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# DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE

PROPOSED AMENDMENT OF THE ENVIRONMENTAL  
AUTHORISATION (REF: 16/3/3/1/D1/17/0000/21) DATED  
7 OCTOBER 2021 FOR THE PROPOSED RETIREMENT  
VILLAGE AND SERVICE INFRASTRUCTURE ON ERF 103,  
104 AND A PORTION OF ROTTERDAM STREET,  
WITTEDRIFT, BITOU MUNICIPAL AREA

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

**PREPARED FOR:** The Home Market NPC  
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**DEADP REF NO:** 16/3/3/5/D1/17/0007/26  
**DEADP EA REF NO:** 16/3/3/1/D1/17/0000/21  
**EMPr REF NO:** 16/3/3/6/7/1/D1/17/0195/19  
/ 16/3/3/1/D1/17/0000/21

**DATE:** 5 August 2026



## PROJECT INFORMATION

|                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Report Ref. No:</b>    | EIR/WTD/PB/WC/08/26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| COMPILATION |                                    |                      |
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| Expertise                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Sharples Environmental Services cc (SES)</b> has been actively engaged since 1998 in the fields of environmental planning, assessment and management. Clients include private, corporate and public enterprises on a variety of differing land use applications ranging from large-scale residential estates and resorts to golf courses, municipal service infrastructure installations and the planning of major arterials. SES consultants have over 20+ years of combined experience and operate in the Southern, Eastern and Western Cape regions.</p> <p><b>MICHAEL BENNETT (Environmental Assessment Practitioner, Report Writer):</b><br/>Michael studied at the University of Cape Town completing a Bachelor of Science degree majoring in Environmental and Geographic Science and Ocean and Atmospheric Science. Michael joined SES in 2014 and has extensive experience in assessments and monitoring and has worked on a variety of technical projects. See Appendix G for his curriculum vitae. Michael is registered with EAPASA as a certified Environmental Practitioner (EAPASA # 2021/3163).</p> <p><b>CHRISTIAAN SMIT (Candidate Environmental Assessment Practitioner, Report Co-Writer):</b><br/>Christiaan graduated from the University of Stellenbosch completing his master's on the Ocean Economy and also holds a BSc in Biodiversity and Ecology with a Post Graduate Diploma in Environmental Management. Christiaan is registered with EAPASA as a Candidate Environmental Assessment Practitioner (EAPASA # 2024/8297).</p> |

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**Abbreviations:**

|              |                                                              |
|--------------|--------------------------------------------------------------|
| <b>DEADP</b> | Department of Environmental Affairs and Development Planning |
| <b>EA</b>    | Environmental Authorisation                                  |
| <b>EIA</b>   | Environmental Impact Assessment                              |
| <b>EIR</b>   | Environmental Impact Report                                  |
| <b>EMPr</b>  | Environmental Management Programme                           |
| <b>GN</b>    | Government Notice                                            |
| <b>ROD</b>   | Record of Decision                                           |
| <b>SES</b>   | Sharples Environmental Services cc                           |

|          |                     |
|----------|---------------------|
| Section  | <b>INTRODUCTION</b> |
| <b>1</b> |                     |

*Sharples Environmental Services cc (SES)* has been appointed by The Home Market NPC (the holder environmental authorisation) to apply for the amendment of the Environmental Authorisation (Ref: 16/3/3/1/D1/17/0000/21) dated 7 October 2021 for the proposed retirement village and service infrastructure on Erf 103, 104 and a Portion of Rotterdam Street, Wittedrift, Bitou Municipal Area.

The Home Market NPC wishes to amend the Environmental Authorisation (EA) for the Proposed Retirement Village and Service Infrastructure on Erf 103, 104 and a Portion of Rotterdam Street, Wittedrift, Bitou Municipal Area. Due to delays impacting the start of the construction phase on site, the provided timeframes of implementation as detailed within the EA would now be considered unfeasible. The Applicant therefore wishes to amend the EA to extend the validity period with 5 years, the current EA requires that construction activities are concluded by 30 April 2027 and post construction rehabilitation to be completed by 1 November 2027.

The amendments of the EA being applied for are:

- to extend the validity period by 5 years (1 November 2027 – 1 November 2032).

The amendment application falls within the ambit of amendments to be applied for in terms of Part 2 and Part 4 of Chapter 5 of the amended Environmental Impact Assessment Regulations (2014). The amendment is therefore subject to public participation. The public participation information will be included in the Final Impact Report.

|          |                 |
|----------|-----------------|
| Section  | <b>LOCATION</b> |
| <b>2</b> |                 |

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

**Table 1: Site location details**

|                                            |                                    |                                                                   |
|--------------------------------------------|------------------------------------|-------------------------------------------------------------------|
| <b>Province:</b>                           |                                    | Western Cape Province                                             |
| <b>District Municipality:</b>              |                                    | Garden Route District Municipality                                |
| <b>Local Municipality:</b>                 |                                    | Bitou Municipality                                                |
| <b>Ward Number(s):</b>                     |                                    | 1                                                                 |
| <b>Area / Town / Village:</b>              |                                    | Wittedrift, Plettenberg Bay                                       |
| <b>Property Description:</b>               |                                    | Erf 103, 104 and a Portion of Rotterdam Street                    |
| <b>21 Digit Surveyor General's Number:</b> | <b>Erf 103</b>                     | C03900110000010300000                                             |
|                                            | <b>Erf 104</b>                     | C03900110000010400000                                             |
|                                            | <b>Portion of Rotterdam Street</b> | C03900110000024500000                                             |
| <b>GPS Coordinates of site:</b>            |                                    | Latitude (S): 34° 00' 32.07"<br><br>Longitude (E): 23° 20' 00.37" |



Figure 1: Locality Map of the Project Area.



Figure 2: Locality Map of the Site.



**Figure 3: Site Development Plan**

| Section  |                   |
|----------|-------------------|
| <b>3</b> | <b>BACKGROUND</b> |

The Environmental Authorisation (EA) (REF: Ref: 16/3/3/1/D1/17/0000/21), was issued by the Department of Environmental Affairs and Development Planning on 7 October 2021. **The existing EA REF: (16/3/3/1/D1/17/0000/21)** has authorized the following development proposal:

The proposal entails the development of a retirement estate on Erf 103, 104 and a portion of Rotterdam Street, Wittedrift. Erven 103 and 104 and a portion of Rotterdam will be consolidated. The area where the development will take place is approximately 33 401 square meters in extent and the development will compromise the following:

- 53 Residential Units between 104m<sup>2</sup> and 124m<sup>2</sup> (Sectional title units)
- A community centre with the following components:
  - Library;
  - Kitchen;
  - Utility/storeroom;
  - Hair salon;
  - Gym;
  - Nurses station;
  - Office;
  - Wheelchair friendly toilet facilities;
  - Events hall;
  - Patio and braai;
- An assisted living facility with the following components:
  - Six (6) en-suite bedrooms for those requiring assistance;

- Assisted living quarters;
- Office;
- Kitchen;
- Laundry;
- Dining and lounge facility; and
- Yard
- Open spaces:
  - The preservation of the seven mature oak trees that are found on the southern border;
  - The northern section of the consolidated erf adjacent to the Bosfontein Rivier is a buffer area and only stormwater outlet infrastructure may be installed here.

This will require the clearance of more than 1-hectare (but less than 20-hectares) of indigenous vegetation for this purpose but approximately 3.3 ha.

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

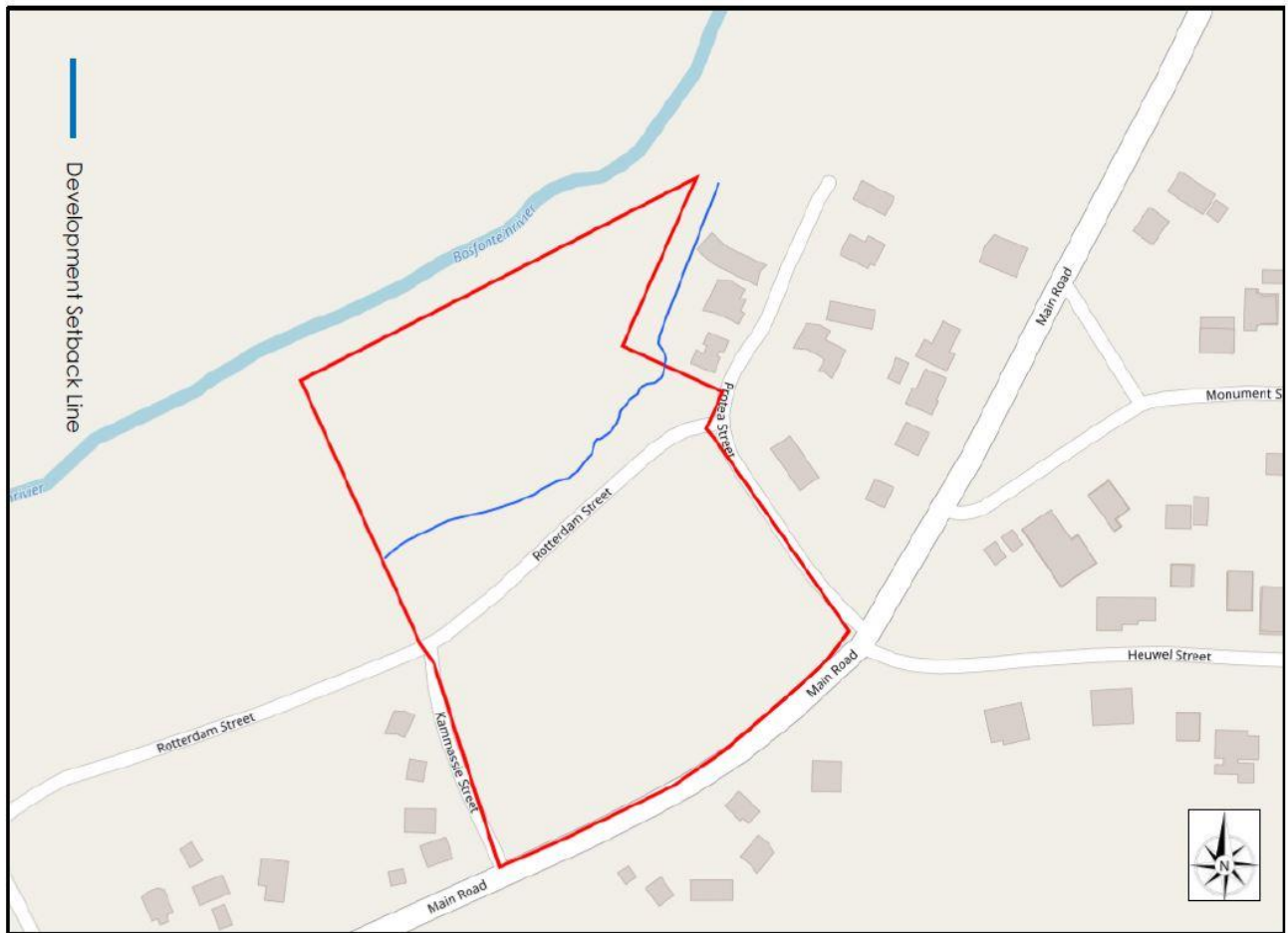
- An internal road network with roads of 10 to 26 meters wide;
- The internal sewer network will consist of 110mm OVC 400kPa pipes connected to each erf;
- The internal water reticulation system will consist of pipes varying in size between 50mm and 75mm diameter;
- Electricity reticulation, substations and street lighting, and;
- Stormwater drainage structures, stormwater pipelines and stormwater outlet structures.

This development must be constructed as depicted on the Site Development Plan compiled by Erik Voigt Architects (Job number 5075-01), Drawing number 01 (CD Rev. No. R09, dated May 2019) as appended to Annexure 2 of the Environmental Authorisation.



**Figure 4: Site Plan.**

The development will be implemented behind the development setback line along the watercourse as shown in the plan in Annexure 3 of the Environmental Authorisation.



**Figure 5: Development Setback.**

The Home Market NPC wishes to amend the Environmental Authorisation (EA) for the Proposed Retirement Village and Service Infrastructure on Erven 103 and 104 and a Portion of Rotterdam Street, Wittedrift, Bitou Municipal Area. Due to delays impacting the start of the construction phase on site, the provided timeframes of implementation as detailed within the EA would now be considered unfeasible. The Applicant therefore wishes to amend the EA to extend the validity period by 5 years (1 November 2027 – 1 November 2032).

**PROPOSED AMENDMENT TO THE ENVIRONMENTAL AUTHORISATION (REF: 16/3/3/1/D1/17/0000/21):**

- Section E: Scope of Validity Period of Authorisation: Page 5:

The section of the EA that reads:

1. This Environmental Authorisation is granted for the period from date of issue until **1 November 2027**, the date on which all the listed activities, including post construction rehabilitation and monitoring requirements, will be deemed to be concluded at the site.

Further to the above, the Environmental Authorisation is subject to the following:

- 1.1. The Holder must start with the physical implementation and exceed the threshold of all the authorised listed activities on the site by **30 June 2026**.
- 1.2. The post construction rehabilitation and monitoring requirements must be finalised at the site within a period of 6-months from the date the construction activities (construction phase) are concluded; but by no later than **30 April 2027**.

Note: The post construction rehabilitation and monitoring requirements should be completed at least six (6) months prior to the expiry of the validity period of an Environmental Authorisation to ensure the Holder is able to comply with the environmental auditing requirements in time.

Failing which this Environmental Authorisation shall lapse, unless the Environmental Authorisation is amended in accordance with the relevant process contemplated in the Environmental Impact Assessment Regulations promulgated under the National Environmental Management Act, 1998 (Act no. 107 of 1998).

Should be amended to read:

1. This Environmental Authorisation is granted for the period from date of issue until **1 November 2032**, the date on which all the listed activities, including post construction rehabilitation and monitoring requirements, will be deemed to be concluded at the site.

Further to the above, the Environmental Authorisation is subject to the following:

- 1.1. The Holder must start with the physical implementation and exceed the threshold of all the authorised listed activities on the site by **30 June 2031**.
- 1.2. The post construction rehabilitation and monitoring requirements must be finalised at the site within a period of 6-months from the date the construction activities (construction phase) are concluded; but by no later than **30 April 2032**.

Note: The post construction rehabilitation and monitoring requirements should be completed at least six (6) months prior to the expiry of the validity period of an Environmental Authorisation to ensure the Holder is able to comply with the environmental auditing requirements in time.

Failing which this Environmental Authorisation shall lapse, unless the Environmental Authorisation is amended in accordance with the relevant process contemplated in the Environmental Impact Assessment Regulations promulgated under the National Environmental Management Act, 1998 (Act no. 107 of 1998).

**PROPOSED CHANGES TO THE ENVIRONMENTAL AUTHORISATION (REF: 16/3/3/1/D1/17/0000/21) DATED 7 OCTOBER 2021:**

The section of the EA that reads:

2. This Environmental Authorisation is granted for the period from date of issue until **1 November 2027**, the date on which all the listed activities, including post construction rehabilitation and monitoring requirements, will be deemed to be concluded at the site.

Further to the above, the Environmental Authorisation is subject to the following:

- 2.1. The Holder must start with the physical implementation and exceed the threshold of all the authorised listed activities on the site by **30 June 2026**.
- 2.2. The post construction rehabilitation and monitoring requirements must be finalised at the site within a period of 6-months from the date the construction activities (construction phase) are concluded; but by no later than **30 April 2027**.

Note: The post construction rehabilitation and monitoring requirements should be completed at least six (6) months prior to the expiry of the validity period of an Environmental Authorisation to ensure the Holder is able to comply with the environmental auditing requirements in time.

Failing which this Environmental Authorisation shall lapse, unless the Environmental Authorisation is amended in accordance with the relevant process contemplated in the Environmental Impact Assessment Regulations promulgated under the National Environmental Management Act, 1998 (Act no. 107 of 1998).

Should be amended to read:

2. This Environmental Authorisation is granted for the period from date of issue until **1 November 2032**, the date on which all the listed activities, including post construction rehabilitation and monitoring requirements, will be deemed to be concluded at the site.

Further to the above, the Environmental Authorisation is subject to the following:

- 2.1. The Holder must start with the physical implementation and exceed the threshold of all the authorised listed activities on the site by **30 June 2031**.
- 2.2. The post construction rehabilitation and monitoring requirements must be finalised at the site within a period of 6-months from the date the construction activities (construction phase) are concluded; but by no later than **30 April 2032**.

Note: The post construction rehabilitation and monitoring requirements should be completed at least six (6) months prior to the expiry of the validity period of an Environmental Authorisation to ensure the Holder is able to comply with the environmental auditing requirements in time.

Failing which this Environmental Authorisation shall lapse, unless the Environmental Authorisation is amended in accordance with the relevant process contemplated in the Environmental Impact Assessment Regulations promulgated under the National Environmental Management Act, 1998 (Act no. 107 of 1998).

The proposed amendment includes an extension of the validity period of the Environmental Authorisation **(EA) by five (5) years.**

In order to assess whether the proposed extension would alter the findings of the original Basic Assessment Report process, all specialists involved in the original assessment were consulted. This included the agricultural specialist, terrestrial biodiversity, plant and animal species specialist, aquatic specialist, and heritage specialist. The specialists were informed of the proposed extension and requested to confirm whether the additional five-year validity period would affect the significance ratings, mitigation measures, or recommendations contained within their original specialist reports. Please refer to Appendix for the specialist reports and their comments on the amendment.

#### **Environmental Compliance Statement:**

The Ecological Compliance Statement for the BAR process for which Environmental Authorisation was granted (EA REF: 16/3/3/1/D1/17/0000/21), was compiled by Mark Berry Environmental Consultants on the 11<sup>th</sup> of June 2021 (Appendix D1).

#### **Original Assessment Findings / Conclusions:**

Given the above evidence, the following compliance statement for indigenous plant and fauna species, and biodiversity in general is presented:

##### **Sensitive fauna species:**

- The site proposed for the development (outside the river corridor and main wetland area) is highly degraded/transformed and considered to be poor habitat for indigenous fauna, except maybe insect fauna. Its position inside an urban context largely surrounded by houses, further supports the statement.
- With regards to the sensitive species listed in the Screening Report, the following: The site falls within the distribution area of the Knysna banana frog (*Afrixalus knysnae*), which is endangered and an inhabitant of temperate forests, fynbos areas and wetlands. Its presence in the larger area is therefore a possibility, but it may be sensitive to disturbed habitats such as this one. Blue duiker (*Philantomba monticola*) has been observed further away to the east, north of Nature's Valley and the N2 in the Garden Route National Park. It is not likely to frequent the site. The site lies outside the normal distribution areas for the other species. *Tetradactylus africanus*, a vulnerable lizard species, is known from Storms River eastwards along the coast. With regards to the two butterfly species, *Aloeides Thyra ssp orientis* is found between Still Bay and Knysna, while *A. pallida ssp junio* is found between Nature's Valley and Kareedouw.
- Given the above, it is recommended that the sensitivity be amended to Low or Low-Medium.

##### **Sensitive plant species:**

- The site proposed for the development (outside the river corridor and main wetland area) is highly degraded/transformed and considered to be of low value (and significance) as a viable habitat for indigenous plant species. No fynbos was recorded on site. It is also unlikely that any species of conservation concern (SCC) will be found on site. Its position inside an urban context largely surrounded by houses, further supports the statement.
- With regards to the sensitive species listed in the Screening Report, the following: *Selago burchellii*, *Erica glandulosa ssp fourcadei*, *E. glumiflora* (sand dunes) and *Lampranthus pauciflorus* are more coastal species. In other words, they are more abundant in habitats

directly adjacent to the shoreline. *Ruschia duthiae* is an endemic vygie found mainly between Wilderness and Knysna. *Pterygodium cleistogamum*, *Acmadenia alternifolia* (recorded on the hilltops west of Wittedrift), *Muraltia knysnaesis* and *Leucospermum glabrum* are fynbos species found on more elevated, hilly areas. The presence of any of these species in the immediate area of the site is unlikely.

- Cognisance must however be taken of the recorded milkwoods and wetland area (on northern side) and planned accordingly. Either the milkwoods must be accommodated inside the development or a permit is needed for its removal.
- Given the above, it is recommended that the sensitivity be amended to Low.

#### Sensitive biodiversity:

- As stated earlier, the site forms part of the larger Plettenberg Bay (Bitou) biodiversity network. It encroaches slightly onto mapped terrestrial CBA, which is probably not correct since the latter comprises an aquatic feature (Bosfontein River). The majority of the site has been mapped as terrestrial ESA. The reasons for this seem unsupported given the transformed state of the largest part of the site (pasture). Outside the riverine and wetland area virtually no natural elements remain. The biodiversity (CBA) component of the site is therefore regarded as low to medium sensitive.
- The wetland area must be suitably buffered and rehabilitated (cleared of invasive aliens). The treatment of stormwater runoff from the development into the wetland / riverine area will also require attention.
- I am not sure why this is referred to 'biodiversity' as the definition of biodiversity refers to the sum of all living animals and plants. If it refers to the biodiversity (CBA) network map, it should be referred to that specifically.
- Given the above, it is recommended that the sensitivity be amended to Low or Low-medium.

#### Recommendations/conditions:

As noted above, cognisance must be taken of the recorded milkwoods and wetland area (on northern side) and planned accordingly. Either the milkwoods must be accommodated inside the development or a permit is needed for its removal. There is no need for monitoring of the impact of the development on terrestrial biodiversity, or any other conditions.

#### **Amendment Findings / Conclusions:**

Dr. Mark Berry was contacted regarding his Ecological Compliance Statement Report (Appendix D1), and the scope of the proposed amendment was explained to him. Mark Berry confirmed that extending the validity period of the EA by 5 years will not alter the findings and conclusions of his original assessment because the layout for the proposal remains the same.

## Impacts:

**Table 2: Findings and Conclusions of the Ecological Compliance Statement:**

| Findings and Conclusions of Original Ecological Compliance Statement:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Findings and Conclusions of Amendment: |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|
| <p>Sensitive fauna species:</p> <ul style="list-style-type: none"> <li>The site proposed for the development (outside the river corridor and main wetland area) is highly degraded/transformed and considered to be poor habitat for indigenous fauna, except maybe insect fauna. Its position inside an urban context largely surrounded by houses, further supports the statement.</li> <li>With regards to the sensitive species listed in the Screening Report, the following: The site falls within the distribution area of the Knysna banana frog (<i>Arixalus knysnae</i>), which is endangered and an inhabitant of temperate forests, fynbos areas and wetlands. Its presence in the larger area is therefore a possibility, but it may be sensitive to disturbed habitats such as this one. Blue duiker (<i>Philantomba monticola</i>) has been observed further away to the east, north of Nature's Valley and the N2 in the Garden Route National Park. It is not likely to frequent the site. The site lies outside the normal distribution areas for the other species. <i>Tetradactylus africanus</i>, a vulnerable lizard species, is known from Storms River eastwards along the coast. With regards to the two butterfly species, <i>Aloeides Thyra ssp orientis</i> is found between Still Bay and Knysna, while <i>A. pallida ssp juno</i> is found between Nature's Valley and Kareedouw.</li> <li>Given the above, it is recommended that the sensitivity be amended to Low or Low-Medium.</li> </ul>                                                                                                                | <p><b>NO CHANGE</b></p>                |
| <p>Sensitive plant species:</p> <ul style="list-style-type: none"> <li>The site proposed for the development (outside the river corridor and main wetland area) is highly degraded/transformed and considered to be of low value (and significance) as a viable habitat for indigenous plant species. No fynbos was recorded on site. It is also unlikely that any species of conservation concern (SCC) will be found on site. Its position inside an urban context largely surrounded by houses, further supports the statement.</li> <li>With regards to the sensitive species listed in the Screening Report, the following: <i>Selago burchellii</i>, <i>Erica glandulosa ssp fourcadei</i>, <i>E. glumiflora</i> (sand dunes) and <i>Lampranthus pauciflorus</i> are more coastal species. In other words, they are more abundant in habitats directly adjacent to the shoreline. <i>Ruschia duthiae</i> is an endemic vygie found mainly between Wilderness and Knysna. <i>Pterygodium cleistogamum</i>, <i>Acmadenia alternifolia</i> (recorded on the hilltops west of Wittedrift), <i>Muraltia knysnaesis</i> and <i>Leucospermum glabrum</i> are fynbos species found on more elevated, hilly areas. The presence of any of these species in the immediate area of the site is unlikely.</li> <li>Cognisance must however be taken of the recorded milkwoods and wetland area (on northern side) and planned accordingly. Either the milkwoods must be accommodated inside the development or a permit is needed for its removal.</li> <li>Given the above, it is recommended that the sensitivity be amended to Low.</li> </ul> | <p><b>NO CHANGE</b></p>                |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                         |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| <p>Sensitive biodiversity:</p> <ul style="list-style-type: none"> <li>As stated earlier, the site forms part of the larger Plettenberg Bay (Bitou) biodiversity network. It encroaches slightly onto mapped terrestrial CBA, which is probably not correct since the latter comprises an aquatic feature (Bosfontein River). The majority of the site has been mapped as terrestrial ESA. The reasons for this seem unsupported given the transformed state of the largest part of the site (pasture). Outside the riverine and wetland area virtually no natural elements remain. The biodiversity (CBA) component of the site is therefore regarded as low to medium sensitive.</li> <li>The wetland area must be suitably buffered and rehabilitated (cleared of invasive aliens). The treatment of stormwater runoff from the development into the wetland / riverine area will also require attention.</li> <li>I am not sure why this is referred to 'biodiversity' as the definition of biodiversity refers to the sum of all living animals and plants. If it refers to the biodiversity (CBA) network map, it should be referred to that specifically.</li> <li>Given the above, it is recommended that the sensitivity be amended to Low or Low-medium.</li> </ul> | <p><b>NO CHANGE</b></p> |
| <p>Dr. Mark Berry was contacted regarding his Ecological Compliance Statement Report (Appendix D1), and the scope of the proposed amendment was explained to him. Mark Berry confirmed that extending the validity period of the EA by 5 years will not alter the findings and conclusions of his original assessment because the layout for the proposal remains the same.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p><b>NO CHANGE</b></p> |

#### **Advantages:**

- The layout remains the same, therefore the site will remain outside of the river corridor and main wetland area.
- The development will still occur in an area classed as highly degraded/transformed and considered to be of low value (and significance) as a viable habitat for indigenous plant species and fauna species, and biodiversity in general.
- No fynbos was recorded on site.
- Unlikely that any species of conservation concern (SCC) will be found on the site due to its position inside an urban context, which will remain the same.

#### **Disadvantages:**

- None identified.

#### **Agricultural Compliance Statement:**

The Agricultural Compliance Statement for the BAR process for which Environmental Authorisation was granted (EA REF: 16/3/3/1/D1/17/0000/21), was compiled by Mr. Johan Lantz on the 13<sup>th</sup> of March 2021 (Appendix D2).

#### **Original Assessment Findings / Conclusions:**

- It is hereby confirmed that the site is of medium and low sensitivity for agriculture, because the dominant soils are shallow, duplex soils, that are depth-limited by a dense clay subsoil horizon, with the result that the land capability rating is medium to low. The site is not used for productive

agriculture and its location between residential areas, is a further limitation to its potential agriculture use.

- It is furthermore confirmed that, because of the limits to agricultural potential and use, the proposed development will not have an unacceptable negative impact on the agricultural production capability of the site. Therefore, from an agricultural impact point of view, it is recommended that the development be approved.
- The entire site will be excluded from agricultural use. Therefore, the protocol requirement of confirmation that all reasonable measures have been taken through micro-siting to avoid or minimise fragmentation and disturbance of agricultural activities, is not relevant in this case. For the same reason, there are no Environmental Management Programme inputs required for the protection of agricultural potential on site.
- The conclusion of this assessment on the acceptability of the proposed development and the recommendation for its approval is not subject to any conditions. In completing this statement, no assumptions have been made and there are no uncertainties or gaps in knowledge or data that are relevant to it. No further agricultural assessment of any kind is required for this application.

### **Amendment Findings / Conclusions:**

Mr. Johann Lantz was contacted regarding his Agricultural Compliance Statement Report (Appendix D2), and the scope of the proposed amendment was explained to him. Johan Lantz confirmed that his original assessment remains valid and that the extension of the implementation period of the EA will not have any impact on his report's findings or conclusions.

### **Impacts:**

**Table 3: Findings and Conclusions of the Agricultural Compliance Statement:**

| <b>Findings and Conclusions of Original Agricultural Compliance Statement:</b>                                                                                                                                                                                                                                                                                                                                                        | <b>Findings and Conclusions of Amendment:</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| It is hereby confirmed that the site is of medium and low sensitivity for agriculture, because the dominant soils are shallow, duplex soils, that are depth-limited by a dense clay subsoil horizon, with the result that the land capability rating is medium to low. The site is not used for productive agriculture and its location between residential areas, is a further limitation to its potential agriculture use.          | <b>NO CHANGE</b>                              |
| It is furthermore confirmed that, because of the limits to agricultural potential and use, the proposed development will not have an unacceptable negative impact on the agricultural production capability of the site. Therefore, from an agricultural impact point of view, it is recommended that the development be approved.                                                                                                    | <b>NO CHANGE</b>                              |
| The entire site will be excluded from agricultural use. Therefore, the protocol requirement of confirmation that all reasonable measures have been taken through micro-siting to avoid or minimise fragmentation and disturbance of agricultural activities, is not relevant in this case. For the same reason, there are no Environmental Management Programme inputs required for the protection of agricultural potential on site. | <b>NO CHANGE</b>                              |
| The conclusion of this assessment on the acceptability of the proposed development and the recommendation for its approval is not subject to any conditions. In completing this statement, no assumptions have been made and there are no uncertainties or gaps in knowledge or data that are relevant to it. No further agricultural assessment of any kind is required for this application.                                        | <b>NO CHANGE</b>                              |

**Advantages:**

- The site is not used for productive agriculture and its location between residential areas is a further limitation to its potential for agricultural use.
- The proposed development will not have an unacceptable negative impact on the agricultural production capability of the site and it was recommended that the development be approved – this will remain the same under the proposed amendment.
- No further agricultural assessment of any kind is required for this application – as confirmed by the specialist.

**Disadvantages:**

- None identified.

**Aquatic Habitat Impact Assessment:**

The Aquatic Habitat Impact Assessment for the BAR process for which Environmental Authorisation was granted (EA REF: 16/3/3/1/D1/17/0000/21), was compiled by Mrs. Debbie Fordham, dated May 2020 (Appendix D3).

**Original Assessment Findings / Conclusions:**

The proposed development of Erf 103 and 104, Wittedrift will impact on the Bosfontein River wetland that is situated north of the proposed development area. The wetland habitat is degraded due to various impacts within the catchment such as from agriculture, forestry and urban development. The wetland received a 'D' PES score, indicating a Poor system. However, this is an indication of the health of the whole reach of natural wetland adjacent to the development. The fragment of wetland habitat remaining is in better health with dense vegetation cover and no signs of erosion. The wetland's functional importance is highlighted in its ability to attenuate floods, trap sediment and control erosion. It is recommended that the wetland be maintained in its current state which will allow it to perform valuable ecosystem services.

There are two proposed development layouts, Alternative A and Alternative B, that were assessed in this report. Alternative A is the original layout where development encroaches significantly into aquatic habitat on the eastern side of the development. Alternative B is the amended layout that considers the 10m aquatic buffer. Although some infrastructure still slightly encroaches into the buffer, it is unlikely to cause high impacts to the aquatic habitat. It is however still recommended that infrastructure be set back to be completely outside the buffer.

The proposed development activities will trigger a water use licence in terms of Section 21 (c) and (i) of the National Water Act (Act 36 of 1998). It is recommended that a water use application for this proposed development be submitted to the Breede Gouritz Catchment Management Agency.

**Amendment Findings / Conclusions:**

Mrs Debbie Fordham confirmed that her original Aquatic Habitat Impact Assessment (Appendix D3) remains generally applicable and that the proposed extension of the Environmental Authorisation implementation period does not alter the findings or conclusions of the original assessment.

During the review, Mrs Fordham also identified apparent inconsistencies between the stormwater management information provided and the assumptions on which her original assessment was based.

She advised that, should the assessed layout have changed, an amendment to the Water Use Authorisation (WULA) issued by the Breede-Olifants Catchment Management Agency (BOCMA) may be required. Clarification was provided that the proposed Part 2 Amendment relates solely to an extension of the Environmental Authorisation implementation period and does not include any changes to the approved development footprint, layout or associated infrastructure.

Confirmation of the layout drawings submitted to BOCMA was requested to Mrs Debbie Fordham and no response was received. The available Phase 3 Water Use Authorisation submission documentation was reviewed and Figure 1 within Appendix D7 confirms that the Master Layout Plan formed part of the Phase 3 WUA submission, while Figure 2 within Appendix D7 reproduces the layout plan submitted to BOCMA.

Based on this review, the layout submitted as part of the Phase 3 Water Use Authorisation application corresponds with the layout approved under Environmental Authorisation (DEA&DP Ref. 16/3/3/1/D1/17/0000/21). Accordingly, no evidence was identified to indicate that an alternative development layout had been submitted to BOCMA, and the specialist's confirmation that the implementation period extension does not alter the findings or conclusions of the original assessment remains applicable.

#### Impacts:

**Table 4: Impact Significance of the Aquatic Habitat Impact Assessment:**

| Impacts                                              | Original Assessment Impact Significance | Amendment Impact Significance                       |
|------------------------------------------------------|-----------------------------------------|-----------------------------------------------------|
| <b>CONSTRUCTION PHASE</b>                            |                                         |                                                     |
| Loss and disturbance of aquatic vegetation & habitat | Low (18)                                | Low (18)<br><b>NO CHANGE IN IMPACT SIGNIFICANCE</b> |
| Erosion & sedimentation                              | Low (21)                                | Low (21)<br><b>NO CHANGE IN IMPACT SIGNIFICANCE</b> |
| Water Pollution                                      | Low (15)                                | Low (15)<br><b>NO CHANGE IN IMPACT SIGNIFICANCE</b> |
| Flow modification                                    | Low (27)                                | Low (27)<br><b>NO CHANGE IN IMPACT SIGNIFICANCE</b> |
| <b>OPERATIONAL PHASE</b>                             |                                         |                                                     |
| Loss and disturbance of aquatic vegetation & habitat | Low (24)                                | Low (24)<br><b>NO CHANGE IN IMPACT SIGNIFICANCE</b> |
| Erosion & sedimentation                              | Low (16)                                | Low (16)<br><b>NO CHANGE IN IMPACT SIGNIFICANCE</b> |
| Water Pollution                                      | Low (24)                                | Low (24)<br><b>NO CHANGE IN IMPACT SIGNIFICANCE</b> |

|                   |          |                                         |
|-------------------|----------|-----------------------------------------|
|                   |          | <b>SIGNIFICANCE</b>                     |
| Flow modification | Low (24) | Low (24)                                |
|                   |          | <b>NO CHANGE IN IMPACT SIGNIFICANCE</b> |

**Advantages:**

- Impacts to the aquatic environment will remain the same as confirmed by the aquatic specialist, no change in impact significance will occur with the proposed amendment.

**Disadvantages:**

- None identified.

**Heritage Impact Assessment:**

The original Heritage Impact Assessment (HIA), prepared in support of the Basic Assessment process for which Environmental Authorisation (EA Ref: 16/3/3/1/D1/17/0000/21) was granted, comprised the following:

- Heritage Impact Assessment (Appendix D4)
- Addendum to the Heritage Impact Assessment, prepared by Lize Malan (Lize Malan Planner and Heritage Consultant) (Appendix D5)

Please note that due to the nature of the amendment being an extension of the validity period of the EA, there will be no effect on the heritage component of the original assessment. HWC will be consulted regarding the ROD for the BAR process during the Public Participation Process of the Draft Environmental Impact Report, and their comments will be included in the Final Environmental Impact Report.

**Original Assessment Findings / Conclusions:**

The Heritage Impact Assessment (HIA) concluded that:

- The specialist reports all support the development proposal, with some mitigating requirements.
- The proposal fulfils a niche in the marketplace according to the expectations of the Bitou SDF and IDP.
- The development proposal is not in conflict with any of the relevant spatial planning parameters, nor will it place any burden on the local authority.
- The proposed development has overwhelming benefits to the local community and the local economy in a short, medium and long term.
- There are no negative visual impacts on the cultural landscape and heritage resources identified in the area.
- The development proposal has taken cognizance of the heritage principles and adopted the mitigation recommendations in the revised proposal.
- We are therefore of the opinion that it would be in the best interest of all interested and affected parties for this project to proceed as proposed, and to fill the gap in the marketplace for affordable housing for the retired community.

The Heritage Impact Assessment proposed the following integrated set of recommendations:

- The proposed consolidation and re-zoning of the Erven in the application and submission process (which have been motivated in terms of the local by-laws and in accordance with the requirements of the Bitou SDF, SPLUMA and LUPA), is to proceed, as it also conforms to the appropriate heritage principles identified in this report.
- As the VIA confirms that there is little to no negative visual impact on the cultural landscape, it is recommended that the application is to proceed with the mitigating processes already adopted in the proposal.

- The specialist reports indicate how the proposed development is to be integrated and rolled out through planning, construction and post-construction phases which will assure a sustainable project.
- The Heritage Resources in Wittedrift (as identified in the report) will not be negatively impacted upon by the proposed development, as all the necessary mitigation proposals have been adopted in a revised proposal. It is thereby recommended that the project is to proceed accordingly.
- Architectural Design Guidelines with heritage principles have been drawn up to assure that the proposed development is sensitively co-ordinated into the urban landscape.
- Noise and dust is to be controlled through the introduction of appropriate mitigation measures as spelt out in the specialist report.
- The existing line of Oak trees along the Main Road, which will play an important role in softening the edge of the development along the Main Road, is to be protected during the construction phase, as spelt out in the specialist report.

The Addendum to the Heritage Impact assessment and other submissions to HWC had the following conclusions:

- The above report illustrates the dearth of heritage resources in the vicinity of the proposed development site and the very limited if any inherent significance of the site itself. The only resource on site is the remaining historic seven oak trees along Main Road, which will be retained as part of the proposed development. Although the proposed development is of a higher density than its surrounds, this will not impact on any heritage resources in its context or even the larger Wittedrift area.
- It is my contention that IACom's request for a redesign which considers aspects such as rural placemaking criteria is not warranted in this instance. As noted in the introduction, the stance taken by IACom is understandable as the heritage significance (or lack thereof) of the site and its context was not clearly presented in any of the submissions made to HWC. It is also noted that the original HIA was advertised, no objections were received and it is understood that there is community support for a retirement facility in Wittedrift.

The Addendum to the Heritage Impact assessment and other submissions to HWC had the following recommendations:

- IACom acknowledges the findings this report
- Concludes that the earlier submissions, with this additional report, now meets the requirements of Section 38 (3) of the NHRA
- The proposed development as presented in Drawing no. 5075-01/01(CD)/R09, by Erik Voigt Architects is approved

The Heritage Impact Assessment and the Addendum to the Heritage Impact Assessment were discussed at the Impact Assessment Committee (IACom) meeting held on 19 May 2021. The Committee resolved to endorse the addendum to the HIA prepared by Lize Malan as meeting the requirements of S38(3) of the NHRA. As presented in Drawing no. 5075-01/01(CD)/R09, by Erik Voigt Architects is approved (Please refer to Appendix D6 for the HWC ROD).

#### **Amendment Findings / Conclusions:**

As the current amendment relates solely to the extension of the validity period of the Environmental Authorisation and does not introduce any physical changes to the approved development, no additional impacts on heritage resources are anticipated.

Stephanie-Anne Barnardt of Heritage Western Cape (HWC) will be consulted regarding the applicability of the Heritage Western Cape Record of Decision (ROD) to the proposed Part 2 Amendment during the Public Participation Process of the Draft Environmental Impact Report. Comments from HWC regarding this matter will be included in the Final Environmental Impact Report

**Table 5: Impact Significance of the Heritage Impact Assessment**

| Findings and Conclusions of Original Heritage Impact Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Findings and Conclusions of Amendment: |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|
| Heritage Impact Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                        |
| <p>The Heritage Impact Assessment (HIA) concluded that:</p> <ul style="list-style-type: none"> <li>• The specialist reports all support the development proposal, with some mitigating requirements.</li> <li>• The proposal fulfils a niche in the marketplace according to the expectations of the Bitou SDF and IDP.</li> <li>• The development proposal is not in conflict with any of the relevant spatial planning parameters, nor will it place any burden on the local authority.</li> <li>• The proposed development has overwhelming benefits to the local community and the local economy in a short, medium and long term.</li> <li>• There are no negative visual impacts on the cultural landscape and heritage resources identified in the area.</li> <li>• The development proposal has taken cognizance of the heritage principles and adopted the mitigation recommendations in the revised proposal.</li> <li>• We are therefore of the opinion that it would be in the best interest of all interested and affected parties for this project to proceed as proposed, and to fill the gap in the marketplace for affordable housing for the retired community.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>NO CHANGE</b>                       |
| <p>The Heritage Impact Assessment proposed the following integrated set of recommendations:</p> <ul style="list-style-type: none"> <li>• The proposed consolidation and re-zoning of the Erven in the application and submission process (which have been motivated in terms of the local by-laws and in accordance with the requirements of the Bitou SDF, SPLUMA and LUPA), is to proceed, as it also conforms to the appropriate heritage principles identified in this report.</li> <li>• As the VIA confirms that there is little to no negative visual impact on the cultural landscape, it is recommended that the application is to proceed with the mitigating processes already adopted in the proposal.</li> <li>• The specialist reports indicate how the proposed development is to be integrated and rolled out through planning, construction and post-construction phases which will assure a sustainable project.</li> <li>• The Heritage Resources in Wittedrift (as identified in the report) will not be negatively impacted upon by the proposed development, as all the necessary mitigation proposals have been adopted in a revised proposal. It is thereby recommended that the project is to proceed accordingly.</li> <li>• Architectural Design Guidelines with heritage principles have been drawn up to assure that the proposed development is sensitively co-ordinated into the urban landscape.</li> <li>• Noise and dust is to be controlled through the introduction of appropriate mitigation measures as spelt out in the specialist report.</li> <li>• The existing line of Oak trees along the Main Road, which will play an important role in softening the edge of the development along the</li> </ul> | <b>NO CHANGE</b>                       |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| Main Road, is to be protected during the construction phase, as spelt out in the specialist report.                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                  |
| <b>Addendum to the HIA</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                  |
| The above report illustrates the dearth of heritage resources in the vicinity of the proposed development site and the very limited if any inherent significance of the site itself. The only resource on site is the remaining historic seven oak trees along Main Road, which will be retained as part of the proposed development. Although the proposed development is of a higher density than its surrounds, this will not impact on any heritage resources in its context or even the larger Wittedrift area.                                         | <b>NO CHANGE</b> |
| It is my contention that IACom's request for a redesign which considers aspects such as rural placemaking criteria is not warranted in this instance. As noted in the introduction, the stance taken by IACom is understandable as the heritage significance (or lack thereof) of the site and its context was not clearly presented in any of the submissions made to HWC. It is also noted that the original HIA was advertised, no objections were received and it is understood that there is community support for a retirement facility in Wittedrift. | <b>NO CHANGE</b> |
| It is thus recommended that: <ul style="list-style-type: none"> <li>• IACom acknowledges the findings this report</li> <li>• Concludes that the earlier submissions, with this additional report, now meets the requirements of Section 38 (3) of the NHRA</li> <li>• The proposed development as presented in Drawing no. 5075-01/01(CD)/R09, by Erik Voigt Architects is approved</li> </ul>                                                                                                                                                               | <b>NO CHANGE</b> |

#### Advantages

- No additional impacts on heritage resources will result, as the approved development footprint and design remain unchanged.
- The approved heritage findings and recommendations remain valid and applicable.

#### Disadvantages

- No additional disadvantages to heritage resources are anticipated, as the proposed amendment does not alter the nature, extent or location of the approved development.

|          |                                              |
|----------|----------------------------------------------|
| Section  | <b>MOTIVATION FOR THE PROPOSED AMENDMENT</b> |
| <b>7</b> |                                              |

The Environmental Authorisation (EA REF: 16/3/3/1/D1/17/0000/21) for the proposed development was granted on 7 October 2021. However, due to circumstances beyond the control of the Holder of the EA, the prescribed validity period for the commencement and completion of the authorised activities has become unfeasible. Consequently, it is requested that the validity period contained within the EA be extended by five (5) years, from 1 November 2027 to 1 November 2032.

Following the issuance of the EA, the Holder of the EA was required to finalise the Site Development Plan (SDP), including the detailed stormwater management infrastructure, in consultation with the Bitou Local Municipality. Although these processes commenced shortly after the EA was issued, the Site Development Plan was only approved by the Bitou Local Municipality on 22 July 2025. This extended municipal approval process significantly delayed the implementation programme and prevented the commencement of construction activities within the original validity period of the EA. Furthermore, the transfer of Erf 421, which is essential for the implementation of the development, has also experienced unforeseen delays.

These delays were outside the control of the Holder of the EA and constituted significant barriers to the commencement of construction. As a result, the validity periods prescribed in the EA can no longer reasonably be achieved despite the continued intention to implement the authorised development.

All biodiversity specialists involved in the original Basic Assessment process have been consulted and have confirmed that there are no changes to the findings and recommendations of their original assessment findings and conclusions.

The requested extension will therefore enable the Holder of the EA to implement the already authorised development while ensuring that all conditions of the EA continue to be complied with. Given that the delays were largely attributable to municipal approval processes and property transfer matters, and not to any action or omission by the Holder of the EA, there is sufficient justification for extending the validity periods by five years

|          |                                                    |
|----------|----------------------------------------------------|
| Section  | <b>SUMMARY OF THE PUBLIC PARTICIPATION PROCESS</b> |
| <b>8</b> |                                                    |

Two site notices will be erected on the property. Site Notice 1 will be positioned at the main point of access to the site from Protea Street, ensuring visibility to passing traffic and adjacent road users. Site Notice 2 will be installed along the site boundary facing the main road.

In addition to on-site notices, a public advert will be published in a local newspaper, the Knysna-Plett Herald, informing the public of the availability of the Report for review and inviting comments within the stipulated commenting period.

To further enhance accessibility and reach, notifications regarding the availability of the Impact Report will also be circulated via SES cc website. All previously registered Interested and Affected Parties, including state departments will be formally notified via email (where email addresses were obtained in the previous assessment). In addition, letter drops will be done for all adjacent landowners to identify any new potential Interested and Affected Parties. These notifications will include details on how to access the report and submit comments.

All comments received during the Public Participation Process will be included under Appendix G of the Final Impact Report.

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

The availability of the draft Impact Report along with the supporting documentation on the SES website ([www.sescc.net](http://www.sescc.net)), under the Public Documents section.

|         |                   |
|---------|-------------------|
| Section |                   |
| 9       | <b>CONCLUSION</b> |

In terms of the biophysical environment, the proposed amendments are regarded as insignificant as none of the proposed changes invoke any impact significance increases to the environment. The proposed footprint of the development will also not be expanded, and will stay within the confines of the original assessment. As such we believe that the proposed amendments to the EA and should be approved.