

Wittedrift Retirement Village (Erven 103 & 104, Wittedrift)

The Aquatic Habitat Impact Assessment prepared by Mrs Debbie Fordham (dated May 2020; Appendix D3) formed part of the Basic Assessment Report (BAR) process for which Environmental Authorisation (DEA&DP Ref: 16/3/3/1/D1/17/0000/21) was granted. During the subsequent Part 2 Amendment process, Mrs Fordham was contacted to confirm whether the findings and conclusions of her original assessment remained valid, as the proposed amendment was limited to an extension of the Environmental Authorisation implementation period and did not include any changes to the approved development footprint, layout, or associated infrastructure.

In response, Mrs Fordham confirmed that the extension of the implementation period did not alter the findings or conclusions of the original assessment. However, she further advised that any apparent changes to the assessed layout may require an amendment to the Water Use Authorisation (WUA) issued by the Breede-Olifants Catchment Management Agency (BOCMA).

To clarify this statement, SES requested confirmation of the layout drawings that had been submitted to BOCMA as part of the Water Use Authorisation application to determine whether the layout considered during the WUA process differed from the Environmental Authorisation-approved layout. A copy of the follow-up correspondence is attached below.

No response was received to the request for clarification.

Subsequently the available Phase 3 Water Use Authorisation submission documentation was reviewed. Figure 1 below provides a screenshot from the Phase 3 Water Use Authorisation submission, confirming that the Master Layout Plan formed part of the application submitted to BOCMA. Figure 2 below provides the Master Layout Plan submitted to the Breede-Olifants Catchment Management Agency (BOCMA) as part of the Phase 3 Water Use Authorisation (WUA) application.

Based on this review, the layout submitted as part of the Phase 3 Water Use Authorisation application corresponds with the layout approved in terms of the Environmental Authorisation.

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Name	Date modified	Type	Size	
Annexure A_Documentation	2020/08/03 14:20	Microsoft Edge P...	2 118 KB	
Annexure B_Site visit meeting register	2020/08/03 14:21	Microsoft Edge P...	276 KB	
Annexure C_Proof of payment of licence ...	2020/08/03 14:22	Microsoft Edge P...	168 KB	
Annexure D_Freshwater study report	2020/08/03 14:22	Microsoft Edge P...	7 493 KB	
Annexure E_Rehabilitation plan	2020/08/03 14:23	Microsoft Edge P...	773 KB	
Annexure F_Master Layout Plans	2020/08/03 14:24	Microsoft Edge P...	13 921 KB	
Annexure G_Civil designs	2020/08/03 14:25	Microsoft Edge P...	1 391 KB	
Annexure H_Stormwater Management Pl...	2020/08/03 14:25	Microsoft Edge P...	1 808 KB	
Annexure I_EIA Report	2020/08/04 08:26	Microsoft Edge P...	3 227 KB	
Annexure J_EMP	2020/08/04 08:27	Microsoft Edge P...	2 474 KB	
Annexure K_Construction method state...	2020/08/03 14:27	Microsoft Edge P...	1 155 KB	
Annexure L_Section 27	2020/08/03 14:27	Microsoft Edge P...	200 KB	
Annexure M_Letter on availability of servi...	2020/08/03 14:28	Microsoft Edge P...	88 KB	
WULA Technical report_Wittedrift_Final	2020/08/03 13:51	Microsoft Edge P...	4 526 KB	

Figure 1: Screenshot image: Phase 3 Water Use Authorisation Submission- Master Layout Plan



Figure 2: Layout Plan Submitted to BOCMA as Part of the Phase 3 Water Use Authorisation Application

Email Correspondence

From: cean@sesc.net
Sent: Monday, 29 June 2026 11:48
To: 'debbie@upstreamconsulting.co.za'
Cc: 'michael@sesc.net'; 'christiaan@SESCC.NET'
Subject: RE: Wittedrift Part 2 Amendment- Request for Specialist Confirmation

Hi Debbie,

Thank you for your response.

For clarity, could you please confirm what layout drawings were submitted to BOCMA as part of the application?

From: debbie@upstreamconsulting.co.za <debbie@upstreamconsulting.co.za>
Sent: Monday, 29 June 2026 10:25
To: michael@sesc.net
Cc: christiaan@SESCC.NET; 'Colin Fordham' <colin@upstreamconsulting.co.za>; cean@sesc.net
Subject: RE: Wittedrift Part 2 Amendment- Request for Specialist Confirmation

Hi Mike

Yes, that statement is correct.

Kindly be advised that the changes to the assessed layout may require amendment to the water use authorisation with BOCMA. Let me know if you require any assistance or information in that regard.

Regards



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From: michael@sesc.net <michael@sesc.net>
Sent: Tuesday, 23 June 2026 09:31
To: debbie@upstreamconsulting.co.za
Cc: christiaan@SESCC.NET; 'Colin Fordham' <colin@upstreamconsulting.co.za>; cean@sesc.net
Subject: RE: Wittedrift Part 2 Amendment- Request for Specialist Confirmation

Hi Debbie,

Thank you for your response.

Please note that the development has already been approved considering all the input received during the assessment process and the development is being undertaken in accordance with the EMPr approved by DEADP.

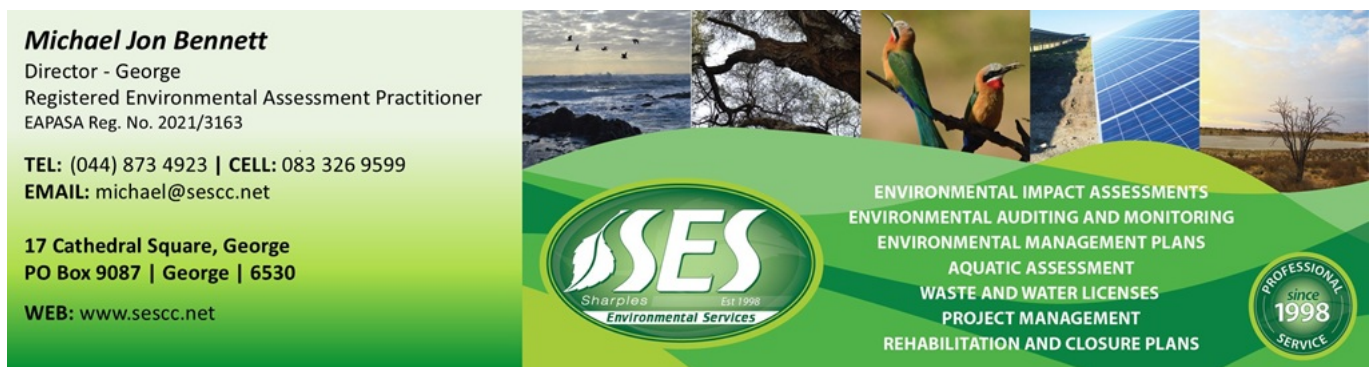
The proposed amendment is required due to delays experienced by the applicant from various departments for him to commence, as such the time specified completion date in the EA is not sufficient to complete the development due to the commencement delays.

As the proposed amendment is specifically for the extension of the completion date, which only shifts the construction period and does not increase the overall time of construction activities. The amendment therefore being applied for must only focus on the aspects related to the proposed extended completion date.

From what I understand from your email is that *“The extension of the implementation period itself does not alter the findings or conclusions of the original assessment.”*

Is this correct?

Kind regards



Michael Jon Bennett
Director - George
Registered Environmental Assessment Practitioner
EAPASA Reg. No. 2021/3163

TEL: (044) 873 4923 | CELL: 083 326 9599
EMAIL: michael@sesc.net

17 Cathedral Square, George
PO Box 9087 | George | 6530
WEB: www.sesc.net

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From: debbie@upstreamconsulting.co.za <debbie@upstreamconsulting.co.za>
Sent: Thursday, 11 June 2026 12:45
To: cean@sesc.net
Cc: michael@sesc.net; christiaan@SESCC.NET; 'Colin Fordham' <colin@upstreamconsulting.co.za>
Subject: RE: Wittedrift Part 2 Amendment- Request for Specialist Confirmation

Hi Cean,

Thank you for your email and for providing the information.

Having reviewed the documents, there appear to be some inconsistencies between the aquatic assessment recommendations and the current EMPr and stormwater proposals.

In particular, the stormwater management information provided appears to comprise only a layout drawing. Could you please provide the accompanying stormwater report, if available? Based on the information currently available, the proposed stormwater management approach:

- (a) does not appear to adequately incorporate Sustainable Drainage Systems (SuDS) principles; and
- (b) includes a piped outlet and reno mattress discharging into wetland habitat, with no detailed design drawings provided.

I draw your attention to the following recommendations contained in the aquatic assessment:

- “No infrastructure should be developed within this area, including stormwater outlets. Structures such as these must be located within the layout footprint and not encroach into the buffer areas. Otherwise the

assessment must be amended after the stormwater management plan, location of structures, and designs become available, to incorporate the impact of this encroachment.”

- “When developing a stormwater management plan for the site, it will be critical that due consideration is given to the collection and treatment of stormwater prior to discharge into the natural environment. It is therefore recommended that the stormwater management plan be developed with appropriate ecological input and be developed based on Sustainable Drainage Systems.”

Also, the rehabilitation plan was based on the premise that:

- “It is important to note that the proposed development does not include any construction within the wetland and therefore impacts on the wetland are likely to be indirect.”

In view of the above, I think that an updated assessment would be beneficial to the project. But in response to your specific questions:

- The original assessment remains generally applicable; however, some of the assumptions and recommended mitigation measures on which the assessment was based do not appear to have been fully incorporated into the current design. Specifically, the apparent encroachment into the buffer and wetland areas and the direct, concentrated discharge of stormwater to the wetland were not assessed. In the absence of additional assessment or revised mitigation measures, these aspects would result in a Medium significance impact (i.e. the significance rating without the originally proposed mitigation).
- The extension of the implementation period itself does not alter the findings or conclusions of the original assessment. However, I recommend that the above inconsistencies be considered and discussed with DEA&DP (and BOCMA) prior to commencement.

Kind regards,
Debbie



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From: cean@sesc.net <cean@sesc.net>
Sent: Thursday, 11 June 2026 07:46
To: debbie@upstreamconsulting.co.za
Cc: michael@sesc.net; christiaan@SESCC.NET
Subject: Wittedrift Part 2 Amendment- Request for Specialist Confirmation

Dear Debbie,

I hope you are well.

We are currently processing an amendment to the EA (DEA&DP Ref: 16/3/3/1/D1/17/0000/21; NEAS: WCP/EIA/0000939/2021) for the proposed retirement village at Erf 103 and 104, Wittedrift.

The amendment is limited to a validity extension from 1 November 2027 to 1 November 2032, with no change to the approved development footprint, layout, or infrastructure.

Please note that the original specialist study was completed on 27 February 2021 and the EA, EMPr, and relevant study are attached for your reference.

In terms of Regulation 32 of the NEMA EIA Regulations, 2014 (as amended), and as per DEA&DP correspondence, this amendment must follow a part 2 (substantive) amendment process, including confirmation that existing specialist studies remain valid.

Kindly confirm whether:

- your original assessment remains valid; and
- the extended implementation period has any impact on your findings or conclusions.

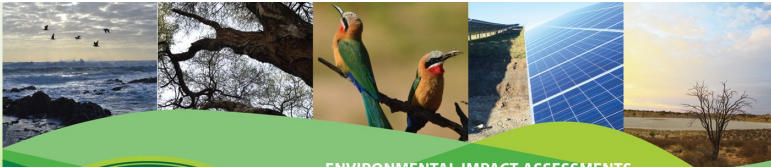
Kind regards,

Cean Cornelson
Environmental Consultant
BA Geography
BA Honours Geography and Environmental Science

TEL: (044) 873 4923
EMAIL: Cean@sesc.net

17 Cathedral Square, George
PO Box 9087 | George | 6530

WEB: www.sesc.net



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