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

PRE- APPLICATION BASIC ASSESSMENT REPORT

FOR THE

PROPOSED CONSTRUCTION OF A DEVELOPMENT ON PORTION 29 (PREVIOUSLY A PORTION OF PORTION 4) OF FARM RHEEBOKSFONTEIN, NO 142, AS WELL AS PORTION 1 OF FARM 331 RHEEBOKSFONTEIN, IN MOSSEL BAY.

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

PREPARED FOR:	Reebok Ontwikkelings (Pty) Ltd PO Box 2 Little Brak River 6503	**DATE:**	24 April 2026
DEADP REF:	16/3/3/6/7/1/D6/29/0032/26		

Western Cape Government

Department of Environmental Affairs and Development Planning

BASIC ASSESSMENT REPORT

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

APRIL 2024

BASIC ASSESSMENT REPORT

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

APRIL 2024

(For official use only)	
Pre-application Reference Number (if applicable):	
EIA Application Reference Number:	
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

GENERAL PROJECT DESCRIPTION

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

Proposed construction of a development on portion 29 (previously a portion of portion 4) of farm Rheeboksfontein, no 142, as well as portion 1 of farm 331 Rheeboksfontein, in Mossel Bay.

Figure 1: Google Earth map showing the proposed development site.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

15. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA"), the submission of the Report must also be made as follows, for-

Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

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

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

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and

	• a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	
Site Plan:	Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following: • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. • The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. • The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development **must** be clearly indicated on the site plan. • Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. • Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): o Watercourses / Rivers / Wetlands o Flood lines (*i.e.,* 1:100 year, 1:50 year and 1:10 year where applicable); o Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): o Ridges; o Cultural and historical features/landscapes; o Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as **Appendix C**. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as **Appendix D**.
Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as **Appendix A3**.

ACRONYMS

DAFF:	Department of Forestry and Fisheries
DEA:	Department of Environmental Affairs
DEA& DP:	Department of Environmental Affairs and Development Planning

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

ATTACHMENTS

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

The following checklist of attachments must be completed.

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

	Appendix E10:	**Comment from DEA&DP: Pollution Management**	
	Appendix E11:	**Comment from DEA&DP: Waste Management**	
	Appendix E12:	**Comment from DEA&DP: Biodiversity**	
	Appendix E13:	**Comment from DEA&DP: Air Quality**	
	Appendix E14:	**Comment from DEA&DP: Coastal Management**	
	Appendix E15:	**Comment from the local authority**	
	Appendix E16:	**Confirmation of all services (water, electricity, sewage, solid waste management)**	
	Appendix E17:	**Comment from the District Municipality**	
	Appendix E18:	**Copy of an exemption notice**	
	Appendix E19	**Pre-approval for the reclamation of land**	
	Appendix E20:	**Proof of agreement/TOR of the specialist studies conducted.**	
	Appendix E21:	**Proof of land use rights**	
	Appendix E22:	**Proof of public participation agreement for linear activities**	
Appendix F:	**Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.**		
Appendix G:	**Specialist Report(s)**		✓
Appendix H:	**EMPr**		✓
Appendix I:	**Screening tool report**		✓
Appendix J:	**The impact and risk assessment for each alternative**		
Appendix K:	**Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline**		
Appendix L	**Engineering report**		✓

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE: REGION 1		GEORGE OFFICE: BEGION 3
	(City of Cape Town, West Coast District	(Cape Winelands District & Overberg District)	(Central Karoo District & Garden Route District)
Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	Reebok Ontwikkelings (Pty) Ltd		
Name of contact person for Applicant/Proponent (if other):	Mr. Louis Albrecht De Jager		
Company/ Trading name/State Department/Organ of State:	Reebok Ontwikkelings (Pty) Ltd		
Company Registration Number:	2021/486571/07		
Postal address:	PO Box 2 Little Brak River		
		Postal code: 6503	
Telephone:	( )	Cell: +27(0) 83 282 8507	
E-mail:	hennie@karoonetworkbw.co.za	Fax: ( )	
Company of EAP:	Sharples Environmental Services cc		
EAP name:	Michael Bennett (EAP) Onela Mhobo (Candidate EAP) Mazithi Mangcu (Candidate EAP)		
Postal address:	PO Box 9087, George		
		Postal code:	
Telephone:	+27 (0) 44 873 4923	Cell:	
E-mail:	Michael@sescc.net Onela@sescc.net Mazithi@sescc.net	Fax: ( )	
Qualifications:			
EAP registration no:	Michael- 2021/3163 Onela: 2022/4522 Mazithi: 2023/6497		
Duplicate this section where there is more than one landowner Name of landowner:	Reebok Ontwikkelings (Pty) Ltd		
Name of contact person for landowner (if other):	Mr. Louis Albrecht De Jager		
Postal address:	PO Box 2 Little Brak River		
		Postal code:	
Telephone:	( )	Cell: +27(0) 83 282 8507	
E-mail:	hennie@karoonetworkbw.co.za	Fax: ( )	
Name of Person in control of the land:	Reebok Ontwikkelings (Pty) Ltd		
Name of contact person for person in control of the land:	Mr. Louis Albrecht De Jager		
Postal address:	PO Box 2 Little Brak River		
		Postal code: 6503	
Telephone:	( )	Cell: +27(0) 83 282 8507	
E-mail:	hennie@karoonetworkbw.co.za	Fax: ( )	

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	Mossel Bay Municipality	
Contact person:	Mr. Colin Puren (Municipal Manager)	
Postal address:	101 Marsh Street Mossel Bay	
		Postal code: 6500
Telephone	+27 (0) 44 606 5082	Cell:
E-mail:	municipalmanager@mosselbay.gov.za	Fax: ()

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

1.	Is the proposed development (please tick):	New	**X**	Expansion		
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.					
Greenfield site. Portion 1 of farm 331 and portion 29 of farm 142 Rheeboksfontein have not been previously disturbed, therefore regarded as a greenfield site.						
3.	**For Linear activities or developments**					
3.1.	Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:					
3.2.	Development footprint of the proposed development for all alternatives.					m^2
3.3.	Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.					
3.4.	Indicate how access to the proposed routes will be obtained for all alternatives.					
3.5	SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives					
3.6.	**Starting point co-ordinates for all alternatives**					
	Latitude (S)	°	‘	“		
	Longitude (E)	°	‘	“		
	Middle point co-ordinates for all alternatives					
	Latitude (S)	°	‘	“		
	Longitude (E)	°	‘	“		
	End point co-ordinates for all alternatives					
	Latitude (S)	°	‘	“		
	Longitude (E)	°	‘	“		
Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.						
4.	**Other developments**					
4.1.	Property size(s) of all proposed site(s):					m^2
	Portion 1 of farm 331					112649.13 m2
	Portion 29 of farm 142					54110.43m2
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):					m^2
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:					8 1316 m^2
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).					

Figure 2: Locality map

The proposed development will comprise of the following:

- 143 General Residential Zone I erven (average erf size estimate to be 337 m2 approximately 4,6092 ha)
- 1 Utility Zone Sewage Pumpstation erf 144, approximately 708m2
- 1 Utility Zones Electricity substation erf 145, approximately 65m2
- 1 Utility Zones Refuse Collection erf 151, approximately 98m2
- 5 erven Open Space Zone II erven, approximately 2.0572 ha, and
- 1 Open Space Zone III erf zoned as conservation approximately 3.7119 ha
- 1 Transport Zone III erf 152, approximately 1,3831 ha and
- 1 Transport Zone II erf, approximately 3,3905 ha
- Area indicated as pink in the consolidation plan which forms part of the Road Reserve.
- 8m Buffer Area accommodating a 5 m wide berm and a 3 m wide servitude area for sewage pipeline.
- 5.5 m Buffer area accommodating a 2.5m wide strip area and a 3 m wide servitude area for sewage pipeline.

In addition, hereto the following associated infrastructure will be constructed:

- Internal water reticulation network;
- Stormwater drainage structures and stormwater pipelines; and
- Bulk services infrastructure for electricity reticulation, a mini substation and street lighting.

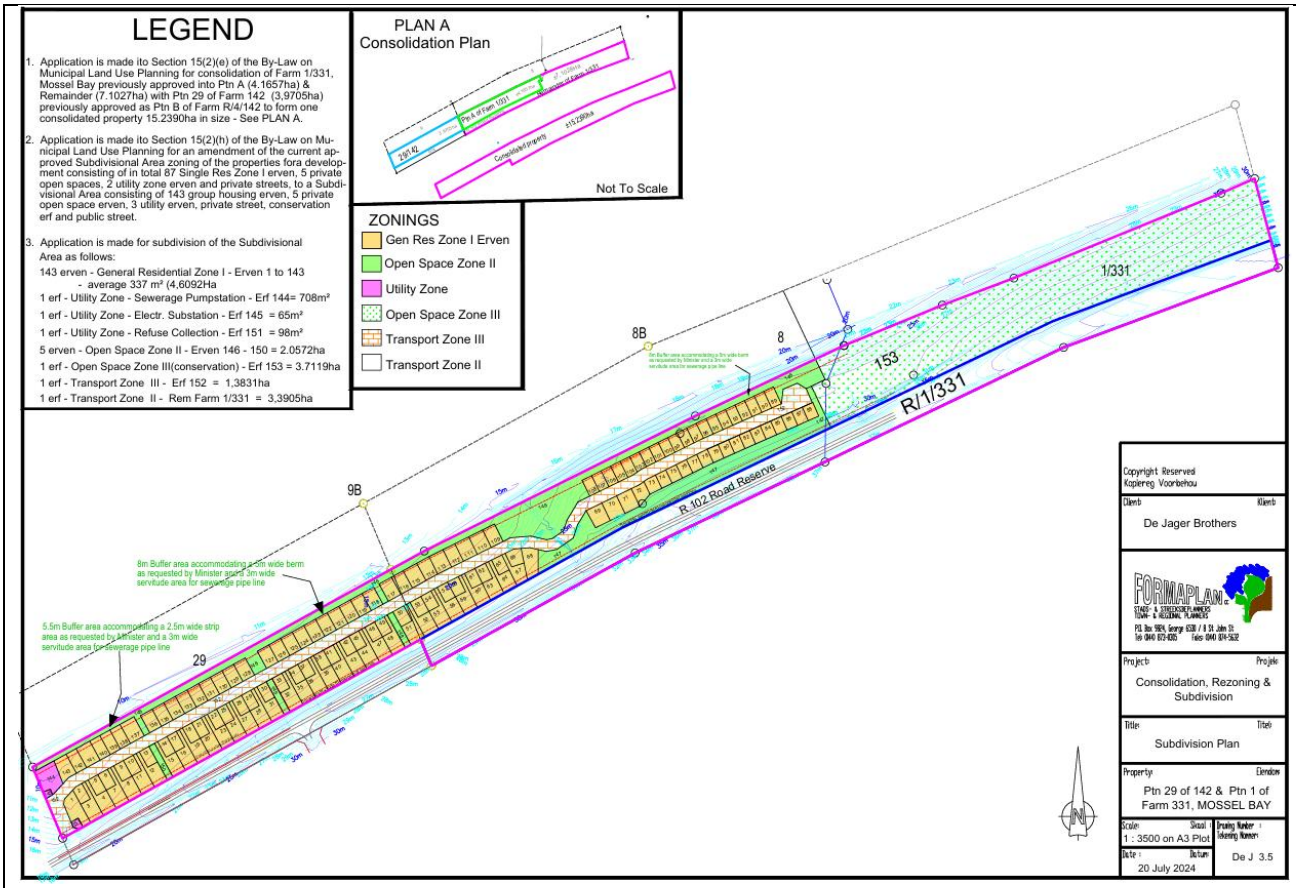

Figure 3: Site Development Plan

It is proposed that the bulk water and sewer services infrastructure will be completed for the entire development at the commencement of works. After the completion of services, the development will be phased starting from the eastern end towards the entrance to minimize the disturbance of construction vehicles on the roads to be utilized. The number of phases is currently anticipated to include three phases, although this will be dependent upon sales. Formal stormwater upgrades will be constructed in line with the phasing of the residential units to ensure that infrastructure is not damaged during subsequent works.

According to the Civil Engineering Services Report dated 05 January 2026:

Proposed Services:

Bulk Water Supply System

Wastewater Treatment Works:

The proposed development is located within the existing Rheebokrif Main Outfall Pump Station (PS) drainage area. The site is located within the greater Great Brak Wastewater Treatment drainage area. As a result, effluent generated from the site will eventually be pumped and drained towards the existing "Great Brak" Wastewater Treatment Plant (WWTP) as indicated on Figure 6, Existing Sewer System Layout attached.

Previous investigation of the bulk sewerage infrastructure, by GLS Consulting, found that the Rheebokrif PS has a total capacity of 52 ℓ/s and currently operates at around 15 % of capacity which indicates sufficient capacity to accommodate the proposed development in the reticulation system. The total design capacity for the seven (7) wastewater treatment plants in the Mossel Bay Municipal area are 22.54 Mℓ per day. The current combined average daily inflow for the seven wastewater treatment plants is 10.72 Mℓ per day.

Wastewater generated from the proposed development will gravitate into the existing system and conveyed by means of gravity sewer lines as well as a sewer pump station to pump sewage through

rising mains into the existing systems to the Great Brak Wastewater Treatment Works, where it will be treated.

According to the Sewer Master Plan for the Municipal area, sufficient capacity exists at the Sewage Treatment Plant within the existing system.

WASTEWATER RETICULATION SYSTEM

A wastewater reticulation system exists within the boundaries of the proposed development. It is proposed that the development will drain to the existing Rheebokrif PS indicated on erf 144 of Portion 29 (Portion of Portion 4) of Farm 142. The existing Rheebokrif PS has a total capacity of 52 ℓ/s and currently operates at around 15 % of capacity which indicates sufficient capacity to accommodate the proposed development. From this point all wastewater generated will be pumped to the Great Brak Wastewater Treatment Plant where it will be treated as can be seen on GLS Sewer Master plan.

STORMWATER

No bulk stormwater outfall systems are required as the stormwater will be dispersed into the existing culverts towards the lower lying northern side of the site underneath the N2 highway, however, all upstream stormwater generated by the existing developed area as well as that from MR344 will have to be dealt with through the proposed development.

It is proposed that the stormwater generated upstream of the development be conveyed through the development by means of both an underground system as well as an emergency overland flow system. A combination of field inlets, open channels and low water drifts will be utilised as part of this system.

Stormwater Management Techniques: During Construction

The stormwater surface run-off water will be managed carefully during construction. The following management techniques will be implemented:

- Temporary cut-off channels and berms; and
- Routing of run-off towards the existing drainage routes.

Stormwater Management Techniques: Post-Construction

The factors to consider in Stormwater Management falls broadly into two main categories, namely those related to quantity and those related to quality.

Any development brings about changes to the natural environment of a site, which in turn has an effect or disrupts the natural hydrological cycle. Changes include, among other:

- Increase in impermeable surfaces (roads, roofs etc.) resulting in lower infiltration, higher run-off volumes and velocities; and
- Changes to natural flow routes through earthworks, infrastructure and shaping of terrain.

Stormwater system design criteria:

The storm water system forms an integral part of the road and urban planning layout. The system rests on three legs, the minor system, the major system and an emergency system. The minor storms are catered for in the pipe system while the major storms are routed through a linked system of roads and public open spaces using attenuation techniques. The emergency system recognizes failure of the minor and major system by storms greater than provided for in major system or in the event of malfunction of the minor system by providing continuous overland flow routes to minimize flooding of residential areas.

The data to be used for the design of the system is as follows:

- Minor system: 2-year return period conveyed in an underground pipe system. Preferably the overland flow shall not exceed 200m.
- Major system: 50-year return period. The difference between the 2 year and 50 years to be conveyed in the road prism with depth not exceeding 150mm within the road reserve width.
- The minimum gradients for pipelines are designed to give a minimum velocity of 0.7m per second with the pipe flowing full.
- The maximum velocity used is 3.5m per second.
- Major storm water overflows are to be provided to convey the excess storm water from the streets into designated public open spaces.

- Storm water flow velocities in road ways will be kept as low as possible and related to the surface finish to prevent scour and erosion.
- Roads are to be graded to ensure free and continuous flow to the main storm water system and to prevent local ponds at intersections.

INFILTRATION
By dispersing the run-off to numerous small outfalls spread across the site, the recharge of the underground water table is promoted.

The provision of strategically placed landscaped areas could promote on-site infiltration where possible. This could reduce the peak flow rate if required.

ATTENUATION
Attenuation functions by the principle of allowing large flows of water to enter a facility but limiting the outflow by having a small opening at the low point in the facility. The difference between in- and outflows is directed to a catchment area.

Attenuation in the form a dam will not be possible in this instance, but rainwater tanks at downpipes from the roof could alleviate peak flows onto hardened surfaces before allowing flow onto erven, roads, channels and catchpits.

With the installation of rainwater tanks, peak flows could be reduced to lower levels than before, which will assist the existing network in dealing with overland stormwater flow.

STORMWATER MANAGEMENT RECOMMENDATIONS
The planning of stormwater design elements must always be seen as a holistic process which incorporates much more than the infrastructural elements required in adequately dealing with stormwater. It affects a range of environmental goals and management principles and aims not only to mitigate negative impacts but actively promote positive modifications in its application.
The design approach to be adopted for the proposed development and as discussed above, can be summarised as follows:

- Promotion of on-site infiltration;
- Minimise concentration of stormwater;
- Maintain pre-development run-off levels as far as possible;
- Identify escape routes for major floods;
- Responsible discharge of stormwater into downstream systems; and
- Allowing for the necessary attenuation in the form of rainwater tanks.

ACCESS ROADS
Access to the proposed development will be from MR344/R102 by means of the existing access road to Rheebokrif Main Outfall Pump Station (PS). This road will be upgraded to a surfaced road and re-aligned as per the drawings attached.

SOLID WASTE
Refuse removal will be dealt with once a week as applicable to all the current residential areas in the Mossel Bay Municipal area.

Solid waste is based on an estimated 3.5 kg/person/day.

It is expected that occupancy should not exceed an average of four (4) people per unit.

FLOODLINES
This proposed development is not directly affected by any Flood line.

INTERNAL SERVICES
The proposed Civil Engineering Services are indicated on Drawing no. KK-P-001-1 to KK-P- 001-3.

STANDARD OF ENGINEERING SERVICES TO BE PROVIDED:
Levels of services are as follows

Sewer

- Pipe diameter: UPVC Class 34, SANS 791, 160mm dia solid wall for main lines and 110mm solid wall for individual unit connections where required.
- Prefabricated Fibre cement shafts or concrete manhole rings to be used for manholes.

Water

- Pipe diameter of 160 mm dia UPVC Class 9/12 pipes depending on residual pressure.
- Each erf will be serviced with a 20mm diameter connection and an Elster Kent/Honeywell plastic water meter in a plastic meter box or similar approved meter by the Technical Services Directorate.
- Provision is made for fire hydrants according to design guidelines.
- All fire hydrants shall be 65 mm dia (internal)
- All fire hydrant outlet shall be of bayonet coupling type.
- All valves shall be AVK type valves – left hand/closing or similar approved.
- Provision is made for a bulk water meter at the connection point.

Roads and stormwater

- The access road width will be 6.0m minimum.
- All road surfaces will be 80mm interlocking concrete paving.
- Sub-base and base materials will be imported.
- Sub-surface drainage, where applicable, will be installed.
- The underground piped stormwater drainage system will be minimum 450mm
- diameter.
- Barrier kerbs will be installed around bell-mouths. Bellmouth's radius minimum 10m.
- All stormwater drains will be provided with a sand trap of at least 300mm.
- Low water drifts to be utilised at natural watercourses to accommodate overland flow.

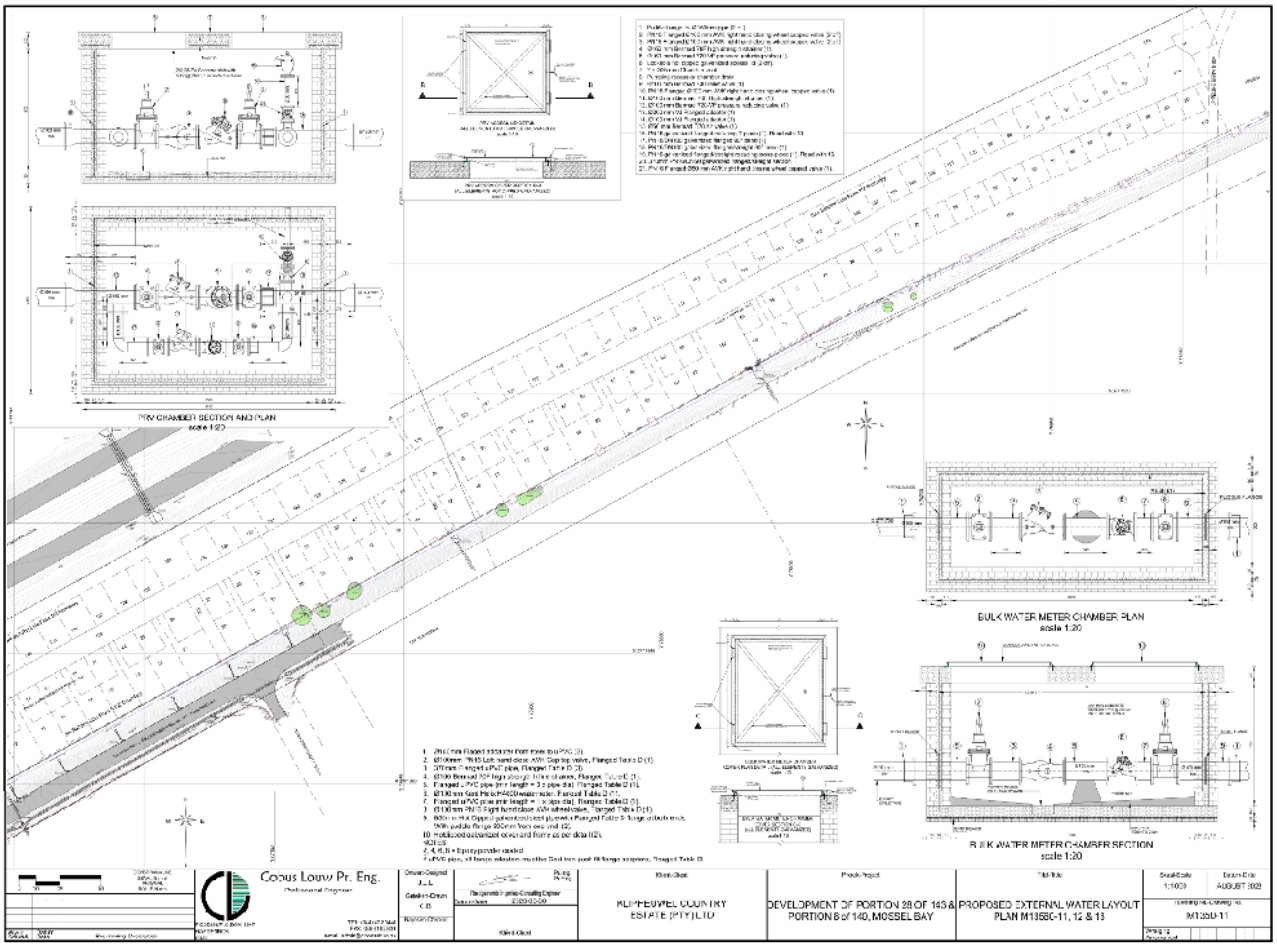

Figure 4: Proposed External Water Layout Plan

Figure 5: Proposed External Water Layout

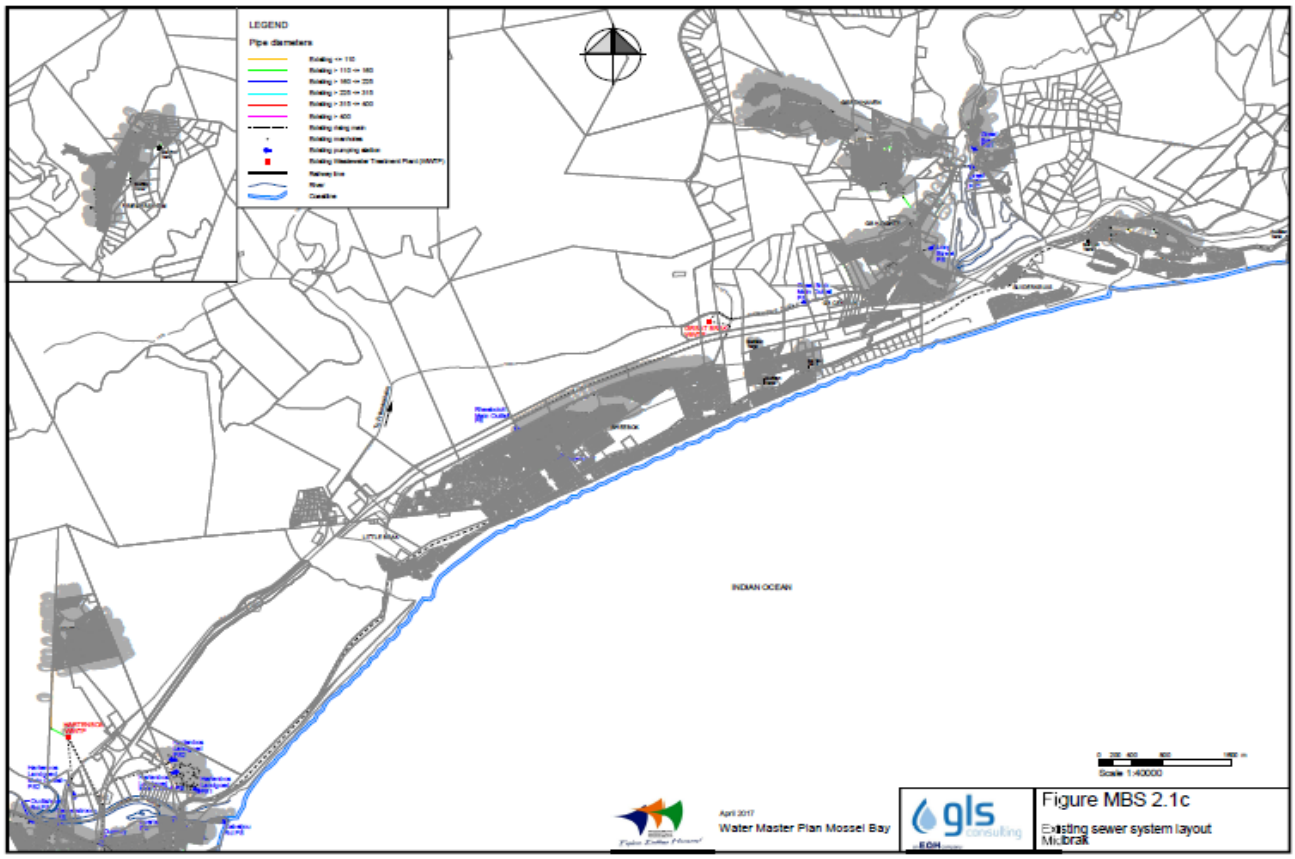

Figure 6: Existing sewer layout Midbrak.

Proposed New Development: Rheebok ERF 142 & 331 submitted by BDE consulting engineers, June 2020 Ref: MOS 282, Revision 3:

Adequate medium voltage capacity exists on the existing overhead lines, to accommodate the two-erven development. The design, supply, and installation of the MV Bulk point, as well as the private LV network, will be done in accordance with the ruling Municipal specifications and requirements.

Impact on existing electricity customers

The development will have a minimal effect on the quality of supply to the existing customers, since the development will be supplied by an underground cable system from the private mini-substation.

Impact on Municipal operating cost

The development will have no negative effect on the electrical operating costs of the supply authority, since the complete electrical infrastructure required for the development will be supplied and installed by the Developers. Electricity sales to the new customers will in fact contribute to the profits made by the supply authority.

Environmental impact

The entire internal electrical distribution network will be carefully designed to blend in with the existing town area of Rheebok as well as the natural environment.

All structures, equipment and switchgear will be low profile, following natural contours.

An environmental management plan for the two-erven development will be applied as it forms an integral part of the specification and requirements for electrical construction work.

Distribution kiosks and streetlight poles will be located within the road reserves to prevent additional disturbance of vegetation.

The figures below are architectural illustrations of the range of housing typologies proposed within the residential development. All the unit typologies include only single storey units.

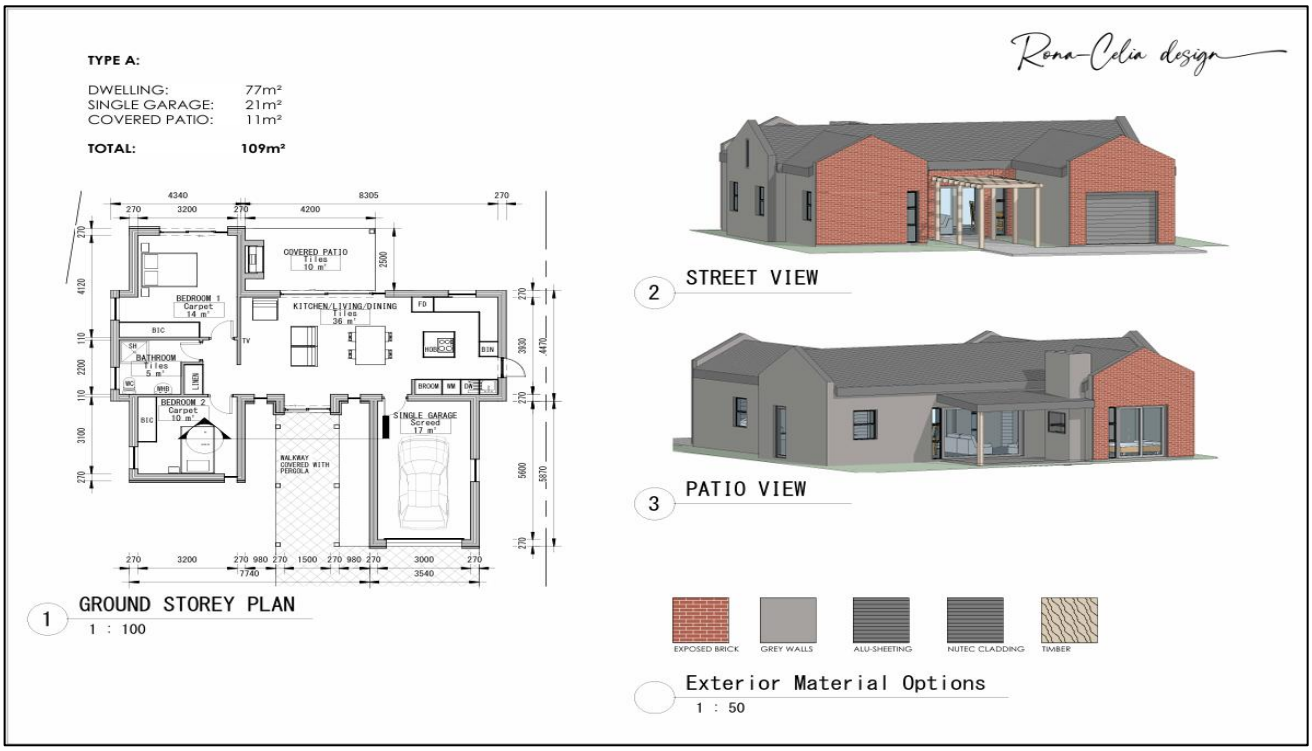

Figure 7: Architectural illustration of housing typology Type A

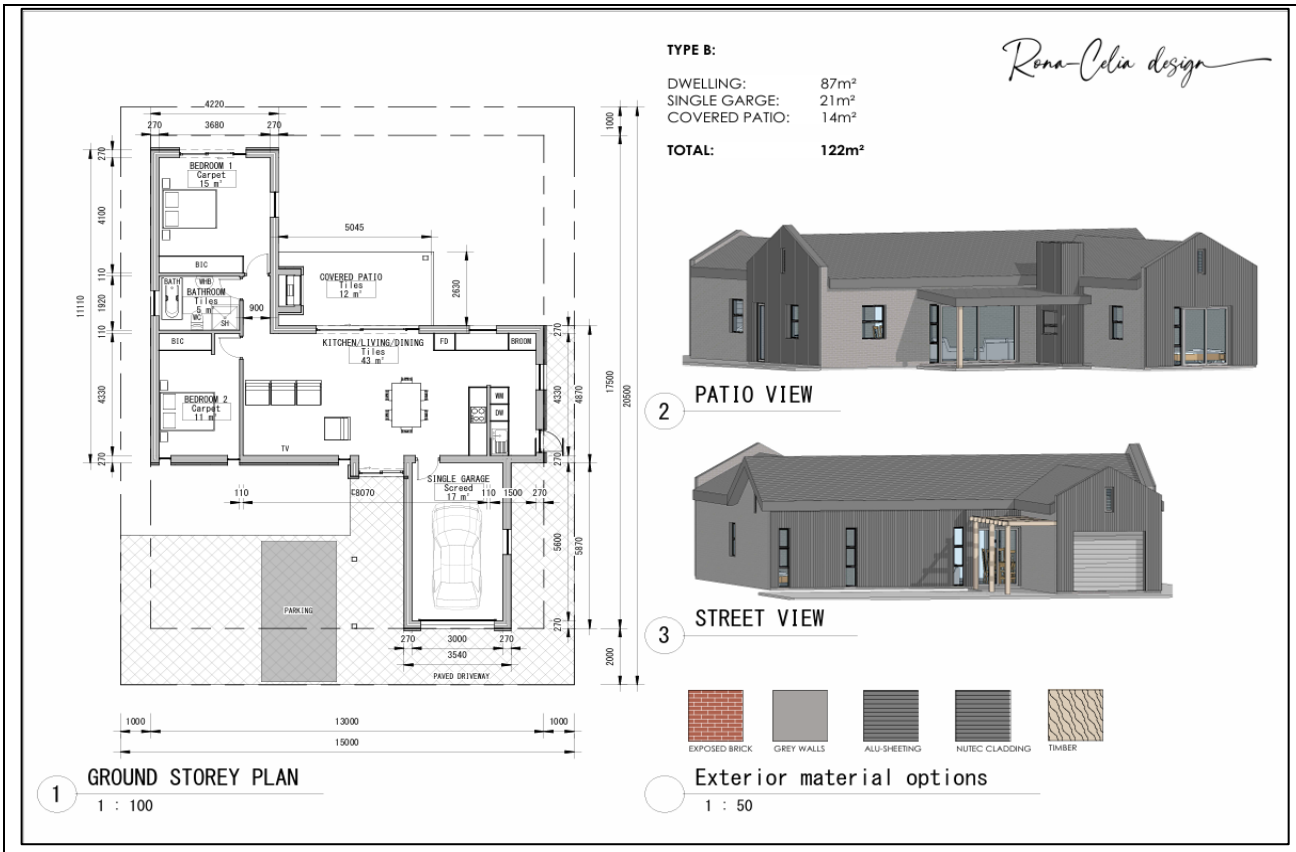

Figure 8: Architectural illustration of housing typology type B

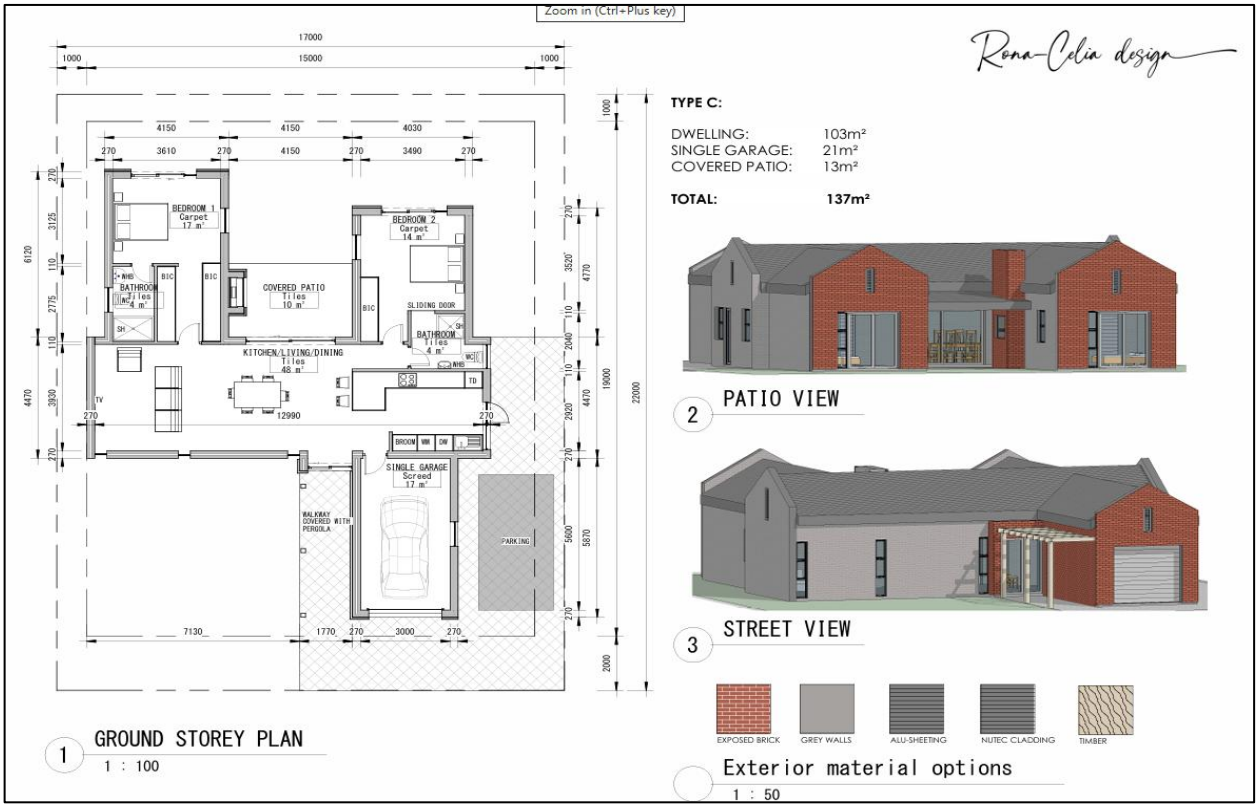

Figure 9: Architectural illustrations of housing typology C

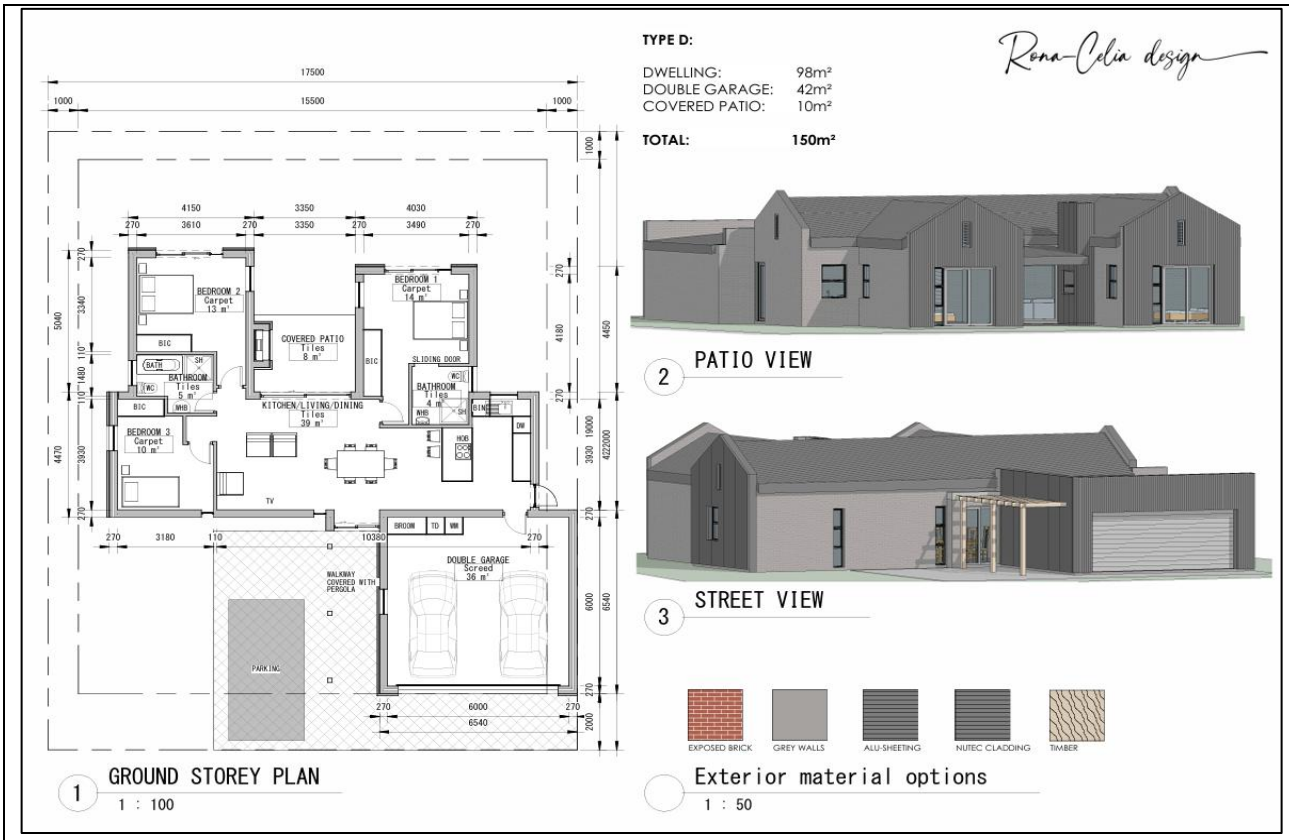

Figure 10: Architectural illustration of housing typology type D

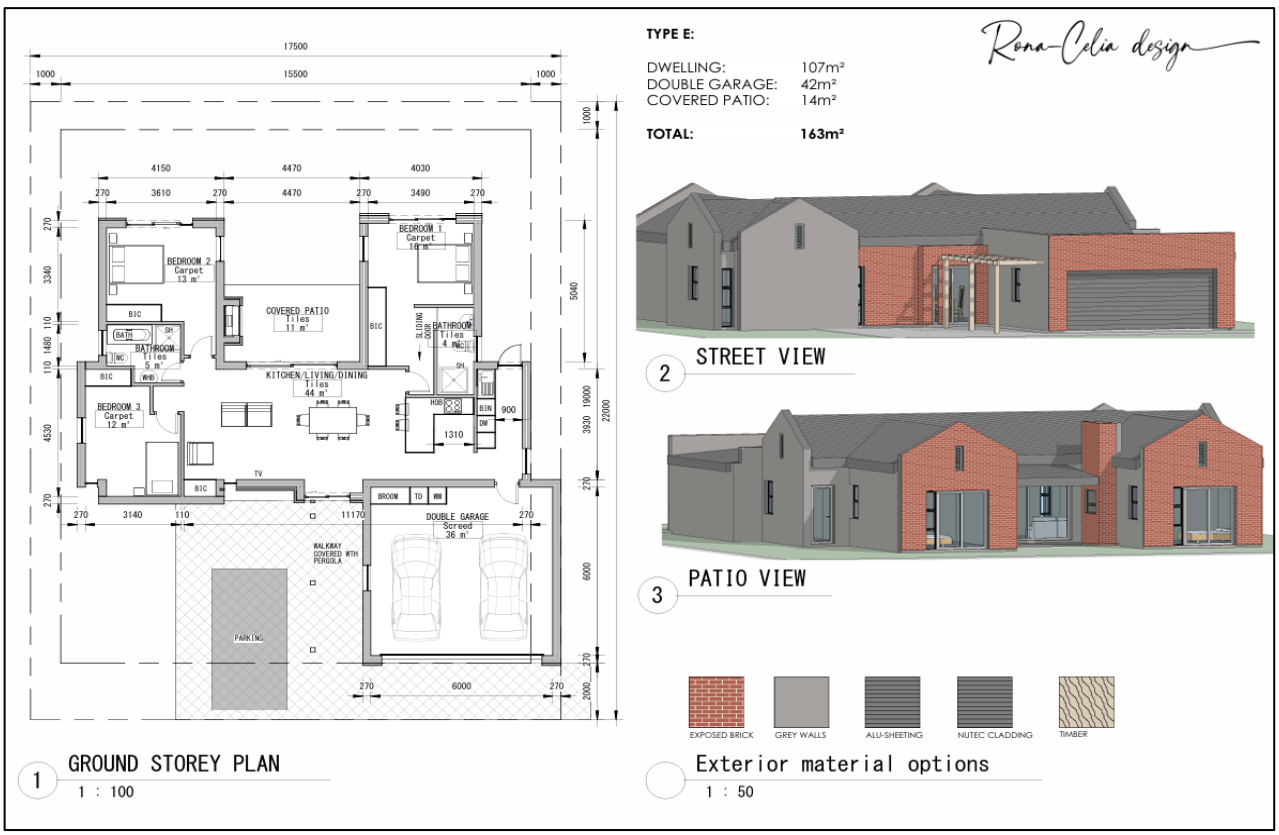

Figure 11: Architectural illustration of housing typology type E.

According to the updated Traffic impact statement in respect of the proposed residential development on Portion 29 of Farm Rheeboksfontein 142 and portion 1 of farm rheeboksfontein 331, Mossel Bay (MR344) dated January 2022:

- The site will be developed for residential purposes to include 137 residential dwelling unit within a group housing scheme.
- The site is well served by existing road infrastructure. The site is located in the predominantly residential area of Rheebok within a suburban roadside development environment.
- Historic traffic count information from 2016 for the intersection of the MR344 and Wildeperske Street was used and projected to depict a 2022-year (existing) traffic scenario by using growth factors from the WCG Road Network Information System (RNIS).
- The trip generation for the proposed development is approximately 137 vehicular trips in the weekday AM and PM peak hours. This up 57% on the previous study and the key intersection will continue to operate acceptably.
- The access to the site will be situated on the MR344, approximately 300m west of Wildeperske Street via the existing access to the sewerage pumpstation located on the western boundary of Farm 4/142. The access has adequate site distance in both directions and will have a throat length in excess of 30m (5 vehicles) for stacking purposes and is compliant with the requirements set out in the AMG.

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

The primary access to the development site will be from MR344/R102 by means of the existing access road to Rheebokrif Main Outfall Pump Station (PS). This road will be upgraded to a surfaced road and re-aligned. This is an existing and approved access for the entire residential development.

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	
	Portion 29 of Farm 142 Rheeboksfontein	C05100000000033100001
	Portion 1 of farm 331	C05100000000033100001

4.7.	Coordinates of the proposed site(s) for all alternatives:			
	Latitude (S)	34°	4‘	14.77“
	Longitude (E)	22°	9‘	48.65“

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

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

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

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

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

3. Other legislation

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

- Amended By-Law on Municipal Land Use Planning and Amended Integrated Zoning Scheme By-Law, Extraordinary Provincial Gazette 8179, dated 15 November 2019..
- By-Law relating to Public Nuisances Amendment
    - Consideration towards this this by-law is to be taken when providing mitigation measures aimed at preventing public nuisances. This includes noise, traffic, dust and odour.
- Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013)(SPLUMA)
- Land Use Planning Act, 2014 (Act 3 of 2014) (LUPA)
- National Heritage Resources Act, 1999 (Act 25 of 1999)
- Advertising on Roads and Ribbon Development Act, 1940 (Act 21 of 1940)

4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.

- Western Cape Provincial Spatial Development Framework (WC PSDF)
- Southern Cape Regional Spatial Implementation Framework, 2019 (RSIF)
- Garden Route District Municipality Integrated Development Plan, 2022 (IDP)
- Eden District Spatial Development Framework, 2017 (DSDF)
- Mossel Bay Integrated Development Plan, 2022 to 2027
- Mossel Bay Spatial Development Framework, 2022 (MBSDF)
- Mossel Bay Municipality Zoning Scheme By-Law, 2021

5. Guidelines

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal.

Guidelines	Describe how the proposed development complies with and responds:
Guideline on Public Participation (2013)	Guideline considered in the undertaking of the public participation for the proposed development. All relevant provisions contained in the guideline were adhered to in the basic assessment process as appropriate, except where an exemption/ deviation has been granted by the Competent Authority.
Guideline on Alternatives (2013)	Guideline considered when identifying and evaluating possible alternatives for the proposed development. Alternatives that were considered in the impact assessment process are reported on in this Basic Assessment Report.
Guideline on Need and Desirability (2013)	Guideline considered during the assessment of the Need and Desirability of the proposed development project.
Guideline on Environmental Management Plans (2005)	Guideline considered in the compilation of the EMP attached to this Basic Assessment Report.
Guideline for the Review of Specialist Input into the EIA Process (2005)	Guideline considered during the review and integration of specialist input into this Basic Assessment Report

Integrated Environmental Management Information Series 5: Impact Significance (2002)	Guideline considering during the identification and evaluation of potential impacts associated with the proposed development, and the reporting thereof in this Basic Assessment Report
Integrated Environmental Management Information Series 7: Cumulative Effects Assessment (2004)	Guideline considering during the assessment of the cumulative effect of the identified impacts.
Circular DEADP 0028/2014: One Environmental Management System	Guideline regulating multiple environmental activities under NEMA, including mining related activities.
Guideline for determining the scope of specialist involvement in EIA processes, June 2005.	Guideline considered when determining the scope of specialist involvement for this assessment.
Guideline for involving biodiversity specialists in the EIA process, June 2005.	Guideline considered to guide biodiversity specialist input in this assessment.
Guideline for involving heritage specialists in the EIA process, June 2005.	Guideline considered to guide the heritage specialist input in this assessment.
Guideline for involving visual and aesthetic specialists in the EIA process, June 2005;	Guideline considered to guide the visual and aesthetic specialists' input in this assessment.
Guideline for involving social assessment specialists in the EIA process, February 2007;	Guideline considered to guide the social assessment specialists' input in this assessment.
Guideline for involving economists in the EIA process, June 2005;	Guideline considered to guide the economists' specialists' input in this assessment.
Western Cape Land Use Planning Guidelines — Rural Areas, March 2019;	Guideline considered to guide the
DEA (2017), Guideline on Need and Desirability, Department of Environmental Affairs (DEA), Pretoria, South Africa (ISBN: 978-0-9802694-4-4); and	Guideline considered during the assessment of the Need and Desirability of the proposed development project.

6. Protocols

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form.

Protocols have been promulgated as per the GNR 320, Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes in Terms of Sections 24(5)(A) And (H) and 44 of the National Environmental Management Act, 1998, When Applying for an EA, 25th January 2025.

The following is a summary of the development footprint environmental sensitivities identified by the DEA Screening Tool (see Appendix I).

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Animal Species Theme		X		
Aquatic Biodiversity Theme				X
Archaeological and Cultural Heritage Theme				X
Civil Aviation Theme			X	
Defence Theme				X
Paleontology Theme	X			
Plant Species Theme			X	
Terrestrial Biodiversity Theme	X			

Based on these results, the screening tool recommended the following specialist assessments be conducted:

Landscape/Visual Impact Assessment	Has been conducted. Please refer to Appendix G8
Archaeological and Cultural Heritage Theme	A response was received from Heritage Western Cape, indicating that as it is believed that the proposed development will not impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required. Please refer to Appendix E1.
Palaeontology Impact Assessment	A response was received from Heritage Western Cape, indicating that as it is believed that the proposed development will not impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required. Please refer to Appendix E1
Terrestrial Biodiversity Impact Assessment	According to the recent screening tool, the Terrestrial Biodiversity Theme indicates a very high sensitivity in CBA: Terrestrial and CBA 2: Terrestrial. The Terrestrial Biodiversity study has been undertaken. CapeNature and BGCMA will be included in public participation
Aquatic Biodiversity Impact Assessment	A compliance statement has been undertaken by Dr. JM Dabrowski. Please refer to Appendix G1.
Socio-Economic Assessment	Has been undertaken, please refer to Appendix G9.
Plant Species Assessment	Has been undertaken by an ecological specialist. Please refer to Appendix G3 and G4
Animal Species Assessment	Has been undertaken by an ecological specialist. Please refer to Appendix G2 and G2.

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 1**	Describe the portion of the proposed development to which the applicable listed activity relates.
9	The development of infrastructure exceeding 1 000 metres in length for the bulk transportation of water or storm water— (i) with an internal diameter of 0,36 metres or more; or (ii) with a peak throughput of 120 litres per second or more; excluding where— (a) such infrastructure is for bulk transportation of water or storm water or storm water drainage inside a road reserve or railway line reserve; or (b) where such development will occur within an urban area.	It is not anticipated that infrastructure exceeding this threshold will be required. **Therefore, this activity is not triggered**.

24	The development of a road (i) for which an environmental authorization was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010; or (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres; but excluding a road – (a) which is identified and included in activity 27 in Listing Notice 2 of 2014; (b) where the entire road falls within an urban area; or (c) which is 1 kilometre or shorter	The proposed development includes the construction of an internal private road network. **Therefore, this activity will be triggered.**
27	The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for – (i) The undertaking of a linear activity; or (ii) Maintenance purposes undertaken in accordance with a maintenance management plan.	The proposed development will entail the clearance of an area that is above 1 hectare. **Therefore, this activity will be triggered**.
28	Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; Excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.	The proposed development will result in a portion of the property being changed from agricultural to a transformed area (residential) development and will exceed 5ha in size. **Therefore, this activity will be triggered.**
Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 3**	Describe the portion of the proposed development to which the applicable listed activity relates.
4	The development of a road wider than 4 metres with a reserve less than 13,5 metres. i. Western Cape i. Areas zoned for use as public open space or equivalent zoning; ii. Areas outside urban areas; (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or	The proposed development includes the construction of an internal private road network (with a road reserve of 10m and 16m wide) and indigenous vegetation occurs on site. **Therefore, this activity will be triggered**.

	iii. Inside urban areas: (aa) Areas zoned for conservation use; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority.	
12	The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for Maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.	There will be a permanent Loss of more than 300sqm of Endangered Vegetation of a low/ medium botanical sensitivity. **Therefore, this activity will be triggered.**
Note: • The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted. • Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.		

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

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

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

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

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

The study area (Portion 1 of farm 331 and Portion 4 of farm Rheeboksfontein 142) covers 15.24 hectares. The linear property is situated between the N2 (National Road) and the R102 (Local Road). About 95% of the land is covered by natural vegetation. Transformed areas consist of 4x4 roads and stormwater drainage infrastructure. North of the study area features varied agriculture, including crops, livestock, and horticulture. South of the site is a densely built residential area with a few open spaces containing natural vegetation.

The proposed development will comprise of the following:

• 143 General Residential Zone I erven (average erf size estimate to be 337 m2 approximately 4,6092 ha)
• 1 Utility Zone Sewage Pumpstation erf 144, approximately 708m2
• 1 Utility Zones Electricity substation erf 145, approximately 65m2
• 1 Utility Zones Refuse Collection erf 151, approximately 98m2
• 5 erven Open Space Zone II erven, approximately 2.0572 ha, and
• 1 Open Space Zone III erf zoned as conservation approximately 3.7119 ha
• 1 Transport Zone III erf 152, approximately 1,3831 ha and
• 1 Transport Zone II erf, approximately 3,3905 ha
• Area indicated as pink in the consolidation plan which forms part of the Road Reserve.
• 8m Buffer Area accommodating a 5 m wide berm and a 3 m wide servitude area for sewage pipeline.
• 5.5 m Buffer area accommodating a 2.5m wide strip area and a 3 m wide servitude area for sewage pipeline.

In addition, hereto the following associated infrastructure will be constructed:
• Internal water reticulation network;
• Stormwater drainage structures and stormwater pipelines; and
• Bulk services infrastructure for electricity reticulation, a mini substation and street lighting.

It is proposed that the bulk water and sewer services infrastructure will be completed for the entire development at the commencement of works. After the completion of services, the development will be phased starting from the eastern end towards the entrance to minimize the disturbance of construction vehicles on the roads to be utilized.
The number of phases is currently anticipated to include three phases, although this will be dependent upon sales.

Formal stormwater upgrades will be constructed in line with the phasing of the residential units to ensure that infrastructure is not damaged during subsequent works.

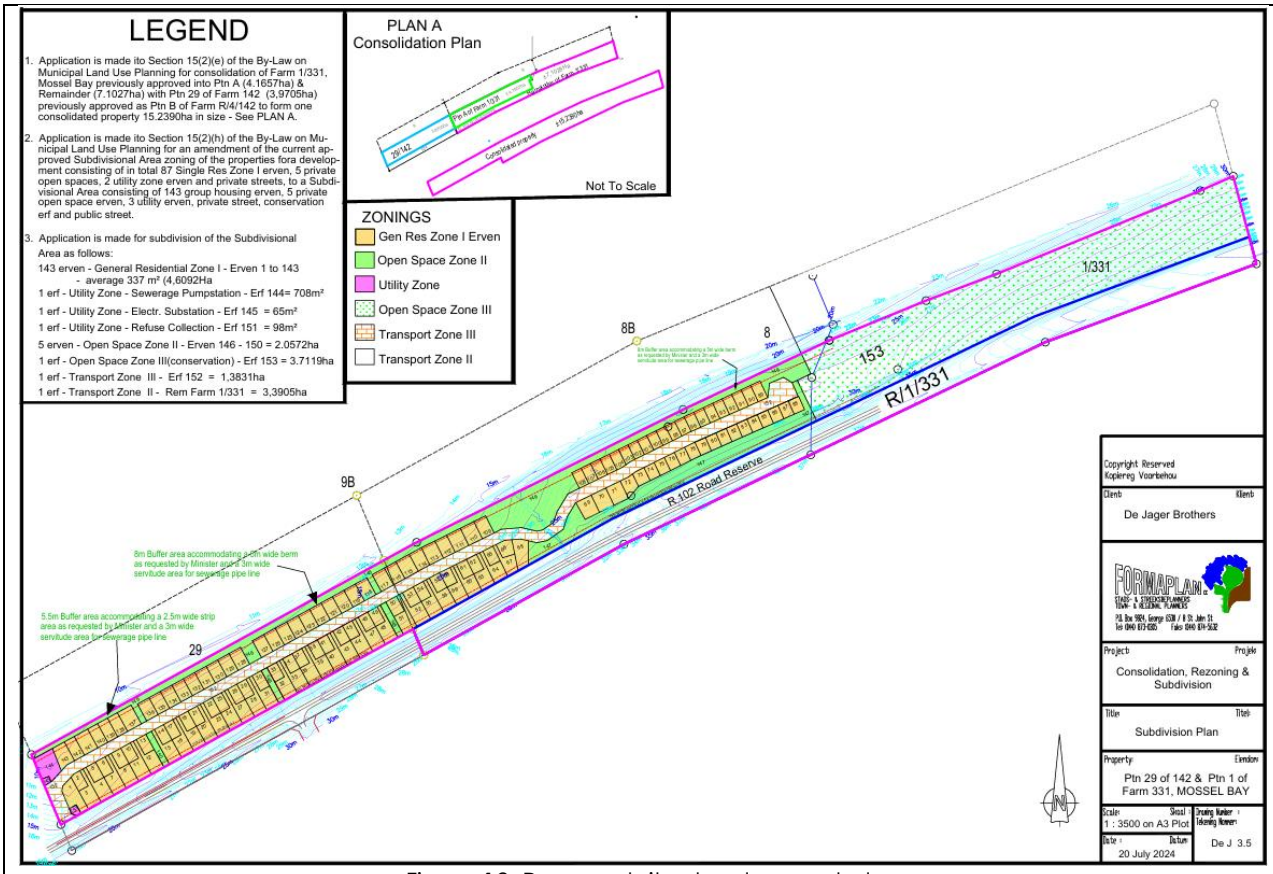

Figure 12: Proposed site development plan

2.	Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21.
A rezoning application will be submitted.	
3.	Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved.
No existing approvals are attached to the properties.	
4.	Explain how the proposed development will be in line with the following?
4.1	The Provincial Spatial Development Framework.

In terms of the WC PSDF, it is indicated that agricultural land must be protected. Although both properties are zoned agricultural zone i, the properties are located within the urban edge of Mossel Bay Municipality and earmarked for development in terms of the proposals contained in the Mossel Bay spatial development framework, 2022.

An agricultural compliance statement, compiled by Johann Lanz of Soilza:

The complied report by the scientist concludes that, the overall conclusion of this assessment is that the proposed development is acceptable because it leads to no loss of existing viable croplands and leads to no loss of future agricultural production potential. The classified land capability of the site ranges from medium to high. However, the classified land capability is due to an H land type.

The H land types comprise grey, regic sands originating from dunes and coastal sands. These land types, because of their unlimited soil depth, are attributed a land capability on the modelled land capability data set, wherever they occur, that is too high (≥8) in relation to their actual cropping potential. In reality, such soils have a low cropping potential due to their very low water and nutrient holding capacity. Evidence of the lack of cropping potential of these land types is that almost no crop production takes place on them. Crop production in the area is confined to land types that have higher water and nutrient holding capacity.

Although there are soil (low water and nutrient holding capacity) constraints on the site's agricultural production potential, its potential to practically deliver agricultural produce is primarily constrained

by other factors. This is primarily because the site is within the Midbrak urban edge and land use planning in the Mosselbay Spatial Development Framework designates the site for non-agricultural use.

For these reasons, the site will never be viably utilised for agricultural production, and its potential is therefore assessed here as non-existent.

This assessment therefore disputes the high sensitivity classification of the site by the screening tool and verifies the entire site as being of medium agricultural sensitivity because of its assessed cropping potential.

The report further explains that an agricultural impact must by definition cause a change to the future agricultural production potential of land. If there is no change, there is no impact. In this case, the entire development footprint is considered to be below the threshold for needing to be conserved as agricultural production land because of the limitations that make it totally unsuitable as viable cropland. The proposed development on this land will therefore result in no loss of future agricultural production potential. The overall negative agricultural impact of the development (loss of future agricultural production potential) is therefore assessed as being of low significance and as acceptable.

It should also be noted that the site is immediately adjacent to urban areas, and it makes sense, from a planning perspective, that the required expansion of urban development occurs across this land.

From an agricultural impact point of view, it is recommended that the proposed development be approved. The conclusion of this assessment on the acceptability of the proposed development and the recommendation for its approval is not subject to any conditions.

Densification:
In terms of the development proposal the property is earmarked for residential development.

In terms of the WC PSDF, higher densities and more compact cities must be created. According to the framework, it is recommended that towns should densify to an average density of 25 units per hectare with development densities of 3 to 6 units per hectare on the edge of a town and densities of between 40 to 60 units per hectare in the core of the urban area.

4.2	The Integrated Development Plan of the local municipality.

In terms of the MBSDF the following land uses are proposed for this node, i.e. Businesses, light industrial uses, mixed-uses and medium density residential development. The proposed development is a residential development, therefor this proposal is in keeping with the proposed land uses.

The development proposed is located within an area that is targeted for urban development in terms of the Mossel Bay Spatial Development Framework, 2022. The application is therefore based on the development proposals as contained in the Mossel Bay Spatial Development Framework, 2022.

4.3.	The Spatial Development Framework of the local municipality.

Based on the local spatial development plan (SDP) and section b of the revised 2022 environmental management framework (emf) the development site has been earmarked for urban expansion, which will make use of underutilised land within the urban edge.

4.4.	The Environmental Management Framework applicable to the area.

No EMF has been adopted by the municipality for the area.

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

No comments have been received from the relevant biodiversity authorities, as of yet.
JA van der Walt (Pr. Sci.Nat) was appointed to conduct a Site Verification and Specialist Environmental Impact Assessment report for the proposed development. Three plants of Species of Conservation Concern (SCC) were recorded on the proposed development footprint: Muraltia knysnaensis EN; Hermannia lavandulifolia VU and Gnidia chrysophylla NT.

The specialist agrees with the medium rating assigned for the plant species by the theme in the environmental screening tool report. The desktop and field surveys identified three plant SCC on the property. All three species have a fairly wide distribution, and the population on the property is mostly small and insignificant in terms of the larger picture. The fact that the property is surrounded on three sides by transformed areas also does not the most threatened species on the property (Muraltia Knysnaensis) which occurs on the eastern section of the property will not be significantly impacted by the proposed development. The specialist is not opposed to the proposed development from a plant species perspective.

The Terrestrial Biodiversity Report compiled by Advanced Environmental Corporation indicated that the sensitivity theme for development property is of Medium and agreed that three SCC were identified on site.

The specialist does not agree with the very high rating assigned for the terrestrial biodiversity Theme in the environmental screening tool report. The specialist rates the terrestrial biodiversity Theme for the property as medium due to the following factors:

1. Isolated and degraded nature of the vegetation.
2. Low number of SCC
3. Further degradation potential of the property due to alien vegetation and access control.
4. Unsuitability of the property for protected area expansion.

The specialist is not opposed to the proposed development from a terrestrial biodiversity perspective if all the mitigation measures are implemented.

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

According to the Terrestrial Biodiversity report:

Critical Biodiversity Areas (CBAs) are regions that must be protected in their natural or near natural state because they are vital for conserving biodiversity and maintaining ecosystem functions. The spatial planning map for the property (Figure 13) shows that about 90% of the property is designated as CBAs. There are two types of CBAs: CBA 1 and CBA 2. CBA 1 mainly consists of pristine vegetation, while CBA 2 indicates some level of vegetation degradation. No Ecological Support Areas (ESAs) are mapped on the property. ESAs, which are not essential for meeting biodiversity targets but support the functioning of protected areas or critical biodiversity areas, are often important for providing ecosystem services. The 2023 Western Cape Biodiversity Spatial Plan (WC BSP) was officially adopted into law on December 13, 2024 (Gazette Extraordinary 9017), aligning with the Western Cape Biodiversity Act (No. 6 of 2021). This officially replaces the 2017 WC BSP with the 2023 version. The only areas on the property not mapped as CBAs are roads.

Figure 13: Western Cape Biodiversity Spatial Plan Map for the property

Reasons for CBA status on the property

The Biodiversity Spatial Plan (2017) for the Western Cape provides reasons for the inclusion of areas into CBAs. These reasons for the CBAs on the property are summarized in Table 4. Most of the natural vegetation on the property (95%) is mapped as CBA 1, while the remaining natural areas are mapped as CBA 2. This is most likely due to the areas degraded by alien vegetation and/or sandmining.

Table 1: Reasons for the inclusion of CBAs on the property

Summary 1:	SA Vegetation Type (2.73), Threatened SA Vegetation Type (0.17), Threatened Vertebrate (7.87)
Feature 1:	Bontebok Extended Distribution Range
Feature 2:	Canca Limestone Fynbos (LT)
Feature 3:	Eastern Fynbos Renosterveld Granite Fynbos Channelled Valley Bottom Wetland
Feature 4:	Groot Brak Dune Strandveld (EN)
Feature 5:	Watercourse protection- Southern Coastal Belt

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

The site will have no influence in an ICMA zone; therefore, alignment will not be necessary.

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

The Screening Report has been updated since the original report prepared for the NOI, dated 20th of August 2025. A second report was issued on 10th of March 2026, and no changes were identified between the first and the second reports.

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

The proposed development aligns with the surrounding land uses and will integrate well into the existing urban landscape. Additionally, there is a significant need for developments that generate employment opportunities, as highlighted in the PSDF and MSDF.

The linear property is situated between the N2 (national road) and the R102 (provincial road). The development that is proposed will create and promote an environment conducive to multiple

industries and exchange of possible socio-economic opportunities for escalation to the greater community of Mossel Bay.	
10.	Explain how the proposed development will optimise the use of existing resources and infrastructure.
The proposed residential development will optimise the use of existing resources and infrastructure by improving the demand for existing local businesses and services and encourage investment in already established commercial areas. Connecting to established municipal services, making efficient use of existing road networks and social facilities and promoting densification within serviced areas.	
11.	Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16).
Confirmation of all services will be included in the Final BAR.	
12.	In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K.
In terms of the DEA's integrated Environmental Management Guideline on Need and Desirability (March 2013), a proposed development is considered justified when it addresses a clearly identified need and is desirable in its specific location and context. The evaluation ensures that development supports socio economic growth while promoting environmental sustainability and responsible land-use planning, consistent with the principles of NEMA.	

SECTION F: PUBLIC PARTICIPATION

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

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

This is not a linear activity.

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

This will be included in the Final BAR.

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

The following State Departments and Organs of State will be included in the Public Participation:

STATE DEPARTMENTS	
AUTHORITIES	**NAME**
Eskom: Land Development	Mr O Peters
Western Cape Government: Department of Environmental Affairs and Development Planning - Development Management (Region 3)	Mr G Benjamin
DEA&DP: Pollution Management	Ms. A McClelland
Breede-Gouritz Catchment Management Agency	Mr C Abrahams
DAFF	Innocent Mapokgole

Western Cape Government: Department of Transport and Public Works	Mr J Prodehl
Western Cape Government: Department of Agriculture	Mr C van der Walt
Heritage Western Cape	Ms W Dhansay
Western Cape Government: Department of Infrastructure	Vanessa Stoffels
Department of Health	Nathan Jacobs
ORGANS OF STATE	**CONTACT PERSON**
CapeNature	Mr C Fordham Ms M Simons
South African Civil Aviation Authority	Ms L Stroh Ms E Shogola
Garden Route District Municipality Executive Manager: Community Services	Mr C Africa
Garden Route District Municipality Executive Manager: Planning and Economic Development	Mr L Menze
Garden Route District Municipality: Environmental Management, Climate Change and Mitigation	Dr. N Viljoen
Mossel Bay Municipality: Infrastructure services	Mr D Naidoo
Mossel Bay Municipality: Community services	Ms E Nel
Mossel Bay Municipality: Water and Sanitation	Mr. E Louw
Mossel Bay Heritage Association	Ms R De Kock
Ward Councillor - Ward 4	Mr A. Janse van Rensburg
Mossel Bay Municipality	Jaco Roux
Mossel Bay Municipality	Colin Puren

4. If any of the State Departments and Organs of State were not consulted, indicate which and why.

Only relevant state departments will be consulted.

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

This will be included in the Final BAR.

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

This will be included in the final BAR.

Note:

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

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

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

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

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

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

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

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. Groundwater

1.1.	Was a specialist study conducted?	YES	NO
1.2.	Provide the name and or company who conducted the specialist study.		
No specialist was appointed to undertake a groundwater study.			
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
The property falls within Primary Catchment K (Kromme) area and in quaternary catchment K10F. According to geospatial data sources, no watercourses are present, adjacent to or within the property boundaries. No aquatic features have been included in the Western Cape Biodiversity Spatial Plan (WCBSP) covering the property. A terrestrial Critical Biodiversity Area 1 (CBA 1 - terrestrial) is mapped to extend across the entire property, with some small areas mapped as terrestrial Critical Biodiversity Area 2 (CBA 2 - terrestrial).			
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.		
The proposed site is located inland of the coastal dunes at Reebok. The area is generally flat with a slight north-to-south aspect. The highest elevation on the property is at 33 metres above sea level (MASL), while the lowest point is at 8 MASL. The proposed site is covered by deep sand with no exposed bedrock.			

2. Surface water

2.1.	Was a specialist study conducted?	YES	NO
2.2.	Provide the name and/or company who conducted the specialist study.		
The study was conducted by Dr. JM Dabrowski of Confluent Environmental Pty (Ltd).			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		
The property falls within Primary Catchment K (Kromme) area and in quaternary catchment K10F. According to geospatial data sources, no watercourses are present, adjacent to or within the property boundaries. No aquatic features have been included in the Western Cape Biodiversity Spatial Plan (WCBSP) covering the property. A terrestrial Critical Biodiversity Area 1 (CBA 1 - terrestrial) is mapped to extend across the entire property, with some small areas mapped as terrestrial Critical Biodiversity Area 2 (CBA 2 - terrestrial). The site visit was conducted on the 7th of November 2025 by Dr Dabrowski, during which time the entire extent of the proposed development footprint was traversed on foot. The terrain of the property is relatively flat, with the eastern side sloping gently towards the north. A relatively steep slope is present along the southern boundary of the property, sloping down from the R102 towards the property (northwards). The soil on the property is very sandy (Figure 14: A) and does not show any signs of water retention. The property was largely covered by indigenous vegetation with some invasives that included, but were not limited to, Rooikraans (Acacia cyclops; Figure 14: B) and Goosefoot		

(Chenopodium sp). The vegetation on the property is Thicket, and includes, but is not limited to; Searsia lucida, Carpobrotus sp., Sideroxylon inerme (milkwood tree), Pittosporum viridiflorum (Cape Cheesewood), Grewia occidentalis, Osteospermum moniliferum, and Helichrysum patulum (Figure 14: C). A noticeable vegetation change occurs in the approximate centre of the property, with this section being dominated by Thamnochortus sp. for approximately 436 m, before changing back to the previously described vegetation characteristic. No hydro-geomorphological landscape features (depressions, confined valleys, channels etc.) indicating the presence of a watercourse (i.e. stream, river or wetland) are present within or near the property.

The report stipulates that, stormwater management is an aspect that must be carefully considered, as there is a large, eroded section present in the centre of the SDP, visible from satellite imagery and confirmed during the site visit (Figure 14: D and E). It was apparent that efforts were made to address the problem by building a sandbag wall on the south (upslope) and north (downslope) of the property and filling in the eroded area. However, prominent erosion is present, cutting underneath and existing concrete channel on either side of the downslope point of the eroded area, adjacent to the N2. This erosion is most likely caused by stormwater from the R102 that discharges onto the property. It should be noted that multiple culverts from the R102 and the developed area south of the property discharge onto the property (Figure 14: F).

In terms of legislation pertaining to the NWA, the property falls outside of the regulated area of any nearby watercourses (i.e., greater than 100 m and 500 m away from a river/stream and natural wetland, respectively).

Figure 14: Photographs of the property, including very sandy soil on the property (A), Rooikraans present on the property (B), vegetation on the property (C), upslope of erosion area (D), erosion still present and expanding, downslope of erosion area (E) and a culvert draining onto the property (F).

3. Coastal Environment

3.1.	Was a specialist study conducted?	YES	NO
3.2.	Provide the name and/or company who conducted the specialist study.		
No specialist was appointed to undertake coastal study.			
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
Proposed site is not within a coastal property.			
3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.		

	The proposed development will have no impact on an estuary.
3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.

4. Biodiversity

4.1.	Were specialist studies conducted?	YES	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		
Terrestrial Biodiversity study was conducted by JA van der Walt from Advanced Environmental Corporation.			
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		

The Western Cape Biodiversity Spatial Plan (WCBSP), VEGMAP SANBI 2018, IUCN. 2021. The IUCN Red List of Threatened Species. Version 2021-3, National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Publication of lists of critically endangered, endangered, vulnerable and protected species, Government Notice No. 2007 (Gazetted 14 December 2007). Some of the systematic conservation planning and biodiversity informants used when compiling their reports at the desktop level.

According to the terrestrial biodiversity report by Advanced Environmental Corporation:
The specialist does not agree with the very high rating assigned for the terrestrial biodiversity theme in the Environmental Screening Tool report. The specialist rates the terrestrial biodiversity theme for the property as medium due to the following factors:
1. Isolated and degraded nature of the vegetation.
2. Low number of SCC.
3. Further degradation potential of the property due to alien vegetation and access control.
4. Unsuitability of the property for protected area expansion.

The specialist is not opposed to the proposed development from a terrestrial biodiversity perspective if all the mitigation measures are implemented.

The Western Cape Biodiversity Spatial Plan (WCBSP), 2018 identifies the vegetation type of the site as Hartenbos Dune Thicket. (Vegetation map, figure 15)

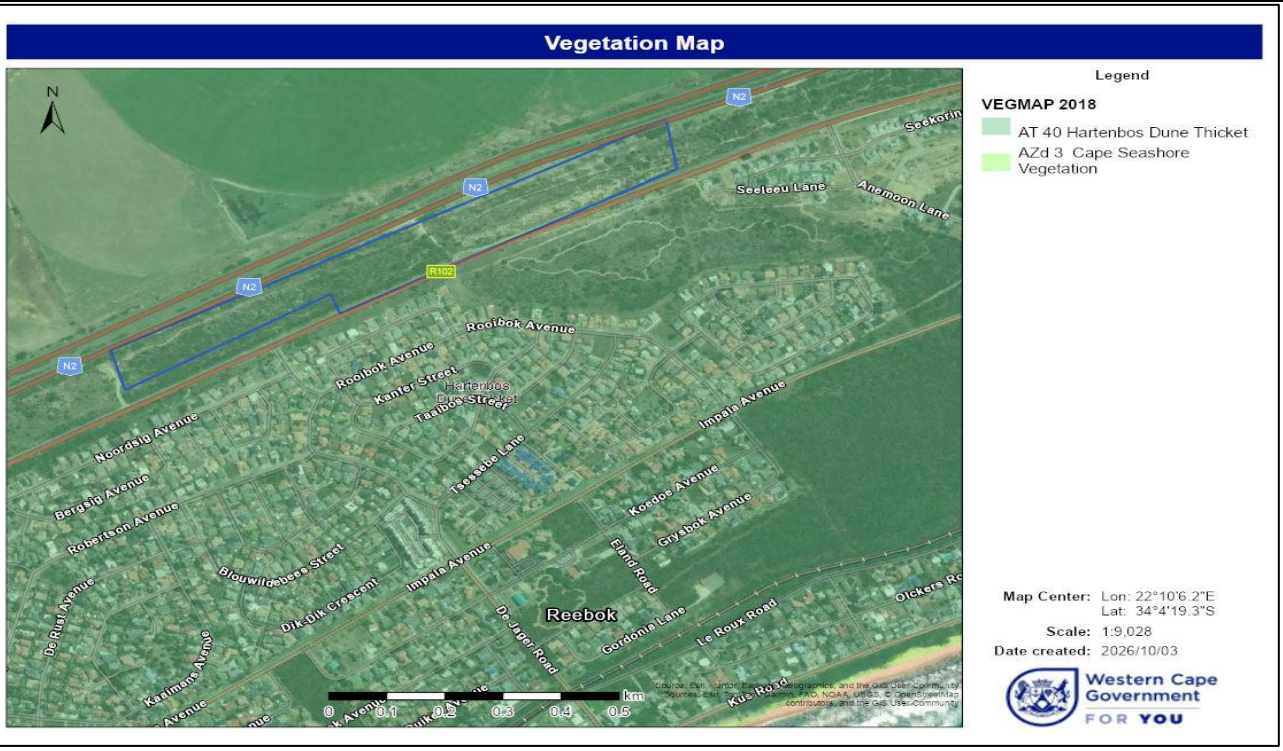

Figure 15: Vegetation type across the study area (VEGMAP, SANBI 2018; Blue polygon = Study area; map generated in Cape Farm Mapper version 3, Western Cape Department of Agriculture).

Land cover within the study area comprises of contiguous low forest & thicket, dense forest & woodland and low shrubland (fynbos) along the northern margin (Land Cover 73 class, Department of Environmental Affairs, 2022; Figure 16). Overall, these designations of land cover were found to accurately reflect the habitat conditions on the site.

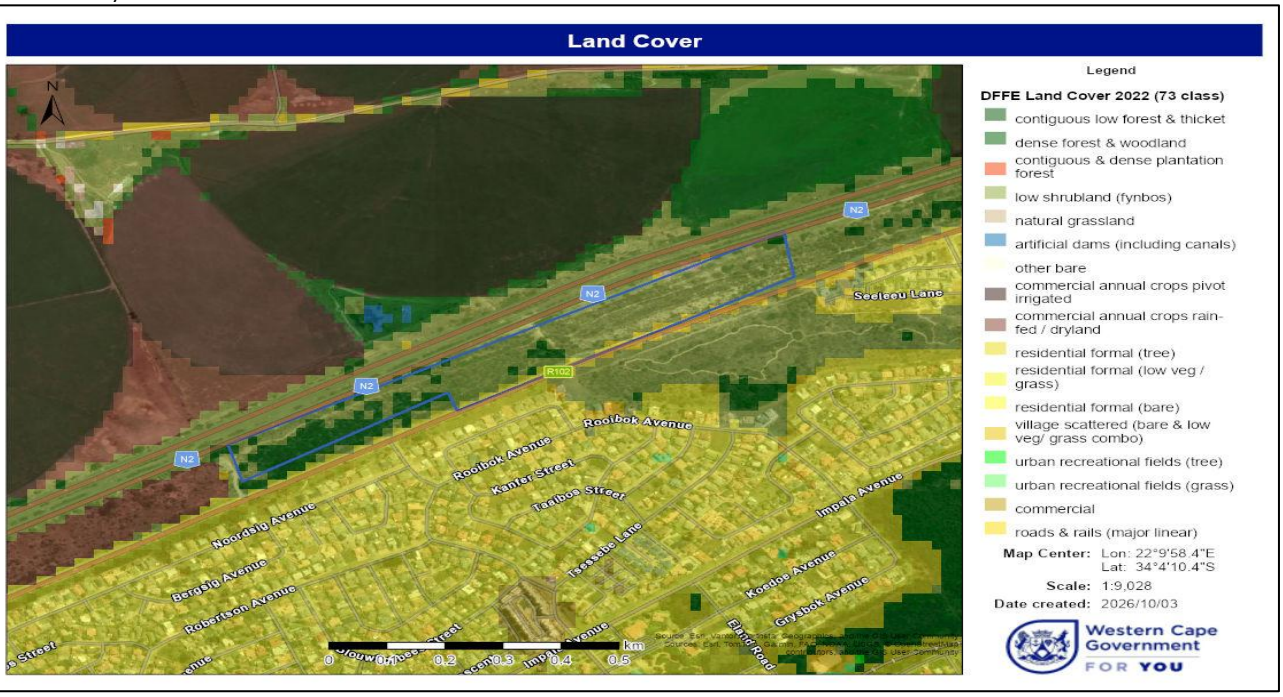

Figure 16: Land cover (Land Cover 73-class, Department of Environmental Affairs, 2022) within the study area (Blue polygon = Study area; information sourced from Cape Farm Mapper version 3, Western Cape Department of Agriculture).

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

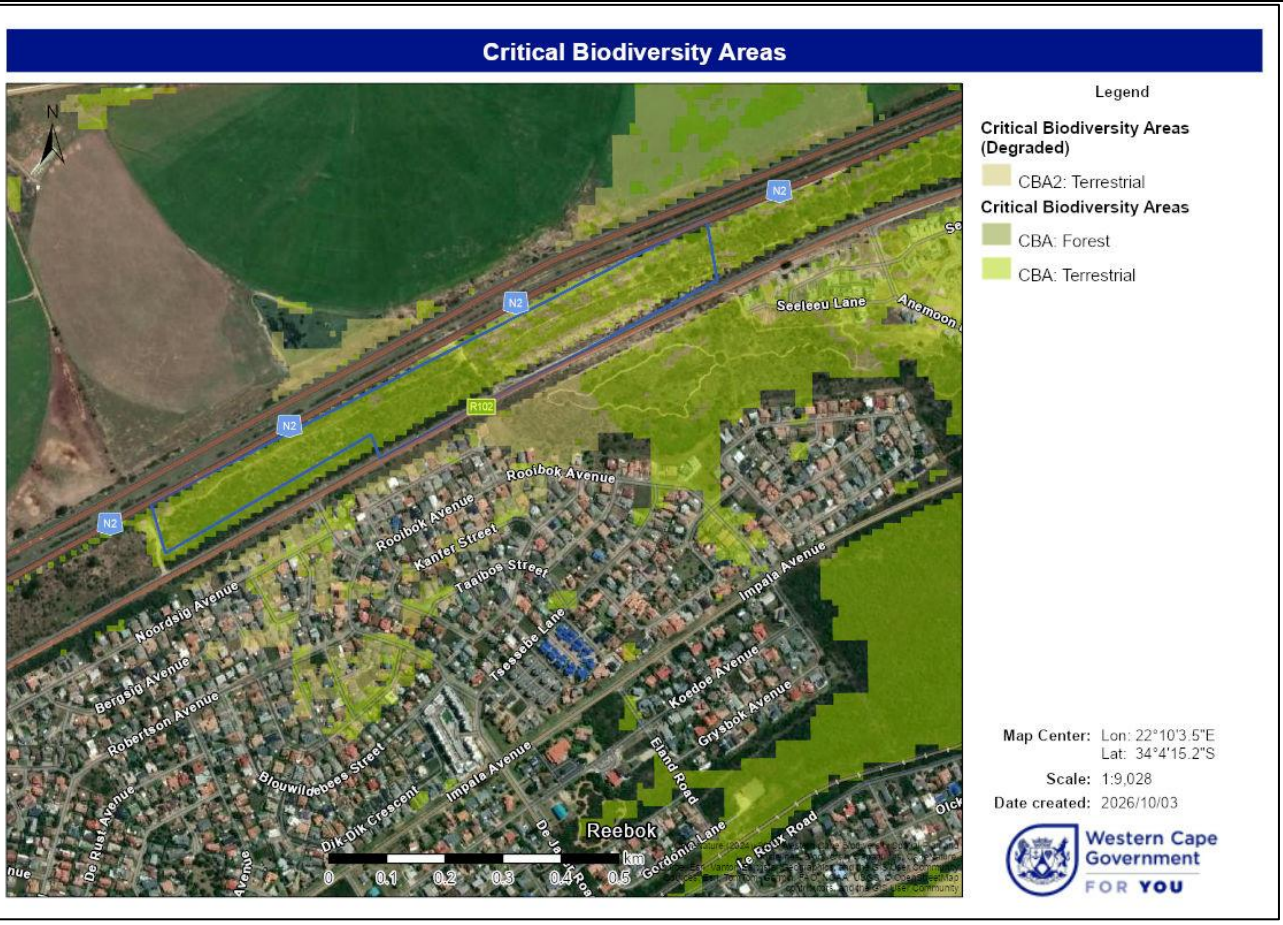

Figure 17: Spatial locations of Critical Biodiversity Areas (CBAs) overlapping with the study area (Blue polygon = Study area; information sourced from Cape Farm Mapper version 3, Western Cape Department of Agriculture).

Critical Biodiversity Areas (CBAs) are regions that must be protected in their natural or near natural state because they are vital for conserving biodiversity and maintaining ecosystem functions. The critical biodiversity map for the property (Figure 17) shows that about 90% of the property is designated as CBAs. There are two types of CBAs: CBA 1 and CBA 2. CBA 1 mainly consists of pristine vegetation, while CBA 2 indicates some level of vegetation degradation.

The Biodiversity Spatial Plan (2017) for the Western Cape provides reasons for the inclusion of areas into CBAs. These reasons for the CBAs on the property are summarized in Table 2. Most of the natural vegetation on the property (95%) is mapped as CBA 1, while the remaining natural areas are mapped as CBA 2. This is most likely due to the areas degraded by alien vegetation and/or sandmining.

Table 2: Reasons for the inclusion of CBAs on the property

Summary 1:	SA Vegetation Type (2.73), Threatened SA Vegetation Type (0.17), Threatened Vertebrate (7.87)
Feature 1:	Bontebok Extended Distribution Range
Feature 2:	Canca Limestone Fynbos (LT)
Feature 3:	Eastern Fynbos Renosterveld Granite Fynbos Channelled Valley Bottom Wetland
Feature 4:	Groot Brak Dune Strandveld (EN)
Feature 5:	Watercourse protection- Southern Coastal Belt

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

The current impacts within the study area include the following:

- 4x4 tracks

- Stormwater control management structures
- Alien vegetation clearing
- Sand mining
- Flood damage repairs
- Loss of 9,47 ha of a threatened habitat (Hartenbos Dune Thicket EN)
- Loss of 9,47 ha of Critical Biodiversity Area
- The animal diversity will decline on the property due to the ongoing invasion of alien vegetation.

According to the terrestrial biodiversity assessment report:

Critical Biodiversity Areas (CBAs) are regions that must be protected in their natural or near-natural state because they are vital for conserving biodiversity and maintaining ecosystem functions. The spatial planning map for the property (Figure 9) shows that about 90% of the property is designated as CBAs. There are two types of CBAs: CBA 1 and CBA 2. CBA 1 mainly consists of pristine vegetation, while CBA 2 indicates some level of vegetation degradation.
No Ecological Support Areas (ESAs) are mapped on the property. ESAs, which are not essential for meeting biodiversity targets but support the functioning of protected areas or critical biodiversity areas, are often important for providing ecosystem services. The 2023 Western Cape Biodiversity Spatial Plan (WC BSP) was officially adopted into law on December 13, 2024 (Gazette Extraordinary 9017), aligning with the Western Cape Biodiversity Act (No. 6 of 2021). This officially replaces the 2017 WC BSP with the 2023 version.
The only areas on the property not mapped as CBAs are roads.

According the aquatic biodiversity assessment compliance statement:

No aquatic features have been included in the Western Cape Biodiversity Spatial Plan (WCBSP) covering the property.

4.6.	If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.

Not applicable. There are no statutorily protected areas near the property.

4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.

According to the Animal Species Site Verification and Compliance Statement (Advanced Environmental Corporation):

The site sensitivity is verified to be Low from an animal species perspective and not High as rated in the Environmental Screening Tool report.

- The animal SCC listed in the environmental screening tool report does not occur on or near the property. The habitat is not available on the property and is outside their natural distribution range. The property is also relatively small and isolated between major roads and urban areas.
- No animal SCC observed and listed on all the other platforms (iNaturalist, SABAP2, VM) has been recorded on the property, and in all cases, the habitat is not suited for these species.
- The specialist did not observe any animal SCC (sightings, spoor, droppings) during the two-day field survey.
- The animal diversity will decline on the property due to the ongoing invasion of alien vegetation.

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.

The study area is located inland of the coastal dunes at Reebok. The area is generally flat with a slight north-to-south aspect, as indicated in Figure 18. The highest elevation on the property is at 33 metres above sea level (MASL), while the lowest point is at 8 MASL. The study area is covered by deep sand with no exposed bedrock.

Figure 18: 5m contours on the proposed site

6. Heritage Resources

6.1.	Was a specialist study conducted?	YES	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
Jonathan Kaplan (Agency for Cultural Resource Management)			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
	A NID was compiled by Jonathan Kaplan of Agency for Cultural Resource Management and issued to Heritage Western Cape. On the 21st of August 2024, it was confirmed via the Case Officer, Ms Chiara Singh, that the case number: HWC24052215CSI0524, was discussed at the Heritage Officers meeting held on 19 July 2024. It was concluded that, since there is no reason to believe that the proposed densification to develop 143 general residential zone 1 erven and additional infrastructure on Portion 29 of Farm Rheeboksfontein 142 (previously a portion of Portion 4), as well as Portion 1 of Farm 331 Rheeboksfontein, Mossel Bay, will impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required. HWC chance finds procedure to be included in the environmental authorization. However, should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and Heritage Western Cape must be notified without delay. The Heritage Western Cape Fossil finds procedure to be included in environmental authorization. Therefore, the area doesn't contain any visible sensitive heritage resources, that could have an influence on the development.		

7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.
A NID was compiled by Jonathan Kaplan of Agency for Cultural Resource Management and issued to Heritage Western Cape. On the 21st of August 2024, it was confirmed via the Case Officer, Ms Chiara Singh, that the case number: HWC24052215CSI0524, was discussed at the Heritage Officers meeting held on 19 July 2024. It was concluded that, since there is no reason to believe that the proposed densification to develop 143 general residential zone 1 erven and additional infrastructure on Portion 29 of Farm Rheeboksfontein 142 (previously a portion of Portion 4), as well as Portion 1 of Farm 331 Rheeboksfontein, Mossel Bay, will impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required. HWC chance finds procedure to be included in the environmental authorization. However, should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and Heritage Western Cape must be notified without delay. The Heritage Western Cape Fossil finds procedure to be included in environmental authorization. Therefore, the area doesn't contain any visible sensitive heritage resources, that could have an influence on the development.

8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.
	The proposed site lies within the Mid-Brak / Great Brak River area, which forms part of the Mossel Bay Local Municipality in the Western Cape province of South Africa. The municipal area includes several coastal towns. The community surrounding Portion 1 of Farm 331 and Portion 4 of Farm Rheeboksfontein 142 is characterised by a semi-urban coastal settlement with mixed socio-economic conditions. The area has a growing population and benefits from tourism, agriculture, and service-sector employment, while some residents face challenges related to unemployment, poverty, and housing needs. Overall, the socio-economic environment reflects a developing coastal community within the Mossel Bay municipal area, where ongoing residential development and infrastructure investment are important for supporting population growth, economic development, and improved living conditions.
8.2.	Explain the socio-economic value/contribution of the proposed development.

The proposed residential development on Portion 1 of Farm 331 and Portion 4 of Farm Rheeboksfontein 142 has the potential to make a significant socio-economic contribution to the Mossel Bay municipal area.

In alignment with the priorities of the Mossel Bay Integrated Development Plan, the project can:

- Address housing demand and reduce the housing backlog
- Generate employment and stimulate local economic activity
- Support population growth
- Encourage infrastructure development and improved service delivery
- Promote spatial integration and sustainable urban development
- Increase municipal revenue and financial sustainability
- Improve the quality of life for residents.

Overall, such a development supports the municipality's strategic vision of creating sustainable, inclusive, and economically viable human settlements.

8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.

The developer aims to create employment opportunities for unskilled, semi-skilled, and skilled individuals from historically disadvantaged communities. Employees will also receive training while working at the facility, which will promote the transfer of skills and the development of knowledge. The proposed development further aims to expand the economic benefits associated with employment within the local community. Income earned from employment can significantly improve the living conditions of previously unemployed households, enabling families to enhance their quality of life.

Furthermore, additional rates and taxes will be generated to the Mossel Bay Municipality accompanied by the provision of additional service infrastructure.

8.4.	Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development.

The proposed development is directly aligned with Section 26(1) of the Constitution which states that "Everyone shall have the right of access to adequate housing", as it has been identified that there is a high demand for housing.

According to the Visual Resource Management Africa cc Environmental Impact Statement:

The report stipulates that, the increased number of units would effectively reduce the space available for garden trees, effectively resulting in much higher potential for visual intrusion that would degrade the adjacent N2 and Reebok urban area's sense of place. The proposed landscape change would result in a strong ribbon development effect along this portion of the N2, as well as result in strong levels of visual intrusion of skyline development from structures located on the eastern 'cut platform' that is elevated above the N2 receptors. While a detailed visual impact assessment has not be undertaken, the following preliminary mitigations were proposed to ensure that the objectives of "sense of place sensitive" development would take place:

1. Break the long linear development by the creation of a visual buffer in the central area where indigenous trees regrowth within the Albany Thicket vegetation is taking place. This would allow for the creation of a connective visual corridor from the N2 to the southeast to the Private Open Space located east of Reebok. This area should be zoned Open Space and managed as a rehabilitation/ natural area and to assist with the erosional problem that is taking place in the drainage line that often results in washing of sand onto the N2 Highway.
2. Due to the increased number of units on the cut platform in the east of the study area, there is potential that the earthworks will cut into the steep cut face of the old sand dune excavation. This has the potential to destabilise this dune wall and should be excluded from development.
3. Due to the increased number of units in the cut platform in the east portion of the study area, the structures will be pushed forward resulting in the generation of stronger levels of visual contrast from skyline intrusion with limited visual screening by the proposed berm as seen from the N2 receptors travelling eastbound.

The above recommendations were incorporated into the final site development plan. With these mitigations, the western development areas in front of the Reebok urban areas would read as a continuation of the existing urban sense of place, with a 100m buffer area between the eastern section of the development. This buffer area would be used to manage the stormwater run-off via a large underground pipe and allow for a continuation of the indigenous trees growth that is taking place along this drainage line. The wrapping of the screening berm around the eastern raised development platform, would also reduce the visual intrusion of the houses on this portion of the development area in both the east and west views from the N2 Highway receptors.

The restoration and rehabilitation of the central area would break up the linear, ribbon development effect, allowing for a continuation of the visual corridor link to the existing Private Open Space located to the southwest of the property. With these mitigations, the required "sense of place sensitive" development objective of the Mossel Bay SDF would be achieved. The finding of the visual assessment is that the proposed development with the above-mentioned mitigations, would be visually preferred over the previous medium density, strip development and should be authorised.

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. Details of the alternatives identified and considered

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

Provide a description of the preferred property and site site alternative.

The Proposed Mid-Brak residential development is located on portion 29 (previously a portion of portion 4) of farm Rheeboksfontein, no 142, as well as portion 1 of farm 331 Rheeboksfontein, in Mossel Bay.

The proposed development is located to the north of the existing Reebok residential area, between a small strip of land located within the R102 District Road and the N2 National Highway.

Access to the property would be via the R102.

Figure 19: Preferred site

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

No site alternatives were considered.

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

Not applicable.

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

Not applicable.

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

The Applicant would like to develop his properties in accordance with the proposed layout.

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

Positive impacts on the environment:

- Economic development
- Improved infrastructure
- Development of highly disturbed land
- Development within the urban area
- No rivers on or near site

Negative impacts on the environment:

- Pressure on natural resources
- Loss of natural vegetation
- Disturbance to wildlife habitats
- Development of disturbed greenfield site

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

Provide a description of the preferred activity alternative.

Provide a description of any other activity alternatives investigated.

Provide a motivation for the preferred activity alternative.

Provide a detailed motivation if no activity alternatives exist.

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

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

Provide a description of the preferred design or layout alternative.

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

Provide a motivation for the preferred design or layout alternative.

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

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

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

Provide a description of the preferred technology alternative:

Provide a description of any other technology alternatives investigated.

Provide a motivation for the preferred technology alternative.

Provide a detailed motivation if no alternatives exist.

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

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

Provide a description of the preferred operational alternative.

Provide a description of any other operational alternatives investigated.

Provide a motivation for the preferred operational alternative.

Provide a detailed motivation if no alternatives exist.	
List the positive and negative impacts that the operational alternatives will have on the environment.	
1.6.	The option of not implementing the activity (the 'No-Go' Option).
Provide an explanation as to why the 'No-Go' Option is not preferred.	
The no-go option will indicate that the status quo will persist and prevent potential environmental disturbances that may result from the proposed development. Consequently, this option represents the environmentally conservative approach.	
1.7.	Provide and explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.
1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.

2. "No-Go" areas

Explain what "no-go" area(s) have been identified during identification of the alternatives and provide the co-ordinates of the "no-go" area(s).
No formal no-go areas have been identified for the proposed development. However, all areas outside of the working corridor and development footprint will be considered "No-Go" areas. The specialist findings indicate varying levels of sensitivity across the site that should inform planning and mitigation measures. The threatened plant species sensitivity map (Figure 20) was compiled based on the distribution, abundance, and conservation status of species of conservation concern (SOCC). The unshaded areas are considered to have medium sensitivity in relation to plant SOCC. A population of Muraltia knysnaensis (Endangered) occurs in the eastern section of the property and is regarded as viable; this area is therefore assigned a high sensitivity rating. In contrast, the other two plant species of conservation concern are present in very low numbers and are unlikely to persist in the long term. The areas designated for roads, electrical infrastructure, and stormwater management are classified as low sensitivity, as no plant SOCC were recorded in these locations. A search and rescue operation will be undertaken for all identified species of conservation concern (SCCs) prior to the commencement of construction activities, where feasible, to ensure their relocation and conservation. These high sensitivity areas will be clearly demarcated on site prior to construction. Following the completion of the search and rescue process, and with appropriate mitigation in place, these areas will not be considered as no-go areas for the development. .

Figure 20: Sensitivity map for the plant Species of Conservation Concern on the property

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

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

The assessment criteria utilised in this report are 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).

Determination of Extent (Scale):

Site specific	On site or within 100 m of the site boundary, but not beyond the property boundaries.
Local	The impacted area includes the whole or a measurable portion of the site and property, but could affect the area surrounding the development, including the neighboring properties and wider municipal area.
Regional	The impact would affect the broader region (e.g., neighboring towns) beyond the boundaries of the adjacent properties.
National	The impact would affect the whole country (if applicable).

Determination of Duration:

Temporary	The impact will be limited to the construction phase.
Short term	The impact will either disappear with mitigation or will be mitigated through a natural process in a period shorter than 8 months after the completion of the construction phase.
Medium term	The impact will last up to the end of the construction phase, where after it will be entirely negated in a period shorter than 3 years after the completion of construction activities.
Long term	The impact will continue for the entire operational lifetime of the development but will be mitigated by direct human action or by natural processes thereafter.
Permanent	This is the only class of impact that will be non-transitory. Such impacts are regarded to be irreversible, irrespective of what mitigation is applied.

Determination of Probability:

Improbable	The possibility of the impact occurring is very low, due to either the circumstances, design, or experience.
Probable	There is a possibility that the impact will occur to the extent that provisions must therefore be made.
Highly probable	It is most likely that the impacts will occur at some stage of development. Plans must be drawn up to mitigate the activity before the activity commences.
Definite	The impact will take place regardless of any prevention plans.

Determination of Significance (without mitigation):

No significance	The impact is not substantial and does not require any mitigation action.
Low	The impact is of little importance but may require limited mitigation.
Medium	The impact is of sufficient importance and is therefore considered to have a negative impact. Mitigation is required to reduce the negative impacts to acceptable levels.

Medium-High	The impact is of high importance and is therefore considered to have a negative impact. Mitigation is required to manage the negative impacts to acceptable levels.
High	The impact is of great importance. Failure to mitigate, to reduce the impact to acceptable levels, could render the entire development option or entire project proposal unacceptable. Mitigation is therefore essential.
Very High	The impact is critical. Mitigation measures cannot reduce the impact to acceptable levels. As such the impact renders the proposal unacceptable.

Determination of Significance (with mitigation):

No significance	The impact will be mitigated to the point where it is regarded to be insubstantial.
Low	The impact will be mitigated to the point where it is of limited importance.
Medium	Notwithstanding the successful implementation of the mitigation measures, the impact will remain of significance. However, taken within the overall context of the project, such a persistent impact does not constitute a fatal flaw.
High	Mitigation of the impact is not possible on a cost-effective basis. The impact continues to be of great importance, and taken within the overall context of the project, is a fatal flaw in the project proposal.

Determination of Reversibility:

Completely Reversible	The impact is reversible with implementation of minor mitigation measures
Partly Reversible	The impact is partly reversible but more intense mitigation measures
Barely Reversible	The impact is unlikely to be reversed even with intense mitigation measures
Irreversible	The impact is irreversible, and no mitigation measures exist

Determination of Degree to which an Impact can be Mitigated:

Can be mitigated	The impact is reversible with implementation of minor mitigation measures
Can be partly mitigated	The impact is partly reversible but more intense mitigation measures
Can be barely mitigated	The impact is unlikely to be reversed even with intense mitigation measures
Not able to mitigate	The impact is irreversible, and no mitigation measures exist

Determination of Loss of Resources:

No loss of resource	The impact will not result in the loss of any resources
Marginal loss of resource	The impact will result in marginal loss of resources
Significant loss of resources	The impact will result in significant loss of resources
Complete loss of resources	The impact will result in a complete loss of all resources

Determination of Cumulative Impact:

Negligible	The impact would result in negligible to no cumulative effects
Low	The impact would result in insignificant cumulative effects
Medium	The impact would result in minor cumulative effects
High	The impact would result in significant cumulative effects

Determination of Consequence significance:

Negligible	The impact would result in negligible to no consequences
Low	The impact would result in insignificant consequences

Medium	The impact would result in minor consequences
High	The impact would result in significant consequences

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

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

DESIGN / CONSTRUCTION PHASE IMPACTS:

Table 3: Impact table for botanical impacts due to the proposed development of 9,47 ha of natural vegetation. Specialist Plant Species Report (Advanced Environmental Corporation).

Alternative:	Alternative A (Option 1) **Clearing of 9,47 ha of vegetation**	Alternative B (Option 2) **No development**
CONSTRUCTION PHASE		
PLANT SPECIES IMPACT ASSESSMENT 1		
Potential impact and risk:	Loss of plant SCC	Loss of plant SCC
Nature of impact:	Impact on plant species of conservation concern: Muraltia knysnaensis EN Hermannia lavandulifolia VU Gnidia chrysophylla NT	Impact on plant species of conservation concern: Muraltia knysnaensis EN Hermannia lavandulifolia VU Gnidia chrysophylla NT
Extent and duration of impact:	Site-specific and long-term	Site-specific and long-term
Consequence of impact or risk:	Medium	Medium
Probability of occurrence:	Probable	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss of resource	No loss
Degree to which the impact can be reversed:	Partly Reversible	No need to reserve
Indirect impacts:	Fire suppression in the long term and the establishment of alien vegetation	SCC could be lost if alien vegetation is not managed
Cumulative impact prior to mitigation:	Medium	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium	Low
Degree to which the impact can be avoided:	Low	High
Degree to which the impact can be managed:	Medium	High
Degree to which the impact can be mitigated:	Medium	High
Proposed mitigation:	1) Removal of alien invasive vegetation in planned open spaces. 2) Access control to open spaces (demarcated paths)	1) Total removal of alien invasive vegetation on the property
Residual impacts:	None	None
Cumulative impact post mitigation:	Low	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-low	High

Table 4: Impact table for the loss of 9,47 ha of a threatened ecosystem. Specialist Terrestrial Biodiversity Report (Advanced Environmental Corporation).

Alternative:	Alternative A (Option 1) **Clearing of 9,47 ha of vegetation**	Alternative B (Option 2) **No development**
CONSTRUCTION PHASE		
Terrestrial Biodiversity Impact Assessment 1		
Potential impact and risk:	Loss of 9,47 ha of a threatened ecosystem.	
Nature of impact:	Permanent loss of 9,47 ha of Hartenbos Dune Thicket (EN)	No impact
Extent and duration of impact:	Permanent	No impact
Consequence of impact or risk:	Medium	No impact
Probability of occurrence:	Definite	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss of resource	No loss
Degree to which the impact can be reversed:	Irreversible	No need to reverse
Indirect impacts:	Marginal loss of an ecological corridor	SCC could be lost if alien vegetation is not managed
Cumulative impact prior to mitigation:	Medium	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium	Low
Degree to which the impact can be avoided:	Low	High
Degree to which the impact can be managed:	Low	High
Degree to which the impact can be mitigated:	Low	High
Proposed mitigation:	1) Removal of alien invasive vegetation in planned open spaces 2) Access control to open spaces (demarcated paths)	1) Total removal of alien invasive vegetation on the property
Residual impacts:	None	None
Cumulative impact post mitigation:	Low	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-low	Low

Table 5: Impact table for the loss of 9,47 ha Critical Biodiversity Area. Specialist Terrestrial Biodiversity Report (Advanced Environmental Corporation).

Alternative:	Alternative A (Option 1) **Clearing of 9,47 ha of vegetation**	Alternative B (Option 2) **No development**
CONSTRUCTION PHASE		
Terrestrial Biodiversity Impact Assessment 2		
Potential impact and risk:	Loss of 9,47 ha CBA	
Nature of impact:	Permanent loss of 9,47 ha of CBA	No impact
Extent and duration of impact:	Permanent	No impact
Consequence of impact or risk:	Medium	No impact
Probability of occurrence:	Definite	Probable

Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss of resource	No loss
Degree to which the impact can be reversed:	Irreversible	No need to reverse
Indirect impacts:	Marginal loss of an ecological corridor	SCC could be lost if alien vegetation is not managed
Cumulative impact prior to mitigation:	Medium	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium	Low
Degree to which the impact can be avoided:	Low	Low
Degree to which the impact can be managed:	Low	High
Degree to which the impact can be mitigated:	Low	High
Proposed mitigation:	1) Removal of alien invasive vegetation in planned open spaces 2) Access control to open spaces (demarcated paths)	1) Total removal of alien invasive vegetation on the property
Residual impacts:	None	None
Cumulative impact post mitigation:	Low	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-low	Low

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

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

The specialist reports do not indicate or adequately assess the potential impacts associated with the proposed development. Furthermore, a risk matrix evaluating the likelihood, significance, and potential consequences of these impacts has not been included, which restricts a comprehensive understanding of the risks related to the proposed development.

Plant Species Site Verification and Specialist Environmental Impact Assessment: JA van der Walt

The specialist agrees with the medium rating assigned for the plant species by the theme in the Environmental Screening Tool report. The desktop and field surveys identified three plant SCC on the property. All three species have a fairly wide distribution, and the population on the property is mostly small and insignificant in terms of the larger picture. The fact that the property is surrounded on three sides by transformed areas also does not have the most threatened species on the property (Muraltia knysnaensis) will not be significantly impacted by the proposed development. The specialist is not opposed to the proposed development from a plant species perspective. A control plan for alien vegetation should be part of the EMPr.

Animal Species Site Verification and Compliance Statement: JA van der Walt

The site sensitivity is verified to be Low from an animal species perspective and not High as rated in the Environmental Screening Tool report. This finding is based on:

- The animal SCC listed in the environmental screening tool report does not occur on or near the property. The habitat is not available on the property and is outside their natural distribution range. The property is also relatively small and isolated between major roads and urban areas.
- No animal SCC observed and listed on all the other platforms (iNaturalist, SABAP2, VM) has been recorded on the property, and in all cases, the habitat is not suited for these species.
- The specialist did not observe any animal SOCC (sightings, spoor, droppings) during the two-day field survey.

- The animal diversity will decline on the property due to the ongoing invasion of alien vegetation.
- The total removal of the alien vegetation should be incorporated into the Environmental Management Plan (EMPr). An alien vegetation control plan should form part of the EMPr.

Aquatic Compliance Statement: Dr. JM Dabrowski

Given the information obtained from the desktop study and the observation during the site visit, the aquatic biodiversity sensitivity is considered to be Low as no watercourse is present on the property. In terms of legislation pertaining to the NWA, the development falls outside of the regulated area of any watercourses (Figure 8) and will therefore not require any water use authorisation in terms of Section 21 (c) and (i) of the NWA.

The steep slopes of the property will be vulnerable to erosion during the clearance of the site and the construction phase. It is therefore important that appropriate erosion control measures are implemented, which include inter alia, the following:

- Ensure that construction activities do not cause any preferential flow paths and concentrated surface runoff during rainfall events.
- Clearly demarcate the construction area and ensure that heavy machinery does not compact soil or disturb vegetation outside of these demarcated areas.
- Reduce transport of sediment through use of structures such as silt fences and biodegradable coir logs placed along a contour below the development footprint.
- Ensure that vegetation clearing is conducted in parallel with the construction progress to minimise erosion and runoff.
- Revegetate exposed areas once construction has been completed.
- Ensure that stormwater and runoff generated by hardened surfaces is discharged in retention areas (i.e. swales or retention ponds), to avoid concentrated runoff and associated erosion.

A key impact related to the development is the generation of large volumes of stormwater associated with an increased area of impermeable surfaces created by the development. Taking the current erosion into account, the addition of harden surfaces on the property will exacerbate the current erosion area as well as create additional erosion areas on the property. It is therefore important that stormwater generated on-site should be managed according to Sustainable Drainage System (SuDS) principles. This requires that as much stormwater as possible should be attenuated within the development footprint. In this respect, the following measures, inter alia, should be considered:

- Rainwater harvesting tanks must be installed where possible;
- Use of swales and detention ponds to attenuate stormwater runoff, encourage infiltration and reduce the speed, energy and volumes at which stormwater is discharged from the;
- Use of permeable paving to encourage infiltration into the soil, if the parking in front of the filling station is to be paved; and
- Use of retention ponds and artificial wetlands to capture stormwater runoff, prevent its discharge from the site and attenuate pollutants.

Terrestrial Biodiversity Site Verification and Specialist Environmental Impact Assessment: JA van der Walt

The specialist does not agree with the very high rating assigned for the terrestrial biodiversity theme in the Environmental Screening Tool report. The specialist rates the terrestrial biodiversity theme for the property as medium due to the following factors:

1. Isolated and degraded nature of the vegetation.
2. Low number of SCC
3. Further degradation potential of the property due to alien vegetation and access control.

4. Unsuitability of the property for protected area expansion.

The specialist is not opposed to the proposed development from a terrestrial biodiversity perspective if all the mitigation measures are implemented. A control plan for alien vegetation in the proposed open spaces should be part of the EMPr.

Site Sensitivity Verification and Agricultural Compliance Statement: Johann Lanz

The overall conclusion of this assessment is that the proposed development is acceptable because it leads to no loss of existing viable croplands and leads to no loss of future agricultural production potential.

The classified land capability of the site ranges from medium to high. However, the classified land capability is due to an H land type. The H land types comprise grey, regic sands originating from dunes and coastal sands. These land types, because of their unlimited soil depth, are attributed a land capability on the modelled land capability data set, wherever they occur, that is too high (≥8) in relation to their actual cropping potential. In reality, such soils have a low cropping potential due to their very low water and nutrient holding capacity. Evidence of the lack of cropping potential of these land types is that almost no crop production takes place on them. Crop production in the area is confined to land types that have higher water and nutrient holding capacity.

Although there are soil (low water and nutrient holding capacity) constraints on the site's agricultural production potential, its potential to practically deliver agricultural produce is primarily constrained by other factors. This is primarily because the site is within the Midbrak urban edge and land use planning in the Mosselbay Spatial Development Framework designates the site for non-agricultural use. For these reasons, the site will never be viably utilised for agricultural production, and its potential is therefore assessed here as non-existent.

This assessment therefore disputes the high sensitivity classification of the site by the screening tool and verifies the entire site as being of medium agricultural sensitivity because of its assessed cropping potential.

An agricultural impact must by definition cause a change to the future agricultural production potential of land. If there is no change, there is no impact. In this case, the entire development footprint is considered to be below the threshold for needing to be conserved as agricultural production land because of the limitations that make it totally unsuitable as viable cropland. The proposed development on this land will therefore result in no loss of future agricultural production potential. The overall negative agricultural impact of the development (loss of future agricultural production potential) is therefore assessed as being of low significance and as acceptable.

It should also be noted that the site is immediately adjacent to urban areas, and it makes sense, from a planning perspective, that the required expansion of urban development occurs across this land.

From an agricultural impact point of view, it is recommended that the proposed development be approved. The conclusion of this assessment on the acceptability of the proposed development and the recommendation for its approval is not subject to any conditions.

Traffic Impact Statement - Mr Hoosain Cassoo

- Access to the site in accordance with the AMP for MR3344/R102 will be positioned opposite Wildeperske Street in Rheebok. The site access road will thus form a fourth leg (minor approach) at this existing T-junction.

- At present there are no public transport services along the MR344/R102. However, in accordance with the Mossel Bay Integrated Public Transport Network Report a bus service will be rolled out in the future and the MR344 has been earmarked as a route and bus stops may be expected within comfortable walking distance from the site.
- The additional traffic generated by the proposed development is expected to have a low impact on the road network during peak hours.
- In terms of the RAG, a dedicated right turn lane on MR344/R102 is required as the PM peak hour volume of vehicles expected to turn right exceeds 30 vehicles. However, the low opposing traffic flow makes it unlikely that a right turn lane would be justified in the foreseeable future.
- The report recommends that the Mossel Bay Municipality and Western Cape Government approve the proposed residential development, since it was found to have a low impact on traffic operations at the key intersection in the study area.

Electrical Tech Report- BDE Consulting Engineers

- Adequate medium voltage capacity exists on the existing overhead lines, to accommodate the two-erven development.
- The development will have a minimal effect on the quality of supply to the existing customers, since the development will be supplied by an underground cable system from the private mini substation.
- The development will have no negative effect on the electrical operating costs of the supply authority, since the complete electrical infrastructure required for the development will be supplied and installed by the Developers. Electricity sales to the new customers will in fact contribute to the profits made by the supply authority.

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

Plant Species Site Verification and Specialist Environmental Impact Assessment: JA van der Walt

- Alien vegetation control plan that should be compiled by an experienced specialist and incorporated into the EMPr.
- The proposed Open Space (Conservation area) should have access control (fencing) to prevent trampling of plant SCC.

Animal Species Site Verification and Compliance Statement: JA van der Walt

The site sensitivity is verified to be Low from an animal species perspective and not High as rated in the Environmental Screening Tool report.

- The total removal of the alien vegetation should be incorporated into the Environmental Management Plan (EMPr). An alien vegetation control plan should form part of the EMPr.

Aquatic Compliance Statement: Dr. JM Dabrowski

Given the information obtained from the desktop study and the observation during the site visit, the aquatic biodiversity sensitivity is considered to be Low as no watercourse is present on the property. In terms of legislation pertaining to the NWA, the development falls outside of the regulated area of any watercourses and will therefore not require any water use authorisation in terms of Section 21 (c) and (i) of the NWA.

The steep slopes of the property will be vulnerable to erosion during the clearance of the site and the construction phase. It is therefore important that appropriate erosion control measures are implemented, which include inter alia, the following:

- Ensure that construction activities do not cause any preferential flow paths and concentrated surface runoff during rainfall events.

- Clearly demarcate the construction area and ensure that heavy machinery does not compact soil or disturb vegetation outside of these demarcated areas.
- Reduce transport of sediment through use of structures such as silt fences and biodegradable coir logs placed along a contour below the development footprint.
- Ensure that vegetation clearing is conducted in parallel with the construction progress to minimise erosion and runoff.
- Revegetate exposed areas once construction has been completed.
- Ensure that stormwater and runoff generated by hardened surfaces is discharged in retention areas (i.e. swales or retention ponds), to avoid concentrated runoff and associated erosion.

A key impact related to the development is the generation of large volumes of stormwater associated with an increased area of impermeable surfaces created by the development. Taking the current erosion into account, the addition of harden surfaces on the property will exacerbate the current erosion area as well as create additional erosion areas on the property. It is therefore important that stormwater generated on-site should be managed according to Sustainable Drainage System (SuDS) principles. This requires that as much stormwater as possible should be attenuated within the development footprint. In this respect, the following measures, inter alia, should be considered:

- Rainwater harvesting tanks must be installed where possible;
- Use of swales and detention ponds to attenuate stormwater runoff, encourage infiltration and reduce the speed, energy and volumes at which stormwater is discharged from the;
- Use of permeable paving to encourage infiltration into the soil, if the parking in front of the filling station is to be paved; and
- Use of retention ponds and artificial wetlands to capture stormwater runoff, prevent its discharge from the site and attenuate pollutants.

Terrestrial Biodiversity Site Verification and Specialist Environmental Impact Assessment: JA van der Walt

The specialist does not agree with the very high rating assigned for the terrestrial biodiversity theme in the Environmental Screening Tool report. The specialist rates the terrestrial biodiversity theme for the property as medium.

The specialist is not opposed to the proposed development from a terrestrial biodiversity perspective if all the mitigation measures are implemented.

- A control plan for alien vegetation in the proposed open spaces should be part of the EMPr.
- The proposed Open Space (Conservation area) should have access control (fencing) to prevent trampling of plant SCC.

Site Sensitivity Verification and Agricultural Compliance Statement: Johann Lanz

The overall conclusion of this assessment is that the proposed development is acceptable because it leads to no loss of existing viable croplands and leads to no loss of future agricultural production potential. The report indicates "None required" for impact management outcomes.

Traffic Impact Statement - Mr Hoosain Cassoo

- Access to the site in accordance with the AMP for MR3344/R102 will be positioned opposite Wildeperske Street in Rheebok. The site access road will thus form a fourth leg (minor approach) at this existing T-junction.
- At present there are no public transport services along the MR344/R102. However, in accordance with the Mossel Bay Integrated Public Transport Network Report a bus service will be rolled out in the future and the MR344/R102 has been earmarked as a route and bus stops may be expected within comfortable walking distance from the site.

- The additional traffic generated by the proposed development is expected to have a low impact on the road network during peak hours.
- In terms of the RAG, a dedicated right turn lane on MR344/R102 is required as the PM peak hour volume of vehicles expected to turn right exceeds 30 vehicles. However, the low opposing traffic flow makes it unlikely that a right turn lane would be justified in the foreseeable future.
- The report recommends that the Mossel Bay Municipality and Western Cape Government approve the proposed residential development, since it was found to have a low impact on traffic operations at the key intersection in the study area.

Electrical Tech Report- BDE Consulting Engineers

- The entire internal electrical distribution network will be carefully designed to blend in with the existing town area of Rheebok as well as the natural environment.
- All structures, equipment and switchgear will be low profile, following natural contours.
- An environmental management plan for the two-erven development will be applied as it forms an integral part of the specification and requirements for electrical construction work.
- Distribution kiosks and streetlight poles will be located within the road reserves to prevent additional disturbance of vegetation.

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

No specialist investigations or impact management measures identified that will be excluded from implementation. All recommendations provided by the relevant specialists will be incorporated into the project planning, construction, and operational phases.

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

During the construction phase:

- Altered Landscape and Sense of Place: Low negative impact significance
- Visibility of the Development for Residents: Low negative impact significance
- Dust and Noise: Low negative impact significance
- Production and local economy: High positive impact significance
- Employment: High positive impact significance
- Household income: High positive impact significance
- Rates and taxes: Medium positive impact significance
- Sense of place (Socio-economic): Low negative impact significance
- Surrounding property values: Low negative impact significance

During the operational phase:

- Altered Landscape and Sense of Place: Low negative impact significance
- Visibility of the Development for Residents: Medium negative impact significance
- Lighting Visual Impact: Medium negative impact significance
- Production and local economy: High positive impact significance
- Employment: High positive impact significance
- Household income: High positive impact significance
- Rates and taxes: Medium positive impact significance
- Sense of place (Socio-economic): Low negative impact significance
- Surrounding property values: Low positive impact significance

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

The standard building mitigation to make the proposed development energy efficient and reduce water demands have become requirements in recent years and will be implemented. This will reduce the demand on water resources and energy. The proposed site is however located approximately 70m above sea level and more than 600m from the Mid-Brak coastline. As such the site itself is located far enough from potential impacts of sea level rises.

6.	Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.
No conflicting recommendations.	
7.	Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.
All impact management measures that were identified by all the specialists will be included in the EMPr. Please refer to Section I (2) for the specialist Impact Management Measures.	
8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.

MITIGATION HIERARCHY		
1	AVOID IMPACTS	All the specialists found that there will be low impact on the biophysical environment. The botanist recommended that the proposed Open Space (Conservational area) should have access control (fencing) to prevent trampling of plant SCC.
2	MINIMIZE IMPACTS	The implementation of the EMPr during the construction phase will minimise the impacts associated with the construction phase.
3	RECTIFY	The disturbances created by the construction phase will be rehabilitated in accordance with the EMPr.
4	OFFSET	No formal no-go areas have been identified for the proposed development. However, all areas outside of the working corridor and development footprint will be considered "No-Go" areas.

SECTION J: GENERAL

1. Environmental Impact Statement

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

The proposed residential development on Portion 1 of Farm 331 and Portion 4 of Farm Rheeboksfontein 142 (the property), Mid-Brak, Mossel Bay Local Municipality. The property is located approximately 2.3 km east of Klein Brak's mapped town centre and approximately 1.5 km northwest of Tergniet between the N2 to the north and R102 to the south.

The current impacts within the study area include the following:

- 4x4 tracks
- Stormwater control management structures
- Alien vegetation clearing
- Sand mining
- Flood damage repairs
- Loss of 9,47 ha of a threatened habitat (Hartenbos Dune Thicket EN)
- Loss of 9,47 ha of Critical Biodiversity Area
- Declining animal diversity due to ongoing alien vegetation invasion

A terrestrial Critical Biodiversity Area 1 (CBA 1 - terrestrial) is mapped to extend across the entire property, with some small areas mapped as terrestrial Critical Biodiversity Area 2 (CBA 2 - terrestrial).

The threatened plant species sensitivity map (Figure 20) was compiled based on the distribution, abundance, and conservation status of species of conservation concern (SOCC). The unshaded areas are considered to have medium sensitivity in relation to plant SOCC. A population of Muraltia knysnaensis (Endangered), located in the eastern section of the property, is regarded as viable and is therefore assigned a high sensitivity rating. In contrast, the other two plant species of conservation concern are present in very low numbers and are unlikely to persist in the long term.

Three Species of Conservation Concern were recorded on the property:

1. Muraltia knysnaensis
2. Hermannia lavandulifolia
3. Gnidia chrysophylla

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

Figure 21: Sensitivity map

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

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

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

To achieve the intended impact management objectives, the mitigation measures outlined in the Basic Assessment Report (BAR) must be fully implemented.

An independent Environmental Control Officer (ECO) must be appointed to carry out impact monitoring. The ECO will report on the implementation of all mitigation measures throughout the duration of the development. If all prescribed measures are effectively implemented, the resulting outcomes will ensure that the development proceeds with no significant or avoidable environmental impacts.

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

An Environmental Control Officer must be appointed to monitor the compliance and implementation of the Environmental Management Programme, mitigation measures and the Environmental Authorization conditions.

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

The proposal should be authorised, the implementation of the EMPr must be monitored by a suitable qualified and experienced ECO.	
2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.
	Assumptions: • It is assumed that the development will strictly adhere to the site layout and no-go zones as identified in the approved development plan. • Existing baseline data on vegetation, fauna, and hydrology are assumed to reflect current conditions, as field surveys were conducted at a specific point in time. Uncertainties: • The long-term effectiveness of alien vegetation control measures may be uncertain, as reinvasion is possible without ongoing management. • Climate-related events, such as extreme rainfall or drought, could influence stormwater management effectiveness and soil erosion rates. Gaps in Knowledge • Some subsurface hydrological interactions and soil characteristics may not have been fully characterised, which could affect erosion and drainage predictions. • The cumulative impacts of the proposed development in combination with existing and future developments in the Mid-Brak area are not completely quantifiable. • Impacts and Risks associated with the proposed development.
2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.

3. Water

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.
The following general water saving practices are proposed: • Conduct routine maintenance to prevent leaks in pipes, irrigation systems, and storage tanks • Implement regular water monitoring and metering to identify excessive use or leaks • Low flow taps and showerheads • Dual-flush toilets • Rainwater harvesting tanks must be installed where possible • Use settlement tanks to treat and reuse construction water for dust suppression • Use of non-potable water sources such as treated wastewater, harvested rainwater, or groundwater (if permitted) for construction activities.

4. Waste

Explain what measures have been taken to reduce, reuse or recycle waste.
The EMPr will encourage waste management through the various phases of the project. Construction Phase: • An integrated waste management approach (AVOID first, then REDUCE, then REUSE, then RECYCLE, then DISPOSAL) must be adopted.

- Adequate waste receptacles, bins and skips should be available for the collection and removal of waste.
- Individual recycling bins for the various categories (paper, glass, plastic, etc.) must be provided, labelled and have a designated area on site, close to access points (for easy removal), away from any natural areas, and should have appropriately weighted lids, to prevent the wind from toppling the bins, resulting in waste dispersal.
- These bins must be emptied on a weekly basis and dropped off at a collection point for recycling, by recycling companies, ensure that a waste slip is obtained as proof of this, and have this filed in the Environmental File.
- Infographics and educational notices to create awareness around sustainable waste management should be provided.
- Environmental awareness training will be conducted for all site workers to create awareness.
- Any solid waste intended for disposal must be disposed of at a landfill site, licensed in terms of section 20 of the Environment Conservation Act, 1989 (Act No. 73 of 1989) or the National Environmental Management: Waste Act (Act No. 59 of 2008).

Operational Phase:

- Appropriate waste receptacles should be established, for permanent use during operational phase.
- Separation of waste, in separate, labelled waste receptacles, should be encouraged.
- Littering should be restricted, and signage should be erected accordingly.
- On-going monitoring of stormwater infrastructure should be undertaken.

5. Energy Efficiency

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

Electrical Services report – BDE Consulting Engineers

According to the report, the development will have a minimal effect on the quality of supply to the existing customers, since the development will be supplied by an underground cable system from the private mini substation.

Adequate medium voltage capacity exists on the existing overhead lines, to accommodate the two erven development. The design, supply, and installation of the MV Bulk point, as well as the private LV network, will be done in accordance with the ruling Municipal specifications and requirements.

SECTION K: DECLARATIONS

DECLARATION OF THE APPLICANT

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

I.....L.A. de Jager....., ID number ...5701085108080 in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
  - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - Legitimate costs in respect of specialist(s) reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

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

Signature of the Applicant: Date: 27.4.2026

Name of company (if applicable): Reebok Ontwikkelings pty ltd

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I Michael Bennett..... ,EAP Registration number 2021/3163..... as the appointed EAP hereby declare/affirm the correctness of the:

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

Signature of the EAP: Date: 29 April 2026

Sharples Environmental Services

Name of company (if applicable):

DECLARATION OF THE REVIEW EAP

I ……, EAP Registration number …….. as the appointed Review EAP hereby declare/affirm that:

- I have reviewed all the work produced by the EAP;
- I have reviewed the correctness of the information provided as part of this Report;
- I meet all of the general requirements of EAPs as set out in Regulation 13 of the NEMA EIA Regulations;
- I have disclosed to the applicant, the EAP, the specialist (if any), the review specialist (if any), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.

Signature of the EAP: Date:

Name of company (if applicable):

DECLARATION OF THE SPECIALIST

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

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

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

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

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

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

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

Signature of the EAP: Date:

Name of company (if applicable):

DECLARATION OF THE REVIEW SPECIALIST

I ……., as the appointed Review Specialist hereby declare/affirm that:

- I have reviewed all the work produced by the Specialist(s):
- I have reviewed the correctness of the specialist information provided as part of this Report;
- I meet all of the general requirements of specialists as set out in Regulation 13 of the NEMA EIA Regulations;
- I have disclosed to the applicant, the EAP, the review EAP (if applicable), the Specialist(s), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.

Signature of the EAP: Date:

Name of company (if applicable):