October 2026

DEADP Ref: 16/3/3/6/7/1/E2/10/1484/25

Document Version: Statutory

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

BASIC ASSESSMENT REPORT

THE PROPOSED DEVELOPMENT ON PORTION 40 OF FARM 711, KLIP FONTEYN, GANSBAAI



EAP Responsible for the application:

Jenna Theron (EAP) - EAPASA Reg. No. 2022/5926

Josie Howard (Candidate EAP) - EAPASA Reg. No. 2025/19917

Contact Details: Tel: 028 312 1734 | Cell: 082 740 8046 | josie@phsconsulting.co.za

Postal Address: PO Box 1752, Hermanus, 7200

Western Cape Government

Department of Environmental Affairs and Development Planning

BASIC ASSESSMENT REPORT

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

APRIL 2024

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APRIL 2024

(For official use only)	
Pre-application Reference Number (if applicable):	16/3/3/6/7/1/E2/10/1484/25
EIA Application Reference Number:	
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

GENERAL PROJECT DESCRIPTION

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

Danger Point Ecological Development Company (Pty) Ltd has appointed PHS Consulting as an Independent Environmental Assessment Practitioner (EAP), to undertake a Basic Assessment for the proposed rezoning, subdivision & subsequent residential development on Portion 40 of Farm 711, Klip Fonteyn, located approximately 4km S-SW of Gansbaai, in the Overberg District. The greater property comprises an area of 6.62 ha in total, however, application will only be made for a newly subdivided portion which covers 3.32ha in extent.

The site is situated adjacent to the Romansbaai Beach & Fynbos Estate, close to Danger Point. The proposed site is situated in a predominantly mixed-use area consisting of residential developments, natural vegetation, tourist related uses and abalone farms.

The site is currently used for residential purposes. A manor house with associated outbuildings such as a helicopter hangar, an additional dwelling, a borehole and small solar power generation plant are established on the subject farm portion. Land uses that surround Portion 40 of Farm 711 are residential dwellings, natural vegetation, private open spaces, tourist related businesses, public and private roads, abalone farms and utility uses. It is therefore evident that the site is situated within a mixed-use area of which the predominant use is residential. The site is inside the Urban Edge of the Overstand Municipal Spatial Development Framework.

It is the intention of the Applicant to rezone and subdivide the subject property as follows:

- 6 Residential Erven (±750m² each)

- Private Road (±3 313m²)
- Private Open Space (POS) Zone (±20 733m²)
- Utility Services Zone (±1039m²)
- Conservation Zone (±35 389m²)

The Conservation Zone will be the property to the north, on the coastal side, on which the existing dwelling and infrastructure is located and will not undergo any changes. The remaining area to the south will form the residential estate with 6 dwellings, a road, an existing utility services area and Private Open Space in order to create a residential development to be integrated into the Romansbaai Beach & Fynbos Estate.

Therefore, no further development will take place in the POS or Conservation Zone. The Utility Services zone already exists but will be formalised. Vegetation clearance will be undertaken for the construction of the dwellings within the 6 residential erven and the Private Road required. Therefore, a footprint of ±7813m^2 is required (6 x dwellings, plus road), with a maximum footprint of ±9766m^2 required which includes a construction buffer.

The new private road will also be accessed via the internal road infrastructure of the Romansbaai Beach & Fynbos Estate and an access servitude from an existing cul-de- sac. The private road will be 3.5m wide and have a road reserve width of 8m that will provide access to the development. The proposed rezoning, subdivision and subsequent development can be interpreted as an extension of the existing Romansbaai Beach & Fynbos Estate.

The proposed 6 additional single residential erven will link with the existing services infrastructure of the Romansbaai Beach and Fynbos Estate development. According to the Romansbaai Beach and Fynbos Estate, there is sufficient municipal services capacity to provide the proposed 6 residential erven with the required services such as water, sewage, electricity and refuse removal, given that they abide to the conditions as set out by the Overstrand Municipality regarding Bulk Services Contribution Levies (BSCL).

A borehole and small solar plant exist in the south-eastern corner of the property and are utilised by the existing buildings on site (located in the future Conservation Zone). It has been decided to formalise the uses with the rezoning of an area of ±1 039m² in extent, labelled as 'Utility Services'. It is anticipated that electricity generated by the solar plant will be used to supplement municipal electricity for the dwellings on site. Further confirmation of Municipal service capacity will be obtained and provided as part of the NEMA process.

Please refer to Figures 1-2 below for maps pertaining to the proposed development.

NOTE: ALL CHANGES MADE TO THE BAR AFTER THE PRE-APPLICATION PPP ARE BLUE AND UNDERLINED

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

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

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

3. *Submission of documentation, reports and other correspondence:*

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

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

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

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

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

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

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

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

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

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

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

9. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.

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

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

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

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

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

15. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA"), the submission of the Report must also be made as follows, for-
Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

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

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

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map: (**Appendix A**)	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	
Site Plan:	Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following: • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. • The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. • The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development **must** be clearly indicated on the site plan. • Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. • Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): o Watercourses / Rivers / Wetlands o Flood lines (*i.e.,* 1:100 year, 1:50 year and 1:10 year where applicable); o Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): o Ridges; o Cultural and historical features/landscapes; o Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as **Appendix C**. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as **Appendix D**.

Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as **Appendix A3**.

ACRONYMS

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

ATTACHMENTS

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

The following checklist of attachments must be completed.

APPENDIX			**✓ (Tick) or x (cross)**
Appendix A:	**Maps**		
	Appendix A1:	**Locality Map**	✓
	Appendix A2:	**Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning**	✓
	Appendix A3:	**Map with the GPS co-ordinates for linear activities**	**N/A**
Appendix B:	**Appendix B1:**	**Site development plan(s)**	✓
	Appendix B2	**A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;**	✓
Appendix C:	**Photographs**		✓
Appendix D:	**Biodiversity overlay map**		✓
Appendix E:	**Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.**		
	Appendix E1:	**Final comment/ROD from HWC**	**Awaiting Final Comment**
	Appendix E2:	**Copy of comment from Cape Nature**	✓
	Appendix E3:	**Final Comment from the DWS**	**N/A**
	Appendix E4:	**Comment from the DEA: Oceans and Coast**	**N/A**
	Appendix E5:	**Comment from the DAFF**	**Awaiting**
	Appendix E6:	**Comment from WCG: Transport and Public Works**	**N/A**
	Appendix E7:	**Comment from WCG: DoA**	**Awaiting**
	Appendix E8:	**Comment from WCG: DHS**	**N/A**
	Appendix E9:	**Comment from WCG: DoH**	**N/A**
	Appendix E10:	**Comment from DEA&DP: Pollution Management**	**N/A**

	Appendix E11:	**Comment from DEA&DP: Waste Management**	**N/A**
	Appendix E12:	**Comment from DEA&DP: Biodiversity**	**Awaiting**
	Appendix E13:	**Comment from DEA&DP: Air Quality**	**N/A**
	Appendix E14:	**Comment from DEA&DP: Coastal Management**	✓
	Appendix E15:	**Comment from the local authority**	✓
	Appendix E16_1:	**Confirmation of all services (water, electricity, sewage, solid waste management) Municipal Service Capacity Report**	✓
	Appendix E16_2:	**Civil Engineering Services Report**	✓
	Appendix E17:	**Comment from the District Municipality**	✓
	Appendix E18:	**Copy of an exemption notice**	**N/A**
	Appendix E19	**Pre-approval for the reclamation of land**	**N/A**
	Appendix E20:	**Proof of agreement/TOR of the specialist studies conducted.**	**N/A**
	Appendix E21:	**Proof of land use rights**	✓
	Appendix E22:	**Proof of public participation agreement for linear activities**	**N/A**
Appendix F:	**Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.**		
	Appendix F1:	**List of Interested and Affected Parties**	✓
	Appendix F2:	**Proof of PPP**	✓
	Appendix F3:	**Comments and Response Report**	✓
	Appendix F4:	**Comments Received**	✓
Appendix G:	**Specialist Report(s)**		
	Appendix G1:	**Botanical Impact Assessment**	✓
	Appendix G2:	**Faunal Site Sensitivity Report**	✓
	Appendix G3:	**Heritage Impact Assessment**	✓
Appendix H:	**EMPr**		✓
Appendix I:	**Screening tool report and Site Sensitivity Verification Report**		✓

Appendix J:	**The impact and risk assessment for each alternative**	✓
Appendix K:	**Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline**	✓
Appendix L:	**Town Planning Report**	✓

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE: REGION 1		GEORGE OFFICE: BEGION 3
	(City of Cape Town, West Coast District	**(Cape Winelands District & Overberg District)**	(Central Karoo District & Garden Route District)

Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	Danger Point Ecological Development Co (Pty)Ltd	
Name of contact person for Applicant/Proponent (if other):	David Mostert	
Company/ Trading name/State Department/Organ of State:	Danger Point Ecological Development Co (Pty)Ltd	
Company Registration Number:	200202248607	
Postal address:	11092 Steenberg Estate	
	Tokai	Postal code: 7945
Telephone:	082 908 8888	Cell: 082 908 8888
E-mail:	david@mosterts.co.za	Fax:
Company of EAP:	Fynbosland 323 CC t/a PHS Consulting	
EAP name:	Jenna Theron (EAP) Josie Howard (Candidate EAP)	
Postal address:	PO BOX 1752	
	Hermanus	Postal code: 7200
Telephone:	028 312 1734	Cell: 082 740 8046
E-mail:	jt@phsconsulting.co.za / josie@phsconsulting.co.za	Fax:
Qualifications:	Jenna Theron: BA, MPhil Josie Howard: MSc Plant Science	
EAP registration no:	Jenna Theron (2022/5926) Josie Howard (2025/19917)	
Duplicate this section where there is more than one landowner Name of landowner:	Danger Point Ecological Development Co (Pty)Ltd	
Name of contact person for landowner (if other):	David Mostert	
Postal address:	11092 Steenberg Estate	
	Tokai	Postal code: 7945
Telephone:	082 908 8888	Cell: 082 908 8888
E-mail:	david@mosterts.co.za	Fax:
Name of Person in control of the land:	David Mostert	
Name of contact person for person in control of the land:	David Mostert	
Postal address:	11092 Steenberg Estate	
	Tokai	Postal code: 7945
Telephone:	082 908 8888	Cell: 082 908 8888
E-mail:	david@mosterts.co.za	Fax:

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	Overstrand Municipality	
Contact person:	Liezl de Villiers	
Postal address:	Cnr Molteno & Viljoen St, Onrus	
	Hermanus	Postal code: 7200
Telephone	028 313 5615	Cell:
E-mail:	ldevilliers@overstrand.gov.za	Fax:

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

1.	Is the proposed development (please tick):	**New**	**X**	**Expansion**	**X**
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				
The subject farm Portion (Portion 40 of Farm 711) is considered partially a "brownfield" site as it has been subject to development and contains a certain level of existing infrastructure.					
3.	**For Linear activities or developments N/A**				
~~3.1.~~	~~Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:~~				
~~3.2.~~	~~Development footprint of the proposed development for all alternatives.~~	~~m²~~			
~~3.3.~~	~~Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.~~				
~~3.4.~~	~~Indicate how access to the proposed routes will be obtained for all alternatives.~~				
~~3.5.~~	~~SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives~~				
~~3.6.~~	~~**Starting point co-ordinates for all alternatives**~~				
	~~Latitude (S)~~	~~º~~	~~'~~	~~"~~	
	~~Longitude (E)~~	~~º~~	~~'~~	~~"~~	
	~~**Middle-point co-ordinates for all alternatives**~~				
	~~Latitude (S)~~	~~º~~	~~'~~	~~"~~	
	~~Longitude (E)~~	~~º~~	~~'~~	~~"~~	
	~~**End point co-ordinates for all alternatives**~~				
	~~Latitude (S)~~	~~º~~	~~'~~	~~"~~	
	~~Longitude (E)~~	~~º~~	~~'~~	~~"~~	
~~**Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.**~~					
4.	**Other developments**				
4.1.	Property size(s) of all proposed site(s):				66 200 m²
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):				±5 500 m²
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:				±9766m²
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).				

Danger Point Ecological Development Company (Pty) Ltd has appointed PHS Consulting as an Independent Environmental Assessment Practitioner (EAP), to undertake a Basic Assessment for the proposed rezoning, subdivision & subsequent residential development on Portion 40 of Farm 711, Klip Fonteyn, located approximately 4km S-SW of Gansbaai, in the Overberg District. The greater property comprises an area of 6.62 ha in total, however, application will only be made for a newly subdivided portion which covers 3.32ha in extent.

The site is situated adjacent to the Romansbaai Beach & Fynbos Estate, with Portion 40 of Farm 711 currently being used for residential purposes. A manor house with associated outbuildings such as a helicopter hangar, boat shed, an additional dwelling, a borehole and small solar power generation plant are established on the subject farm portion.

It is the intention of the Applicant to rezone and subdivide the subject property as follows:

- 6 Residential Erven (±750m² each)
- Private Road (±3 313m²)
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- Conservation Zone (±35 389m²)

The Conservation Zone will be the property to the north, on the coastal side, on which the existing dwelling and infrastructure is located and will not undergo any changes. The remaining area to the south will form the residential estate with 6 dwellings, a road, an existing utility services area and Private Open Space in order to create a residential development to be integrated into the Romansbaai Beach & Fynbos Estate.

Therefore, no further development will take place in the POS or Conservation Zone. The Utility Services zone already exists but will be formalised. Vegetation clearance will be undertaken for the construction of the dwellings within the 6 residential erven and the Private Road required. Therefore, a footprint of ±7813m^2 is required (6 x dwellings, plus road), with a maximum footprint of ±9766m^2 required which includes a construction buffer.

The new private road will also be accessed via the internal road infrastructure of the Romansbaai Beach & Fynbos Estate and an access servitude from an existing cul-de- sac. The private road will be 3.5m wide and have a road reserve width of 8m that will provide access to the development. The proposed rezoning, subdivision and subsequent development can be interpreted as an extension of the existing Romansbaai Beach & Fynbos Estate.

The proposed 6 additional single residential erven will link with the existing services infrastructure of the Romansbaai Beach and Fynbos Estate development. According to the Romansbaai Beach and Fynbos Estate, there is sufficient municipal services capacity to provide the proposed 6 residential erven with the required services such as water, sewage, electricity and refuse removal, given that they abide to the conditions as set out by the Overstrand Municipality regarding Bulk Services Contribution Levies (BSCL).

A borehole and small solar plant exist in the south-eastern corner of the property and are utilised by the existing buildings on site (located in the future Conservation Zone). It has been decided to formalise the uses with the rezoning of an area of ±1 039m² in extent, labelled as 'Utility Services'. It is anticipated that electricity generated by the solar plant will be used to supplement municipal electricity for the dwellings on site. Further confirmation of Municipal service capacity will be obtained and provided as part of the NEMA process.

Please refer to Figures 1-2 for maps pertaining to the proposed development.



Figure 1: Locality of the proposed development. Property is outlined in yellow.

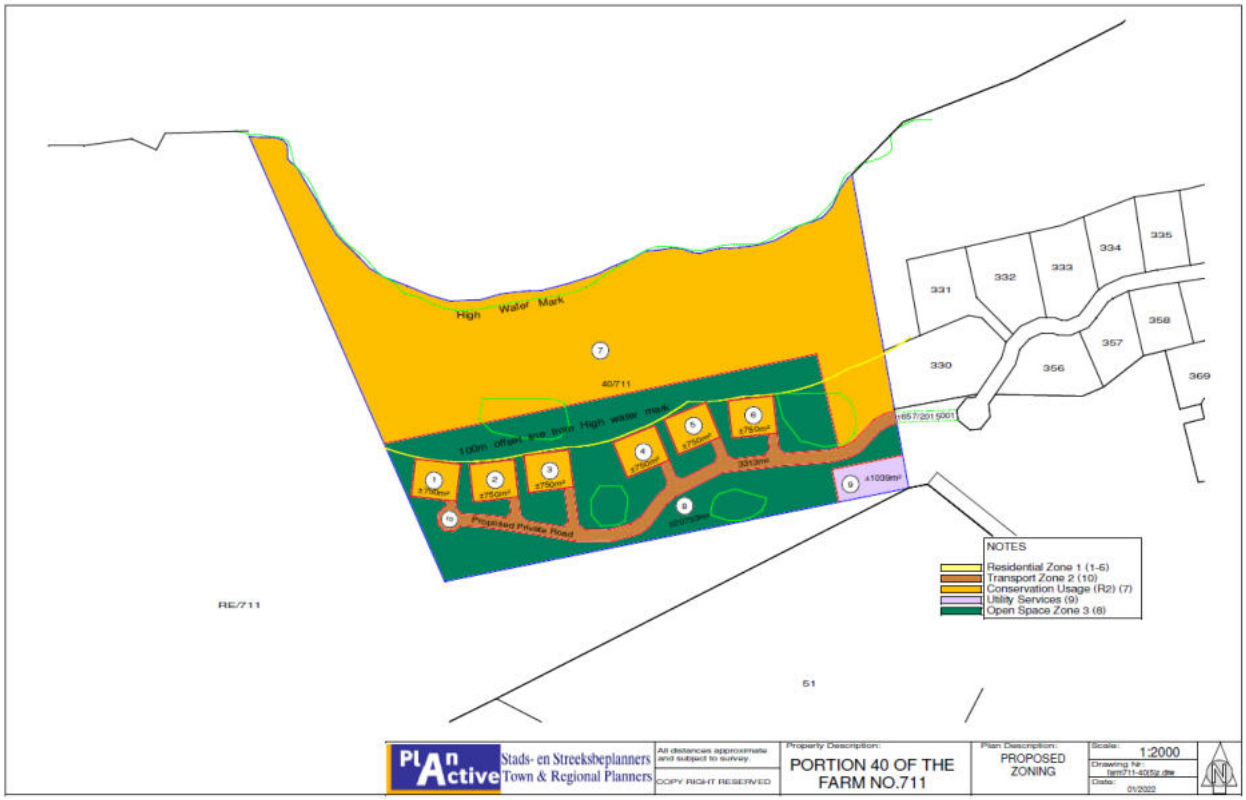


Figure 2: Proposed preferred layout of the residential development.

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

The new private road will also be accessed via the internal road infrastructure of the Romansbaai Beach & Fynbos Estate and an access servitude from an existing cul-de- sac. The private road will be 3.5m wide and have a road reserve width of 8m that will provide access to the development. The proposed rezoning, subdivision and subsequent development can be interpreted as an extension of the existing Romansbaai Beach & Fynbos Estate.

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	1	3	0	0	0	0	0	0	0	0	0	7	1	1	0	0	0	4	0

4.7.	Coordinates of the proposed site(s) for all alternatives:			
	Latitude (S)	34°	36′	45.39″
	Longitude (E)	19°	19′	27.99″

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

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

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

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

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.	YES	**NO**
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.	**YES**	NO
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3.	YES	**NO**
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	YES	**NO**
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")	YES	**NO**
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	YES	**NO**
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	YES	**NO**
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.	YES	**NO**

3. Other legislation

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

4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.
The following policies were considered: **Overstrand IDF: Towards 2050 - Draft Strategic Environmental Management Framework** The Overstrand draft Environmental Management Framework (EMF) is an environmental planning tool that identifies where land uses are most compatible or incompatible with environmental opportunities and constraints. Key recommendations relevant to the proposed development include: • **Natural habitats**: Fragmentation of continuous natural areas should be avoided. Decisions affecting pristine or threatened (critically endangered, endangered, or vulnerable) ecosystems should be informed by specialist biodiversity assessments and should consider • **Endangered and critically endangered ecosystems**: Prevent further habitat loss or degradation. Activities that do not disrupt ecosystem functioning or further disturb the natural environment are considered appropriate in these systems. In line with these requirements, the original development plan was edited after the Botanical, Faunal and Heritage Impact Assessments were conducted. The changes made to the development plan were done to further minimise environmental impacts and avoid "no-go" areas (as determined by the Botanical specialist). Additionally, the development plan includes a 2ha private open space zone and a 3.5ha conservation zone thus contributing to the protection and sustainable management of the natural habitat on the property.

The development can be seen as an extension of the existing Romansbaai Beach Estate and therefore will not be a significant change to the landscape.
The development is consistent with the Overstrand EMF because it:

- Minimises loss of high sensitivity habitat
- Is expected to have a low visual impact
- Incorporates conservation actions that will enhance long-term ecological health and aesthetic value

Overstrand Municipality Environmental Management Overlay Zones

The Overstrand Municipality Environmental Management Overlay Zone (EMOZ) Regulations 2020 aims to provide a mechanism though which the Council can issue and apply specific guidelines in terms of spatial development. The Overstrand Municipality EMOZ Regulations define 5 specific environmental management overlay zones:

1. Coastal Protection Environmental Management Overlay Zone
2. Mountain Catchment Environmental Management Overlay Zone
3. Protected Area Buffer Environmental Management Overlay Zone
4. Riverine Environmental Management Overlay Zone
5. Urban Conservation Environmental Management Overlay Zone

The proposed residential development falls within the Coastal Protection EMOZ. Schedule A of the Overstrand Municipality EMOZ regulations outlines prohibited activities within overlay zones while Schedule B outlines activities that require council permission and Schedule C outlines general regulations that must be considered within all 5 overlay zones. The proposed development does not trigger any prohibited activities; however, the following activities require council consent: Construction or placement of any permanent object, building, shelter, pathway or structure and Removal or destruction of vegetation which is protected and/or of conservation concern.

The proposed development activities aim to align with the general regulations outlined for EMOZs. An Environmental Management Plan (EMPr) which covers the planning and design, construction and operation phase of the development will be developed. The EMPr will outline measures to minimise negative impacts on the sensitive natural ecosystems including recommendations for the appropriate management of the private open space and conservation zones within the development.

Overstand Municipality SDF 2020

The Overstrand Municipal Spatial Development Framework (SDF) aims to promote the conservation of the natural environment in which Romansbaai is located and build the tourism industry based on the ecological and heritage value of the region. The proposed Romansbaai development falls within the Gaansbaai urban edge (Figure 3) the development plan still takes into account sensitive vegetation and habitat. The layout of the development is such that it avoids the high sensitivity vegetation, as delineated by the Botanical Specialist (See appendix G1 and Figure 5). The development also includes a conservation area and private open spaces with intentions to maintain the indigenous vegetation in the most ecologically sound way possible.

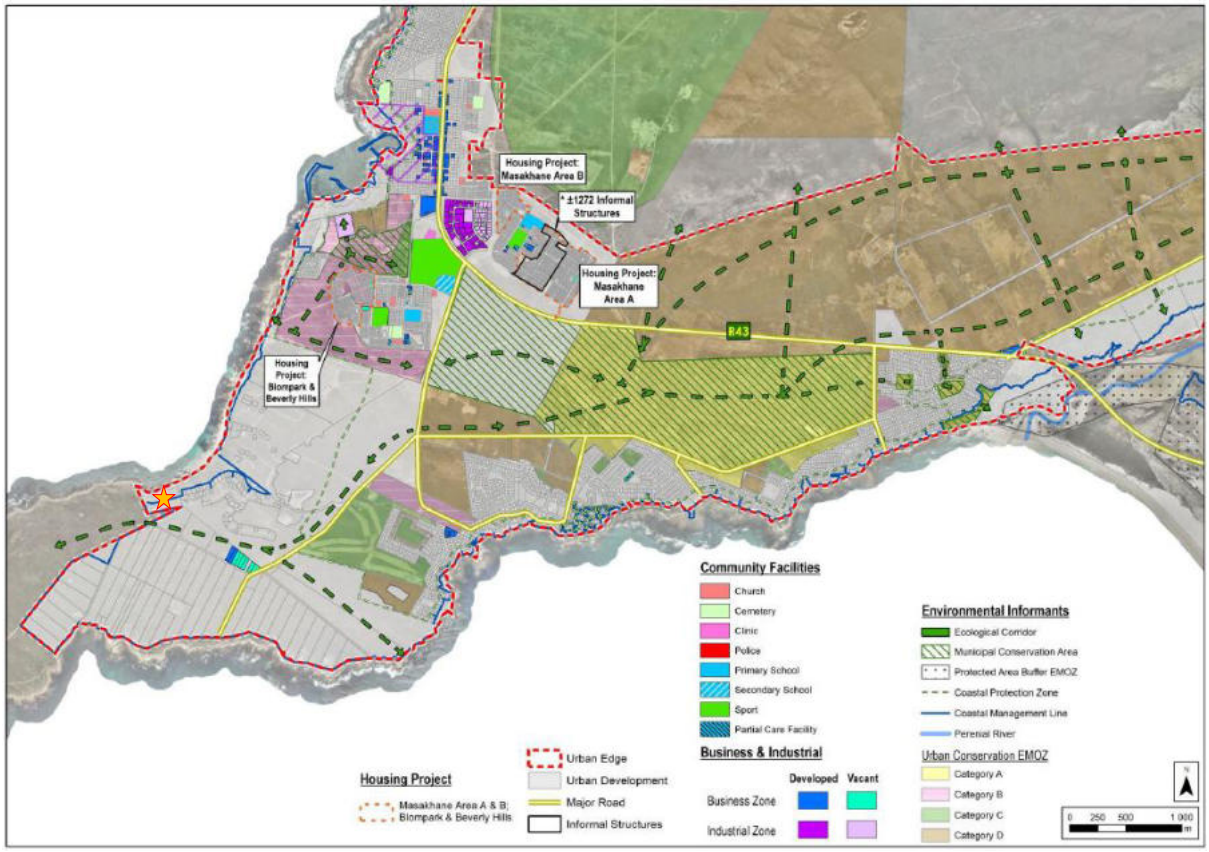


Figure 3: Extract from the Overstrand SDF showing the urban edge of the area. The location of the site is indicated by the star.

Overstrand IDP 2022 – 2027

The Overstrand Integrated Development Plan (IDP) highlights the importance of biodiversity conservation within its management region and the goal of finding the right match between protecting natural and cultural resources (i.e., preventing their loss or degradation), whilst addressing the need for development. The proposed residential development falls within the Endangered Overberg Dune Strandveld vegetation type and will result in some loss of habitat but still incorporates the vegetation into its planning, the conservation zone and open spaces. Additionally, the site plan has been adapted to avoid the areas of high sensitivity habitat (see Botanical Specialist Report, Appendix G1).

Overberg Coastal Management Framework

This Framework outlines the "regulation of development in the coastal zones (landward, within municipal boundaries, e.g. in terms of by-laws and planning relating to High Water Mark, Coastal Protection Zones & Coastal management Lines)" as a key area in marine and coastal management that require local government to be involved and to serve a governing/regulatory function to ensure sustainable development. The proposed additional 6 residential erven, private road, private open space and utilities erf are located outside the Coastal Management Line and Sensitive Development Areas. The proposed land use changes are all above the 100m setback (offset line as per plan) line from the high-water mark. The area below the 100m setback line to the high-water mark is privately developed but no land use changes are proposed within this area. Based on the above, the development aligns with the Overberg Coastal Management Framework.

Western Cape Biodiversity Spatial Plan (2023)

The Western Cape Biodiversity Spatial Plan (WCBSP) (2023) aims to guide sustainable development by providing a synthesis of biodiversity information to decision-makers. The main map categories are Critical Biodiversity Areas (Terrestrial and Aquatic), Ecological Support Areas (Critical and Other), Other Natural Remaining Areas and No Natural Remaining Areas. The first two mentioned categories represent the biodiversity priority areas which should be maintained in a natural to near-natural state. The last two mentioned categories are not considered as priority areas and a loss of biodiversity within these areas may be acceptable. The site of the proposed development is over a CBA: Terrestrial – Threatened Ecosystem; and therefore, the objective of this area is to maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate. However, the area does fall within the urban edge of Gansbaai and will contribute to the conservation of the threatened ecosystem by establishing a conservation zone on the property.

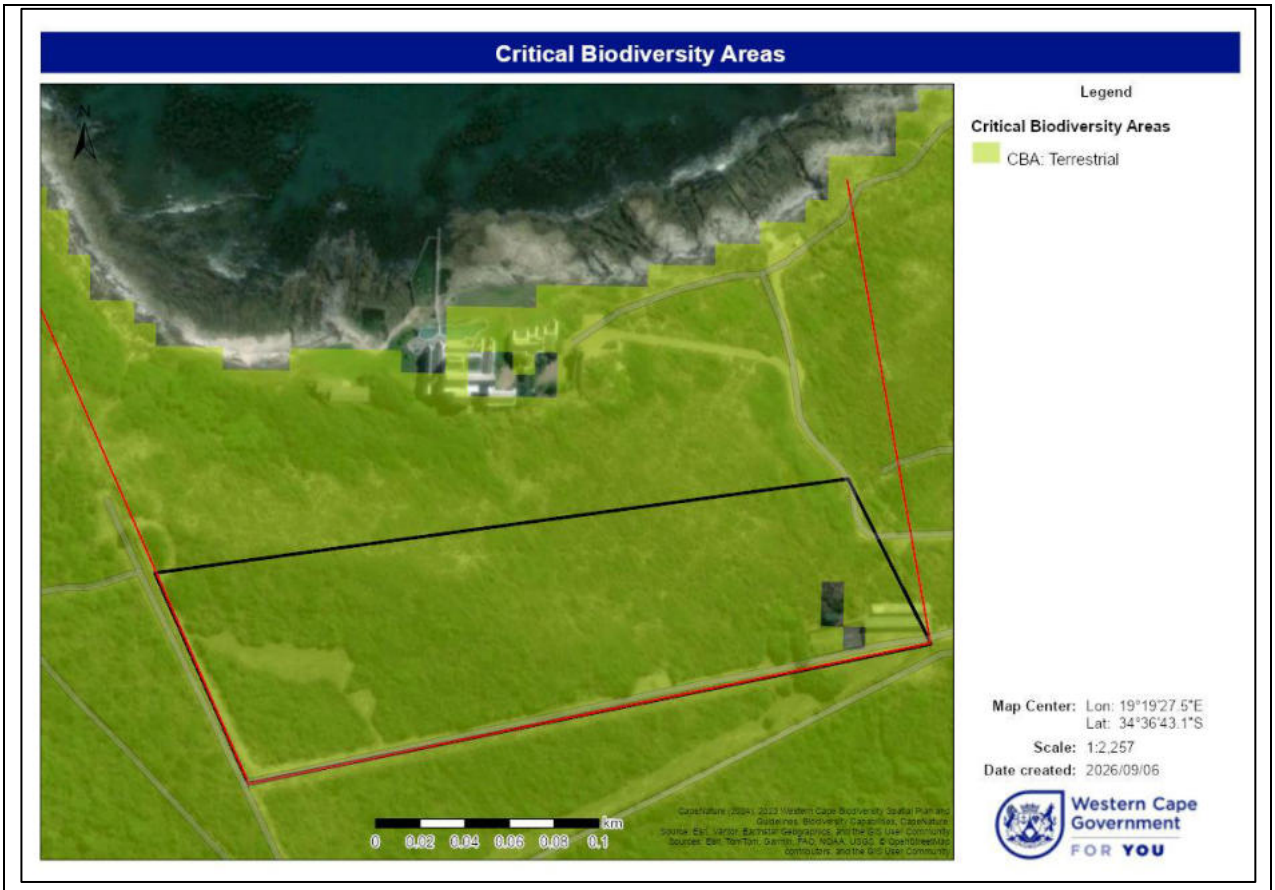


Figure 4: Map showing the delineated Critical Biodiversity Area in relation to the property (red outline) and the general site area (black outline).

Western Cape Provincial Spatial Development Framework (PSDF) (2014)

The PSDF outlines the following key transitions to ensure sustainable settlement developments:

- Transition from an Emphasis on 'greenfields' development and low-density sprawl to Emphasis on 'brownfields' development.
- Transition from Segregated land use activities to Integration of complementary land uses.

Furthermore, the PSDF also promotes "compact, mixed-use & integrated settlements as a provincial spatial policy" (1) as well "promote sustainable, integrated and inclusive housing in formal and informal markets" (2). This includes inter alia the following policies:

- Municipal SDFs to include growth management tools to achieve SPLUMA's spatial principles. These could include: a densification strategy and targets appropriate to the settlement context; an urban edge to protect agricultural land of high potential and contain settlement footprints; and a set of development incentives to promote integration, higher densities and appropriate development typologies.
- (2) Provide households with the residential environments, mobility and access to opportunities that support productive activities and reduce levels of exclusion from opportunity.
- (2) Increase densities of settlements and dwelling units in new housing projects.

Based on the above, it is deemed that the proposed development will align with the PSDF as the development will make use of a "brownfield site", result in increased densification on the property as well as within the demarcated urban edge, will result in the integration of complementary land uses and will promote integration of higher densities and appropriate development typologies.

5. Guidelines

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal.
The following guidelines were considered: • Guidelines for EMP's (June 2015) - Ensures that all the management actions identified throughout the EIA process are clearly outlined and implemented throughout the construction, operation, and decommissioning phases of a project. • Guidelines on Alternatives (March 2013)- Ensures that alternative design, layout, site or technology in terms of the proposed project is assessed as well as the no go option. • Circular EADP 0028/2014: One Environmental Management System - Ensures that the process under NEMA and the process under the NWA are run concurrently to inform each other and minimise delays. • Guideline for involving Biodiversity Specialists in the EIA process (2005)- Ensures the engagement of a Biodiversity specialist is done under certain conditions and with a specific output to facilitate decision making and impact assessment. The need for a Faunal Ecologist and a Terrestrial Ecologist was identified and specialist input obtained through the NEMA process. • Guideline on Need and Desirability (2017) - The BAR report illustrates the need and desirability of the proposed expansion project at this site. • Guideline on Public Participation (2017) - Public participation must take place during the BAR process for the process to be transparent and allow for I&APs' comments and concerns to be raised and subsequently addressed. Proof of PPP will be provided for the final submission to DEADP. • SG 2.2 SAHRA APM Guidelines: Minimum Standards for the Archaeological & Palaeontological Components of Impact Assessment Reports (SAHRA).

6. Protocols

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form
The following protocols are applicable to the proposed project: 1. Site sensitivity verification requirements where specialist assessment is required but no specific assessment protocol has been prescribed (GN320 in GG43110 dated 20 March 2020) 2. Protocol for the specialist assessment and minimum report content requirements for environmental impacts on terrestrial biodiversity (GN320 in GG43110 dated 20 March 2020) 3. Protocol for the specialist assessment and minimum report content requirements for environmental impacts on terrestrial plant species (GN1150 in GG43855 dated 30 October 2020) 4. Protocol for the specialist assessment and minimum report content requirements for environmental impacts on terrestrial animal species (GN1150 in GG43855 dated 30 October 2020) 5. SG 2.2 SAHRA APM Guidelines: Minimum Standards for the Archaeological & Palaeontological Components of Impact Assessment Reports (SAHRA) A Terrestrial Animal Species specialist report was completed for the proposed project, which indicates compliance with protocol 4 above. A Terrestrial Biodiversity Assessment report was completed for the proposed project, which indicates compliance with protocols 2 and 3 above. A Heritage Impact Assessment report was completed for the proposed project, which indicates compliance with protocol 5 above. Refer to Screening Tool Report and the Site Sensitivity Verification Report in **Appendix I.**

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 1**	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A		
Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 3**	Describe the portion of the proposed development to which the applicable listed activity relates.
12	The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. **Western Cape** Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; Within critical biodiversity areas identified in bioregional plans; Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.	The proposed development footprint of approx. 9766m² will result in the clearance of more than 300m² of indigenous Overstrand Dune Strandveld which is listed as Endangered.

Note:

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

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

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

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

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

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

It is the intention of the Applicant to rezone and subdivide the subject property as follows:

- 6 Residential Erven (±750m² each)
- Private Road (±3 313m²)
- Private Open Space (POS) Zone (±20 733m²)
- Utility Services Zone (±1039m²)
- Conservation Zone (±35 389m²)

The Conservation Zone will be the property to the north, on the coastal side, on which the existing dwelling and infrastructure is located and will not undergo any changes. The remaining area to the south will form the residential estate with 6 dwellings, a road, an existing utility services area and Private Open Space in order to create a residential development to be integrated into the Romansbaai Beach & Fynbos Estate.

Therefore, no further development will take place in the POS or Conservation Zone. The Utility Services zone already exists but will be formalised. Vegetation clearance will be undertaken for the construction of the dwellings within the 6 residential erven and the Private Road required. Therefore, a footprint of ±7813m^2 is required (6 x dwellings, plus road), with a maximum footprint of ±9766m^2 required which includes a construction buffer.

The new private road will also be accessed via the internal road infrastructure of the Romansbaai Beach & Fynbos Estate and an access servitude from an existing cul-de- sac. The private road will be 3.5m wide and have a road reserve width of 8m that will provide access to the development. The proposed rezoning, subdivision and subsequent development can be interpreted as an extension of the existing Romansbaai Beach & Fynbos Estate.

The proposed 6 additional single residential erven will link with the existing services infrastructure of the Romansbaai Beach and Fynbos Estate development. According to the Romansbaai Beach and Fynbos Estate, there is sufficient municipal services capacity to provide the proposed 6 residential erven with the required services such as water, sewage, electricity and refuse removal, given that they abide to the conditions as set out by the Overstrand Municipality regarding Bulk Services Contribution Levies (BSCL).

A borehole and small solar plant exist in the south-eastern corner of the property and are utilised by the existing buildings on site (located in the future Conservation Zone). It has been decided to formalise the uses with the rezoning of an area of ±1 039m² in extent, labelled as 'Utility Services'. It is anticipated that electricity generated by the solar plant will be used to supplement municipal electricity for the dwellings on site. Further confirmation of Municipal service capacity will be obtained and provided as part of the NEMA process.

Please refer to Figures 2: Site Development Plan.

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

The owner of Portion 40 of Farm 711 intends to rezone and subdivide the subject property in order to create the proposed residential development. The proposed new development will be accessed via a new road that extends from the internal road infrastructure of the Romansbaai Beach & Fynbos Estate and an access servitude from an existing cul-de-sac. The proposed rezoning, subdivision and subsequent development can be interpreted as an extension of the existing Romansbaai Beach & Fynbos Estate.

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

There is no conflict with respect to existing approvals, the existing house and services will be located on separate erven and the proposal ties into the adjacent Roman's Bay Development seamlessly.

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

Western Cape Provincial Spatial Development Framework (PSDF) (2014)

The PSDF outlines the following key transitions to ensure sustainable settlement developments:

- Transition from an emphasis on 'greenfields' development and low-density sprawl to Emphasis on 'brownfields' development.
- Transition from segregated land use activities to integration of complementary land uses.

Furthermore, the PSDF also promotes "compact, mixed-use & integrated settlements as a provincial spatial policy" (1) as well "promote sustainable, integrated and inclusive housing in formal and informal markets" (2). This includes inter alia the following policies:

- Municipal SDFs to include growth management tools to achieve SPLUMA's spatial principles. These could include: a densification strategy and targets appropriate to the settlement context; an urban edge to protect agricultural land of high potential and contain settlement footprints; and a set of development incentives to promote integration, higher densities and appropriate development typologies.
- (2) Provide households with the residential environments, mobility and access to opportunities that support productive activities and reduce levels of exclusion from opportunity.
- (2) Increase densities of settlements and dwelling units in new housing projects.

Based on the above, it is deemed that the proposed development will align with the PSDF as the development will make use of a "brownfield site", result in increased densification on the property as well as within the demarcated urban edge, will result in the integration of complementary land uses and will promote integration of higher densities and appropriate development typologies.

4.2	The Integrated Development Plan of the local municipality.

Overstrand IDP 2022 – 2027

The Overstrand Integrated Development Plan (IDP) highlights the importance of biodiversity conservation within its management region and the goal of finding the right match between protecting natural and cultural resources (i.e., preventing their loss or degradation), whilst addressing the need for development. The proposed residential development falls within the Endangered Overberg Dune Strandveld vegetation type and will result in some loss of habitat but still incorporates the vegetation into its planning, the conservation zone and open spaces. Additionally, the site plan has been adapted to avoid the areas of high sensitivity habitat (see Botanical Specialist Report - Appendix G1).

4.3.	The Spatial Development Framework of the local municipality.

Overstrand Municipality SDF 2020

The Overstrand Municipal Spatial Development Framework (SDF) aims to promote the conservation of the natural environment in which Romansbaai is located and build the tourism industry based on the ecological and heritage value of the region. The proposed Romansbaai development falls within the Gaansbaai urban edge (Figure 3) the development plan still takes into account sensitive vegetation and habitat. The layout of the development is such that it avoids the high sensitivity vegetation, as delineated by the Botanical Specialist (See Appendix G1 and Figure 5). The development also includes a conservation area and private open spaces with intentions to maintain the indigenous vegetation in the most ecologically sound way possible.

4.4.	The Environmental Management Framework applicable to the area.

Overstrand IDF: Towards 2050 - Draft Strategic Environmental Management Framework

The Overstrand draft Environmental Management Framework (EMF) is an environmental planning tool that identifies where land uses are most compatible or incompatible with environmental opportunities and constraints. Key recommendations relevant to the proposed development include:

- **Natural habitats**: Fragmentation of continuous natural areas should be avoided. Decisions affecting pristine or threatened (critically endangered, endangered, or vulnerable) ecosystems should be informed by specialist biodiversity assessments and should consider
- **Endangered and critically endangered ecosystems**: Prevent further habitat loss or degradation. Activities that do not disrupt ecosystem functioning or further disturb the natural environment are considered appropriate in these systems.

In line with these requirements, the original development plan was edited after the Botanical, Faunal and Heritage Impact Assessments were conducted. The changes made to the development plan were done to further minimise environmental impacts and avoid "no-go" areas (as determined by the Botanical specialist). Additionally, the development plan includes a ±2ha private open space zone and a ±3.5ha conservation zone thus contributing to the protection and sustainable management of the natural habitat on the property.

The development can be seen as an extension of the existing Romansbaai Beach Estate and therefore will not be a significant change to the landscape.

The development is consistent with the Overstrand EMF because it:

- Minimises loss of high sensitivity habitat
- Is expected to have a low visual impact
- Incorporates conservation actions that will enhance long-term ecological health and aesthetic value

Overstrand Municipality Environmental Management Overlay Zones

The Overstrand Municipality Environmental Management Overlay Zone (EMOZ) Regulations 2020 aims to provide a mechanism though which the Council can issue and apply specific guidelines in terms of spatial development. The Overstrand Municipality EMOZ Regulations define 5 specific environmental management overlay zones:

1) Coastal Protection Environmental Management Overlay Zone
2) Mountain Catchment Environmental Management Overlay Zone
3) Protected Area Buffer Environmental Management Overlay Zone
4) Riverine Environmental Management Overlay Zone
5) Urban Conservation Environmental Management Overlay Zone

The proposed residential development falls within the Coastal Protection EMOZ. Schedule A of the Overstrand Municipality EMOZ regulations outlines prohibited activities within overlay zones while Schedule B outlines activities that require council permission and Schedule C outlines general regulations that must be considered within all 5 overlay zones. The proposed development does not trigger any prohibited activities; however, the following activities require council consent: Construction or placement of any permanent object, building, shelter, pathway or structure and Removal or destruction of vegetation which is protected and/or of conservation concern.

The proposed development activities aim to align with the general regulations outlined for EMOZs. An Environmental Management Plan (EMPr) which covers the planning and design, construction and operation phase of the development will be developed. The EMPr will outline measures to minimise negative impacts on the sensitive natural ecosystems including recommendations for the appropriate management of the private open space and conservation zones within the development.

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

This section will be updated after the public participation process has been concluded.

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

The Western Cape Biodiversity Spatial Plan (WCBSP) (2023) aims to guide sustainable development by providing a synthesis of biodiversity information to decision-makers. The main map categories are Critical Biodiversity Areas (Terrestrial and Aquatic), Ecological Support Areas (Critical and Other), Other Natural Remaining Areas and No Natural Remaining Areas. The first two mentioned categories represent the biodiversity priority areas which should be maintained in a natural to near-natural state. The last two mentioned categories are not considered as priority areas and a loss of biodiversity within these areas may be acceptable.

The site of the proposed development is over a CBA: Terrestrial – Threatened Ecosystem; and therefore, the objective of this area is to maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate. However, the area does fall within the urban edge of Gansbaai and will contribute to the conservation of the threatened ecosystem by establishing a conservation zone on the property. Additionally, areas of high botanical/terrestrial sensitivity were identified by a specialist, and these areas are to be treated as "no-go" areas, to the extent that the site layout was adjusted to avoid the loss of the high sensitivity habitats.

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

The proposed development is located outside the Coastal Management Line and Sensitive Development Areas. The proposed land use changes are all above the 100m setback line from the high-water mark. The area below the 100m setback line to the high-water mark consists of a private residence and associated infrastructure and will be rezoned for Conservation usage. Based on the above, the development aligns with the ICMA as the development takes place above 100m from the HWM and within the existing Urban Edge.

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

The Screening Tool Report remains the same as submitted along with the NOI.

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

The property lies within the Gansbaai urban edge, and the proposed residential development can be seen as an extension of the already existing Romansbaai Beach and Fynbos Estate. The development will make use of vacant land that is easily connected to the existing urban area, and the site layout has been designed to maximise open and conservation spaces. The proposed development will therefore result in increased densification on the property as well as within the demarcated urban edge. It will also result in the integration of complementary land uses and will promote integration of higher densities and appropriate development typologies in accordance with planning legislation.

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

The property lies within the Gansbaai urban edge, and the proposed residential development can be seen as an extension of the already existing Romansbaai Beach and Fynbos Estate. The development will make use of vacant land that is easily connected to the existing urban area, and the site layout has been designed to maximise open and conservation spaces and incorporate the natural habitats into its appeal.

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

All services including electricity, sewerage, water and waste disposal will be accessed through the connected Romansbaai Beach and Fynbos Estate. According to the Estate, there is sufficient municipal services capacity to provide the proposed 6 residential erven with the required services such as water, sewage, electricity and refuse removal, given that they abide to the conditions as set out by the Overstrand Municipality regarding Bulk Services Contribution Levies (BSCL).

A Civil Engineering Services Report was completed by Deca Consulting Engineers (See Appendix E16), from this report it can be concluded that:

- That the existing water reticulation system has adequate capacity to accommodate the proposed development and be connected to the existing reticulation system.
- That the existing sewage reticulation system has adequate capacity to accommodate the proposed development and be connected to the existing reticulation system;
- That the stormwater runoff from the proposed access road be connected to the existing stormwater system in the existing road in Romansbaai Estate;
- That because of the very low density of the development (2.4 Units/ha), the very permeable soil of the area and the topography of the site the proposed development will have very little effect on the post-development stormwater runoff;
- That the access road be provided according to Paragraph 5.4 within the report.
    - Material Depth = 600mm
    - Subgrade CBR = 7 - 15
    - Surfacing = 80mm Interlocking Paving
    - Base Course = 150mm G5
    - Sub-grade = 150mm G7 if required

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

See Appendix K.

SECTION F: PUBLIC PARTICIPATION

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

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

N/A

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

The section below outlines the various tasks undertaken/ to be undertaken as part of the Public Participation Process as stipulated in the EIA Regulations 2017, as amended. All documentation will be in English.

Pre-application Phase

- Interested and Affected Parties (I&APs) were identified throughout the process (Appendix F).
- Notification letters were emailed to all identified I&APs informing them of the activity and the opportunity to comment.
- A site notice was erected at the entrance to the property.
- An advertisement was placed in the Hermanus Times.
- A copy of the draft Basic Assessment Report (Pre-application) was made available on our company website www.phsconsulting.co.za
- A 30-day commenting period was allowed (11 June 2026 – 13 July 2026)

Application Phase:

- The official Application Form has been submitted to DEA&DP.
- All comments received during the pre-application phase commenting period have been included in the statutory draft Basic Assessment Report (BAR) (incl. EMPr) which will be circulated (via the preferred method of communication) to all registered I&APs, Organs of State and State Departments for a further 30-day commenting period in the statutory process.
- A Comments and Response Table will also be included and updated accordingly.
- A copy of the statutory draft BAR will be made available on our company website www.phsconsulting.co.za
- Further comments received on the statutory draft BAR will be responded to where applicable;
- Preparation of the FINAL BAR for submission to DEA&DP (which includes the proof of the Public Participation Process, comments received and our responses to these comments.)

Consultation with the Competent Authority:

The Provincial Department of Environmental Affairs and Development Planning (DEA&DP) has been identified as the Competent Authority. Consultation with the competent authority will be ongoing throughout the environmental process and will include the following as a minimum:

- Submission of the Notice of Intent to submit an application form and SSVR (COMPLETED);
- Circulation of the Pre-Application BAR for comment (COMPLETED);
- Submission of Application Form (COMPLETED);
- Circulation of the updated BAR for comment (THIS DOCUMENT); and
- Submission of the updated Final BAR for decision making.

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

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DEPARTMENT OF AGRICULTURE - NATIONAL
LUAHelpdesk@dalrrd.gov.za

DEA&DP: BIODIVERSITY & COASTAL MANAGEMENT
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4. If any of the State Departments and Organs of State were not consulted, indicate which and why.

N/A

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

Department of Agriculture and Heritage Western Cape did not respond.

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

See Appendix F for Comments and Response Report.

Note:

A register of all the I&AP's notified, including the Organs of State, and all the registered I&APs must be included in Appendix F. The register must be maintained and made available to any person requesting access to the register in writing.

The EAP must notify I&AP's that all information submitted by I&AP's becomes public information.

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

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

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

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

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

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. Groundwater

1.1.	Was a specialist study conducted?	YES	**NO**
1.2.	Provide the name and or company who conducted the specialist study.		
N/A			
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
Aquifer classification: Major Aquifer Type and Yield: Fractured 0.5-2.0 l/s The aquifer has not influenced the development.			
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.		
Depth: 21.21m. This has not influenced the development.			

2. Surface water

2.1.	Was a specialist study conducted?	YES	**NO**
2.2.	Provide the name and/or company who conducted the specialist study.		
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		
No watercourses and/ or wetlands are present on the property.			

3. Coastal Environment

3.1.	Was a specialist study conducted?	YES	**NO**
3.2.	Provide the name and/or company who conducted the specialist study.		
N/A			
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
The proposed development is located outside the Coastal Management Line and Sensitive Development Areas. The proposed land use changes are all above the 100m setback line from the high-water mark. The area below the 100m setback line to the high-water mark is privately developed but no land use changes are proposed within this area. Based on the above, the development aligns with the ICMA as the development takes place above 100m from the HWM and within the existing Urban Edge.			
3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.		
N/A			
3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.		
The development aligns with the ICMA as the development takes place above 100m from the HWM (within the existing Urban Edge), however the site does fall within the Coastal Protection Zone. The proposed development is not located near an estuary.			

4. Biodiversity

4.1.	Were specialist studies conducted?	**YES**	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		

Botanical Study: Nick Helme Botanical Assessments
Faunal Biodiversity Study: Jonathan Colville Terrestrial Ecologist and Faunal Surveys and Birding Africa (Callan Cohen).

4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.

Two ecological impact assessments were undertaken for Botanical and Terrestrial Ecology, and Faunal ecology. The following systematic conservation planning, and biodiversity informants were utilized:

1) **National Environmental Screening Tool**
   - Animal Species Theme Sensitivity (Medium)
   - Plant Species Theme Sensitivity (Medium)
   - Terrestrial Biodiversity Theme Sensitivity (Very High)

2) **The Western Cape Biodiversity Spatial Plan**
   - The plan indicates that the entire property is located within a CBA 1: Terrestrial with the exception of the pre-existing dwelling and small solar plant. Areas classified as CBA1 are essential for meeting biodiversity targets and should be maintained in a natural or near-natural state. Only low-impact, biodiversity-sensitive land uses are appropriate in these areas. Based on the objectives defined for CBAs, the site should not be allowed to degrade further but should rather be rehabilitated

3) **The SA Vegetation map (Mucina & Rutherford, 2018 update)**
   - The vegetation on the property is the Endangered Overberg Dune Strandveld. About 90% of its total original extent remains intact, about 36% is conserved, and the national conservation target is also 36%. The unit is known to support relatively few plant Species of Conservation Concern (Raimondo et al 2009), most of which are threatened by habitat loss to urban development and alien invasive vegetation

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

The Western Cape Biodiversity Spatial Plan (WCBSP) identifies the majority of the site, with the exception of the existing dwelling and associated infrastructure and a small solar plant, as a terrestrial Critical Biodiversity Area (CBA).

In line with the WCBSP objectives, CBAs should not be further degraded and should, where possible, be rehabilitated to support biodiversity persistence and ecosystem functioning. The proposed development has been informed by these objectives in the following ways:

- Avoidance of high sensitivity habitat: The proposed development will result the loss of some of the CBA however, the Terrestrial and Botanical Ecology Specialist identified that most of the site can be considered medium sensitivity habitat with four patches of high sensitivity. These high sensitivity areas are being considered as "no-go" areas and will not be removed.
- Conservation commitments: As part of the development plan, ±3.5 ha of the property (approximately half of the property) will be a conservation zone which constitutes ±3.1ha of Endangered vegetation. The habitat in this area will be managed and protected and includes the four areas of high sensitivity vegetation. The habitat will serve as an ecological corridor for the local biota and therefore reduce impacts of habitat fragmentation. An additional ±2ha will be private open space.

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

According to the Botanical Impact Assessment, the site is situated within the South Coast Fynbos Bioregion, part of the Greater Cape Floristic Region, which is globally recognised for its exceptional species richness and high conservation significance. The natural vegetation is classified as Overberg Dune Strandveld, listed as Endangered. The majority of the site is mapped as a Terrestrial Critical Biodiversity Area.

The natural vegetation on site has high structural diversity, with a mix of tall shrubs, small trees, grasses, restios and herbs. Autumn flowering geophytes are also present (*Brunsvigia* and *Oxalis*). At least four plant Species of Conservation Concern (SoCC) were recorded on site, as per below. All have viable populations on site. Two of these are clumped in mappable areas (see Figure 5 high sensitivity areas), but the other two are generally scattered throughout the site and there is thus little point in trying to map them. There is a low likelihood of any other SoCC being present on site.

Species	Red List Status	Numbers	Significance
Diosma demissa	Vulnerable	About 30 plants, clumped, in 3 areas	High; a rare local endemic
Babiana nana ssp. maculata	Near Threatened	About 10 plants; scattered	Medium; widely scattered on the south Cape coast from the Peninsula to Mossel Bay
Muraltia pappeana	Near Threatened	About 100 plants; scattered & widespread	Medium; widely scattered on the south Cape coast from Gansbaai to Stilbaai
Agathosma geniculata	Near Threatened	About 10 plants in northwest; clumped	High; a rare local endemic

Diosma demissa is an attractive species of buchu that grows only in the Gansbaai to Pearly beach area, with a tiny outlying population at Cape Point, and is one of the two priority plant species recorded on site (along with *Agathosma geniculata*). The long-lived shrub cannot be successfully translocated.

Babiana nana ssp. maculata is a spring flowering bulb, found only in coastal sands, from Cape Point to Mossel Bay. The species is rare on site, but fairly common around Gansbaai and on Romansbaai.

Muraltia pappeana is a shrub Red Listed as Near Threatened and occurs in coastal sands from De Kelders to Riversdale. The species is common throughout most of the study area, and elsewhere on Romansbaai Estate.

Agathosma geniculata is a shrub Red Listed as Near Threatened and occurs in coastal sands from De Kelders to Arniston. The species is rare on Romansbaai Estate, and rare on site, occurring only in a small patch in the northwest part of the site. The species is found mainly on limestones, from Stanford to De Hoop. The long-lived shrub cannot be successfully translocated.

The botanical sensitivity of the site is shown in Figure 5. Four areas of High sensitivity have been mapped, which incorporate the known patches of *Diosma demissa* and *Agathosma geniculata*. These areas have been avoided by the proposed development. The rest of the study area is of Medium to High botanical sensitivity.



Figure 5: Areas of high sensitivity are shaded in red, these were delineated by the terrestrial specialist and supported by the faunal specialist. The property for the proposed development is outlined in yellow, and the general area of the development is outlined in blue.

4.6.	If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.
The proposed development is not located in a Protected Area.	
4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.

The National Environmental Screening Tool indicated that the site as a Medium Animal Species Sensitivity and according to the Screening Tool the following species-specific sensitivities were identified:

Species Name	Sensitivity	SANBI Threat Status
*Aves- Circus ranivorus (*African Marsh Harrier)	MEDIUM	ENDANGERED
Aves- Circus maurus (Black Harrier)	MEDIUM	ENDANGERED
*Aves- Neotis denhami (*Denham's Bustard)	MEDIUM	VULNERABLE
*Aves- Afrotis afra (*Southern Black Korhaan)	MEDIUM	VULNERABLE
Invertebrate- Brinckiella aptera (Mute Winter Katydid)	MEDIUM	VULNERABLE
*Invertebrate- Aneuryphymus montanus (*Yellow-Winged Agile Grasshopper)	MEDIUM	VULNERABLE

The ***Circus ranivorus* (African Marsh Harrier)** is largely restricted to wetland sites and areas linking wetlands; the lack of these habitats at the site means that this raptor might only briefly visit on passage to other more suitable areas, and the site does not represent a viable habitat for the species.

The ***Circus maurus* (Black Harrier)** is the most significant avian species for the site and does occur in the general area and vegetation type of the project site. The project area represents high-quality foraging habitat and possibly breeding habitat. However, given the wide range of the species in that area, the small size of the site, that their preferred wetland breeding habitat is not present, it means the site is likely of low significance for this species.

The vegetation on the site is too dense for ***Neotis denhami* (Denham's Bustard)** and is not believed to occur at the site.

***Afrotis afra* (Southern Black Korhaan)** is not believed to occur at the site.

The project area falls within the geographic distributions of the two flagged Orthopteran SCC (***Brinckiella aptera* (Mute Winter Katydid) and *Aneuryphymus montanus* (Yellow-Winged Agile Grasshopper)**) and the project site offers suitable habitat. However, considering the wide distributional range of these two species, occurring across several different vegetation types, the project impact on these two species is considered low, particularly if areas of natural vegetation are retained at the project site; no further investigation for these species is required at this stage.

The project site likely also represents suitable habitat for the **Southern Adder**; areas of limestone outcrops, particularly on the eastern side of the site that link with outcrops on the Romansbaai Estate (see Appendix G2 – Faunal Report), and the area of the "Conservation Usage Erf (7)" below the proposed residential zone (see Appendix G2 – Faunal Report), are likely to be utilised by the adder. The botanical assessment done by Nick Helme flags an area to the east of the site as high sensitivity (Figure 5); this area would likely also represent suitable habitat for the Southern Adder. If the development footprints of the residential houses are kept to an absolute minimum, without gardens, and a large amount of natural vegetation is retained, including linking the development site into ecological corridors of the neighbouring Romansbaai Estate (Appendix G2), and no cats are allowed with restrictions on dogs (size, number and degree of freedom), then the project impact on the adder is considered likely to be low. It is recommended that a search-and-rescue operation for the Southern Adder to be undertaken prior to construction beginning.

According to the Faunal Specialist, no significant habitat loss or displacement of faunal species is likely to occur beyond what has already been assessed and approved. While some disturbance may occur during the construction, this is unlikely to result in significant impacts as sufficient intact natural systems are present in the immediate surroundings to which fauna can temporarily relocate.

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.
No geographical aspects will be influenced by the proposed project.

6. Heritage Resources

6.1.	Was a specialist study conducted?	**YES**	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
CTS Heritage – Jenna Lanvin			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		

The area proposed for development is located more than 3km from the Gansbaai Harbour and the oldest parts of Gansbaai Village and as such, no direct impact on these resources is anticipated. Gansbaai remains a place dominated by fishing culture and industries and it is unlikely that the proposed development will negatively impact on these aspects of the Gansbaai area.

The historic core of Gansbaai has significance in terms of intact fabric and its early 20th Century layout. This development is located far outside of the historic core of Gansbaai and is separated from the historic core by the existing Romansbaai Beach and Fynbos Estate. As such, while this development does not speak to the historic core of Gansbaai, it does align with the existing layout of the adjacent (linked) estate and as such, would be viewed as an extension of this estate.

The field assessment confirmed the findings of the desktop analysis which indicated that the area proposed for development has a higher sensitivity for impact to buried shell-midden archaeological resources. As such, it is recommended that proactive sampling excavations of the areas with surface scatters are undertaken.

The preferred layout has been mapped against the identified sensitivities. This layout is likely to impact the low-density surface scatters identified as sites 20, 21, 24 and 25. Test excavations of these scatters will provide the necessary insight to determine the depth of scientifically significant shell-midden deposits across the development area and will provide an opportunity to sample these significant sediments.

Based on the findings of Nilssen (2008) summarised above, it is not anticipated that the results of the recommended test excavations will impact on the proposed layout. As such, on condition that the recommended test excavations take place, archaeological monitoring of all construction excavations takes place and that a Conservation Management Plan is drafted for the ongoing management of the shell midden deposits, there is no objection to the proposed development from an archaeological perspective.

The palaeontological specialist study for the proposed subdivision and rezoning of Portion 40 of the Farm Klipfontein No. 711 in Gansbaai, Western Cape, has assessed the potential impacts on palaeontological resources. The study area is underlain by sediments of the Waenhuiskrans Formation of the Bredasdorp Group, which is known to have some palaeontological significance. However, the specific geological context and the nature of the proposed development suggest that the overall impact on palaeontological heritage is expected to be LOW.

The study found that the Waenhuiskrans Formation, while containing some palaeontological resources such as terrestrial gastropods, freshwater molluscs, and microfossils, generally exhibits LOW fossil abundance and diversity. The planned development involves only minor excavation activities limited to superficial sediment layers, further reducing the likelihood of encountering significant palaeontological resources.

There is no objection to the proposed development from a heritage perspective on condition that:

- Pro-active sampling excavations of the areas with surface scatter take place under a workplan approval from HWC. This can take place as a condition of approval.
- Archaeological monitoring of all construction excavations takes place
- A Conservation Management Plan is drafted for the ongoing management of the shell midden deposits
- **Chance Fossil Finds Protocol**: A Chance Fossil Finds Protocol should be integrated into the Environmental Management Programme (EMPr). This protocol will guide construction personnel on the steps to take in the event of an unexpected fossil discovery.

7. Historical and Cultural Aspects

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

Based on the information in the heritage screener, it is likely that the proposed development will impact on significant archaeological and palaeontological resources and as such a Heritage Impact Assessment was conducted by CTS – See Appendix G3: Heritage Report

The palaeontological specialist study for the proposed subdivision and rezoning of Portion 40 of the Farm Klipfontein No. 711 in Gansbaai, Western Cape, has assessed the potential impacts on palaeontological resources. The study area is underlain by sediments of the Waenhuiskrans Formation of the Bredasdorp Group, which is known to have some palaeontological significance. However, the specific geological context and the nature of the proposed development suggest that the overall impact on palaeontological heritage is expected to be LOW.

The study found that the Waenhuiskrans Formation, while containing some palaeontological resources such as terrestrial gastropods, freshwater molluscs, and microfossils, generally exhibits LOW fossil abundance and diversity. The planned development involves only minor excavation activities limited to superficial sediment layers, further reducing the likelihood of encountering significant palaeontological resources.

The preferred layout has been mapped against the identified sensitivities in Figure 6 below. This layout is likely to impact the low-density surface scatters identified as sites 20, 21, 24 and 25. Test excavations of these scatters will provide the necessary insight to determine the depth of scientifically significant shell-midden deposits across the development area and will provide an opportunity to sample these significant sediments.

Based on the findings of Nilssen (2008) summarised above, it is not anticipated that the results of the recommended test excavations will impact on this proposed layout. As such, on condition that the recommended test excavations take place, archaeological monitoring of all construction excavations takes place and that a Conservation Management Plan is drafted for the ongoing management of the shell midden deposits, there is no objection to the proposed development from an archaeological perspective.

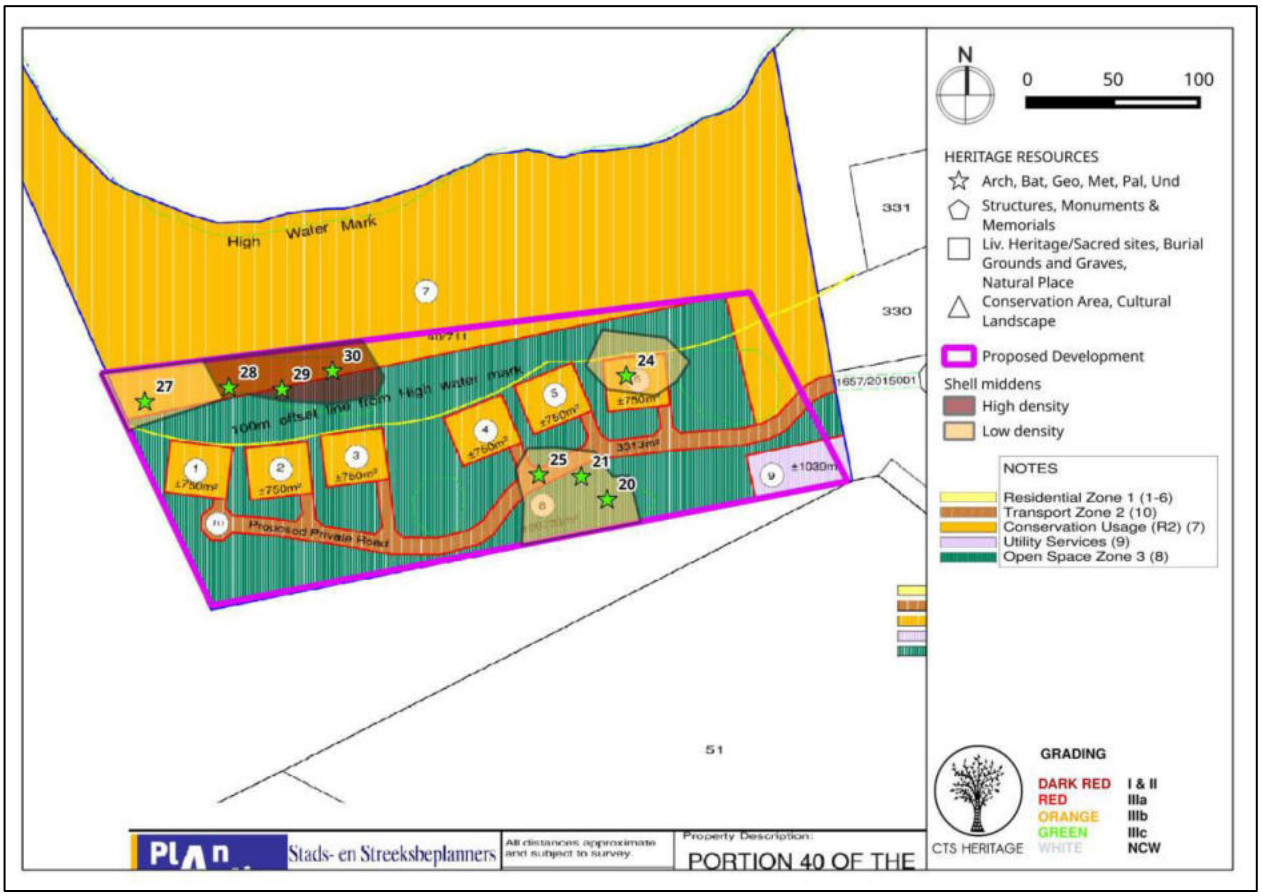


Figure 6: Preferred layout overlaid with heritage sensitivities identified.

8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.
The site of the proposed development lies approximately 4km S-SW of Gansbaai. The Greater Gansbaai area has a population of 11 598 with the growth rate of 4.8% estimated for 2011 to 2016. The area is well known for its shark cage diving industry and is becoming an increasingly popular tourist destination, with tourism being a significant contributor to the local economy. Fishing is one of the foundational elements of the local economy. Ultimately the economy is highly reliant on marine natural resources. Gansbaai is slowly becoming more popular for holidays, second residential homes and retirement. The settlement has a predominantly long and linear form and a low density, residential character.	
8.2.	Explain the socio-economic value/contribution of the proposed development.
The proposed development extent is situated adjacent to the upper middle class residential estate known as Romansbaai Beach and Fynbos Estate. The proposed development will serve as an extension of this estate once complete and will complement the surrounding land uses. It is important to note that a development of this nature does not require nearby employment opportunities as the residents buying into this type of development will either be of retirement age or have existing employment somewhere else. Furthermore, it is expected that the development will generate numerous short-and-long term employment opportunities during both the construction and operational phase for skilled and unskilled labour.	
8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.
The undeveloped site area will be managed to conserve the natural systems and scenic beauty on site. No social initiatives will be implemented by the Applicant.	
8.4.	Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development.
The proposed development will be located within and will form part of an existing residential estate (Romansbaai Beach and Fynbos Estate), and adhere to the Estates architectural guidelines, therefore, the proposed development and existing adjacent land uses are aligned. Development is bordered to the South and West by vacant land and is not visible from the nearest public road (Lord Roberts Road). The proposed residential development will not be visually intrusive and is thus deemed compatible with the existing & surrounding land uses and will be well absorbed into the local landscape. Furthermore, the proposed property is located within the demarcated urban edge and is earmarked for development in accordance with the Overstrand SDF (2020). The ecological impacts of the proposed project do not impact on people's environmental right in terms of access to resources, with no perceived opportunity cost. There is also no loss of amenity, or air quality impacts. The nuisance factors (dust and noise) will be highly localised and limited to the construction phase. No health impacts are anticipated.	

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. Details of the alternatives identified and considered

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

Provide a description of the preferred property and site alternative.

The only preferred site alternative for the proposed development is Portion 40 of Farm 711, Klip Fonteyn, located approximately 4km S-SW of Gansbaai, in the Overberg District. The greater property comprises an area of 6.62 ha in total, however, application will only be made for a newly subdivided portion which covers ±3.32ha in extent.

The site is situated adjacent to the Romansbaai Beach & Fynbos Estate, close to Danger Point. The site is situated in a predominantly mixed-use area consisting of residential developments, natural vegetation, tourist related uses and abalone farms.

The site is currently used for residential purposes. A manor house with associated outbuildings such as a helicopter hangar, an additional dwelling, a borehole and small solar power generation plant are established on the subject farm portion. Land uses that surround the site are residential dwellings, natural vegetation, private open spaces, tourist related businesses, public and private roads, abalone farms and utility uses. It is therefore evident that the site is situated within a mixed-use area of which the predominant use is residential. The site is inside the Urban Edge of the Overstand Municipal Spatial Development Framework.

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

No other properties or sites were considered.

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

The property for the proposed development was selected as the Applicant owns the land and intends to utilise its residential potential considering its located inside the urban edge and is earmarked for densification. No property alternatives exist.

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

No property or site alternatives were considered as this property is owned by the Applicant and ideally located adjacent to the Romansbaai Beach and Fynbos Estate. The proposed development will in essence be an extension of the existing Romansbaai Estate, the access road for the new development will connect to that of the existing development.

See layout alternatives section below.

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

The property for the proposed development was selected as the Applicant owns the land and intends to utilise its residential potential. No property alternatives exist.

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

The impacts listed below are applicable to the proposed activity on the property and will therefore apply to the Layout Alternatives below as well.

<u>Positive Impacts:</u>

- Temporary direct and indirect jobs will be created for skilled and unskilled labour during the construction phase
- Care and management of the new houses will generate permanent, albeit limited, employment during the operational phase
- The development falls within the existing urban edge of Gansbaai and therefore will contribute to the progression of the town and densification within the urban edge
- Conservation and protection of ±3.1 ha of Endangered vegetation in terms of the proposed '±3.5 ha Conservation Usage' Zoned Erf and the protection of approximately ±2 ha of Endangered vegetation through the private 'Open Space' Zoning that will remain intact. Making the total protected area ±5.1 ha.
- High sensitivity vegetation home to populations of plant SCC will not be impacted
- The proposed development is unlikely to generate significant negative impacts on any of the faunal SCC flagged
- A conservation contribution of R 500 000 will be made available for alien clearing in the Walker Bay Conservancy (WBC) this will act as an "offset" for the loss of Overberg Dune Strandveld vegetation to which alien vegetation is the primary threat. The NGO, Grootbos Foundation, will implement the

clearing works. The selected area to be cleared inside the WBC will be mutually agreed upon between the NGO and the Applicant before the funds are transferred. This is a voluntary contribution (based on the Botanical Specialists recommendation) and not a mandatory requirement in terms of the offset regulations.

Negative Impacts:

- Permanent loss of natural vegetation (Endangered vegetation type) and CBA area in the development footprints (Approximately ±7813m^2).
- Temporary to short term vegetation loss and disturbance will occur adjacent to all construction areas (±1953m^2). The permanent footprint plus a construction buffer making it ±9766m^2.
- Loss of the current high level of ecological connectivity across the study area, and associated habitat fragmentation
- Potential loss of heritage resources
- Minor construction-related impacts such as noise, dust, and potential temporary disturbance to local fauna.
- Increased generation of general waste
- Consumption of resources (electricity)
- The construction may also result in alien Argentine ant introduction, with associated negative ecological impacts on seed dispersal for up to 35% of the remaining indigenous plant species within 50m of any construction and thus covering most of the study area.
- Disturbance of the soil will also result in a weedy, pioneer plant community establishing in the disturbed areas, at the cost of the mature thicket and other Strandveld species.
- The primary cumulative impacts in the region are loss of natural vegetation and threatened plant species to ongoing urban development and alien plant invasion

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

Provide a description of the preferred activity alternative.

It is the intention of the Applicant to rezone and subdivide the subject property as follows:

- 6 Residential Erven (±750m² each)
- Private Road (±3 313m²)
- Private Open Space (POS) Zone (±20 733m²)
- Utility Services Zone (±1039m²)
- Conservation Zone (±35 389m²)

The Conservation Zone will be the property to the north, on the coastal side, on which the existing dwelling and infrastructure is located and will not undergo any changes. The remaining area to the south will form the residential estate with 6 dwellings, a road, an existing utility services area and Private Open Space in order to create a residential development to be integrated into the Romansbaai Beach & Fynbos Estate.

Therefore, no further development will take place in the POS or Conservation Zone. The Utility Services zone already exists but will be formalised. Vegetation clearance will be undertaken for the construction of the dwellings within the 6 residential erven and the Private Road required. Therefore, a footprint of ±7813m^2 is required (6 x dwellings, plus road), with a maximum footprint of ±9766m^2 required which includes a construction buffer.

The new private road will also be accessed via the internal road infrastructure of the Romansbaai Beach & Fynbos Estate and an access servitude from an existing cul-de- sac. The private road will be 3.5m wide and have a road reserve width of 8m that will provide access to the development. The proposed rezoning, subdivision and subsequent development can be interpreted as an extension of the existing Romansbaai Beach & Fynbos Estate.

The proposed 6 additional single residential erven will link with the existing services infrastructure of the Romansbaai Beach and Fynbos Estate development. According to the Romansbaai Beach and Fynbos Estate, there is sufficient municipal services capacity to provide the proposed 6 residential erven with the required services such as water, sewage, electricity and refuse removal, given that they abide to the conditions as set out by the Overstrand Municipality regarding Bulk Services Contribution Levies (BSCL).

Provide a description of any other activity alternatives investigated.

No alternative activities were considered.

Provide a motivation for the preferred activity alternative.

No alternative activities were considered.

Provide a detailed motivation if no activity alternatives exist.

The activity for the proposed development was selected because the applicant intends to utilise its proximity to the existing Romansbaai Beach and Fynbos Estate to create a sustainable 6 house residential development. This development will fall within the Gansbaai Urban Edge and will be seen as an extension of the existing Romansbaai Fynbos & Beach Estate. This activity is regarded as reasonable and feasible due to the proximity to an existing residential estate, its location inside the urban edge and the outcome of the specialist assessments.

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

Positive Impacts:

- Temporary direct and indirect jobs will be created for skilled and unskilled labour during the construction phase
- Care and management of the new houses will generate some permanent jobs
- The development falls within the existing urban edge of Gansbaai and therefore will contribute to the progression of the town
- Conservation and protection of ±3.1 ha of Endangered vegetation in terms of the proposed '±3.5 ha Conservation Usage' Zoned Erf and the protection of approximately ±2 ha of Endangered vegetation through the private 'Open Space' Zoning that will remain intact. Making the total protected area ±5.1 ha
- High sensitivity vegetation home to populations of plant SoCC will not be impacted
- A conservation contribution of R 500 000 will be made available for alien clearing in the Walker Bay Conservancy (WBC) this will act as an "offset" for the loss of Overberg Dune Strandveld vegetation to which alien vegetation is the primary threat. The NGO, Grootbos Foundation, will implement the clearing works. The selected area to be cleared inside the WBC will be mutually agreed upon between the NGO and the Applicant before the funds are transferred. This is a voluntary contribution (based on the Botanical Specialists recommendation) and not a mandatory requirement in terms of the offset regulations.

Negative Impacts:

- Loss of ±9766m^2 of Terrestrial CBA and protected vegetation
- Increased habitat fragmentation
- Potential loss of heritage resources
- Minor construction-related impacts such as noise, dust, and potential temporary disturbance to local fauna.
- General waste from construction site camp
- Possible sedimentation resulting from the stockpiling of construction materials and use of fill material
- Generation of general waste
- Consumption of resources (electricity)
- Likely invasive alien Argentine ant impacts (associated with human residences) on seed dispersal that is normally undertaken by the outcompeted indigenous ants

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

Provide a description of the preferred design or layout alternative.

It is the intention of the Applicant to rezone and subdivide the subject property as follows:

- 6 Residential Erven (±750m² each)
- Private Road (±3 313m²)
- Private Open Space (POS) Zone (±20 733m²)
- Utility Services Zone (±1039m²)
- Conservation Zone (±35 389m²)

The Conservation Zone will be the property to the north, on the coastal side, on which the existing dwelling and infrastructure is located and will not undergo any changes. The remaining area to the south will form the residential estate with 6 dwellings, a road, an existing utility services area and Private Open Space in order to create a residential development to be integrated into the Romansbaai Beach & Fynbos Estate.

Therefore, no further development will take place in the POS or Conservation Zone. The Utility Services zone already exists but will be formalised. Vegetation clearance will be undertaken for the construction of the dwellings within the 6 residential erven and the Private Road required. Therefore, a footprint of ±7813m^2 is

required (6 x dwellings, plus road), with a maximum footprint of ±9766m^2 required which includes a construction buffer.

The new private road will also be accessed via the internal road infrastructure of the Romansbaai Beach & Fynbos Estate and an access servitude from an existing cul-de- sac. The private road will be 3.5m wide and have a road reserve width of 8m that will provide access to the development. The proposed rezoning, subdivision and subsequent development can be interpreted as an extension of the existing Romansbaai Beach & Fynbos Estate.

The proposed 6 additional single residential erven will link with the existing services infrastructure of the Romansbaai Beach and Fynbos Estate development. According to the Romansbaai Beach and Fynbos Estate, there is sufficient municipal services capacity to provide the proposed 6 residential erven with the required services such as water, sewage, electricity and refuse removal, given that they abide to the conditions as set out by the Overstrand Municipality regarding Bulk Services Contribution Levies (BSCL).

See Figure 2 for the design layout.

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

One other design layout/alternative was initially considered prior to the specialist assessments (Figure 7). The access road was slightly smaller, and the private open space was slightly larger, however this layout would have required the clearing of high sensitivity vegetation. Therefore, after the specialist assessments were conducted, the layout was altered to avoid the areas of high sensitivity and thus reduce environmental impacts of the development.

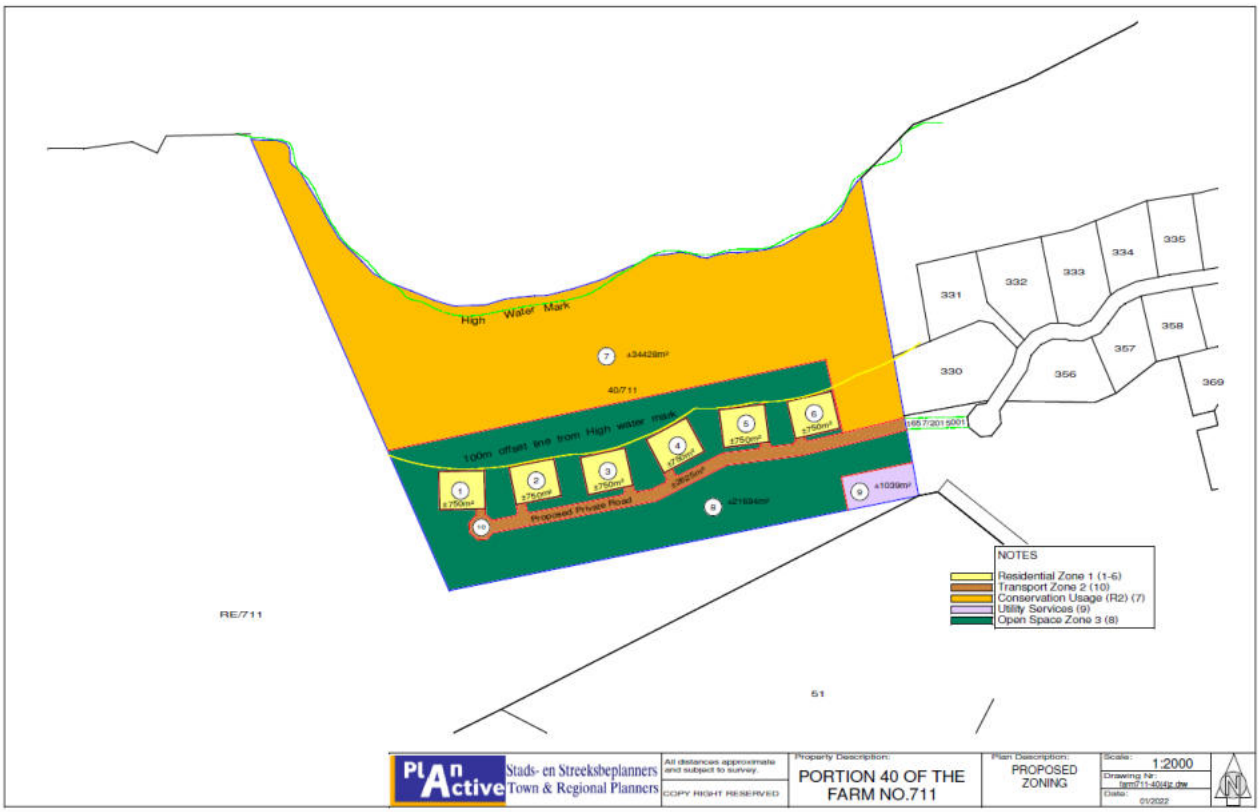


Figure 7: Alternative 1 - development design that was considered prior to specialist imput.

Provide a motivation for the preferred design or layout alternative.

The preferred design layout avoids high sensitivity natural habitat and therefore has a lower environmental impact than the initial layout (Alternative 1 – Figure 7) (which would have required the loss of the high sensitivity habitat). See Figure 2 above.

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

N/A

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

Positive Impacts:

- Temporary direct and indirect jobs will be created for skilled and unskilled labour during the construction phase
- Care and management of the new houses will generate some permanent jobs

- The development falls within the existing urban edge of Gansbaai and therefore will contribute to the progression of the town
- Conservation and protection of ±3.1 ha of Endangered vegetation in terms of the proposed '±3.5 ha Conservation Usage' Zoned Erf and the protection of approximately ±2 ha of Endangered vegetation through the private 'Open Space' Zoning that will remain intact. Making the total protected area ±5.1 ha
- **For Alternative 2 (preferred layout) -** High sensitivity vegetation home to populations of plant SoCC will not be impacted
- A conservation contribution of R 500 000 will be made available for alien clearing in the Walker Bay Conservancy (WBC) this will act as an "offset" for the loss of Overberg Dune Strandveld vegetation to which alien vegetation is the primary threat. The NGO, Grootbos Foundation, will implement the clearing works. The selected area to be cleared inside the WBC will be mutually agreed upon between the NGO and the Applicant before the funds are transferred. This is a voluntary contribution (based on the Botanical Specialists recommendation) and not a mandatory requirement in terms of the offset regulations.

Negative Impacts:

- Loss of ±9766m^2 of Terrestrial CBA and protected vegetation
    - **For Alternative 1** - this would include two of the four Very High sensitivity vegetation areas, along with associated loss of at least part of the site populations of 3 of the 4 (all except *Agathosma geniculata*, which is within 100m of the HWM, and thus outside of planned footprints) recorded plant Species of Conservation Concern (SCC) in these areas.
    - **Alternative 2 (preferred)** – this would only be medium to high sensitivity areas, and no SCC populations will be impacted.
- Increased habitat fragmentation
- Potential loss of heritage resources
- Minor construction-related impacts such as noise, dust, and potential temporary disturbance to local fauna.
- General waste from construction site camp
- Possible sedimentation resulting from the stockpiling of construction materials and use of fill material
- Generation of general waste
- Consumption of resources (electricity)
- Likely invasive alien Argentine ant impacts (associated with human residences) on seed dispersal that is normally undertaken by the outcompeted indigenous ants

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

Provide a description of the preferred technology alternative:

There are no technology alternatives as the proposed project is for the construction of 6 residential dwellings and a road.

Provide a description of any other technology alternatives investigated.

N/A

Provide a motivation for the preferred technology alternative.

There are no technology alternatives as the proposed project is for the construction of 6 residential dwellings and a road.

Provide a detailed motivation if no alternatives exist.

There are no technology alternatives as the proposed project is for the construction of 6 residential dwellings and a road.

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

There are no technology alternatives as the proposed project is for the construction of 6 residential dwellings and a road.

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

Provide a description of the preferred operational alternative.

There are no operational alternatives as the proposed project is for the construction of 6 residential dwellings and a road.

Provide a description of any other operational alternatives investigated.

There are no operational alternatives as the proposed project is for the construction of 6 residential dwellings and a road

Provide a motivation for the preferred operational alternative.

There are no operational alternatives as the proposed project is for the construction of 6 residential dwellings and a road.

Provide a detailed motivation if no alternatives exist.

There are no operational alternatives as the proposed project is for the construction of a residential development. The site will be used for residential dwellings, and the rest of the property will be conserved.

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

There are no operational alternatives as the proposed project is for the construction of a residential development. The site will be used for residential dwellings, and the rest of the property will be conserved.

Positive Impacts:

- Care and management of the new houses will generate some permanent jobs
- The development falls within the existing urban edge of Gansbaai and therefore will contribute to the progression of the town
- Conservation and protection of ±3.1 ha of Endangered vegetation in terms of the proposed '±3.5 ha Conservation Usage' Zoned Erf and the protection of approximately ±2 ha of Endangered vegetation through the private 'Open Space' Zoning that will remain intact. Making the total protected area ±5.1 ha
- High sensitivity vegetation home to populations of plant SoCC will not be impacted
- A conservation contribution of R 500 000 will be made available for alien clearing in the Walker Bay Conservancy (WBC) this will act as an "offset" for the loss of Overberg Dune Strandveld vegetation to which alien vegetation is the primary threat. The NGO, Grootbos Foundation, will implement the clearing works. The selected area to be cleared inside the WBC will be mutually agreed upon between the NGO and the Applicant before the funds are transferred. This is a voluntary contribution (based on the Botanical Specialists recommendation) and not a mandatory requirement in terms of the offset regulations.

Negative Impacts:

- Increased habitat fragmentation
- Potential loss of heritage resources
- Generation of general waste
- Consumption of resources (electricity)
- Likely invasive alien Argentine ant impacts (associated with human residences) on seed dispersal that is normally undertaken by the outcompeted indigenous ants

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

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

The 'No-Go' option, where the development of 6 dwellings and a road is not pursued, was evaluated. Overall, the proposed development is unlikely to generate significant negative impacts on any of the faunal SCC flagged. It is the specialists' opinion that the proposed development will have an overall low significance on the faunal SCC flagged. Although the Botanical Specialist states that the No Go alternative (continuation of the status quo) on this site would have significantly lower construction and operational phase botanical impacts (Neutral vs Medium) than the proposed development alternatives, if the "No-Go" was opted for then at the very least the remaining natural vegetation and habitat would not be conserved or managed formally considering it will remain Agriculture Zone 1. Through changing the land-use zoning its conserved in a sustainable way, considering the sites location inside the Urban Edge. In essence, the proposed development allows for the conservation of ±3.1 ha that would otherwise go unprotected and unmanaged. This alternative would furthermore result in the loss of positive socio-economic opportunities in the form of short-term and long-term income generating employment opportunities.

Furthermore, the site of the proposed residential development falls within the Urban Edge of Gansbaai and can be seen as an extension of the existing Romansbaai Beach and Fynbos Estate. The site is earmarked for infill development within the Urban Edge according to various planning legislation and it can be concluded that some form of development is inevitable on the property as densification inside the urban edge is encouraged.

The proposed development incorporates the need for urban development, growth and densification with the need to protect indigenous vegetation, it is essentially a representation of sustainability. The development plan

allows for the construction of 6 residential homes, but the layout has been designed to avoid areas of high sensitivity vegetation/habitat and incorporates private open space and a conservation zone to ensure that the remaining vegetation is conserved.

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

No other alternatives exist.

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

Portion 40 of Farm 711, Klip Fonteyn is located approximately 4km S-SW of Gansbaai, in the Overberg District. The greater property comprises an area of 6.62 ha in total, however, application will only be made for a newly subdivided portion which covers ±3.32 ha in extent.

The proposed site is situated adjacent to the Romansbaai Beach & Fynbos Estate, With Portion 40 of Farm 711 currently being used for residential purposes. A manor house with associated outbuildings such as a helicopter hangar, boat shed, an additional dwelling, a borehole and small solar power generation plant are established on the subject farm portion.

It is the intention of the Applicant to rezone and subdivide the subject property as follows:

- 6 Residential Erven (±750m² each)
- Private Road (±3 313m²)
- Private Open Space (POS) Zone (±20 733m²)
- Utility Services Zone (±1039m²)
- Conservation Zone (±35 389m²)

The Conservation Zone will be the property to the north, on the coastal side, on which the existing dwelling and infrastructure is located and will not undergo any changes. The remaining area to the south will form the residential estate with 6 dwellings, a road, an existing utility services area and Private Open Space in order to create a residential development to be integrated into the Romansbaai Beach & Fynbos Estate.

Therefore, no further development will take place in the POS or Conservation Zone. The Utility Services zone already exists but will be formalised. Vegetation clearance will be undertaken for the construction of the dwellings within the 6 residential erven and the Private Road required. Therefore, a footprint of ±7813m^2 is required (6 x dwellings, plus road), with a maximum footprint of ±9766m^2 required which includes a construction buffer.

The new private road will also be accessed via the internal road infrastructure of the Romansbaai Beach & Fynbos Estate and an access servitude from an existing cul-de- sac. The private road will be 3.5m wide and have a road reserve width of 8m that will provide access to the development. The proposed rezoning, subdivision and subsequent development can be interpreted as an extension of the existing Romansbaai Beach & Fynbos Estate.

The proposed 6 additional single residential erven will link with the existing services infrastructure of the Romansbaai Beach and Fynbos Estate development. According to the Romansbaai Beach and Fynbos Estate, there is sufficient municipal services capacity to provide the proposed 6 residential erven with the required services such as water, sewage, electricity and refuse removal, given that they abide to the conditions as set out by the Overstrand Municipality regarding Bulk Services Contribution Levies (BSCL).

A borehole and small solar plant exist in the south-eastern corner of the property and are utilised by the existing buildings on site (located in the future Conservation Zone). It has been decided to formalise the uses with the rezoning of an area of ±1 039m² in extent, labelled as 'Utility Services'. It is anticipated that electricity generated by the solar plant will be used to supplement municipal electricity for the dwellings on site. Further confirmation of Municipal service capacity will be obtained and provided as part of the NEMA process. The impacts of the proposed development are:

Positive Impacts:

- Temporary direct and indirect jobs will be created for skilled and unskilled labour during the construction phase
- Care and management of the new houses will generate some permanent jobs
- The development falls within the existing urban edge of Gansbaai and therefore will contribute to the progression of the town
- Conservation and protection of ±3.1 ha of Endangered vegetation in terms of the proposed '±3.5 ha Conservation Usage' Zoned Erf and the protection of approximately ±2 ha of Endangered vegetation through the private 'Open Space' Zoning that will remain intact. Making the total protected area ±5.1 ha
- **For Alternative 2 (preferred layout) -** High sensitivity vegetation home to populations of plant SoCC will not be impacted
- A conservation contribution of R 500 000 will be made available for alien clearing in the Walker Bay Conservancy (WBC) this will act as an "offset" for the loss of Overberg Dune Strandveld vegetation to which alien vegetation is the primary threat. The NGO, Grootbos Foundation, will implement the clearing works. The selected area to be cleared inside the WBC will be mutually agreed upon between the NGO and the Applicant before the funds are transferred. This is a voluntary contribution (based on the Botanical Specialists recommendation) and not a mandatory requirement in terms of the offset regulations.

Negative Impacts:

- Loss of ±9766m^2 of Terrestrial CBA and protected vegetation
    - **For Alternative 1** - this would include two of the four High sensitivity vegetation areas, along with associated loss of at least part of the site populations of 3 of the 4 (all except *Agathosma geniculata*, which is within 100m of the HWM, and thus outside of planned footprints) recorded plant Species of Conservation Concern in these areas.
- Increased habitat fragmentation
- Potential loss of heritage resources
- Minor construction-related impacts such as noise, dust, and potential temporary disturbance to local fauna.
- General waste from construction site camp
- Possible sedimentation resulting from the stockpiling of construction materials and use of fill material
- Generation of general waste
- Consumption of resources (electricity)
- Likely invasive alien Argentine ant impacts (associated with human residences) on seed dispersal that is normally undertaken by the outcompeted indigenous ants

With the implementation of mitigation measures (required by the specialists) the negative impacts of the preferred alternative are Low for Heritage and Faunal resources and Low-Medium for Botanical.

2. "No-Go" areas

Explain what "no-go" area(s) have been identified during identification of the alternatives and provide the co-ordinates of the "no-go" area(s).
No Go areas were identified by the Botanical Specialist (Appendix G1 – Botanical Report). The specialist identified four areas of high sensitivity (no go areas), these areas coincide with populations of two botanical SCCs, *Diosma demissa* and *Agathosma geniculate*. See Figure 5 above in Section G.

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

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

The significance of each impact identified was assessed according to the following variables (evaluation components):

Significance is the product of probability and severity. Probability describes the likelihood of the impact actually occurring, and is rated as follows:

Probability

Probability		
Improbable	Low possibility of impact to occur either because of design or historic experience.	Rating = 1
Probable	Distinct possibility that impact will occur.	Rating = 2
Highly probable	Most likely that impact will occur.	Rating = 3
Definite	Impact will occur, in the case of adverse impacts regardless of any prevention measures.	Rating = 4

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

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

Intensity factor		
Low intensity	Natural and man-made functions not affected.	Factor 1
Medium intensity	Environment affected but natural and man-made functions and processes continue.	Factor 2
High intensity	Environment affected - natural or man-made functions are altered to the extent that it will temporarily or permanently cease or become dysfunctional.	Factor 3

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

Duration		
Short term	<1 to 5 years	Factor 1
Medium term	5 to 15 years	Factor 2
Long term	Impact will only cease after the operational life of the activity, either because of natural process or by human intervention	Factor 3
Permanent	Mitigation, either by natural process or by human intervention, will not occur in such a way or in such a time span that the impact can be considered transient	Factor 4

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

The severity factor = intensity factor x duration factor
= 2 x 3
= 6

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

Rating	**Factor**
Low severity (rating 2)	Calculated values 2 to 4
Medium severity (rating 3)	Calculated values 5 to 8
High severity (rating 4)	Calculated values 9 to 12
Very high severity (rating 5)	Calculated values 13 to 16
Severity factors below 3 indicate no impact	

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

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

Significance rating		
Low significance	Calculated significance rating 4 to 6	Positive impact and negative impacts of low significance should have no influence on the proposed development project.
Medium significance	Calculated significance rating >6 to 15	Positive impact: Should weigh towards a decision to continue. Negative impact: Should be mitigated to a level where the impact would be of medium significance before project can be approved.
High significance	Calculated significance rating 16 and more	Positive impact: Should weigh towards a decision to continue, should be enhanced in final design. Negative impact: Should weigh towards a decision to terminate proposal, or mitigation should be performed to reduce significance to at least medium significance rating.

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

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

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

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

See Appendix J for full Impact Assessment of each alternative.

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

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

BOTANICAL IMPACT ASSESSMENT

Findings

According to the Ecological Impact Assessment, the site is situated within the South Coast Fynbos Bioregion, part of the Greater Cape Floristic Region, which is globally recognised for its exceptional species richness and high conservation significance. The natural vegetation is classified as Overberg Dune Strandveld, listed as Endangered. The majority of the site is mapped as a Terrestrial Critical Biodiversity Area.

At least four plant Species of Conservation Concern (SoCC) were recorded on site, as per below. All have viable populations on site. Two of these are clumped in mappable areas (see Figure 5 high sensitivity areas). There is a low likelihood of any other SoCC being present on site. SoCC confirmed present on site are:

1) ***Diosma demissa*** is an attractive species of buchu that grows only in the Gansbaai to Pearly beach area, with a tiny outlying population at Cape Point, and is one of the two priority plant species recorded on site (along with *Agathosma geniculata*). The long-lived shrub cannot be successfully translocated.
2) ***Babiana nana ssp. maculata*** is a spring flowering bulb, found only in coastal sands, from Cape Point to Mossel Bay. The species is rare on site, but fairly common around Gansbaai and on Romansbaai.
3) ***Muraltia pappeana*** is a shrub Red Listed as Near Threatened and occurs in coastal sands from De Kelders to Riversdale. The species is common throughout most of the study area, and elsewhere on Romansbaai Estate.
4) ***Agathosma geniculata*** is a shrub Red Listed as Near Threatened and occurs in coastal sands from De Kelders to Arniston. The species is rare on Romansbaai Estate, and rare on site, occurring only in

a small patch in the northwest part of the site. The species is found mainly on limestones, from Stanford to De Hoop. The long-lived shrub cannot be successfully translocated.

The botanical sensitivity of the site is as shown in Figure 5. Four areas of High sensitivity have been mapped, which incorporate the known patches of *Diosma demissa* and *Agathosma geniculata*. The rest of the study area is of Medium to High botanical sensitivity.

Construction Phase: Botanical significance of this habitat and species loss for Alternative 1 would be Medium - High negative. After mitigation (Alternative 2; with included redesign of layout to avoid all High sensitivity patches) this could be reduced to Low to Medium negative.

Operational Phase: The overall habitat fragmentation and loss of ecological connectivity impact is likely to be Low to Medium negative at the property scale (before and after mitigation, both alternatives), as the development will result in loss or degradation of about 40% of the currently undisturbed natural vegetation on the site.

Impacts

Construction Phase

- Alternative 2 (Preferred):
    - all vegetation loss will be in Medium to High sensitivity areas, as all four High sensitivity patches will be avoided, as will all four plant SoCC.
    - Temporary to short term vegetation loss and disturbance will occur adjacent to all construction areas and judging by previous and current disturbance patterns around houses and along roads on the Romansbaai Estate, will increase the overall development footprint by about 25% for each alternative (thus an additional 0.25ha or so).
- Alternative 1:
    - This would include two of the four High sensitivity vegetation areas, along with associated loss of at least part of the site populations of 3 of the 4 (all except *Agathosma geniculata*, which is within 100m of the HWM, and thus outside of planned footprints) recorded plant Species of Conservation Concern in these areas.
    - Areas where vegetation loss will be total include about 35% of the current study area (about 1ha). About 0.3ha of development will be in High sensitivity areas, and the rest in Medium to High sensitivity areas.

Operational Phase

- Loss of the current high level of ecological connectivity across the study area, and associated habitat fragmentation.
- The construction may also result in alien Argentine ant introduction, with associated negative ecological impacts on seed dispersal for up to 35% of the remaining indigenous plant species within 50m of any construction and thus covering most of the study area.
- Disturbance of the soil will also result in a weedy, pioneer plant community establishing in the disturbed areas, at the cost of the mature thicket and other Strandveld species.

Mitigation

- No gardening should be allowed on any of the development plots/erven, in order to reduce development footprints and impacts, and purchasers should instead keep undisturbed as much of the high diversity natural vegetation on each plot as possible.
- Any approved development and road footprints should be clearly demarcated (by temporary fencing) on site prior to any development. No disturbance of natural vegetation outside of these demarcated areas should be allowed, either during construction or thereafter.
- A minimum 5m buffer of natural vegetation must be maintained between the outer boundary of all mapped areas of High sensitivity and any development or disturbance.
- Any listed invasive alien plant species should be removed from the site (none currently evident) on an annual ongoing basis, using approved methodology. The main invasive species on the Romansbaai Estate are rooikrans (*Acacia cyclops*) and manitoka (*Myoporum serratum* and *M. tenuifolium*).
- Search and Rescue of all translocatable bulbs (geophytes, notably the Near Threatened Babiana nana) and any other translocatable species should be undertaken from the approved development footprints prior to construction. This should be done at the end of the flowering season

for the relevant species (ranges from April to October) and must be undertaken by horticulturists familiar with the rescue and growing on of the species in the area. Material should be translocated to other parts of the property where it will not be disturbed in future, and which is ecologically similar. Alternatively rescued material could be kept in a nursery and then used on site for rehabilitation of any disturbed areas once all development is complete.

- Only locally indigenous Strandveld plant species noted in this report should be used for any rehabilitation of disturbed areas or landscaping/gardening on the greater study area.
- A conservation contribution by the applicant is thus strongly recommended to help finance, coordinate and manage alien vegetation clearing in the vegetation type (Overberg Dune Strandveld) that will be impacted by this development. The funding could be made available to an NGO active in the area, such as the Walker Bay Conservancy. The quantum of the donation should be linked to the costs for clearing 25ha of densely invaded Strandveld, in accordance with ratios (1:20 for Endangered habitat) in the offset guidelines (Department of Forestry, Fisheries & the Environment. 2023), even though this is not required as an official, mandatory biodiversity offset process (as mitigated impact level is Low – Medium negative rather than Medium negative).

FAUNAL ASSESSMENT

Findings

- The ***Circus ranivorus* (African Marsh Harrier)** is largely restricted to wetland sites and areas linking wetlands; the lack of these habitats at the site means that this raptor might only briefly visit on passage to other more suitable areas, and the site does not represent a viable habitat for the species.
- The ***Circus maurus* (Black Harrier)** is the most significant avian species for the site and does occur in the general area and vegetation type of the project site. The project area represents high-quality foraging habitat and possibly breeding habitat. However, given the wide range of the species in that area, the small size of the site, that their preferred wetland breeding habitat is not present, it means the site is likely of low significance for this species.
- The vegetation on the site is too dense for ***Neotis denhami* (Denham's Bustard)** and is not believed to occur at the site.
- ***Afrotis afra* (Southern Black Korhaan)** is not believed to occur at the site.
- The project area falls within the geographic distributions of the two flagged Orthopteran SCC (***Brinckiella aptera* (Mute Winter Katydid) and *Aneuryphymus montanus* (Yellow-Winged Agile Grasshopper)**) and the project site offers suitable habitat. However, considering the wide distributional range of these two species, occurring across several different vegetation types, the project impact on these two species is considered low, particularly if areas of natural vegetation are retained at the project site; no further investigation for these species is required at this stage.
- The project site likely also represents suitable habitat for the **Southern Adder**; areas of limestone outcrops, particularly on the eastern side of the site that link with outcrops on the Romansbaai Estate (see Appendix G2), and the area of the "Conservation Usage Erf (7)" below the proposed residential zone (see Appendix G2), are likely to be utilised by the adder.

Impacts

Overall, the proposed development is unlikely to generate significant negative impacts on any of the faunal SCC flagged once mitigation is followed. It is the specialists' opinion that the proposed development will have an overall low significance on the faunal SCC flagged.

Mitigation

- Development footprints of the residential houses are to be kept to a minimum, without gardens, retaining a large amount of natural vegetation, including linking the development site into ecological corridors of the neighbouring Romansbaai Estate.
- Burger et al. (2006) and Harrison (2006) in their faunal assessments for the neighbouring Romansbaai Beach & Fynbos Estate listed a number of practical and detailed conservation and mitigation measures. These must be considered and undertaken for the proposed development. These have been included in the EMPr where applicable.
- A search-and-rescue operation for the Southern Adder to be undertaken prior to construction beginning.
- Reduce Light Pollution:
    - Fixtures on lights to cover the light bulb and direct the light to where it is needed.
    - Use timers and sensors to control when lights are on and to make lights motion activated.

- Use coloured lights, such as long wavelength amber and red lights. Yellow illumination lights have also been shown to attract less moth specimens. Filtered amber LED lamps with no blue and minimal green light content to be used for outdoor lighted areas.
- An outdoor lighting plan should be considered that includes an overall reduction of nocturnal lighting.

HERITAGE ASSESSMENT

Findings

- Archaeological
  - The field assessment identified 14 observations, including several shell middens. As the study area falls inside the 500m high-water archaeologically sensitive area, almost every surface has some evidence of limited shell scatter, with 3 areas identified as having low-density scatters, and one area exhibiting very high-density levels.
  - The shell midden scatters contain lithiecs, pottery shards, and ostrich eggshell (OES). The one area is located at a noticeably higher elevation than the rest of the study area (also visible on the Topo 1:50 000 map). This area was covered in dense vegetation and as such survey opportunities were limited, however, the koppie is marked by a 20m contour line on the Topo 1:50 000 Map. The sea-facing northern side of the study area has higher density shell scatters, which were also more visible due to the vegetation being less dense and consisting of smaller shrubs and ankle-height vegetation.
  - One dog grave, Boelie's Grave, was also identified near the southern edge of the proposed area. The southeastern corner of the development footprint has a solar panel area, as well as an area cleared for a plant nursery.
- Paleontological
  - **Underlying Geology of Development Area -** The underlying geology of the proposed subdivision and rezoning of Portion 40 of the Farm Klipfontein No. 711, Gansbaai, area is depicted on the 1:250 000 Worcester 3319 Geological map (Council of Geoscience, Pretoria) (Figure 8). The map shows that the proposed project area is underlain by sediments of the Waenhuiskrans Formation (Bredasdorp Group). The nature of the geology in the surrounding area has been well documented by Milan 1990. Below follows a description of the relevant geological units in the vicinity of the project area.
    - The Waenhuiskrans Formation (Qw) is a Late Pleistocene aeolian formation within the Bredasdorp Group. Initially referenced by Haughton et al. (1937), the Waenhuiskrans Formation was formalised by Malan in 1989, having a type area at the coastal village of Waenhuiskrans. The formation represents semi-consolidated dunes extending laterally along the present coastline from Hermanus to Plettenberg Bay, forming a 0.2 to 3 km-wide discontinuous outcrop. The Waenhuiskrans Formation overlies the marine/estuarine Klein Brak Formation and was deposited during the Late Pleistocene glacial period, when sea levels were 130 m lower than present. The upper boundary is defined as the base of overlying calcrete, soil, scree, or unconsolidated aeolian sand of the Strandvel Formation.
    - The thickness of the unit varies significantly, with a maximum thickness of over 200 m in the Wilderness-Sedgefield area and an inferred average thickness of 30m. It is semi-consolidated in some areas and less so in others, with considerable variability in structure and consistency. The formation comprises calcarenite and calcareous sandstone with well-sorted medium-grained, well to very well-rounded quartz grains, and finely comminated shell fragments. The formation is characterised by large-scale planar crossbedding with bed thicknesses up to 12 m and bedding surfaces dipping up to 30 degrees.
  - **Sensitivity -** The palaeontological heritage of the current study is part of Bredasdorp Group (Waenhuiskrans Formation). Based on the SAHRIS Palaeo Map (Figure 9), the Waenhuiskrans Formation has a very high palaeontological sensitivity.
    - The Waenhuiskrans Formation is rich in terrestrial gastropods, freshwater molluscs, microfossils, trace fossils, and other fossilised material. Among its key palaeontological components are terrestrial gastropods such *as Achatina zebra, Tropidophora sp., Trigonephris sp.*, and *Natalina sp.*, which provide insights into environmental conditions during the Late Pleistocene. Freshwater molluscs in the Waenhuiskrans Formation include *Burnupia, Planorbis, and Succinea*, indicating that parts of the formation were influenced by freshwater environments. Microfossils like wind-abraded benthic foraminifera (*Elphidium*

crispum, Poroeponides pateralis, and Ammonia spp.) are present. (McMillan, I.K. 1986), suggest marine influence and environmental changes over time. Trace fossils have also been observed, with a notable example being feeding trails that measure 17 mm in diameter, likely made by larvae of tipulid insects (crane flies). In addition, the formation contains other fossilised material such as comminuted shell fragments, wind-abraded echinoid spines, and bryozoan fragments, reflecting the marine elements and the mixed environmental nature of the Waenhuiskrans Formation.



Figure 8: Geology Map. Extract from the CGS 3319 Worcester Geology Map indicating that the development area is underlain by Qw: Waenhuiskrans Formation, Bredasdorp Group.



Figure 9: Previous HIAs Map. Previous Heritage Impact Assessments surrounding the proposed development area, with SAHRIS NIDs indicated.

Mitigation

There is no objection to the proposed development from a heritage perspective on condition that:

- Pro-active sampling excavations of the areas with surface scatter take place under a workplan approval from HWC. This can take place as a condition of approval.
- Archaeological monitoring of all construction excavations takes place
- A Conservation Management Plan is drafted for the ongoing management of the shell midden deposits
- Chance Fossil Finds Protocol: A Chance Fossil Finds Protocol should be integrated into the Environmental Management Programme (EMPr). This protocol will guide construction personnel on the steps to take in the event of an unexpected fossil discovery.

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

BOTANICAL:

- No gardening should be allowed on any of the development plots/erven, in order to reduce development footprints and impacts, and purchasers should instead keep undisturbed as much of the high diversity natural vegetation on each plot as possible.
- Any approved development and road footprints should be clearly demarcated (by temporary fencing) on site prior to any development. No disturbance of natural vegetation outside of these demarcated areas should be allowed, either during construction or thereafter.
- A minimum 5m buffer of natural vegetation must be maintained between the outer boundary of all mapped areas of High sensitivity and any development or disturbance.
- Any listed invasive alien plant species should be removed from the site (none currently evident) on an annual ongoing basis, using approved methodology. The main invasive species on the Romansbaai Estate are rooikrans (*Acacia cyclops*) and manitoka (*Myoporum serratum* and *M. tenuifolium*).
- Search and Rescue of all translocatable bulbs (geophytes, notably the Near Threatened Babiana nana) and any other translocatable species should be undertaken from the approved

development footprints prior to construction. This should be done at the end of the flowering season for the relevant species (ranges from April to October) and must be undertaken by horticulturists familiar with the rescue and growing on of the species in the area. Material should be translocated to other parts of the property where it will not be disturbed in future, and which is ecologically similar. Alternatively rescued material could be kept in a nursery and then used on site for rehabilitation of any disturbed areas once all development is complete.

- Only locally indigenous Strandveld plant species noted in this report should be used for any rehabilitation of disturbed areas or landscaping/gardening on the greater study area.
- A conservation contribution of R 500 000 will be made available for alien clearing in the Walker Bay Conservancy (WBC) this will act as an "offset" for the loss of Overberg Dune Strandveld vegetation to which alien vegetation is the primary threat. The NGO, Grootbos Foundation, will implement the clearing works. The selected area to be cleared inside the WBC will be mutually agreed upon between the NGO and the Applicant before the funds are transferred. This is a voluntary contribution (based on the Botanical Specialists recommendation) and not a mandatory requirement in terms of the offset regulations.

FAUNAL:

- Development footprints of the residential houses are to be kept to a minimum, without gardens, retaining a large amount of natural vegetation, including linking the development site into ecological corridors of the neighbouring Romansbaai Estate.
- Burger et al. (2006) and Harrison (2006) in their faunal assessments for the neighbouring Romansbaai Beach & Fynbos Estate listed a number of practical and detailed conservation and mitigation measures. These must be considered and undertaken for the proposed development. These have been included in the EMPr where applicable.
- A search-and-rescue operation for the Southern Adder to be undertaken prior to construction beginning.
- Reduce Light Pollution:
    - Fixtures on lights to cover the light bulb and direct the light to where it is needed.
    - Use timers and sensors to control when lights are on and to make lights motion activated.
    - Use coloured lights, such as long wavelength amber and red lights. Yellow illumination lights have also been shown to attract less moth specimens. Filtered amber LED lamps with no blue and minimal green light content to be used for outdoor lighted areas.
    - An outdoor lighting plan should be considered that includes an overall reduction of nocturnal lighting.

HERITAGE:

- Pro-active sampling excavations of the areas with surface scatter take place under a workplan approval from HWC. This can take place as a condition of approval.
- Archaeological monitoring of all construction excavations takes place
- A Conservation Management Plan is drafted for the ongoing management of the shell midden deposits
- Chance Fossil Finds Protocol: A Chance Fossil Finds Protocol should be integrated into the Environmental Management Programme (EMPr). This protocol will guide construction personnel on the steps to take in the event of an unexpected fossil discovery.

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

All identified impact management measures will be implemented. No further specialist studies are required in terms of NEMA.

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

The proposed development will have a small positive impact on the surrounding communities as temporary direct and indirect jobs will be created for skilled and unskilled labour during the construction phase. The proposed development will not negatively impact on surrounding communities. There will be no loss of amenity, or air quality impacts. The nuisance factors (dust and noise) will be highly localised and limited to the construction phase. No health impacts are anticipated.

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

According to the Western Cape Department of Environmental Affairs, Development and Planning, the province will experience an increase in annual temperatures, increased maximum temperature, more heat waves, fewer frost days, reduced rainfall, sea-level rise, increased fire risks, and increased frequency and intensity of severe weather events.

The proposed development is located outside the Coastal Management Line and Sensitive Development Areas. The proposed land use changes are all above the 100m setback line from the high-water mark. The area below the 100m setback line to the high-water mark is privately developed but no land use changes are proposed within this area. Based on the above, the development aligns with the ICMA as the development takes place above 100m from the HWM (within the existing Urban Edge) and therefore outside the Coastal Protection Zone.

Increased fire risk is the primary factor that will influence the proposed development. The proposed development is located within a fire dependant ecosystem that requires regular burns to maintain ecosystem integrity. The risk of fire was identified by the Botanical specialist and mitigation included in the EMPr.

The risk of increased drought conditions is not anticipated to have an influence on the development – the landscaping will be endemic and indigenous (where needed) and irrigation needs are minimal, thus making the development more drought resilient.

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

There are no conflicting specialist recommendations.

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

The impacts identified and the proposed mitigation measures outlined by the terrestrial, faunal and heritage specialists were included in the EMPr for the project and will be implemented during the design, planning and construction and operational phases of the development.

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

The NEMA EIA regulations require that a hierarchical approach is taken with regards to impact management. Implementation of the mitigation hierarchy requires that potential impact management measures are implemented in order from the most beneficial method of impact mitigation to the least beneficial method of impact mitigation. A visual illustration of the mitigation hierarchy is provided in Figure 10.

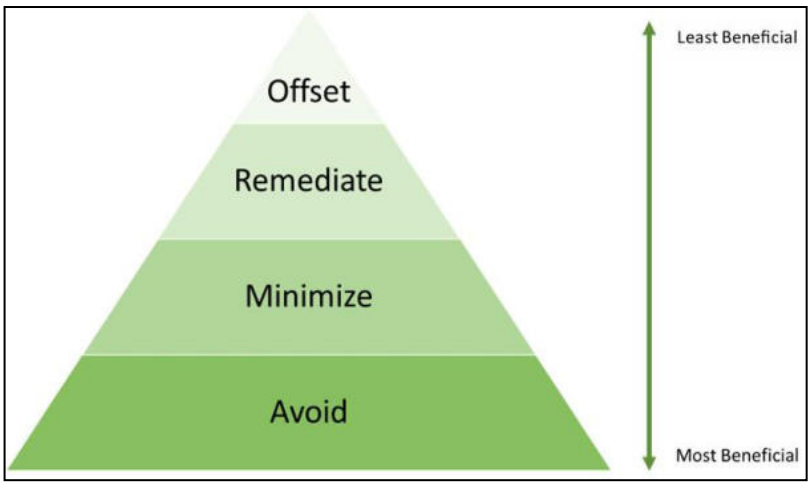


Figure 10: Mitigation hierarchy

This hierarchy was applied to identify the best practicable and environmentally sensitive layout option for the proposed development:

Avoidance: This is the first step of the mitigation hierarchy which comprises measures taken to avoid impacts from the outset, such as careful spatial or temporal placement of infrastructure or disturbance. The preferred development layout takes sensitive areas into consideration and is arranged to avoid the areas of highest sensitivity.

Minimisation: This entails measures taken to reduce the duration, intensity and/or extent of impacts that cannot be completely avoided. All mitigation measures have been included in management documents (OEMPR and CEMPR) for approval and implementation during the various phases of the development management.

Rehabilitation: This entails measures taken to improve degraded or removed ecosystems following exposure to impacts that cannot be completely avoided or minimised. Following completion of construction, all areas outside of the planned footprint that may have been temporarily affected will need to be assessed for rehabilitation by a specialist and if necessary, a rehabilitation plan will be implemented.

Offset: this entails measures taken to compensate for any residual, adverse impacts after full implementation of the previous three steps of the mitigation hierarchy. No offset required.

SECTION J: GENERAL

1. Environmental Impact Statement

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

The key findings of the EIA indicate that the proposed development will have both positive and negative impacts, however, all negative impacts can be significantly mitigated through implementation of reasonable and practical mitigation measures.

Positive Impacts:

- Temporary direct and indirect jobs will be created for skilled and unskilled labour during the construction phase
- Care and management of the new houses will generate some permanent jobs
- The development falls within the existing urban edge of Gansbaai and therefore will contribute to the progression of the town
- Conservation and protection of ±3.1 ha of Endangered vegetation in terms of the proposed '±3.5 ha Conservation Usage' Zoned Erf and the protection of approximately ±2 ha of Endangered vegetation through the private 'Open Space' Zoning that will remain intact. Making the total protected area ±5.1 ha
- High sensitivity vegetation home to populations of plant SoCC will not be impacted
- A conservation contribution of R 500 000 will be made available for alien clearing in the Walker Bay Conservancy (WBC) this will act as an "offset" for the loss of Overberg Dune Strandveld vegetation to which alien vegetation is the primary threat. The NGO, Grootbos Foundation, will implement the clearing works. The selected area to be cleared inside the WBC will be mutually agreed upon between the NGO and the Applicant before the funds are transferred. This is a voluntary contribution (based on the Botanical Specialists recommendation) and not a mandatory requirement in terms of the offset regulations.

Negative Impacts:

- Loss of ±9766m^2 of Terrestrial CBA and protected vegetation
- Increased habitat fragmentation
- Potential loss of heritage resources
- Minor construction-related impacts such as noise, dust, and potential temporary disturbance to local fauna.
- General waste from construction site camp
- Possible sedimentation resulting from the stockpiling of construction materials and use of fill material
- Generation of general waste
- Consumption of resources (electricity)

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

Refer to Appendix B2.

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

ALTERNATIVE 2 - PREFERRED ALTERNATIVE		
IDENTIFIED IMPACTS	**SIGNIFICANCE PRE MITIGATION**	**SIGNIFICANCE POST MITIGATION**
CONSTRUCTION PHASE		
Loss of high and medium sensitivity natural habitat – Botanical	Low to Medium (-)	Low to Medium (-)
Loss of high and medium sensitivity natural habitat - Faunal	Low to Medium (-)	Low (-)
Negative impacts on Cultural Heritage	Low (-)	Low (-)
Negative impacts on Archaeological Resources through earth works and excavations	High (-)	Low (-)
Negative impacts on Paleontological Resources through earth works and excavations	Low (-)	Low (-)
Socio-economic impacts – Temporary job creation and stimulation of the local economy	Low (+)	Low (+)
OPERATIONAL PHASE		
Loss of the current high level of ecological connectivity across the study area and changes to natural ecological processes - Botanical	Low to Medium (-)	Low to Medium (-)
Loss of the current high level of ecological connectivity across the study area and changes to natural ecological processes - Faunal	Low to Medium (-)	Low (-)
Negative impacts on Cultural Heritage	Low (-)	Low (-)
Negative impacts on Archaeological Resources through earth works and excavations	Low (-)	Low (-)
Negative impacts on Paleontological Resources through earth works and excavations	Low (-)	Low (-)
Socio-economic impacts – job creation and stimulation of the local economy	Low (+)	Low (+)
DECOMMISSIONING AND CLOSURE PHASE		
Potential impact and risk	No impacts have been identified as the proposed development will not be decommissioned in the foreseeable future.	

ALTERNATIVE 1		
IDENTIFIED IMPACTS	**SIGNIFICANCE PRE MITIGATION**	**SIGNIFICANCE POST MITIGATION**
CONSTRUCTION PHASE		
Loss of high and medium sensitivity natural habitat – Botanical	Medium – High (-)	Medium – High (-)
Loss of high and medium sensitivity natural habitat - Faunal	Medium (-)	Low - Medium (-)
Negative impacts on Cultural Heritage	Low (-)	Low (-)
Negative impacts on Archaeological Resources through earth works and excavations	High (-)	Low (-)
Negative impacts on Paleontological Resources through earth works and excavations	Low (-)	Low (-)
Socio-economic impacts – Temporary job creation and stimulation of the local economy	Low (+)	Low (+)

OPERATIONAL PHASE		
Loss of the current high level of ecological connectivity across the study area and changes to natural ecological processes - Botanical	Low – Medium (-)	Low to Medium (-)
Loss of the current high level of ecological connectivity across the study area and changes to natural ecological processes - Faunal	Low - Medium (-)	Low (-)
Negative impacts on Cultural Heritage	Low (-)	Low (-)
Negative impacts on Archaeological Resources through earth works and excavations	Low (-)	Low (-)
Socio-economic impacts – job creation and stimulation of the local economy	Low (+)	Low (+)
Socio-economic impacts – job creation and stimulation of the local economy	Low (+)	Low (+)
DECOMMISSIONING AND CLOSURE PHASE		
Potential impact and risk	No impacts have been identified as the proposed development will not be decommissioned in the foreseeable future.	

ALTERNATIVE 3 – NO-GO	
IDENTIFIED IMPACTS	**SIGNIFICANCE**
Loss of high and medium sensitivity natural habitat - Botanical	Neutral
Loss of high and medium sensitivity natural habitat - Faunal	Neutral
Negative impacts on Archaeological and Paleontological Resources through earth works and excavations	Neutral

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

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

All the impact management outcomes recommended by the Botanical, Faunal and Heritage Specialists, as listed in question 2.2 below, will be included in the EMPr (Appendix H).

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

- All mitigation measures outlined by specialists must be implemented:

BOTANICAL MITIGATION:

- No gardening should be allowed on any of the development plots/erven, in order to reduce development footprints and impacts, and purchasers should instead keep undisturbed as much of the high diversity natural vegetation on each plot as possible.
- Any approved development and road footprints should be clearly demarcated (by temporary fencing) on site prior to any development. No disturbance of natural vegetation outside of these demarcated areas should be allowed, either during construction or thereafter.
- A minimum 5m buffer of natural vegetation must be maintained between the outer boundary of all mapped areas of High sensitivity and any development or disturbance.
- Any listed invasive alien plant species should be removed from the site (none evident currently) on an annual ongoing basis, using approved methodology. The main invasive species on the Romansbaai Estate are rooikrans (*Acacia cyclops*) and manitoka (*Myoporum serratum* and *M. tenuifolium*).

- Search and Rescue of all translocatable bulbs (geophytes, notably the Near Threatened Babiana nana) and any other translocatable species should be undertaken from the approved development footprints prior to construction. This should be done at the end of the flowering season for the relevant species (ranges from April to October) and must be undertaken by horticulturists familiar with the rescue and growing on of the species in the area. Material should be translocated to other parts of the property where it will not be disturbed in future, and which is ecologically similar. Alternatively rescued material could be kept in a nursery and then used on site for rehabilitation of any disturbed areas once all development is complete.
- Only locally indigenous Strandveld plant species noted in this report should be used for any rehabilitation of disturbed areas or landscaping/gardening on the greater study area.
- A conservation contribution of R 500 000 will be made available for alien clearing in the Walker Bay Conservancy (WBC) this will act as an "offset" for the loss of Overberg Dune Strandveld vegetation to which alien vegetation is the primary threat. The NGO, Grootbos Foundation, will implement the clearing works. The selected area to be cleared inside the WBC will be mutually agreed upon between the NGO and the Applicant before the funds are transferred. This is a voluntary contribution (based on the Botanical Specialists recommendation) and not a mandatory requirement in terms of the offset regulations.

FAUNAL MITIGATION:

- Development footprints of the residential houses are to be kept to a minimum, without gardens, retaining a large amount of natural vegetation, including linking the development site into ecological corridors of the neighbouring Romansbaai Estate.
- Burger et al. (2006) and Harrison (2006) in their faunal assessments for the neighbouring Romansbaai Beach & Fynbos Estate listed a number of practical and detailed conservation and mitigation measures. These must be considered and undertaken for the proposed development. These have been included in the EMPr where applicable.
- A search-and-rescue operation for the Southern Adder to be undertaken prior to construction beginning.
- Reduce Light Pollution:
    - Fixtures on lights to cover the light bulb and direct the light to where it is needed.
    - Use timers and sensors to control when lights are on and to make lights motion activated.
    - Use coloured lights, such as long wavelength amber and red lights. Yellow illumination lights have also been shown to attract less moth specimens. Filtered amber LED lamps with no blue and minimal green light content to be used for outdoor lighted areas.
    - An outdoor lighting plan should be considered that includes an overall reduction of nocturnal lighting.

HERITAGE MITIGATION:

- Pro-active sampling excavations of the areas with surface scatter take place under a workplan approval from HWC. This can take place as a condition of approval.
- Archaeological monitoring of all construction excavations takes place
- A Conservation Management Plan is drafted for the ongoing management of the shell midden deposits
- Chance Fossil Finds Protocol: A Chance Fossil Finds Protocol should be integrated into the Environmental Management Programme (EMPr). This protocol will guide construction personnel on the steps to take in the event of an unexpected fossil discovery.

GENERAL:

- The Environmental Management Programme (Appendix H) be approved and implemented (which addresses all the mitigation measures outlined in this report).
- An Environmental Control Officer (ECO) must be appointed to monitor compliance and implementation of the approved EMPr, mitigation measures outlined in Appendix J, and all Environmental Authorisation conditions.
- All requirements in terms of the National Water Act must be met.

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

The proposed development should be authorised for the following reasons:

- The development is situated inside the Urban Edge and has been earmarked for development and densification of the town of Gansbaai.
- The site is situated adjacent to the existing Romansbaai Beach & Fynbos Estate. The new private road will be accessed via the internal road infrastructure of the Romansbaai Estate. The proposed rezoning, subdivision and subsequent development can be interpreted as an extension of the existing Romansbaai Beach & Fynbos Estate who has confirmed that sufficient services are available through the existing estates infrastructure.
- The preferred alternative, developed in consultation with the EAP and Specialists, includes detailed construction and operational guidelines. These measures ensure that potential ecological impacts will be effectively managed, mitigated, and monitored.
- All identified impacts can be successfully mitigated, with minimal residual effects on the environment when proper management measures are implemented.
- The proposed development supports local economic growth by creating employment opportunities, albeit limited, in the short (construction) and long term (operational).
- According to the Heritage Specialist: "*This development is located far outside of the historic core of Gansbaai, and is separated from the historic core by the existing Romansbaai Beach and Fynbos Estate. As such, while this development does not speak to the historic core of Gansbaai, it does align with the existing layout of the adjacent (linked) estate and as such, would be viewed as an extension of this estate*."
- Furthermore, "*on condition that the recommended test excavations take place, archaeological monitoring of all construction excavations takes place and that a Conservation Management Plan is drafted for the ongoing management of the shell midden deposits, there is no objection to the proposed development from an archaeological perspective*." "*The specific geological context and the nature of the proposed development suggest that the overall impact on palaeontological heritage is expected to be LOW*." There is therefore no objection to the proposed development from a heritage perspective on condition that mitigation measures proposed are implemented.
- According to the Faunal Specialist, overall, the proposed development is unlikely to generate significant negative impacts on any of the faunal SCC flagged once mitigation is followed. It is the specialists' opinion that the proposed development will have an overall low significance on the faunal SCC flagged (after mitigation).
- According to the Botanical Specialist the construction phase (and operational Phase) botanical impacts are Low - Medium negative after mitigation (Preferred Alternative). The primary proposed mitigation is avoidance of all areas mapped as High sensitivity, which has been achieved through the Preferred Alternative.
- The landowners have demonstrated a commitment to conserving the remaining undeveloped portions of the property.

The following conditions should be included in the Environmental Authorisation:

- All mitigation measures and management requirements outlined in the Environmental Management Programme (EMPr) (Appendix H), including its Appendices must be implemented in full.
- All specialist recommendations and mitigation measures contained within the following reports must be implemented in full:
    - Heritage Impact Assessment (Appendix G3)
    - Faunal Sensitivity Assessment (Appendix G2)
    - Botanical Impact Assessment (Appendix G1)
- No expansion of the development footprint beyond the approved area may occur without prior environmental authorisation.

2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.
	Faunal Assessment: • It is assumed that all third-party information used (e.g. GIS data and species historical records) was correct at the time of generating this report. • The site was visited during autumn (late-May 2024). Seasonality is not considered as important as this site sensitivity assessment relied on surveying and assessing broad habitat features and utilising ecosystem-level data, such as intact vegetation type, and known habitat and distributional records for the faunal SCC.

	• This scoping assessment was undertaken based on the information provided to date by PHS Consulting for the proposed development. Botanical and Terrestrial Assessment: • The site was visited on 29 May 2024. This was early in the optimal winter – spring flowering season in this mainly winter rainfall area, and thus only about a third of the likely geophytes and annuals were evident or identifiable (apart from the autumn flowering *Oxalis* and *Brunsvigia*), whilst almost all perennial plants were identifiable. There were thus some seasonal constraints on the accuracy of the botanical findings but given the heavy dominance of perennials in this area – which can be used as indicators of habitat sensitivity - the confidence in the accuracy of the botanical findings is fairly high. The author has undertaken extensive work within the region (including on site in 2005-2006, and on two adjacent sites in 2024), which facilitates the making of local and regional comparisons and inferences of habitat quality and conservation value. • The study area was walked, and all plants on site were noted. Photographs of certain plant species were made (using a Fuji mirrorless SLR camera) and uploaded to the inaturalist.org website. Satellite imagery dated May 2023 (and earlier) was used to inform this assessment, and for mapping. It is assumed that all the natural vegetation in the development footprints (erven and roads) will be permanently lost. The vegetation in some of the disturbed areas alongside erf building footprints and the road is likely to be lost during construction, but many species will return in these areas over time (5-10yrs). • The botanical sensitivity of a site is a product of plant species diversity, plant community composition, rarity of habitat, degree of habitat degradation, rarity of species, ecological viability and connectivity, restorability of habitat, vulnerability to impacts, and reversibility of threats. Heritage Assessment: • The significance of the sites and artefacts is determined by means of their historical, social, aesthetic, technological and scientific value in relation to their uniqueness, condition of preservation and research potential. It must be kept in mind that the various aspects are not mutually exclusive, and that the evaluation of any site is done with reference to any number of these. • It should be noted that archaeological and palaeontological deposits often occur below ground level. Should artefacts or skeletal material be revealed at the site during construction, such activities should be halted, and it would be required that the heritage consultants are notified for an investigation and evaluation of the find(s) to take place. • The dense vegetation complicated surveying as some areas were inaccessible, and visibility of the surface was limited, however, sufficient coverage was ascertained in order to determine the archaeological sensitivity of the development area.
2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.
EA is required for 10 years, completion within five years after commencement of construction, post construction monitoring 2 years after completion of entire development.	

3. Water

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.
The following Water Efficiency Measures will be implemented through the implementation of the EMPr (Appendix H) amongst others: • Ensure that only water efficient devices such as low-flow taps, low-flow showerheads, washing machines and dishwashers are used. • Ensure that all toilets are low volume (9.5 litres or less), with dual-flush or multi-flush.

- Ensure that outside taps and showers are fitted with metering tap buttons, which have set timers to prevent taps being left on or dripping.
- Design the layout of the plumbing system to avoid long pipe runs between the geyser and supply points.
- Reduce hard surfacing to encourage rainwater to seep back into the ground.
- Design paved areas so that water run-off is slowed down and where possible use soak-aways and permeable paving that allows water to filter into the ground.
- Ensure that the optimum pipe size and water pressure is used. A pressure reducing valve can be installed at a point nearest to where the supply enters the building to ensure that all water supplies in the building are balanced.
- Ensure all dwellings are harvesting rainwater and encourage the re-use of grey water where appropriate. However, ensure that the local ecological system is not polluted and that it is managed correctly.
- Ensure the use of indigenous planting and efficient irrigation methods, such as drip irrigation.

4. Waste

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

Suitable waste management measures have been outlined within the site EMPr (Appendix H):

Construction Phase:

- An integrated waste management approach should be undertaken in which the generation of waste is firstly avoided as far as possible, then reduced, reused, recycled and finally disposed of.
- Multiple secured (water tights and windproof) onsite bins with weighed down lids that effectively contain waste must be provided onsite. Food waste and recyclables must be separated on site through use of clearly labelled bins for the various categories (food, paper, glass, plastic, etc.).
- Where necessary, skips must be provided onsite to collect large construction waste.
- All bins and skips must be located within the development footprint, must be protected from wind disposal, and must be easily accessible.
- All bins and skips must be regularly emptied; waste must be appropriately disposed of at registered offsite waste disposal site and recyclables must be dropped off at a collection point for recycling. Waste slips must be obtained as proof and suitably filed.
- All onsite labour must be appropriately educated on environmental awareness and handling of waste products.
- Littering is prohibited and appropriate signage must be put up to remind workers.
- Burning or burying of waste onsite is not permitted.
- All waste bins/ skips should be covered to discourage scavenger animals/ birds.

Operational Phase:

- Implementation of a domestic recycling system is encouraged.
- All domestic waste must be appropriately disposed of at a registered offsite waste facility and/or recycling collection point.
- Burning of burying of waste onsite is not permitted.
- All waste bins/ skips should be covered to discourage scavenger animals/ birds

5. Energy Efficiency

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

Reducing the energy consumption of a building not only saves the environment but will also save on the running costs of the building. By designing energy efficient or renewable energy options into a building, the demand for electricity during peak consumption times is reduced. The following Energy Efficiency Measures will be implemented (through the implementation of the EMPr (Appendix H)):

- Solar Energy is to be utilised where possible to supplement electricity.
- All dwellings are to be built in accordance with the "NHBRC Guidelines for Building an Energy Efficient Home".
- The following energy efficiency recommendations will be implemented:
    - Install properly insulated ceilings.

- Place and size windows to make optimal use of natural light, winter heating and ventilation without creating draughts or gaining too much heat in summer or losing heat in winter.
- Avoid the use of air conditioning or at least ensure that the correct size is installed and that use of the unit is minimised.
- Use air conditioners with a seasonal energy efficiency ratio of 10 or more (ratio of the seasonal energy output to the seasonal energy input).
- Ensure that the building is constructed so as to be tightly sealed, to prevent unwanted air flows. Doors and windows must be appropriately sized and fitted with seals.
- Energy efficient electrical installations must be used.
- Ensure that artificial lighting is designed so that light is focused where necessary, such as brighter areas where tasks are being performed and more ambient light elsewhere.
- Avoid the use of outdoor 'up-lighting' to reduce light pollution.
- Ensure that energy efficient light bulbs, such as CFLs or LEDs, are used.
- Reduce the electrical energy used to heat water by installation of solar water heaters, or at least geyser blankets, pipe insulation and a geyser timer.

SECTION K: DECLARATIONS

DECLARATION OF THE APPLICANT

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

I……**David Mostert**……., ID number …**6202145055089**…in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;

- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;

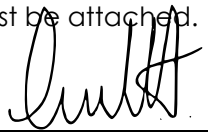
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;

- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;

- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
  - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - Legitimate costs in respect of specialist(s) reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;

- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

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



14 October 2026

Signature of the Applicant: Date:

DANGER POINT ECOLOGICAL DEVELOPMENT COMPANY PTY LTD

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I **Jenna Theron**, EAP Registration number **2022/5926** as the appointed EAP hereby declare/affirm the correctness of the:

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



13 October 2026

Signature of the EAP: Date:

PHS CONSULTING

Name of company (if applicable):

DECLARATION OF THE SPECIALIST

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

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

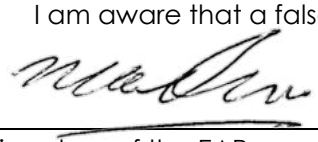
- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or

  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);

- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;

- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and

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



7 June 2026

Signature of the EAP: Date:

Nick Helme Botanical Surveys

Name of company (if applicable):

DECLARATION OF THE SPECIALIST

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

I ……**Jonathan Colville**……, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or

  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);

- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;

- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and

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



05/06/2026

Signature of the Specialist: Date:

Name of company (if applicable): **Jonathan Colville Terrestrial Ecologist & Faunal Surveys**

DECLARATION OF THE SPECIALIST

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

I ……**Callan Cohen**……, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

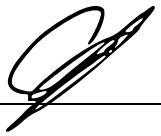
- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or

  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);

- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;

- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and

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



4 June 2026

Signature of the Specialist: Date:

Name of company (if applicable): **Birding Africa**