water & sanitation
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REPUBLIC OF SOUTH AFRICA

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WATER USE LICENCE APPLICATION SUMMARY REPORT IN TERMS OF SECTION 21 (C), (E), (I) AND (F) ON PORTION 29 OF FARM 794, SOMERSET WEST (WU52403)

NAME OF APPLICANT: *TSOGO SUN CALEDON (PTY) LTD*

Compiled by
PHS Consulting

PHS CONSULTING

Date: October 2026

1. Applicant details

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2. Person submitting application

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Qualifications: *BSc; BSc (Hons) Geology; MSc Water Resource Management*
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3. Background and purpose

3.1 Background

Tsogo Sun Caledon owns Portion 29 of Farm 794, Stellenbosch Road, Somerset-West. The applicant is developing a casino and hotel. This water use application is for a S21(c) and (i), and (e) and (f) for a package Wastewater Treatment Plant (WWTP), irrigation with treated effluent and discharge of surplus treated effluent downstream, within the regulated area of the mapped wetland area on site. The new package WWTP is proposed to treat sewage

from the development until capacity becomes available within the City of Cape Town's Macassar Wastewater Treatment Works, estimated as 2031, after which the package WWTW will be mothballed. The proposed on-site WWTP, comprising a BIOSUB™ Treatment System, is designed to treat an average of 135m^3 of wastewater per day. The treated wastewater will be used for irrigation of landscaping on site, with any surplus discharged downstream.

This application falls within the jurisdiction of the Breede-Olifants Catchment Management Area (BOCMA).

This water use application is for a S21(c) and (i) for the construction of the package WWTP and its associated pipelines within the regulated area of the mapped wetland on site. A Section 21(e) for the use of treated effluent from the WWTP for irrigation of landscaped areas and Section 21(f) for the discharge of unused treated effluent is included. A Wetland Rehabilitation and Maintenance Management Plan is also included for consideration.

3.2 Location of water uses

The proposed site is located in the Western Cape Province, within the Cape Town Magisterial district in Somerset West (Figure 1). The water use will take place on Portion 29 of Farm No. 794 (SG code: C06700000000079400029) within the City of Cape Town (CoCT) Municipality. The property falls within the G22J quaternary catchment of the BOCMA. The geographic location at the property where the water uses will take place is 34° 4'53.50"S 18°49'44.02"E.

Table 1: Property details

Property description	Title Deed number	Owner
Portion 29 of Farm No. 794 (SG code: C06700000000079400029)	T23248/2019	Tsogo Sun Caledon (Pty) Ltd

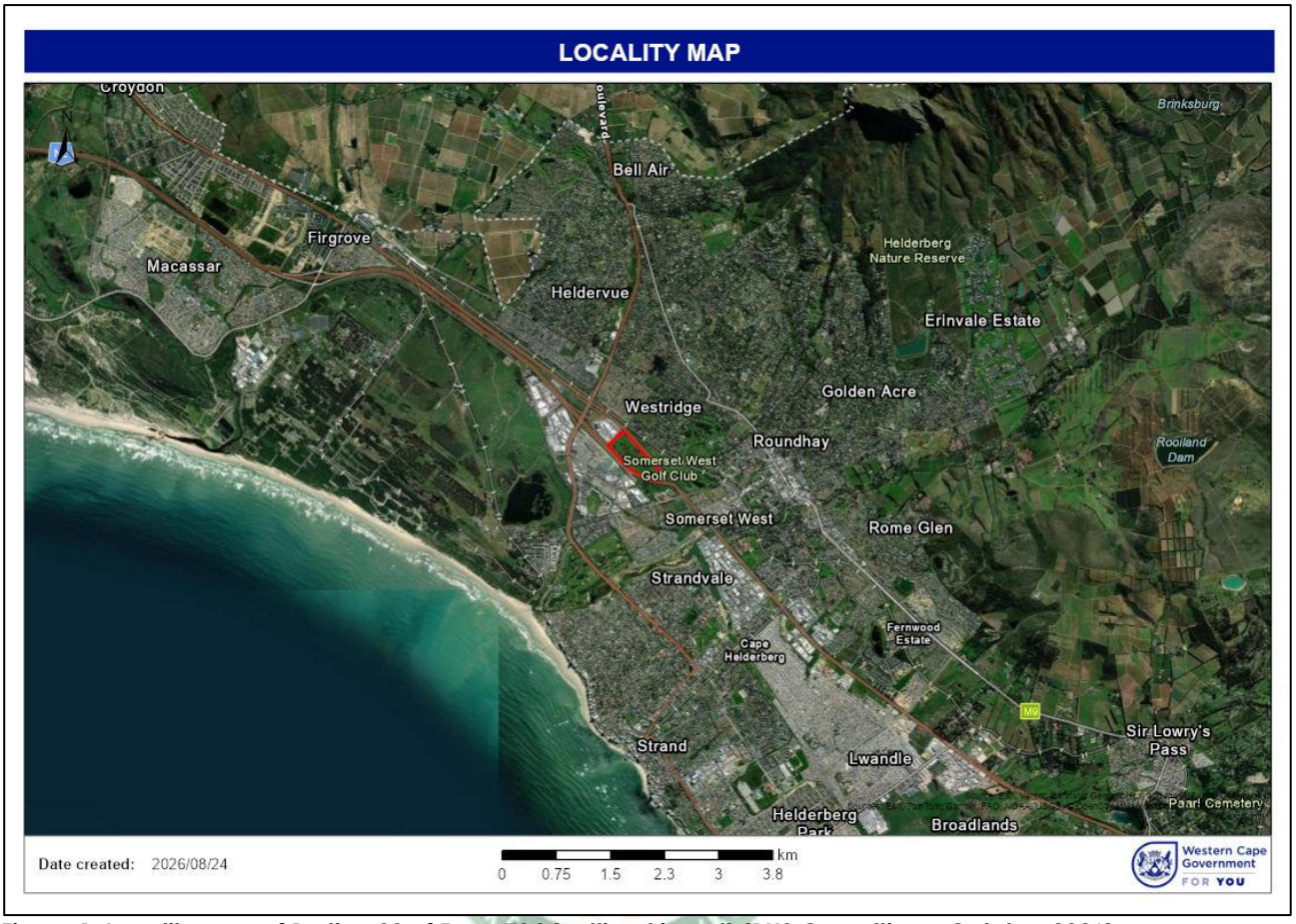


Figure 1: Locality map of Portion 29 of Farm 794 (outlined in red) (PHS Consulting – October 2026).



Figure 2: Location of mapped wetland (in green) and outline of infrastructure in white. Sewage pumpstation, downstream discharge point and package plant location indicated by red pin (PHS Consulting – October 2026)

4. Administrative documents and other technical reports submitted to support the WULA

4.1 Administrative documents (to be submitted as part of online application)

- Proof of Payment of Application fee
- Copy of ID of company's representative
- Company Registration Certificate
- Copy of Title Deed
- Section 27 Motivation
- Consultant Appointment Letter – Power of Attorney

4.2 Reports and other technical documents

Table 2: List of reports and other technical documents to be submitted

Number	Report Title	Compiled by	Date of report
1	Freshwater Impact Assessment	EverWater – Jeanne Snyman	May 2026 (Updated August 2026)
2	Stormwater Management Plan	Bigen Africa Services – Henrico du Toit	April 2026
3	Botanical Survey	Capensis – Paul Emms	May 2026
4	Wetland Rehabilitation and Maintenance Management Plan	EnviroSwift – Nick Steytler	July 2026
5	Landscape Plan	Landmark Studios	July 2026
6	Site Development Plan	Nsika Architecture	March 2026
7	BioSub STP User Manual	Water and Wastewater Africa	N/A

5. Project Description

The proposed development entails the establishment of the Signature Hotel and Casino on Portion 29 of Farm 794, Somerset-West on land previously used as part of the Somerset West golf course. The proposal includes the construction of the following infrastructure:

- Basement under casino box
- Casino
- Retail area in casino box i.e. restaurants
- Conference area in casino box
- Hotel and Villas

- Long stay apartments, spa and restaurant
- Increased stormwater retention at Pond 2
- Waste Water Treatment Package Plant and Pump Station
- Guard houses at entrances to the site.

The current municipal sewerage system cannot accommodate the sewerage expected to be produced by the proposed development. The system is expected to be upgraded in 2031. As an alternative, until the municipal system is upgraded, part of the proposed development is a Wastewater Treatment Plant (WWTP). The WWTP is to be designed and installed by Water & Wastewater Africa. Their trademarked *BioSub Advanced* treatment system will be utilized with the treated effluent quality to comply with Special Limits (GN 665 of 2013 – see Table 7). The proposed location is adjacent to the existing municipal gravity sewer, on the eastern part of the property, adjacent to the N2 and outside of the regional attenuation pond (see SDP attached – Appendix 6). The location allows for easy bypass as required by CoCT as well as seamless transition should the WWTP be taken out of commission at some point. Note that the WWTP is expected to be decommissioned in 5 years, when CoCT is able to receive the site's effluent into its formal sewerage system.

The treated effluent from the WWTP will be used for irrigation and any excess will be discharged and will comply with the DWS Special Limits (GN 665 of 2013 – see Table 7). Wastewater will be pumped from the pump station (see Figure 2 and attached SDP – Appendix 6), to the WWTP and then treated effluent will be transported back towards the main building where it will either be used for irrigation or discharged downstream. The untreated and treated sewage pipelines will be physically separated from the wetland complex by the embankment.

Water & Wastewater Africa's BioSub is a multi-compartment biological wastewater treatment system designed to maximise treatment efficiency through controlled hydraulic flow and biological activity. A series of internal baffles directs wastewater through the reactor in an alternating up-flow and down-flow pattern, ensuring intimate contact between the wastewater and the active biomass responsible for treatment. The biomass, consisting primarily of naturally occurring microorganisms such as bacteria, breaks down biodegradable organic and inorganic pollutants into environmentally acceptable end products. As wastewater continuously enters the system, the microbial population grows and adapts to the incoming load, enhancing treatment performance over time. The baffle

arrangement promotes effective mixing and contact between the wastewater and biomass while minimizing the loss of biological solids from the reactor. The system has the capacity to treat 5m^3 to 500m^3 wastewater per day, but this specific design is for 135m^3/day. The entire process is summarised in Figure 3.

Solids are collected in the Septic Zone and removed on an ad hoc basis with a vacuum tanker and disposed at the nearest municipal wastewater treatment works. The vacuum tanker contractor will provide a waste manifest for each disposal.

The BioSub Advanced model incorporates advanced membrane (comprising Ultrafiltration and Reverse Osmosis) and oxidation technologies to produce highly purified water suitable for a wide use of applications and compliance with the Special Effluent Discharge Limits. Figure 4 illustrates the construction and process of the Advanced model.

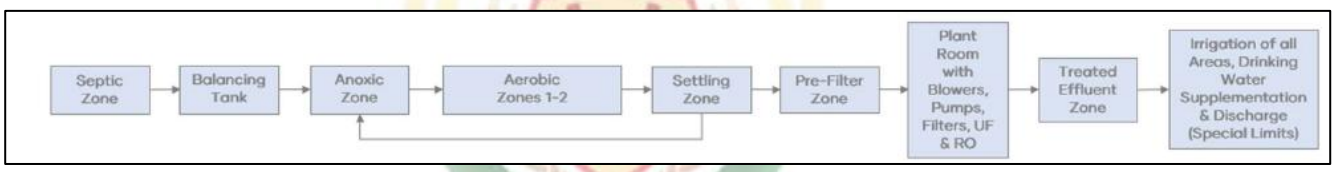


Figure 3: Flow diagram summarising wastewater treatment process of *BioSub Advanced* Model (BioSub STP User Manual - Water and Wastewater Africa).

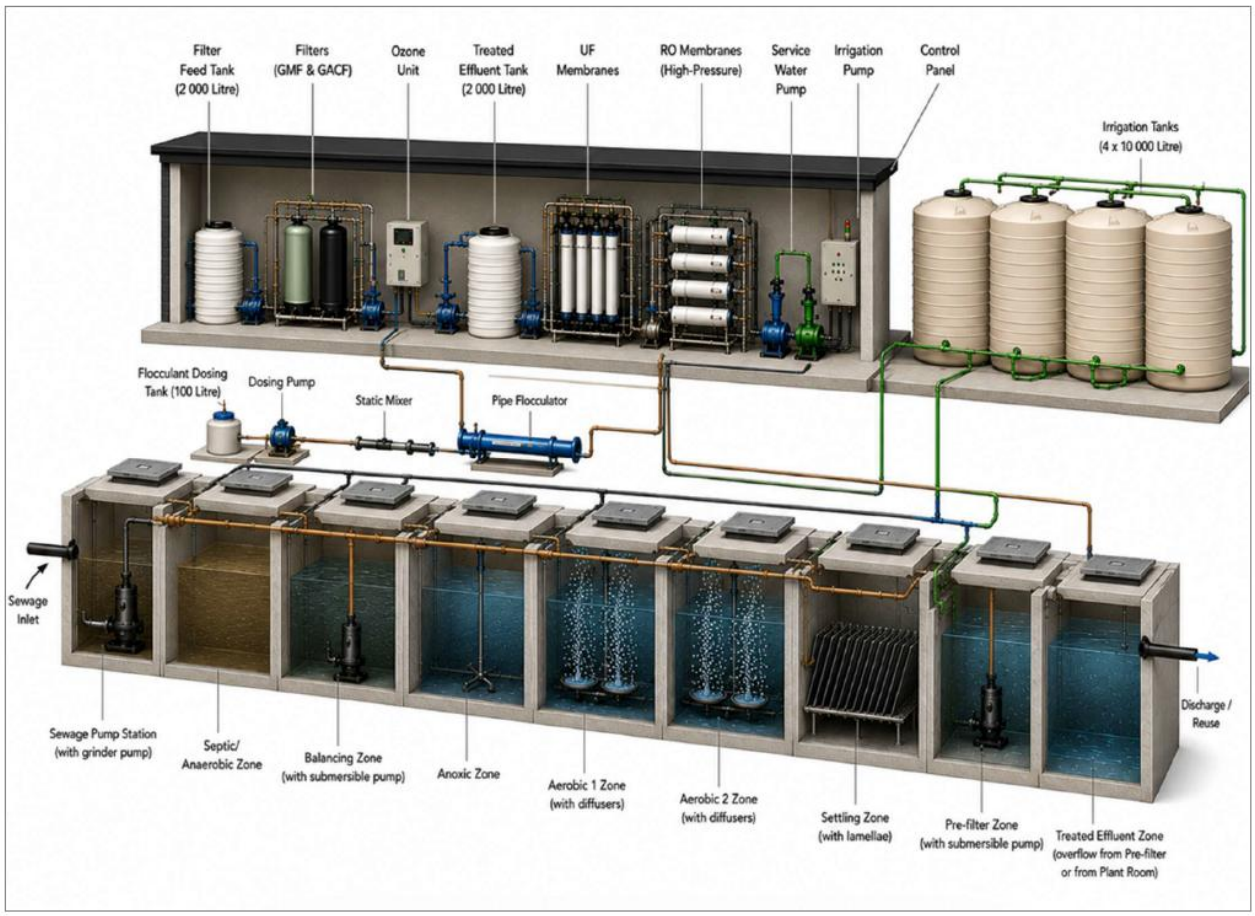


Figure 4: Diagram illustrating the system structure and water purification system of the *BioSub Advanced* system (BioSub STP User Manual - Water and Wastewater Africa).

Treated wastewater will be used to irrigate approximately 17 850 m² of landscaped areas that form part of the Casino Hotel and Complex (see attached Landscaping Plan by Landmark – Appendix 5). Any treated effluent that is unused will be discharged at the discharge point (Figure 2) into the municipal stormwater system.

The irrigation system has been designed to maximise water saving through two key methods. The system is equipped with a rain sensor that stops the irrigation cycle when there is rain, and the system is pre-programmed to adjust to seasonal water cycles. This system allows for up to 50% water saving. The irrigation volumes are divided between establishing and mature landscapes. During the establishing phase (1-2 years) the annual predicted usage with the water saving system is 39 441m^3. Once the landscape is established (mature) the predicted water usage with the water saving system is 11 880m^3. The proposed development will include the construction of 21 500L rainwater tanks in the basement on the south-eastern end of the Casino (see Figure 5 below).

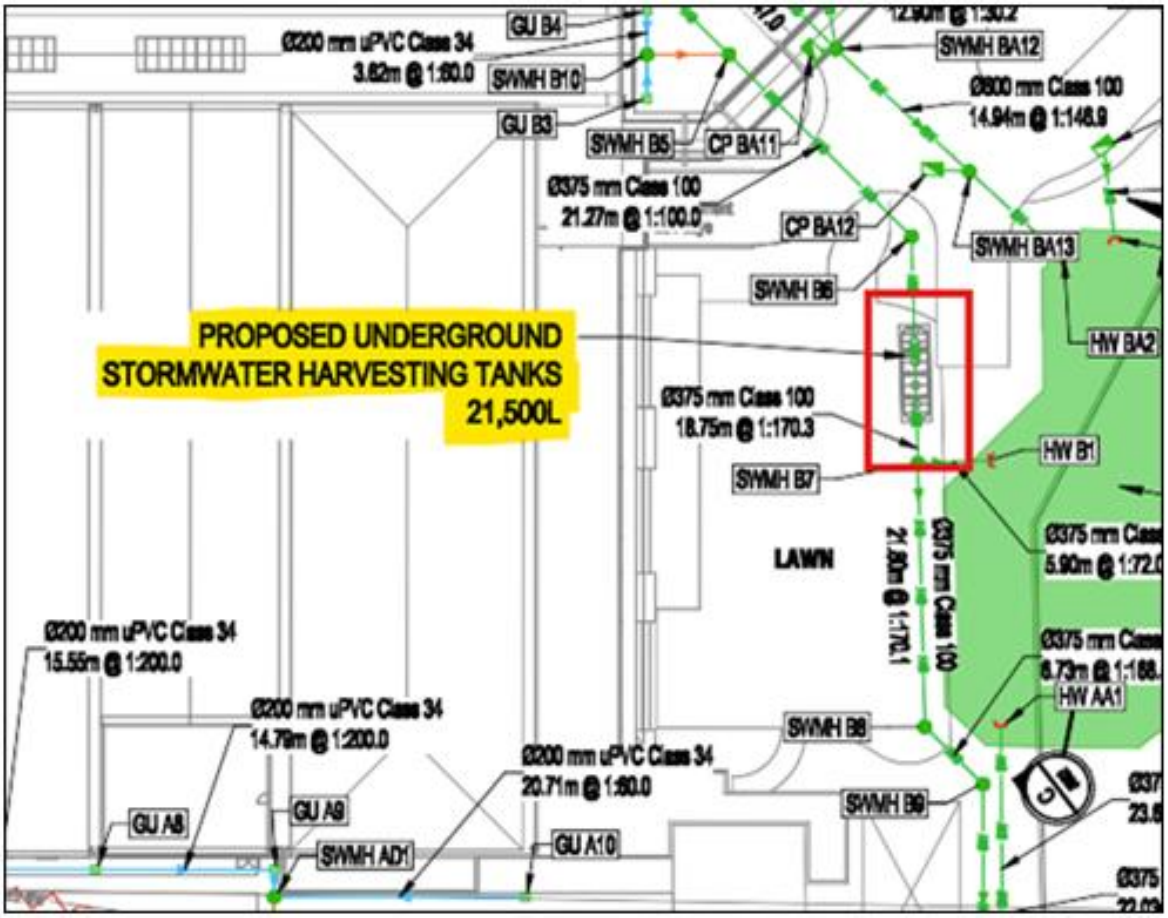


Figure 5: Extract from SDP showing location of rainwater harvesting tanks in the basement of the casino (Nsika Architecture - March 2026)

A Wetland Rehabilitation and Maintenance Management Plan (WRMMP) has been compiled for the rehabilitation of the Wetland Complex (see site description below and attached reports). The WRMMP has four main goals in order to improve the wetland's Present Ecological State:

- Minor bank reshaping to reduce the slope of channels and banks;
- Eradication of alien invasive species from the site;
- Revegetation with suitable indigenous plants; and
- Long term maintenance and management of the planted wetland vegetation, ongoing eradication of alien invasive plants, control of *Typha capensis* and removal of excess sediment and debris/solid waste from channels, culverts and other stormwater infrastructure associated with the wetland system and located within the site.

In 2018, BOCMA confirmed that the development including the Stormwater Retention Pond would require a 21(c) and (i) General Authorisation, which was subsequently registered and is show in the current WARMS.

Since 2018 it has been determined that a Wastewater Treatment Package Plant is needed which has led to this current WULA application.

6. Water Uses applied for

This application includes the following water uses as detailed in Table 3 and illustrated in Figure 2 above.

Table 3: Water Uses applied for

Water use(s) activities	Purpose	Capacity/ Volume (m^3/annum)	Property Description	Co-ordinates
Section 21(c)				
Activity taking place within regulated area	Wastewater Treatment plant (WWTP)	NA	Portion 29 of Farm No. 794	34° 5'2.60"S 18°49'49.91"E
	Pipeline - untreated	NA	Portion 29 of Farm No. 794	34° 4'53.50"S 18°49'44.02"E
	Pipeline - treated	NA	Portion 29 of Farm No. 794	34° 4'53.50"S 18°49'44.02"E
	Pump station	NA	Portion 29 of Farm No. 794	34° 4'54.73"S 18°49'37.42"E
Section 21(e)				
Irrigation with treated wastewater	Treated effluent from the WWTP will be used to irrigate landscaped areas of 1.785ha size	11 883	Portion 29 of Farm No. 794	34° 4'53.50"S 18°49'44.02"E
Section 21 (i)				
Activity taking place within regulated area	Wastewater Treatment plant (WWTP)	NA	Portion 29 of Farm No. 794	34° 5'2.60"S 18°49'49.91"E
	Pipeline - untreated	NA	Portion 29 of Farm No. 794	34° 4'53.50"S 18°49'44.02"E
	Pipeline - treated	NA	Portion 29 of Farm No. 794	34° 4'53.50"S 18°49'44.02"E
	Pump station	NA	Portion 29 of Farm No. 794	34° 4'54.73"S 18°49'37.42"E
Section21(f)				

Water use(s) activities	Purpose	Capacity/ Volume (m^3/annum)	Property Description	Co-ordinates
Discharging of treated effluent	Treated effluent not used for irrigation will be discharged downstream	37 392	Portion 29 of Farm No. 794	34° 4'56.30"S 18°49'38.26"E

7. Description of the Environment

Site Description

The proposed Signature Casino and Hotel lies within the City of Cape Town Metro, between the N2 and the R102, and is approximately 22ha in extent. The project area falls within the larger Lourens River Catchment, specifically within Quaternary Catchment G22J, which forms part of the Berg Water Management Area.

The project site originally formed part of the Somerset West Golf Club, consisting of several fairways and stormwater ponds that originally formed part of the broader stormwater management system. According to the National Land Cover Map, the new development will largely fall over an area classified as Urban Recreational Fields (Grass).

Other significant landscape features include the Lourens River, located approximately 1.7km southeast of the site, which discharges into the Atlantic Ocean just North of Melkbaai. Furthermore, the Somerset West region is bordered by the Hottentots Holland Mountain Range, with the Helderberg situated to the far northeast of the site (see Figure 6 below).

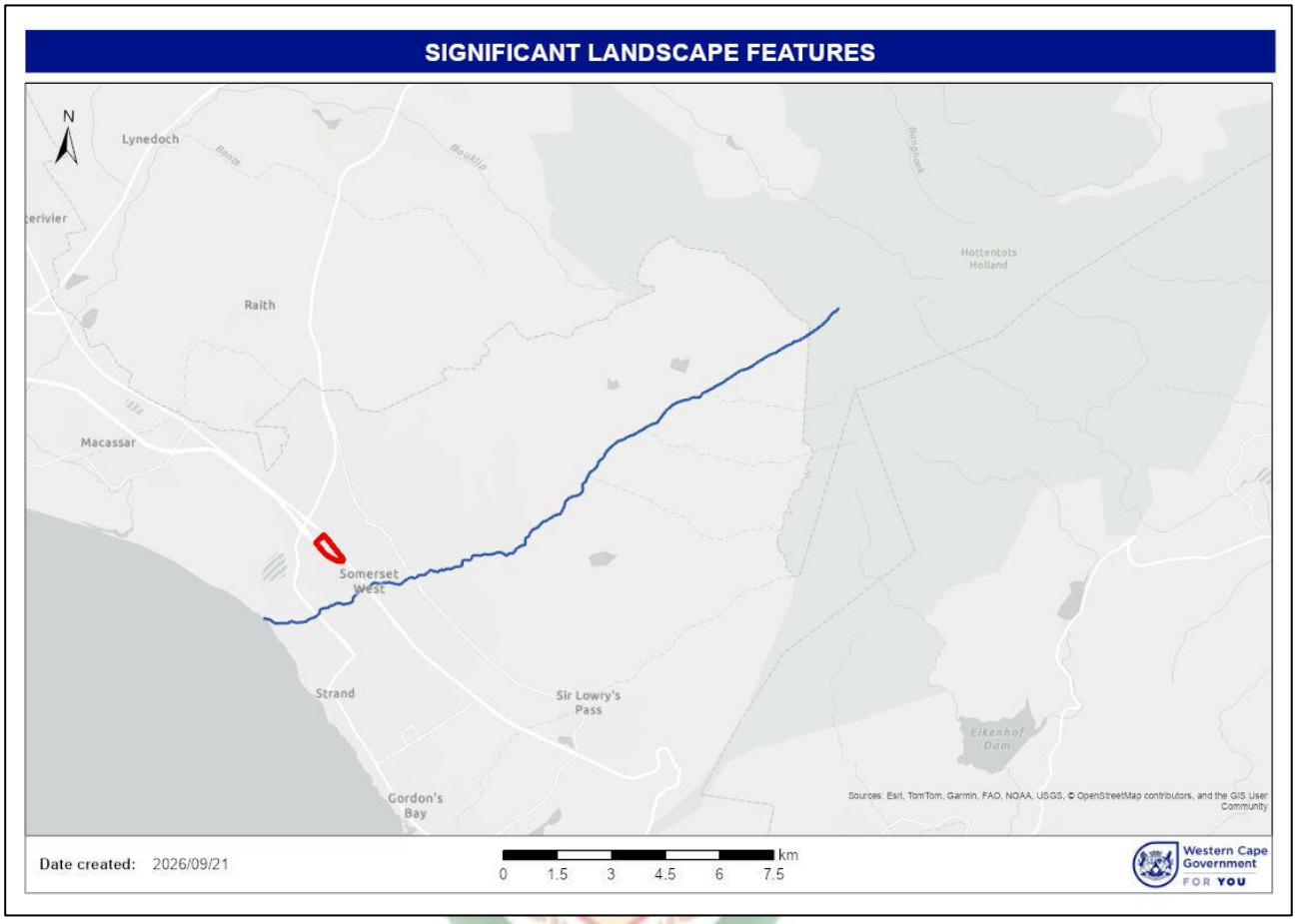


Figure 6: The site (red outline) in relation to significant landscape features – Lourens River (blue line) and Hottentots Holland Mountain Range.

Vegetation

The 2026 botanical screening assessment of Portion 29 of Farm 794 confirms that the site is highly transformed and degraded. The majority of the approximately 22ha study area consists of old golf fairways, ponds, and drainage lines that are no longer maintained, and the site is currently heavily grazed by cattle. The vegetation is dominated by ruderal weeds, kikuyu grass (*Cenchrus clandestinus*), and kweek (*Cynodon dactylon*), with a significant infestation of invasive alien plants, particularly Port Jackson willow (*Acacia saligna*).

Although scattered indigenous species are present, these are limited to common, disturbance-tolerant elements typical of highly modified landscapes. These include:

- Bulbs such as *Pauridia aquatica, Ornithogalum thyrsoides, Oxalis flava, Oxalis purpurea*, and *Moraea flaccida.*
- Wetland-associated species such as *Typha capensis, Cenchrus caudatus*, and *Juncus capensis*.

No intact or semi-intact or even degraded examples of the historical vegetation types (Lourensford Alluvium Fynbos – Critically Endangered, Swartland Shale Renosterveld – Critically Endangered, or Boland Granite Fynbos – Endangered) remain on site. The site does not support any threatened plant species of conservation concern and falls outside the Cape Town Biodiversity Spatial Plan).

Fauna

Large groups of frogs were heard calling during the field survey, most notably the clicking stream frog (*Strongylopus grayii*). Birdlife was also evident around the wetland features, with species observed including Egyptian geese (*Alopochen aegyptiaca*) and red-knobbed coots (*Fulica cristata*). No threatened or endangered faunal species were recorded during the field assessment.

Surface Water

The site lies in the Breede-Olifants Water Management Area and is located in quaternary catchment G22J. The project area falls within the larger Lourens River Catchment (see Figure 6).

According to the National Freshwater Ecosystem Priority Areas (NFEPA) dataset (Figure 4), the broader catchment within which the project site is situated is not classified as a FEPA area, nor are any FEPA wetlands located on, or within 500m of, the site. In addition, the National Wetlands Map Version 5 (NWM5) identifies two wetlands along the south-western boundary of the property, namely a natural Depression Wetland and a Wetland Seep, both associated with the Southwest Fynbos Bioregion (Figure 7). However, the freshwater specialist concluded that these are no longer present.

The ecosystem and vegetation of the study area were assessed in its present, as well as its likely pre-expanded and historical composition. It is described in the context of the freshwater systems of the area as assessed at the beginning of the wet season, with the site visit done by the freshwater specialist on 19 May 2026. Freshwater features found within the project site included several Depressions interlinked through stormwater channels, a small Stormwater Detention pond located in the northwestern corner as well as the wet areas indicated as wetlands on the National Wetlands Map.

Considering that the Old Stormwater Pond as well as the excavated wet areas will classify as artificial wetlands, they will not require further assessment under section 21(c) and (i) water use and thus these were excluded from the freshwater assessment.

The natural depression wetland indicated by the National Wetlands Map (NWM5) along the south-eastern boundary of the site was also assessed during the field investigation. Although this wet area is clearly visible on the 1983 aerial imagery, field observations confirmed that the area has been completely transformed from its original condition. The wetland was historically infilled during the development of the former golf course, with an artificial embankment constructed along the National Road, leaving only a narrow stormwater-like feature adjacent to the boundary fence. The absence of identifiable wetland characteristics and functionality within this area resulted in the exclusion of this feature from the freshwater assessment.

The freshwater assessment thus focusses on the Depression Wetland Complex situated in the centre of the site as well as the Geelsloot stream running along the southeastern boundary of the property.



Figure 7: Satellite imagery indicating the project site with the interlinked depression complex (green polygon), the artificial stormwater pond and excavated areas (pink polygons) as well as the NWM wetland areas (turquoise polygons). (EverWater – 2026 Freshwater Report).

Depression Wetland Complex

Several depression wetlands, interlinked by stormwater canals, are situated within the central portion of the site. These depressions were most likely historically created as part of the broader Somerset West stormwater management system, receiving runoff from the upstream urban area, as well as flows diverted from the Geelsloot stream that originally flowed just south of the site (as visible on the 1938 aerial imagery – Figure 8), together with drainage from upstream wet areas.



Figure 8: 1938 aerial photography covering the property (yellow polygon) and the broader surrounding area, illustrating the two prominent wet areas (blue polygons), a possible seep feature, and the Geelsloot Stream.

The historical watercourse drains the southern slopes of the Helderberg Mountains and becomes extensively modified and canalised through the upstream urban environment. Presently, the system is conveyed through a network of highly modified stormwater canals and channels associated with the existing golf course, with portions of the flow discharging into the study area and being detained within several depression areas. This main wetland complex forms part of the Functional Wetland Area (Green polygon – Figure 7).

Furthermore, wetland conditions have expanded into what is now known as the historical attenuation pond on site, resulting in the establishment and spread of wetland conditions adjacent to the existing stormwater infrastructure. However, apart from visible water

movement, these areas support very few facultative wetland species. This portion of the site will therefore be referred to as the Artificially Wet Area (Yellow polygon – Figure 8).



Figure 9: The depression wetland complex consisting of the Functional Wetland Area (green polygon) and the Artificially Wet Area (yellow polygon), fed by the surrounding stormwater channels (orange lines) (EverWater – 2026 Freshwater Report).

Although the wetland system is considered to be constructed in origin, this feature forms part of the greater freshwater system, has naturalised over time and presently supports established wetland vegetation, hydrological functioning, and associated biodiversity. The WET-Health assessment methodology was therefore applied to evaluate the current ecological integrity and functioning of the system, with due consideration given to its artificial origin and modified historical context. See Table 4 below for the freshwater assessment findings for the depression wetland.

Table 4: Summary of key findings of the assessment of the Depression Wetland Complex (EverWater – 2026 Freshwater Report).

Depression Wetland Complex (Functional Wetland Area)			
DWA catchment		G22J	
Vegetation type		Lourensford Alluvium Fynbos (CR) or Boland Granite Fynbos (En)	
Rainfall region		Winter	
System		Inland System	
Regional Setting		Southern Folded Mountains	
Landscape unit		Plain	
Level 4: Hydrogeomorphic Unit		Depression Wetlands	
Level 4: Drainage outflow		With Channelled outflow	
Level 5: Hydrological Regime	**Inundation periodicity**	Permanently to Seasonally inundated	
	Saturation periodicity (up to 0.5m below ground level)	Both permanently and seasonally saturated zones.	
Level 6: Wetland Characteristics	**Natural vs Artificial**	Constructed (Connected to natural watercourse)	
	Vegetation cover type	Mostly herbaceous (Grasses, Sedges, Herbs) with scattered Shrubs – Mostly indigenous	
	Substratum type	Organic rich loamy soils to Clay	
Special conservational features (from desktop study)		**WCSBP (2017)**	No CBA's or ESA's on site.
		NFEPA and National Wetlands Map	Not indicated on either the FEPA or NWM5 Maps.
PES		**C/D** (Moderately to Largely modified as best attainable ecological state)	
EIS		Low to Moderate	
Ecosystem services		The Depression Complex provides a moderate level of functionality for flood attenuation, while delivering low to moderate levels of functionality for streamflow regulation, nitrate removal, carbon storage and the maintenance of biodiversity.	
RMO and REC		**RMO – C/D: Maintain; REC – C/D**	
Proposed Buffer Zone		15m	

Geelsloot Stream

The Geelsloot Stream, is a seasonal stream that drains the south-western slopes of the Helderberg Mountain and becomes extensively modified and canalised through the upstream urban environment. As mentioned, the stream is diverted through a network of highly modified stormwater canals and channels through the existing and former sections of the Somerset West Golf Course, with the main stem still flowing through the south-east corner of the site. From there it flows towards the Helderberg centre, where it is diverted around the property edge and joins the downstream stormwater system. Further downstream, the canalised stream passes through the urban area and the Strand Golf

Club before discharging into the Lourens River, approximately 400m upstream of its mouth at False Bay (see Figure 6).

The section flowing through the property, can be classified as being in a largely to seriously modified state, with a highly degraded riparian zone and large scale upstream hydrological and channel modifications. See summary of river assessment below (Table 5).

Table 5: Summary of Geesloot Stream assessment (Everwater - 2026 Freshwater Report).

	Geelsloot Stream	
DWA catchment	G22J	
Vegetation type	Lourensford Alluvium Fynbos (Critically Endangered)	
Rainfall region	Winter	
System	Inland System	
Regional Setting	Southern Folded Mountains	
Landscape unit	Plain	
Hydrogeomorphic Unit	Stream (Seasonal)	
Longitudinal zonation/Landform/	Lowland - Sand Bed	
Substratum type	Sand	
Special conservational features (from desktop study)	WCSBP (2023)	No CBA's or ESA's on site.
	NFEPA	Not indicated on either the FEPA or NWM5 Maps.
PES	D/E: Largely to Seriously modified	
EIS	Low to Very Low	
RMO and REC	RMO – E* Maintain ; REC – D *PES Categories E and F are considered ecologically unacceptable (Malan and Day, 2012) and therefore, should a freshwater resource fall into one of these PES categories, an REC class D is allocated by default, as the minimum acceptable PES category.	
Proposed Buffer Zone	N/a	

Climate

The site falls in the Western Cape winter-rainfall region, which is typically Mediterranean, with warm, dry summers and mild, wet winter (Figure 10). It received the lowest rainfall (9,9mm) in January and the highest (125,8mm) in June. The monthly distribution of average daily maximum temperatures shows that the average midday temperatures for Somerset West ranged from 16°C in July to 26°C in January/February. The region is the coldest during July.

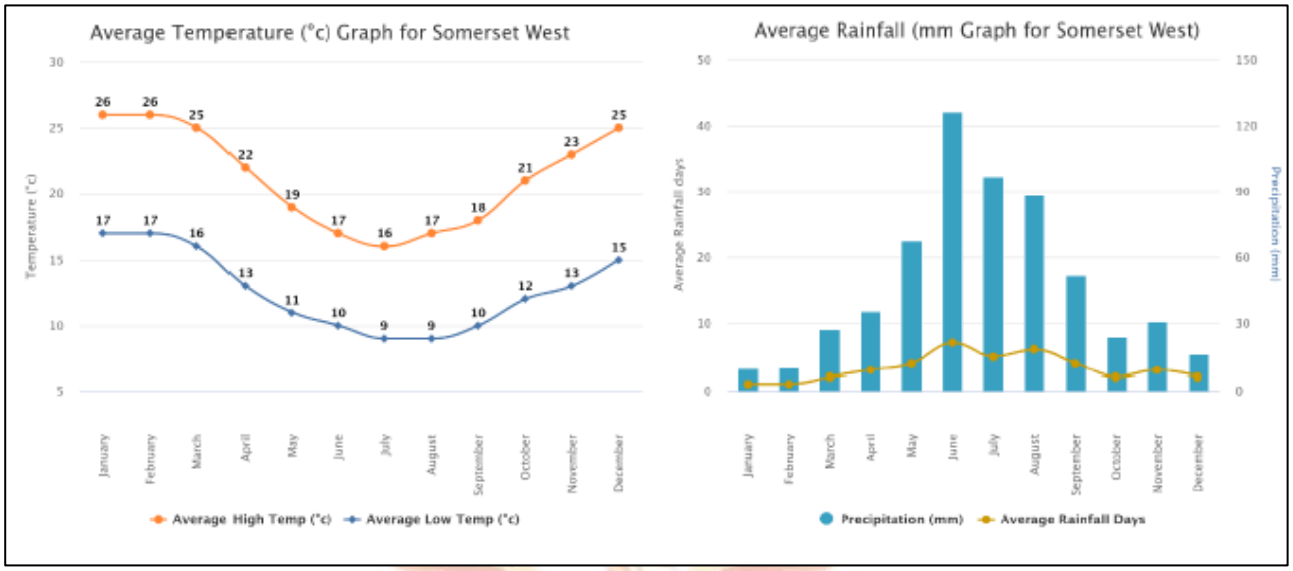


Figure 10: Climate graphs for the Somerset West area (Freshwater Report – EverWater, 2026)

8. Impacts and mitigation measures

The significant potential impacts and mitigation measures that are expected from the proposed activities are presented in Table 6.

Table 6: Summary of impacts and mitigation measures

Water Use activity	Impacts of the activity on the water resources	Impacts of the activity to other water users	Mitigation Measures	How will be the impact after mitigation
Wastewater Treatment Plant (pipelines, pump station and plant)	• Downstream water quality impacts		• A minimum 15m buffer around the Functional Wetland Area should be maintained for all future development activities. No infrastructure, roads, hard surfaces, stockpiling, or intensive landscaping should be permitted within this buffer area. • Demarcation fencing should be installed around the wetland and associated buffer zone prior to the commencement of construction to prevent accidental encroachment by construction vehicles, machinery, and personnel. • During the construction phase, contaminated runoff from any of the construction work sites must be prevented from directly entering the surrounding freshwater features. • Where feasible, construction should preferably take place during the dryer months (September through to March). • No excavated material, topsoil, spoil, or construction-related debris should be stockpiled within the wetland, buffer zone, or any area where runoff could transport sediment into downstream freshwater features. • Temporary diversion berms, cut-off drains, or similar stormwater control measures should be installed where necessary to prevent clean runoff from entering • The sewage pipeline must be routinely inspected and maintained, with appropriate leak detection/monitoring measures implemented to ensure the rapid identification of any leakage or malfunction. Any leakage must be immediately contained and repaired to prevent sewage from entering the adjacent wetland or downstream freshwater system. • The WWTP must be appropriately designed, operated and maintained to ensure that treated effluent consistently complies with the authorised discharge limits/ DWS Special wastewater limit values prior to discharge (as listed in Table 7). • As already stated by the client, the WWTP supplier will be responsible for the operation and maintenance of the plant through a service	*Low negative*

Water Use activity	Impacts of the activity on the water resources	Impacts of the activity to other water users	Mitigation Measures	How will be the impact after mitigation
			agreement and in accordance with a dedicated Maintenance and Management Plan. • Monitoring must be undertaken at the frequency and for the parameters specified in the applicable water-use authorisation, with additional monitoring during the dry season, with particular attention to nutrients (especially phosphate and nitrogen), electrical conductivity, suspended solids, organic loading and microbiological parameters. These should at minimum comply with the Special limits. • Visual inspections and receiving-water quality monitoring must be undertaken within the downstream stormwater system and Geelsloot, particularly during the dry season when dilution capacity is expected to be lowest. • An emergency response procedure must be implemented to prevent the discharge of non-compliant effluent in the event of WWTP malfunction or failure. Adequate backup power must be maintained to ensure continued operation of the treatment plant during electricity interruptions. • Any exceedance of the authorised discharge limits must be investigated and corrective action implemented immediately, with follow-up monitoring undertaken to confirm that water quality has returned to acceptable levels.	

Table 7: Wastewater limit values applicable to discharge of wastewater into a water resource (GN 665 of 2013). (EverWater - 2026 Freshwater report).

SUBSTANCE/PARAMETER	GENERAL LIMIT	SPECIAL LIMIT
Faecal Coliforms (per 100 ml)	1000	0
Chemical Oxygen Demand (mg/l)	75 (i)	30(i)
pH	5,5-9,5	5,5-7,5
Ammonia (ionised and un-ionised) as Nitrogen (mg/l)	6	2
Nitrate/Nitrite as Nitrogen (mg/l)	15	1,5
Chlorine as Free Chlorine (mg/l)	0,25	0
Suspended Solids (mg/l)	25	10
Electrical Conductivity (mS/m)	70 mS/m above intake to a maximum of 150 mS/m	50 mS/m above background receiving water, to a maximum of 100 mS/m
Ortho-Phosphate as phosphorous (mg/l)	10	1 (median) and 2,5 (maximum)
Fluoride (mg/l)	1	1
Soap, oil or grease (mg/l)	2,5	0
Dissolved Arsenic (mg/l)	0,02	0,01
Dissolved Cadm ium (mg/l)	0,005	0,001
Dissolved Chromium (VI) (mg/l)	0,05	0,02
Dissolved Copper (mg/l)	0,01	0,002
Dissolved Cyanide (mg/l)	0,02	0,01
Dissolved Iron (mg/l)	0,3	0,3
Dissolved Lead (mg/l)	0,01	0,006
Dissolved Manganese (mg/l)	0,1	0,1
Mercury and its compounds (mg/l)	0,005	0,001
Dissolved Selenium (mg/l)	0,02	0,02
Dissolved Zinc (mg/l)	0,1	0,04
Boron (mg/l)	1	0,5

9. Water demand and water supply Analysis

9.1 Water demand

Treated wastewater will be used to irrigate approximately 17 850m² of landscaped areas that form part of the Casino Hotel and Complex (see attached Landscaping Plan by Landmark – Appendix 5). The irrigation system has been designed to maximise water saving through two key methods. The system is equipped with a rain sensor that stops the irrigation cycle when there is rain, and the system is pre-programmed to adjust to seasonal water cycles. This system allows for up to 50% water saving. The irrigation volumes are divided between establishing and mature landscapes. During the establishing phase the annual predicted usage with the water saving system is 39 441m³. Once the landscape is established (mature) the predicted water usage with the water saving system is 11 880m³. As long as the WWTP is in use, treated effluent will be used to irrigate the landscaped areas. Once the WWTP is decommissioned, rainwater from the proposed rainwater catchment tanks will be used.

Table 8: Summary of water demand and uses once landscape is established.

Description	***Volume (m³/annum)***	***Source of Water***
Irrigation	*11 883*	*WWTP*
Total	***11 883***	

9.2 Water supply analysis

Table 9: Breakdown of water supply.

Source	*Name*	*Volume (m^3/annum)*
WWTP	*Treated Effluent*	*49 275*
Total		***49 275***

10. Water Balance

During the period when the landscape is still being established when planting is happening and plants tend to require more water for maximum growth period of their lifecycle the estimated amount of water used is 39 441m^3. This will likely only be for 1-2 years. Once the landscaping is established and plants have reached maturity the estimated annual water usage is 11 880m^3.

Table 8: Water balance table (note: Quantity is indicated in m^3/annum)

Establishing Landscape Phase (1-2 years)						
Facility Name	**Water In**		**Water Out**		**Balance**	**Comment**
	Water Stream	**Quantity**	**Water Stream**	**Quantity**		
WWTP	Treated Effluent	49 275	Irrigation	39 441	+9 834	
			Discharge	9 834	0	
	Total	**49 275**	**Total**	**49 275**	0	
Mature Landscape Phase (Long-term)						
	Water Stream	**Quantity**	**Water Stream**	**Quantity**		
WWTP	Treated Effluent	49 275	Irrigation	11 883	+ 37 392	
			Discharge	37 392	0	
	Total	**49 275**	**Total**	**49 275**	0	

11. Public participation

Planned process:

- A 60-day public participation period will take place from 21 October 2026 to 22 January 2027
- An advert will be placed in the local newspaper (District Mail and Helderberg Gazette) in English

- Site notices providing detail on the proposed water use, the application process and how to comment will be posted at the property boundary and community notice board (Somerset West Library) in English for the duration of the commenting period.
- The WULA technical summary report and supporting technical reports will be placed on the EAP's website (phsconsulting.co.za) for the duration of the commenting period.
- Notification of Interested and affected parties (I&APs) eg: neighbours and government officials will be by email
- A Comments and Responses report will be compiled as a true reflection of all comments received, responses provided or amendments made to the WULA.

Table 10: Outcome of the public participation.

Person who commented	Comments (support/ object/ concerns)	Reasons for objections/ concerns	Applicant's response to the objection/concerns
Refer to Comments and Response Report once PPP completed			

12. Inputs/Authorisations from other Departments /Stakeholders

In 2018, BOCMA confirmed that the development including the Stormwater Retention Pond would require a 21(c) and (i) General Authorisation and not a License Application.

Since 2018 it has been determined that a Wastewater Treatment Package Plant is needed therefore a NEMA checklist was completed that determined that no listed activities are triggered but, a consent use application is required.

13. Section 27 (1)

The requirements contained in Section 27(1) of the National Water Act, 1998 (Act 36 of 1998) have been considered and are discussed further below.

a) Existing lawful water uses

A General Authorisation exists for the construction of the main Casino and Hotel complex which will be constructed within the regulated area of the mapped wetland on site. The GA for sections 21 c and i was obtained in 2018. See WARMS document.

b) Need to redress the results of past racial and gender discrimination

Tsogo Sun Limited's (which includes Tsogo Sun Caledon (Pty) Ltd) B-BBEE certificate reflects an exceptionally strong transformation profile under the Generic Tourism Sector Code. The group achieved Level 1 Contributor status, with an overall score of 108.92 out of 111 and 135% procurement recognition. Of particular note is the company's performance in the core developmental pillars: Skills Development (19.40/20), Enterprise and Supplier Development (38.36/40) and Socio-Economic Development (8.00/5). These results indicate near-full compliance in training and supplier development, and performance above target in socio-economic contribution, underscoring a sustained commitment to workforce development, inclusive procurement and broader transformation objectives. The certificate also confirms Tsogo Sun Limited's (which includes Tsogo Sun Caledon (Pty) Ltd) status as an Empowering Supplier, further strengthening its procurement and stakeholder value proposition.

c) Efficient and beneficial use of water in the public interest

Tsogo Sun Caledon (Pty) Ltd is a subsidiary of Tsogo Sun Limited which according to the Generic Tourism Sector Code B-BBEE Verification has a score of 108.92 with a Black Ownership of 69.70% and Black Women Ownership of 39.29%.

d) Socio-economic impact –

i) Of water use or uses if authorised:

The Casino and Hotel will not be able to operate without the WWTP as there is currently no municipal capacity. Therefore, the authorisation of the water use will ensure the creation of jobs and contribute to the economic growth of the area. The socio-economic assessment assessed the construction phase (±18 Months) will create in the region of 4 800 employment opportunities. This will be made up of 2 000 low skilled workers, 2 000 semi-skilled workers and 800 skilled workers. The majority (more than 90%) of employment opportunities associated with the low and semi-skilled categories will be taken up by Historically Disadvantaged Individuals (HDIs). The majority of the skilled employment opportunities (more than 50%) are also likely to be taken by HDIs. The majority of work during the construction phase will be undertaken by locally based contractors and builders and therefore represent a significant boost for the local economy.

The socio-economic assessment revealed that the operation of the proposed casino, hotel and associated restaurants will create 650 permanent and in-house outsourced jobs. Of the 650 permanent employment opportunities, 100 will be low skilled, 200 semi-skilled and 350 skilled. An additional 300 employment opportunities will be created for businesses that

provide services to the casino, hotel and associated restaurants. The casino and hotel industry also implement continual training and skills development programmes for staff. The proposed casino and hotel will therefore also create opportunities to provide skills development and training programmes for low and semi-skilled employees. The development will enhance employment accessibility, by providing public transport embayment on the R102 as well as staff transport facilities into the site. See Table 11 below for summary of jobs created.

Table 11: Direct and indirect Job opportunities

Job Opportunities	Number of Job Opportunities	Type of employment	Affected sectors of the economy
Construction Phase			
Direct	4 800	Temporary (18 months), low-skilled, semi-skilled and skilled	Commercial
Operational Phase			
Direct	650	Permanent, low-skilled, semi-skilled and skilled	Commercial
Indirect	300	Service providers	
TOTAL	**5 750**		

ii) **Of the failure to authorise water use or uses:**

If the water use is not authorised, then the Casino and Hotel will be unable to process wastewater, and the project cannot be completed. The construction of a WWTP was listed as a condition of authorisation by the City of Cape Town as the formal sewerage system of the municipality does not have capacity and is only expected to be upgraded in 2031. This proposed development represents a significant boost to the local job market and economy throughout its construction and operation.

e) Any catchment management strategy applicable to the relevant water resource

The Department of Water and Sanitation (DWS) previously divided the country into 19 Water Management Areas (WMAs), each containing a large river system. The proposed development is located in what used to be the Berg and later the Berg-Olifants Water Management Area (WMA) (WRC, 2012). The Berg-Olifants WMA was administered by the Department of Water and Sanitation (DWS). As of 2023 the site is now located within the Breede-Olifants WMA and is administered by BOCMA.

Two of the guiding principles of the Catchment Management Strategy for the Breede-Gouritz Water Management Area (2017) are "Drive continual improvement in efficiency

around the productive use of water and wastewater and increase technical efficiency of municipal and agricultural water use" and "Reduce untreated or poorly treated wastewater discharge at point and non-point sources to avoid water quality problems." The proposed water use aligns with these principles as the treated wastewater (which will meet DWS Special Limits) will be used for irrigation i.e. a productive manner, instead of relying on exclusively on potable water supply from the municipality. Additionally, the unused treated wastewater that will be discharged will be of the highest potential quality as the proposed development will make use of the Water & Wastewater Africa BioSub Advanced Model that is able to treat wastewater to the point where it can be used not only for irrigation but also for toilet flushing, swimming pool make-up water, cooling water systems, boiler feed water, process water, potable water supplementation and environmental discharge to sensitive catchments.

f) Likely effect of the water use to be authorized on the water resource and on other water users.

The proposed water use is expected to have a low impact on surrounding water users with the greatest potential for impacts being related to discharge of treated effluent. The Geelsloot Stream (and surrounding stormwater system) was found to already be in a seriously modified state, together with the fact that effluent will pass through the existing stormwater drainage network and downstream vegetated swale systems before entering the Lourens River, these systems will provide opportunities for dilution, settling and biological uptake of residual organic matter, suspended solids and nutrients. Consequently, a substantial deterioration in the existing ecological condition of the downstream drainage system is not anticipated under normal operating conditions.

With the implementation of mitigation measures, namely: the WWTP is appropriately designed and operated, that the treated effluent consistently complies with the authorised discharge limits, and appropriate operational and water-quality monitoring. The proposed discharge is expected to result in a low negative impact on the downstream freshwater system for the duration of its operation. See Freshwater Report for full Impact Assessment and detailed mitigation measures.

g) Class and the resource quality objectives of the water resource

The site lies within quaternary catchment G22J within the Breede-Gouritz Catchment Management Area. A freshwater impact assessment in support of the WULA has been completed as part of the application.

The Geelsloot Stream, is a seasonal stream that drains the south-western slopes of the Helderberg Mountain and becomes extensively modified and canalised through the upstream urban environment. As mentioned, the stream is diverted through a network of highly modified stormwater canals and channels through the existing and former sections of the Somerset West Golf Course, with the main stem still flowing through the south-east corner of the site. From there it flows towards the Helderberg centre, where it is diverted around the property edge and joins the downstream stormwater system. Further downstream, the canalised stream passes through the urban area and the Strand Golf Club before discharging into the Lourens River, approximately 400m upstream of its mouth at False Bay (see Figure 6). The section flowing through the property, can be classified as being in a largely to seriously modified state, with a highly degraded riparian zone and large scale upstream hydrological and channel modifications. See summary of river assessment (Table 5).

h) Investments already made and to be made by the water user in respect of the water use in question

As of yet approximately R135 000 000 has been invested into the project, this includes land acquisition, design proposals, specialists and applications. The capital expenditure associated with the proposed development will be in the region of R1.8 billion (2018 rand value). The expected total wage bill for the construction phase will be in the region of R380 million (2018 rand value).

i) Strategic importance of the water use to be authorised

The authorisation of the proposed water use will be strategic from an economic point of view:

- The WWTP is proposed to treat sewage until capacity becomes available within the CoCT municipal wastewater treatment system, which is estimated to be 2031.
- The WWTP is a condition of project approval from CoCT
- The WWTP will enable the minimised use of municipal water supply for irrigation
- The Casino and Hotel are expected to generate multiple long-term job opportunities
- The proposed water use aligns with guiding principles of Catchment Management Strategy for the Breede-Gouritz Water Management Area (2017)

j) The quality of water in the water resource which may be required for the Reserve and for meeting international obligations

There are no reserve obligations or international obligations in terms of the water resource for this site at this time.

k) Probable duration of any undertaking for which a water use is to be authorised

The CoCT currently does not have capacity for the wastewater generated by the proposed casino and hotel, but under the current timeline there will be capacity by 2031. Thus, the minimum duration of this water use is 20 years.

14. Declaration by the applicant with signature confirming that the information submitted is correct.

We the Applicant, Tsogo Sun Caledon Pty Ltd (registration number: 1996/010708/07), hereby confirm that the information submitted as part of this WULA application is true.

Signed By: PHILIP KRUGER

Signature: 

Date: 20 OCTOBER 2026