GEORGE
TEL: +27 (0) 44 873 4923 **FAX:** +27 (0) 44 874 5953
EMAIL: info@sescc.net **WEBSITE:** www.sescc.net
ADDRESS: Unit 17 Cathedral Square,
Cathedral Street, George, 6530
PO BOX: 9087, George, 6530

CAPE TOWN
TEL: +27 (0) 21 554 5195 **FAX:** +27 (0) 86 575 2869
EMAIL: betsy@sescc.net **WEBSITE:** www.sescc.net
ADDRESS: Tableview, Cape Town, 7441
PO BOX: 443, Milnerton, 7435

NEMA SECTION 24G APPLICATION FORM

FOR THE

UNLAWFUL ENCROACHMENT WITHIN THE COASTAL ZONE AT ERF 90 AND REMAINDER OF FARM 158, WILDERNESS, WESTERN CAPE PROVINCE

In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended 7 April 2017)

PREPARED FOR: The Pallister Trust
Geoffrey Pallister
Unit 1, Windsor Park, 110 Epsom Rd, Stirling
East London
5241

DATE: 23 June 2025

SES REF NO: S24G/AF/W/WC/25
DFFE REF.NO.: 14/2/4/1/D2/54/0007/25

Western Cape Government
Environmental Affairs and Development Planning

BETTER TOGETHER.

NEMA SECTION 24G APPLICATION COMPLETENESS CHECKLIST

IMPORTANT: Kindly ensure that this checklist is completed and attached to the NEMA SECTION 24G Application.

Please indicate by ticking the following below to serve as confirmation that the required information has been included in the application.

No.	Application Requirements	Please tick for confirmation
1.	Requirements of Preliminary Advertisement (pre-application public participation requirements including register of all I&APs), in accordance with Annexure A, Section D of the Section 24G Fine Regulations. **(Note: Failure to meet the Regulation 8 will result in rejection of the application)**	X
2.	Application form has been completed and attached, which includes among others:	X
	2.1. A list of all listed activities and/or waste management activities that was triggered when the development activity was commenced with.	X
	2.2. A list of all **similarly listed** activities in terms of the current EIA regulations (if applicable).	X
	2.3. A description of the receiving environment **before** commences of the activity(ies).	X
	2.4. A description of the receiving environment **after** commences of the activity(ies).	X
	2.5. All appendices and annexures:	X
	2.5.1. Locality map	X
	2.5.2. Site plans or/and Layout plan	X
	2.5.3. Building plans (if applicable)	X
	2.5.4. Colour photographs	X
	2.5.5. Biodiversity overlay map	X
	2.5.6. Permit(s) / license(s) from any other organ of state including service letters from the municipality	X
	2.5.7. Public participation information: including a copy of the register of interested and affected parties, the comments and responses report, proof of notices, advertisements, Land owner consent and any other public participation information	X
	2.5.8. Environmental Management Programme	
	2.5.9. Certified copy of Identity Document of Applicant	X
	2.5.10. Certified copy of the title deed (or title deeds in the case of linear activities)	X
	2.6. Signed declaration forms.	X
3.	Are any specialist assessments required: e.g. Botanical, Hydro-geological, soil, socio-economic?	**Y** / N
	3.1. If yes, has the specialist assessment report been attached to the application?	X
4.	An assessment of the impacts of the activity or activities in terms of the following categories:	X
	• Socio-economic	X
	• Biodiversity	X
	• Sense of place &/or Heritage/ Cultural	X
	• Any pollution or environmental degradation which has been, is being, is being or may be caused	X
5.	A methodology of how the investigation into the impacts associated with the unlawful activity was undertaken.	X
6.	Completed and attached representations of Annexure A, Section A (Directives) in terms of the S24G Fine Regulations: Information/ Representation submitted in terms of any Directives the Minister/ decision maker may issue in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA) s24G(1)(b)(i)-(viii).	X
7.	Completed and attached representations in terms of Annexure A, Section B (Deferral) of the S24G Fine Regulations.	X

8.	Completed and attached representations in terms of Annexure A, Section C, Part 1 (Fine Quantum based on the assessment as specified above (4).	**x**
	Confirmation that Annexure A, Section C, Part 1 has been completed by an environmental assessment practitioner (EAP)	**x**
9.	Compliance history of the applicant:	**x**
	9.1. Completed Annexure A, Section C, Part 2 and 3; namely:	**x**
	9.1.1. Whether or not administrative enforcement notices, including pre -notices where appropriate, have previously been issued to the applicant in respect of a contravention of section 24F(1) of the NEMA and/or section 20(b) of the National Environmental Management: Waste Act (Act 59 of 2008) (NEM: WA).	**x**
	9.1.2. Whether or not the applicant has previously been convicted in respect of a contravention of section 24F(1) of the Act and /or section 20(b) of the NEM: WA;	**x**
	9.1.3. Whether or not the applicant has previously submitted a section 24G application in respect of an activity or activities which commenced prior to the activity or activities that are the subject of the current application; and	**x**
	9.1.4. Whether the applicant is a firm or a natural person. (see Section 24G Fine Regulations for definition of "firm")	**x**
	9.2. Provided information or whether or not any of the directors of the applicant firm are, or were, at the relevant time, directors of a firm to whom the above (9.1.1. - 9.1.3.) applies;	**x**
	9.3. Advise on whether an applicant who is a natural person is, or was, at the relevant time a director of a firm to whom the above (9.1.1.- 9.1.3.) may apply.	**x**
10.	Consultation with relevant State departments in terms of section 24O(2) & 24O(3) of the NEMA.	**x**
	10.1 Proof of Consultation with relevant State departments, including, *inter alia*, notices, adverts etc.	**x**
	10.2 Copies of comments and responses included in the application.	**x**
	10.2 Comments and Response report attached to the application.	**x**
11.	Public Participation Process undertaken in terms of Chapter 6 of the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations, 2014") *(GN No. R.326 of 7 April 2017)* **(if conducted/undertaken)**	**x**

NEMA SECTION 24G APPLICATION FORM

Section 24G Application Form for the consequences of unlawful commencement of listed activity/ies in terms of the:

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

April 2018

Form Number S24GAF/04/2018

Kindly note that:

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

2. This **Application Form** must be completed for all section 24G applications, by an independent Environmental Assessment Practitioner ("EAP").

3. This Application Form is current as of 01 April 2018. It is the responsibility of the Applicant/EAP to ascertain whether subsequent versions of the Application Form have been published or produced by the competent authority. Note that this Application Form replaces all the previous versions. This updated Application Form must be used for all new applications submitted from 01 April 2018.

4. **<u>The contents of this Application Form includes the following:</u>**

   PART 1 -
   Section A: Background Information
   Section B: Activity Information
   Section C: Description of Receiving Environment
   Section D: Need and Desirability
   Section E: Alternatives
   Section F: Impact Assessment, Management, Mitigation and Monitoring Measures
   Section G: Assessment Methodologies and Criteria, Gaps in Knowledge, underlying Assumptions and Uncertainties
   Section H: Recommendations of the EAP
   Section I: Representations - Response to an Incident or Emergency Situation
   Section J: Public Participation Process

   PART 2 –
   ANNEXURE A of Fine Regulations
   Section A: Directives
   Section B: Deferral of the Application
   Section C: Quantum of the section 24G fine
   Section D: Preliminary advertisement

   PART 3 –
   Appendices and Declarations

   PART 4 –
   ANNEXURE B: Waste Management Activity Supporting Information (if relevant)

5. An independent EAP must be appointed to complete the required sections (in terms of NEMA and its Regulations) of the Application Form on behalf of the applicant; the declaration of independence must be completed by the independent EAP and submitted with this Application Form. If a specialist report is required, the specialist will also be required to complete the declaration of independence.

6. Two hard copies (including the original) and one electronic copy (CD/DVD/Flash drive) of this application form must be submitted.

7. The required information must be typed within the spaces provided. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. The space provided extend as each space is filled with typing. **A legible font type and size must be used when completing the form.** A digital copy of the Application Form is available on the Department's website https://www.westerncape.gov.za/eadp/

8. The use of "not applicable" in the Application Form must be done with circumspection.

9. **No faxed or e-mailed application forms will be accepted.**

10. Unless protected by law, all information contained in and attached to this application will become public information on receipt by the competent authority. Please note that, unless exemption has been granted in terms of the National Exemption Regulations published under GN R994 in GG 38303 of 8 December 2014, any Interested and Affected Party should be provided with the information contained in and attached to this Application Form as well as any subsequent information submitted.

11. This Application Form must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department.

PROCESS TO BE FOLLOWED:

a) **Prior to submission of an Application Form,** the applicant is required to undertake a pre-application public participation process in terms of Regulation 8 of the Regulations relating to the procedure to be followed and criteria to be considered when determining an appropriate fine in terms of section 24G published in the Government Gazette on 20 July 2017, Gazette No 40994, No. R. 698 ("Section 24G Fine Regulations").

b) Together with the submission of a section 24G Application Form, the form **must include Proof of compliance of with Regulation 8** of the Section 24G Fine Regulations, including, but not limited to, proof of the pre-application advertisement in a local newspaper and register of I&APs.

c) The Department will acknowledge receipt of the application (within 14 days) and provide the Applicant / EAP with the relevant application reference number to be used in all future correspondence and the application public participation processes.

d) Upon receipt of the application, the MEC/Competent Authority may direct the applicant in terms of section 24G(1)(i-viii) of the NEMA.

e) In terms of the provisions of section 24G of NEMA, the applicant must pay an administrative fine up to a maximum of R5 million before the MEC/Competent Authority decides on the application.

f) The applicant **must within 14 days** of receipt of the determination of the quantum of the fine, ensure that all registered interested and affected parties are notified of the determination of the quantum of the fine, including the reasons and provided with access to the determination.

g) The administrative fine **must be paid within the time period stipulated** in the determination. Failure to pay the fine within the specified period, will result in the lapse of the application and any partial amounts paid in will not be refunded.

h) **Proof of payment of the fine must be submitted to the Department**. Upon payment of the administrative fine, the MEC/Competent Authority may-

- refuse to issue an environmental authorisation; or
- issue an environmental authorisation to such person to continue, conduct or undertake the activity subject to such conditions as may be deemed necessary, which environmental authorisation shall only take effect from the date on which it has been issued; or
- direct the applicant to provide further information or take further steps prior to making a decision provided for above;
- together with the above decision the MEC/Competent Authority may direct a person to rehabilitate the environment within such time and subject to such conditions as may deem necessary or take any other steps necessary under the circumstances.

PLEASE NOTE THE FOLLOWING:

1. Failure to comply with a directive may result in the institution of appropriate legal action as is deemed necessary and as provided for in the legislation.

2. The submission of an application or the granting of an environmental authorisation shall in no way derogate from—

(a) the environmental management inspector's or the South African Police Services' authority to investigate any transgression in terms of NEMA or any specific environmental management Act;
(b) the National Prosecuting Authority's legal authority to institute any criminal prosecution.

3. If, at any stage after the submission of an application it comes to the attention of the Minister, Minister for mineral resources or MEC that the applicant is under criminal investigation for the contravention of or failure to comply with section 24F(1) or section 20(b) of the *National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)*, the Minister, Minister for mineral resources or MEC may defer a decision to issue an environmental authorisation until such time that the investigation is concluded and—
   (a) the National Prosecuting Authority has decided not to institute prosecution in respect of such contravention or failure;
   (b) the applicant concerned is acquitted or found not guilty after prosecution in respect of such contravention or failure has been instituted; or
   (c) the applicant concerned has been convicted by a court of law of an offence in respect of such contravention or failure and the applicant has in respect of the conviction exhausted all the recognised legal proceedings pertaining to appeal or review.

4. A person is guilty of an offence if that person:

   - Prior to submission of a section 24G application:
     - fails, in terms of Regulation 8(1), to place a preliminary advertisement in a local newspaper in circulation in the area in which the activity was, or activities were, commenced and on the applicant's website, if any or
     - fails, in terms of Regulation 8(2), to comply with the advertisement requirements set out in Annexure A, section D or
     - fails, in terms of Regulation 8(3), to open and maintain a register of interested and affected parties)); or
     - fails, in terms of Regulation 8(4), to attach to the application form the register of interested and affected parties, which must be included in the report, or form part of the information submitted in terms of section 24G(1) of NEMA.

   - Provides incorrect, false or misleading information in any form, including in any document submitted to a competent authority in terms of the Section 24G Fine Regulations or omits information that may have an influence on the outcome of a recommendation of the fine committee or determination of the competent authority.

5. A person convicted of an offence in terms of these Regulations is liable to a fine not exceeding R5 million or to imprisonment for a period not exceeding 5 years, and in the case of a second or subsequent conviction to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, and in both instances to both such fine and such imprisonment.

DEPARTMENTAL DETAILS

Department of Environmental Affairs and Development Planning,
Directorate: Environmental Governance
Attention: Sub-directorate: Rectification
Private Bag X9086
Cape Town, 8000

Registry Office
1st Floor Utilitas Building
1 Dorp Street, Cape Town

Queries should be directed to the Sub-directorate: Rectification at:
Tel: (021) 483-5827 Fax: (021) 483-4033

DEPARTMENTAL REFERENCE NUMBER(S) (for official use)

File Reference number (S24G)	14/2/4/1/D2/54/0007/25
Administrative Fine Reference	

DEPARTMENTAL REFERENCE NUMBER(S) (to be completed by the EAP)

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

View the Department's website on http://www.westerncape.gov.za/eadp for the latest version of the documents

PART 1

PROJECT TITLE

UNLAWFUL ENCROACHMENT WITHIN THE COASTAL ZONE AT ERF 90 AND REMAINDER OF FARM 158, WILDERNESS, WESTERN CAPE PROVINCE

RELEVANT REGION IN WHICH THE ACTIVITY COMMENCED

Cross out the appropriate box "☒" in which region the unlawful activity/ies has commenced.

REGION 1 City of Cape Town and West Coast District	REGION 2 Cape Winelands District and Overberg District	**REGION 3** **Central Karoo District and Eden District**
		X

SECTION A: BACKGROUND INFORMATION

1. APPLICANT PROFILE INDEX

Cross out the appropriate box "☒".

1.1	The applicant is a Natural Person (individual)					
1.2	The applicant is a Firm (i.e. any body incorporated by, or established in terms of, any law as well as any partnership, trust, parastatal or organ of state)					**X**
1.2.1	If a firm, please tick the relevant box below:					
	Body Corporate	Partnership	**Trust X**	Parastatal	Organ of State	
	Directors of a Company	Members of a Board	Other, please specify			

Applicant's details (duplicate this section where there is more than one	

applicant)			
Applicant Name:	The Pallister Trust		
RSA Identity Number/ Passport Number of Applicant, if natural person:	4208205049088		
Name of Firm (if applicable):	The Pallister Trust		
Firm Registration Number:	IT 199/84		
Contact Person at the Firm:	Geoffrey Flemmer Pallister		
List of all (as applicable at the relevant time):	Please insert the names and RSA ID numbers of the relevant persons below – **(In the list below, delete the firms that are not applicable to this application)**		
~~● Directors of a company; or~~ ~~● Members of the board; or~~ ~~● Executive committee or other managing body of a corporate body or parastatal; or~~ ~~● Members of close corporation; or~~ ~~● Partners of a partnership; or~~ ● Trustees of a trust	~~Name:~~ ~~RSA ID No.~~ ~~Name:~~ ~~RSA ID No.~~ ~~Name:~~ ~~RSA ID No.~~ ~~Name:~~ ~~RSA ID No.~~ ~~Name:~~ ~~RSA ID No.~~ Name: Geoffrey Pallister RSA ID No.: 4208205049088		
Postal address:	Unit 1, Windsor Park, 110 Epsom Rd, Stirling		
	East London	Postal code:	5241
Telephone:	082 318 4141	Cell:	082 318 4141
E-mail:	valpal@mweb.co.za	Fax:	( )
Project Consultant	Sharples Environmental Services cc		
Contact person:	Michael Jon Bennett		
Postal address:	PO Box 9087		
	George	Postal code:	6530
Telephone:	044 873 4923	Cell:	
E-mail:	Michael@sescc.net	Fax:	( )
Name of the Environmental Assessment Practitioner ("EAP") responsible for the application:	EAP: Michael Bennett Candidate EAP: Christiaan Smit		
Company name (if any):	Sharples Environmental Services cc		
Postal address:	PO Box 9087		
	George	Postal code:	6530
Telephone:	044 873 4923	Cell:	
E-mail:	Michael@sescc.net Christiaan@sescc.net	Fax:	( )
EAP Qualifications	Michael: BSc in Environmental and Geographic Science & Ocean and Atmospheric Science Christiaan: MPhil in Environmental Management PGD in Environmental Management BSc in Biodiversity and Ecology		
EAP Registrations/Associations	Michael EAP: 2021/3163 Christiaan Candidate EAP: 2024/8297		
Name of the Landowner:	The Pallister Trust		
Name of the contact person for the land owner (if other):	Geoffrey Flemmer Pallister		

Postal address:	Unit 1, Windsor Park, 110 Epsom Rd, Stirling		
	East London	Postal code:	5241
Telephone:	082 318 4141	Cell:	082 318 4141
E-mail:	Valpal@mweb.co.za	Fax:	( )
Person in control of land:	The Pallister Trust		
Contact person:	Geoffrey Flemmer Pallister		
Postal address:	Unit 1, Windsor Park, 110 Epsom Rd, Stirling		
	East London	Postal code:	5241
Telephone:	082 318 4141	Cell:	082 318 4141
E-mail:	Valpal@mweb.co.za	Fax:	( )

Please note:

In instances where there is more than one landowner, please attach a list of landowners with their contact details to the back of this form.

A certified copy of the applicant's (if natural person), alternatively a director's (as defined), Identity Document must be attached to the application.

A certified copy of the title deed of the property/s on which the unlawful listed activity/ies has commenced must be attached to the application.

Municipality in whose area of jurisdiction the activity falls:	George Municipality		
Contact person, if known:	Municipal Manager		
Postal address:	PO Box 19		
	George	Postal code:	6530
Telephone	044 801 9111	Cell:	
E-mail:	Tlduplooy@george.gov.za	Fax:	( )

Please note:

In instances where there is more than one Municipality involved, please attach a list of Municipalities with their respective contact details to the form.

Property location(s):	Wilderness, Western Cape
Farm/Erf name(s) & number(s) including portion(s)	Erf 90 and RE/158
Property size(s) (m^2)	**Erf 90:** 948.2m^2 **RE/158:** 3.70 Ha
Development footprint size(s) (m^2)	380m^2
SG21 Digit code(s)	**Erf 90:** C02700090000009000000 **RE/158:** C02700000000015800000

Property boundary: Erf 90

Point	Latitude (S)	Longitude (E)
1	33°59'44.50" South	22°33'57.34" East
2	33°59'45.21" South	22°33'56.94" East
3	33°59'45.61" South	22°33'58.05" East
4	33°59'44.45" South	22°33'58.57" East

Figure 1: Locality of Erf 90 property boundary GPS coordinate points.

Property boundary: RE/158

Point	Latitude (S)	Longitude (E)
1	33°59'45.09" South	22°33'56.48" East
2	33°59'45.27" South	22°33'56.35" East
3	33°59'45.77" South	22°33'59.92" East
4	33°59'45.60" South	22°33'59.85" East

Figure 2: Locality of RE/158 applicable property boundary GPS coordinate points.

The co-ordinates for the site boundary are:

Point	Latitude (S)	Longitude (E)
1	33°59'45.19" South	22°33'56.98" East
2	33°59'45.35" South	22°33'56.82" East
3	33°59'45.45" South	22°33'56.93" East
4	33°59'45.76" South	22°33'57.34" East
5	33°59'45.89" South	22°33'58.04" East
6	33°59'45.57" South	22°33'58.04" East

Figure 3: Locality of site boundary GPS coordinate points.

Please note:

Where numerous properties/sites are involved (e.g. linear activities), attach a list of property descriptions and street addresses to the consultation form.

Street address:	Sands Road		
Magisterial District or Town:	Wilderness		
Closest City/Town:	Wilderness	Distance	(0 km)
Zoning of Property:	**Erf 90:** Single Residential Zone I **RE/158:** Transport Zone II		

Please note:

In instances where there is more than one zoning applicable, please attach a list or map of the properties indicating their respective zoning to the Application Form.

Was the property rezoned after commencement of activities?	YES	**NO**
If yes, what was the previous zoning?		
Is a rezoning application required?	YES	**NO**
Is a consent use application required?	YES	**NO**
Locality map:	A locality map must be attached to the Application Form as an appendix. The scale of the locality map must be at least 1:50 000. For linear activities 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; • the prevailing wind direction; and • GPS co-ordinates (Indicate the position of the proposed activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates should be in degrees and decimal minutes. The minutes should have at least three decimals to ensure adequate accuracy. The projection that must be used in all cases is the WGS-84 spheroid in a national or local projection)	
Landowner(s) Consent:	If the applicant is not the owner or person in control of the land on which the activity has been undertaken, he/she must obtain written consent from all landowners or persons in control of the land (of the site and all alternative sites). This must be attached to this document as Appendix G. Such consent must indicate whether or not the owner or person in control of the land would support approval of the application and that the land need not be rehabilitated. **Note:** The consent of the landowner or person in control of the land is not required for: a) linear activities; b) an activity directly related to prospecting or exploration of a mineral and petroleum resource or extraction and primary processing of a mineral resource; or c) strategic integrated projects ("SIPs") as contemplated in the *Infrastructure Development Act, 2014 (Act No. 23 of 2014*).	

2. APPLICATION HISTORY

(Cross out the appropriate box "☒" and provide a description where required).

Has any national, provincial or local authority considered any development applications on the property previously?	Yes	**No**
If so, please give a brief description of the type and/or nature of the application/s as well as a reference number, if applicable: (In instances where there was more than one application, please attach a list of these applications)		
Which authority considered the application:		
Has <u>any</u> one of the previous application/s on the property been approved **or** refused? If so provide a list of the successful and unsuccessful application/s and the reasons for decision(s).	Yes	No
Provide detail on the period of validity of decision and expiry dates of the above applications/ permits etc.		

SECTION B: ACTIVITY INFORMATION

1. ACTIVITIES APPLIED FOR

I hereby apply in terms of section 24G of the National Environmental Management Act (Act 107 of 1998) for the regularisation of the unlawful commencement or continuation of the listed or waste management activities as specified in Section B:1 below.

Applicant (Full names): Geoffrey Flemmer Pallister Signature: [signature]

Place: 1 WINDSOR PARK, 110 EPSOM RD EAST LONDON. Date: 20 JUNE 2025

EAP (Full names): Michael Jon Bennett Signature: [signature]

Place: George Date: 23 June 2025

All listed activities associated with the development must be indicated below.

1.1 Applicable EIA listed activities

~~ECA EIA Contraventions: between 08 September 1997 and end of 09 May 2002~~ ~~Activities commenced with on or after 08 September 1997 and before end 09 May 2002: EIA regulations promulgated in terms of the ECA, Act 73 of 1989~~			
~~Government Notice No. ("GN") R1182 Activity No(s):~~	~~Describe the relevant listed activity/ies in writing as per GN No. 1182 of 1997~~	~~Describe the portion of the development as per the project description that relates to the applicable listed activity.~~	~~State the date of commencement of each activity~~
ECA EIA Contraventions: between 10 May 2002 and end of 02 July 2006			
Activities unlawfully commenced with on or after 10 May 2002 and before end 02 July 2006: EIA regulations promulgated in terms of the ECA, Act 73 of 1989.			
1 (e)	Marinas, harbours and all structures below the high water mark of the sea and marinas, harbours and associated structures on inland waters.	The construction of the rock revetment.	October 2003
~~NEMA EIA Contraventions: between 03 July 2006 and end of 01 August 2010~~			
~~Activities unlawfully commenced with on or after 03 July 2006 and before end 01 August 2010: EIA regulations promulgated in terms of the NEMA~~			
~~GN R386 Activity No(s): (Listing Notice 1 of 2006)~~	~~Describe the relevant listed activity/ies in writing as per GN No. R. 386 of 2006 ("NEMA 2006 Basic Assessment listed activity/ies")~~	~~Describe the portion of the development as per the project description that relates to the applicable listed activity.~~	~~State the date of commencement of each activity~~
~~Government Notice No. R387 Activity No(s): (Listing Notice 2 of 2006)~~	~~Describe the relevant listed activity/ies in writing as per GN No. R. 387 of 2006 ("NEMA 2006 Scoping/EIA listed activity/ies")~~	~~Describe the portion of the development as per the project description that relates to the applicable listed activity.~~	~~State the date of commencement of each activity~~

NEMA EIA Contraventions: between 02 August 2010 and end of 07 December 2014			
Activities unlawfully commenced with on or after 02 August 2010 and before end 07 December 2014: EIA regulations promulgated in terms of the NEMA, Act 107 of 1998,			
GN No. R. 544 Activity No(s): **(Listing Notice 1 of 2010)**	Describe the relevant listed activity(ies) in writing as per GN No. R. 544 of 2010 ("NEMA 2010 Basic Assessment listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
GN No. R. 545 Activity No(s): **(Listing Notice 2 of 2010)**	Describe the relevant listed activity/ies in writing as per GN No. R. 545 of 2010. (NEMA 2010 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
GN No. R. 546 Activity No(s): **(Listing Notice 3 of 2010)**	Describe the relevant listed Activity(ies) in writing as per GN No. R. 546 of 2010	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
NEMA EIA Contraventions: on or after 08 December 2014			
Activities unlawfully commenced with on or after 08 December 2014: EIA regulations promulgated in terms of the NEMA, Act 107 of 1998,			
GN No. R. 327 Activity No(s): **(Listing Notice 1 of 2014)**	Describe the relevant listed activity(ies) in writing as per GN No. R.327 of 2014 ("NEMA 2014 Basic Assessment listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
GN No. R. 325 Activity No(s): **(Listing Notice 2 of 2014)**	Describe the relevant listed activity(ies) in writing as per GN No. R.325 of 2014 ("NEMA 2014 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
GN No. R. 324 Activity No(s): **(Listing Notice 3 of 2014)**	Describe the relevant listed activity(ies) in writing as per GN No. R.324 of 2014	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity

Please ensure that you have provided the similarly listed activities if the listed activities were commenced before the period the EIA Regulations came into effect, i.e. before 08 December 2014.

1.2 Applicable Waste Management Activities

List the relevant waste management activity/ies applied for:

Waste Management Activity Contraventions: On or after 03 July 2007 up to end of 28 November 2013			
Activities unlawfully commenced with in terms of GNR 718 of 03 July 2009 under the National Environmental Management Waste Act, Act 59 of 2008			
GN No. 718 – Category A Activity No(s):	Describe the relevant Category A waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity
GN No. 718 – Category B Activity No(s):	Describe the relevant Category B waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity

Waste Management Activity Contraventions: On or after 29 November 2013			
Activities unlawfully commenced with in terms of GNR 921 of 29 November 2013 under the National Environmental Management Waste Act, Act 59 of 2008,			
GN No. 921 - Category A Activity No(s):	Describe the relevant Category A waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity
GN No. 921 – Category B Activity No(s):	Describe the relevant Category B waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity

Please note:

The National Department of Environmental Affairs is the competent authority for activities regarded as hazardous waste. Such activities must be indicated as hazardous waste in the abovementioned lists.

Only those activities listed above shall be considered for authorisation. 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, an application for amendment or a new application for Environmental Authorisation will have to be submitted.

1.3 Activities listed similarly in terms of the EIA Regulations

Kindly indicate the listed activities in terms of the EIA Regulations that is listed similar to the unlawfully commenced activities. The descriptions provided below must clearly state why the activity/development is still similarly listed in terms of the EIA Regulations, 2014.

The similarly listed activities in terms of the EIA Regulations promulgated in terms of the NEMA, Act 107 of 1998,		
GN No. R. 327 Activity No(s): **(Listing Notice 1 of 2014)**	Describe the relevant listed activity(ies) in writing as per GN No. R.327 of 2014 ("NEMA 2014 Basic Assessment listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.
18	**The planting of vegetation or placing of any material on dunes or exposed**	The rock revetment was placed within the littoral active zone, covered with sand and vegetated to

	sand surfaces of more than 10 square meters, within the littoral active zone, for the purpose of preventing the free movement of sand, erosion or accretion, excluding where — (i) the planting of vegetation or placement of material relates to restoration and maintenance of indigenous coastal vegetation undertaken in accordance with a maintenance management plan; or (ii) such planting of vegetation or placing of material will occur behind a development setback.	prevent the free movement of sand, **therefore in order to authorize the revetment in terms of current legislation, this activity must be authorized.**
19A	The infilling or depositing of any material of more than 5 cubic meters into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic meters from— (i) the seashore; (ii) the littoral active zone, an estuary or a distance of 100 meters inland of the highwater mark of the sea or an estuary, whichever distance is the greater; or (iii) the sea; — but excluding where such infilling, depositing , dredging, excavation, removal or moving— (f) will occur behind a development setback; (g) is for maintenance purposes undertaken in accordance with a maintenance management plan; (h) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (i) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.	More than 5 cubic meters of sand was moved during the installation of the rock revetment, **therefore in order to authorize the revetment in terms of current legislation, this activity must be authorized.**
52	The expansion of structures in the coastal public property where the development footprint will be increased by more than 50 square metres, excluding such expansions within existing ports or harbours where there will be no increase in the development footprint of the port or harbour and excluding activities listed	The rock revetment entailed the expansion of existing protection measures at Erf 90, and the development footprint within coastal public property was increased by more than 50 square meters, **therefore in order to authorize the revetment in terms of current legislation, this activity must be authorized.**

	in activity 23 in Listing Notice 3 of 2014, in which case that activity applies.	
~~GN No. R. 325 Activity No(s):~~ **~~(Listing Notice 2 of 2014)~~**	~~Describe the relevant listed activity(ies) in writing as per GN No. R.325 of 2014 ("NEMA 2014 Scoping/EIA listed activity/ies")~~	~~Describe the portion of the development as per the project description that relates to the applicable listed activity.~~
~~GN No. R. 324 Activity No(s):~~ **~~(Listing Notice 3 of 2014)~~**	~~Describe the relevant listed activity(ies) in writing as per GN No. R.324 of 2014~~	~~Describe the portion of the development as per the project description that relates to the applicable listed activity.~~

Please note:

Where approvals for the activity have been obtained in terms of any other legislation (e.g. National Water Act, Act 36 of 1998), certified copies of such approvals must be attached to this form.

2. ACTIVITY DESCRIPTION

(Cross out the appropriate box "☒" and provide a description where required).

Is/are the activity(ies) complete or is/are the activity(ies) still to be completed?	**Completed**	Incomplete
(a) Is/was the project a new development or an upgrade of an existing development? Also indicate the date (e.g. 2 August 2010) when the activity commenced as well as the original date of commencement if the application is an upgrade.	New	**Upgrade**
Upgrade of an existing development. Original date of commencement – 1934.		

(b) Clearly describe the activity and associated infrastructure commenced with, indicating what has been completed and what still has to be completed.
The house at Erf 90 was constructed in 1934 and included beach access (steps), the protection of Erf 90 boundary against tidal surges of the sea also commenced in 1934. The following is a timeline depiction of the activities that have occurred at Erf 90 to protect the house and property boundary from the sea (Please also see Appendix J2): • 1934 – Terraced sand dune protection measures were implemented upon completion of the house. Beach access can also be seen. See Figure 4 below.

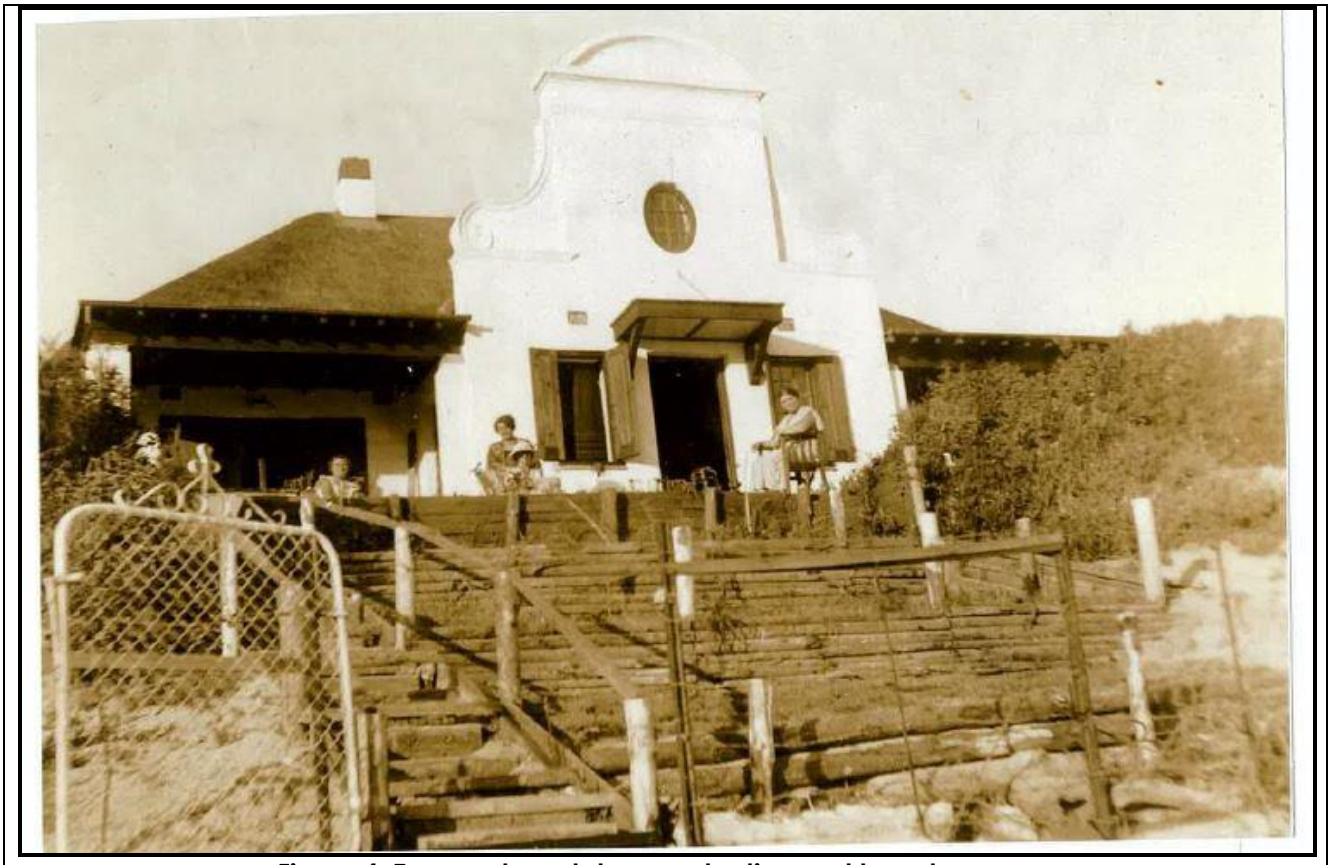

Figure 4: Terraced sand dune protection and beach access.

- Late 1930's – Substantial wood barrier built to protect the house and property boundary from the sea. See Figure 5 below.

Figure 5: Western side view showing substantial wood barrier.

- Early 1960's – Brick and mortar barriers built on the property boundary at the beach level to protect the house from the ravages of the sea. During this time a low sloping dyke was also built to aid in protection efforts, as well as a curved reinforced wall towards the more vulnerable South-East portion of the property. See Figure 6, 7 and 8 below.

Figure 6: First brick mortar barriers installed at the property boundary at beach level. In the foreground is the low sloping dyke and beach access. Further along is the curved reinforced wall.

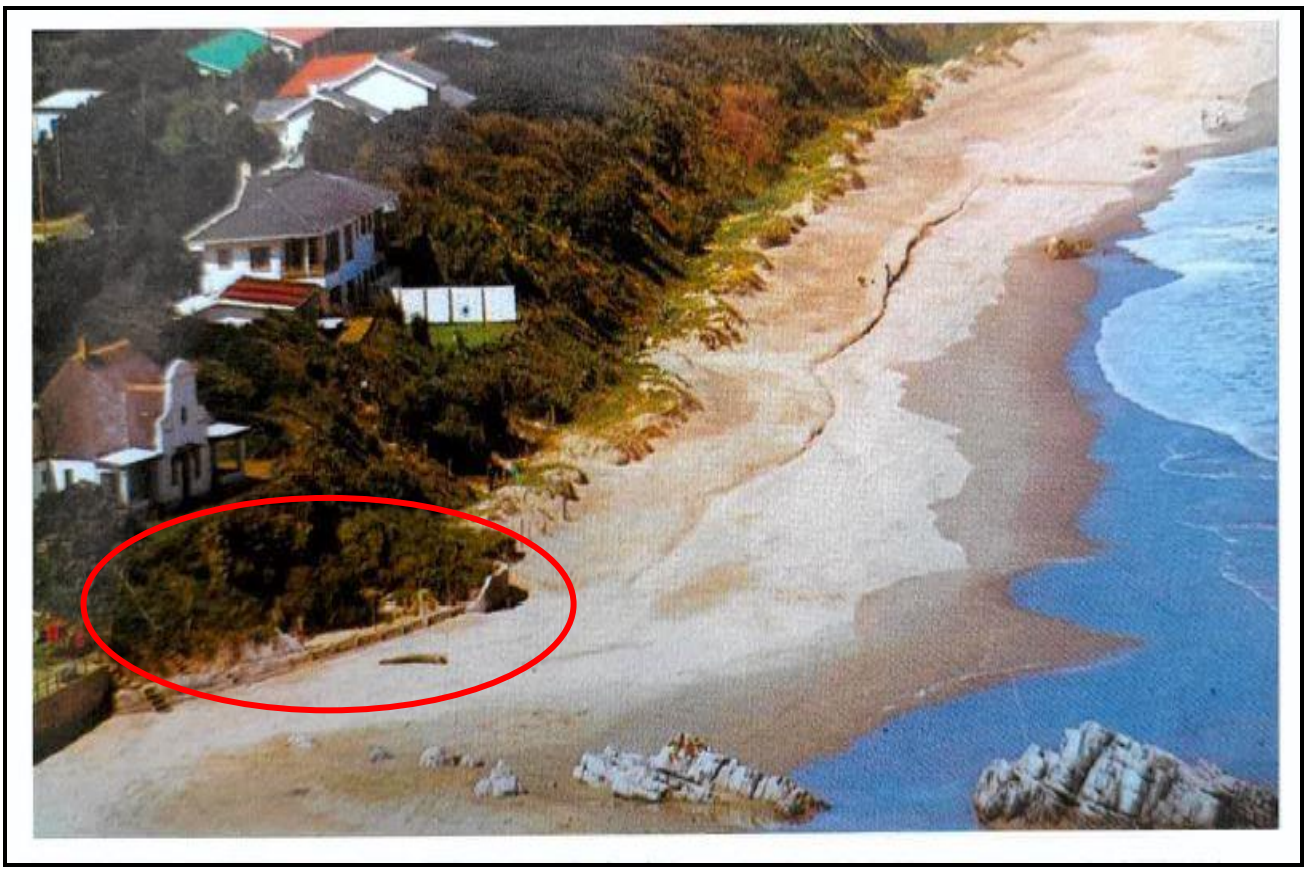

Figure 7: View of the Wilderness Beach showing the full extent of the low dyke and curved reinforced wall.

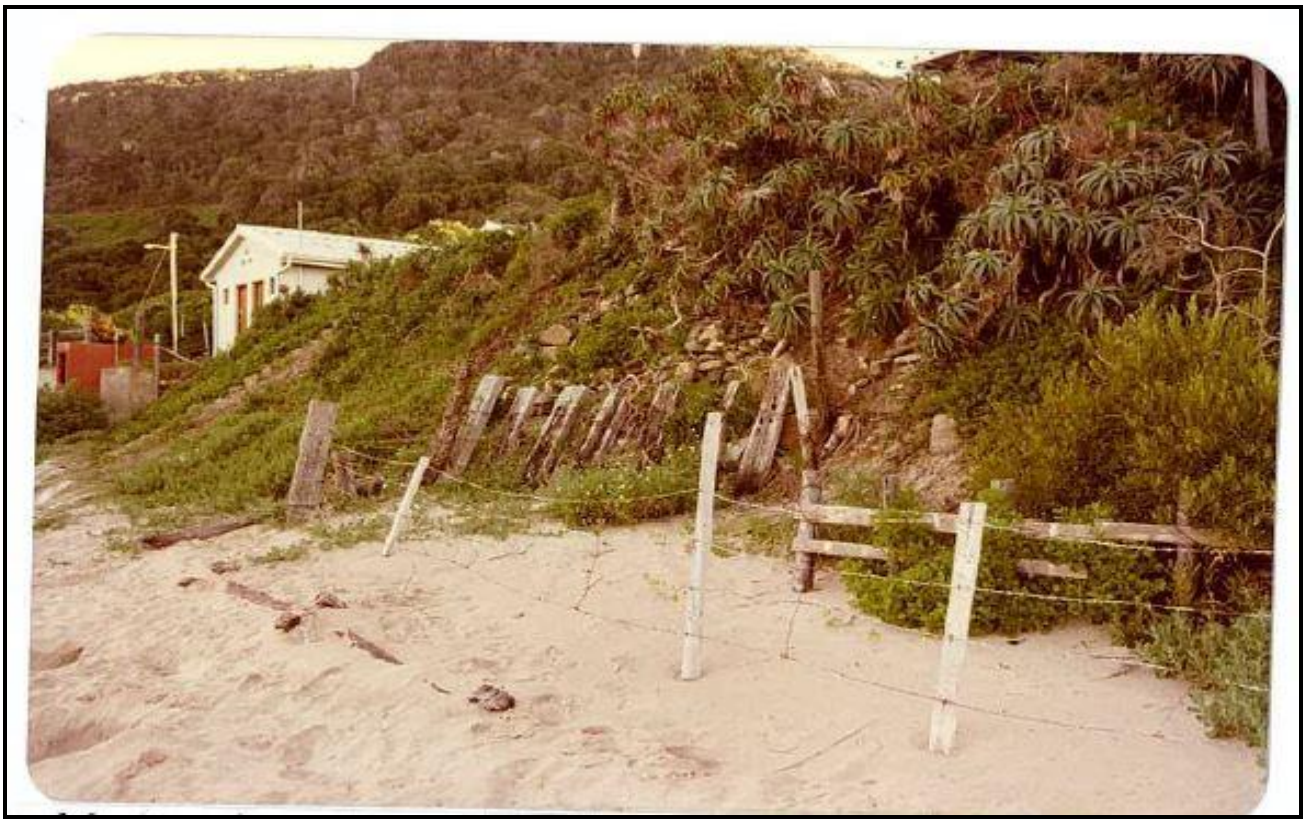

Figure 8: Front view of sand dune showing the top ridge of the low sloping dyke protruding from the sand dune.

- 1986 – Construction of a retaining wall to protect the house and property from extreme high tides, the wall was built on the Southern boundary. See Figure 9 and 10 below.

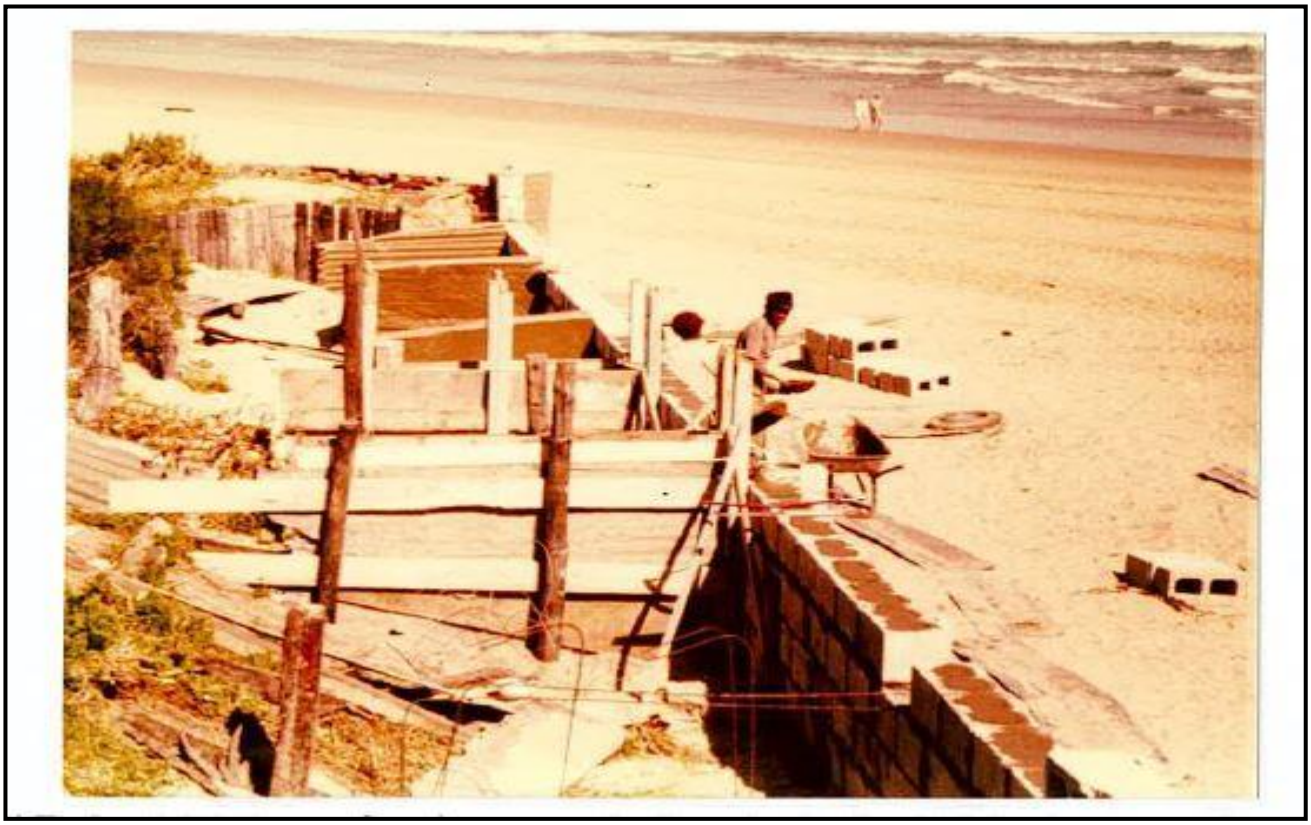

Figure 9: Construction of retaining wall.

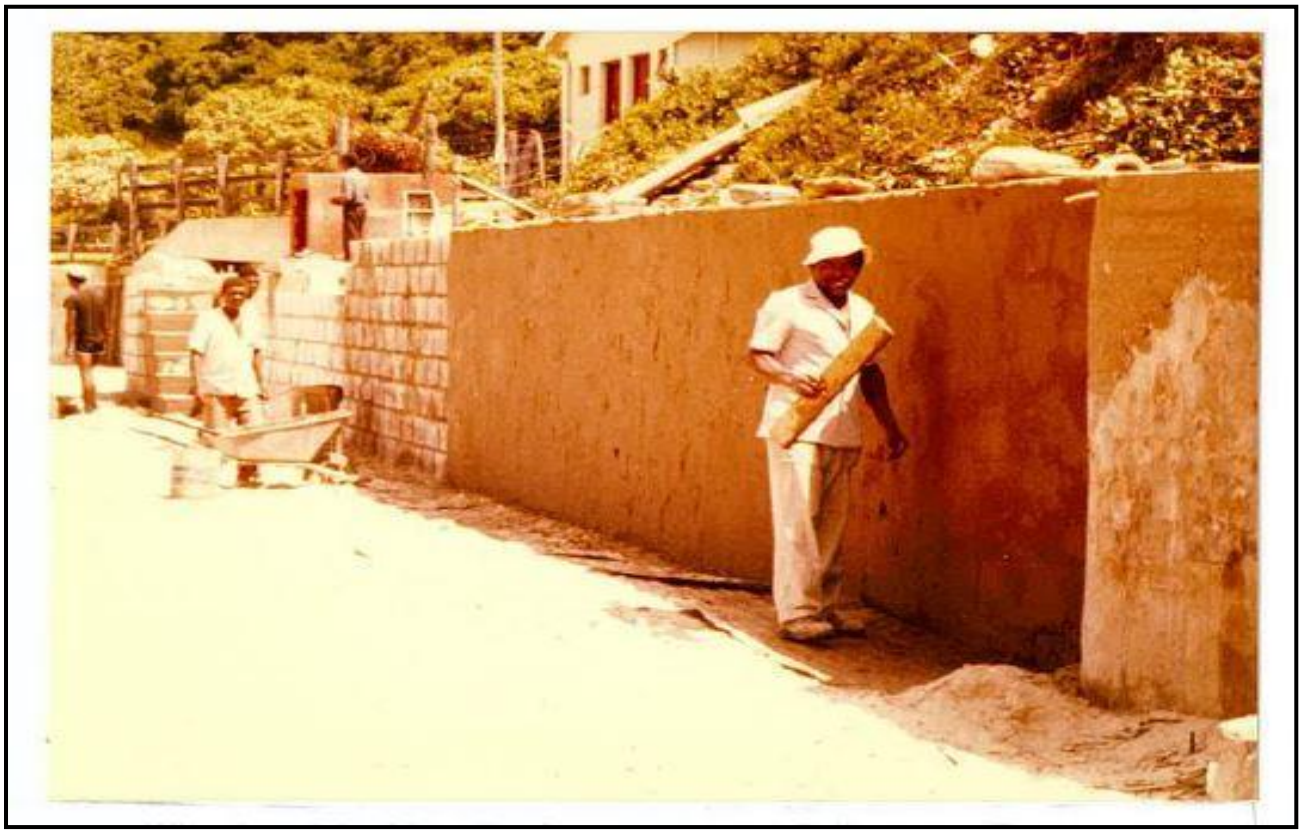

Figure 10: Construction of retaining wall.

- 1987 – Construction of a protection terrace behind the retaining wall, this terrace was backfilled with sand to the level of the wall and was vegetated with indigenous vegetation. See Figure 11 and 12 below. Figure 13 shows vegetation growing on the terrace taken in 1991.

Figure 11: Protected terrace behind retaining wall.

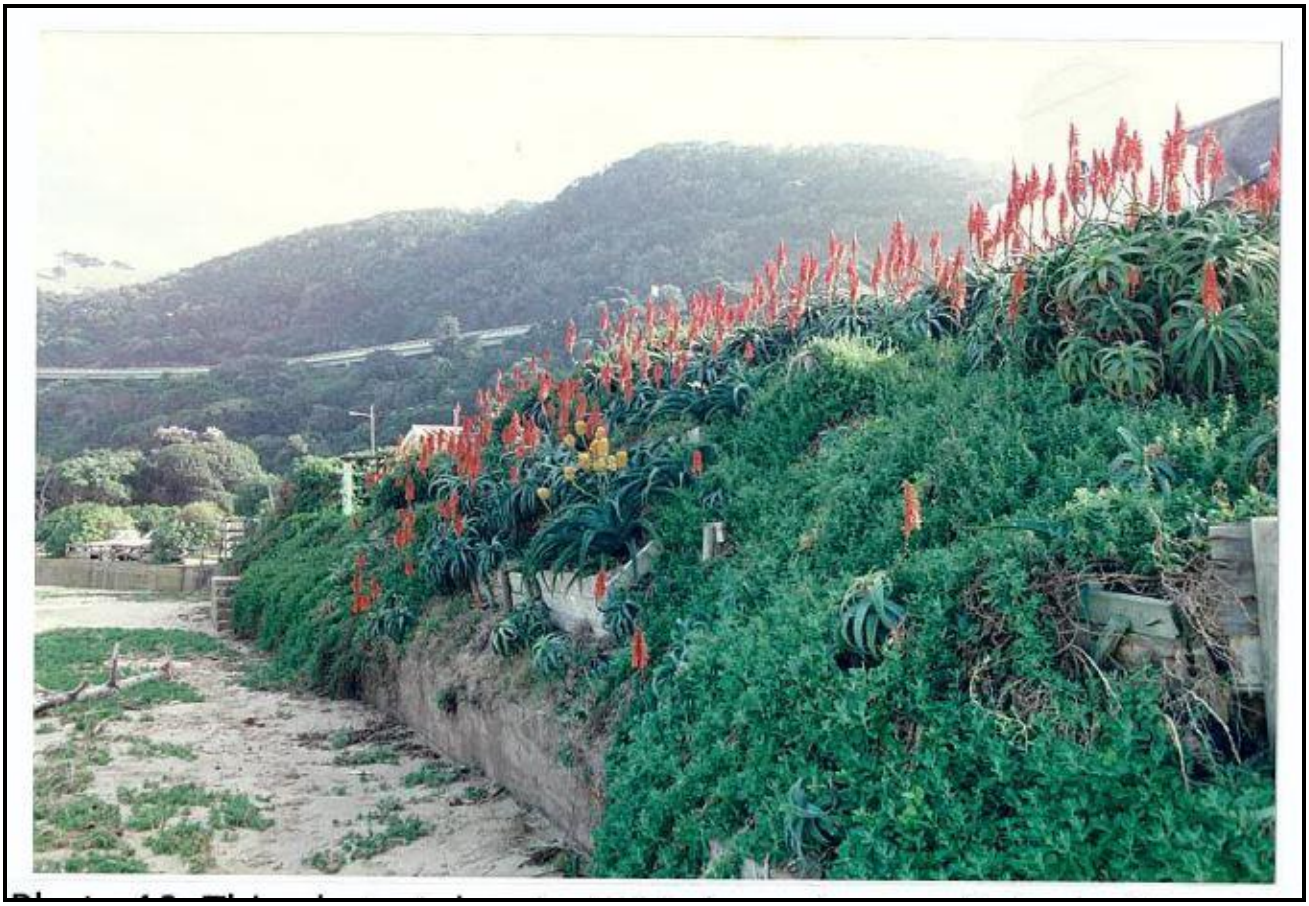

Figure 12: Terrace and retaining wall 1989.

Figure 13: View of indigenous vegetation growing on terrace 1991.

- 1994 - Following a massive high tide event and damage to property protection barriers, wooden poles were used for the installation of another protective barrier to protect the retaining wall and indigenous vegetation (Please also see Appendix J2). See Figure 14 and 15 below.

Figure 14: Poles used to construct barrier.

Figure 15: Construction of barrier.

- 1996 – High sea events damaged the barriers that had been installed (Please also see Appendix J2). Much of the vegetation and sand had been swept away in front of the retaining wall. The owner then installed a wooden gabion along the length of the retaining wall and filled it with sand. See Figure 16 and Figure 17 below.

Figure 16: Wooden gabion being constructed.

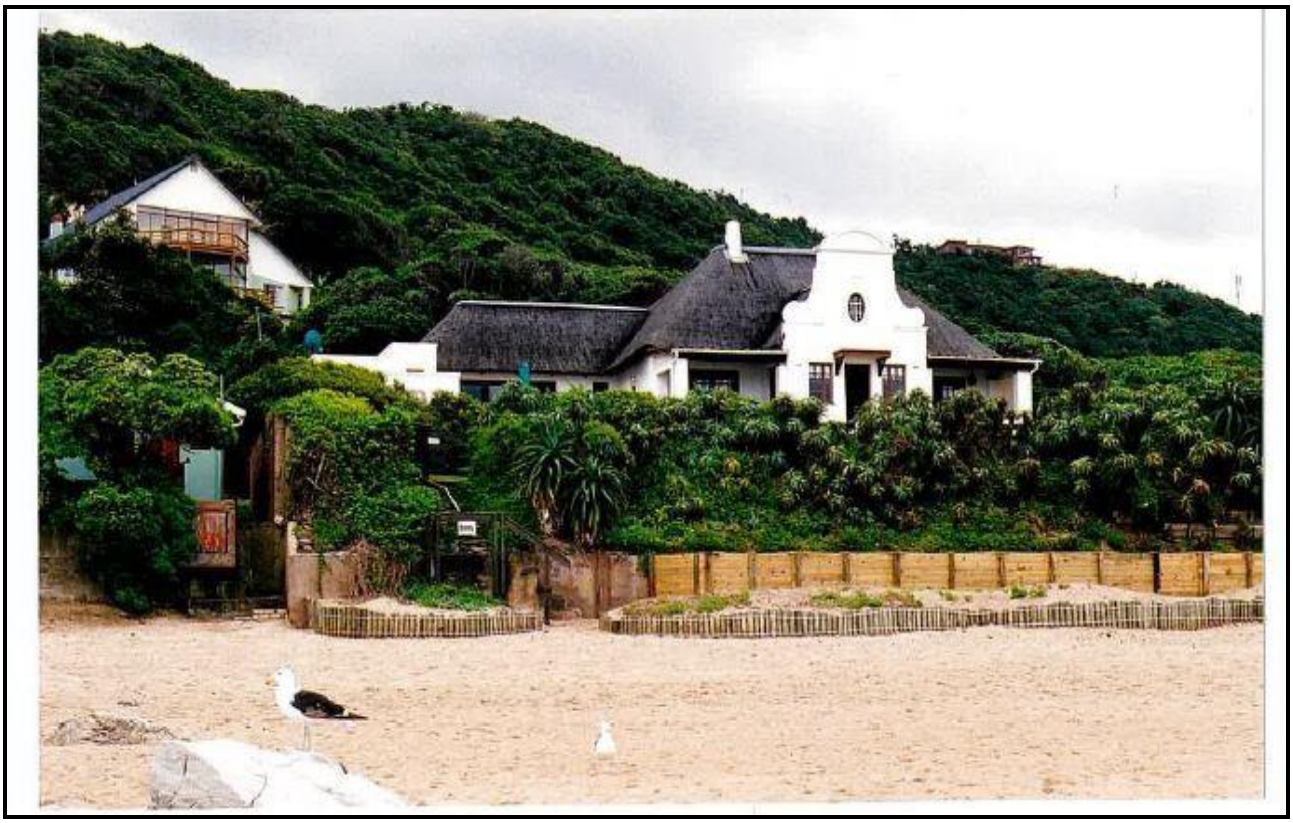

Figure 17: House with wooden gabion installed and beach access.

- On the 1st of September 2003 the Wilderness beach endured extreme high tide events and the sea caused massive devastation to the protective measures at Erf 90 and other properties along the Wilderness beach (Please also see Appendix J2). See Figure 18, 19, 20 and 21 below.

Figure 18: Damage to retaining wall and beach access.

Figure 19: Damage to barrier poles.

Figure 20: Damage to a retaining wall along the Wilderness Beach due to the above mentioned high tide event.

Figure 21: Damage to retaining wall and dune along Wilderness Beach due to the above mentioned high tide event.

- October 2003 – Erf 91 next to Erf 90 had a rock barrier installed in front of it to protect the Erf from the sea. Mr Pallister then got the details of the contractor who had installed the barrier at Erf 91, to do the same for Erf 90. According to Mr Pallister the contractor had stated that permission from the necessary authorities to carry out the work will be granted, however there was no written confirmation of this. In October 2003 the rock revetment and beach access was installed at Erf 90, see Figures 22, 23, 24 and 25 below.

Figure 22: Rock boulders being tipped off onto the beach from the public car park.

Figure 23: Access ramp for front end loader to gain access to the beach from the public picnic area.

Figure 24: Front end loader placing the final few rocks in place and covering them with a layer of beach sand.

Figure 25: Completed rock revetment covered in a layer of beach sand.

- In late December 2008 a tidal surge hit the Leentjiesklip area, the images below show the extent of the tidal surge. It is important to note that during this coastal event, the rock revetment successfully protected Erf 90 and the house at Erf 90 from erosion and potential damage.

Figure 26: Waves hitting the car park at Leentjiesklip, next to Erf 90.

Figure 27: Waves hitting the car park at Leentjiesklip, next to Erf 90.

Figure 28: Extent of the waves at the top of the rock revetment at Erf 90.

- 16 September 2023 - a tidal surge hit the Leentjiesklip area, the image below shows the extent of the tidal surge. It is important to note that during this coastal event, the rock revetment successfully protected Erf 90 and the house at Erf 90 from erosion and potential damage.

Figure 29: Waves hitting the car park at Leentjiesklip, next to Erf 90.

- January 2025 – Upon our site visit following our appointment for the S24G process regarding the rock revetment the Figures below illustrate the current state of the rock revetment and access to the beach:

Figure 30: Eastern view of rock revetment.

Figure 31: Northern view of rock revetment.

Figure 32: Rock revetment and beach access.

Figure 33: Rock revetment and Cape Seashore vegetation type.

Figure 34: Entrance gate to beach access.

Figure 35: Southern view showing well established Cape Seashore vegetation at boundary.

(c) Please provide details of all components of the activity and attach diagrams (e.g. architectural drawings or perspectives, engineering drawings, process flow charts etc.).		
Buildings	YES	**NO**
Provide brief description:		
Infrastructure (e.g. roads, power and water supply/ storage)	YES	**NO**
Provide brief description:		
Processing activities (e.g. manufacturing, storage, distribution)	YES	**NO**
Provide brief description:		
Storage facilities for raw materials and products (e.g. volume and substances to be stored)		
Provide brief description	YES	**NO**
Storage and treatment facilities for solid waste and effluent generated by the project	Yes	**No**
Provide brief description		

(d) Other activities (e.g. water abstraction activities, crop planting activities)	**Yes**	No
Provide brief description		

The rock revetment was constructed in accordance with the design drawing shown below (Figure 24).

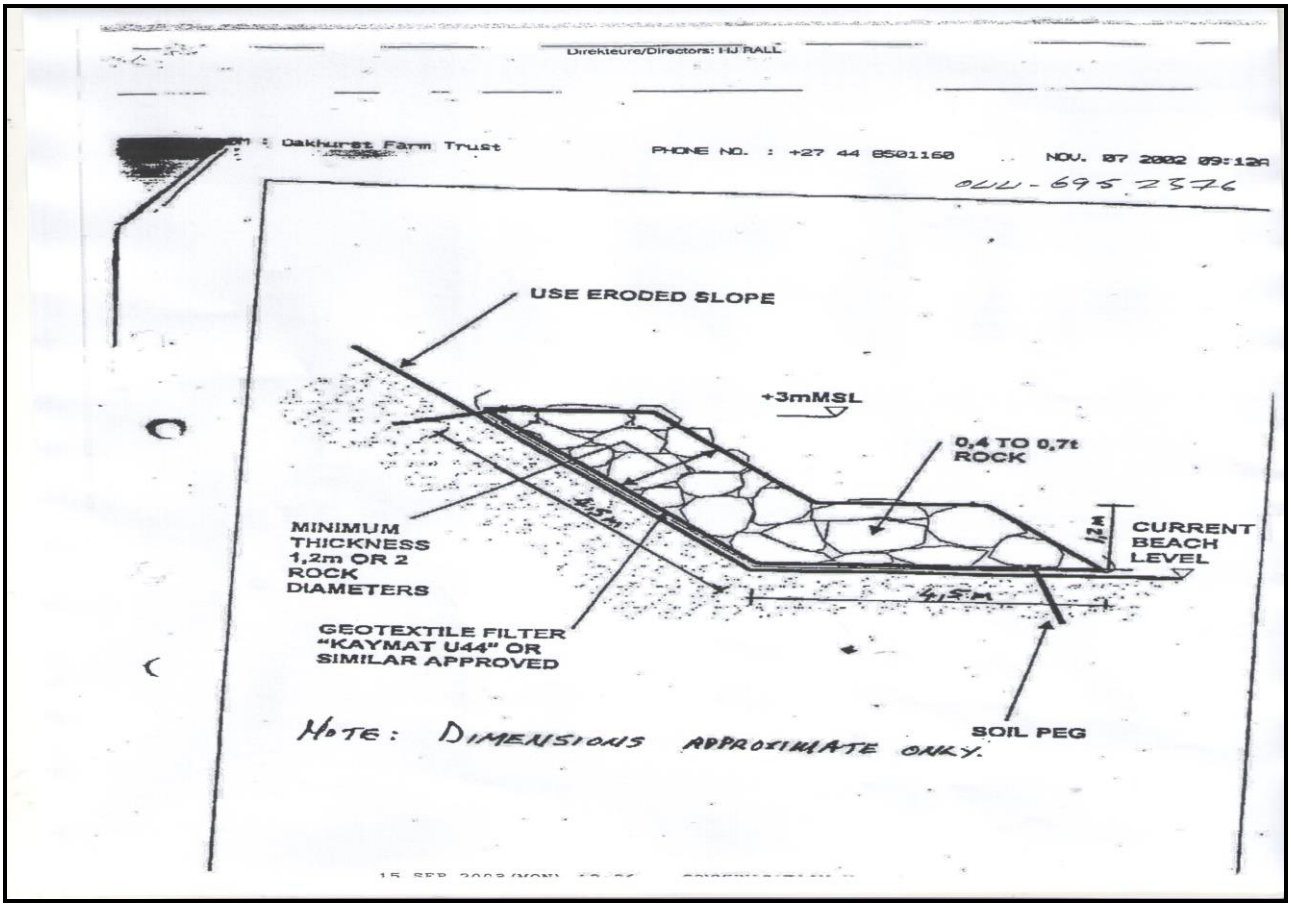

Figure 36: Design drawing for the rock revetment.

The revetment design has been investigated by Consulting Port and Coastal Engineers (CPCE) and they determined that the revetment design as proposed by the contractor is expected to have a capacity to protect the slope at high water spring tide subject to breaking waves up to 2m wave height, which would typify an extreme event. The design includes a geotextile filter which is required to ensure that sand is not removed from inside the revetment, however the vegetation above the +3m MSL level would be available to feed the beach during a major storm.

3. PHYSICAL SIZE OF THE ACTIVITY

Indicate the physical spatial size of the activity as well as associated infrastructure (footprints):	+/- 380	m^2
Indicate the area that has been transformed / cleared to allow for the activity as well as associated infrastructure	+/- 380	m^2
Total area:	**+/- 380**	m^2

4. SITE ACCESS

Was there an existing access road?	**YES**	NO
If NO, what was the distance over which the new access road was built? Please indicate the length and width of the new road.	(Length)	m
	(width)	m
Describe the type of access road constructed:		
Public picnic area was used to create an access ramp for the front end loader to gain access to the beach.		

Please Note:

Indicate the position of the access road on the site plan (See Section 5 below)

5. SITE PHOTOGRAPHS

Colour photographs of the site and its surroundings (taken of the site and from the site), both before (if available) and after the activity commenced, with a description of each photograph, must be attached to this application. 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 past and recent aerial photographs. It should be supplemented with additional photographs of relevant features on the site. Date and source of photographs must be included. Photographs must be attached as an **appendix** to this form.

Please note:

Should the relevant photographs not be included in the application, the application may be deemed insufficient and further information in this regard will be requested.

6. APPLICABLE LEGISLATION, POLICIES AND/OR GUIDELINES

Please list all legislation, policies and/or guidelines that were or are relevant to this activity.

LEGISLATION	ADMINISTERING AUTHORITY	TYPE Permit/ license/ authorisation/comment	DATE (if already obtained):
National Environmental Management Act, 1998 (Act No. 107 of 1998),	Department of Forestry, Fisheries and the Environment (DFFE)	Environmental Authorisation	
2014 Environmental Impact Assessment Regulations, promulgated in terms of Section 24(5) of NEMA (as amended on 07 April 2017)	DFFE	Environmental Authorisation	

National Environmental Management: Integrated Coastal Management Act of 2008	DFFE	Comment	
National Environmental Management: Integrated Coastal Management Act of 2008	DEADP: Oceans & Coasts	Comment	
The Sea-shore Act, 1935	CapeNature	Coastal lease	

POLICY/ GUIDELINES	ADMINISTERING AUTHORITY
Department's Circular EADP 0028/2014 (dated 9 December 2014) on the "One Environmental Management System"	Circular and guidelines consulted and adhered to when undertaking this Basic Assessment Report.
Guidelines on EIA Regulations 2014	Guideline was consulted while compiling the S24G Application.
Guidelines on Public Participation, 2014	Guideline was consulted while compiling the S24G Application.
Guidelines on Need and Desirability, 2013	Guideline was consulted while compiling the S24G Application.
Guidelines on Alternatives, 2014	Guideline was consulted while compiling the S24G Application.
Guideline for Environmental Management Plans (June 2005)	Guideline was consulted while compiling the S24G Application.
Guideline for the Review of Specialist Input in the EIA process (June 2005).	Guideline was consulted while compiling the S24G Application.

7. APPLICATIONS IN TERMS OF NEMA AND SPECIFIC ENVIRONMENTAL MANAGEMENT ACTS ("SEMAs")

If not specifically applied for in terms of this application, does the development require an application for a waste management license in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)?	YES	**NO**
If yes, has an application been submitted to the licensing authority?	YES	NO
Does the proposed project require an application for a water use license in terms of the National Water Act, 1998 (Act No. 36 of 1998)?	YES	**NO**
If yes, has an application been submitted to the licensing authority?	YES	NO
If no, please provide evidence of existing water use rights (if applicable) with this application form.		
Does the proposed project require an application for an atmospheric emissions license in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)?	YES	**NO**
If yes, has an application been submitted to the licensing authority?	YES	NO
Does the proposed project require an application in terms of the National Environmental Management: Integrated Coastal Management Act ("NEM: ICMA")?	**YES**	NO
If yes, has an application been submitted to the relevant competent authority?	YES	**NO**
If yes, provide more details of the application submitted/to be submitted in terms of the NEM: ICMA		

8. APPLICATIONS IN TERMS OF OTHER LEGISLATION

Is any permission, licence or other approval required in terms of any other legislation? (Please tick)	YES	**NO**

If yes, please complete the table below:

Type of approval required (List the applicable legislation & approval required):	Name of the authority responsible for administering the applicable legislation	Application submitted (Yes / No)	Status of application (e.g. pending/ granted/ refused)
NEM: ICMA: Coastal concession or lease	DEADP: Oceans and Coasts	No	

SECTION C: DESCRIPTION OF RECEIVING ENVIRONMENT

Site/Area Description

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

Section C Copy No. (e.g. 1, 2, or 3):

1. THE GEOLOGICAL FORMATIONS UNDERLYING THE SITE (Tick the appropriate box)

GRANITE		QUARTZITE	
SHALE		DOLOMITE	
SANDSTONE		DOLERITE	
OTHER (specify)	**BEACH SAND**		

2. GRADIENT OF THE SITE

Indicate the general gradient of the site(s) (cross out the appropriate box).

Flat	**Flatter than 1:10**	1:10 – 1:5	Steeper than 1:5

3. LOCATION IN LANDSCAPE

Indicate the landform(s) that best describes the site (cross out ("☒") the appropriate boxes).

Ridgeline	Plateau	Side slope of hill/mountain	Closed valley	Open valley	Plain	Undulating plain/low hills	**Dune**	Sea-front	Other
If other, please describe									

4. GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE

4.1 GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE (PRE-COMMENCEMENT)

Is the site(s) located on or near any of the following (cross out ("☒") the appropriate boxes)?

Shallow water table (less than 1.5m deep)	YES	**NO**	UNSURE
Seasonally wet soils (often close to water bodies)	YES	**NO**	UNSURE
Unstable rocky slopes or steep slopes with loose soil	YES	**NO**	UNSURE
Dispersive soils (soils that dissolve in water)	YES	**NO**	UNSURE
Soils with high clay content	YES	**NO**	UNSURE
Any other unstable soil or geological feature	YES	**NO**	UNSURE
An area sensitive to erosion	**YES**	NO	UNSURE

4.2 GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE (POST-COMMENCEMENT)

Shallow water table (less than 1.5m deep)	YES	**NO**	UNSURE
Seasonally wet soils (often close to water bodies)	YES	**NO**	UNSURE
Unstable rocky slopes or steep slopes with loose soil	YES	**NO**	UNSURE
Dispersive soils (soils that dissolve in water)	YES	**NO**	UNSURE
Soils with high clay content	YES	**NO**	UNSURE
Any other unstable soil or geological feature	YES	**NO**	UNSURE
An area sensitive to erosion	**YES**	NO	UNSURE

If any of the answers to the above are "YES" or "unsure", specialist input may be requested by the Department.
(Information in respect of the above will often be available at the planning sections of local authorities. Where it does not exist, the 1:50 000 scale Regional Geotechnical Maps prepared by Geological Survey may also be used).

5. SURFACE WATER

5.1 SURFACE WATER (PRE-COMMENCEMENT)

Indicate the surface water present on and or adjacent to the site and alternative sites (cross out ("☒") the appropriate boxes)?

Perennial River	YES	**NO**	UNSURE
Non-Perennial River	YES	**NO**	UNSURE
Permanent Wetland	YES	**NO**	UNSURE
Seasonal Wetland	YES	**NO**	UNSURE
Artificial Wetland	YES	**NO**	UNSURE
Estuarine / Lagoonal wetland	YES	**NO**	UNSURE

5.2 SURFACE WATER (POST-COMMENCEMENT)

Indicate the surface water present on and or adjacent to the site and alternative sites (cross out ("☒") the appropriate boxes)?

Perennial River	YES	**NO**	UNSURE
Non-Perennial River	YES	**NO**	UNSURE

Permanent Wetland	YES	**NO**	UNSURE
Seasonal Wetland	YES	**NO**	UNSURE
Artificial Wetland	YES	**NO**	UNSURE
Estuarine / Lagoonal wetland	YES	**NO**	UNSURE

6. VEGETATION AND/OR GROUNDCOVER

Please note: The Department may request specialist input/studies depending on the nature of the biodiversity occurring on the site and potential impact(s) of the activity/ies. To assist with the identification of the biodiversity occurring on site and the ecosystem status consult http://bgis.sanbi.org.za or BGIShelp@sanbi.org.za. Information is also available on compact disc ("cd") from the Biodiversity-GIS Unit, Ph (021) 799 8738. This information may be updated from time to time and it is the applicant/ EAP's responsibility to ensure that the latest version is used. A map of the relevant biodiversity information (including an indication of the habitat conditions as per (b) below) and must be provided as an overlay map to the property/site plan as an **appendix** to this form.

6.1 VEGETATION AND/OR GROUNDCOVER (PRE-COMMENCEMENT)

Cross out ("☒") the block **and** describe (where applicable) the vegetation types / groundcover present on the site before commencement of the activity.

Indigenous Vegetation - good condition		Indigenous Vegetation with scattered aliens		Indigenous Vegetation with heavy alien infestation	
Describe the vegetation type above:		Describe the vegetation type above:		Describe the vegetation type above:	
Provide ecosystem status for above:		Provide ecosystem status for above:		Provide Ecosystem status for above:	
Indigenous Vegetation in an ecological corridor or along a soil boundary / interface		Veld dominated by alien species		Distinctive soil conditions (e.g. Sand over shale, quartz patches, limestone, alluvial deposits, termitaria etc.) – describe	
Bare soil		**Building or other structure**		Sport field	
Other (describe below)		Cultivated land		Paved surface	

(a) Highlight the applicable pre-commencement biodiversity planning categories of all areas on site and indicate the reason(s) provided in the biodiversity plan for the selection of the specific area as part of the specific category.

Systematic Biodiversity Planning Category				**If CBA or ESA, indicate the reason(s) for its selection in biodiversity plan**
Critical Biodiversity Area (CBA)	**Ecological Support Area (ESA)**	Other Natural Area (ONA)	No Natural Area Remaining (NNR)	According to the Terrestrial Biodiversity Assessment: a small western section of Erf 90 and the rock revetment intersect with an area mapped as a degraded ESA2, defined as "Areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of PAs or CBAs, and are often vital for delivering ecosystem services". This degraded ESA2 is mapped as a buffer zone around a small non-perennial drainage channel located to the west, serving to maintain the natural flow of this non-perennial stream. Currently, the entire area to the west of Erf 90 contains the parking lots and ablution of the Wilderness Beach Front from where the public may access the beach. This area is separated from the beach by a municipal concrete revetment wall with a small pipe from where water drains over the beach into the ocean. Importantly therefore, this part of the drainage channel has been irreversibly modified to flow

				beneath the Wilderness Beach Front parking area prior to installation of the rock revetment. Given this modification of the drainage channel therefore, this part, including Erf 90 and the rock revetment, fails to meet the criteria of an ESA2. To this end, the presence of the rock revetment on Erf 90 does not have any impact on this freshwater drainage channel or the buffer surrounding it, and therefore has no impact on this terrestrial biodiversity feature. **It is important to note that at the time of the Terrestrial Biodiversity Assessment the Western Cape Biodiversity Spatial Plan (WCBSP) of 2017 was still applicable. With regards to the WCSBP 2023, the area mentioned above is not mapped as ESA2 and is no longer applicable.**

(b) Highlight and describe the habitat condition on site.

Habitat Condition	Percentage of habitat condition class (adding up to 100%)	Description and additional Comments and Observations (including additional insight into condition, e.g. poor land management practises, presence of quarries, grazing/harvesting regimes etc).
Natural	100%	Cape Seashore vegetation and coastline.
Near Natural (includes areas with low to moderate level of alien invasive plants)	%	
Degraded (includes areas heavily invaded by alien plants)	%	
Transformed (includes cultivation, dams, urban, plantation, roads, etc)	%)	

(c) Complete the table to indicate:
(i) the type of vegetation, including its ecosystem status, that was previously present on the site; and
(ii) whether an aquatic ecosystem was previously present on site.

Terrestrial Ecosystems		Aquatic Ecosystems						
Ecosystem threat status as per the National Environmental Management: Biodiversity Act,2004 (Act No. 10 of 2004)	Critical	Wetland (including rivers, depressions, channelled and un-channelled wetlands, flats, seeps pans, and artificial wetlands)			Estuary		Coastline	
	Endangered							
	Vulnerable							
	Least Threatened	YES	**NO**	UNSURE	YES	**NO**	**YES**	NO

(d) Please provide a description of the vegetation type and/or aquatic ecosystem present on site, including any important biodiversity features/information identified on site (e.g. threatened species and special habitats)

According to the Terrestrial Biodiversity Assessment:

The small terrace north of the rock revetment harbours a dense incidence of Tickberry (Osteospermum moniliferum) and Dune Spinach (Tetragonia decumbens) with single incidences of the Cape Aloe (Aloe ferox) and Krantz Aloe (Aloe arborescens) also noted. These botanical elements are in line with the mapped vegetation type of Cape Seashore Vegetation (VEGMAP 2024 Beta) which is currently classified as a "Least-Threatened" ecosystem type (Subsection 2.2), and has a large Remaining Ecosystem Extent (REE) of 98%. To this end, the area of the rock revetment harbours the natural vegetation representative of the broader landscape and does not contain any non-native or invasive botanical elements.

Only three faunal species (the Kelp Gull, Cape Wagtail and Green-eyed Vagrant) were recorded in vicinity of the rock revetment (Figure 8), all of which are currently classified as "Least Concern" by the IUCN. Given the placement of the revetment in an urban environment next to busy roads, the Wilderness Beach Front and the beach area, faunal diversity appears highly impaired with only single species present. To this end, Erf 90 does not intersect with any notable faunal features or -habitats and is of a very low sensitivity from a faunal perspective.

From botanical and faunal perspectives, both Erf 90 and the southern rock revetment intersect areas of very low sensitivity with a natural vegetation profile of "Least Concern" and very low faunal diversity and abundances

6.2 VEGETATION AND/OR GROUNDCOVER (POST-COMMENCEMENT)

Cross out ("☒") the block **and** describe (where required) the vegetation types / groundcover present on the site after commencement of the activity.

Indigenous Vegetation - good condition	**X**	Indigenous Vegetation with scattered aliens		Indigenous Vegetation with heavy alien infestation	
Describe the vegetation type above: The small terrace north of the rock revetment harbours a dense incidence of Tickberry (Osteospermum moniliferum) and Dune Spinach (Tetragonia decumbens) with single incidences of the Cape Aloe (Aloe ferox) and Krantz Aloe (Aloe arborescens) also noted. These botanical elements are in line with the mapped vegetation type of Cape Seashore Vegetation (VEGMAP 2024 Beta) which is currently classified as a "Least-Threatened" ecosystem type (Subsection 2.2), and has a large Remaining Ecosystem Extent (REE) of 98%. To this end, the area of the rock revetment harbours the natural vegetation representative of the broader landscape and does not contain any		Describe the vegetation type above:		Describe the vegetation type above:	

non-native or invasive botanical elements.		
Provide ecosystem status for above: Least Threatened	~~Provide ecosystem status for above:~~	~~Provide Ecosystem status for above:~~
~~Indigenous Vegetation in an ecological corridor or along a soil boundary / interface~~	~~Veld dominated by alien species~~	~~Distinctive soil conditions (e.g. Sand over shale, quartz patches, limestone, alluvial deposits, termitaria etc.) – describe~~
~~Bare soil~~	**Building or other structure**	~~Sport field~~
~~Other (describe below)~~	~~Cultivated land~~	~~Paved surface~~

(a) Highlight and describe the post-construction habitat condition on site.

Habitat Condition	Percentage of habitat condition class (adding up to 100%)	Description and additional Comments and Observations (including additional insight into condition, e.g. poor land management practises, presence of quarries, grazing/harvesting regimes etc).
Natural	100%	Vegetation type on site has a large Remaining Ecosystem Extent (REE) of 98%. To this end, the area of the rock revetment harbours the natural vegetation representative of the broader landscape and does not contain any non-native or invasive botanical elements.
Near Natural (includes areas with low to moderate level of alien invasive plants)	%	
Degraded (includes areas heavily invaded by alien plants)	%	
Transformed (includes cultivation, dams, urban, plantation, roads, etc)	%	

(b) How have the vegetation and/or aquatic ecosystem(s) present on site (including any important biodiversity features identified on site (e.g. threatened species and special habitats)) been affected by the commencement of the listed activity(ies)?

According to the terrestrial Biodiversity Assessment:

Installation of the rock revetment would have been unlikely to impact on terrestrial biodiversity features in the landscape for several reasons:

- The overall footprint of the rock revetment is very small (~380m^2);
- The revetment is constructed of natural materials (rocks) which appears to originate from the surrounding area;
- Soils used to in-fill the revetment is characteristic of the surrounding area and harbours natural vegetation elements similar to that found in the surrounding landscape;
- The revetment is located at the edge of the residential area towards the beach front which harbours very few faunal elements and therefore a highly impaired faunal diversity;
- The revetment does not impact on the degraded ESA2 as it does not interfere with the non-perennial drainage line to the west which traverses the Wilderness Beach Front concrete revetment wall through a small pipe.

Taken together therefore, the impact of this rock revetment on the receiving environment would have been minimal and has led to minimal or no loss or degradation of ecological processes or biodiversity patterns in either local or regional contexts.

6.3 VEGETATION / GROUNDCOVER MANAGEMENT

(a) Describe any mitigation/management measures that were adopted and the adequacy of these:

An existing access road was used to access the site so no disturbance regarding site access was created.

The revetment was constructed of natural materials (rocks) which appears to originate from the surrounding area.

The soils used to in-fill the revetment is characteristic of the surrounding area and harbours natural vegetation elements similar to that found in the surrounding landscape.

The entire revetment was covered in sand and vegetated with indigenous vegetation which conforms to the existing vegetation type – Cape Seashore vegetation.

7. LAND USE OF THE SITE (PRE-COMMENCEMENT)

Please note: The Department may request specialist input/studies depending on the nature of the land use character of the area and potential impact(s) of the activity/ies.

Untransformed area	**Low density residential**	Medium density residential	High density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	Medium industrial	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	Tourism & Hospitality facility
Open cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	Dam or reservoir
Hospital/medical centre	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	Agriculture	River, stream or wetland	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):				

(a) Please provide a description.

8. LAND USE CHARACTER OF SURROUNDING AREA (PRE-COMMENCEMENT)

Cross out ("☒") the block that reflects the past land uses and/or prominent features that occur/red within +/- 500m radius of the site and neighbouring properties if these are located beyond 500m of the site. **Please note:** The Department may request specialist input/studies depending on the nature of the land use character of the area and impact(s) of the activity/ies.

Untransformed area	**Low density residential**	Medium density residential	High density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	Medium industrial	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	Tourism & Hospitality facility
Open cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	Dam or reservoir
Hospital/medical centre	School	Tertiary education facility	Church	Old age home

Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	Agriculture	River, stream or wetland	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):				

9. LAND USE CHARACTER OF SURROUNDING AREA (POST-COMMENCEMENT)

Cross out ("☒") the block that reflects the current land uses and/or prominent features that occur(s) within +/- 500m radius of the site and neighbouring properties if these are located beyond 500m of the site. **Please note:** The Department may request specialist input/studies depending on the nature of the land use character of the area and impact(s) of the activity/ies.

Untransformed area	Low density residential	Medium density residential	**High density residential**	Informal residential
Retail	Commercial & warehousing	Light industrial	Medium industrial	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	**Tourism & Hospitality facility**
Open cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	Dam or reservoir
Hospital/medical centre	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	Agriculture	River, stream or wetland	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):				

10. SOCIO-ECONOMIC CONTEXT

10.1 SOCIO-ECONOMIC CONTEXT (PRE-COMMENCEMENT)

Describe the pre-commencement social and economic characteristics of the community in order to provide baseline information.

Uncertain as historical records are unclear however according to www.city-facts.com/wilderness-western-cape/population the population was 301 in 1975.

10.2 SOCIO-ECONOMIC CONTEXT (POST-COMMENCEMENT)

Describe the post commencement social and economic characteristics of the community in order to determine any change. Where differences between pre- and post-commencement exist, state which are as a result of the activity(ies) for which rectification is being applied for.

Currently the Wilderness population is estimated to be 6164. The tables below show demographic statistics for ethnicity, sex and age distribution and languages in Wilderness.

Table 1: Ethnic Groups

Group	Percentage
Black African	12,0%
Coloured	47,2%
Indian/Asian	0,6%
White	38,5%
Other	1,8 %

Table 2: Sex and Age Distribution

Age	Males	Females
0-4	3,6%	3,2%
5-9	3,4%	2,9%
10-14	3,3%	3,2%
15-19	3,6%	3,2%
20-24	2,7%	2,6%
25-29	3,4%	3,4%
30-34	3,2%	2,8%
35-39	3,3%	3,5%
40-44	3,2%	3,9%
45-49	3,4%	3,6%
50-54	3,6%	3,7%
55-59	2,9%	3,4%
60-64	3,3%	3,3%
65-69	2,8%	3,3%
70-74	2,4%	2,1%
75-79	1,1%	1%
80-84	0,5%	0,7%
85+	0,3%	0,3%

Table 3: Languages

Language	Percentage
Afrikaans	68,5%
English	23,7%
IsiNdebele	0,4%
IsiXhosa	4,9%
IsiZulu	0,1%
Sepedi	0%
Sesotho	0,3%
Setswana	0,4%
Sign Language	0,1%
SiSwati	0%
Tshivenda	0%
Xitsonga	0,2%
Other	1,3%

11. HISTORICAL AND CULTURAL ASPECTS

(a) Please be advised that every application for Environmental Authorisation including an application for a Waste Management Licence, must include, where applicable the investigation, assessment and evaluation of the impact of any proposed listed or specified activity on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), excluding the national estate contemplated in section 3(2)(i)(vi) and (vii) of that Act.

Please be further advised that if section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), is applicable to your application, then you are requested to furnish this Department with written comment from Heritage Western Cape as part of your public participation process. Section 38 of the Act states as follows: "*38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as-*

(a) the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;
(b) the construction of a bridge or similar structure exceeding 50m in length;
(c) any development or other activity which will change the character of a site-
(i) exceeding 5 000 m² in extent; or
(ii) involving three or more existing erven or subdivisions thereof; or
(iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
(iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;
(d) the re-zoning of a site exceeding 10 000 m² in extent; or
(e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development."

(b) The impact on any national estate referred to in section 3(2), excluding the national estate contemplated in section 3(2)(i)(vi) and (vii), of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), must also be investigated, assessed and evaluated. Section 3(2) states as follows: "*3(2) Without limiting the generality of subsection (1), the national estate may include—*

(a) places, buildings, structures and equipment of cultural significance;
(b) places to which oral traditions are attached or which are associated with living heritage;
(c) historical settlements and townscapes;
(d) landscapes and natural features of cultural significance;
(e) geological sites of scientific or cultural importance;
(f) archaeological and palaeontological sites;
(g) graves and burial grounds, including—
(i) ancestral graves;
(ii) royal graves and graves of traditional leaders;
(iii) graves of victims of conflict;
(iv) graves of individuals designated by the Minister by notice in the Gazette;
(v) historical graves and cemeteries; and
(vi) other human remains which are not covered in terms of the Human Tissue Act, 1983 (Act No. 65 of 1983);
(h) sites of significance relating to the history of slavery in South Africa;
(i) movable objects, including—
(i) objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens;
(ii) objects to which oral traditions are attached or which are associated with living heritage;
(iii) ethnographic art and objects;
(iv) military objects;
(v) objects of decorative or fine art;
(vi) objects of scientific or technological interest; and
(vii) books, records, documents, photographic positives and negatives, graphic, film or video material or sound recordings, excluding those that are public records as defined in section 1(xiv) of the National Archives of South Africa Act, 1996 (Act No. 43 of 1996)."

Is section 38 of the National Heritage Resources Act, 1999, applicable to the development?		YES	**NO**
		UNCERTAIN	
If YES, explain:			
Did/does the development impact on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999?		YES	**NO**
		UNCERTAIN	
If YES, explain:			
Was any building or structure older than 60 years affected in any way?	YES	**NO**	UNCERTAIN
If YES, explain:			

Please Note:

If uncertain, the Department may request that specialist input be provided. If, yes, a copy of the Notice of Intent submitted to Heritage Western Cape must be submitted with this form.

12. COASTAL ASPECTS (SEAFRONT/SEA ENVIRONMENT)

(a) Is the site(s) located within any of the following areas? (highlight the appropriate boxes).
If the site or alternative site is closer than 100m to such an area, please provide the approximate distance in (m).

AREA	YES	NO	UNSURE	If "YES": Distance to nearest area (m)
An area within 100m of the high water mark of the sea	**YES**	NO	UNSURE	
An area within 100m of the high water mark of an estuary/lagoon	YES	**NO**	UNSURE	
An area within the littoral active zone	**YES**	NO	UNSURE	
An area in the coastal public property	**YES**	NO	UNSURE	
Major anthropogenic structures	YES	**NO**	UNSURE	
An area within a Coastal Protection Zone	**YES**	NO	UNSURE	
An area seaward of the coastal management line	**YES**	NO	UNSURE	
An area within the high risk zone (20 years)	**YES**	NO	UNSURE	
An area within the medium risk zone (50 years)	**YES**	NO	UNSURE	
An area within the low risk zone (100 years)	**YES**	NO	UNSURE	
An area below the 5m contour	**YES**	NO	UNSURE	
An area within 1km from the high water mark of the sea	**YES**	NO	UNSURE	
A rocky beach	YES	**NO**	UNSURE	
A sandy beach	**YES**	NO	UNSURE	

(b) If any of the answers to the above is "YES" or "UNSURE", specialist input may be requested by the Department. (The 1:50 000 scale Regional Geotechnical Maps prepared by Geological Survey may also be used).

13. REGIONAL PLANNING CONTEXT

Is the activity permitted in terms of the property's existing land use rights?	YES	**NO**	Please explain
The revetment was constructed outside of the Erf 90 property boundary on RE/158 which is deemed coastal public property.			
Will the activity be in line with the following?			
Provincial Spatial Development Framework (PSDF)	YES	**NO**	Please explain
Urban edge / Edge of Built environment for the area	YES	**NO**	Please explain
The rock revetment does not occur within the George Municipality's urban edge as determined by the George Public Viewer.			
Integrated Development Plan of the Local Municipality	YES	**NO**	Please explain
Spatial Development Framework of the Local Municipality	YES	**NO**	Please explain
Approved Structure Plan of the Municipality	YES	**NO**	Please explain

An Environmental Management Framework (EMF) adopted by the Department	YES	**NO**	Please explain
Any other Plans	YES	**NO**	Please explain

SECTION D: NEED AND DESIRABILITY

Please Note: Before completing this section, first consult this Department's *Guideline on Need and Desirability* (March 2013) available on the Department's website (**http://www.capegateway.gov.za/eadp**).

1. Was the activity permitted in terms of the property's land use rights at the time of commencement?	YES	**NO**	Please explain
The rock revetment was constructed outside of the Erf 90 property boundary.			

2. Was the activity in line with the following?			
(a) Provincial Spatial Development Framework (PSDF)	YES	**NO**	Please explain
The PSDF was adopted in 2009, however the commencement and completion of the rock revetment occurred in October 2003.			
(b) Urban edge / Edge of Built environment for the area	YES	**NO**	Please explain
According to George Public Viewer the rock revetment does not occur within the urban edge however DEADP has confirmed in their Pre-Application – Information Requirements letter (Ref: 14/2/4/1/D2/54/0007/25) that Erf 90 and the area of the rock revetment is delineated to be within an urban area as defined in the NEMA EIA Regulations, 2014 (as amended).			
(c) Integrated Development Plan and Spatial Development Framework of the Local Municipality (e.g. would the approval of this application have compromised the integrity of the existing approved and credible municipal IDP and SDF?).	YES	**NO**	Please explain
(d) Approved Structure Plan of the Municipality	YES	**NO**	Please explain

(e) An Environmental Management Framework (EMF) adopted by the Department (e.g. Would the approval of this application have compromised the integrity of the existing environmental management priorities for the area and if so, can it be justified in terms of sustainability considerations?)	YES	**NO**	Please explain
EMFs were enacted first enacted in 2006, whereas the revetment was constructed in October 2006.			
(f) Any other Plans (e.g. Guide Plan)	YES	**NO**	Please explain

3. Was the land use (associated with the activity for which rectification is sought) considered within the timeframe intended by the existing approved Spatial Development Framework (SDF) agreed to by the relevant environmental authority (i.e. was the development in line with the projects and programmes identified as priorities within the relevant IDP)?	YES	**NO**	Please explain

4. Should development, or if applicable, expansion of the town/area concerned in terms of this land use (associated with the activity being applied for) have occurred here when activities commenced?	YES	**NO**	Please explain

5. Did the community/area need the activity and the associated land use concerned (was it a societal priority)? (This refers to the strategic as well as local level (e.g. development is a national priority, but within a specific local context it could be inappropriate.)	**YES**	NO	Please explain
Temporary job opportunities were created during the process of constructing the revetment, additionally the house is used as a guesthouse which provides employment opportunities to guesthouse staff and contributes to tourism and attraction of the popular tourist destination Leentjiesklip. If the rock revetment had not been constructed, alternative measures would have been used (as done in the past) to protect the house at Erf 90. This could have been weaker or poorer measures such as the wooden gabions, which would be constantly damaged after heavy storm events and cause debris on the beach. Alternatively, more drastic measures could have been used such as that of a vertical wall which would have required a great deal of disturbance to be constructed and would have had a significant visual impact compared to the vegetated rock revetment. If no measures were implemented, coastal waves and tidal surges would have caused significant erosion of the foredune at Erf 90, which could have undermined the house and resulted in significant damage and subsequent loss of the house at Erf 90 over time.			

6. Were the necessary services with adequate capacity available (at the time of commencement), or was additional capacity created to cater for the development? (Confirmation by the relevant Municipality in this regard must be attached to the Application Form / additional information as an **appendix**, where applicable.)	YES	**NO**	Please explain
There were no services required from the Local Municipality.			

7. Is/was this development provided for in the infrastructure planning of the municipality, and if not what was/will the implication be on the infrastructure planning of the municipality (priority and placement of services and opportunity costs)? (Comment by the relevant Municipality in this regard must be attached to the Application Form / additional information as an **appendix**, where applicable.)	YES	**NO**	Please explain
There was no impact on the Local Authority infrastructure planning, the structure protects the existing house.			

8. Was this project part of a national programme to address an issue of national concern or importance?	YES	**NO**	Please explain
This was not part of any identified project.			

9. Did location factors favour this land use (associated with the activity applied for) at this place? (This relates to the contextualisation of the land use on this site within its broader context.)	**YES**	NO	Please explain
Because of the location of the house at Erf 90 being so close to the ocean and therefore susceptible to erosion from tidal waves and surges, the revetment was installed as a protection measure.			

10. How did/does the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas (built and rural/natural environment)?	YES	**NO**	Please explain
The construction of the rock revetment had no significant impacts on sensitive natural or cultural			

areas. The structure safely harbours indigenous vegetation which was previously washed away before the construction of the rock revetment and therefore benefits the natural environment. Dr. Jacobus H. Visser from Blue Skies Research determined the following regarding the vegetation surrounding the rock revetment:

The study area encompasses the buildings and garden on Erf 90, with the rock revetment located over the southern edge and constructed with natural materials (rocks) similar to that found in the surrounding landscape. The small terrace north of the rock revetment harbours a dense incidence of Tickberry (*Osteospermum moniliferum*) and Dune Spinach (*Tetragonia decumbens*) with single incidences of the Cape Aloe (*Aloe ferox*) and Krantz Aloe (*Aloe arborescens*) also noted. These botanical elements are in line with the mapped vegetation type of Cape Seashore Vegetation (VEGMAP 2024 Beta) which is currently classified as a "Least-Threatened" ecosystem type (Subsection 2.2), and has a large Remaining Ecosystem Extent (REE) of 98%. To this end, the area of the rock revetment harbours the natural vegetation representative of the broader landscape and does not contain any non-native or invasive botanical elements.

11. How did/does the development impact on people's health and wellbeing (e.g. in terms of noise, odours, visual character and sense of place, etc.)?	**YES**	NO	Please explain
The rock revetment does not have any noise, odours, or other characteristics that will affect people's health and wellbeing. The revetment houses indigenous vegetation, which was previously washed away along with the previous protection measures, resulting in debris and rubble on the beach, as well as the loss of vegetation which affected the visual character and sense of place negatively.			

12. Did/does the proposed activity or the land use associated with the activity applied for, result in unacceptable opportunity costs?	YES	**NO**	Please explain
The revetment has been in place since 2003 and the entire revetment has been vegetated with indigenous vegetation therefore it did not result in unacceptable opportunity costs.			

13. What were the cumulative impacts (positive and negative) of the land use associated with the activity applied for?	YES	**NO**	Please explain
According to the Terrestrial Biodiversity Assessment the cumulative impacts prior to mitigation for the construction of the rock revetment were negligible.			

14. Is/was the development the best practicable environmental option for this land/site?	**YES**	NO	Please explain
The revetment has been in place for more than 20 years and is completely vegetated with indigenous vegetation which conforms to the vegetation type occurring in the area (Cape Seashore Vegetation) the structure is also in good condition, and it is functional. The beach has also not been detrimentally affected by its presence.			

15. What are/were the benefits to society in general and to the local communities?	Please explain
Temporary job opportunities during construction would have benefited labourers, the rock revetment also provides protection to the existing indigenous dune vegetation, the house which is of heritage significance at Erf 90, the adjacent property at Erf 91, and the public car park seawall.	

16. Any other need and desirability considerations related to the activity?	Please explain
When considering the environmental context within which the revetment occurs, the associated coastal processes and the possible future implications of global climate change, the existing structure is well constructed and remains functional. It is capable of withstanding extreme storm events which could become more prevalent in the future in accordance with global climate change. The structure in this sense provides protection to the existing dune vegetation, the house which is of heritage significance at Erf 90, the adjacent property at Erf 91, and the public car park seawall.	

17. Please describe how the general objectives of Integrated Environmental Management as set out in section 23 of NEMA were taken into account:
the general objectives of Integrated Environmental Management as set out in section 23 of NEMA: "(2) The general objective of integrated environmental management is to- (a) promote the integration of the principles of environmental management set out in section 2 into the making of all decisions which may have a significant effect on the environment;

(b) identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage, the risks and consequences and alternatives and options for mitigation of activities, with a view to minimising negative impacts, maximising benefits, and promoting compliance with the principles of environmental management set out in section 2;
(c) ensure that the effects of activities on the environment receive adequate consideration before actions are taken in connection with them;
(d) ensure adequate and appropriate opportunity for public participation in decisions that may affect the environment;
(e) ensure the consideration of environmental attributes in management and decision-making which may have a significant effect on the environment; and
(f) identify and employ the modes of environmental management best suited to ensuring that a particular activity is pursued in accordance with the principles of environmental management set out in section 2.
(3) The Director-General must coordinate the activities of organs of state referred to in section 24 (1) and assist them in giving effect to the objectives of this section and such assistance may include training, the publication of manuals and guidelines and the co-ordination of procedures."

The general objectives of NEMA were not specifically taken into account by the applicant when he commissioned the construction of the revetment however, indirectly using an existing access road to provide the rock boulders for the site, and by vegetating the revetment with indigenous vegetation which conforms to the vegetation type of the area (Cape Seashore Vegetation). The use of an existing access road can be viewed as adhering to Section 23 (2) objectives (a), (b), (c), (e) and (f). Vegetation the rock revetment can be viewed as adhering to Section 23 (2) objectives (a), (b), (c), (e) and (f). Some of the general objectives of NEMA were therefore unintentionally applied to the activities as they overlap with best practices.

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

(2) Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably.

The rock revetment was constructed as a protective measure, to protect the house situated at Erf 90 from coastal waves and tidal surges. Without the rock revetment (or other protective measures) the house would have been subject to these costal waves and tidal surges, and possible undermined and damaged.

(3) Development must be socially, environmentally and economically sustainable.

The rock revetment has been in place since 2003 and has not had any negative or detrimental effects on the surrounding community or environment. It also does not incur any costs apart from the initial capital expenditure for construction and vegetation of the revetment.

(4) (a) Sustainable development requires the consideration of all relevant factors including the following:
(i) That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied;

Impacts to biodiversity during the construction of the rock revetment were minimised by using an existing access road, and remedied by vegetating the rock revetment with indigenous vegetation.

(ii) that pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied;

The construction of the rock revetment did not cause pollution or degradation of the environment. The rock revetment in its current 'operational' state does not cause pollution or degradation of the environment. In contrast, the rock revetment provides stabilisation to the dune at Erf 90 and prevents the erosion and degradation of the dune from coastal waves and tidal surges.

(iii) that the disturbance of landscapes and sites that constitute the nation's cultural heritage is avoided, or where it cannot be altogether avoided, is minimised and remedied;

The house at Erf 90 is of heritage value, the rock revetment provides protection to the house at Erf 90.

(iv) that waste is avoided, or where it cannot be altogether avoided, minimised and re-used or recycled where possible and otherwise disposed of in a responsible manner;

The rock revetment does not produce waste and no waste was generated from construction. Previous poles that were used for protection at Erf 90 were sold back to the original owner when they were removed for the construction of the rock revetement.

(v) that the use and exploitation of non-renewable natural resources is responsible and equitable, and takes into account the consequences of the depletion of the resource;

The only non-renewable natural resources used during the construction of the revetment were diesel used by machinery to load rocks onto the beach Infront of Erf 90. No other non-renewable resources were used for construction.

(vi) that the development, use and exploitation of renewable resources and the ecosystems of which they are part do not exceed the level beyond which their integrity is jeopardised;

No renewable resources were exploited as part of the construction of the rock revetment.

(vii) that a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions; and

The rock revetment can be viewed as the most risk-averse and cautious approach applied to protecting the dune at Erf 90 from coastal waves and tidal surges.

(viii) that negative impacts on the environment and on people's environmental rights be anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied.

No significant negative impacts to the environment or people's environmental rights occurred along with the construction of the rock revetement.

(b) Environmental management must be integrated, acknowledging that all elements of the environment are linked and interrelated, and it must take into account the effects of decisions on all aspects of the environment and all people in the environment by pursuing the selection of the best practicable environmental option.

As indicated by the specialists, the impact significance of the rock revetment is low. The beach still functions as is, in that people can still use and access the beach and there have been no real negative impacts to the beach over the years since the construction of the rock revetment. Therefore, the rock revetment is considered to be the best practicable environmental option to protect Erf 90 from coastal waves and tidal surges.

(c) Environmental justice must be pursued so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons.

No discrimination against any person, particularly vulnerable and disadvantaged persons occurred with the construction of the rock revetment.

(d) Equitable access to environmental resources, benefits and services to meet basic human needs and ensure human well-being must be pursued and special measures may be taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination.

The beach is accessible to all and there are no negative effects on the beach associated with the rock revetment.

(e) Responsibility for the environmental health and safety consequences of a policy, programme, project, product, process, service or activity exists throughout its life cycle.

The rock revetment does not pose any consequences for environmental health and safety.

(f) The participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured.

In terms of public participation, the legislation will be complied with and all neighbours and relevant authorities will be given the opportunity to comment on the S24G process. Site notice will be placed and a press advertisement will be placed in the local newspaper. All comment will be encapsulated in a comments and response report to ensure the essence of the comments have been understood and taken into account.

(g) Decisions must take into account the interests, needs and values of all interested and affected parties, and this includes recognising all forms of knowledge, including traditional and ordinary knowledge.

In terms of public participation, the legislation will be complied with and all neighbours and relevant authorities will be given the opportunity to comment on the S24G process. Site notice will be placed and a press advertisement will be placed in the local newspaper. All comment will be encapsulated in a comments and response report to ensure the essence of the comments have been understood and taken into account.

(h) Community wellbeing and empowerment must be promoted through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means.

The beach is accessible to all and there are no negative effects on the beach associated with the rock revetment.

(i) The social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment.

This was done as part of the S24G Process.

(j) The right of workers to refuse work that is harmful to human health or the environment and to be informed of dangers must be respected and protected.

The company that did the construction work has norms and standards in terms of work employment and thus workers' rights would have been respected.

(k) Decisions must be taken in an open and transparent manner, and access to information must be provided in accordance with the law.

In terms of public participation, the legislation will be complied with and all neighbours and relevant authorities will be given the opportunity to comment on the S24G process. Site notice will be placed and a press advertisement will be placed in the local newspaper. All comment will be encapsulated in a comments and response report to ensure the essence of the comments have been understood and taken into account.

(l) There must be intergovernmental co-ordination and harmonisation of policies, legislation and actions relating to the environment.

In terms of public participation, the legislation will be complied with, and all relevant authorities will be given the opportunity to comment on the S24G process.

(m) Actual or potential conflicts of interest between organs of state should be resolved through conflict resolution procedures.

The S24G process has been delegated from DFFE to DEADP Cape Town, Oceans and Coasts will also be asked to provide comment on the S24G Application and we will then see if there are any conflicts.

(n) Global and international responsibilities relating to the environment must be discharged in the national interest.

(o) The environment is held in public trust for the people, the beneficial use of environmental resources must serve the public interest and the environment must be protected as the people's common heritage.

People can still access and use the beach, the rock revetment also has less of a visual impact compared to other protective measures such as a vertical wall.

(p) The costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects must be paid for by those responsible for harming the environment.

The S24G Application and fine will be paid for by the Pallister Trust, owners of Erf 90 who had installed the rock revetement.

(q) The vital role of women and youth in environmental management and development must be recognised and their full participation therein must be promoted.

The Public Participation Process is open to all ages races and genders, and all ages, races and genders can use the beach.

(qA) The full participation of previously disadvantaged professionals, with specific emphasis on black professionals and indigenous knowledge practitioners in the environmental management sector, must be recognised and their participation in the sector promoted.

In terms of public participation, the legislation will be complied with and all neighbours and relevant authorities will be given the opportunity to comment on the S24G process. Site notice will be placed and a press advertisement will be placed in the local newspaper. All comment will be encapsulated in a comments and response report to ensure the essence of the comments have been understood and taken into account.

(r) Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure.

Although coastal shores are generally considered sensitive and vulnerable, this is a fairly urban setting. Many people use this beach on a daily basis, and the impact of removing the revetment will have a larger on the coastal area. The rock revetment has been stable for over 20 years and according to the specialist reports, it is likely to stay that way. Therefore, the best practicable option is to leave it as is.

SECTION E: ALTERNATIVES

Please Note: Before completing this section, first consult this Department's *Guideline on Alternatives* (March 2013) available on the Department's website (**http://www.capegateway.gov.za/eadp**).

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

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

(c) the design or layout of the activity;
(d) the technology to be used in the activity;
(e) the operational aspects of the activity; and
(f) the option of not implementing the activity.

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

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

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

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

Please note:

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

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

Because the revetment was specifically constructed for the sole purpose of protection the house situated at Erf 90 from tidal waves and coastal surges, no property and location/site alternatives exist.

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

Dr. Allan Wijnberg from Consulting Port and Coastal Engineers (CPCE) was appointed to compile as specialist report relating to the feasibility of the rock revtement in protecting Erf 90 from coastal waves and tidal surges; what should have been done to protect Erf 90 from coastal waves and tidal surges; alternative measures that could have been implemented to protect Erf 90 from coastal waves and tidal surges; and a professional opinion on the best outcome/solution regarding the protection of Erf 90 from coastal waves and tidal surges. They determined the following alternative activities:

- **Construction of a new revetment within the property boundary:** The construction of a new revetment within the boundary of erf 90 would require the temporary removal of the existing foredune and its vegetation, the excavation of the toe of the slope to the previously eroded beach level (approx. 0 msl) and the construction of a new slope which would terminate about a metre from the house foundations. The upper slopes (above + 5 m msl) could be vegetated, but the lower slopes would remain a rock revetment. This option is expected to require significant capital investment and time to permit and construct. In addition, this will require the removal of the current revetment, which would constitute a great deal of disturbance to the beach area in front of Erf 90, Erf 91 and the public car park across from Leentjiesklip. New temporary access roads will need to be constructed to allow construction machinery to access the site, which would entail machinery driving on the beach and causing significant disturbance to the area around Leentjiesklip. This disturbance will have a direct impact on the surrounding community and people visiting the beach, in terms of noise and the visual aspects associated with construction in a natural environment. Removal of the rock revetment will also cost in the order of R900 000, according to a contractor.
- **Construction of a new vertical wall within the property boundary:** An alternative to the revetment would be to install a vertical sheet pile retaining wall along the boundary similar to that in the car park area. The toe of the structure would need to be located significantly deeper than the revetment options due the greater degree of back beach erosion that

would occur during a large storm. Further consideration would need to be given to the reflected wave from this wall which would focus wave energy on the car park. The benefit of this option would be the retention of the garden but at significant capital cost. In addition, this will require the removal of the current revetment (removal of the revetment alone will cost in the order of R900 000 according to a contractor), which would constitute a great deal of disturbance to the beach area in front of Erf 90, Erf 91 and the public car park across from Leentjiesklip. New temporary access roads will need to be constructed to allow construction machinery to access the site, which would entail machinery driving on the beach and causing significant disturbance to the area around Leentjiesklip. This disturbance will have a direct impact on the surrounding community and people visiting the beach, in terms of noise and the visual aspects associated with construction in a natural environment. The construction of the vertical wall will also have a far greater visual impact, compared to the vegetated rock revetment that currently exists at the site.

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

Re-establishment of dune on the existing revetment: CPCE determined that a soft engineering option would be to re-establish the foredune in front and over the top of the existing revetment. This would entail rebuilding the foredune using suitable beach sand and establishing appropriate vegetation. The revetment would maintain its protective function during storm events but would also fulfil the sand storage function of the foredune which could supply the beach during extreme event. Maintenance would be required after large storm events but the overall resilience of the beach to storm events would be improved. It is recommended that the same approach be implemented in front of the car park vertical wall.

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

Construction of a new vertical wall within the property boundary: According to Dr. Allan Wijnberg of CPCE, an alternative to the revetment would be to install a vertical sheet pile retaining wall along the boundary similar to that in the car park area. The toe of the structure would need to be located significantly deeper than the revetment options due the greater degree of back beach erosion that would occur during a large storm. Further consideration would need to be given to the reflected wave from this wall which would focus wave energy on the car park. The benefit of this option would be the retention of the garden but at significant capital cost. In addition, this will require the removal of the current revetment (removal of the revetment alone will cost in the order of R900 000 according to a contractor), which would constitute a great deal of disturbance to the beach area in front of Erf 90, Erf 91 and the public car park across from Leentjiesklip. New temporary access roads will need to be constructed to allow construction machinery to access the site, which would entail machinery driving on the beach and causing significant disturbance to the area around Leentjiesklip. This disturbance will have a direct impact on the surrounding community and people visiting the beach, in terms of noise and the visual aspects associated with construction in a natural environment. The construction of the vertical wall will also have a far greater visual impact, compared to the vegetated rock revetment that currently exists at the site.

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

No Operational alternatives exist because the rock revetment does not have an operational component/phase.

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

Removal of the revetment: CPCE determined that the removal of the revetment will expose the historical protection works, timber gabions, vertical concrete brick wall and the vegetated slope to erosion during large storm events. If unmitigated it will result in the loss of the foredune and ultimately threaten the house. In addition to the impact on erf 90, the interfaces between the car park and erf 90 will be eroded as the foredune recedes. The same will occur between erf 90 and erf 91 where erosion will extend behind the western flank of the existing revetment. The process of removing the revetment would constitute a great deal of disturbance to the beach area in front of Erf 90, Erf 91 and the public car park across from Leentjiesklip. New temporary access roads will need to be constructed to allow construction machinery to access the site, which would entail machinery driving on the beach and causing significant disturbance to the area around Leentjiesklip. This disturbance will have a direct impact on the surrounding community and people visiting the beach, in terms of noise and the visual aspects associated with construction in a natural environment. There will also be significant traffic implications for tourists trying to get to the car park, and residents who live along Sands Road. Removal of the revetment will also cost in the order of R900 000, according to a contractor.

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

Do nothing: CPCE determined that the revetment has been in place for more than 20 years, the structure is in good condition and is functional as protection for the vegetated foredune which in turn secures the house against extreme storm events. The beach has not been detrimentally affected by its presence in the back beach area in spite of the foredune material not being readily available. It is within this context that consideration could be given maintaining the status quo.

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

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

Dr. Allan Wijnberg from Consulting Port and Coastal Engineers (CPCE) was appointed to compile as specialist report relating to the feasibility of the rock revtement in protecting Erf 90 from coastal waves and tidal surges; what should have been done to protect Erf 90 from coastal waves and tidal surges; alternative measures that could have been implemented to protect Erf 90 from coastal waves and tidal surges; and a professional opinion on the best outcome/solution regarding the protection of Erf 90 from coastal waves and tidal surges. They determined the following alternative activities:

- **Removal of the revetment:** CPCE determined that the removal of the revetment will expose the historical protection works, timber gabions, vertical concrete brick wall and the vegetated slope to erosion during large storm events. If unmitigated it will result in the loss of the foredune and ultimately threaten the house. In addition to the impact on erf 90, the interfaces between the car park and erf 90 will be eroded as the foredune recedes. The same will occur between erf 90 and erf 91 where erosion will extend behind the western flank of the existing revetment. The process of removing the revetment would constitute a great deal of disturbance to the beach area in front of Erf 90, Erf 91 and the public car park across from Leentjiesklip. New temporary access roads will need to be constructed to allow construction machinery to access the site, which would entail machinery driving on the beach and causing significant disturbance to the area around Leentjiesklip. This disturbance will have a direct impact on the surrounding community and people visiting the beach, in terms of noise and the visual aspects associated with construction in a natural environment. There will also be significant traffic implications for tourists trying to get to the car park, and residents who live along Sands Road. Removal of the rock revetment will also cost in the order of R900 000, according to a contractor.
- **Construction of a new revetment within the property boundary:** The construction of a new revetment within the boundary of erf 90 would require the temporary removal of the existing foredune and its vegetation, the excavation of the toe of the slope to the previously eroded beach level (approx. 0 msl) and the construction of a new slope which would terminate about a metre from the house foundations. The upper slopes (above + 5 m msl) could be vegetated, but the lower slopes would remain a rock revetment. This option is expected to require significant capital investment and time to permit and construct. In addition, this will require the removal of the current revetment, which would constitute a great deal of disturbance to the beach area in front Erf 90, Erf 91 and the public car park across from

Leentjiesklip. New temporary access roads will need to be constructed to allow construction machinery to access the site, which would entail machinery driving on the beach and causing significant disturbance to the area around Leentjiesklip. This disturbance will have a direct impact on the surrounding community and people visiting the beach, in terms of noise and the visual aspects associated with construction in a natural environment. There will also be significant traffic implications for tourists trying to get to the car park, and residents who live along Sands Road. Removal of the rock revetment will also cost in the order of R900 000, according to a contractor.

- **Construction of a new vertical wall within the property boundary:** An alternative to the revetment would be to install a vertical sheet pile retaining wall along the boundary similar to that in the car park area. The toe of the structure would need to be located significantly deeper than the revetment options due the greater degree of back beach erosion that would occur during a large storm. Further consideration would need to be given to the reflected wave from this wall which would focus wave energy on the car park. The benefit of this option would be the retention of the garden but at significant capital cost. In addition, this will require the removal of the current revetment (Removal of the rock revetment will also cost in the order of R900 000 according to a contractor), which would constitute a great deal of disturbance to the beach area in front of Erf 90, Erf 91 and the public car park across from Leentjiesklip. New temporary access roads will need to be constructed to allow construction machinery to access the site, which would entail machinery driving on the beach and causing significant disturbance to the area around Leentjiesklip. This disturbance will have a direct impact on the surrounding community and people visiting the beach, in terms of noise and the visual aspects associated with construction in a natural environment. The construction of the vertical wall will also have a far greater visual impact, compared to the vegetated rock revetment that currently exists at the site.
- **Re-establishment of dune on the existing revetment:** CPCE determined that a soft engineering option would be to re-establish the foredune in front and over the top of the existing revetment. This would entail rebuilding the foredune using suitable beach sand and establishing appropriate vegetation. The revetment would maintain its protective function during storm events but would also fulfil the sand storage function of the foredune which could supply the beach during extreme event. Maintenance would be required after large storm events but the overall resilience of the beach to storm events would be improved. It is recommended that the same approach be implemented in front of the car park vertical wall.
- **Do nothing:** CPCE determined that the revetment has been in place for more than 20 years, the structure is in good condition and is functional as protection for the vegetated foredune which in turn secures the house against extreme storm events. The beach has not been detrimentally affected by its presence in the back beach area in spite of the foredune material not being readily available. It is within this context that consideration could be given maintaining the status quo.

Table 4: Summary of the option assessment

Options	Cost	General assessment
Removal	Low cost	Increased risk to vegetated slope, existing house and adjacent properties
New revetment at boundary	High cost	Loss of erf 90 garden and visual impact on lower slope revetment
Vertical wall at boundary	Very high cost	Visual impact, increased back beach erosion and wave focussing on car park
Rebuild foredunes	Low cost	Enhancement of beach stability and reduction of visual impact
Do nothing	No cost	Visual impact of revetment and maintenance of the status quo

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

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

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

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

(a) Geographical and physical aspects:

Since the houses construction at Erf 90 in 1933, the property has been subjected to episodic erosion events due to a combination of high wave and seal level conditions. Protection measures to prevent erosion and to protect Erf 90 from coastal waves and tidal surges has commenced since 1933 when the house was built, the installation of the rock revetment entailed the removal of the previous protection measures and no other physical or geographical aspects of the site were altered. When considering any sandy beach dune stabilization system, it is important to evaluate its potential impact on the overall beach stability. CPCE determined that whilst the revetment is designed to protect the toe of the foredune under extreme storm conditions it should not prevent the build-up of sand on the middle and back beach areas and should allow for the natural vegetation to re-establish itself post the event. Both these conditions appear to have been met by the structure. Apart from protecting Erf 90, this revetment forms a hard point (similar Leentjiesklip) which protects the car park seawall and adjacent properties to the east, without any detrimental effects of the overall beach system.

(b) Biological aspects:

Has the development impacted on critical biodiversity areas (CBAs) or ecological support areas (ESAs)?	**YES**	NO
If yes, please describe:		
According to the Terrestrial Biodiversity Assessment: a small western section of Erf 90 and the rock revetment intersect with an area mapped as a degraded ESA2, defined as "Areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of PAs or CBAs, and are often vital for delivering ecosystem services". This degraded ESA2 is mapped as a buffer zone around a small non-perennial drainage channel located to the west, serving to maintain the natural flow of this non-perennial stream. Currently, the entire area to the west of Erf 90 contains the parking lots and ablution of the Wilderness Beach Front from where the public may access the beach. This area is separated from the beach by a municipal concrete revetment wall with a small pipe from where water drains over the beach into the ocean. Importantly therefore, this part of the drainage channel has been irreversibly modified to flow beneath the Wilderness Beach Front parking area prior to installation of the rock revetment. Given this modification of the drainage channel therefore, this part, including Erf 90 and the rock revetment, fails to meet the criteria of an ESA2. To this end, the presence of the rock revetment on Erf 90 does not have any impact on this freshwater drainage channel or the buffer surrounding it, and therefore has no impact on this terrestrial biodiversity feature. **It is important to note that at the time of the Terrestrial Biodiversity Assessment the Western Cape Biodiversity Spatial Plan (WCBSP) of 2017 was still applicable. With regards to the WCSBP 2023, the area mentioned above is not mapped as ESA2 and is no longer applicable.**		
Has the development impacted on terrestrial vegetation, or aquatic ecosystems (wetlands, estuaries or the coastline)?	YES	**NO**
If yes, please describe:		

Has the development impacted on any populations of threatened plant or animal species, and/or on any habitat that may contain a unique signature of plant or animal species?	YES	**NO**

If yes, please describe:

Please describe the manner in which any other biological aspects were impacted:

The small terrace north of the rock revetment harbours a dense incidence of Tickberry (Osteospermum moniliferum) and Dune Spinach (Tetragonia decumbens) with single incidences of the Cape Aloe (Aloe ferox) and Krantz Aloe (Aloe arborescens) also noted. These botanical elements are in line with the mapped vegetation type of Cape Seashore Vegetation (VEGMAP 2024 Beta) which is currently classified as a "Least-Threatened" ecosystem type (Subsection 2.2), and has a large Remaining Ecosystem Extent (REE) of 98%. To this end, the area of the rock revetment harbours the natural vegetation representative of the broader landscape and does not contain any non-native or invasive botanical elements.

Only three faunal species (the Kelp Gull, Cape Wagtail and Green-eyed Vagrant) were recorded in vicinity of the rock revetment (Figure 8), all of which are currently classified as "Least Concern" by the IUCN. Given the placement of the revetment in an urban environment next to busy roads, the Wilderness Beach Front and the beach area, faunal diversity appears highly impaired with only single species present. To this end, Erf 90 does not intersect with any notable faunal features or -habitats and is of a very low sensitivity from a faunal perspective.

From botanical and faunal perspectives, both Erf 90 and the southern rock revetment intersect areas of very low sensitivity with a natural vegetation profile of "Least Concern" and very low faunal diversity and abundances.

Taken together, the impact of this rock revetment on the receiving environment would have been minimal and has led to minimal or no loss or degradation of ecological processes or biodiversity patterns in either local or regional context. To this end, ecosystem function has not been impacted by the installation of this feature with its impact being of No significance to the receiving environment.

(c) Socio-Economic aspects:

What was the capital value of the activity on completion?	R135 000	
What is the (expected) yearly income or contribution to the economy that is/will be generated by or as a result of the activity?	Turnover year ending 28/02/2025 - R715 365	
Has/will the activity have contributed to service infrastructure?	YES	**NO**
How many new employment opportunities were/will be created in the construction phase of the activity?	8	
What was the value of the employment opportunities during the construction phase?	R 120 000	
What percentage of this accrued to previously disadvantaged individuals?	50 %	

How was this ensured and monitored (please explain):

Not Applicable.

How many permanent new employment opportunities were/will be created during the operational phase of the activity?	6
What is the current/expected value of the employment opportunities during the first 10 years?	R 196 014 per annum Multiplied by 10 years = R1 960 140
What percentage of this accrued/will accrue to previously disadvantaged individuals?	100%

How was/will this be ensured and monitored (please explain):
Not Applicable.
Any other information related to the manner in which the socio-economic aspects was/will be impacted:
Not Applicable.

(d) Cultural and historic aspects:

Not Applicable.

2. WASTE AND EMISSIONS

(a) Waste (including effluent) management

Did the activity produce waste (including rubble) during the construction phase?	YES	**NO**
If yes, indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type?		m^3
The previous erosion measures (logs) were recovered and resold to the company from which the owner had originally bought them from.		

Does the activity produce waste during its operational phase?	YES	**NO**
If yes, indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type?		m^3

Where and how was/will the waste be treated / disposed of (describe)?	
Not Applicable.	
Has the municipality or relevant authority confirmed that sufficient capacity exists for treating / disposing of the waste (to be) generated by this activity(ies)? If yes, provide written confirmation from Municipality or relevant authority	**N/A**
Does/will the activity produce waste that is/will be treated and/or disposed of at another facility other than into a municipal waste stream?	**N/A**
If yes, has this facility confirmed that sufficient capacity exists for treating / disposing of the waste (to be) generated by this activity(ies)? Provide written confirmation from the facility and provide the following particulars of the facility:	**N/A**
Does the facility have an operating license? (If yes, please attach a copy of the license.)	**N/A**
Facility name:	
Contact person:	
Postal address:	
	Postal code:
Telephone:	Cell:
E-mail:	Fax:

Describe the measures that were/will be taken to reduce, reuse or recycle waste:
Not Applicable.

(b) Emissions into the atmosphere

Does/will the activity produce emissions that will be disposed of into the atmosphere?	YES	**NO**

If yes, does it require approval in terms of relevant legislation?	YES	NO
Describe the emissions in terms of type and concentration and how it is/will be treated/mitigated:		

3. WATER USE

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

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

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

Please provide proof of assurance of water supply (e.g. Letter of confirmation from municipality / water user associations, yield of borehole)		
Did/does the activity require a water use permit / license from DWA?	YES	**NO**
If yes, please submit a certified copy of the water use permit/license or submit the necessary application to Department of Water Affairs and attach proof thereof to this application, whichever is applicable.		
Describe the measures that were/ will be taken to reduce water demand, and measures to reuse or recycle water:		

4. POWER SUPPLY

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

Not Applicable - The revetment does not use power.

If power supply is not available, where will power be sourced from?
Not Applicable.

5. ENERGY EFFICIENCY

Describe the design measures, if any, that have been taken to ensure that the activity is energy efficient:
Not Applicable.

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

Not Applicable.

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

Please note:

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

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

~~Impacts on geographical and physical aspects:~~	
~~Nature of impact:~~	
~~Extent and duration of impact:~~	
~~Probability of occurrence:~~	
~~Degree to which the impact can be reversed:~~	
~~Degree to which the impact may cause irreplaceable loss of resources:~~	
~~Cumulative impact prior to mitigation:~~	

~~Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)~~	
~~Degree to which the impact can be mitigated:~~	
~~Proposed mitigation:~~	
~~Cumulative impact post mitigation:~~	
~~Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)~~	

Impact on biological aspects: Terrestrial Biodiversity	
Nature of impact:	**Negative**
Extent and duration of impact:	**Site specific; Long term**
Probability of occurrence:	**Improbable**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resource**
Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**No significance**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**No significance**

Impact on biological aspects: Vegetation	
Nature of impact:	**Negative**
Extent and duration of impact:	**Site specific; Long term**
Probability of occurrence:	**Improbable**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resource**
Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**No significance**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**No significance**

Impact on biological aspects: Faunal and Avifaunal Species	
Nature of impact:	**Negative**
Extent and duration of impact:	**Site specific; Long term**
Probability of occurrence:	**Improbable**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resource**

Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**No significance**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**No significance**

Impacts on socio-economic aspects: Temporary Job Opportunities	
Nature of impact:	**Positive**
Extent and duration of impact:	**Local; Temporary**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**N/A**
Cumulative impact prior to mitigation:	**Low** • **Sustainable livelihoods for employees and their dependants** • **Reduction in local and national unemployment rates** • **Increased income tax revenue for the government**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**

Impacts on socio-economic aspects: Tourism	
Nature of impact:	**Positive**
Extent and duration of impact:	**Local; Long term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**N/A**
Cumulative impact prior to mitigation:	**Low:** • **Protection of public car park and sea wall** • **Protection of guest house**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be mitigated:	**N/A**

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

Impacts on cultural-historical aspects: Heritage Value of House at Erf 90	
Nature of impact:	**Positive**
Extent and duration of impact:	**Local, Long term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**N/A**
Cumulative impact prior to mitigation:	**Medium:** • **Protection of the house at Erf 90 which is of heritage value.**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Medium Low**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**Medium**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**Medium Low**

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

Visual impacts / Sense of Place: Bare Rock Until Vegetation Established	
Nature of impact:	**Negative**
Extent and duration of impact:	**Local; Temporary**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resource**
Cumulative impact prior to mitigation:	**N/A**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low:** • **Bare rocks were covered with sand and the revetment was vegetated by the applicant.**
Degree to which the impact can be	**N/A**

mitigated:	
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**

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

Impacts on the geographical and physical aspects: Stabilisation of the Dune	
Nature of impact:	**Positive**
Extent and duration of impact:	**Local; Long term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resource**
Cumulative impact prior to mitigation:	**N/A**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low:** • **The revetment has caused stabilisation of the dune upon which the house at Erf 90 is built.** • **The revetment has prevented erosion of the dune upon which the house at Erf 90 is built.**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**

Impact on biological aspects: Establishment of Indigenous Vegetation on Revetment	
Nature of impact:	**Positive**
Extent and duration of impact:	**Local; Long term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**N/A**
Cumulative impact prior to mitigation:	**N/A**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low:** • **Indigenous Cape Seashore Vegetation has established on the revetment.**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**

Impacts on the socio-economic aspects: Tourism	
Nature of impact:	**Positive**
Extent and duration of impact:	**Local; Long term**

Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**N/A**
Cumulative impact prior to mitigation:	**Low:** • **Protection of public car park and sea wall** • **Protection of guest house**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**

Impacts on the cultural-historical aspects: Heritage Value of House Conserved	
Nature of impact:	**Positive**
Extent and duration of impact:	**Local, Long term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**N/A**
Cumulative impact prior to mitigation:	**Medium:** • **Protection of the house at Erf 90 which is of heritage value.**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Medium Low**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**Medium**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**Medium Low**

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

Visual impacts / Sense of Place: Revetment Prevents Heritage House Being Undermined and Potentially Damaged

Nature of impact:	**Positive**
Extent and duration of impact:	**Local, Long term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**N/A**
Cumulative impact prior to mitigation:	**Low:** • **Protection of the house at Erf 90 which is of heritage value.** • **House would have been undermined and potentially damaged, would the revetment not have been in place.**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**

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

Potential impacts on the geographical and physical aspects: Removal of Revetment Will Result in Erosion of Dune	
Nature of impact:	**Negative**
Extent and duration of impact:	**Local, Long term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**Erosion and loss of house at Erf 90, Erosion of Erf 91 and car park sea wall**
Cumulative impact prior to mitigation:	**Medium:** • **Erosion of the dune at Erf 90 will result in damage and potential damage to the house at Erf 90.** • **Erosion of dune will also result in subsequent erosion of Erf 91.** • **Erosion of dune will also result in more frequent high energy waves at the car park seawall.**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Medium**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**N/A**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**Medium**

Potential impact on biological aspects: Removal of Revetment Will Result in Loss of Indigenous

Vegetation	
Nature of impact:	**Negative**
Extent and duration of impact:	**Local; Short term**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**Loss of Indigenous Vegetation**
Cumulative impact prior to mitigation:	**Low:** • **Removal of the revetment will result in the removal of approximately 380m² of indigenous Cape Seashore vegetation.**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**N/A**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**

Potential impacts on the socio-economic aspects: Removal of the Revetment Results in Undermining and Damage of Tourism Guest House	
Nature of impact:	**Negative**
Extent and duration of impact:	**Regional; Permanent**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**Ruin of tourism house**
Cumulative impact prior to mitigation:	**Low:** • **Removal of the revetment will result in the undermining and potential damage of the tourism guest house at Erf 90 due to tidal surges and coastal waves.**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**N/A**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**

Potential impacts on the cultural-historical aspects: Removal of Revetment Will Result in Undermining and Damage of Heritage House	
Nature of impact:	**Negative**
Extent and duration of impact:	**Regional; Permanent**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause	**Ruin of heritage house**

irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	**Medium:** • **Removal of the revetment will result in the undermining and potential damage of the heritage house at Erf 90 due to tidal surges and coastal waves.**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Medium**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**N/A**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	**Medium**

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

Potential visual impacts: Removal of Revetment Will Result in Erosion and Undermining and Damage of House and Property at Erf 90	
Nature of impact:	**Negative**
Extent and duration of impact:	**Local; Permanent**
Probability of occurrence:	**Definite**
Degree to which the impact can be reversed:	**N/A**
Degree to which the impact may cause irreplaceable loss of resources:	**Loss of Indigenous Vegetation**
Cumulative impact prior to mitigation:	**Low:** • **Removal of the revetment will result in the undermining and damage of the house and property at Erf 90, which will have a visual impact for the surrounding area and community.**
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation:	**N/A**
Cumulative impact post mitigation:	**N/A**
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-	**Low**

High)	

~~(d) Any other impacts:~~

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

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

7. SPECIALIST INPUTS/STUDIES AND RECOMMENDATIONS

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

Specialist inputs/studies and recommendations:

Terrestrial Biodiversity Assessment:

Dr. J. H. Visser from Blue Skies Research was appointed to compile the Terrestrial Biodiversity Assessment. The assessment found:

Vegetation:

the study area encompasses the buildings and garden on Erf 90, with the rock revetment located over the southern edge and constructed with natural materials (rocks) similar to that found in the surrounding landscape. The small terrace north of the rock revetment harbours a dense incidence of Tickberry (*Osteospermum moniliferum*) and Dune Spinach (*Tetragonia decumbens*) with single incidences of the Cape Aloe *(Aloe ferox*) and Krantz Aloe (*Aloe arborescens*) also noted. These botanical elements are in line with the mapped vegetation type of Cape Seashore Vegetation (VEGMAP 2024 Beta) which is currently classified as a "Least-Threatened" ecosystem type (Subsection 2.2), and has a large Remaining Ecosystem Extent (REE) of 98%. To this end, the area of the rock revetment harbours the natural vegetation representative of the broader landscape and does not contain any non-native or invasive botanical elements.

Faunal and avifaunal composition:

Only three faunal species (the Kelp Gull, Cape Wagtail and Green-eyed Vagrant) were recorded in vicinity of the rock revetment, all of which are currently classified as "Least Concern" by the IUCN. Given the placement of the revetment in an urban environment next to busy roads, the Wilderness Beach Front and the beach area, faunal diversity appears highly impaired with only single species present. To this end, Erf 90 does not intersect with any notable faunal features or -habitats and is of a very low sensitivity from a faunal perspective.

Terrestrial biodiversity:

From botanical and faunal perspectives, both Erf 90 and the southern rock revetment intersect areas of very low sensitivity with a natural vegetation profile of "Least Concern" and very low faunal diversity and abundances. According the Western Cape Spatial Biodiversity Plan only small western sections of Erf 90 and the rock revetment intersect with an area mapped as a degraded ESA2, defined as "Areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of PAs or CBAs, and are often vital for delivering ecosystem services". This degraded ESA2 is mapped as a buffer zone around a small non-perennial drainage channel located to the west, serving to maintain the natural flow of this non-perennial stream.

Currently, the entire area to the west of Erf 90 contains the parking lots and ablution of the Wilderness Beach Front from where the public may access the beach. This area is separated from the beach by a municipal concrete revetment wall with a small pipe from where water drains over the beach into the ocean. Importantly therefore, this part of the drainage channel has been irreversibly modified to flow beneath the Wilderness Beach Front parking area prior to installation of the rock revetment. Given this modification of the drainage channel therefore, this part, including Erf 90 and the rock revetment, fails to meet the criteria of an ESA2. To this end, the presence of the rock revetment on Erf 90 does not have any impact on this freshwater drainage channel or the buffer surrounding it, and therefore has no impact on this terrestrial biodiversity feature.

Impacts:
Installation of the rock revetment would have been unlikely to impact on terrestrial biodiversity features in the landscape for several reasons:

- The overall footprint of the rock revetment is very small (~380m2);
- The revetment is constructed of natural materials (rocks) which appears to originate from the surrounding area;
- Soils used to in-fill the revetment is characteristic of the surrounding area and harbours natural vegetation elements similar to that found in the surrounding landscape;
- The revetment is located at the edge of the residential area towards the beach front which harbours very few faunal elements and therefore a highly impaired faunal diversity;
- The revetment does not impact on the degraded ESA2 as it does not interfere with the non-perennial drainage line to the west which traverses the Wilderness Beach Front concrete revetment wall through a small pipe.

Taken together therefore, the impact of this rock revetment on the receiving environment would have been minimal and has led to minimal or no loss or degradation of ecological processes or biodiversity patterns in either local or regional contexts.

Coastal Engineering Protection Assessment:
Coastal Engineering Protection Assessment was undertaken by Dr. A. Wijnberg from Consulting Port and Coastal Engineers.

Coastal process:
The coastal morphology associated with the site under consideration is defined by the natural processes affecting the greater coastal zone from the Kaaimans river estuary to several kilometres of beach to the east. Developments on the foredune system over the last 80 years has reduced the amount of sand in storage which in turn has resulted in a more vulnerable shoreline to large episodic storm events. Under normal conditions it remains in a dynamic equilibrium between sand availability, wave energy distribution and prevailing sea levels. An analysis of the coastal erosion since the year 2000 (DE Africa (2023)) shows no net erosion. An assessment of coastline vulnerability undertaken by CSIR (2023) indicates a high risk of erosion to the east of the site. This is associated with the low lying car park, stormwater outfalls and the presence of a vertical seawall.

Future climate change:
It is expected that global climate will affect the conditions prevailing at the site over the next 100 years. This is likely to affect the beach and dune system in the following manner:

- By 2100 extreme wave conditions are expected to increase by some 5% with a southward rotation of the south westerly swell of approximately 5%.
- The extent of sea level rise is dependent on the future emission reductions achieved globally. If a midlevel scenario (upper confidence level) is selected for 2060 an increase in sea level of 0.4 m is forecast whilst for 2100 an increase of 0.8 m is forecast. (see figure 30 below). Increased sea levels in future will result in more erosion of the beach dune system.

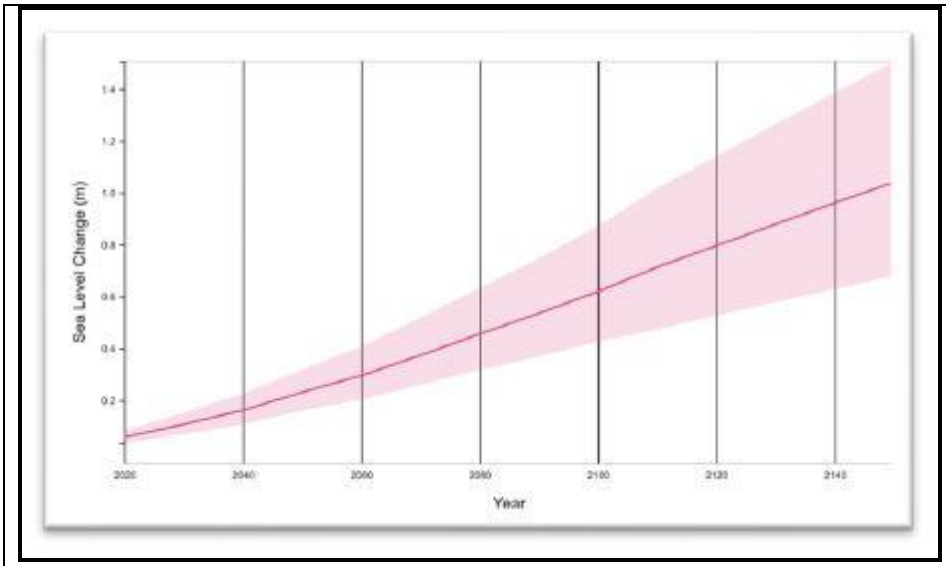

Figure 30: Projected sea level rise for SSP2-4.5 scenario.

The impact of climate change is expected therefore to lead to more severe conditions at the site. This will be experienced as greater levels erosion of the dune system during large scale storm events. The entire system however will tend towards an equilibrium and post storm recovery.

Condition of the revetment:
An inspection of the revetment on site in January 2025 shows the revetment revealed, after the largest recorded storm event to date, in September 2023. An assessment, based on what is visible on the surface, indicates that good quality rock has been used for the construction and that the revetment is largely intact. Generally, the rock size appears to be larger than the 0.4–0.7 t rock indicated on the drawing. Our estimate would be closer to 0.5 t–2.0 t, on average. Although it was not possible to see the geotextile layer, we have no reason to believe that this is not still intact. A year after the last major storm event the beach has largely recovered on the bottom and mid sections. Our overall assessment is that the revetment is in good condition and will continue to function as an effective protective barrier during the next storm event.

Impact of revetment on surrounding beach stability:
When considering any sandy beach dune stabilization system, it is important to evaluate its potential impact on the overall beach stability. Whilst the revetment is designed to protect the toe of the foredune under extreme storm conditions it should not prevent the build-up of sand on the middle and back beach areas and should allow for the natural vegetation to re-establish itself post the event. Both these conditions appear to have been met by the structure. Apart from protecting Erf 90, this revetment forms a hard point (similar Leentjiesklip) which protects the car park seawall and adjacent properties to the east, without any detrimental effects of the overall beach system.

Alternative options:

- Removal of revetment: CPCE determined that the removal of the revetment will expose the historical protection works, timber gabions, vertical concrete brick wall and the vegetated slope to erosion during large storm events. If unmitigated it will result in the loss of the foredune and ultimately threaten the house. In addition to the impact on erf 90, the interfaces between the car park and erf 90 will be eroded as the foredune recedes. The same will occur between erf 90 and erf 91 where erosion will extend behind the western flank of the existing revetment.
- Construction of a new revetment within the property boundary: The construction of a new revetment within the boundary of erf 90 would require the temporary removal of the existing foredune and its vegetation, the excavation of the toe of the slope to the previously eroded beach level (approx. 0 msl) and the construction of a new slope which would terminate about a metre from the house foundations. The upper slopes (above + 5 m msl) could be vegetated, but the lower slopes would remain a rock revetment. This option is expected to require significant capital investment and time to permit and construct.
- Construction of a new vertical wall within the property boundary: An alternative to the revetment would be to install a vertical sheet pile retaining wall along the boundary similar to that in the car park area. The toe of the structure would need to be located significantly

deeper than the revetment options due the greater degree of back beach erosion that would occur during a large storm. Further consideration would need to be given to the reflected wave from this wall which would focus wave energy on the car park. The benefit of this option would be the retention of the garden but at significant capital cost.

- Re-establishment of dune on the existing revetment: CPCE determined that a soft engineering option would be to re-establish the foredune in front and over the top of the existing revetment. This would entail rebuilding the foredune using suitable beach sand and establishing appropriate vegetation. The revetment would maintain its protective function during storm events but would also fulfil the sand storage function of the foredune which could supply the beach during extreme event. Maintenance would be required after large storm events but the overall resilience of the beach to storm events would be improved. It is recommended that the same approach be implemented in front of the car park vertical wall.
- Do nothing: CPCE determined that The revetment has been in place for more than 20 years, the structure is in good condition and is functional as protection for the vegetated foredune which in turn secures the house against extreme storm events. The beach has not been detrimentally affected by its presence in the back beach area in spite of the foredune material not being readily available. It is within this context that consideration could be given maintaining the status quo.

Table 5: Summary of the option assessment

Options	Cost	General assessment
Removal	Low cost	Increased risk to vegetated slope, existing house and adjacent properties
New revetment at boundary	High cost	Loss of erf 90 garden and visual impact on lower slope revetment
Vertical wall at boundary	Very high cost	Visual impact, increased back beach erosion and wave focussing on car park
Rebuild foredunes	Low cost	Enhancement of beach stability and reduction of visual impact
Do nothing	No cost	Visual impact of revetment and maintenance of the status quo

Findings:

- The existing structure is well constructed, remains functional and capable of withstanding extreme storm events.
- The revetment is not causing any detrimental impact on the surrounding beach area apart from the visual exposure of the armour rock.
- The structure protects the existing dune vegetation, the house on erf 90, the adjacent property on erf 91and the car park seawall.

Recommendations:

- It is recommended that the structure be retained as it represents a net positive benefit to erven 90 and 91 and the public car park without causing any detrimental impact on the beach.
- In the light of projected climate change effects on the overall beach area in future, it is recommended that the structure be covered with sand and revegetated with dune building plantings with a view to improving the resilience of the beach to large storm events. This action should, if possible, be extended to the car park seawall as well.

8. IMPACT ASSESSMENT SUMMARY

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

Impacts	Significance rating of impacts after mitigation (Low, Medium, Medium-High, High, Very High):
CONSTRUCTION PHASE	
Terrestrial Biodiversity	**Very Low (-)**
Vegetation	**Very Low (-)**
Faunal and Avifaunal	**Very Low (-)**
Temporary Job Opportunities	**Medium (+)**
Tourism	**Low (+)**
Heritage Value of House at Erf 90	**Medium (+)**
Bare Rock Until Vegetation Established	**Low (-)**
OPERATIONAL PHASE	
Stabilisation of Dune	**Low (+)**
Establishment of Indigenous Vegetation on Revetment	**Low (+)**
Tourism	**Low (+)**
Heritage Value of House Conserved	**Medium (+)**
Revetement Prevents Heritage House Being Undermined and Potentially Damaged	**Low (+)**
DECOMMISSIONING / CLOSURE PHASE	
Removal of Revetment Will Result in Erosion of Dune	**Medium (-)**
Removal of Revetment Will Result in Loss of Indigenous Vegetation	**Low (-)**
Removal of Revetment Will Result in Undermining and Damage of Tourism Guest House	**Low (-)**
Removal of Revetment Will Result in Undermining and Damage of Heritage House	**Medium (-)**
Removal of Revetment Will Result in Erosion and Undermining and Damage of House and Property at Erf 90	**Low (-)**

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

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

Summary:
It is evident from the specialist reports that the negative impacts associated with the construction phase of the commenced activities are considered to be of no significance. The operational phase of the revetment provides significant positive impacts and the decommissioning / closure phase will result in significant negative impacts.

CONSTRUCTION PHASE:

Terrestrial Biodiversity
From botanical and faunal perspectives, both Erf 90 and the southern rock revetment intersect areas of very low sensitivity with a natural vegetation profile of "Least Concern" and very low faunal diversity and abundances. According the Western Cape Spatial Biodiversity Plan only small western sections of Erf 90 and the rock revetment intersect with an area mapped as a degraded ESA2, defined as "Areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of PAs or CBAs, and are often vital for delivering ecosystem services". This degraded ESA2 is mapped as a buffer zone around a small non-perennial drainage channel located to the west, serving to maintain the natural flow of this non-perennial stream. Currently, the entire area to the west of Erf 90 contains the parking lots and ablution of the Wilderness Beach Front from where the public may access the beach. This area is separated from the beach by a municipal concrete revetment wall with a small pipe from where water drains over the beach into the ocean. Importantly therefore, this part of the drainage channel has been irreversibly modified to

flow beneath the Wilderness Beach Front parking area prior to installation of the rock revetment. Given this modification of the drainage channel therefore, this part, including Erf 90 and the rock revetment, fails to meet the criteria of an ESA2. To this end, the presence of the rock revetment on Erf 90 does not have any impact on this freshwater drainage channel or the buffer surrounding it, and therefore has no impact on this terrestrial biodiversity feature.
Impact significance without mitigation: Very Low (-)
Impact significance with mitigation: Very Low (-)

Vegetation
the study area encompasses the buildings and garden on Erf 90, with the rock revetment located over the southern edge and constructed with natural materials (rocks) similar to that found in the surrounding landscape. The small terrace north of the rock revetment harbours a dense incidence of Tickberry (Osteospermum moniliferum) and Dune Spinach (Tetragonia decumbens) with single incidences of the Cape Aloe (Aloe ferox) and Krantz Aloe (Aloe arborescens) also noted. These botanical elements are in line with the mapped vegetation type of Cape Seashore Vegetation (VEGMAP 2024 Beta) which is currently classified as a "Least-Threatened" ecosystem type (Subsection 2.2), and has a large Remaining Ecosystem Extent (REE) of 98%. To this end, the area of the rock revetment harbours the natural vegetation representative of the broader landscape and does not contain any non-native or invasive botanical elements.
Impact significance without mitigation: Very Low (-)
Impact significance with mitigation: Very Low (-)

Faunal and Avifaunal
Only three faunal species (the Kelp Gull, Cape Wagtail and Green-eyed Vagrant) were recorded in vicinity of the rock revetment, all of which are currently classified as "Least Concern" by the IUCN. Given the placement of the revetment in an urban environment next to busy roads, the Wilderness Beach Front and the beach area, faunal diversity appears highly impaired with only single species present. To this end, Erf 90 does not intersect with any notable faunal features or -habitats and is of a very low sensitivity from a faunal perspective.
Impact significance without mitigation: Very Low (-)
Impact significance with mitigation: Very Low (-)

Temporary Job Opportunities
Construction of the rock revetment was done by a local contractor (Henra) which created temporary job opportunities for labourers who assisted with the construction process.
Impact significance without mitigation: Medium (+)
Impact significance with mitigation: Medium (+)

Tourism
The revetment provides protection for the house at Erf 90, which is a guest house and provides accommodation for people visiting the area which contributes to tourism in Wilderness. The revetment also provides protection to the car park sea wall which is where tourists can access the beach and view Leentjiesklip, a popular tourist attraction.
Impact significance without mitigation: Low (+)
Impact significance with mitigation: Low (+)

Heritage Value of House at Erf 90
Construction of the revetment provided protection to the house situated at Erf 90, which is of heritage value.
Impact significance without mitigation: Low (+)
Impact significance with mitigation: Low (+)

Bare Rock Until Vegetation Established
After the revetment was constructed, the rock boulders were bare and covered with a layer of sand, this could have had a visual impact based on certain perceptions. However, this was temporary because the rock revetment was eventually completely covered with indigenous vegetation.
Impact significance without mitigation: Low (-)
Impact significance with mitigation: Low (-)

OPERATIONAL PHASE:

Stabilisation of Dune
The rock revetment had stabilised the dune at Erf 90 which was susceptible to erosion from tidal surges and coastal waves.
Impact significance without mitigation: Low (+)
Impact significance with mitigation: Low (+)

Establishment of Indigenous Vegetation
The rock revetment was covered with sand and vegetated, allowing for the establishment of approximately 380m^2 of indigenous Cape Seashore vegetation.
Impact significance without mitigation: Low (+)
Impact significance with mitigation: Low (+)

Tourism
The revetment provides protection for the house at Erf 90, which is a guest house and provides accommodation for people visiting the area which contributes to tourism in Wilderness. The revetment also provides protection to the car park sea wall which is where tourists can access the beach and view Leentjiesklip, a popular tourist attraction.
Impact significance without mitigation: Low (+)
Impact significance with mitigation: Low (+)

Heritage Value of House Conserved
The revetment provides protection to the house at Erf 90, therefore contributing to the conservation to the houses heritage value (House was built in 1933 and is therefore older than 60 years and of heritage value).
Impact significance without mitigation: Medium (+)
Impact significance with mitigation: Medium (+)

Revetment Prevents Heritage House Being Undermined and Potentially Damaged
The revetment provides protection to the house at Erf 90, without the revetment the house would be exposed to erosion from tidal surges and coastal waves which would have undermined the house and potentially caused significant damage. This would create an eyesore and have a visual impact on people visiting the beach, Leentjiesklip and the surrounding neighbours.
Impact significance without mitigation: Low (+)
Impact significance with mitigation: Low (+)

DECOMMISSIONING / CLOSURE PHASE:

Removal of Revetment Will Result in Erosion of Dune
Removing the revetment will cause subsequent erosion of the dune at Erf 90, which will cause damage and potential loss to the house at Erf 90, subsequent erosion at Erf 91 and more frequent high energy waves at the car park seawall.
Impact significance without mitigation: Medium (-)
Impact significance with mitigation: Medium (-)

Removal of Revetment Will Result in Loss of Indigenous Vegetation
Removing the revetment will result in the subsequent removal and loss of approximately 380m^2 of indigenous Cape Seashore vegetation, which has established on the revetment.
Impact significance without mitigation: Low (-)
Impact significance with mitigation: Low (-)

Removal of Revetment Will Result in the Undermining and Damage of the Tourism Guest House
The rock revetment provides protection for the guest house at Erf 90, which is of tourism value to the area. Removal of the revetment will remove the protective measures that protect the house from tidal surges and coastal waves, resulting in subsequent Undermining and damage / ruin to the guest house.
Impact significance without mitigation: Low (-)
Impact significance with mitigation: Low (-)

Removal of Revetment Will Result in the Undermining and Damage of the Heritage House
The rock revetment provides protection for the house at Erf 90, which is of heritage value to the area (house is older than 60 years). Removal of the revetment will remove the protective measures that

protect the house from tidal surges and coastal waves, resulting in subsequent undermining and damage / ruin to the heritage house.
Impact significance without mitigation: Medium (-)
Impact significance with mitigation: Medium (-)

Removal of Revetment Will Result in Erosion and Undermining and Damage to House and Property at Erf 90
The removal of the revetment will result in undermining and damage to the house at Erf 90, it will also result in the subsequent damage to the entire property at Erf 90, this will have a possible visual impact to people who visit Leentjiesklip, as well as surrounding neighbours in the area.
Impact significance without mitigation: Low (-)
Impact significance with mitigation: Low (-)

10. OTHER MANAGEMENT, MITIGATION AND MONITORING MEASURES

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

Not applicable as the revetment has been constructed and no activities will occur on site.

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

Not applicable as the revetment has been constructed and no activities will occur on site.

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

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

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

The assessment methods are in accordance with the current protocols and the requirements thereof and as such are considered adequate for this assessment. The methodology used by each specialist is included below.

Terrestrial Biodiversity Assessment:

Methodology:
Terrestrial Biodiversity Assessment was done by means of a desktop analysis and a site visit. The methodology broadly entailed the following:

The desktop assessment entailed the following:

- Review of available GIS layers relating to biodiversity conservation planning e.g. vegetation types, threatened ecosystems, relevant provincial spatial conservation or biodiversity plan, Important Bird Areas (IBAs), Protected Areas Database etc.;
- Review of all relevant literature including distribution data of fauna expected to occur on the site, as well as the conservation status of species.

Field survey:
The study area was surveyed on foot over a single day on the 5th of February 2025, during the Summer season. Surveying included unconstrained point sampling through search meanders. The study area landscape contains only a low number of avifaunal and butterfly species, with no notable presence of mammals, reptiles or amphibians (Section 5). Avifaunal species were identified by visual observation, using a 180x zoom lens, or by auditory means. Butterfly species were identified and photographed from less than one meter away. All observations were recorded by GPS and the species were photographed using a digital camera (Canon PowerShot SX430 IS, Canon Inc, USA).

Study Aims:
This study represents an assessment of the terrestrial biodiversity over the affected project footprint,

focussing specifically on faunal and avifaunal diversity and abundances, habitat composition and ecosystem integrity and -dynamics. As such, the aims of this investigation were to:
1.) Assess, define and create a spatial rendering of the ecological condition and composition of terrestrial habitats across the study area based on information gathered during the field survey as well as through a desktop assessment using the latest satellite imagery, and
2.) compile a faunal species list within the study area through field surveying so as to assess the ecosystem integrity of the site from a faunal perspective, as well as establish the faunal profile of the site to determine likely impacts from the development.

Coastal Protection Assessment:

Methodology:
The Coastal Protection Assessment was done by means of a desktop analysis and a site visit. The methodology broadly entailed the following:

Desktop analysis:
- Review of existing data on coastal erosion since 2000;
- Review of Coastal Vulnerability Assessment by the CSIR (2023);
- Review of climate change data;
- Analysis of revetment design drawing

Field survey:
Site visit was done by Dr. Allan Wijnberg to investigate the revetments current condition and functionality.

(b) Please describe the assessment criteria used.

The assessment criteria utilised in this environmental impact assessment is based on, and adapted from, the Guideline on Impact Significance, Integrated Environmental Management Information Series 5 (Department of Environmental Affairs and Tourism (DEAT), 2002) and the Guideline 5: Assessment of Alternatives and Impacts in Support of the Environmental Impact Assessment Regulations (DEAT, 2006).

(c) Please describe the gaps in knowledge.

It is unknown what climate change will do to the wilderness area or the rock revetment in the next 50 or 100 years. We are unsure about the impacts that the ocean will have on this area.

The historic photos and some of the information used in this report was supplied by Mr. Pallister, who we believe has been honest and upfront.

(d) Please describe the underlying assumptions.

It is assumed that all the information provided by the specialists and on which the report is based is correct and valid at the time receipt thereof.

Terrestrial Biodiversity Assessment:
"The content of this report is based on the author's best scientific and professional knowledge as well as available information. Since environmental impact studies deal with dynamic natural systems,

additional information may come to light at a later stage which is not listed in this report. As such, the conclusions and recommendations made in this report are done in good faith based on information gathered at the time of the investigation."

(e) Please describe the uncertainties.

It is unknown what climate change will do to the wilderness area or the rock revetment in the next 50 or 100 years. We are unsure about the impacts that the ocean will have on this area or the rock revetment. It remains and uncertainty, not a given.

SECTION H: RECOMMENDATIONS OF THE EAP

In my view (EAP), the information contained in the Application and the documentation attached hereto is sufficient to make a decision in respect of the activity applied for.	**YES**	NO

If "NO", list the aspects that should be further assessed through additional specialist input/assessment:		
If "YES", please indicate below whether in your opinion the applicant should be directed to cease the activity or if it should be authorised:		
Applicant should be directed to cease the activity:	YES	**NO**
Please provide reasons for your opinion		
Not Applicable, Rock revetment completed in October 2003.		
If you are of the opinion that the activity should be authorised, then please provide any conditions, including mitigation measures that should in your view be considered for inclusion in an authorisation.		
If the revetment needs to be maintained after storm events all necessary permits and authorisations need to be obtained prior to undertaking the work. Vegetation must also be re-established as soon as possible to limit the visual impact.		

SECTION I: REPRESENTATIONS – RESPONSE TO AN INCIDENT OR EMERGENCY SITUATION

This section is only applicable to instances where Section 49A (2) of NEMA applies. Please list all steps that where taken in response to the incident or emergency situation.
Not Applicable.

Please note:

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

SECTION J: PUBLIC PARTICIPATION

1. PUBLIC PARTICIPATION PROCESS TO BE FOLLOWED

1.1 THE PUBLIC PARTICIPATION PROCESS IN TERMS OF THE SECTION 24G FINE REGULATIONS, 2017

Regulation 8 of the Section 24G Fine Regulations require that all applicants must conduct public participation **prior to submission** of a section 24G application (as outlined in Annexure A of the Section 24G Fine Regulations - Section D: Preliminary Advertisement).

"The applicant must place a preliminary advertisement in-
(1) A local newspaper in circulation in the area in which the activity was, or activities were, commenced; and on the applicant's website, if any.
(2) This advertisement must comply with the requirements set out in Annexure A, Section D of the Section 24G Fine Regulations, 2017.
(3) The applicant must open and maintain of a register of interested and affected parties.
*(4) The **register must be attached to the application form and included in the report**, or form part of the information submitted in terms of section 24G(1) of the Act, which the register must, as a minimum, contain the names, contact details and addresses of-* *(a) all persons who, as a consequence of the public participation process conducted in respect of the application, have submitted written comments or attended meetings with the applicant or any environmental assessment practitioner or other specialist appointed by the applicant to assist with the application;* *(b) all persons who have requested the applicant, in writing, to place their names on the register; and* *(c) all organs of state that have jurisdiction in respect of the activity to which application relates."*

Please provide a summary of the steps followed where public participation was undertaken in accordance with Regulation 8 prior to submission of this Application Form. Ensure that proof of compliance with Regulation 8 is submitted with this Application Form, including, *inter alia*, proof of preliminary advertisement in a local newspaper.		
To be updated after PP is undertaken.		
Please indicate whether the applicant has a website (please tick relevant box):	YES	NO
If yes, please note that the application information as specified above must have been advertised on such website and proof thereof must accompany this application.		

Please note: Annexure A: Section D attached to this Application form must be strictly adhered to.

1.2 THE PUBLIC PARTICIPATION PROCESS IN TERMS OF NEMA EIA REGULATIONS, 2014

As the applicant, you may be directed to conduct the public participation process that fulfils the requirements outlined in Chapter 6 of the EIA Regulations, 2014. In doing so, you must take into account any applicable guidelines published in terms of Section 24J of NEMA, the Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations, 2014 as well as any other guidance provided by the Department. Note that the public participation requirements are applicable to all proposed sites.

Please highlight the appropriate box below to indicate the public participation process that has been or will be undertaken to give notice of the application to all potential interested and affected parties, including deviations that may be agreed to by the competent authority:

1. In terms of regulation 41 of the EIA Regulations, 2014 -		
(a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of -		
(i) the site where the activity to which the application relates is or is to be undertaken; and	**YES**	DEVIATION
(ii) any alternative site	**NOT APPLICABLE**	
(b) giving written notice, in any manner provided for in section 47D of the NEMA, to –		

(i) the occupiers of the site and, if the applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	YES	DEVIATION	**N/A**
(ii) owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	**YES**	DEVIATION	
(iii) the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;	**YES**	DEVIATION	
(iv) the municipality (Local and District Municipality) which has jurisdiction in the area;	**YES**	DEVIATION	
(v) any organ of state having jurisdiction in respect of any aspect of the activity; and	**YES**	DEVIATION	
(vi) any other party as required by the Department;	**YES**	DEVIATION	N/A
(c) placing an advertisement in -			
(i) one local newspaper; or	**YES**	DEVIATION	
(ii) any official *Gazette* that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;	YES	DEVIATION	**N/A**
(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken	YES	DEVIATION	**N/A**
(e) using reasonable alternative methods, as agreed to by the Department, in those instances where a person is desirous of but unable to participate in the process due to— (i) illiteracy; (ii) disability; or (iii) any other disadvantage.	YES	DEVIATION	**N/A**
If you have indicated that "DEVIATION" applies to any of the above, then Section 2. below must be completed.			
NOTE: 2. The NEM: WA requires that a notice must be placed in at least two newspapers.			
If applicable, have/will an advertisement be placed in at least two newspapers?	YES	NO	
If "NO", then an application for exemption from the requirement must be applied for.			

1. **Provide a list of all the state departments that has been / will be consulted:**		
List of State Depts.	**Comment obtained (YES/NO**	**If not, provide reasons**
Cape Nature		
Western Cape Government: DEADP		
DEA&DP: Coastal Management		
Heritage Western Cape		
DEA&DP: Biodiversity and Coastal Management		
National Department of Forestry, Fisheries and the Environment		
Ward councillor – Ward 4		
Acting Municipal Manager: George Municipality		
Garden Route District Municipality		
DFFE: Oceans and Coasts		
Cape Nature: Marine and Coasts Operations Specialist		

2. **Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues raised were incorporated, or the reasons for not being incorporated or addressed.** **(The details of the outcomes of this process, including supporting information must be included in the Comments and Report to be attached to this application as Appendix G.)**

3. **Provide a summary of any conditional aspects identified / highlighted by any Organs of State, which have jurisdiction in respect of any aspect of the relevant activity.**

Please note:

- **A list of all the potential interested and affected parties, including the organs of State must be opened, maintained and made available to any person requesting access, in writing, to the register.**
- **All comments of interested and affected parties on the Application Form and Additional Information must be recorded, responded to and included in the Comments and Responses Report attached as Appendix G to the Application. The Comments and Responses Report must also include a description of the Public Participation Process followed.**
- **The minutes of any meetings held by the EAP with interested and affected parties and other role players which record the views of the participants must also be submitted as part of the public participation information to be attached to the additional information/Environmental Impact Report as Appendix G.**
- **Proof of all the notices given as indicated, as well as of notice to the interested and affected parties of the availability of the Application Form/Additional Information must be submitted as part of the public participation information to be attached to the application as Appendix G.**

2. REPRESENTATIONS REGARDING DEVIATION FROM PUBLIC PARTICIPATION REQUIREMENTS IN TERMS OF THE EIA REGULATIONS, 2014

Please provide detailed reasons (representations) as to why it would be appropriate not direct you to comply with all of the requirements and to deviate from the requirements of regulation 41 as indicated above.

3. LIST OF STATE DEPARTMENTS

Section 24(O)(2) obliges the relevant authority to consult with every State department that administers a law relating to a matter affecting the environment when such authority considers an application for an environmental authorisation.

Provide a list of all the State departments that will be/have been consulted, including the name and contact details of the relevant official.		
State Department	Name of person	Contact details
Cape Nature	Megan Simons	msimons@capenature.co.za
Western Cape Government: DEADP	Gavin Benjamin	gavin.benjamin@westerncape.gov.za
DEA&DP: Coastal Management	Ms M Laros	marlene.laros@westerncape.gov.za
Heritage Western Cape	Stephanie-Ann Barnardt	stephanie.barnardt@westerncape.gov.za
DEA&DP: Biodiversity and Coastal Management	Ms. Ieptieshaam Bekko	Ieptieshaam.Bekko@westerncape.gov.za
National Department of Forestry, Fisheries and the Environment	Branch: Oceans and Coast	OCEIA@dffe.gov.za / coastal.enquiries@westerncape.gov.za
Ward councillor – Ward 4	Marlene Barnardt	mviljoen@george.gov.za
Acting Municipal Manager: George Municipality	Godfrey Louw	mmreception@george.gov.za
Garden Route District	Nina Viljoen	nina@gardenroute.gov.za

Municipality		
Cape Nature: Marine and Coasts Operations Specialist	Keith Spencer	kspencer@capenature.co.za

Please note:

A State department consulted in terms of Section 24O(2) of NEMA and Regulations 3(4) and 43(2) must within 30 days from the date of the Department/EAP's request for comment, submit such comment in writing to the Department. The applicant/EAP is therefore required to inform this Department in writing when the application/relevant information is submitted to the relevant State Departments. Upon receipt of this confirmation, this Department will in accordance with Section 24O (2) & (3) of the NEMA inform the relevant State Departments of the commencement date of the 30-day commenting period.

PART 2 – ANNEXURE A TO THE SECTION 24G APPLICATION FORM

SECTION A: DIRECTIVES

Section 24G(1) of NEMA provides that on application by a person who has commenced with a listed or specified activity without an environmental authorisation in contravention of section 24F(1); or a person who has commenced, undertaken or conducted a waste management activity without a waste management licence in terms of section 20(b) of the National Environment Management: Waste Act, 2008 (Act 59 of 2008) ("NEM:WA") the Minister, the Minister responsible for mineral resources or the MEC concerned (or the official to which this power has been delegated), as the case may be, may direct the applicant to-

i	*immediately cease the activity pending a decision on the application submitted in terms of this subsection*	
ii	*investigate, evaluate and assess the impact of the activity on the environment*	
iii	*remedy any adverse effects of the activity on the environment*	
iv	*cease, modify or control any act, activity, process or omission causing pollution or environmental degradation*	
v	*contain or prevent the movement of pollution or degradation of the environment*	
vi	*eliminate any source of pollution or degradation*	
vii	*compile a report containing-*	
	aa	*a description of the need and desirability of the activity*
	bb	*an assessment of the nature, extent, duration and significance of the consequences for or impacts on the environment of the activity, including the cumulative effects and the manner in which the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity*
	cc	*a description of mitigation measures undertaken or to be undertaken in respect of the consequences for or impacts on the environment of the activity*
	dd	*a description of the public participation process followed during the course of compiling the report, including all comments received from interested and affected parties and an indication of how the issues raised have been addressed*
	ee	*an environmental management programme*
viii	*provide such other information or undertake such further studies as the Minister, Minister responsible for mineral resources or MEC, as the case may be, may deem necessary.*	

You are hereby provided with an opportunity to make representations on any or all of the abovementioned instructions including where you are of the opinion that any of these instructions are not relevant for the purposes of your application setting out the reasons for your assertion. Kindly note further that after taking your representation into account a final directive may be issued.

Please Note:

Notwithstanding the above, subsequent to submission of the application form to the Department, you may be issued with a specific directive in terms of section 24G(1)(i) to (viii), and you will therefore be provided with an opportunity to make further representations as to the specific directive.

The appointed Environmental Assessment Practitioner, on behalf of the applicant, may be directed to compile and submit a report that meets the requirements of section 24G(vii)(aa)-(ee) as specified above.

SECTION B: DEFERRAL OF THE APPLICATION

Section 24G(7) of the NEMA provides that if at any stage after the submission of an application it comes to the attention of the Minister, the Minister responsible for mineral resources or the MEC, that the applicant is under criminal investigation for the contravention of, or failure to comply with, section 24F(1) of the NEMA or section 20(b) of the NEM:WA, the Minister, Minister responsible for mineral resources or MEC may defer a decision to issue an environmental authorisation until such time as the investigation is concluded and-

(a) the National Prosecuting Authority has decided not to institute prosecution in respect of such contravention or failure;
(b) the applicant concerned is acquitted or found not guilty after prosecution in respect of which such contravention or failure has been instituted; or
(c) the applicant concerned has been convicted by a court of law of an offence in respect of such contravention or failure and the applicant has in respect of the conviction exhausted all the recognised legal proceedings pertaining to appeal or review.

Kindly answer the following questions:

Are you, the applicant, being investigated for a contravention of section 24F(1) of the NEMA in respect of a matter that is not subject to this application and in any province in the Republic?	*YES*	***NO***	*UNCERTAIN*
If yes provide details of the offence being investigated and authority conducting the investigation. *If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.*			
Are you, the applicant, being investigated for the contravention of section 20(b) of the NEMWA in respect of a matter that is not subject to this application and in any province in the Republic?	*YES*	***NO***	*UNCERTAIN*
If yes provide details of the offence being investigated and authority conducting the investigation. *If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.*			
Are you, the applicant, being investigated for an offence in terms of section 24F(1) of the NEMA or section 20(b) of the NEMWA in terms of which this application directly relates?	*YES*	***NO***	*UNCERTAIN*
If yes provide details of the offence being investigated and authority conducting the investigation. *If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.*			

If you have answered yes or uncertain to any of the above questions, you are hereby provided with an opportunity to make representations as to why the Minister, Minister responsible for mineral resources or MEC, as the case may be, should not defer the application as he or she is entitled to do under section 24G(7).

SECTION C: QUANTUM OF THE SECTION 24G FINE

In terms of section 24G(4) of the NEMA, it is mandatory for an applicant to pay an administrative fine as determined by the competent authority before the Minister, Minister responsible for mineral resource or MEC may take a decision on whether or not to grant an *ex post facto* environmental authorisation or a waste management licence as the case may be. The quantum of this fine may not exceed R5 million.

Having regard to the factors listed below, you are hereby afforded with an opportunity to make representations in respect of the quantum of the fine and as to why the competent authority should not issue a maximum fine of R5 million.

Please note that Part 1 of this section must be completed by an independent environmental assessment practitioner after conducting the necessary specialist studies, copies of which must be submitted with this completed application form.

Please also include in your representations whether or not the activities applied for in this application (if more than 1) are in your view interrelated and provide reasons therefor.

PART 1: THE IMPACTS OR POTENTIAL IMPACTS OF THE ACTIVITY/ACTIVITIES

Index	Socio Economic Impact Description of variable	Place an "x" in the appropriate box
	The activity is not giving, has not given and will not give rise to any negative socio-economic impacts	x
	The activity is giving, has given, or could give rise to negative socio-economic impacts, but highly localised	
	The activity is giving, has given, or could give rise to significant negative socio-economic and regionalized impacts	
	The activity is resulting, has resulted or could result in wide-scale negative socio-economic impacts.	
	Motivation:	

Index	Biodiversity Impact Description of variable	Place an "x" in the appropriate box
	The activity is not giving, has not given and will not give rise to any impacts on biodiversity	x
	The activity is giving, has given or could give rise to localised biodiversity impacts	
	The activity is giving, has given or could give rise to significant biodiversity impacts	
	The activity is, has or is likely to permanently / irreversibly transform/ destroy a recognised biodiversity 'hot-spot' or threaten the existence of a species or sub-species.	
	Motivation:	

Index	Sense of Place Impact and / or Heritage Impact Description of variable	Place an "x" in the appropriate box
	The activity is in keeping with the surrounding environment and / or does not negatively impact on the affected area's sense of place and /or heritage	x
	The activity is not in keeping with the surrounding environment and will have a localised impact on the affected area's sense of place and/or heritage	
	The activity is not in keeping with the surrounding environment and will have a significant	

impact on the affected area's sense of place and/ or heritage	
The activity is completely out of keeping with the surrounding environment and will have a significant impact on the affected area's sense of place and/ or heritage	
Motivation:	

Index	Pollution Impact Description of variable	Place an "x" in the appropriate box
	The activity is not giving, has not given and will not give rise to any pollution	x
	The activity is giving, has given or could give rise to pollution with low impacts.	
	The activity is giving, has given or could give rise to pollution with moderate impacts.	
	The activity is giving, has given or could give rise to pollution with high impacts.	
	The activity is giving, has given or could give rise to pollution with major impacts.	
	Motivation:	

PART 2: COMPLIANCE HISTORY AND KNOWLEDGE OF THE APPLICANT

Index	Previous administrative action (i.e. administrative enforcement notices) issued to the applicant in respect of a contravention of section 24F(1) of the National Environmental Management Act and/or section 20(b) of the National Environmental Management Waste Act Description of variable	Place an "x" in the appropriate box
	Administrative action was previously taken against the applicant in respect of the abovementioned provisions.	
	No previous administrative action was taken against the applicant but previous administrative action was taken against a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time when the administrative action was taken.	
	Administrative action was **not** previously taken against the applicant in respect of the abovementioned provisions.	x
	Explanation of all previous administrative action taken in respect of the above:	

Index	Previous Convictions in terms of section 24F(1) of the National Environmental Management Act and/or section 20(b) of the National Environmental Management Waste Act Description of variable	Place an "x" in the appropriate box
	The applicant was previously convicted in terms of either or both of the abovementioned provisions.	
	No previous convictions have been secured against the applicant but a conviction has been secured against a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time; or a conviction was secured against a director of the applicant in his or her personal capacity.	
	The applicant has not previously been convicted in terms of either or both of the abovementioned provisions.	x
	Explanation of all previous convictions in respect of the above:	

Index	Number of section 24G applications previously submitted by the applicant Description of variable	Place an "x" in the appropriate box
	Previous applications in terms of section 24G of NEMA were submitted by the applicant.	
	No previous applications have been submitted by the applicant but a previous application(s) have been submitted by a firm(s) on whose board one or more of the	

applicant's directors sit or sat at the relevant time.	
No previous applications have been submitted by the applicant but the applicant sat on the board of a firm that previously submitted an application.	x
Explanation in respect of all previous applications submitted in terms of section 24G:	

PART 3: APPLICANT'S PERSONAL CIRCUMSTANCES

Index	Applicant's legal persona Description of variable	Place an "x" in the appropriate box
	The applicant is a natural person.	x
	The applicant is a firm.	
	Describe the firm:	

Index	Any other relevant information that the applicant would like to be considered.
	Motivate and explain fully: Please note the house was designed and built by Mr Pallister's grandparents. Mr Pallister would like to keep it in perpetuity for his grandchildren. The house is kept in a trust and the money that is generated from the house is used primarily for upkeep and maintenance of the house. Mr Pallister is an 82 year old pensioner of modest means. His wife is 81 years old. Their primary source of income is their pension, which while steady, is relatively modest. They both have numerous ongoing health issues and so face increasing medical expenses. This makes it difficult to manage their growing financial burden. Secondly, while the property did yield modest net incomes in the last three years, the COVID epidemic caused havoc in South Africa's tourism industry. This resulted in significant financial losses and equally significant borrowings for Mr Pallister, the effects of which are still present, albeit at a lower level.

NOTE: An explanation as to why the applicant did not obtain an environmental authorisation and/or waste management licence must be attached to this application.

SECTION D: PRELIMINARY ADVERTISEMENT

When submitting this application form, the applicant must attach proof that the application has been advertised in at least one local newspaper in circulation in the area in which the activity was commenced, and on the applicant's website, if any.

The advertisement must state that the applicant commenced a listed or specified activity or activities or waste management activity or activities without the necessary environmental authorisation and/or waste management licence and is now applying for *ex post facto* approval. It must include the following:

- the date;
- the location;

- the applicable legislative provision contravened; and
- the activity or activities commenced with without the required authorisation.

Interested and affected parties must be provided with the details of where they can register as an interested and affected party and / or submit their comment. At least 20 days must be provided in which to do so.

This advertisement shall be considered as a preliminary notification and the competent authority may direct the applicant to undertake further public participation and advertising after receipt of this application form.

NOTE: Unless protected by law, all information contained in and attached to this application form may become public information on receipt by the competent authority. This application must be attached to any documentation or information submitted by an applicant further to section 24G(1).

PART 3 -

APPENDICES

The following appendices must, where applicable, be attached to this form:

Appendix		Tick the box if Appendix is attached
Appendix A:	**Locality map**	**x**
Appendix B:	**Site plan(s)**	**N/A**
Appendix C:	**Building plans (if applicable)**	**N/A**
Appendix D:	**Colour photographs**	**x**
Appendix E:	**Biodiversity overlay map**	**x**
Appendix F:	**Permit(s) / license(s) from any other organ of state including service letters from the municipality**	**N/A**
Appendix G:	**Public participation information: including a copy of the register of interested and affected parties, the comments and responses report, proof of notices, advertisements, Land owner consent and any other public participation information as required in Section J above.**	**x**
Appendix H:	**Specialist Report(s), if any**	**x**
Appendix I:	**Environmental Management Programme**	**N/A**
Appendix J:	**Supporting documents relating to compliance/enforcement history of the applicant, including but not limited to, Pre-compliance/compliance notices, Pre-directives/directives etc.**	**x**
Appendix K:	**Certified copy of Identity Document of Applicant**	**x**
Appendix L:	**Certified copy of the title deed (or title deeds in the case of linear activities)**	**x**
Appendix M:	**Any Other (if applicable) (describe)**	

Where an application has been made in terms of the waste management activities, please complete and annex Annexure 1 as in the following:

Annexures for waste listed activity/ies supporting information		Tick the box if Annexure is attached
Annexure 1	**Waste listed activities supporting information (as in prescribed attached form)**	
Other	(please list accordingly)	

DECLARATIONS

THE APPLICANT

Note: Duplicate this section where there is more than one applicant

- I GEOFFREY FLEMMER PALLISTER in my personal capacity or duly authorised as TRUSTEE (state capacity) by THE PALLISTER TRUST thereto hereby declare/affirm that all the information contained in this application to be true and correct, and that I:

- am fully aware of my responsibilities in terms of t the National Environmental Management Act of 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations") in terms of NEMA, the National Environmental Management: Waste Act, 2008 (Act 59 of 2008) ("NEM:WA") and all relevant specific environmental management Act(s), and that failure to comply with these requirements may constitute an offence in terms of the environmental legislation;
- appointed the environmental assessment practitioner as indicated above, which meet all the requirements in terms of Regulation 13 of the EIA Regulations to act as the independent Environmental Assessment Practitioner for this application;
- have provided the environmental assessment practitioner and the competent authority with access to all information at my disposal that is relevant to the application;
- am aware that I may be issued with a directive and that I must comply with such a directive;
- am fully aware of the administrative fine to be paid before a decision, with respect to the continuation of the listed activity(ies), will be made;
- will be responsible for the costs incurred in complying with the environmental legislation including but not limited to –
  - costs incurred in connection with the appointment of the environmental assessment practitioner or any specialist appointed in terms of Regulation 13 of the EIA Regulations);
  - costs incurred in respect of the undertaking of any process required in terms of this application;
  - costs in respect of any prescribed fee payable in respect of this application;
  - costs in respect of specialist reviews, if the competent authority decides to recover costs;
  - the provision of security to ensure compliance with the applicable management and mitigation measures; and
  - fine costs
- am responsible for complying with the conditions that might be attached to any decision(s) issued by the competent authority;
- have the ability to implement the applicable management, mitigation and monitoring measures; and
- hereby indemnify, the government of the Republic of South Africa, the competent authority and all its officers, agents and employees, from any liability arising out of, inter alia, the content of any report, any procedure or any action for which the applicant or environmental assessment practitioner is responsible.

am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (

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

Signature of the applicant: _____

Name: GEOFFREY FLEMMER PALLISTER

Name of Firm (if applicable): THE PALLISTER TRUST

Date: 20 JUNE 2023

THE INDEPENDENT ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I .....**Michael Jon Bennett**....., as the appointed independent environmental practitioner ("EAP") hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that I:

- act/ed as the independent EAP in this application;
- regard the information contained in this application to be true and correct, and
- do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the the National Environmental Management Act of 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations") in terms of NEMA, the National Environmental Management: Waste Act, 2008 (Act 59 of 2008) ("NEM:WA") and the relevant specific environmental management Act(s);
- have and will not have any vested interest in the proposed activity proceeding;
- have disclosed, to the applicant and competent authority, any 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 required in terms of the NEMA, the EIA Regulations, the NEM:WA and any specific environmental management Act(s);
- am able to meet the responsibilities in terms of NEMA, the EIA Regulations (specifically in terms of Regulation 13 of the EIA Regulations, 2014) and any specific environmental management Act, and am fully aware that failure to comply with these requirements may constitute and result in disqualification;
- have ensured that information containing all relevant facts in respect of the application was distributed or made available to interested and affected parties and the public and that participation by interested and affected parties was facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- have ensured that the comments of all interested and affected parties were considered, recorded and submitted to the competent authority in respect of the application;
- have kept a register of all interested and affected parties that participated in the public participation process; and
- have provided the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not.
- am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations

Note: The terms of reference must be attached.

Signature of the environmental assessment practitioner:

Sharples Environmental Services cc

Name of company:

23 June 2025

Date:

PART 4 -

ANNEXURE B - SUPPORTING INFORMATION WHERE THE ACTIVITY BEING APPLIED FOR IS A LISTED WASTE MANAGEMENT ACTIVITY/IES (IF RELEVANT)

1. WASTE QUANTITIES

Indicate or specify types of waste and list the estimated quantities (expected to be) managed daily (should you need more columns; you are advised to add more)

Note: In this case of hazardous waste, the National Department of Environmental Affairs is the relevant competent authority to consider the 24G application.

Non-hazardous waste	Total waste handled (tonnes per day)

Source of information supplied in the table above Mark with an "X"

Determined from volumes	
Determined with weighbridge/scale	
Estimated	

1.1. Recovery, Reuse, Recycling, treatment and disposal quantities:

Indicate the applicable waste types and quantities expected to be disposed of and salvaged annually:

TYPES OF WASTE	MAIN SOURCE (NAME OF COMPANY)	QUANTITIES		ON-SITE RECOVERY REUSE RECYCLING TREATMENT OR DISPOSAL	OFFSITE RECOVERY REUSE RECYCLING TREATMENT OR DISPOSAL	OFFSITE DISPOSAL
		Tons/ Month	M^3/ Month	Method & Location	Method & Location and Contractor details	

2. GENERAL

Prevailing wind direction (e.g. NWW)

November – April	
May - October	

The size of population to be served by the facility:

	Mark with "X"	Comment
0-499		
500-9,999		
10,000-199,999		
200,000 upwards		

LANDFILL PARAMETERS (If applicable)

The method of disposal of waste:

Land-building ☐ Land-filling ☐ Both ☐

The dimensions of the disposal site in metres

	At commencement	**After rehabilitation**

The total volume for the disposal of waste on the site:

Volume Available	Mark with "X"	Source of information (Determined by surveyor/ Estimated)
Up to 99		
100-34 999		
35 000- 3,5 million		
>3,5 million		

The total volume already used for waste disposal on the site:

(a) Will the waste body be covered daily	Yes	No
(b) Is sufficient cover material available	Yes	No
(c) Will waste be compacted daily	No	No

If the answers (a) and/or (b) are No, what measures will be employed to prevent the problems of burning or smouldering of waste and the generation of nuisance?

The Salvage method

Mark with an "X" the method to be used.

At source	
Recycling installation	
Formal salvaging	
Contractor	
No salvaging planned	

Fatal flaws for the site:
Indicate which of the following apply to the facility for a waste management activity:

Within a 3000m radius of the end of an airport landing strip	Yes	No
Within the 1 in 50-year flood line of any watercourse	Yes	No
Within an unstable area (fault zone, seismic zone, dolomitic area, sinkholes)	Yes	No
Within the drainage area or within 5 km of water source	Yes	No
Within the drainage area or within 5 km of water source	Yes	No
Within an area adjacent to or above an aquifer	Yes	No
Within an area with shallow bedrock and limited available cover material	Yes	No

Within 100 m of the source of surface water	Yes	No
Within 1km from the wetland	Yes	No

Indicate the distance to the boundary of the nearest residential area metres
Indicate the distance to the boundary of the industrial area metres

Wettest six months of the year

November- April
May -October

For the wettest six-month period indicated above, indicate the following for the preceding 30 years

	Total rainfall for 6 months	**Total rainfall for 6 months**	**Total rainfall for 6 months**
For the 1st wettest year			
For the 2nd wettest year			
For the 3rd wettest year			
For the 4th wettest year			
For the 5th wettest year			
For the 6th wettest year			
For the 7th wettest year			
For the 8th wettest year			
For the 9th wettest year			
For the 10th wettest year			

Location and depth of ground water monitoring boreholes:

Codes of the boreholes	**Borehole locality**	**Depth (m)**	**Latitude**	**Longitude**
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "

Location and depth of landfill gas monitoring test pit:

Codes of the boreholes	**Borehole locality**	**Latitude**	**Longitude**
		° ' "	° ' "
		° ' "	° ' "
		° ' "	° ' "
		° ' "	° ' "
		° ' "	° ' "

		° ' "	° ' "