



COMMENTS AND RESPONSES REPORT – POST-APPLICATION DRAFT BAR

Date and Commenter		Comment	Response
Correspondence with the Competent Authority			
Acknowledgement of receipt of the Application form			
Department of Environmental Affairs and Development Planning Steve Kleinhans 15 June 2026	1.	The undated application form compiled on your behalf by your appointed Environmental Assessment Practitioner ('EAP'), Ms. Madeleine Knoetze (EAPASA No: 2021/3230) of Sharples Environmental Services cc ('SES'), and received by this Department on 4 June 2026 refers.	The acknowledgement of receipt for the application form has been received. The Department is hereby thanked for the correspondence. Please note that all the pages of the application form that required signatures were signed. Submission was made as per the email correspondence on 4 June 2026. Kindly note that the revised application form will be submitted with the Revised Draft Basic Assessment Report (BAR) with a cover letter clearly stipulating the date of the submission (of both the Revised Application form and the Revised DBAR).
	2	The application form appears to be in order in accordance with regulation 16. This letter serves as an acknowledgment of receipt of the aforementioned document by this Department on 4 June 2026.	The Department is thanked for the confirmation of receipt of the Application form.

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	3.	It is understood that the proposal entails the following: A secondary school (with the capacity to accommodate 2600 learners) with a school hostel, an administrative building and main hall. This portion of the development will also include a clubhouse and the rugby fields/athletics track. A total number of three rugby fields will be established within the proposed development site. A tertiary education centre with the capacity to accommodate approximately 450 students and student accommodation with the capacity to accommodate approximately 136 students. A hospital and associated infrastructure, including staff Accommodation and a helicopter landing pad. Internal and external auxiliary infrastructure including network of internal roads and parking bays catered specifically toward the portion of the proposed development to be serviced. The number of parking bays allocated to the proposed development aligns with the requirements of the Mossel Bay Municipal Zoning Scheme; the installation of a new sewer pump station on site as well as a new pressure line, leading from the proposed development site to the Hartenbos Regional WWTW and an access road with a width of between 5.2 m and 7.4 m with the widest reserve being 20 m. All services (water, sewer, electricity, and solid waste) will be provided by the Mossel Bay Local Municipality. No additional bulk water infrastructure will be required, as there is a Ø500 mm bulk supply line leading from the 7Mℓ Jakkalskop Reservoir leading along the southern boundary of the proposed development site along which the project will tie into. However, confirmation of services from Mossel Bay Municipality: Infrastructure Services must be submitted with the BAR.	The summary of the project description provided in the comments to the Application form is correct, however, please note following the conclusion of the PPP of the Draft BAR, the external sewer alignment was modified in order to align with the Sewer Master Layout Plan for the Municipality. Please note obtaining the confirmation of services is currently in process and will be provided as part of the Final BAR. In the interim, please see the confirmation of the capacity in terms of the sewer and water as confirmed in the GLS Report dated 16 September 2026, included as Appendix M4 of the Revised Draft BAR.
	4	Please remind your EAP that the requirements in terms of the Environmental Management Act (Act No. 107 of 1998) ("NEMA") and the Environmental Impact Assessment Regulations, 2014 (as amended) ('EIA Regulations, 2014') must be complied with in respect of the application for Environmental Authorisation.	This comment is acknowledged and the EAP is aware of the requirements of the legislation. Please see the CV of the EAP attached as Appendix M4 of the Draft Basic Assessment Report providing proof of the competency of the EAP.
	5	Applicable listed activities Only the listed activities applied for can be considered for authorisation. Kindly note that the onus remains on the applicant to ensure that all the applicable listed activities are applied for and assessed as part of the Basic Assessment process.	This requirement is hereby acknowledged, please note that the Application form for Environmental Authorisation has been revised to include listed activity 10 of Listing Notice 1 of 2014, as amended (GNR 327 of 2017) as the revision to the external sewer line would trigger this activity.



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	6	Site Development Plan The preferred SDP attached to the application form is noted. You are reminded that the EIA Regulations require that a map (i.e., a site development plan) at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; be submitted with the relevant EIA reports. The SDP must be submitted in a digital format with the Application and the Shape Files (.shp) for the site development plans must be in the Hartebeesthoek94 WGS84 co-ordinate system, and such plans must be included in an electronic copy of the report submitted to the competent authority.	This requirement is acknowledged, please note the revised superimposed Site Development Plan has been included as Appendix B2 of the Revised Basic Assessment Report and as part of the submission to DEADP, the shapefiles will be provided in both the upload folder, as well as the email containing the proof of submission.
	7	Project Plan Your Project Plan (submitted together with the Application Form), is hereby acknowledged and largely appears to be in order.	Thank you for this acknowledgement.
	8	Public Participation Process Please be advised that you must comply with the requirements of Regulation 41 of the EIA Regulations, 2014, during the application phase. This includes inter alia the placement of an advertisement in the local newspaper, the placement of a site notice at the site and informing owners, persons in control of, and occupiers of land adjacent to the site; and informing relevant State Departments and Organs of State which administers a law in respect of the proposed development. Failure to comply with Regulation 41 may prejudice the outcome of this application for environmental authorisation.	This requirement is acknowledged, please refer to Section F of the Revised DBAR for the detailing of the Public Participation Process undertaken for the project.
	9	Consideration of Government Policies and Plans, Guidelines, Environmental Management Instruments You are advised that when undertaking the EIA process, it is the responsibility of the EAP and Specialists to take into account all the government policies and plans, guidelines, environmental management instruments and other decision making instruments in respect of the application process or the kind of activity which will be the subject of the application, including the guidelines, information documents or circulars developed by this Department.	This requirement is acknowledged and where applicable, Section C of the Revised Draft BAR was updated accordingly.

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	10	Requirements The BAR must contain all the information outlined in Appendix 1 of GN No. R. 982 of 4 December 2014 (as amended) and must also include and address any information requested in any previous correspondence/ processes in respect of this matter. The previous correspondence (Ref: 16/3/3/6/7/1/D6/29/0273/25) refers in this regard. In accordance with Regulation 19 of the EIA Regulations, 2014, the Department hereby stipulates that the BAR (which has been subjected to public participation) must be submitted to this Department for decision within 90 days from the date of receipt of the application by the Department. If however, significant changes have been made, or significant new information has been added to the BAR, the applicant/EAP must notify the Department that an additional 50 days (i.e. 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information. If the BAR is not submitted within 90 days or 140 days, where an extension is applicable, the application will lapse in terms of Regulation 45 of the EIA Regulations, 2014, and your file will be closed. Should you wish to pursue the application again, a new application process would have to be initiated. A new Application Form would have to be submitted.	The requirements of Appendix 1 of the EIA Regulations of 2014, as amended, are acknowledged. The EAP has included a table into the Revised DBAR so as to clearly stipulate where compliance with the relevant requirements can be found in the BAR. Further to this, the Department has been notified of the extension of the legislated timeframe (allowable in terms of Regulation 19). Therefore, the Final BAR will be submitted within 140 days of the submission of the Application form for Environmental Authorisation (26 October 2026).
	11	Please note that it is an offence in terms of Section 24F and 49A of the NEMA for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.	The Applicant is aware of the penalties associated with offenses committed in terms of the National Environmental Management Act of 1998, as amended. The Applicant strives to undertake all process required in terms of the Strategic Environmental Management Acts (SEMA's) in order to ensure that the project is environmentally sound.
	12	Kindly quote the above-mentioned reference number in any future correspondence in respect of this matter.	This request is acknowledged and has been adhered thus far.
	13	This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received.	The rights highlighted by the Department in this item is acknowledged. Should the Department have any further comments or queries as they pertain to the application, please do not hesitate to contact us.
Comments on the Draft Basic Assessment Report			



Date and Commenter		Comment	Response
Department of Environmental Affairs and Development Planning Steve Kleinhans 22 June 2026	1	The Draft Basic Assessment Report (Ref: CT04/HBD/Post-DBAR/06/25) dated 12 June 2026 compiled on your behalf by your appointed Environmental Assessment Practitioner ('EAP'), Ms. Madeleine Knoetze (EAPASA No: 2021/3230) of Sharples Environmental Services cc ('SES'), and received by this Department on 12 June 2026 refers.	Thank you for the acknowledgement of receipt, the Competent Authority's comments on the Draft Basic Assessment are hereby acknowledged and will be incorporated as required into the BAR and EMPr.
	2	The Directorate: Development Management (Region 3) ('this Directorate') has reviewed the DBAR and provides the following comments:	Thank you for the comments provided on the Draft Basic Assessment Report for the proposed development.
	2,1	Agricultural aspects According to the BAR the single, direct agricultural impact of this development is the total loss of agricultural production potential due to the permanent exclusion of agriculture from the development site. According to the Agricultural Agro-Ecosystem Specialist Assessment Report the site does not form part of a Protected Agricultural Area ('PAA') but that the entire development footprint is above the threshold of being worthy for conservation as agricultural production land because its agricultural potential makes it suitable as viable cropland. The assessment indicates that the overall negative agricultural impact of the proposed development is assessed as MEDIUM. In light of the above, you are required to consult the National Department of Agriculture and the Western Cape Government: Department of Agriculture in terms of the Standard Operating Procedure ('SOP') as communicated on 25 March 2026 (Ref: 14/7/6) and obtain their written comment in respect of the proposed development.	The comment from the Department is acknowledged. The NDoA has been included as part of the PPP for the project and urged to provide comment on the application. To date comments have not been received. The town planner appointed for the proposed development has also submitted a formal application to the Department of Agriculture in terms of South Africa's Subdivision of Agricultural Lands Act, 1970 (SALA, Act No. 70 of 1970) and all other relevant legislation, toward the clearance of the Agricultural lands. Further to the Agricultural Agro-Ecosystem Assessment Report included in the Draft Basic Assessment Report, the specialist was requested to provide comment on the revised sewer infrastructure included in the Revised Draft BAR. The comment therefor has been included as Appendix G1 of the Revised Draft BAR.



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	2,2	<u>Mossel Bay Municipality: Environmental Management Framework 2023</u> Framework and Urban Areas (2023) ('EMF') on 30 May 2024 in terms of the requirements of Section 24(3) of NEMA. According to the EMF the proposed development site is located within the Agriculture Management Zone. The EMF has specific guidelines on the land use and activities that may be allowed within the zone. In light of the above, you are required to demonstrate and motivate how the proposal aligns with the objectives of this zone. Please be informed that the Western Cape Minister for Local Government, Environmental Affairs and Development Planning adopted the Mossel Bay Municipality Environmental Management	The Section E 4.4 of the revised BAR has been to revised to include reference to the approved Agriculture Management Zone.
		<u>Terrestrial Faunal and Avifaunal Compliance Statement</u> According to the Faunal and Avifaunal Specialist input, the field survey undertaken represent an incomplete reflection of faunal species richness and abundance of the site due to seasonal, or cryptic species behaviours. This represents a gap in knowledge. Kindly consider including specific mitigation to address this limitation.	The Faunal and Avifaunal Specialist has been consulted to indicate the significance of the identified gap in the knowledge. In order to address the concerns raised by the Department, the following mitigation measure have been included in the Revised Draft BAR and the Revised Draft Environmental Management Programme (EMPr) for the project: - A faunal sweep must be undertaken by a suitably qualified specialist prior to the commencement of the construction activities. Should any faunal Species of Conservation Concern be identified on site, the species is to be safely removed from site under the supervision of the beforementioned specialist. Please note that the specialist has provided an Addendum to their report, commenting on the impact of the newly proposed sewer infrastructure. As indicated in Appendix G2b, the proposed infrastructure will not have a significant impact on the receiving environment from a faunal perspective.



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	2,4	<u>Terrestrial Biodiversity and Terrestrial Plant Species Assessment</u> According to the Terrestrial Biodiversity and Terrestrial Plant Species assessment a few <i>Sideroxylon inerme</i> (milkwood) trees are present on site and some of these can possibly be accommodated in the development layout. Considering the aforementioned, you are required to include coordinates of these milkwood trees and apply the mitigation hierarchy to the planning of the development, especially pertaining to these protected trees.	The Terrestrial Biodiversity Specialist was requested to provide further comments to this aspect. A such, the superimposed map (Appendix B2) has been updated to include the Species of Conservation Concern and the trees required to be protected, has been indicated in red, whereas all specimens for which a permit will be required has been indicated in yellow. Please note that the specialist has provided an Addendum to his report, commenting on the impact of the newly proposed sewer infrastructure. As indicated in Appendix G6b, the proposed infrastructure will not have a significant impact on the receiving environment from a terrestrial biodiversity impact perspective.
	2,5	<u>Palaeontological and Cultural Heritage</u> The specialist input provided on the Palaeontological and Cultural Heritage aspects foresees no reason why the proposal cannot be approved. Kindly ensure that comment is obtained by Heritage Western Cape and included in the final BAR to be submitted to this Directorate for decision-making.	This requirement is acknowledged and Heritage Western Cape have been included in the circulation of the Basic Assessment report for comment. Please note that the specialist has provided an Addendum to his report, commenting on the impact of the newly proposed sewer infrastructure. As indicated in Appendix G3b, the proposed infrastructure will not have a significant impact on the receiving environment from a heritage impact perspective.

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	2,6	Relevant listed activities The information provided, does not allow this Department to determine with certainty that Environmental Impact Assessment Regulations Listing Notice 2 of 2014 (Government Notice No. R. 984 of 4 December 2014, as amended) Activity No. 15 is not applicable to the proposal. The DBAR indicates that the proposal will only require the clearance of 3.5ha of indigenous vegetation while the development footprint is anticipated to be 28.5ha in size. Kindly provide a motivation for not including this activity in the list applied for. This motivation may include, but is not limited to, written proof that the proposed site has been legally cleared / cultivated within the preceding 10 years. Kindly be reminded that only the listed activities applied for can be considered for authorisation. Kindly note that the onus remains on the applicant to ensure that all the applicable listed activities are applied for and assessed as part of the Basic Assessment process.	As per google earth imagery dating back to 2013 (at the time of the compilation of this CRR, it is 2026), the historical land use was Agriculture. Therefore, this listed activity referenced by the Department is not applicable. The absence of the indigenous vegetation on site is confirmed by the Terrestrial Biodiversity Specialist. As per Figure 5-1 of the Terrestrial Biodiversity Impact Assessment, the majority of the site is in a transformed state and does not contain remnants of indigenous vegetation. The Section G 4.5 of the BAR does include this information.
	2,7	Need and desirability of the proposed development The proposal entails the development of a school and hospital which are institutions which operate under the framework of national legislation and provincial oversight. In light of the above you are strongly advised to obtain the written comment from the relevant directorates within the Western Cape Government: Department of Education and the Western Cape Government: Department of Health regarding the need for such institutions at this location at this time. Furthermore, the hospital is a large component of the development proposal. As part of the motivation in terms of need and desirability you are also requested to provide input on how the proposed development aligns with the Western Cape Healthcare 2030 strategy.	The comment from the Department is acknowledged. The DOH has been included as part of the PPP for the project and has been urged to provide input. To date comments have not been received, however, urgent comment will continue to be sought. The Needs and Desirability Section of the BAR will be updated to incorporate the Western Cape Healthcare 2030 Strategy.



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	2,8	Traffic Impact Assessment The findings of the Traffic Impact Assessment are noted. According to the Traffic Impact Assessment access to the proposed development will be gained from Main Road 344 ('MR344' / 'R102 Provincial Road') directly opposite the existing Hartland Lifestyle Estate access. Furthermore, it is understood that changes may be required at certain intersections. The Western Cape Government: Department of Infrastructure – Road Planning ('Dol'), as the managing authority of the MR344, is considered as the 'landowner' / 'person in control' of the roads. Therefore, the comment / approval of the proposed changes associated with the proposed development from Dol is a critical aspect of the application for environmental authorisation, and this must be addressed	The comment from the Department is acknowledged. The DOI has been included as part of the PPP for the project. To date, no formal comments have been received however the engineer has had several meetings with the DOI regarding the access. The access point and the development as a whole has been included in the Mosel Bay Municipality's master planning and confirmation of the approval of the location of the access will be included in the Final BAR.
	2,9	Visual Impact Assessment This Directorate notes the findings of the Visual Impact Assessment ('VIA'). According to the VIA the proposed development will be visible from a range of receptor locations, particularly along the N2/R102 corridor and from elevated parts of the Hartenbos/Bayview settlement. Furthermore, it is indicated that due to the openness of the terrain and a lack of tall indigenous trees the Visual Absorption Capacity of the landscape is low. In light of the above, it is strongly advised that design features to reduce the visual impact of the proposed development are included in the BAR and Environmental Management Programme ('EMPr'). Furthermore, it is also advised that a landscaping plan be compiled for inclusion in the EMPr.	Please note the Visual Impact Assessment Specialists have updated their report based on the comments received by the Department. The revised Visual Impact Assessment has been included as Appendix G5 of the Revised Draft BAR.



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	2,10,	Confirmation of Municipal Services Please be reminded that this Department will require official written confirmation from the Mossel Bay Municipality regarding availability of unallocated bulk services (i.e. potable water supply; wastewater treatment capacity; disposal of solid waste; etc.) to service total demand for the proposal, or sufficient approved unallocated capacity able to accommodate the abovementioned application in future. This includes capacity of the existing network infrastructure to accommodate the proposed development on the municipal network. Any additional expansion of the services already approved of by the environmental authority but not yet effected must be highlighted.	This requirement raised by the Department is hereby acknowledged. The engineers appointed for the project have been in communication with the engineering department within the Municipality towards obtaining the confirmation of services. In the interim, please see the GLS report for the proposed development attached as Appendix M4, indicating that the Municipality has sufficient capacity to support the proposed development from a water and sewer perspective.



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	2,11	<u>Requirements in terms of the National Water Act, Act 36 of 1998</u> According to the Aquatic Biodiversity Compliance Statement, a non-perennial drainage line is mapped to run through the valley but that there is no distinct channel upstream of the dam and the entire area has been transformed for cultivation and an ostrich camp. It is understood that flow paths indicated flow of water along the valley bottom downstream of the dam are only visible in historical aerial imagery taken during wetter periods. Considering the above, it is unclear whether authorisation in terms of Section 21(c) and (i) of the National Water Act, Act 36 of 1998 ('NWA') is required. Please be advised that the National Environmental Management Laws Amendment Act, Act 2 of 2022 (NEMLAA), came into effect on 30 June 2023. This Act added sub-section 24C(11) to the National Environmental Management Act, Act 107 of 1998, as amended (NEMA) which requires that 'a person who requires an environmental authorisation which also involves an activity that requires a licence or permit in terms of any of the specific environmental management Acts (i.e., NWA), must simultaneously submit those applications to the relevant competent authority or licensing authority, as the case may be, indicating in each application all other licences, authorisations and permits applied for'. Considering the above, you are advised to liaise and consult with the relevant authority, the Breede-Olifants Catchment Management Agency ('BOCMA') regarding the requirement for water use authorisation urgently. Please be advised that the EIA process and the Water Use Application process must be synchronised. You are reminded that if these processes are not properly aligned, the lack of synchronisation; omission of any reports/information; or delay as a result thereof, may prejudice the success of the application for environmental authorisation.	This comment by the Department is hereby acknowledged and it is confirmed that a process in terms of the National Water Act, 1998 (Act No. 36 of 1998) is required. BOCMA has been consulted in regards to the project and as such further inputs will be sought with regards to the revised sewer infrastructure (BOCMA Reference: 4/10/2/K10F/Vaalevalley 219).



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	2,12	Environmental Management Programme: In accordance with Section 24N of NEMA and Regulation 19 of the Environmental Impact Assessment Regulations, 2014 ('EIA Regulations, 2014') (Government Notice No. R. 982 of 4 December 2014, as amended), the applicant is required to submit an Environmental Management Programme ('EMPr') with the BAR. The contents of such an EMPr must meet the requirements outlined in Appendix 4 of the EIA Regulations, 2014. The EMPr must address the potential environmental impacts of the activity throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing). It must be submitted together with the BAR. When compiling the EMPr, the Department's Guideline for Environmental Management Plans (June 2005), must be considered. The EMPr to be submitted must include the coordinates of the milkwood trees which will be retained in the SDP as well as the buffer zones and no-go areas.	The minimum requirement for the EMPr for the project are acknowledged and the EMPr strives to comply with these requirements. Please see the tables on pages 4-5 of the EMPr providing the legislative requirements and the sections within which the information can be found. Furthermore, the SDP, inclusive of the milkwood trees to be conserved as part of the proposed works and all no-go and buffer areas have also been included in the EMPr.



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	3	<u>Submission of Basic Assessment Report</u> The BAR must contain all the information outlined in Appendix 1 of the EIA Regulations, 2014, and must also include the information requested in the correspondence issued by the Department, including any pre-application consultation with the Department. Failure to submit any information prescribed in Appendix 1 of the EIA Regulations, 2014 may prejudice the outcome of the Environmental Authorisation and it may even be refused. Please be reminded that in accordance with Regulation 19 of the EIA Regulations, 2014, the Department hereby stipulates that the BAR (which has been subjected to public participation) must be submitted to this Department for decision within 90 days from the date of receipt of the application by the Department. However, if significant changes have been made or significant new information has been added to the BAR, the applicant/EAP must notify the Department that an additional 50 days (i.e. 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information. If the BAR is not submitted within 90 days or 140 days, where an extension is applicable, the application will lapse in terms of Regulation 45 of the EIA Regulations, 2014, and your file will be closed. Should you wish to pursue the application again, a new application process would have to be initiated. A new Application Form would have to be submitted. NOTE: Furthermore, in accordance with Environmental Impact Assessment best-practice, you are kindly requested to notify all registered Interested and Affected Parties including the authorities identified in the Public Participation Plan of the submission of the FBAR and to make the document available to them. This will provide such parties an opportunity to review the document and how their issues were addressed.	The requirements of Appendix 1 of the EIA Regulations of 2014, as amended, are acknowledged. The EAP has included a table into the Revised DBAR so as to clearly stipulate where compliance with the relevant requirements can be found in the BAR. Further to this, the Department has been notified of the extension of the legislated timeframe (allowable in terms of Regulation 19). Therefore, the Final BAR will be submitted within 140 days of the submission of the Application form for Environmental Authorisation (26 October 2026).



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	4	Please note that a listed activity may not commence prior to an environmental authorisation being granted by the Department. It is an offence in terms of Section 49A of the National Environmental Management Act, 1998 (Act no. 107 of 1998) ("NEMA") for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment	The Applicant is aware of the penalties associated with offenses committed in terms of the National Environmental Management Act of 1998, as amended. The Applicant strives to undertake all process required in terms of the Strategic Environmental Management Acts (SEMA) in order to ensure that the project is environmentally sound.
	5	Kindly quote the above-mentioned reference number in any future correspondence in respect of this matter.	This request is acknowledged and has been adhered thus far.
	6	This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received.	The rights highlighted by the Department in this item is acknowledged. Should the Department have any further comments or queries as they pertain to the application, please do not hesitate to contact us.
Stakeholders			
CapeNature Marianne de Villiers 13 July 2026		Please be advised that CapeNature is regrettably unable to review and provide formal comments on this application. Due to capacity constraints resulting from a vacant Land Use Scientist post, we are unable to process this proposal within the stipulated timeframe. This response should not be interpreted as support or objection to the proposed development. Please continue to process the application and consult with the other required stakeholders. We apologize for any inconvenience this may cause and appreciate your understanding. Please keep CapeNature on your stakeholder list for future notifications; we will respond when our capacity allows.	CapeNature's current capacity constraints and request to remain on the Stakeholder list for the project is hereby acknowledged.
Breede-Olifants Catchment Management Agency Tshembhani Ngobeni 14 July 2026	1	The Breede-Olifants Catchment Management Agency (BOCMA) acknowledges receipt of the application, dated 12 June 2026, for the abovementioned proposed development. The application was received by the Agency on 12 June 2026. Following a review and evaluation of the proposed activity and its anticipated impacts on water resources, the BOCMA has no objection to the proposed development of a school and hospital on Farm Vaalevalley No. 219, Hartenbos, located within the jurisdiction of the Mossel Bay Local Municipality, Western Cape. This office would like to provide the following comments on the submitted documentation.	The correspondence with BOCMA is hereby acknowledged.



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	2	BOCMA does not object to the proposed development subject to compliance with the following condition: 2.1 The proposed development of a school and hospital on Farm Vaalevalley No. 219, Hartenbos, located within the jurisdiction of the Mossel Bay Local Municipality, Western Cape, is expected to trigger water uses in terms of Section 21(c) and Section 21(i) of the National Water Act, 1998 (Act No. 36 of 1998), as amended.	This is acknowledged and confirmed. Please note that Confluent is overseeing the application for the project with the BOCMA reference number 4/10/2/K10F/Vaalevalley 219, Hartenbos. Further correspondence pertaining to the revised sewer layout will be undertaken through the specialist consultants.
	3	Please note no abstraction of surface or groundwater may take place or storage of water be created without prior authorisation from this office, unless it is a Schedule 1 or Existing Lawful Use as described in Section 32 of the National Water Act, 1998 (Act No. 36 of 1998) as amended.	This stipulation of the National Water Act is Acknowledged and has been incorporated into the EMPr as such.
	4	A signed letter from the Mossel Bay Municipality must be provided to inform the office if the Municipality have capacity to accommodate a new development in terms of Bulk Services.	This requirement raised by the Department is hereby acknowledged. The engineers appointed for the project have been in communication with the engineering department within the Municipality towards obtaining the confirmation of services. In the interim, please see the GLS report for the proposed development attached as Appendix M4, indicating that the Municipality has sufficient capacity to support the proposed development from a water and sewer perspective.
	5	Please ensure that no waste or water containing waste is disposed in a manner which may detrimentally impact on a water resource without authorisation from the National Water Act, 1998 (Act 36 of 1998) and other related legislations.	This requirement of the National Water Act is Acknowledged. Please note that no wastewater will be disposed on site as part of the proposed development.
	6	The applicant should be aware that according to Section 19 (1) of the National Water Act, 1998 (Act No.36 of 1998), "an owner of land, a person in control of land or a person who occupies or uses the land on which (a) any activity or process is or was performed or undertaken; or (b) any other situation exists, which causes, has caused or is likely to cause pollution of a water resource, must take all reasonable measures to prevent any such pollution from occurring, continuing or recurring". Any pollution incident(s) resulting from the discharge of treated effluent or any activity from the plant must be reported within 24 hours to the relevant authority.	The Applicant and the landowner is aware of this stipulation in the NWA. Please note that no sewer/effluent will be treated on site. It is proposed that raw sewer be collected by an onsite pump station and then be pumped via a pressure line as described in the BAR to the Hartenbos WWTW. The following has however been added to the mitigations of the Revised Draft BAR: - Should any sewer spills or leaks in the infrastructure be observed during either the construction or operational phase of the proposed development, BOCMA and DEADP must be notified within 24-hours of such an event.
	7	No stormwater runoff from the application premises containing waste, or water containing waste emanating from any activity may be discharged into a water resource without prior treatment.	This comment is acknowledged. Please note the Applicant has provided a Stormwater Management Plan for the project. The Stormwater Management Plan has been included as part of Appendix M1 of the Revised DBAR.



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Date and Commenter		Comment	Response
	8	All requirements as stipulated in the National Water Act, 1998 (Act No. 36 of 1998) regarding water use must be adhered to.	The requirements in terms of the National Water Act, 1998 (Act 36 of 1998), as amended is acknowledged.
	9	These comments do not exempt you from complying with other relevant legislations and requirements of other governmental Departments.	The comment is acknowledged and the applicant sought to comply with the requirements of all relevant legislation.
		The BOCMA reserves the right to revise initial comments and request further information based on any additional information received.	The rights highlighted by the Department in this item is acknowledged. Should the Department have any further comments or queries as they pertain to the application, please do not hesitate to contact us.