEM:WA.

2. An **Independent and Registered Environmental Assessment Practitioner ("EAP")** must be appointed to complete the required sections of the Assessment Report on behalf of the applicant; the declaration of independence must be completed by the independent EAP and submitted with the Online Application Form.

3. If a specialist report is required, the specialist will also be required to complete the declaration of independence. **Copies of the EAPs and Specialists Registration Certificates be submitted with the online application.**

4. This report is current as of March 2026. It is the responsibility of the Applicant/EAP to ascertain whether subsequent versions of the report have been published or produced by the competent authority.

5. **This s24G Assessment Report serves as the supporting information for the online application and contains Sections D – I of the section 24G application. This report is for manual completion by the appointed EAP.**

6. **The Online Application can be accessed at …**

7. **The contents of this s24G Assessment Report include the following:**

   PART 1 -
   Section D: Need and Desirability
   Section E: Alternatives
   Section F: Impact Assessment, Management, Mitigation and Monitoring Measures
   Section G: Assessment Methodologies and Criteria, Gaps in Knowledge, underlying Assumptions and Uncertainties
   Section H: Recommendations of the EAP
   Section I: Representations - Response to an Incident or Emergency Situation (if applicable)

8. The required information must be typed within the spaces provided. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.

9. The Department may require that a hard copy of the reports also be submitted to the Department by a certain date but will advise you accordingly.

10. The space provided extend as each space is filled with typing. **A legible font type and size must be used when completing the form.** A digital copy of the s24G Assessment Report is available on the Department's website http://www.westerncape.gov.za/eadp

11. The use of "not applicable" in the s24G Assessment Report must be done with circumspection.

12. Unless protected by law, all information contained herein and attached to the s24G application will become public information for the purpose of the s24G application administrative process.

CIRCULARS, GUIDELINES AND TOOLS:

1. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations and guidelines must be taken into account when completing this Assessment Report.

2. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link https://screening.environment.gov.za/screeningtool to generate the Screening Report. The Screening Report must be attached to the Application as an Appendix.

DISCLAIMER

With regards to the Protection of Personal Information Act, 2013 (Act 4 of 2013) (POPIA), please note that all personal information is being voluntarily submitted for the purposes of your participation in this environmental application process. The information will be held by EAP on behalf of the Applicant and will be submitted to the Competent Authority for the decision on the application. Personal information may also be made available to the Appellant/s so that they may participate in the appeal process in the event that the decision on the application is appealed. Personal information may also be made available to third-party auditors so that you can be notified of future audits of the environmental decision.

PART 1 - CONTINUED FROM ONLINE SYSTEM

PROJECT TITLE WITH DETAILED DESCRIPTION OF THE DEVELOPMENT INCLUDING GENERIC DESCRIPTION OF LISTED /WASTE MANAGEMENT ACTIVITIES BEING APPLIED FOR.

SECTION 24G APPLICATION FOR THE DENSIFICATION OF THE APPROVED RESIDENTIAL DEVELOPMENT ON ERF 3733, MANDALAY.

This Section 24G application is submitted in terms of the National Environmental Management Act (NEMA, Act 107 of 1998) to obtain retrospective Environmental Authorisation for development activities undertaken and proposed on Erf 3733, Mandalay as per CoCT approved SDP attached under Appendix B1.

Erf 3733, Mandalay is located within the City of Cape Town Metropolitan Municipality, approximately 5 km south-southeast of Cape Town International Airport and approximately 580 m east of Mitchells Plain District Hospital. The property was previously comprised of Erven 3303 and 3304, which were subdivided from Erf 776 before subsequently being consolidated into a single property (Figure 1). The site is situated within an established urban environment characterised predominantly by residential developments, schools, healthcare facilities and associated municipal infrastructure. Mandalay Railway Station and the associated railway line are located immediately north of the site.



Figure 1: Locality map of Erf 3373, Mandalay and Original Erf 776, Mandalay

On 28 October 2011, DEA&DP granted Environmental Authorisation to Communicare (Pty) Ltd, the then owner of Erf 776, Mandalay, for the development of a mixed-use development and associated infrastructure on Erf 776, Mandalay. As part of the Environmental Impact Assessment process at the time, a Freshwater Ecological Assessment (Belcher, 2008) identified and delineated several wetlands on the property (Figure 2). The approved development layout authorised the infilling of the majority of the identified wetlands while retaining Wetland 3 and portions of Wetland 7. Despite uncertainty within the 2011 EA, an external audit (Appendix J2) concluded that according to the approved

layout, sections of Wetland 7 located within designated open space were to remain as open channels, whereas portions falling within the approved development footprint were authorised to be infilled (Figure 3).



Figure 2: Mapped Wetland Features (Belcher, 2010)



Figure 3: Wetland 7 during the initial site clearance in 2013 (External Audit undertaken by Infinity Environmental, December 2025). Portions of the wetland within areas designated as open space were to remain un-piped.

Implementation of the authorised 2011 development commenced shortly after the initial Environmental Authorisation was issued; however, not all components of the approved development were fully implemented at the time. Since the Environmental Authorisation was granted, the demand for affordable housing within the area has increased, giving rise

to the need for a higher-density residential development. In response, a revised development layout was proposed to increase the residential density and development activities on site commenced accordingly.

On 7 April 2022, the original Environmental Authorisation was amended to split the authorised development into three separate amended Environmental Authorisations following the subdivision of Erf 776. This amendment primarily served to apportion the development rights authorised under the 2011 Environmental Authorisation between the newly created properties and to facilitate the separate implementation of the development by the respective landowners. Accordingly, Erf 3733 is currently subject to Environmental Authorisation Ref. No. 16/3/3/5/A4/41/3009/22 (A), which allocates development rights for two apartment blocks (corresponding to erven 3303 and 3304) comprising approximately 521 residential units, together with associated internal roads and infrastructure.

Historical aerial imagery indicates that vegetation clearing on Erf 776 had commenced by 2013 and that by 2017, the majority of Wetland 7 had been piped, roads were constructed, and services and walls were completed. The piping of Wetland 7 was undertaken at the instruction of the City of Cape Town to align the drainage system with the City's Master Stormwater Management Plan, as retaining isolated open-channel sections within an otherwise piped stormwater network would have created hydraulic bottlenecks and an increased flood risk (refer Appendix H9.2). The developer complied with this instruction, with only the designated stormwater pond on Erf 3547 remaining unpiped to serve as the approved wetland offset (refer to the offset plan provided in Appendix H2). While the majority of these works were undertaken in accordance with the existing Environmental Authorisation, an external environmental audit (Appendix J2) confirmed that portions of Wetland 7 had been piped beyond the extent authorised under the Environmental Authorisation (refer Figure 4) although the piping of Wetland 7 was authorised under a Water Use Licence issued by the Department of Water and Sanitation in 2015 (Appendix F4), and a wetland offset was complied to mitigate for the loss of onsite ecological functioning (Appendix H2), these approvals did not authorise the additional extent of piping in terms of NEMA. As the additional piping created a larger development area, the developer commenced with a revised development layout without the necessary environmental authorisation. As such implementation of the proposed densified development commenced by means of an unauthorised listed activity in terms of NEMA (Listing Notice 1 Activity19)



Figure 4: In 2018, the Wetland 7 was piped up to the offset area shown in the blue circled area (Infinity Environmental, 2025). The portions of wetland 7 encircled in red were not approved for piping in terms of NEMA.

The densified development layout was subsequently formalised through a Town Planning application for the consolidation of Erven 3303 and 3304, with the revised and densified Site Development Plan being approved by the City of Cape Town on 5 November 2024 (Appendix C). Mandalay Social Housing Project (Pty) Ltd, the current owner of Erf 3733, intends to proceed with the City-approved densified development. The current proposal comprises an increase in residential density from approximately 521 apartment units to approximately 770 apartment units, together with the inclusion of a small retail space and a crèche on the ground floor of one apartment block.

A site assessment undertaken by FEN Consulting (June 2026) found that the unlawfully piped portions of Wetland 7 currently exhibit no hydromorphic soils or hydrophytic vegetation and concluded that these sections most likely did not constitute a natural wetland, but rather an anthropogenic stormwater channel forming part of the City's Master Stormwater Management Plan (Appendix H3). While the feature remains protected as a water resource under the National Water Act, 1998 (Act 36 of 1998), the 2026 assessment concluded that it does not exhibit the characteristics of a natural watercourse for the purposes of NEMA. These findings are discussed in detail elsewhere in this application.

Nevertheless, following consultation with DEA&DP, and the subsequent compliance process, it was determined that the appropriate mechanism to regularise the unlawful development activities and consider the revised development layout was through a Section 24G application in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA). Given that the historical piping of Wetland 7 directly underpins the approved densified development footprint, rehabilitation of the additional piped sections is neither technically feasible nor environmentally appropriate, as it would prevent implementation of the proposed densified development. The proposed densification responds to a significant and well-established need for affordable housing within the area. Accordingly, this Section 24G application seeks Environmental Authorisation for the proposed densification of the approved residential development on Erf 3733. The S24G process is followed after evaluation by DEA&DP, however the EAP regard this conclusion lacking

rational considering the most recent findings of the freshwater ecologist and that a Part 1 Amendment would have been sufficient.

SECTION D: NEED AND DESIRABILITY

Please Note: Before completing this section, first consult this Department's *Guideline on Need and Desirability* (March 2015) available on the Department's website (**http://www.westerncape.gov.za/eadp**).

1. Was the **activity permitted** in terms of the property's land use rights at the time of commencement?	**YES X**	NO	Please explain

At the time of commencement the property was zoned General Residential Zone 2 (GR2). The GR zones promote higher density residential development including blocks of flats. Different development rules apply to different sub zones, particularly with regard to height and floor space, in order to accommodate variations of built form. GR2 specifically permits a hight of 15m and floor space of 50%. The proposed development comprises residential apartment blocks with a maximum height of approximately 13.6m and floor space of 20%. The proposal also includes a crèche and a retail component, both of which are permissible as consent uses within the GR2 zoning. Accordingly, the proposed development was permitted in terms of the property's land use rights at the time.

The proposed development is also in line with the CoCT's densification guidelines. The permissible bulk is 1.0. The proposed bulk is on 0.75 which is les than the permissible bulk. No application is made for any departures in terms of building lines and the development will adhere to the erf's development rules. The proposed development is consistent with the subject property's zoning and development rules and will not adversely affect surrounding property values.

2. Was the activity in line with the following?			
(a) Provincial Spatial Development Framework (PSDF)	**YES X**	NO	Please explain

The Western Cape Provincial Spatial Development Framework (PSDF) provides the overarching spatial vision for the province and guides regional, district and municipal spatial planning initiatives, including Integrated Development Plans (IDPs) and Spatial Development Frameworks (SDFs). The PSDF seeks to promote economic growth, environmental resilience and poverty alleviation by encouraging efficient land use, integrated settlements, improved access to opportunities and infrastructure, and sustainable urban development

The proposed development is consistent with the spatial objectives of the Western Cape PSDF. The proposal represents the densification of an existing, previously authorised housing development within the established urban footprint of the City of Cape Town and therefore promotes more efficient use of land and existing infrastructure, rather than contributing to urban sprawl. Furthermore, the current proposed development constitutes a social housing project as contemplated in the Social Housing Act, 2008 (Act 16 of 2008).

The proposal also supports the PSDF's objective of creating more integrated and inclusive settlements through the inclusion of complementary land uses, namely a neighbourhood retail component and a crèche, which will provide services within walking distance of residents. The development incorporates communal recreational and braai facilities and is located adjacent to existing public transport infrastructure, with pedestrian connectivity between the development and Mandalay Railway Station.

The development will also generate employment opportunities. Construction of the development will generate temporary employment opportunities, while the proposed retail component, crèche, property management, facilities management and ongoing maintenance of the development will create permanent employment opportunities once operational. By providing approximately 770 affordable residential units within a well-located urban area, the proposal also contributes towards restructuring human settlements by increasing access to housing, public transport, community facilities and economic opportunities.

(b) Urban edge / Edge of Built environment for the area	**YES X**	NO	Please explain

The proposed development site is located within the urban edge of the City of Cape Town, and the proposed land use is well aligned with this location.

(c) Integrated Development Plan and Spatial Development Framework of the Local Municipality (e.g. would the approval of this application have compromised the integrity of the existing approved and credible municipal IDP and SDF?).	**YES X**	NO	Please explain

The City of Cape Town 2022–2027 Integrated Development Plan (IDP) sets out the City's vision of "a City of Hope for all – a prosperous, inclusive and healthy city where people can see their hopes of a better future for themselves, their children and their community become a reality." To achieve this vision, the IDP identifies strategic priorities that include the provision of affordable housing, improved public transport, economic growth, quality public spaces and environmental sustainability. These priorities have remained consistent across successive IDPs.

The proposed development is aligned with these strategic priorities and would not compromise the integrity of the approved IDP. The City recognises the shortage of adequate housing as one of Cape Town's most significant challenges and emphasises the need to accelerate housing delivery to meet the needs of a growing population. The proposal will contribute towards addressing this need through the provision of approximately 770 affordable residential units within an established urban area that is already serviced by existing municipal infrastructure. Furthermore, the development constitutes a Social Housing project as contemplated in the Social Housing Act, 2008 (Act 16 of 2008), thereby contributing to the City's objectives of improving access to affordable, well-located housing.

The proposal also supports the IDP's objectives of creating integrated and sustainable communities. In addition to providing affordable housing, the development includes a neighbourhood retail component, a crèche and communal recreational facilities that will enhance community amenity and provide services within walking distance of residents. The retained environmental areas, including the Wetland 7 offset, will continue to be managed in accordance with the Maintenance Management Plan (PHS, July 2026) (Appendix H4) which was submitted to DEA&DP (Directorate: Environmental Law Enforcement) on the 25th of June 2026, ensuring the long-term management of these environmental assets.

The development is further consistent with the transport objectives of the IDP. The site is located adjacent to Mandalay Railway Station and existing public transport routes, promoting the use of public transport and supporting more sustainable travel patterns. Pedestrian connectivity between the development and the railway station will further enhance accessibility for residents.

The proposal is likewise consistent with both the 2012 and 2023 City of Cape Town Municipal Spatial Development Frameworks (MSDFs). The development comprises the densification of an existing, previously authorised residential development within the established urban footprint and therefore promotes the efficient use of well-located land and existing infrastructure rather than outward urban expansion. The site is appropriately located in relation to public transport, community facilities and employment opportunities, making it suitable for higher-density residential development. The inclusion of a neighbourhood retail component and a crèche further supports the creation of a more integrated and accessible neighbourhood by providing complementary land uses within walking distance of residents.

The proposed development will increase the supply of affordable housing in a well-located urban area while making efficient use of existing municipal services and infrastructure. The proposed development is a Social Housing project in terms of the Social Housing Act 16 of 2008. Accordingly, the proposal gives effect to the MSDF's objectives of promoting a more compact, connected and inclusive city through appropriate urban infill and transit-supportive development.

(d) Approved Structure Plan of the Municipality	**YES X**	NO	Please explain

The proposed development is considered to be consistent with the City of Cape Town's spatial planning framework. The site is identified in both the 2012 Khayelitsha, Mitchells Plain and Greater Blue Downs District Plan and the 2023 District Plan as suitable for residential intensification and mixed-use development. Furthermore, the site benefits from existing development rights and an Environmental Authorisation issued in 2011 for a high-density residential development. The current proposal represents a densification of the previously approved development within the approved development footprint and is therefore aligned with

the City's objectives of promoting compact urban form, residential infill, and the provision of affordable housing in well-located areas.

(e) An Environmental Management Framework (EMF) adopted by the Department (e.g. Would the approval of this application have compromised the integrity of the existing environmental management priorities for the area and if so, can it be justified in terms of sustainability considerations?)	**YES X**	NO	Please explain

The Khayelitsha, Mitchells Plain and Greater Blue Downs District Plan (2012) incorporates an Environmental Management Framework (EMF) to guide sustainable spatial planning and environmental decision-making within the district. The EMF seeks to direct development towards appropriate locations while ensuring that environmentally sensitive features are identified, assessed and appropriately managed through the environmental impact assessment process.

The application site is designated as Urban Development in the 2012 District Plan. This Spatial Planning Category is intended to accommodate a range of urban land uses, including residential, community, mixed-use and, where appropriate, commercial development. The proposed densified social housing development, comprising approximately 770 residential units together with a neighbourhood retail component and a crèche, is therefore consistent with the intended land use of the area.

The District Plan further provides that development affecting environmentally sensitive areas should be informed by an environmental impact assessment. The site was previously assessed through the 2011 Environmental Impact Assessment process, following which Environmental Authorisation was granted for a high-density residential development, including the partial piping of Wetland 7. The current Section 24G application arises because additional portions of Wetland 7 were subsequently piped beyond the extent authorised under the 2011 Environmental Authorisation to facilitate the revised development layout. Although the additional piping was undertaken in accordance with an approved Water Use Licence and formed part of the City's broader stormwater management system (Appendix H9.2), the additional extent of piping required environmental authorisation in terms of the National Environmental Management Act, 1998 (Act 107 of 1998), which is now being sought through this Section 24G application.

The application is supported by a Freshwater Ecological Impact Assessment (Appendix H1), together with historical stormwater engineering documentation and correspondence from the City of Cape Town's Catchment, Stormwater and River Management Branch (Appendix H9.2). These communications conclude that the unlawfully piped sections of Wetland 7 now function as part of an engineered stormwater conveyance system and that reinstatement of these sections is neither technically feasible nor environmentally appropriate. To compensate for the historical loss of ecological function, a formal wetland offset was established as part of the Water Use Licence Application in 2015, comprising the retained stormwater pond and associated ecological management area. The offset area will be managed in accordance with the Maintenance Management Plan (PHS, July 2026) (Appendix H4) which was submitted to DEA&DP (Directorate: Environmental Law Enforcement) on the 25th of June 2026,and the Environmental Management Programme (Appendix I), thereby providing for the long-term protection, maintenance and enhancement of aquatic habitat and ecosystem services.

Accordingly, while the historical unauthorised piping of additional portions of Wetland 7 was not consistent with the environmental assessment process envisaged by the EMF, the current Section 24G application provides the mechanism to assess and regularise those activities. Subject to the implementation of the proposed mitigation measures, Environmental Management Programme (Appendix I) and Maintenance Management Plan (Appendix H4), approval of the application would not compromise the environmental management priorities of the EMF. Rather, it would facilitate the continued management of the site's environmental assets while enabling the delivery of much-needed affordable housing within an established urban area, thereby achieving an appropriate balance between environmental protection and sustainable social development.

(f) Any other Plans (e.g. Guide Plan)	**YES X**	NO	Please explain

Integrated Human Settlements Five-Year Sector Plan (2022/23–2026/27):

The proposed development is consistent with the City of Cape Town's Integrated Human Settlements Five-Year Sector Plan (2022/23–2026/27), which identifies social housing as a strategic priority for addressing the City's growing demand for affordable

housing and promoting spatial transformation. The Plan recognises that social housing is the only government-subsidised housing programme that enables high-density affordable rental housing and supports urban regeneration, transit-oriented development and the efficient use of well-located land.The proposed development comprises a social housing project, as contemplated in the Social Housing Act, 2008 (Act 16 of 2008), and is located within a gazetted Social Housing Restructuring Zone (SHRZ), which is intended to provide affordable housing in close proximity to public transport, economic opportunities and social amenities. The proposal will increase the number of affordable housing units from approximately 521 to 770 and includes a neighbourhood retail component and a crèche, thereby supporting the Plan's objectives of maximising residential density on well-located land, promoting mixed-use development, and improving access to housing, services and employment opportunities.

3. Was the land use (associated with the activity for which rectification is sought) considered within the timeframe intended by the existing approved Spatial Development Framework (SDF) agreed to by the relevant environmental authority (i.e. was the development in line with the projects and programmes identified as priorities within the relevant IDP)?	**YES X**	NO	Please explain
The proposed land use, high density social housing development, is consistent with the priorities identified in the City of Cape Town's IDPs and SDFs. The site has been identified for urban development for more than a decade. Environmental Authorisation was granted in 2011 for a high-density residential development, and the principle of residential development on the site has therefore already been accepted. The current proposal does not introduce a new land use but rather increases the residential density of an existing, previously authorised development through the provision of approximately 770 affordable residential units, together with a neighbourhood retail component and a crèche. The proposal aligns with the strategic priorities identified in successive City of Cape Town IDPs, which recognise the provision of affordable housing, integrated human settlements, efficient use of existing infrastructure and improved access to public transport as key municipal priorities. The site is located within the established urban footprint, is designated for Urban Development in the applicable District Plan and MSDF, and is well located in relation to existing public transport and community facilities. Furthermore, the revised Site Development Plan for the densified development was approved by the City of Cape Town on 5 November 2024, confirming that the proposed land use remains consistent with the City's current planning framework and development priorities.			

4. Should development, or if applicable, expansion of the town/area concerned in terms of this land use (associated with the activity being applied for) have occurred here when activities commenced?	**YES X**	NO	Please explain
The application site was considered suitable for urban residential development when the activities commenced and remains appropriate for that land use. The site is located within the established urban footprint of the City of Cape Town and is surrounded by existing residential neighbourhoods, schools, healthcare facilities, public transport infrastructure and other municipal services. The additional piping of Wetland 7 facilitated the implementation of the revised, higher-density development layout, which increases the provision of affordable housing from approximately 521 (as per the current EA) to 770 residential units. The proposal constitutes a Social Housing project in terms of the Social Housing Act, 2008 (Act 16 of 2008), responds to the demonstrated need for affordable housing within Cape Town, and is consistent with the City's objectives of promoting compact, transit-oriented and integrated urban development. Accordingly, while the additional piping required environmental authorisation in terms of NEMA, the resulting densified land use is considered appropriate for the site and is consistent with the applicable spatial planning framework and principles of sustainable development.			

5. Did the community/area need the activity and the associated land use concerned (was it a societal priority)? (This refers to the strategic as well as local level (e.g. development is a national priority, but within a specific local context it could be inappropriate.)	**YES X**	NO	Please explain

Yes. The proposed development responds to a recognised need for affordable housing at a local level. The provision of well-located, higher-density affordable housing is a priority reflected in national legislation, provincial planning frameworks and the City of Cape Town's Integrated Development Plans and Spatial Development Frameworks.

The proposed development constitutes a Social Housing project in terms of the Social Housing Act, 2008 (Act 16 of 2008), and will increase the number of affordable residential units from approximately 521 (as per the current EA) to 770 within an established urban area adjacent to public transport and existing community facilities. The project's strategic importance is further demonstrated by the Consolidated Capital Grant Agreement concluded between the Social Housing Regulatory Authority, the City of Cape Town, IHS Social Housing SA (Pty) Ltd and Mandalay SH Project (Pty) Ltd, which provides public funding for the delivery of the social housing development.

The additional piping of Wetland 7 facilitated the implementation of the revised, higher-density development. While this required environmental authorisation in terms of NEMA, the resulting land use addresses a demonstrated societal need and is appropriate within the local planning context.

6. Were the necessary services with adequate capacity available (at the time of commencement), or was additional capacity created to cater for the development? (Confirmation by the relevant Municipality in this regard must be attached to the Application Form / additional information as an **appendix**, where applicable.)	**YES X**	NO	Please explain
Municipal services required to accommodate the proposed development are available and have sufficient capacity. The development will be serviced by the City of Cape Town, with new service connections established to the site as required. Confirmation of the availability and capacity of the required municipal services, including water, sewer, electricity stormwater, and refuse services has been provided by the City of Cape Town and is attached in Appendix F1–F4. Accordingly, the necessary services were available to support the development, with new connections to be installed as part of the implementation of the approved development.			

7. Is/was this development provided for in the infrastructure planning of the municipality, and if not what was/will the implication be on the infrastructure planning of the municipality (priority and placement of services and opportunity costs)? (Comment by the relevant Municipality in this regard must be attached to the Application Form / additional information as an **appendix**, where applicable.)	YES	NO	Please explain
Residential development of the site has been contemplated by the City of Cape Town for more than a decade, with the principle of development established through the 2011 Environmental Authorisation and subsequently refined through the approved Site Development Plan (dated 4 November 2024) for the proposed densified development. The proposed development will be serviced by the City of Cape Town, and confirmation has been received that adequate capacity exists for the required municipal services (Appendix F1–F4). New service connections will be established to the site as part of the implementation of the development.			

8. Was this project part of a national programme to address an issue of national concern or importance?	YES	**NO X**	Please explain
No. The proposed development does not form part of a specific national programme. However, it is supported by the Western Cape Provincial Social Housing Committee and is recognised by the City of Cape Town as a priority Social Housing project in			

terms of the Social Housing Act, 2008 (Act 16 of 2008). In addition, the Western Cape Department of Infrastructure has confirmed that the development is a Social Housing project located within a designated Restructuring Zone and the CoCT has identified the social housing as a municipal priority programme, with the project qualifying for various municipal incentives and support measures. The proposed development is also supported and has been approved to obtain funding the Social Housing Regulatory Authority (SHRA) (Appendix N). Accordingly, while the project is not part of a specific national programme, it contributes directly to national housing objectives through the delivery of approximately 770 affordable residential units and forms part of a coordinated provincial and municipal social housing programme.

9. Did location factors favour this land use (associated with the activity applied for) at this place? (This relates to the contextualisation of the land use on this site within its broader context.)	**YES X**	NO	Please explain
The location of the site strongly favours the proposed land use. The site is situated within the established urban footprint of the City of Cape Town and is surrounded by existing residential neighbourhoods, schools, healthcare facilities and municipal infrastructure. It is located adjacent to Mandalay Railway Station and in close proximity to existing public transport routes, making it well suited to higher-density residential development. The proposed development comprises a Social Housing project that will increase the supply of affordable housing in a well-located urban area with convenient access to employment opportunities, public transport and community facilities. The inclusion of a neighbourhood retail component and a crèche will further enhance accessibility to essential services for residents.			

10. How did/does the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas (built and rural/natural environment)?	**YES X**	NO	Please explain
The activity impacted on a sensitive environmental feature through the unauthorised piping of additional portions of Wetland 7 beyond the extent authorised by the 2011 Environmental Authorisation. This enabled the implementation of the revised, higher-density development layout and resulted in the loss of ecological function within the affected sections of the watercourse. The application site is, however, located within an established urban environment surrounded by residential development, public infrastructure and community facilities. The retained wetland areas and the approved wetland offset will continue to be managed in accordance with the Maintenance Management Plan and Environmental Management Programme. The application is further supported by a Freshwater Ecological Impact Assessment, which concludes that the unlawfully piped sections now function as an engineered stormwater conveyance system and that reinstatement is neither technically feasible nor environmentally appropriate. No significant impacts on cultural or heritage resources have been identified. Accordingly, subject to the implementation of the proposed mitigation and long-term management measures, the activity is not expected to result in additional significant impacts on sensitive natural or cultural area.			

11. How did/does the development **impact on people's health and wellbeing** (e.g. in terms of noise, odours, visual character and sense of place, etc.)?	YES	**NO X**	Please explain
The piping of additional portions of Wetland 7 did not result in any impacts on people's health and wellbeing, as the site was undeveloped at the time and no residents were affected. The enclosed stormwater system improved stormwater conveyance and reduced the potential for illegal dumping, pollution accumulation and localised flooding. The proposed densified development may result in temporary construction-related impacts, including noise, dust and visual disturbance, which could affect adjacent residents. However, these impacts are not expected to differ materially from those associated with the previously authorised residential development and will be managed through the EMPr. During operation, the increased residential density is not expected to result in significant additional impacts on surrounding residents' health and wellbeing, as the development remains within an established urban area and is consistent with the			

surrounding residential character and approved Site Development Plan. The development will also provide significant positive social benefits through the delivery of approximately 770 affordable residential units, together with a neighbourhood retail component and a crèche.

12. Did/does the proposed activity or the land use associated with the activity applied for, result in **unacceptable opportunity costs**?	YES	**NO X**	Please explain
The proposed land use does not result in unacceptable opportunity costs. The site has been planned and approved for residential development for more than a decade, and the proposed densification represents a more efficient use of well-located urban land and existing municipal infrastructure. Although the additional piping of Wetland 7 resulted in the loss of ecological function within the affected sections, these impacts have been assessed through the Section 24G process and are addressed through the proposed mitigation measures, the established wetland offset and the Maintenance Management Plan. Accordingly, the proposed development will increase the supply of affordable housing in a well-located urban area without resulting in unacceptable opportunity costs.			

13. What were the **cumulative impacts (positive and negative)** of the land use associated with the activity applied for?	YES	NO	Please explain

Positive cumulative impacts:

- Increased provision of affordable social housing.
- More efficient use of well-located urban land and existing infrastructure.
- Improved access to public transport, employment opportunities and community facilities.
- Improved stormwater system functionality and reduced flood risk through a continuous stormwater conveyance system.
- Reduced opportunities for illegal dumping, litter accumulation and stormwater blockages within the previously open stormwater channel.
- Temporary and permanent employment opportunities.

Negative cumulative impacts:

- Temporary construction-related noise, dust and traffic impacts.

14. Is/was the development the **best practicable environmental option** for this land/site?	**YES X**	NO	Please explain
Although the additional piping of Wetland 7 should have been assessed and authorised prior to implementation, it represented the best practicable environmental option for the site. The enclosed stormwater system provides improved stormwater conveyance, reduces the risk of blockages and localised flooding, and minimises illegal dumping, litter accumulation and associated water quality impacts that commonly affect open urban stormwater channels. Furthermore, the retained wetland offset can be more effectively managed and maintained than the modified open channel, thereby providing a more sustainable long-term outcome for the site's aquatic environment. The proposed densified development also makes efficient use of well-located urban land while responding to the demonstrated need for affordable housing.			

15. What are/were the **benefits to society** in general and to the local communities?	Please explain

- Increased provision of approximately 770 affordable social housing units in a well-located urban area.
- Easy access for residents to public transport, employment opportunities and community facilities.
- Provision of a neighbourhood retail component and a crèche to serve residents and the surrounding community.
- Temporary employment during construction and permanent employment associated with the retail component, crèche property management, facilities management and ongoing maintenance of the development.

16. Any other need and desirability considerations related to the activity?	Please explain

- The principle of residential development on the site has been accepted since the Environmental Authorisation issued in 2011, with the current application seeking approval for a densified development rather than a new land use.
- The revised Site Development Plan has been approved by the City of Cape Town, confirming the suitability of the proposed land use within the municipal planning framework.
- The proposed development forms part of a priority Social Housing project supported by the City of Cape Town, the Western Cape Department of Infrastructure and the Social Housing Regulatory Authority (Appendix N).
- Reinstatement of the additional piped sections of Wetland 7 is neither technically feasible nor environmentally appropriate, as the stormwater system has been established and forms part of the City's stormwater network. The Section 24G application therefore provides the appropriate mechanism to assess and regularise the unauthorised activities while ensuring the implementation of appropriate mitigation and long-term environmental management measures.

17. Please describe how the **general objectives of Integrated Environmental** Management as set out in section 23 of NEMA (as amended) were taken into account:

The purpose of Section 23 of NEMA is to promote the application of appropriate environmental management tools in order to ensure the integrated environmental management of activities. The listed activities currently under investigation have already taken place, while the remainder of the proposed development will be implemented following the outcome of this application. The general objectives of Integrated Environmental Management have been, and will continue to be, taken into account through the following:

- An Environmental Impact Assessment was undertaken for the original development, culminating in the Environmental Authorisation issued in 2011.
- Specialist freshwater assessments have been undertaken to assess the impacts of the unauthorised piping of additional portions of Wetland 7 and the proposed densified development, and to identify appropriate mitigation measures (FEN August 2026).
- A wetland offset was established as part of the Water Use Licence to compensate for the loss of ecological function associated with the piping of Wetland 7 (BlueScience, March 2015).
- A Maintenance Management Plan has been prepared to provide for the long-term management of Wetland 3, the wetland offset and associated stormwater infrastructure (PHS, June 2026).
- The specialist reports along with the current application identifies, predicts, assesses, and communicates the actual and potential impacts associated with the development activities that have already been undertaken and the proposed development still to be undertaken. Suitable mitigation measures have been identified and outlined and will be implemented onsite to address these impacts.
- An Environmental Management Programme has been prepared to ensure that the remainder of the development is implemented in accordance with appropriate environmental management measures PHS, August 2026).
- The public participation processes will be implemented as per the EIA Regulations 2014 and DEA&DP's guidelines on PPP which will allow sufficient opportunity for public consultation. An advertisement will be placed in a newspaper, informing members of the public of the application and available information. Details on how members of the public can register as interested and affected parties (I&APs) will be included. Other stakeholders (ward councillor, local authorities, adjacent landowners, organs of state, state departments, etc.) will be identified and notified of the process. A site notice will be placed on site.

18. Please describe how the **principles of environmental management** as set out in section 2 of NEMA were taken into account:

The aim of the principles of environmental management as set out in section 2 of NEMA is to guide stakeholders to undertake a holistic evaluation of the proposed development activities and to ensure that the precautionary principle is applied to encourage sustainable development. The application is supported by specialist freshwater assessments and relevant planning information to assess impacts and identify appropriate mitigation measures. The application provides for the long-term management of environmental resources through the established wetland offset, the MMP and the EMPr and public participation will be undertaken in accordance with the NEMA EIA Regulations. Accordingly, the application promotes sustainable development by balancing environmental protection with the provision of well-located affordable social housing.

SECTION E: ALTERNATIVES

Please Note: Before completing this section, first consult this Department's *Guideline on Alternatives* (March 2015) available on the Department's website (**http://www.westerncape.gov.za/eadp**).

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

(a) the property on which, or location where, it is to undertake the activity/the activity was undertaken;

(b) the type of activity to be undertaken;

(c) the design or layout of the activity;

(d) the technology to be used in the activity;

(e) the operational aspects of the activity; and

(f) the option of not implementing the activity.

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

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

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

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

Please note:

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

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

No reasonable or feasible property or location alternatives exist. The application relates to the densification of an existing, previously authorised residential development on a site that has been identified for urban development for more than a decade. The site is well suited to higher-density affordable housing due to its location within the established urban footprint, proximity to public transport, existing municipal infrastructure and community facilities. The additional piping of Wetland 7 has already been completed and forms part of the City's stormwater system. Reinstatement is neither technically feasible nor environmentally appropriate, as it would compromise the functioning of the existing stormwater network, increase the risk of blockages, flooding, illegal dumping and water quality impacts, and prevent implementation of the approved densified development. The retained wetland offset also provides a more practical long-term environmental management solution. Accordingly, the current site and development represent the most appropriate planning and environmental outcome.

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

No reasonable or feasible activity alternatives exist. The site is located within the urban edge and existing services are available. The only alternative would be reduced density as per the current Environmental Authorisation.

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

The principal design alternative was a lower-density residential development (approximately 521 residential units, as provided for in the existing Environmental Authorisation) rather than the current City-approved densified development (approximately 770 residential units with a neighbourhood retail component and crèche). The densified development is considered the preferred alternative as it responds to the demonstrated need for affordable housing while making more efficient use of well-located urban land and existing infrastructure. No reasonable alternative exists to the historical piping of Wetland 7, which has already been completed and forms part of the City's stormwater network. Wetland 3 and the wetland offset have been retained and will be managed in accordance with the Maintenance Management Plan.

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

The proposed development incorporates a range of resource-efficiency measures, including water-efficient sanitary fittings, dual-flush toilets, low-flow taps and shower fittings, energy-efficient LED lighting, efficient building orientation and insulation, water-wise landscaping where applicable, and a solar photovoltaic system for water heating to reduce electricity demand.

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

No reasonable or feasible operational alternatives exist. The site will operate as a high-density residential development irrespective of whether the previously authorised development or the proposed densified development is implemented, and Wetland 7 will remain piped as part of the City's stormwater network. Operational impacts will be minimised through the implementation of the Environmental Management Programme and Maintenance Management Plan, including the long-term management of Wetland 3, the wetland offset and stormwater infrastructure. The proposed development also incorporates resource-efficient measures to reduce water and energy consumption during operation.

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

Ceasing the activity and rehabilitating the site is not considered a reasonable or feasible alternative. The additional piping of Wetland 7 has already been completed and forms part of the City's stormwater network. Reinstating the historical stormwater channel would not be technically feasible or environmentally appropriate, as it would compromise the functioning of the existing stormwater system and prevent implementation of the City-approved social housing development. Furthermore, the proposed densified development responds to a demonstrated social and economic need by increasing the supply of affordable social housing in a well-located urban area, making efficient use of existing infrastructure and supporting broader government housing objectives. The proposed social housing development is supported by the City of Cape Town, the Western Cape Department of Infrastructure and the Social Housing Regulatory Authority (SHRA) (Appendix N).

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

No other reasonable or feasible alternatives have been identified. The proposed development represents the most appropriate planning and environmental outcome for the site, with potential impacts avoided or minimised through the implementation of the Environmental Management Programme and Maintenance Management Plan to facilitate the long-term management of the wetland offset.

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

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

The principal alternative investigated was a lower-density residential development (approximately 521 residential units) as provided for in the existing Environmental Authorisation, compared to the proposed City-approved densified development (approximately 770 residential units with a neighbourhood retail component and crèche). The proposed densified development was identified as the preferred alternative as it responds to the demonstrated need for affordable social housing while making more efficient use of well-located urban land and existing infrastructure. The densification is in line with the CoCT policies. The proposed social housing development is supported by the City of Cape Town, the Western Cape Department of Infrastructure and the Social Housing Regulatory Authority (SHRA) (Appendix N).

No reasonable or feasible alternatives exist to the historical piping of Wetland 7, which has already been completed and forms part of the City's stormwater network. Reinstating the historical stormwater channel is neither technically feasible nor environmentally appropriate, as it would compromise the functioning of the existing stormwater system and prevent implementation of the approved densified development.

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

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

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

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

(a) Geographical and physical aspects:

The unauthorised piping of additional portions of Wetland 7 altered the site's physical characteristics by replacing sections of an open stormwater channel with an underground stormwater system. The proposed densified development will increase the residential density within an established urban area but will not alter the broader geographical context or surrounding land use pattern.

(b) Biological aspects:

Has the development impacted on **critical biodiversity areas (CBAs) or ecological support areas (ESAs)?**	YES	**NO X**
If yes, please describe:		
n/a		
Has the development impacted on **terrestrial vegetation, or aquatic ecosystems** (wetlands, estuaries or the coastline)?	**YES X**	NO
If yes, please describe:		
The development has not resulted in additional impacts on terrestrial vegetation, as vegetation clearing was authorised under the 2011 Environmental Authorisation. The unauthorised activity relates to the piping of additional portions of Wetland 7 beyond the extent authorised in the 2011 Environmental Authorisation. The associated site preparation, earthworks, removal of topsoil and vegetation, excavation, stockpiling and infilling resulted in changes to hydrological functioning, geomorphological processes and aquatic habitat. Potential impacts included changes in flow patterns and water quality, as well as increased erosion and sedimentation and the loss of the remaining open-channel habitat within the affected area. However, the 2026 Freshwater Impact Assessment confirmed that Wetland 7 was an anthropogenic stormwater channel and water resource rather than a natural wetland. The affected portions have been completely piped and currently show no hydromorphic soil characteristics or hydrophytic vegetation, having reverted to a terrestrial condition. The assessment therefore concluded that the feature was most likely never a true natural watercourse. Nevertheless, the system still facilitates hydrological connectivity between the catchment area north of the site and the wetland offset area (stormwater pond) through the piped stormwater channel ("Wetland 7"). The wetland offset south of the site was established to compensate for the loss of ecological function associated with the development of erf 776, including the piping of Wetland 7. The offset will be managed in accordance with the Maintenance Management Plan (PHS Consulting, June 2026). The wetland offset south of the site was established to compensate for the perceived loss of aquatic ecological functioning associated with the development of Erf 776, including the piping of Wetland 7, and will be managed in accordance with the Maintenance Management Plan (PHS Consulting, June 2026). The Freshwater Impact Assessment confirms that, although minor temporary impacts may occur during active rehabilitation of the offset area, the long-term implementation and management of the offset is expected to result in a net positive impact on the ecological condition and ecosystem service provisioning of the offset area. Accordingly, the historical aquatic impacts associated with the piping have been addressed through the wetland offset, with the long-term freshwater outcome expected to be net positive.		
Has the development impacted on any **populations of threatened plant or animal species**, and/or on any habitat that may contain a unique signature of plant or animal species?	YES	**NO X**
If yes, please describe:		
Please describe the manner in which any other biological aspects were impacted:		
n/a		

(c) Socio-Economic aspects:

What was the capital value of the activity on completion?	R443 million (will be, not yet complete)	
What is the (expected) yearly income or contribution to the economy that is/will be generated by or as a result of the activity?	R UNCERTAIN	
Has/will the activity have contributed to service infrastructure?	**YES X**	NO
How many new employment opportunities were/will be created in the construction phase of the activity?	>300 expected	
What was the value of the employment opportunities during the construction phase?	The construction phase is expected to create approximately 300 employment opportunities over a 24-month period. The estimated value of wages paid during the construction phase is approximately R38.3 million.	
What percentage of this accrued to previously disadvantaged individuals?	100%	

How was this ensured and monitored (please explain):

Employment opportunities will be promoted through:

1. Recruitment from surrounding communities.
2. Appointment of local subcontractors where possible.
3. Monitoring by the principal contractor and developer.

How many permanent new employment opportunities were/will be created during the operational phase of the activity?	20-25 expected
What is the current/expected value of the employment opportunities during the first 10 years?	Approximately R2 million per annum
What percentage of this accrued/will accrue to previously disadvantaged individuals?	90-100%

How was/will this be ensured and monitored (please explain):

Employment opportunities will be promoted through:

1. Recruitment from surrounding communities.
2. Appointment of local subcontractors where possible.
3. Monitoring by the principal contractor and developer.

Any other information related to the manner in which the socio-economic aspects was/will be impacted:

The proposed development will make a significant positive contribution to the provision of affordable social housing within the City of Cape Town. The proposed social housing development is supported by the City of Cape Town, the Western Cape Department of Infrastructure and the Social Housing Regulatory Authority (SHRA) (Appendix N). By increasing the residential yield on well-located urban land, the development will improve access to housing, public transport, employment opportunities and community facilities, while supporting the creation of a more compact, integrated and inclusive urban environment in line with national, provincial and municipal planning objectives.

(d) Cultural and historic aspects:

The heritage assessment undertaken for the original Erf 776 as part of the 2011 Environmental Authorisation process did not identify any significant heritage resources on the site. The current application relates to land that formed part of the original Erf 776, and the nature of the proposed development remains consistent with that previously assessed. Accordingly, there is no reason to conclude that the heritage sensitivity of the site has changed, and the findings of the 2011 heritage assessment are therefore considered to remain applicable to the current proposal. A Notice of Intent to develop was submitted to HWC, as part of the 2011 EIA application the outcome of which stated that no further assessments would be required. It is the EAP's opinion that since the development has an EA which is in force and the footprint of the development remains within the approved site boundaries, it will not trigger any further heritage resources activities. Comment will, however, be sought from HWC on the proposed amendments.

2. WASTE AND EMISSIONS

(a) Waste (including effluent) management

Did the activity produce waste (including rubble) during the construction phase?	**YES X**	**NO X**
If yes, indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type?		
General Construction waste will be produced during the construction of the densified development	Unknown m^3	

Does the activity produce waste during its operational phase?	**YES X**	NO
If yes, indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type?		
Domestic Waste	±55 m^3	
Sewage	±246.96 kl/d	

Where and how was/will the waste be treated / disposed of (describe)?		
Domestic waste will be collected by the City of Cape Town. Municipal wheelie bins will be provided, and refuse will be collected from the kerbside on scheduled municipal collection days. Residents will be responsible for placing bins on the public sidewalk for collection. Sewage will be treated at the Mitchells Plain WwTW.		
Has the municipality or relevant authority confirmed that sufficient capacity exists for treating / disposing of the waste (to be) generated by this activity(ies)? If yes, provide written confirmation from Municipality or relevant authority **(Please refer to Appendix M1 and Appendix M4)**	**YES X**	NO
Does/will the activity produce waste that is/will be treated and/or disposed of at another facility other than into a municipal waste stream?	YES	**NO X**
If yes, has this facility confirmed that sufficient capacity exists for treating / disposing of the waste (to be) generated by this activity(ies)? Provide written confirmation from the facility and provide the following particulars of the facility: **n/a**	YES	NO
Does the facility have an operating license? (If yes, please attach a copy of the license.) **n/a**	YES	NO
~~Facility name:~~		

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

Describe the measures that were/will be taken to reduce, reuse or recycle waste:
The development will make use of the City of Cape Town's weekly municipal refuse collection service. Each two residential units will share one refuse bin. General workers will manage the placement and collection of clean bins from the common areas and residential blocks, with bins stored in the designated refuse yard following collection and cleaned before being returned to the relevant areas.

(b) Emissions into the atmosphere

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

3. WATER USE

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

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

If water was extracted from a groundwater source, river, stream, dam, lake or any other natural feature, please indicate the volume that was extracted per month:	m^3

Please provide proof of assurance of water supply (e.g. Letter of confirmation from municipality / water user associations, yield of borehole) **Please refer to Appendix F1**		
Did/does the activity require a water use permit / license from DWA?	**YES X**	NO
If yes, please submit a certified copy of the water use permit/license or submit the necessary application to Department of Water Affairs and attach proof thereof to this application, whichever is applicable. **A water use license has been obtained for the S21(c) and (i) water uses associated with site development (refer Appendix F4)**		
Describe the measures that were/ will be taken to reduce water demand, and measures to reuse or recycle water:		

The development incorporates several resource-efficiency measures, including: 1. Water-efficient sanitary fittings. 2. Dual-flush toilet systems. 3. Low-flow taps and shower fittings. 4. Energy-efficient LED lighting. 5. Energy-efficient appliances where applicable. 6. Efficient building orientation and insulation. 7. Water-wise landscaping where applicable.

4. POWER SUPPLY

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

City of Cape Town Municipality

If power supply is not available, where will power be sourced from?
n/a

5. ENERGY EFFICIENCY

Describe the design measures, if any, that have been taken to ensure that the activity is energy efficient:
Solar PV System will be used for water heating which will reduce the reliance on the electricity for water heating.

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

Solar PV System will be used for water heating which will reduce the reliance on the electricity for water heating.

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

Please note:

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

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

Impacts on geographical and physical aspects:	
	Proposed Densified Development Layout (770 units)
Nature of impact:	**Alteration of physical site geography and drainage: The additional piping of Wetland 7 and increased development intensity will result in greater built form, earthworks and soil disturbance within the existing development footprint.**
Extent and duration of impact:	**Local and long term**
Probability of occurrence:	**Probable**
Degree to which the impact can be reversed:	**Low**
Degree to which the impact may cause irreplaceable loss of resources:	**Unlikely**

Cumulative impact prior to mitigation:	**Low Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Possible (Retrospective)**
Proposed mitigation:	• **Implement the CoCT approved stormwater management plan to manage runoff from the proposed development and prevent erosion.** • **Maintain and manage the piped Wetland 7 stormwater system to ensure continued functionality.** • **Maintain the existing hydrological connection between the northern catchment and the wetland offset area (stormwater pond) through the piped stormwater channel (Wetland 7), and ensure that stormwater runoff from the proposed development is routed to the existing wetland offset area.** • **Maintain and manage the stormwater pond on Erf 3547 which has been designed as the wetland offset for the full piping of Wetland 7.** • **Manage and maintain the offset area to enhance its ecological condition and ecosystem service provisioning.** • **Implement appropriate erosion and sediment-control measures during construction.** • **Restrict construction activities and material storage to the approved development footprint.**
Cumulative impact post mitigation:	**n/a – offset relevant**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**N/A OFFSET RELEVANT**

Impact on biological aspects:	
Nature of impact:	**Alteration and loss of aquatic habitat and ecological functioning associated with the piping of portions of Wetland 7 beyond the authorised extent.**
Extent and duration of impact:	**Local and Long Term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**Very Low**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Low**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Moderate**
Proposed mitigation:	• **Implement and maintain the approved wetland offset (BlueScience, 2015) in accordance with the applicable Water Use Licence requirements.** • **Implement the Maintenance Management Plan (MMP) (PHS Consulting, 2026) to ensure the ongoing management and maintenance of the wetland offset area.** • **Maintain the existing hydrological connection between the northern catchment and the wetland offset area (stormwater pond) through Wetland 7, and ensure that stormwater runoff from the proposed development is routed to the existing wetland offset area.**
Cumulative impact post mitigation:	**n/a – offset relevant**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**N/A OFFSET RELEVANT**

Impact on biological aspects:	
Nature of impact:	**Potential indirect impact on Wetland 3 (west of the proposed development site) from increased development intensity.**
Extent and duration of impact:	**Local and Long Term**
Probability of occurrence:	**Possible**
Degree to which the impact can be reversed:	**Good**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Low**

Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Moderate**
Proposed mitigation:	• **Maintain the 15 m construction and operational buffer around Wetland 3 as identified by the Freshwater Impact Assessment (FEN, August 2026)** • **Ensure that stormwater runoff from the development is managed and directed to the existing stormwater pond forming part of the wetland 7 offset area, rather than directly towards Wetland 3.** • **Prevent the storage of construction materials, waste or equipment within the 15 m buffer.** • **Position the development boundary wall to accommodate and maintain the full 15 m buffer around Wetland 3 as per the Freshwater Impact Assessment (FEN, August 2026).**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**N/A – No impact anticipated**

Impact on biological aspects:	
Nature of impact:	**Temporary disturbance of the wetland offset area on Erf 3547 during rehabilitation.**
Extent and duration of impact:	**Local and Short Term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**Good**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Low**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Moderate**
Proposed mitigation:	• **Implement and maintain the approved wetland offset in accordance with the applicable Water Use Licence requirements.** • **Implement the Maintenance Management Plan (MMP) to ensure the ongoing management and maintenance of the wetland offset area.** • **Incorporate the establishment of obligate and facultative hydrophytes within the wetland offset** • **Remove excess sediment, debris and litter from the offset area on a continual basis in accordance with the MMP.** **Please note: While the long-term impacts of this phase are considered to be a nett positive, the active works thereof may result in disturbances to soil resulting in compaction and erosion, and water quality impacts due to movement of machinery and personnel within the area, but only during the active rehabilitation phase.**
Cumulative impact post mitigation:	**Very Low negative during construction and positive in the long term**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**SHORT TERM: VERY LOW NEGATIVE** **LONG TERM: POSITIVE**

Impacts on socio-economic aspects:	
Nature of impact:	**Temporary employment opportunities (direct and indirect) generated during construction**
Extent and duration of impact:	**Regional and Short Term**
Probability of occurrence:	**High**
Degree to which the impact can be reversed:	**Not needed**
Degree to which the impact may cause irreplaceable loss of resources:	**None**
Cumulative impact prior to mitigation:	**Medium positive**

Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM POSITIVE**
Degree to which the impact can be mitigated:	**Not needed**
Proposed mitigation:	**Local Contractors**
Cumulative impact post mitigation:	**Medium-High positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM-HIGH POSITIVE**

Impacts on socio-economic aspects:	
Nature of impact:	**Stimulation of the local economy and supply chain through the procurement of goods and services during construction.**
Extent and duration of impact:	**Regional and Short Term**
Probability of occurrence:	**High**
Degree to which the impact can be reversed:	**Not needed**
Degree to which the impact may cause irreplaceable loss of resources:	**None**
Cumulative impact prior to mitigation:	**Medium positive**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM POSITIVE**
Degree to which the impact can be mitigated:	**Not needed**
Proposed mitigation:	**Local Contractors**
Cumulative impact post mitigation:	**Medium-High positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM-HIGH POSITIVE**

Impacts on cultural-historical aspects:	
Nature of impact:	**No Impact Anticipated**
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Noise impacts:	
Nature of impact:	**Potential noise nuisance of construction works to surrounding neighbours**
Extent and duration of impact:	**Local and Short Term**
Probability of occurrence:	**Probable**
Degree to which the impact can be reversed:	**Moderate**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Medium Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Moderate**
Proposed mitigation:	• **Plan construction activities to minimize noisy work during sensitive hours (e.g., early mornings, evenings, weekends, or holidays).** • **Restrict working hours to day-time hours during weekdays and half day Saturday. No work on Sundays and public holidays.**

	• Awareness of site of workers to keep noise levels down during working hours. • All vehicles and machinery/equipment used onsite must be regularly maintained and kept in good working order to prevent excessive noise. • Avoid unnecessary idling of vehicles and machinery. • Maintain an open line of communication with the local community to inform them about the construction schedule • Maintain a complaints register and investigate and address noise complaints promptly. • Establish a dedicated contact person to address noise related issues. • The Western Cape Noise Control Regulations (P.N. 200/2013) must be adhered to. **Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.**
Cumulative impact post mitigation:	**Low Negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Dust impacts:	
Nature of impact:	**Dust generation during the construction phase**
Extent and duration of impact:	**Local and Short Term**
Probability of occurrence:	**High (particularly during dry & windy periods)**
Degree to which the impact can be reversed:	**Highly reversible**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Low-Medium Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW-MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Moderate**
Proposed mitigation:	• Clear land areas in phases as required for construction purposes to minimize unnecessary exposure of bare ground. • Schedule construction activities to minimize the amount of disturbed soil at any given time. • Cleared areas must be suitably stabilised (e.g. through the use of mulch or straw) to prevent dust generation. • Shield dust blowing onto adjacent roads and adjacent land users. • Dissipate dust with water if needed, however care must be taken that this does not result in excess runoff. • A suitable speed limit (20-40km/h) must be enforced on all internal access roads. • Control the flow of vehicles to minimize dust generated during entry and exit from the site. • Train construction workers (as part of general environmental awareness training) on dust control practices and the importance of reducing dust emissions. • Provide personal protective equipment (PPE), such as dust masks, for workers who may be exposed to dust. • Establish suitable indigenous landscaping between developed blocks. • Ensure all intervening areas between buildings and roads are appropriately vegetated • The National Environmental Management: Air Quality Act, National Dust Control Regulations (Government Notice No. R. 827) of 1 November 2013 must be adhered to **Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.**

Cumulative impact post mitigation:	**Low Negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Visual impacts / Sense of Place:	
Nature of impact:	**Visual impacts during construction activities**
Extent and duration of impact:	**Local and short term**
Probability of occurrence:	**Possible**
Degree to which the impact can be reversed:	**Possible**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Low Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Possible**
Proposed mitigation:	- **Clear land areas in phases as required for construction purposes to prevent unnecessary exposure of large portions of bare ground.** **Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.**
Cumulative impact post mitigation:	**Low Negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Traffic Impacts:	
Nature of impact:	**Intensified use of access roads to facilitate construction potentially resulting in congestion.**
Extent and duration of impact:	**Local and short term**
Probability of occurrence:	**Probable**
Degree to which the impact can be reversed:	**Moderate**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Low Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Possible**
Proposed mitigation:	- **Minimize the number of vehicles accessing the site to what is strictly necessary for construction purposes.** - **Ensure construction vehicles use designated access routes and do not obstruct public roads.** - **Provide a single vehicular access from Stinkwood Road, with access control gates set back 12 m into the site to accommodate vehicle stacking.** - **Clearly define entry and exit points for construction vehicles and personnel. This reduces confusion and congestion.** - **Provide adequate on-site space for loading, unloading and turning to prevent vehicles queuing on public roads** - **Use appropriate, highly visible temporary signage and traffic controls, including speed limits, detour and construction-zone warning signs, to safely manage construction vehicle movements.** - **Maintain access for surrounding residents, pedestrians and public transport throughout construction.** - **Designate safe pedestrian pathways, preferably separate from vehicle traffic. Use barriers to protect pedestrians.** - **Clearly mark designated parking areas for construction vehicles to prevent them from obstructing roadways.** - **Plan construction activities to minimize the impact on traffic during peak hours. Whenever possible, schedule work during off-peak times.**

	Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.
Cumulative impact post mitigation:	**Low Negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW Negative**

Waste Impacts:	
Nature of impact:	**Waste generation from construction activities – general construction waste.**
Extent and duration of impact:	**Local and short term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**Low**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Low Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Possible**
Proposed mitigation:	- **Minimise new materials brought on site.** - **No burning of waste on site –** - **Maximise recycling of waste from construction activities.** - **Provide portable toilets where work is being undertaken (1 toilet per 10 workers). These toilets must be located on level ground and more than 32m from the edge of any delineated watercourses. Portable toilets must be regularly serviced and maintained. –** - **Provide an adequate number of bins on site and encourage construction personnel to dispose of their waste responsibly. –** - **Waste should be stored in closed containers to prevent dispersal by wind.** - **Waste generated by construction personnel must be removed from the development area and disposed of at a registered waste disposal facility on a weekly basis.** - **No material (incl. excavated material, building materials or removed vegetation) may be stockpiled, temporarily stored, or dumped within 32m of the delineated watercourses** - **Spoil material must be appropriately disposed of at a registered waste disposal facility.** - **The Contractor must ensure that no building rubble or waste is left behind onsite.** - **All construction waste must be disposed of at an appropriate registered facility.** **Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.**
Cumulative impact post mitigation:	**Low Negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW Negative**

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

Impacts on the geographical and physical aspects:	
Nature of impact:	**Increased development intensity and associated hard surfaces may increase stormwater runoff within the existing development footprint.**
Extent and duration of impact:	**Local and Long Term**
Probability of occurrence:	**Probable**

Degree to which the impact can be reversed:	**Low**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Low-Medium Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW-MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Moderate**
Proposed mitigation:	**- Implement the CoCT approved stormwater management plan to manage runoff from the proposed development and prevent erosion.** **- Maintain and manage the piped Wetland 7 stormwater system to ensure continued functionality.** **- Maintain the existing hydrological connection between the northern catchment and the wetland offset area (stormwater pond) through the piped stormwater channel (Wetland 7), and ensure that stormwater runoff from the proposed development is routed to the existing wetland offset area.** **- Maintain and manage the stormwater pond on Erf 3547 which has been designed as the wetland offset for the full piping of Wetland 7.** **- Manage and maintain the offset area to enhance its ecological condition and ecosystem service provisioning.** **- Keep stormwater infrastructure clear of litter, debris and blockages through regular maintenance** **- Implement the EMPr and relevant provisions of the MMP.** **- All undeveloped areas within the development footprint shall be suitably landscaped in accordance with the approved landscaping plan (Appendix P) to minimise hard surfaces, improve biodiversity and promote stormwater infiltration**
Cumulative impact post mitigation:	**N/A – Offset Relevant**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**N/A – OFFSET RELEVANT**

Impact on biological aspects:	
Nature of impact:	**Long-term management and maintenance of the designated Wetland 7 offset area**
Extent and duration of impact:	**Local and Long Term**
Probability of occurrence:	**Probable**
Degree to which the impact can be reversed:	**Not Needed**
Degree to which the impact may cause irreplaceable loss of resources:	**None**
Cumulative impact prior to mitigation:	**Low Positive**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**
Degree to which the impact can be mitigated:	**Not needed**
Proposed mitigation:	**Not needed**
Cumulative impact post mitigation:	**Low Positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**

Impacts on the socio-economic aspects:	
Nature of impact:	**Increased number of social housing units developed and available for occupancy**
Extent and duration of impact:	**Local and Long Term**
Probability of occurrence:	**High**
Degree to which the impact can be reversed:	**Not Needed**
Degree to which the impact may cause irreplaceable loss of resources:	**None**
Cumulative impact prior to mitigation:	**Medium-High Positive**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM-HIGH POSITIVE**
Degree to which the impact can be mitigated:	**Not Needed**
Proposed mitigation:	**Not Needed**
Cumulative impact post mitigation:	**Medium-High Positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM-HIGH POSITIVE**

Impacts on the socio-economic aspects:	
Nature of impact:	**Permanent job creation during operation of the retail component and creche**
Extent and duration of impact:	**Local and Long Term**
Probability of occurrence:	**High**
Degree to which the impact can be reversed:	**Not Needed**
Degree to which the impact may cause irreplaceable loss of resources:	**None**
Cumulative impact prior to mitigation:	**Medium Positive**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM POSITIVE**
Degree to which the impact can be mitigated:	**Not Needed**
Proposed mitigation:	**Employ Locals**
Cumulative impact post mitigation:	**Medium-High Positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM-HIGH POSITIVE**

Impacts on the cultural-historical aspects:	
Nature of impact:	**No Impact Anticipated**
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Noise impacts:	
Nature of impact:	**Increased general residential noise associated with increased development density**
Extent and duration of impact:	**Local and Long Term**
Probability of occurrence:	**Possible**
Degree to which the impact can be reversed:	**Low**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Low Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Low**
Proposed mitigation:	• **Ensure compliance with applicable City of Cape Town noise control requirements.** **Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.**
Cumulative impact post mitigation:	**No impact anticipated**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**NO IMPACT ANTICIPATED**

Visual impacts / Sense of Place:	
Nature of impact:	**Potential visual impact as a result of a higher-density development**
Extent and duration of impact:	**Local and Long Term**
Probability of occurrence:	**Possible**
Degree to which the impact can be reversed:	**Low**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Low Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be mitigated:	**Moderate**

Proposed mitigation:	• **Ensure building heights remain below 15 m, in accordance with the GR2 zoning.** • **Implement the CoCT approved building plan which takes existing resident's concerns into account.** • **Maintain landscaping and communal open spaces throughout the operational phase.** **Please note that the anticipated impacts are not expected to differ materially from those that would have occurred during construction of the currently approved 521-unit development.**
Cumulative impact post mitigation:	**NO IMPACT ANTICIPATED**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**NO IMPACT ANTICIPATED**

Traffic impacts	
Nature of impact:	**Potential traffic related impacts during operation of the development**
Extent and duration of impact:	**Local and Long Term**
Probability of occurrence:	**Possible**
Degree to which the impact can be reversed:	**Low**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Low-Medium Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW-MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Moderate**
Proposed mitigation:	• **A dedicated left-turn lane should be provided on Hillcrest Road at the Swartklip Road/Hillcrest Road intersection.** • **A one-way stop should be introduced on Hillcrest Road at the Montclair Drive/Hillcrest Road intersection.** • **A single vehicle access point should be provided from Stinkwood Road, with the access gates set 12 m back from the road.** • **Pedestrian access should be provided on both sides of the site access road.** • **Internal sidewalks should be at least 1.5 m wide.** • **Parking should be provided at a ratio of 0.53 bays per residential unit, with additional parking for the crèche and retail uses.**
Cumulative impact post mitigation:	**Low Negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Resource Use Impacts:	
Nature of impact:	**Increased demand for service provision and resource usage**
Extent and duration of impact:	**Local and Long Term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**Low**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Low-Medium Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW-MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Moderate**
Proposed mitigation:	• **Water-efficient sanitary fittings, including dual-flush toilets and low-flow taps and shower fittings, must be installed.** • **Energy-efficient LED lighting and appliances must be used where applicable.** • **Building orientation and insulation must be optimised to improve energy efficiency.** • **Water-wise landscaping must be implemented where applicable.** • **The solar PV system for water heating must be installed and maintained to reduce electricity demand.** • **Recycling must be implemented where practicable.**
Cumulative impact post mitigation:	**Low Negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Waste Impacts:	
Nature of impact:	**Increased generation of domestic waste during the operational phase**
Extent and duration of impact:	**Local and Long Term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**Low**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Cumulative impact prior to mitigation:	**Low-Medium Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW-MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Moderate**
Proposed mitigation:	• **Domestic waste must be collected regularly by the City of Cape Town in accordance with the municipal waste collection schedule.** • **Adequate waste bins must be provided for all residential and ancillary uses.** • **Waste storage areas must be kept clean, secure and free of litter.** • **Recycling and waste separation must be encouraged where practicable.** • **Waste must not be disposed of in or near a wetland, stormwater system or open areas.**
Cumulative impact post mitigation:	**Low Negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

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

Potential impacts on the geographical and physical aspects:	
Nature of impact:	**Excavation and removal of existing stormwater infrastructure, resulting in soil disturbance, dust and noise**
Extent and duration of impact:	**Local and Short Term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**Low**
Degree to which the impact may cause irreplaceable loss of resources:	**Possible**
Cumulative impact prior to mitigation:	**Medium Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Low**
Proposed mitigation:	**Limit demolition and rehabilitation activities to the minimum required area and implement appropriate dust, noise, erosion, sediment and waste management measures.**
Cumulative impact post mitigation:	**Low Negative**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

Potential impact on biological aspects:	
Nature of impact:	**Altering the established Wetland 7 stormwater system could disrupt drainage, increase flood risk and result in potential water quality impacts.**
Extent and duration of impact:	**Local and Long Term**
Probability of occurrence:	**High**
Degree to which the impact can be reversed:	**Low**
Degree to which the impact may cause irreplaceable loss of resources:	**Possible**
Cumulative impact prior to mitigation:	**Medium Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Low**
Proposed mitigation:	**Retain the established Wetland 7 stormwater system and avoid alterations that could compromise drainage capacity, increase flood risk on water pollution.**
Cumulative impact post mitigation:	**Low Negative**
Significance rating of impact after mitigation (Low, **Medium, Medium-High, High**, or Very-High)	**SHORT TERM: VERY LOW NEGATIVE** **LONG TERM: POSITIVE**

Potential impacts on the socio-economic aspects:	
Nature of impact:	**Reduced provision of social housing units and employment opportunities**
Extent and duration of impact:	**Local and Long Term**
Probability of occurrence:	**High**
Degree to which the impact can be reversed:	**Low**
Degree to which the impact may cause irreplaceable loss of resources:	**Possible**
Cumulative impact prior to mitigation:	**Medium Negative**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM NEGATIVE**
Degree to which the impact can be mitigated:	**Possible**
Proposed mitigation:	**Implement the proposed higher density development layout inclusive of the retail and creche component.**
Cumulative impact post mitigation:	**Medium-High Positive**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**MEDIUM-HIGH POSITIVE**

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

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

Potential visual impacts:	
Nature of impact:	**No Impact Anticipated**
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	

Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

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

7. SPECIALIST INPUTS/STUDIES AND RECOMMENDATIONS

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

Specialist inputs/studies and recommendations:

Several specialist inputs and studies were undertaken as part of the original EIA process which resulted in the EA issued in 2011. As part of the current EIA process only an updated Freshwater Ecological Assessment was undertaken (FEN, August 2026).

Aquatic Specialist Recommendations:

- Maintain the existing piping of the stormwater channel ("Wetland 7") and do not reinstate the open-channel sections.
- Consolidate the functional loss of aquatic habitat associated with the development into the existing wetland offset area (stormwater pond) south of Stinkwood Road.
- Compile and implement a Maintenance Management Plan (MMP) for the wetland offset area, subject to approval by DEA&DP.
- Incorporate the establishment of obligate and facultative hydrophytes within the stormwater pond to enhance aquatic habitat and ecosystem service provision.
- Undertake ongoing removal of excess sediment, debris and litter from the wetland offset area.

8. IMPACT ASSESSMENT SUMMARY

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

Impacts	Proposed Densified Development Layout (770 units) (Without Mitigation)	Proposed Densified Development Layout (770 units) (With Mitigation))
Planning Design and Construction Phase		
Alteration of physical site geography and drainage.	**LOW NEGATIVE**	**N/A – OFFSET RELEVANT**
Alteration and loss of aquatic habitat and ecological functioning associated with the piping of portions of Wetland 7 beyond the authorised extent.	**LOW NEGATIVE**	**N/A – OFFSET RELEVANT**

Potential indirect impact on Wetland 3 from increased development intensity.	**LOW NEGATIVE**	**N/A – NO IMPACT ANTICIPATED**
Temporary disturbance of the wetland offset area during rehabilitation* * While the long-term impacts of this phase are considered to be a nett positive, the active works thereof may result in disturbances to soil resulting in compaction and erosion, and water quality impacts due to movement of machinery and personnel within the area, but only during the active rehabilitation phase.	**LOW NEGATIVE**	**SHORT TERM: VERY LOW NEGATIVE** **LONG TERM: POSITIVE**
Temporary employment opportunities (direct and indirect) during construction	**MEDIUM POSITIVE**	**MEDIUM-HIGH POSITIVE**
Stimulation of the local economy and supply chain through the procurement of goods and services during construction.	**MEDIUM POSITIVE**	**MEDIUM-HIGH POSITIVE**
Potential noise nuisance of construction works on surrounding neighbours	**MEDIUM NEGATIVE**	**LOW NEGATIVE**
Dust generation during the construction phase	**LOW-MEDIUM NEGATIVE**	**LOW NEGATIVE**
Visual impacts during construction activities	**LOW NEGATIVE**	**LOW NEGATIVE**
Intensified use of access roads to facilitate construction potentially resulting in congestion.	**LOW NEGATIVE**	**LOW NEGATIVE**
Waste generation from construction activities – general construction waste.	**LOW NEGATIVE**	**LOW NEGATIVE**
Operational Phase		
Increased development intensity and associated hard surfaces may increase stormwater runoff within the existing development footprint.	**LOW-MEDIUM NEGATIVE**	**N/A – OFFSET RELEVANT**
Long-term management and maintenance of the designated Wetland 7 offset area	**LOW POSITIVE**	**LOW POSITIVE**
Increased number of social housing units developed and available for occupancy	**MEDIUM-HIGH POSITIVE**	**MEDIUM-HIGH POSITIVE**
Permanent job creation during operation of the retail component and creche	**MEDIUM POSITIVE**	**MEDIUM-HIGH POSITIVE**
Increased general residential noise associated with increased development density	**LOW NEGATIVE**	**NO IMPACT ANTICIPATED**
Potential visual impact as a result of a higher-density development	**LOW NEGATIVE**	**NO IMPACT ANTICIPATED**

Potential traffic related impacts during operation of the development	**LOW-MEDIUM NEGATIVE**	**LOW NEGATIVE**
Increased demand for service provision and resource usage	**LOW-MEDIUM NEGATIVE**	**LOW NEGATIVE**
Increased generation of domestic waste during the operational phase.	**LOW-MEDIUM NEGATIVE**	**LOW NEGATIVE**
Decommissioning and Closure (no-go on densification)		
Excavation and removal of existing stormwater infrastructure, resulting in soil disturbance, dust and noise	**MEDIUM NEGATIVE**	**LOW NEGATIVE**
Altering the established Wetland 7 stormwater system could disrupt drainage, increase flood risk and result in potential water quality impacts.	**MEDIUM NEGATIVE**	**SHORT TERM: VERY LOW NEGATIVE** **LONG TERM: POSITIVE**
Reduced provision of social housing units and employment opportunities	**MEDIUM NEGATIVE**	**MEDIUM-HIGH POSITIVE**

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

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

Summary:

The activity resulted in localised biodiversity impacts associated with the piping and infilling of portions of the feature historically identified as Wetland 7 beyond the extent authorised under the existing Environmental Authorisation. These impacts included the loss of the remaining open-channel habitat and associated changes to hydrological functioning and connectivity. However, the Freshwater Impact Assessment confirmed that Wetland 7 is an anthropogenic stormwater channel rather than a natural wetland, and that no natural freshwater ecosystems occur within the development footprint. The perceived loss of functional aquatic habitat was addressed through the wetland offset established as part of the 2015 Water Use Licence process, while the existing stormwater infrastructure maintains hydrological connectivity between the northern catchment and the wetland offset area. The implementation and ongoing management of the wetland offset through the applicable Maintenance Management Plan will further ensure that the affected aquatic ecosystem services are appropriately managed. Accordingly, there are no significant residual biodiversity impacts that remain unmitigated or unmanaged. The Freshwater Impact Assessment concludes that, although the proposed rehabilitation of the offset area may result in minor impacts during active rehabilitation, the long-term benefits of implementing the offset strategy, as defined in the Wetland Offset Report, are anticipated to result in a net positive long-term outcome.

10. OTHER MANAGEMENT, MITIGATION AND MONITORING MEASURES

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

- A detailed EMPr has been developed that incorporates all specialists' recommendations together with additional relevant mitigation and management measures to ensure effective long-term environmental management of the site and the associated wetland offset.

- All mitigation and management measures as outlined in relevant specialist reports as well as technical report prepared for the proposed development must be complied with.

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

The transgressor is not the applicant. The applicant and transgressor, both experienced developers, are willing and able to implement the management, monitoring and mitigation measures as prescribed by the EAP in this document and the accompanying EMP. While these measures represent an additional project cost, the applicant acknowledges that they are necessary to facilitate the proposed social housing development and will ensure that sufficient resources are made available for their implementation and ongoing compliance. The proposed social housing development is supported by the City of Cape Town, the Western Cape Department of Infrastructure and the Social Housing Regulatory Authority (SHRA) (Appendix N)

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

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

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

Assessment methods used include the following:

- Site visits to determine the current nature and sensitivity of the site and the surrounding environment.
- Consulting with the Applicant & to gain an understanding of the need for the proposed activity.
- Consultation with previous property developer to understand project background.
- Consultation with DEA&DP to understand previous applications and context.
- Consideration of the applicable Legislation, Guidelines and Policies.
- Consideration of the district and provincial IDPs, SDFs in order to understand the socio-economic context of the proposed development.
- Obtaining specialist updated aquatic input.
- Undertaking quantitative impact assessment.

It is the opinion of the EAP that the assessment methods used were adequate. However, the EAP is of the opinion that based on the findings of the freshwater ecologist that the piping was not done in a water course but rather a water resource therefore questioning the DEA&DP determined unlawfulness of the case. The EAP is of the opinion that authorisation was not required ito NEMA for the piping. The deviation from the existing EA is insignificant and administrative in nature, not posing an increased level or change to the nature of impacts already assessed as part of the current EA, therefore a Part 1 amendment process can be applied to this case.

(b) Please describe the **assessment criteria** used.

Impact rating methodology

The significance of each impact identified was assessed according to the following variables (evaluation components): ***Significance*** is the product of ***probability and severity***.

Probability describes the likelihood of the impact actually occurring, and is rated as follows:

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

The **severity factor** is calculated from the factors given to "**intensity" and "duration**". Intensity and duration factors are awarded to each impact, as described below.

The **intensity factor** is awarded to each impact according to the following method:

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

Duration is assessed and a factor awarded in accordance with the following:

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

The **severity rating** is obtained from calculating a severity factor and comparing the severity factor to the rating in the table below. For example:

The severity factor = intensity factor x duration factor

= 2 x 3

= 6

A **severity factor** of six (6) equals a severity rating of medium severity (rating 3) as per table below:

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

SEVERITY FACTORS BELOW 3 INDICATE NO IMPACT

A significance rating is calculated by multiplying the severity rating with the probability rating.

The **significance rating** should influence the development project as described below:

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

The impacts were assessed for the preferred and alternative and for the "no - go" option, with and without the implementation of proposed mitigation measures.

Cumulative impact: in relation to an activity, means the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity that in itself may not be significant, but may become significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities.

(c) Please describe the **gaps in knowledge**.

While not all historical application documents and monitoring reports were available to inform this assessment, sufficient information was available to assess the unauthorised activities and the proposed development. The application is supported by a current freshwater ecological assessment, historical environmental records, engineering information and planning documentation. No material gaps in knowledge have been identified that would affect the findings or recommendations of this Section 24G application. Should any additional relevant information become available, it will be communicated to the competent authority in an open and transparent manner. However, the EAP is of the opinion that based on the findings of the freshwater ecologist that the piping was not done in a watercourse but rather a water resource therefore questioning the DEA&DP determined unlawfulness of the case. The EAP is of the opinion that authorisation was not required ito NEMA for the piping. The deviation from the existing EA is insignificant and administrative in nature, not posing an increased level or change to the nature of impacts already assessed as part of the current EA, therefore a Part 1 amendment process can be applied to this case.

(d) Please describe the **underlying assumptions**.

The following assumptions apply to the current application:

- It is assumed that all information on which this report is based is both correct and truthful and without omission.
- It Is assumed that comprehensive specialist assessments were undertaken.
- It is assumed that all impacts associated with the development activities have been identified.
- It is assumed that all relevant mitigation measures specified in this report will be fully implemented and complied with on a long-term basis, in order to ensure that the impact on the surrounding environment is minimized, to an acceptable level.

The following assumptions and limitations apply to the 2026 Freshwater Impact Assessment:

- The freshwater ecosystem verification is confined to the study area (Erven 3303 and 3304) and the associated 500 m investigation area and does not include the surrounding properties outside of the investigation area. The general surroundings were, however considered in the desktop assessment of the investigation area;
- All freshwater ecosystems identified within the investigation area were delineated as far as possible using desktop methods including the use of topographic maps and data, historical and current digital satellite imagery;
- Global Positioning System (GPS) technology is subject to a minor level of inaccuracies due to the use of handheld GPS instrumentation that may potentially lead to small discrepancies in the mapping of the features. Notwithstanding this, and the points above, the delineations are considered adequate for the purposes of informing the S24G Rectification Process
- At the interface between freshwater ecosystems and terrestrial zones there is a transitional area where an ecotone is formed as vegetation species community structures change from terrestrial to wetland facultative species through to wetland obligate species. Within this transition zone, some variation of opinion on the watercourse boundaries may occur. However, if the DWAF (2008) method is followed, all assessors should get largely similar results; and
- With ecology being dynamic and complex, certain aspects (some of which may be important) may have been overlooked. However, it is expected that the watercourses have been accurately assessed and considered, based on the field observations and the consideration of existing studies and monitoring data in terms of riparian and wetland ecology.

(e) Please describe the **uncertainties**.

Please refer to section (d) above for limitations encountered within the specialist reports.

SECTION H: RECOMMENDATIONS OF THE EAP

In my view (EAP), the information contained in the Application and the documentation attached hereto is sufficient to make a decision in respect of the activity applied for. The EAP is of the opinion that based on the findings of the freshwater ecologist that the piping was not done in a watercourse but rather a water resource therefore questioning the DEA&DP determined unlawfulness of the case. The EAP is of the opinion that authorisation was not required ito NEMA for the piping. The deviation from the existing EA is insignificant and administrative in nature, not posing an increased level or change to the nature of impacts already assessed as part of the current EA, therefore a Part 1 amendment process can be applied to this case.	**YES X** **Note as per insert**	NO

If "NO", list the aspects that should be further assessed through additional specialist input/assessment:		
If "YES", please indicate below whether in your opinion the applicant should be directed to cease the activity or if it should be authorised:		
Applicant should be directed to cease the activity:	YES	**NO X**
Please provide reasons for your opinion		
The unauthorised piping of Wetland 7 has already been completed and forms part of the City's stormwater network. Reinstating the historical stormwater channel is neither technically feasible nor environmentally appropriate, as it would compromise the functioning of the stormwater system, increase flood risk and disturb an established drainage network (Refer Appendix H9.2 and Appendix H1). The application is supported by a current freshwater ecological assessment, which concluded that the affected feature was an artificial stormwater channel. The long-term management of the established wetland offset associated with wetland 7 through the Maintenance Management Plan will provide a more appropriate and sustainable environmental outcome than attempting to rehabilitate the piped sections. The proposed City-approved densified social housing development also responds to a demonstrated need for affordable housing while making efficient use of existing urban land and infrastructure. The proposed social housing development is supported by the City of Cape Town, the Western Cape Department of Infrastructure and the Social Housing Regulatory Authority (SHRA) (Appendix N). The deviation from the existing EA is insignificant and administrative in nature, not posing an increased level or change to the nature of impacts already assessed as part of the current EA, therefore a Part 1 amendment process can be applied to this case. Subject to the implementation of the Environmental Management Programme, Wetland Offset and Maintenance Management Plan and proposed mitigation measures, the development is considered environmentally acceptable and should be authorised.		
If you are of the opinion that the activity should be authorised, then please provide any conditions, including mitigation measures that should in your view be considered for inclusion in an authorisation.		
- The EMPr (Appendix I) should be implemented in full. - The Wetland Offset as compiled in 2015 (Appendix H3) must be implemented in full - The MMP (Appendix H4) should be implemented in full. - No Alien Invasive vegetation may be used as part of onsite landscaping. - Ongoing clearing and management of Alien Invasive vegetation must be implemented onsite. - The developer shall remain responsible for implementing and complying with all conditions of the Environmental Authorisation, Environmental Management Programme (EMPr) and applicable provisions of the Maintenance Management Plan (MMP), including the long-term management and maintenance of the Wetland 7 offset. The transfer of ownership or occupation of individual residential units or portions of the development shall not transfer or diminish these environmental responsibilities. The developer shall ensure that appropriate legal and management mechanisms are established to secure ongoing compliance with the Environmental Authorisation, EMPr and MMP for the duration of the development.		

SECTION I: REPRESENTATIONS – RESPONSE TO AN INCIDENT OR EMERGENCY SITUATION (IF APPLICABLE)

This section is only applicable to instances where Section 49A (2) of NEMA applies. Please list all steps that where taken in response to the incident or emergency situation.
N/A

Please note:

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

DECLARATION

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I Paul Slabbert EAPASA Registration number 2019/1036 as the appointed EAP hereby declare/affirm the correctness of the information provided or to be provided as part of this application, and that:

- in terms of the general requirement to be independent:
  - other than fair remuneration for work performed/to be performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
  - ~~am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);~~

- in terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;

- I have disclosed/will disclose, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;

- I have ensured/will ensure that information containing all relevant facts in respect of the application was/will be distributed or was/will be made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were/will be provided with a reasonable opportunity to participate and to provide comments;

- I have ensured/will ensure that the comments of all interested and affected parties were/will be considered, recorded, responded to and submitted to the Competent Authority in respect of this application;

- I have ensured/will ensure the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;

- I have kept/will keep a register of all interested and affected parties that participated in the public participation process;

- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;



30/09/2026

Signature of the EAP: Date:

Name of company: PHS Consulting

Department of Environmental Affairs & Development Planning

Directorate: Environmental Governance

www.westerncape.gov.za/eadp

Western Cape Government