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# REVISED DRAFT ENVIRONMENTAL IMPACT REPORT

## FOR THE

PROPOSED AMENDMENT OF THE ADDENDUM  
ENVIRONMENTAL AUTHORISATION (REF:  
EG12/2/4/6/D6/35/0011/11) FOR THE PROPOSED  
EAGLES CREEK RESIDENTIAL DEVELOPMENT ON  
PORTIONS 187 AND 188 AND THE REMAINDER OF  
PORTION 47 OF THE FARM VYF BRAKKENFONTEIN  
220, MOSSEL BAY.

IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998), AND THE  
ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014

**PREPARED FOR:** Mr PW Steinberg  
Exact Trade 139 (Pty) Ltd

**DATE:** 11 June 2025

**DEADP EA REF NO:** EG12/2/4/6/D6/35/0011/11  
**DEADP REF NO:** 16/3/3/5/D6/29/0003/25



## PROJECT INFORMATION

<b>Report Ref. No:</b>	EA/ECR/AMD/02/25
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**Abbreviations:**

<b>DEADP</b>	Department of Environmental Affairs and Development Planning
<b>EA</b>	Environmental Authorisation
<b>EIA</b>	Environmental Impact Assessment
<b>EIR</b>	Environmental Impact Report
<b>EMPr</b>	Environmental Management Programme
<b>GN</b>	Government Notice
<b>RoD</b>	Record of Decision
<b>SDP</b>	Site Development Plan
<b>SES</b>	Sharples Environmental Services cc
<b>WULA</b>	Water Use Licence Application

Section	INTRODUCTION
1	

Sharples Environmental Services cc (SES) has been appointed by Exact Trade 139 (Pty) Ltd (the holder environmental authorisation) to apply for the amendment of the Addendum Environmental Authorisation (EA)(REF: EG12/2/4/6/D6/35/0011/11), dated 26 November 2012, for the Proposed Eagles Creek Residential Development on Portion 187 and 188 and the Remainder of Portion 47 of the Farm Vyf Brakkenfontein 220, Mossel Bay.

Eagles Creek Residential Development, located on Portion 187 and 188 and the remainder of Portion 47 of the Farm Vyf Brakkefontein no. 220, Mossel Bay, was authorised in 2009 but no water use authorisation was undertaken at the time as it was not required. However, in terms of current NWA requirement, the development must be set back further from the river in order to obtain a WUL. Therefore, the applicant wishes to amend of the addendum EA to set back the currently approved development footprint from the river in order to obtain a water use licence for the development. The set back from the river will result in a loss of 8 group housing units. During the first round of public participation, a seep wetland was discovered and a further 14 group housing units will be lost. The group housing units will decrease from 111 to 89.

The EMPr must still be compiled and will be submitted for approval after the amendment of the EA.

The new SDP will exclude 8 group housing units that are too close to the 1:100 year flood line and 14 group housing units that are on the seep wetland. This will result in less disturbance due to the reduced development footprint.

The amendments of the EA being applied for are:

- Change number of group housing units

The amendment application falls within the ambit of amendments to be applied for in terms of Part 2 of Chapter 5 of the amended Environmental Impact Assessment Regulations (2014). The amendment is therefore subject to public participation. The public participation information will be included in the Final Impact Report. The amendment application form will be submitted to the Department of Environmental Affairs and Development Planning (DEADP) with this Draft Impact Report.

Section	LOCATION
2	

Please refer to Figures 1 to 3, for the locality of the site.

**Table 1: Site location details**

<b>Province:</b>		Western Cape Province
<b>District Municipality:</b>		Garden Route District Municipality
<b>Local Municipality:</b>		Mossel Bay
<b>Ward Number(s):</b>		7
<b>Area / Town / Village:</b>		Mossel Bay
<b>Property Description:</b>		Portions 187 and 188 and the remainder of Portion 47 of the farm Vyf Brakkenfontein 220, Mossel Bay
<b>21 Digit Surveyor General's Number:</b>	<b>188/220</b>	C05100000000022000188
	<b>187/220</b>	C05100000000022000187
	<b>RE/47/220</b>	C05100000000022000047
<b>GPS Coordinates</b>	<b>188/220</b>	Latitude (S): 34° 09'17.01" Longitude (E): 22° 05'26.99"
	<b>187/220</b>	Latitude (S): 34° 09'11.09" Longitude (E): 22° 05'41.51"
	<b>RE/47/220</b>	Latitude (S): 34° 09'21.73" Longitude (E): 22° 05'35.65"



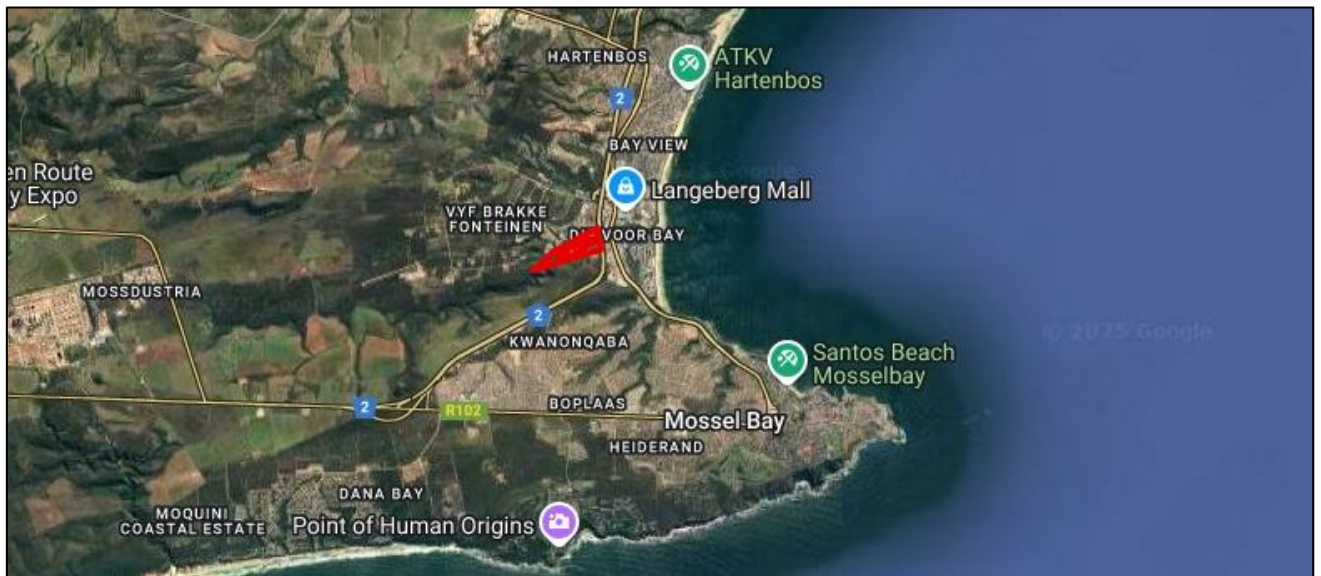


Figure 1: Locality of Eagles Creek

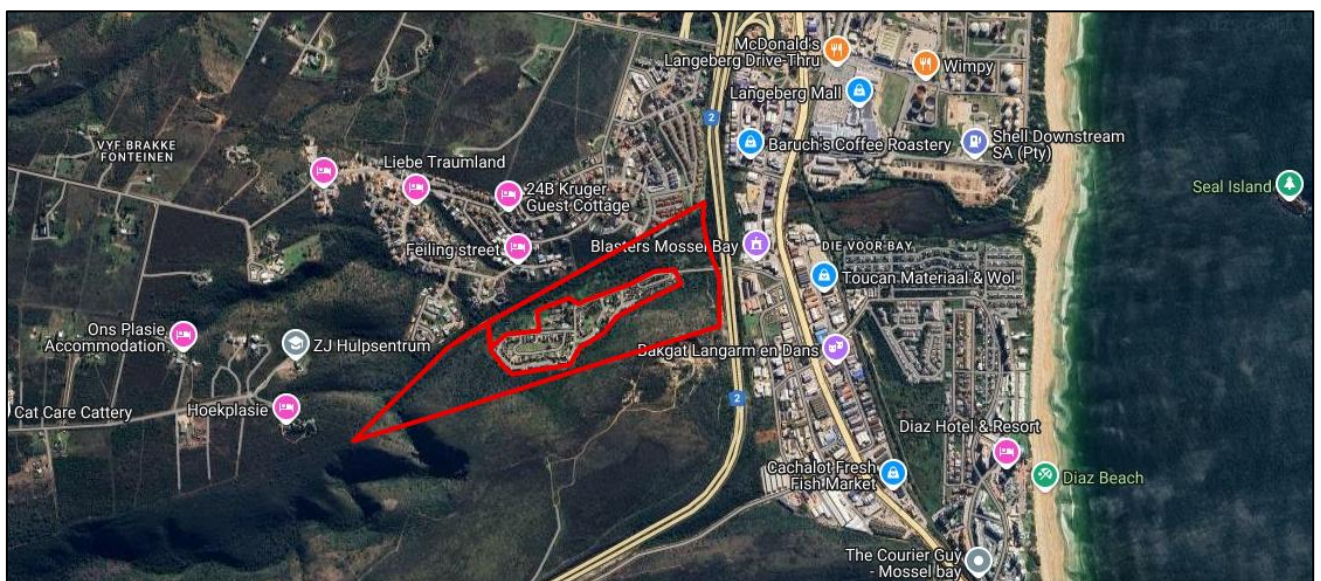


Figure 2: Locality of Eagles Creek

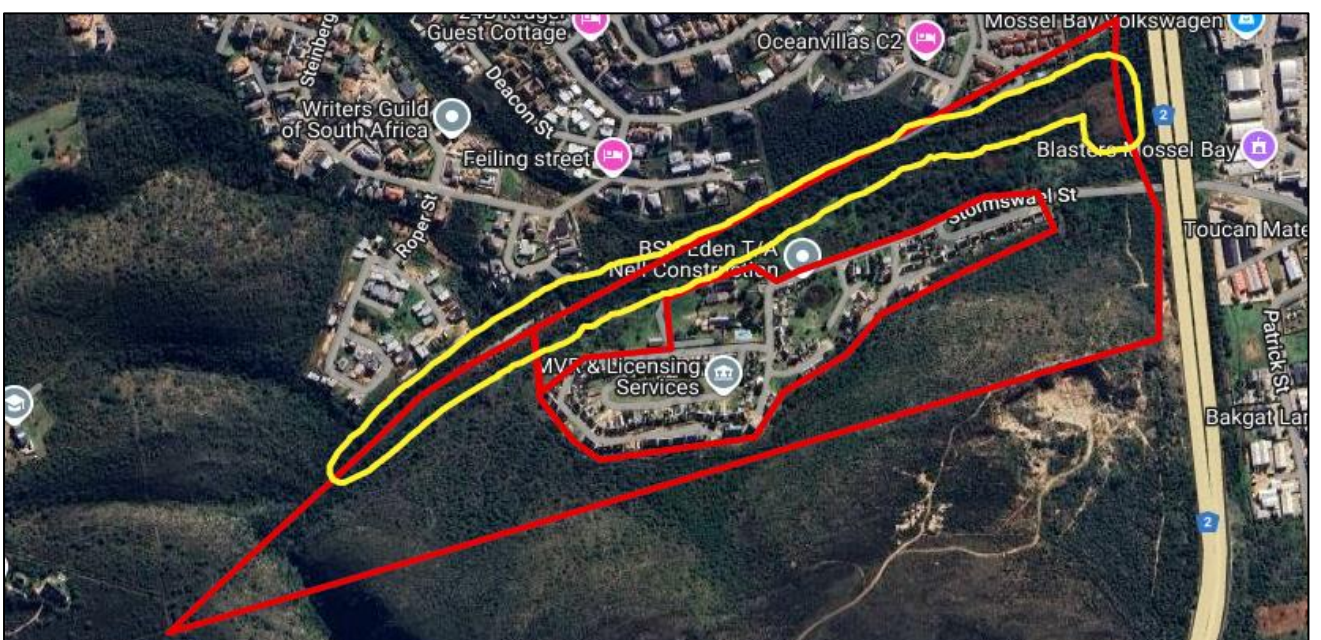


Figure 3: Locality of 15m aquatic buffer (yellow)



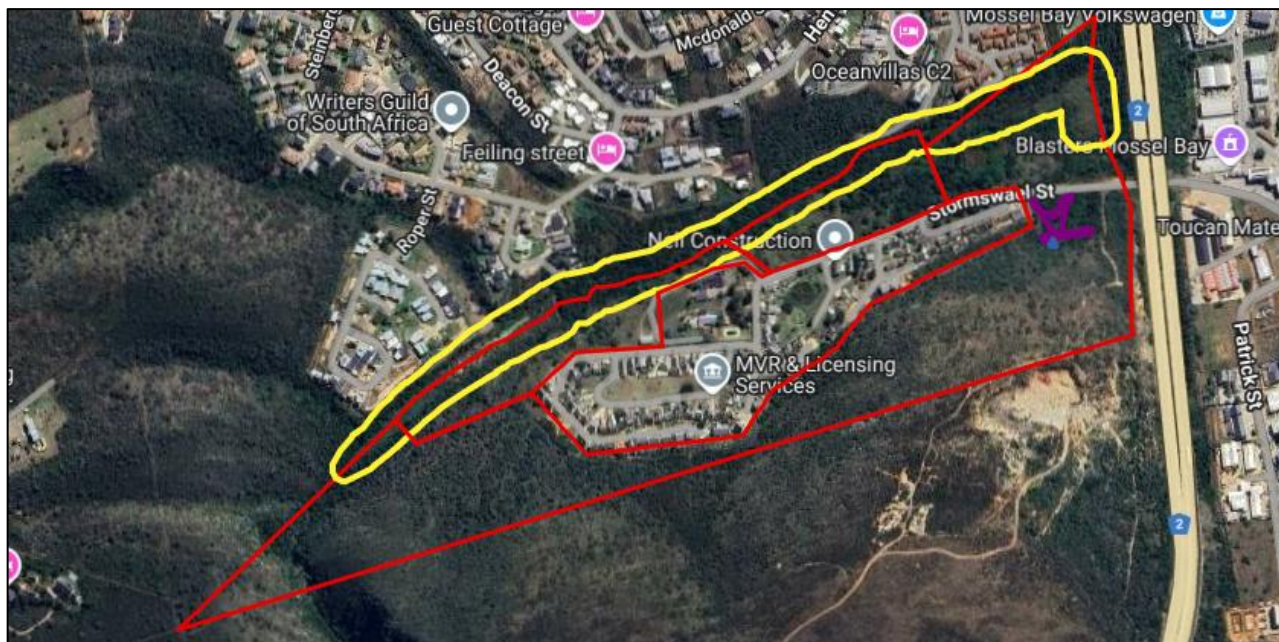


Figure 4: Approx locality of seep wetland (purple) and spring (blue triangle)

Section	
3	<b>BACKGROUND</b>

**The Addendum to the Environmental Authorisation (EA)**, for the amendment of the Environmental Authorisation issued on 14 April 2009 (Reference Number: EG12/2/1-74 Farm 220/187 & Rem of Ptn 47, Mossel Bay (5120) for the proposed Eagles Creek Residential Development on a Portion 187 & 188 and remainder of portion 47 of the farm Vyf Brakkefontein No 220, Mossel Bay, was issued by the Department of Environmental Affairs and Development Planning (DEADP) on 26 November 2012.

The existing Addendum EA (Ref: EG12/2/4/6/D6/35/0011/11) has authorized the following development proposal:

#### Description of the Activity:

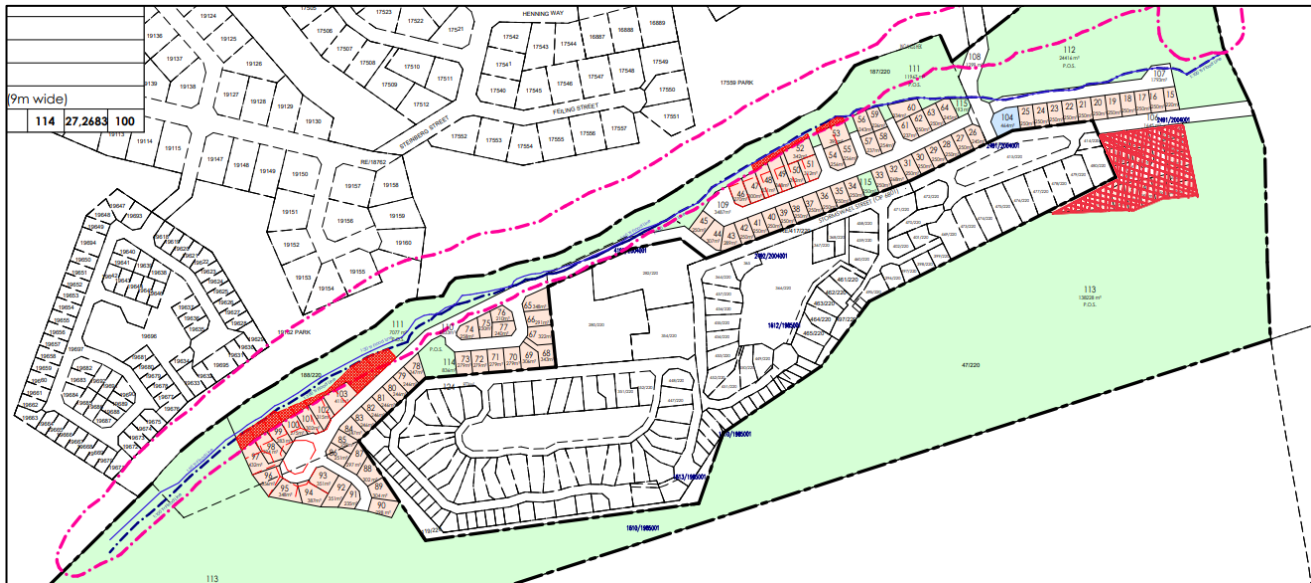
The proposed activity involves a change in land use from zoned agricultural to residential and business use on Portion 187 and 188 and the remainder of Portion 47 of the Farm Vyf Brakkefontein no. 220, Mossel Bay. The proposed development entails the establishment of 111 group housing units (5.98 ha), 1 business erf (0.05 ha) with proposed bulk services and an associated road network (0.87 ha) on Portion 187 and 188 of the Farm Vyf Brakkefontein No 220. The proposed development also includes the construction of a causeway or bridge across the river. Access to the property currently consists of a tarred road and the proposed activity entails the upgrade of the existing road and the creation of a new road across the river. Storm water will be channelled into natural drainages according to the approved engineering drawings.

The holder of the EA therefore proposes to amend the current EA.

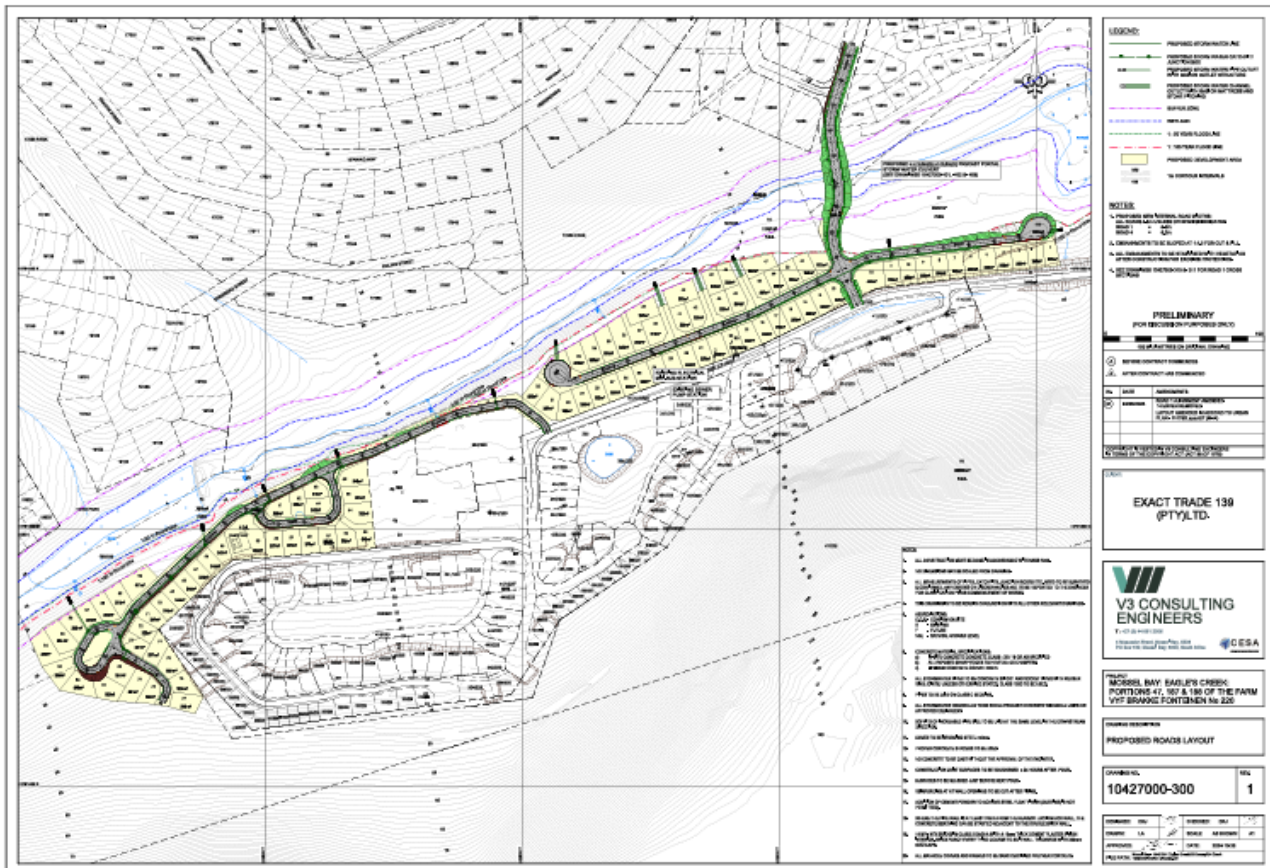
### Proposed changes to the Environmental Authorisation Section A: Description of Activity:

- Change number of group housing units

The houses highlighted in dark red shows the houses to be excluded from the current EA (Figure 5). All other layouts showed, has already excluded the 22 group housing units.



**Figure 5: Group Housing Units to be excluded**



**Figure 6: New proposed road layout**



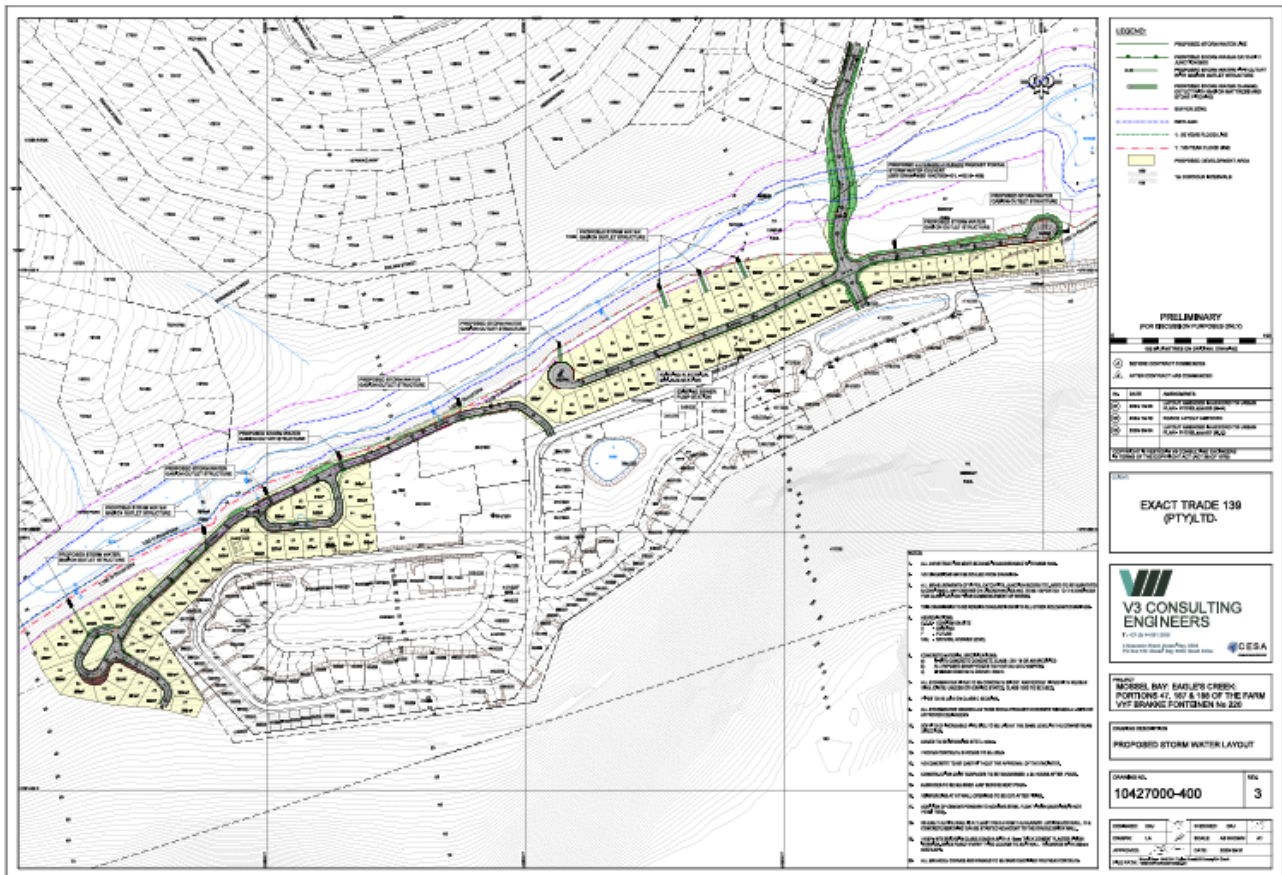


Figure 7: New proposed stormwater layout

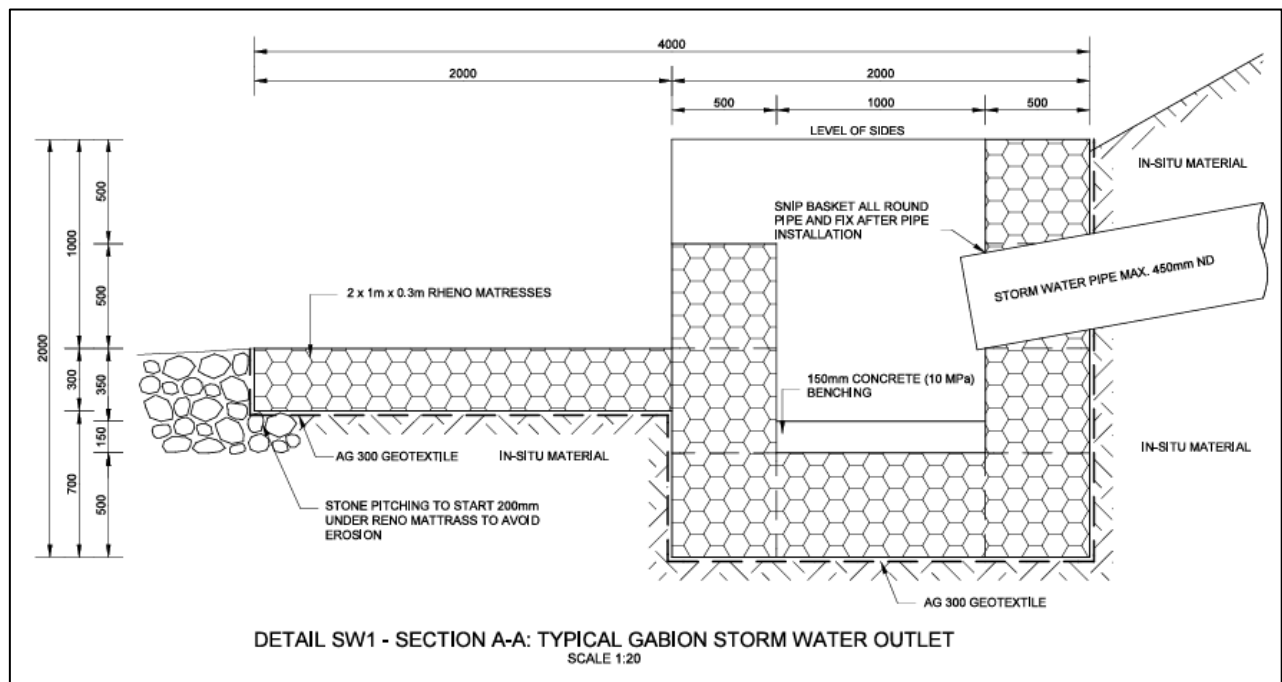
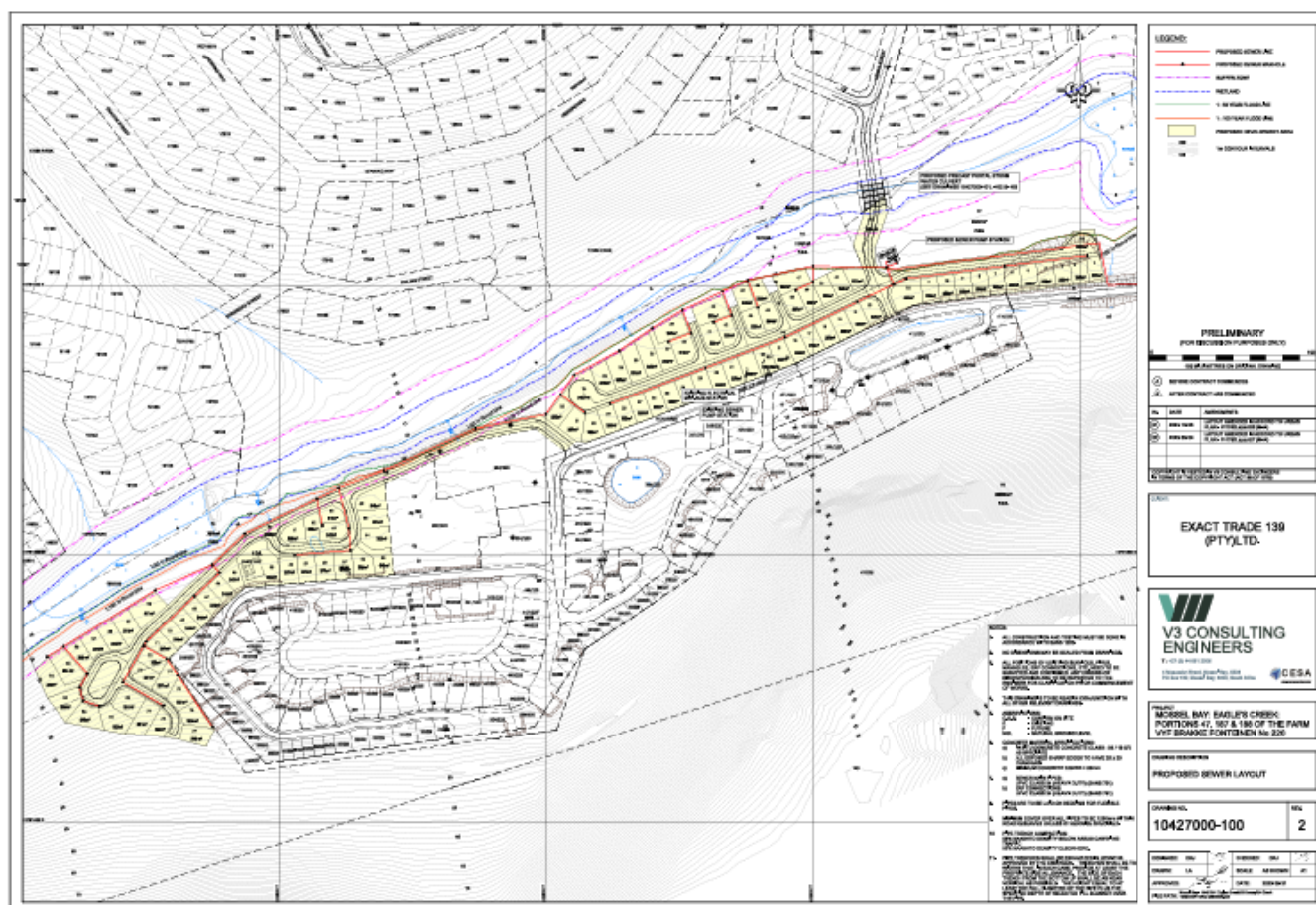
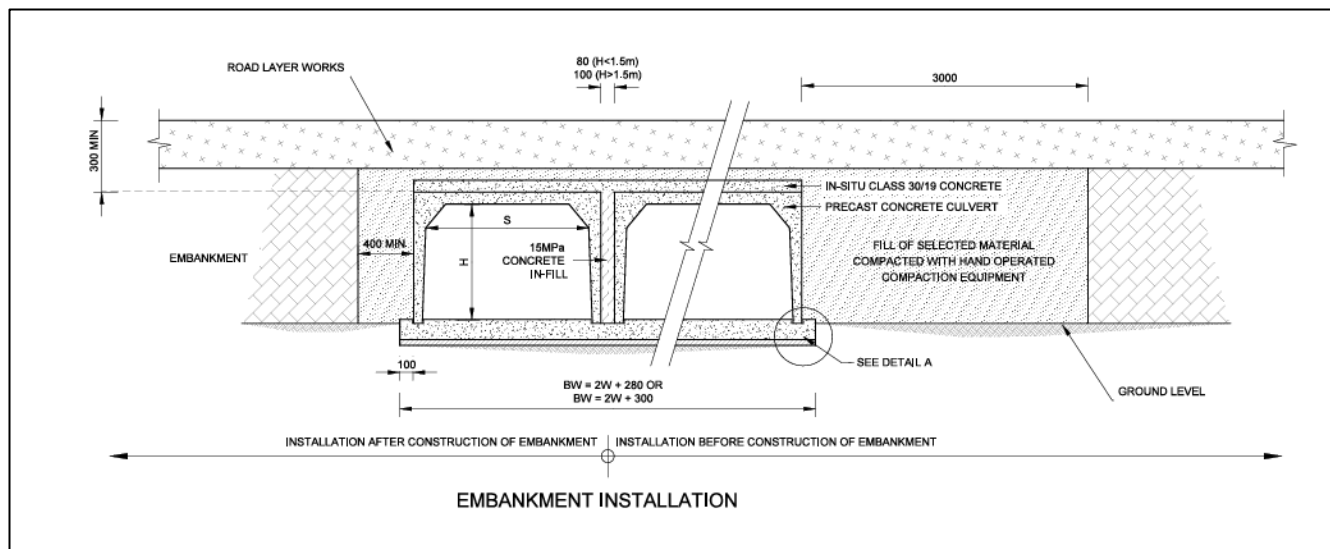


Figure 8: Section drawing of proposed stormwater outlets



Section	PROPOSED AMENDMENTS TO THE EA
5	

The applicant proposes to amend the approved Addendum to the Environmental Authorisation, dated 26 November 2012 (Ref: EG12/2/4/6/D6/35/0011/11).

**Currently the above-mentioned EA Section A Description of Activity reads:**

"The proposed activity involves a change in land use from zoned agricultural to residential and business use on Portion 187 and 188 and the remainder of Portion 47 of the Farm Vyf Brakkefontein no. 220, Mossel Bay. The proposed development entails the establishment of 111 group housing units (5.98 ha), 1 business erf (0.05 ha) with proposed bulk services and an associated road network (0.87 ha) on Portion 187 and 188 of the Farm Vyf Brakkefontein No 220. The proposed development also includes the construction of a causeway or bridge across the river. Access to the property currently consists of a tarred road and the proposed activity entails the upgrade of the existing road and the creation of a new road across the river. Storm water will be channelled into natural drainages according to the approved engineering drawings."

**The EA Section A Description of Activity should be amended to read:**

"The proposed activity involves a change in land use from zoned agricultural to residential and business use on Portion 187 and 188 and the remainder of Portion 47 of the Farm Vyf Brakkefontein no. 220, Mossel Bay. The proposed development entails the establishment of 89 group housing units, 1 business erf with proposed bulk services and an associated road network on Portion 187 and 188 of the Farm Vyf Brakkefontein No 220. The proposed development also includes the construction of a causeway or bridge across the river. Access to the property currently consists of a tarred road and the proposed activity entails the upgrade of the existing road and the creation of a new road across the river. Storm water will be channelled into natural drainages according to the approved engineering drawings."

Section	INPUT FROM SPECIALISTS
6	

The changes to scope of the proposed development and new figures were sent to the aquatic specialist so that he can provide his input and comments on the impacts of the proposed removal of the 8 housing units that are too close to the 1:100 year flood line and the 14 group housing units that are located on the seep wetland. Please refer to Appendix D for the Aquatic Biodiversity Report and Appendix E for the Water Use Licence Application Summary Report.

James Dabroski from Confluent Environmental Pty (Ltd) was appointed to compile the Aquatic Biodiversity Assessment dated June 2025. His report addresses the freshwater biodiversity assessment required for the submission of a WULA and for fulfilment of the EA conditions. The assessment concludes that:

The proposed Eagle Creek development is bordered by a perennial stream and channelled valley bottom wetland along its northern boundary. The upper reach of the watercourse immediately below the dam is consistent with a narrow non-perennial river (stream). There is no wetland vegetation on this embankment and vegetation is characterised by a mixture of indigenous and invasive terrestrial shrubs and trees. The wetland has experienced several modifications over time. The most serious being the construction of the instream dam along the most upstream section of the development and the N2 highway along the eastern boundary of the development. The Present Ecological State (PES) of the wetland is Moderately Modified (C). The watercourse is confined by a very steep embankment which is vulnerable to disturbance typically associated with urban developments (e.g. stormwater runoff and erosion, clearing of natural vegetation for lawns which reduced bank stability, establishment of alien invasive plant species etc.).



The watercourse has a good diversity of habitat at a local scale, consisting of narrow riffle, sections, deeper run and pool sections, a wider section of wetland habitat and a good riparian coverage. The broader macro-channel, including the associated river, riparian and wetland habitat, therefore provides good refuge at a local scale and also provides a good migration corridor for instream and riparian biota connecting the estuary all the way up to undeveloped mountain areas. Given its perennial characteristics, the stream is sensitive to changes in flow. Assimilative capabilities of the wetland are fairly limited, given the modifications to geomorphology and the relatively small size of the wetland. The wetland offers limited direct human benefits, although there is good potential for recreational activities along the entire length of the watercourse (e.g. walking and bird-watching).

Implementation of an adequate sized buffer is therefore considered important for the long-term protection of the watercourse. In this respect the applicant has altered the current SDP to remove several residential erven from the buffer and represents a significant improvement over the original SDP. The access road connecting the eastern and western portion of the development will however remain in the buffer. Given the close proximity of the road to the edge of the very steep embankment, infilling along the embankment or an engineered retaining wall will be required, which will most likely extend into the banks and bed of the watercourse – possibly requiring a partial diversion of the channel of the watercourse. This activity represents a Medium risk to the watercourse, prompting the need for a WULA.

A seep wetland was identified on the Remainder of Portion 47 of Farm 220, south of the access road into the development area. The wetland originates from a spring that discharges from the mountain side. The main modifications to the seep wetland are due to the berm and road which has disrupted and diverted the natural flow of the wetland down the hillslope, resulting in more concentrated flow through the road culvert and into the stormwater channel. The spring is likely to be permanent and has led to the development of a highly organic saturated soil layer above the road. Given the small size of the wetland and its limited habitat diversity, the wetland is unlikely to be important for supporting biodiversity and is of low importance at a landscape scale. Vegetation structure within the wetland provides limited hydro-functional attributes and apart from some potential for abstractive use, provides no direct human benefits.

The SDP has however been modified to avoid this wetland and no impacts to the wetland are anticipated.

Section	<b>ASSESSMENT OF IMPACTS</b>
<b>7</b>	

As indicated in the previous section, none of the proposed changes invoke any impact significance increases to the environment.

Table 2 below which shows the impacts and significance ratings identified in the Aquatic Biodiversity Assessment in correlation with the amended development proposal.

**Table 2:** Aquatic Impacts and Significance Ratings of the Proposed Amendment.

Impact	Approved Development Proposal	Amended Development Proposal
<b>Design Phase</b>		
Design of road crossing on hydrogeomorphological features of wetland	Minor (-)	Minor (-)
Erosion and scouring of instream habitat caused by increased stormwater runoff	Minor (-)	Minor (-)
Modification to instream habitat and channel morphology caused by construction of a section of the access road connecting the western and eastern portion of the development.	Minor (-)	Minor (-)
<b>Construction Phase</b>		
Loss of aquatic habitat caused by construction of infrastructure located in the bed and banks of the watercourse.	Moderate (-)	Minor (-)
Sedimentation of instream habitat caused by construction activities within the watercourse.	Minor (-)	Negligible
Erosion and Sedimentation during site preparation.	Minor (-)	Negligible
<b>Operational Phase</b>		
Fragmentation of riparian and ecological corridors caused by construction of a road and even (Approved Development Proposal) within the recommended buffer.	Minor (-)	Negligible
Degradation of watercourses as a result of increased edge effects, including water quality changes, litter, erosion, dumping and alien invasion associated with localised increase in the residential population.	Moderate/Minor (-)	Negligible

As seen from table 2, the impact significance of the proposed amendments will not increase, it will in fact decrease.

Table 3 below which shows the impacts identified in the original Impact and Scoping Report for the entire development in correlation with the amended development proposal.

**Table 3:** Original Impacts ratings on Proposed Amendment

Impact identified in the Approved Development Proposal	Impact of Amended Development Proposal	Nature of Impact
<b>Construction Phase</b>		
In 2005, a total investment of approximately R 147 million into the local economy as a total building cost. (In 2025, it will be approx. R294 million investment into the local economy.	Reduced (-)	Negative
Housing opportunities	Reduced (-)	Negative
Increased demand on services, especially water and	Reduced (+)	Positive

electricity.		
Increase in traffic volumes in the area.	Reduced (+)	Positive
Impact on the biophysical environment.	Reduced (+)	Positive
<b>Operational Phase</b>		
Employment opportunities	Reduced (-)	Negative
Applicant profit	Reduced (-)	Negative

As seen from table 3, the significance of the impacts identified in the original scoping and impact assessment on the proposed amendments will not increase, it will in fact decrease. All impacts (positive and negative) will decrease.

The new SDP removes residential erven from the buffer and seep wetland and represents a significant improvement over the original SDP. Only risks associated with the new SDP:

- Apart from the bridge and stormwater outlets, the section of access road connecting the western and eastern parts of the development is the only infrastructure located within the buffer. Given the proximity of the road to the edge of the very steep embankment, infilling along the embankment or an engineered retaining wall will be required.
- Construction activities located in the buffer and/or bed and banks of the river are limited to the concrete culvert bridge and stormwater outlets. The use of box culverts for the bridge represents is an acceptable design and is unlikely to result in a significant modification to the flow dynamics.
- The Low risk for stormwater outlets is based on the condition that stormwater will not be discharged onto the unprotected steep embankment and that the outlets incorporate energy dissipation and erosion protection.
- Implementation of a 15 m buffer together with mitigation measures proposed should provide sufficient protection to the watercourse during the construction phase.

**Table 4:** Proposed new layout advantages and disadvantages

<b>Advantages of new proposed SDP</b>	<b>Disadvantages of new proposed SDP</b>
Reduced development footprint	Reduced investment into the local economy
Reduced traffic volumes in the area	Reduced housing opportunities
Reduced impact on the biophysical environment	Decrease in job opportunities
Reduced demand on municipal services	Reduced profit for the applicant.
Alignment with WUL requirements	
Reduced impact on instream habitat of the wetland	
No impact on seep wetland	
Decrease in erosion and sedimentation during site preparation	
Reduced impact on the riparian and ecological corridors	
The degradation of watercourses impact will be reduced to negligible.	



The current SDP was approved before a water use licence (WUL) was applied for. Therefore, in order to obtain a WUL the current SDP must be amended to match the layout being subjected to the WULA.

The development involves the subdivision of these farms into 89 residential erven, including the construction of infrastructure such as a stormwater network, a water and sewage reticulation network and access roads (including a bridge crossing the watercourse). The development is essentially split into a western and eastern section. The two sections are connected via a road that is planned to run immediately adjacent to the watercourse. The residential erven will be located outside of the 1:100 year floodline, immediately adjacent to the southern bank of the watercourse. Some infrastructure – or part thereof - (sewage pipeline, stormwater outlets, and road crossing) falls within or immediately adjacent to the 1:100 year floodline of the river.

A perennial stream grading into a channelled valley bottom wetland (PES – C; Ecological Importance and Sensitivity - Moderate) runs along the northern boundary of the development. The watercourse is confined by a very steep embankment which is vulnerable to disturbance typically associated with urban developments (e.g. stormwater runoff and erosion, clearing of natural vegetation for lawns which reduces bank stability, establishment of alien invasive plant species etc.). A 15 m buffer is therefore deemed necessary to protect the embankment and the watercourse which flows immediately adjacent to it. A seep wetland is also present in the eastern most extent of Remainder 47 of Farm 220. The SDP has however been modified to avoid this wetland and no impacts to the wetland are anticipated.

The final SDP was determined following an initial round of consultation between the author of this report and the developer. The initial design had several erven located within the proposed 15 m buffer. Given the importance of a buffer for protecting the banks, these erven were subsequently removed from the updated layout presented in this report. Furthermore, erven that originally overlapped with the seep wetland were removed from the updated layout. Apart from the bridge and stormwater outlets, the section of access road connecting the western and eastern parts of the development is the only infrastructure that will remain within the buffer. Given the proximity of the road to the edge of the very steep embankment, infilling along the embankment or an engineered retaining wall will be required which will most likely extend into the banks and bed of the watercourse – possibly requiring a partial diversion of the channel of the watercourse. This activity represents a Medium risk to the watercourse, prompting the need for a WULA. All other activities can be mitigated to a Low risk.

The Aquatic Assessment Report has included mitigation measures against the impacts, which will be included in the still to be compiled EMP which will be submitted for approval after the amendment of the EA.

The Figure below compares the current approved SDP to the new proposed SDP and the erven removed from the 15m aquatic buffer and seep wetland. The purple dashed line shows the 15m buffer.

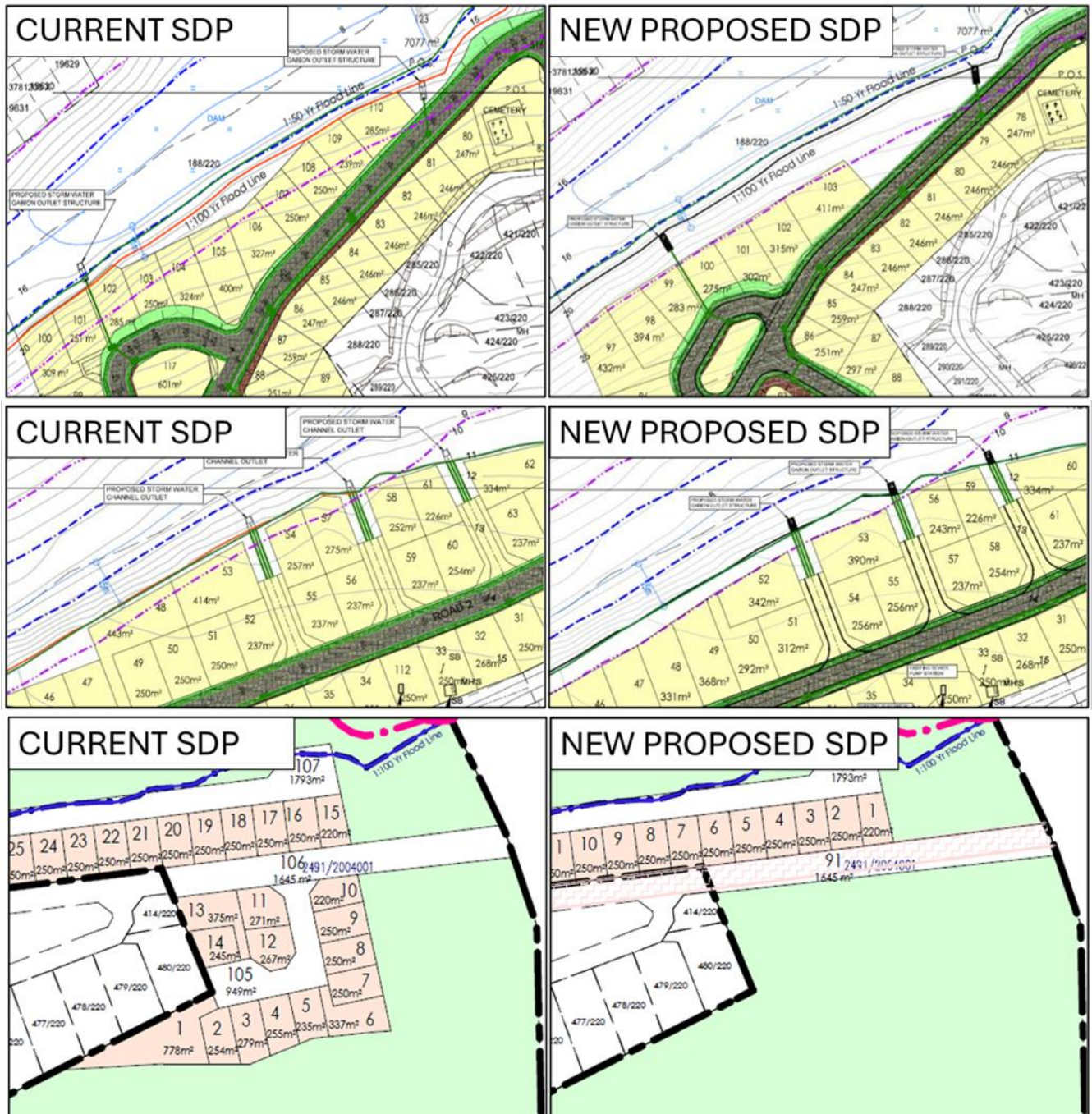


Figure 11: Comparison of the current approved SDP vs the new proposed SDP

Section	
9	<b>SUMMARY OF THE PUBLIC PARTICIPATION PROCESS</b>

A list of registered I&AP's from the previous amendment, dated 26 November 2012, has been obtained. The first round of public participation was completed and all potential I&AP's were notified via post, email or letter drops. Two site notices were erected, and an advert was placed in the Mossel Bay Advertiser, however the wrong end date was published, and a correction advert was printed extending the original PP-date by 4 days.

The comments received and SES's responses to the comments can be found in Appendix G and H. This Revised Draft Report will be made available to the registered I&AP's and authorities for another round of public participation.

#### **Availability of the report and supporting documentation**

The report along with the supporting documentation will be sent to all authorities and register I&AP's via email. The report will also be available on the SES website ([www.sescc.net](http://www.sescc.net)), under the public documents section.

Section	
10	<b>CONCLUSION</b>

In terms of the identified wetlands, the proposed amendments are regarded as positive as the activity and footprint of the estate will decrease. The implementation of a 15 m buffer, the removal of group housings units from a wetland, along with the mitigation measures proposed to be included in the EMP, (which will be compiled and submitted for approval after the amendment of the EA) should provide sufficient protection to the watercourses during the construction phase. As such we believe that the proposed amendments to the EA should be approved.