LORNAY
ENVIRONMENTAL CONSULTING

Final Basic Assessment Report

Residential Development Erf 1446, Vermont

08 July 2024

Consultant:
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BASIC ASSESSMENT REPORT

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

NOVEMBER 2019

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

GENERAL PROJECT DESCRIPTION

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

PROPOSED REZONING AND SUBDIVISION TO CREATE SINGLE RESIDENTIAL ERVEN ON ERF 1446, VERMONT, OVERSTRAND MUNICIPALITY

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

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

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

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

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

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

6. This BAR is current as of **November 2019**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at http://www.westerncape.gov.za/eadp to check for the latest version of this BAR.

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

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

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

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

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

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

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

14. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA"), the submission of the Report must also be made as follows, for-
Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

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

DEPARTMENTAL DETAILS

CAPE TOWN OFFICE: REGION 1 and REGION 2 **(Region 1: City of Cape Town, West Coast District)** **(Region 2: Cape Winelands District & Overberg District)**	**GEORGE OFFICE: REGION 3** **(Central Karoo District & Garden Route District)**
BAR must be sent to the following details: Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1 or 2) Private Bag X 9086 Cape Town, 8000 Registry Office 1st Floor Utilitas Building 1 Dorp Street, Cape Town Queries should be directed to the Directorate: Development Management (Region 1 and 2) at: Tel: (021) 483-5829 Fax (021) 483-4372	BAR must be sent to the following details: Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530 Registry Office 4th Floor, York Park Building 93 York Street George Queries should be directed to the Directorate: Development Management (Region 3) at: Tel: (044) 805-8600 Fax (044) 805 8650

MAPS

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

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

ACRONYMS

DAFF:	Department of Forestry and Fisheries
DEA:	Department of Environmental Affairs
DEA& DP:	Department of Environmental Affairs and Development Planning
DHS:	Department of Human Settlement
DoA:	Department of Agriculture
DoH:	Department of Health
DWS:	Department of Water and Sanitation
EMPr:	Environmental Management Programme

HWC:	Heritage Western Cape
NFEPA:	National Freshwater Ecosystem Protection Assessment
NSBA:	National Spatial Biodiversity Assessment
TOR:	Terms of Reference
WCBSP:	Western Cape Biodiversity Spatial Plan
WCG:	Western Cape Government

ATTACHMENTS

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

The following checklist of attachments must be completed.

APPENDIX			**✓ (Tick) or x (cross)**
Appendix A:	**Maps**		
	Appendix A:	**Locality Map**	✓
	Appendix A2:	**Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning18**	N/A
	Appendix A3:	**Map with the GPS co-ordinates for linear activities**	N/A
Appendix B:	**Appendix B:**	**Site development plan(s)**	✓
	Appendix B2	**A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;**	-
Appendix C:	**Photographs**		✓
Appendix D:	**Biodiversity overlay map**		✓
Appendix E:	**Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.**		
	Appendix E:	**Final comment/ROD from HWC**	✓
	Appendix E3:	**Final Comment from the DWS**	N/A
	Appendix E4:	**Comment from the DEA: Oceans and Coast**	N/A
	Appendix E5:	**Comment from the DAFF**	N/A
	Appendix E6:	**Comment from WCG: Transport and Public Works**	N/A
	Appendix E7:	**Comment from WCG: DoA**	N/A

	Appendix E8:	**Comment from WCG: DHS**	N/A
	Appendix E9:	**Comment from WCG: DoH**	N/A
	Appendix E10:	**Comment from DEA&DP: Pollution Management**	N/A
	Appendix E11:	**Comment from DEA&DP: Waste Management**	N/A
	Appendix E12:	**Comment from DEA&DP: Biodiversity**	N/A
	Appendix E13:	**Comment from DEA&DP: Air Quality**	N/A
	Appendix E14:	**Comment from DEA&DP: Coastal Management**	N/A
	Appendix E15:	**Comment from the local authority**	N/A
	Appendix E17:	**Comment from the District Municipality**	N/A
	Appendix E18:	**Copy of an exemption notice**	N/A
	Appendix E19	**Pre-approval for the reclamation of land**	N/A
	Appendix E20:	**Proof of agreement/TOR of the specialist studies conducted.**	N/A
	Appendix E21:	**Proof of land use rights**	N/A
	Appendix E22:	**Proof of public participation agreement for linear activities**	N/A
Appendix F:	**Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.** **Appendix F1 : Copy of comment from Cape Nature** **Appendix F2: Copy of comment from DEA&DP** **Appendix F3: Proof of Public Participation**		✓
Appendix G:	**Specialist Report(s)** **Appendix G1: Botanical Specialist** **Appendix G2: Confirmation of all services (water, electricity, sewage, solid waste management)**		✓
Appendix H:	**EMPr**		✓
Appendix I:	**Screening tool report**		✓

Appendix :	**The impact and risk assessment for each alternative**	N/A
Appendix J:	**Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline**	✓
Appendix…..	**Any other attachments must be included as subsequent appendices**	

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE:		GEORGE OFFICE:
	REGION 1 (City of Cape Town, West Coast District	REGION 2 (Cape Winelands District & Overberg District)	REGION 3 (Central Karoo District & Garden Route District)

Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	JP van Gemert Testamentary Trust	
Name of contact person for Applicant/Proponent (if other):	Kathryn McMahon	
Company/ Trading name/State Department/Organ of State:	IT11507/2010	
Company Registration Number:		
Postal address:	18 Fulmar Street	
	Vermont, Hermanus	Postal code: 7200
Telephone:	-	Cell: 084 556 6644
E-mail:	Kathrynmcmahon7@icloud.com	Fax: -
Company of EAP:	Lornay Environmental Consulting	
EAP name:	Michelle Naylor	
Postal address:	PO Box 1990	
	Hermanus	Postal code: 7200
Telephone:		Cell: 083 245 6556
E-mail:	michelle@lornay.co.za	Fax: ( )
Qualifications:	Master of Science (Rhodes University)	
EAPASA registration no:	EAPASA.2019/698,., SACNASP., IAIASA	
Duplicate this section where there is more than one landowner Name of landowner:	As above	
Name of contact person for landowner (if other):		
Postal address:		
		Postal code:
Telephone:	( )	Cell:
E-mail:		Fax: ( )
Name of Person in control of the land:	As above	
Name of contact person for person in control of the land:		
Postal address:		
		Postal code:
Telephone:	( )	Cell:
E-mail:		Fax: ( )

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	Overstrand Municipality	
Contact person:	Penelope Aplon	
Postal address:	Magnolia Street	
	Hermanus	Postal code: 7200

Telephone	028 313 8000	Cell:
E-mail:	paplon@overstrand.gov.za	Fax: ( )

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

1.	Is the proposed development (please tick):	New	✓	Expansion	

2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.			
The site is currently vacant, with natural vegetation. The site is characterized by dense alien vegetation. The site is located within the built-up urban edge of the suburb of Vermont, Hermanus, and is surrounded by other residential-type development.				
~~3.~~	~~**For Linear activities or developments**~~			
~~3.1.~~	~~Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:~~			
3.2.	~~Development footprint of the proposed development for all alternatives.~~	~~m²~~		
3.3.	~~Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.~~			
~~3.4.~~	~~Indicate how access to the proposed routes will be obtained for all alternatives.~~			
~~3.5. SG CODE~~				
3.6.	~~**Starting point co-ordinates for all alternatives**~~			
	~~Latitude (S)~~	~~º~~	~~‘~~	~~“~~
	~~Longitude (E)~~	~~º~~	~~‘~~	~~“~~
	~~**Middle-point co-ordinates for all alternatives**~~			
	~~Latitude (S)~~	~~º~~	~~‘~~	~~“~~
	~~Longitude (E)~~	~~º~~	~~‘~~	~~“~~
	~~**End point co-ordinates for all alternatives**~~			
	~~Latitude (S)~~	~~º~~	~~‘~~	~~“~~
	~~Longitude (E)~~	~~º~~	~~‘~~	~~“~~
~~**Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.**~~				

4.	**Other developments**	
4.1.	Property size(s) of all proposed site(s):	21558 m^2
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable): The site is currently undeveloped and does not contain any existing facilities or associated infrastructure.	0 m^2
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives: The development footprint of the proposed development is 21,578 square meters in total.	The development of the site is to create 35 residential erven 21558 m^2

5.2 Subdivision Plan
Erf 1446 - Vermont

1	600m²	Single Residential
2	600m²	Single Residential
3	600m²	Single Residential
4	600m²	Single Residential
5	600m²	Single Residential
6	600m²	Single Residential
7	605m²	Single Residential
8	604m²	Single Residential
9	601m²	Single Residential
10	605m²	Single Residential
11	606m²	Single Residential
12	621m²	Single Residential
13	600m²	Single Residential
14	697m²	Single Residential
15	621m²	Single Residential
16	621m²	Single Residential
17	626m²	Single Residential
18	605m²	Single Residential
19	600m²	Single Residential
20	363m²	General Residential
21	382m²	General Residential
22	350m²	General Residential
23	374m²	General Residential
24	358m²	General Residential
25	362m²	General Residential
26	432m²	General Residential
27	355m²	General Residential
28	350m²	General Residential
29	350m²	General Residential
30	354m²	General Residential
31	356m²	General Residential
32	483m²	General Residential
33	366m²	General Residential
34	1081m²	Public Open Space
35	3650m²	Public Road

Plan date: 29/01/2024

Plan Number: 23.129 (005) - Plan 5.2

Plan prepared by: Thian Jansen

All distances are approximate and subject to a survey

Tel: 028 313 1411

Email: admin@wrapgroup.co.za

Unit B, Standard House,
Corner of Royal and Dirkie Uys
Street Hermanus, 7200

WRAP Project Office
Town Planning & Project Management

4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).

The subdivision of the property to create residential erven, it is proposed as follows:

- Erven 1 to 19 = Residential Zone 1: Single Residential
- Erven 20 to 33 = General Residential Zone 1: Town Housing
- Erven 34 = Open Space Zone 2: Public Open Space: This erf will be used for public open space, such as a park or playground.
- Erven 35 = Transport Zone 2: Road and Parking: This erf will be used for a road and parking.

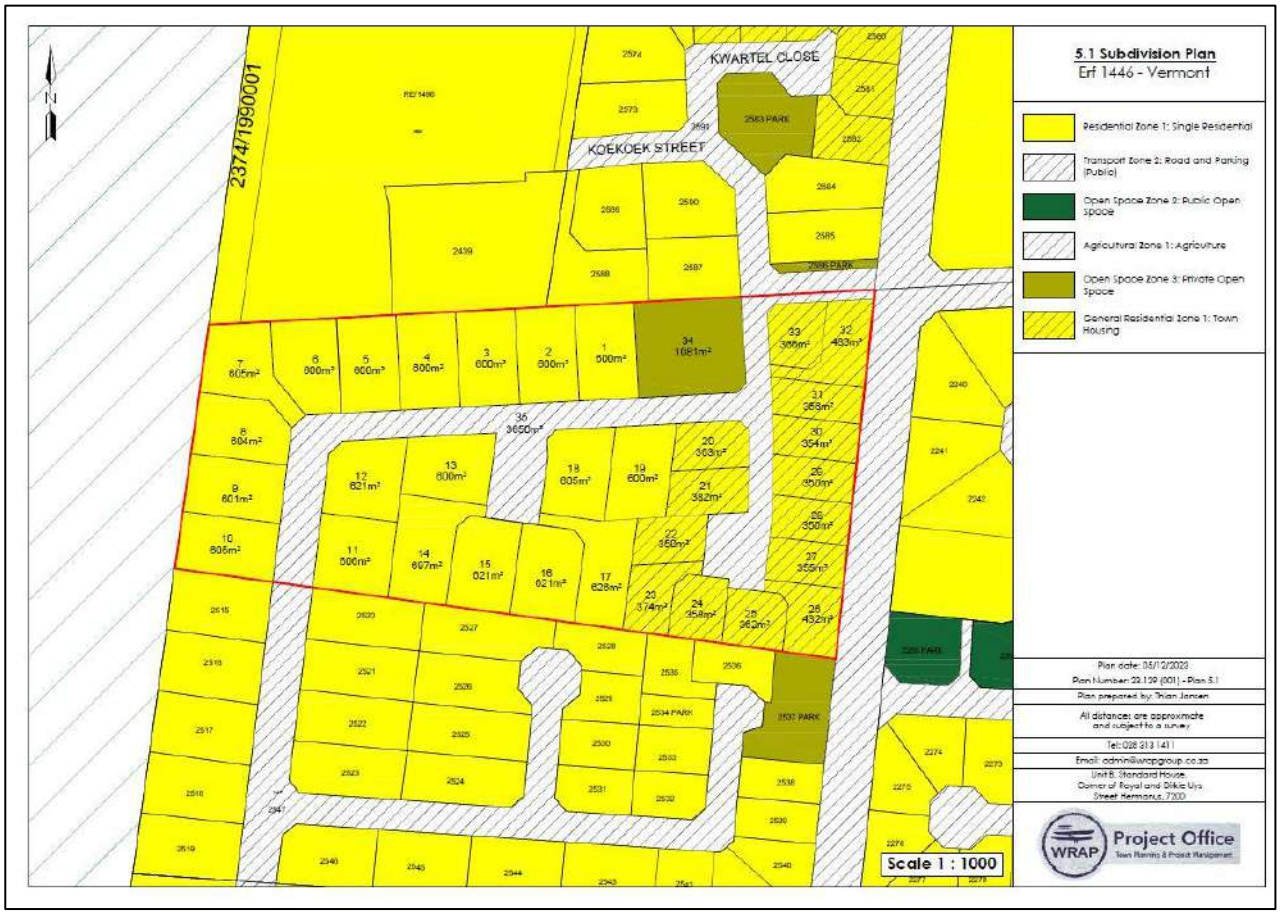


Figure 1: The site development plan for the proposed development.

Table 1: The subdivision of the property into distinct zones with varied developmental sizes

ERVEN	ZONING	TYPE OF DEVELOPMENT	SIZE IN (m^2) for each erven
Erf 1-19	Residential Zone 1	Single Residential	600 m^2- 700 m^2
Erf 20-33	General Residential Zone 1	Town Housing	350 m^2 - 490 m^2
Erf 34	Open Space Zone 2	Private Open Space	1081 m^2
Erf 35	Transport Zone 2	Road and Parking	3650 m^2

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

Access will be taken via existing access network. An internal road network will be developed during the construction phase

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	1	3	0	0	2	3	0	0	0	0	1	4	4	6	0	0	0	0
4.7.	Coordinates of the proposed site(s) for all alternatives:																				

	Latitude (S)	34º	24 ‘	40.82“
	Longitude (E)	19º	8‘	50.91“

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

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

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

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

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

3. Other legislation

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

4. Policies

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

POLICY/BY-LAW	ADMINISTERING AUTHORITY and how it is relevant to this application	TYPE Permit/License/Authorization/ Relevant consideration
Overstrand Municipality Spatial Development Framework	Overstrand Municipality	Comment
Overstrand Municipality Integrated Development Framework	Overstrand Municipality	Comment

5. Guidelines

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal.	
National Environmental Management Act 107 of 1998, As Amended (NEMA) & the EIA Regulations (2014) as amended	The application is undertaken according to the NEMA EIA Regulations, 2014 (as amended).
DEA&DP EIA Guideline and information document series	Applied to various components in the Basic Assessment process. The following guidelines are considered throughout this Basic Assessment process: • Guidelines for EIA Requirements • Guidelines for Public Participation • Guideline on Need and Desirability • Guideline for Involving Biodiversity Specialists in EIA Processes • Guideline for Environmental Management Plans.
National Heritage Resources Act (25 of 1999)	Notice of intent to Develop was submitted to Heritage Western Cape. A Heritage Impact Assessment with input from visual, botanical, and palaeontological impact assessments are included.
GN No. 326- Appendices 1 and 4 relating to the information requirements in the BAR and EMPr.	Provincial Department of Environmental Affairs and Development Planning

6. Protocols

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form
The proposed development complies with the requirements of various protocols, as outlined in the Site Sensitivity Verification Report (SSVR): **Aquatic Biodiversity Theme** – Low Sensitivity – there are no wetlands present on the proposed development areas, and therefore no aquatic invertebrates identified on site. No further assessment required. **Archaeological and Cultural Heritage Theme** – low sensitivity – in line with the requirements of the National Heritage Resources Act, a Notice of Intent to Develop was submitted to Heritage Western Cape as part of the BAR process. Their letter dated 13 February 2024 stipulated that no further assessment required. **Civil Aviation Theme** – High sensitivity – the proposed development is in line with neighbouring development and therefore no additional impacts are expected ito this theme. No further assessment required. **Defence Theme** – Low. No impacts envisaged. No further assessment required. The proposed development is in line with the existing residential development in the area. **Palaeontology** – Medium – no further assessment required as stipulated by Heritage Western Cape. Mitigation measures to be included in the Construction EMPR in the event that materials are uncovered during groundbreaking.

Animal Species Theme – High- This is addressed in the Terrestrial Impact Assessment Report.

Plant Species Theme – High – The botanist was appointed to conduct the Terrestrial Impact Assessment. The plant species theme was covered in the Terrestrial Impact Assessment. One plant SoCC was recorded on site during the survey (*Diosma subulata*; Vulnerable, 5 plants, non-viable population in the long-term absence of fire). Search and Rescue for all translocatable geophytes should be undertaken prior to site development. Suitable candidates include about 500 *Chasmanthe aethiopica (cobraflower*) bulbs, and about ten *Haemanthus coccineus* (poeierkwas). These should be translocated to similar habitat in the adjacent Hoek van de Berg NR, after permission has been obtained to do so. All milkwoods (*Sideroxylon inerme)* above 1m and many of the other indigenous trees on site taller than 1m have been surveyed and shown in Figure 1b. It is understood that some (maybe 35%) of these will be lost to road and bulk service development, but the others should remain and survive within designated erven. The applicant must obtain the relevant permits if any milkwoods (a Protected Species) are to be damaged or lost during the site development process, and subsequently by new erf owners if during the construction phase .

Terrestrial Biodiversity Theme – Very high –All milkwoods (*Sideroxylon inerme*) above 1m and many of the other indigenous trees on site taller than 1m have been surveyed and shown in Figure 1b of the Terrestrial Biodiversity Assessment Report. It is understood that some (maybe 35%) of these will be lost to road and bulk service development, but the others should remain and survive within designated erven. The applicant must obtain the relevant permits if any milkwoods (a Protected Species) are to be damaged or lost during the site development process, and subsequently by new erf owners if during the construction phase.

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 1**	Describe the portion of the proposed development to which the applicable listed activity relates.
27	The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation	Removal of vegetation to establish residential dwellings. SANBI BGIS maps the site as predominantly Overberg Dune Strandveld (EN) with a small section on the north easter boundary mapped as Hangklip Sand Fynbos (CR)
Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 3**	Describe the portion of the proposed development to which the applicable listed activity relates.
12	The clearance of an area of 300 square metres or more of indigenous vegetation i. Western Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004.	Removal of vegetation to establish residential dwellings. SANBI BGIS maps the site as predominantly Overberg Dune Strandveld (EN) with a small section on the north easter boundary mapped as Hangklip Sand Fynbos (CR).

Note:

- The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted.
- Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.

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

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

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

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

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

The preferred alternative involves the development of residential erven, specifically 33 single residential properties, an open space, and a single road. This zoning plan proposed allows for the construction of individual housing units. The development plan aims for the creation of single residential erven, each designated for the construction of a single-family dwelling. This zoning choice suggests a focus on creating a community of individual homes, catering to residents seeking standalone housing units rather than multi-unit or commercial structures.

The specific details of the preferred alternative 2, such as the number of residential erven, their sizes, roads, parking, and open spaces, are outlined in the development plan illustrated in **Figure 2** below. The aim is to provide a residential environment that aligns with the zoning regulations and meets the needs and preferences of potential homeowners in the area.

Figure 2: Development plan for the preferred alternative.

2.	Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21.

The proposed development aligns with the existing land use rights of the property, as indicated in the Notice of Intent (NOI) and application form. The intended use of the land is for single residential, open space and access road within the erven, and this is consistent with the surrounding land use.

3.	Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved.

There are no potential conflicts with the proposed development. However, rezoning and subdivision of the land is required.

4.	Explain how the proposed development will be in line with the following?
4.1	The Provincial Spatial Development Framework.

The proposed development aligns with the Provincial Spatial Development Framework (PSDF) in several ways:

The development is described as residential, specifically within the urban area and residential suburb of Vermont. This corresponds with the PSDF's emphasis on guiding development to appropriate zones and ensuring compatibility with existing land uses.

The development supports the PSDF's goal of directing development towards urbanized zones to optimize infrastructure use and support sustainable urban growth this is the case with this proposed development.

The PSDF provides a spatial vision for the province, emphasizing sustainable and coordinated development. The proposed residential development, being within established urban boundaries, is consistent with the principles of concentrated and well-planned spatial growth outlined in the PSDF.

The PSDF often encourages minimizing the impact on viable agricultural land. In this case, since the property is described as not viable for agriculture and located within a built-up suburb, it suggests alignment with the PSDF's principles of avoiding unnecessary impact on agricultural areas.

4.2	The Integrated Development Plan of the local municipality.

The Overstrand Local Municipality's Integrated Development Plan (IDP) (2022) suggests that residential development in urban areas should prioritize infill development, densification, and the creation of mixed-use nodes. This includes focusing on developing vacant or underutilized land within existing urban areas instead of expanding outwards. This also involves redeveloping brownfield sites or filling in gaps between existing buildings. It also promotes a more compact and efficient urban form, reducing sprawl and the need for new infrastructure.

Densification:

1. Increasing the number of housing units per hectare through various strategies like building taller buildings or creating smaller lot sizes.
2. This can help to accommodate population growth without requiring significant land expansion.
3. Denser development can also create a more vibrant and walkable urban environment.

Mixed-Use Nodes:

- Developing areas that combine residential, commercial, and other land uses within close proximity.
- This promotes a more integrated and sustainable community by reducing reliance on cars and providing access to amenities within walking distance.
- Mixed-use nodes can also create a more vibrant and diverse urban environment.

4.3.	The Spatial Development Framework of the local municipality.

The Overstrand Municipality Spatial Development Framework (OMSDF) for 2023-2024 highlights the challenges in determining housing demand in the region, citing factors such as fluctuating demand, inclusion of households in backyard dwellings, and overcrowded conditions. Limited suitable land and rising infrastructure costs exacerbate these challenges.

The proposed residential development is in alignment with the OMSDF, addressing the pressing need to provide housing options for the growing population, including the Vermont area. Vermont is identified as part of the Greater Hermanus area within the OMSDF, categorized under Hermanus West (Vermont, Onrus, and Sandbaai). The framework does not propose new development areas or urban edge amendments for Hermanus West, emphasizing the importance of development within existing urban areas. No new urban development areas or urban edge amendments are proposed for Hermanus West. This is mainly due to the extensive amount of vacant land within the settlement as well as densification proposals for the area. The site for this proposed development is also included in this proposal (see Figure 3 below).

To accommodate the increasing demand for housing, the development adheres to densification measures, aligning with the OMSDF's objective of providing additional dwelling units within the subject property's

designated boundaries. The decision to initiate this development now is essential to prevent future overwhelming pressures, as delaying it could pose challenges and lead to missed external investment opportunities accompanying population growth.

While the proposed 33 dwelling units may represent a fraction of the overall housing demand for Hermanus, it is a crucial step to proactively address future challenges. Timely action is necessary for sustainable and prosperous growth, ensuring the region's resilience and avoiding the loss of valuable investment opportunities associated with population growth.

The increase in residential opportunities aligns with the vision for sustainable urban development, promoting efficient land use, and fostering denser, compact communities. This approach allows more residents to enjoy the area's benefits while minimizing the need for further urban sprawl, contributing to the overall well-being of the Overstrand region.

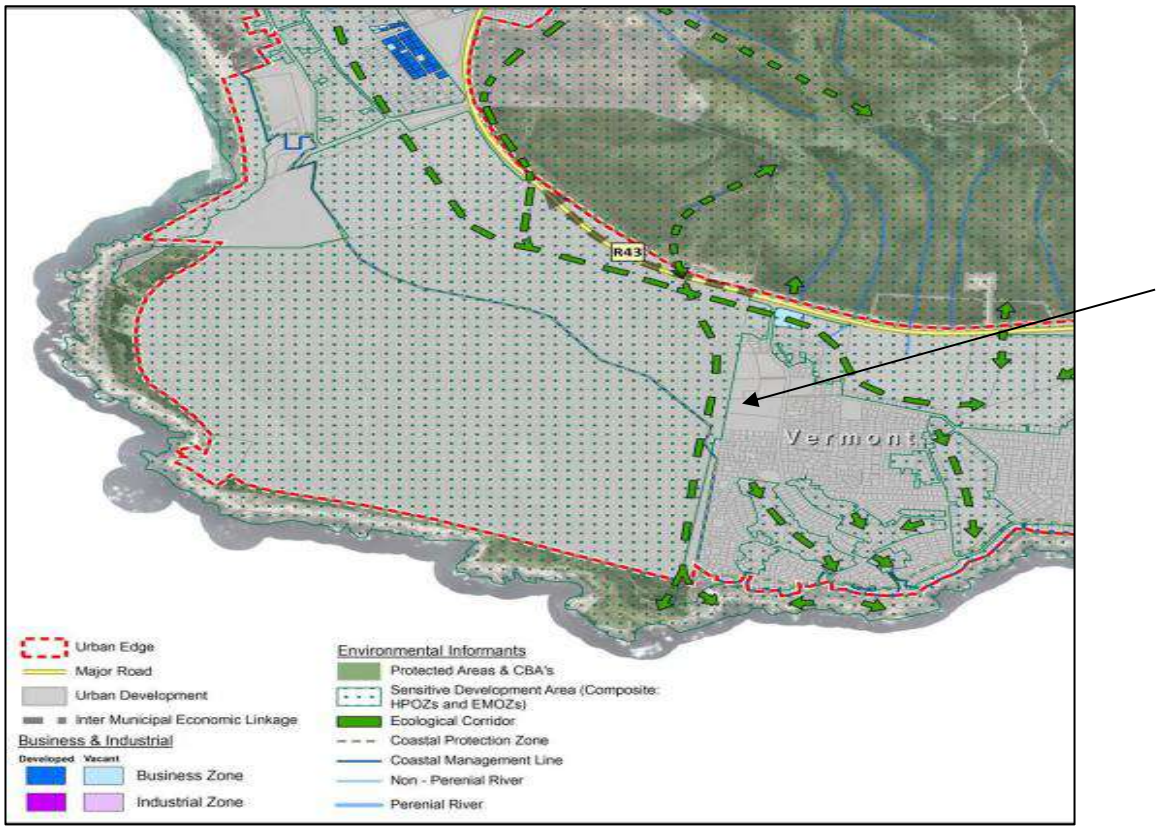


Figure 3: Spatial proposal plan for Hermanus West (Overstrand Municipality IDP 2023/24)

4.4.	The Environmental Management Framework applicable to the area.

The property is not flagged within the Overstrand EMF

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

The comments from Cape Nature and the Department of Environmental Affairs and Development Planning (DEA&DP) influenced the proposed development. Cape Nature identified milkwood trees on the site and recommended that trees taller than one meter be demarcated and avoided. Additionally, comment about possible fauna present on the site was addressed in the Terrestrial Impact Assessment Report. Cape Nature questioned the overall impact findings and necessity for the application of the Biodiversity Offsets.

Due to the scope and location of the project within the existing suburb of Vermont, there are limited layout alternatives available. The preferred layout, Alternative 2, has been evaluated by a botanist and also considers the presence of sensitive vegetation, including milkwood trees. Given the urban context of the development within Vermont, the project does not meet the criteria for the Biodiversity Offset Protocols or any further specialist input

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

In the Western Cape Province, about 80% of land that has important biodiversity on it, does not fall within formally protected areas but is privately or communally owned land. The Biodiversity Stewardship Programme offers conservation options to set up partnerships for managing and protecting natural assets (Western Cape Biodiversity Spatial Plan Handbook, 2017).

- Critical Biodiversity Areas (CBAs) are unique and valuable places on Earth that are home to a wide variety of terrestrial and aquatic plant and animal species, including many rare and endangered species. These areas must be kept in a natural or near-natural state to ensure the long-term survival of the biodiversity that they support.

- ESAs are areas that support the functioning of Protected Areas or CBAs, and are often vital for delivering ecosystem services. They need to be maintained in at least a functional state, but some limited habitat loss may be acceptable.
-
- The Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) are crucial for maintaining biodiversity.

The Western Cape Spatial Biodiversity Plan (WCSBP, 2017) was used in the determination of the conservation areas and sensitivities of the site. The WCBSP Map provides a biodiversity-sensitive perspective for assessing the potential impacts of proposed developments. The WCSBP handbook presents five steps to undertake when making use of the WCSBP Map to determine the biodiversity context of a site to inform the initial project plans.

1. Prepare for the site visit

The desktop study found the site to partially fall within a mapped Ecological Support Area (ESA) 1, specifically Terrestrial, category. According to the SA Vegetation Map the original natural vegetation in the study area is mostly Overberg Dune Strandveld, with a transition to Hangklip Sand Fynbos in the northeast corner. The Overberg Dune Strandveld has an ecosystem threat status listed as “Endangered” and the latter contains a critically endangered ecosystem.

2. Conduct the site visit

The site was visited on 20 January 2024, and again on 8 April (for a tree survey). The initial and primary site visit was well outside the optimal winter – spring flowering season in this mainly winter rainfall area, and thus the few potential geophytes and annuals likely to be present were neither evident nor identifiable, whilst all perennial plants were identifiable.

3. Assess impacts on Biodiversity

The proposed development is located in Vermont. It can safely be assumed that the primary construction phase ecological impact of the proposed subdivision and development would be permanent loss of all or most of the existing natural and partly natural vegetation and faunal habitat in the development footprints (most of it gazetted as an Endangered vegetation type). A single plant Species of Conservation Concern (SoCC) was recorded during the survey, and no others are likely to persist here. About five plants of the buchu *Diosma*

subulata (Vulnerable) were found deep within a rooikrans thicket in the centre of the site. These reseeding plants require fire for regeneration, and in the absence of fire on site for at least 20 years are unlikely to survive much longer, even if the site is not developed. The presence of these five plants is significant, as the species is now rare in the Hermanus area, but as noted, they are unlikely to survive on this site, even were it not to be developed, and they will not survive translocation or replanting either. There is no threatened fauna likely to use the site, with the exception of the Cape Dwarf Chameleon (*Bradypodion pumilum*), which is listed as Vulnerable, and may occur on site.

The CapeNature Spatial Biodiversity Plan in the botanical specialist report also shows that Other Natural Area (ONA) vegetation is mapped for most of the study area, with a small patch of ESA 1 (Ecological Support Area 1) in the east. ONA is also mapped to the south and east of the site, as well as southeast of the site, along with ESA1 southeast of the site, and all these areas have thus clearly been developed since the Spatial Biodiversity Plan was developed, which indicates how fast this area has been developing.

4. Identify opportunities to conserve biodiversity

- One plant Species of Conservation Concern was recorded within the site (*Diosma subulata*, Vulnerable; non-viable population in absence of fire) and no others are likely. No threatened fauna is likely to use the site, with the exception of the Cape Dwarf Chameleon (*Bradypodion pumilum*), which is listed as Vulnerable, and may occur on site.

- All milkwoods (*Sideroxylon inerme*) above 1m and many of the other indigenous trees on site taller than 1m have been surveyed and shown in Figure 1b of the terrestrial biodiversity assessment. It is understood that some (maybe 35%) of these will be lost to road and bulk service development, but the others should remain and survive within designated erven, although another 50% may be lost during house development. The applicant must obtain the relevant permits if any milkwood's (a Protected Species) are to be damaged or lost during the site development process, and subsequently by new erf owners if during the construction phase.

- Search and Rescue must be undertaken for all reptiles and any other fauna, notably tortoises and chameleons, during the site preparation, and especially when any earthworks and trenches are being dug or left open. This should be undertaken by an appointed ECO on a daily basis, until the site has been cleared (apart from the milkwood's and other designated trees) and the services are installed. Rescued animals should be released inside the adjacent Hoek van der Berg Nature Reserve (with relevant permission).

- Search and Rescue for all translocatable geophytes should be undertaken prior to site development. Suitable candidates include about 500 *Chasmanthe aethiopica* (*cobraflower*) bulbs, and about ten *Haemanthus coccineus* (*poeierkwas*). These should be translocated to similar habitat in the adjacent Hoek van de Berg NR, after permission has been obtained to do so, and should be undertaken by someone with experience in plant translocations.

- Given that relatively little mitigation is possible and that quite substantial biodiversity will still be lost (even if not of High or Medium negative significance) it is recommended that the applicant make a sizeable conservation contribution (donation) to a local conservation group (Vermont – Hermanus area) that is involved with alien invasive vegetation management and control, as this is a major threat to the remaining habitat in the region.

All mitigation measures and recommendations as presented by the respective specialists as well as those given by the EAP to optimise on opportunities to conserve and protect biodiversity, have been incorporated into the EMPr.

5. Include biodiversity considerations in the environmental report

- The study area supports partly degraded vegetation that is best classified as Overberg Dune Strandveld, which is gazetted as an Endangered vegetation type. The site has been degraded by a long history of woody alien invasives, which do not appear to have been managed in any significant way.
- The development of the site is likely to have an acceptable Low to Medium negative faunal and botanical impact at a regional scale (before and after mitigation).
- All the relatively minor mitigation outlined in Section 8 must be properly implemented.
- Given that relatively little mitigation is possible and that quite substantial biodiversity will still be lost (even if not of High or Medium negative significance) it is recommended that the applicant make a sizeable conservation contribution (donation) to a local conservation group (Vermont – Hermanus area) that is involved with alien invasive vegetation management and control, as this is a major threat to the remaining habitat in the region.

Figure 4: The proposed site for development with marked Terrestrial ESA.

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

N/A

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

The screening report has not changed. However, the site sensitivity verification report has been amended on the final BAR in response to the comments received from PPP1.

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

The primary focus of the development is to create a single residential erven, town housing, an open space, and a street. This means that the available vacant land will be utilized to accommodate individual households, contributing to the optimization of space within the urban area.

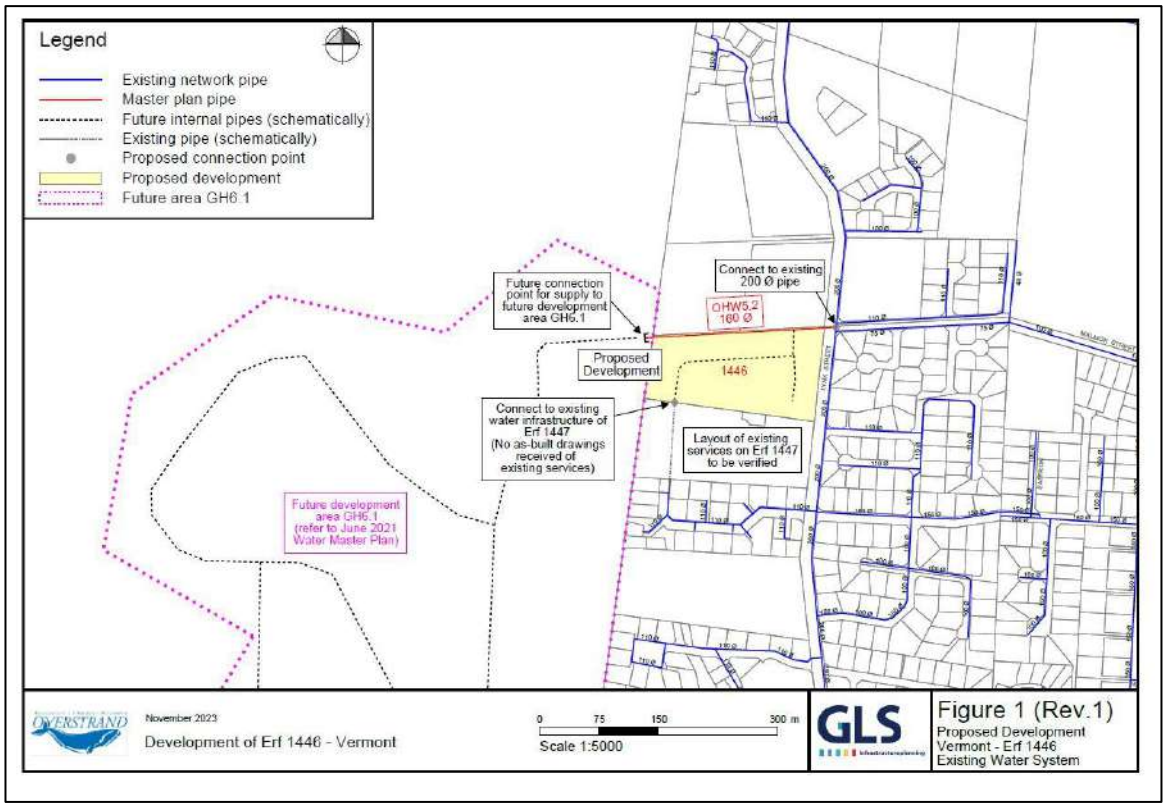
10.	Explain how the proposed development will optimise the use of existing resources and infrastructure.

The proposed development is located within the municipal urban area, close to the existing road networks and existing municipal services infrastructure, thereby making use of the existing municipality, the project

taps into established infrastructure, such as water supply, sewage systems, and road networks that are already in place and can be seamlessly extended to the new residential erven. This approach minimizes the need for extensive new infrastructure development.

11.	Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16).

The Overstrand Municipality consulting engineer (GLS) has generated the service availability and infrastructure report and has confirmed that there is sufficient capacity to accommodate the proposed development. However, minor upgrade of a small section of the 110 mm diameter outfall sewer in Malmok Crescent is required. The GS Consulting report is attached as **Appendix G2.**



12.	In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix J.

Refer to **Appendix J** for the detailed Need and desirability motivation.

Integrated Environmental Guideline on Need and Desirability in terms of the EIA Regulations, 2010 "Consistent with the aim and purpose of EIA, the concept of "need and desirability" relates to, amongst others, the nature, scale, and location of development being proposed, as well as the wise use of land. While essentially, the concept of "need and desirability" can be explained in terms of the general meaning of its two components in which need primarily refers to time and desirability to place (i.e. is this the right time and is it the right place for locating the type of land-use/activity being proposed?), "need and desirability" are interrelated and the two components collectively can be considered in an integrated and holistic manner". The proposed development is also aligned with the Department of Environmental Affairs' Integrated Environmental Management Guideline on Need and Desirability. The guideline states that developments should be considered desirable if they:

- Promote sustainable development.
- Contribute to the quality of life of the community.
- Are consistent with the principles of equity and social justice.
- Are consistent with the principles of environmental protection.

In assessing the need and desirability of the proposed development this proposal refers to the Department's Guideline on Need and Desirability (March 2013).

Need:

- The proposed development is driven by the significant demand for housing in the Hermanus, Vermont area. The creation of 33 single residential erven directly addresses the need for additional housing units, contributing to alleviating the housing shortage.
- With a growing population in the urban area of Vermont, there is an inherent need for expansion and the provision of housing options to accommodate the increasing number of residents.
- The development is specifically designed to cater to the needs of single families. Recognizing the diversity in household structures, the creation of single units meets the demand for family-oriented housing in the community.
- The construction and subsequent habitation of the residential erven contribute to economic stimulus. Job creation during the construction phase and potential growth in local businesses due to increased population density contribute to the economic well-being of the community.
- In addition to housing and employment, the development will work towards revitalizing the urban area, making it more attractive to both current residents and visitors. This enhancement of the living environment aligns with the need to improve the quality of life in urban areas, contributing to the overall welfare of the community.

Desirability:

- The proposed development enhances the desirability of the community by providing much-needed housing options. This contributes to the overall improvement of the quality of life for residents in Vermont.
- The development's location in an existing urban area promotes the principle of urban infill, optimizing the utilization of available land within established communities. This approach aligns with sustainable urban planning principles.
- Placing residential units within the existing urban fabric improves accessibility to amenities, public services, and transportation, enhancing the overall desirability of the location.
- Creating single-family units fosters social connectivity, contributing to the formation of a cohesive and vibrant community. Residents are likely to benefit from shared spaces and community interactions.
- The development considers creation of the open spaces in favour for environmental protection.
- By creating residential units on this site also will contribute to quality of life for the community, since illegal littering is taking place on this site.

SECTION F: PUBLIC PARTICIPATION

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

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

N/A

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

Public participation was undertaken in line with the NEMA EIA Regulations as outlined in the NOI and application form. Proof of PPP document is attached as **Appendix F**

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

Overstrand Municipality
Cape Nature
DEA&DP Landuse

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

N/A

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

N/A

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

DEA&DP comments

- Confirmation is required from the local authority regarding the availability of water, electricity, sewage treatment, and solid waste management for the proposed development – *Complete see GLS Service report attached*
- A Terrestrial Biodiversity Assessment identified milkwood trees on the site, recommending that trees taller than 1m be marked and avoided. Clarification on how this is incorporated into the development design is needed – *the trees have been GPSED by the botanist and included on the site plan*
- Comments from CapeNature must be included in the Basic Assessment Report (BAR) - *complete*
- A clear justification is needed for not preferring Layout Alternative 2 – *complete – refer to comments and response report*
- The Public Participation Process must comply with the approved plan and NEMA EIA Regulations, with proof of compliance included in the BAR – *completed as per regulations, see Proof of PPP*

Cape Nature

- The property is categorized as "Other Natural" on the Western Cape Biodiversity Spatial Plan, with the north-eastern corner classified as Ecological Support Area (ESA) 1. The vegetation includes endangered Overberg Dune Strandveld and critically endangered Hangklip Sand Fynbos. No freshwater features are present on the site.

- The screening tool results indicate very high sensitivity for terrestrial biodiversity, high sensitivity for animal and plant species, and low sensitivity for aquatic biodiversity. - *The Terrestrial / Botanical*

Impact Assessment addresses both the terrestrial biodiversity and animal and plant species themes. No further specialist assessment is required. Search and Rescue has been included as a recommendations for both fauna and flora as required.

- The terrestrial biodiversity assessment describes two vegetation types from the National Vegetation Map (NVM), noting the presence of strandveld and disturbance-tolerant species, and significant alien invasive species infestation. Indigenous species include one non-locally indigenous species, Harpephyllum caffrum. No species of conservation concern (SCCs) were recorded.

- The fauna discussion in the assessment references the screening tool but does not specifically mention high sensitivity bird species, suggesting SCC birds are unlikely to be present. The Cape dwarf chameleon, a vulnerable species, is likely present. Noted, with mechanism for chameleon search and rescue included in conditions of EA

- The site sensitivity verification report needs to include the animal species theme addressed in the terrestrial biodiversity assessment. CapeNature finds sufficient information on aquatic biodiversity and animal species themes.

- The impact of habitat loss is rated as medium significance, with limited mitigation measures, resulting in a residual medium significance impact requiring a biodiversity offset per National Biodiversity Offset Guidelines. The impact rating and need for biodiversity offset was reviewed by the botanist and the overall impact reduced and need for BO removed.

- CapeNature questions the medium impact rating given the site's poor condition and heavy alien species invasion. They suggest considering alternative layouts and further mitigation before deciding on a biodiversity offset. The presence of the Cape dwarf chameleon should include consideration of local NGO efforts for search and rescue. – As above

- In conclusion, CapeNature does not object to the application but recommends further investigation of mitigation strategies to reduce residual impact. If a biodiversity offset is necessary, a separate study should follow National Biodiversity Offset Guidelines, and the site sensitivity verification report should be updated as recommended to ensure compliance with protocols.

Erf 2528 - private

The I&APs from Erf 2528 has no objection to the proposed development based on the provided data. However, they emphasize that double-storey houses should not be allowed on the stands adjacent to Erf 1447 (Vermont Views complex).

All the comments above have been taken into consideration and this has further informed the preferred layout alternative 2. Given the proposed development and location within the existing suburb of Vermont there are not many layout alternative available for the proposed development. Alternative 2 is the preferred alternative and has been assessed by the botanist and takes into consideration the location of sensitive vegetation such as milkwood trees.

Note:

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

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

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

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

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

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

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

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. Groundwater

1.1.	Was a specialist study conducted?	~~YES~~	NO ✓
1.2.	Provide the name and or company who conducted the specialist study.		
N/A			
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
N/A			
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.		
N/A			

2. Surface water

2.1.	Was a specialist study conducted?	~~YES~~	NO ✓
2.2.	Provide the name and/or company who conducted the specialist study.		
N/A			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		
No presence of Freshwater courses or surface water within the site.			

3. Coastal Environment

3.1.	Was a specialist study conducted?	~~YES~~	NO ✓
3.2.	Provide the name and/or company who conducted the specialist study.		
Not Applicable			
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
N/A			
3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.		
N/A			
3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.		
N/A			

4. Biodiversity

4.1.	Were specialist studies conducted?	YES ✓	~~NO~~
4.2.	Provide the name and/or company who conducted the specialist studies.		
Nicholas Alexander Helme, Nick Helme Botanical Surveys			
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		

According to the SA Vegetation Map the original natural vegetation in the study area is mostly Overberg Dune Strandveld, with a transition to Hangklip Sand Fynbos in the northeast corner (Mucina & Rutherford 2018; see Figure 5 below). Overberg Dune Strandveld is now gazetted as Endangered on a national basis and supports a relatively low number of threatened and endemic plant species, and occurs on deep, nutrient poor, marine derived, alkaline or neutral soils in the area between here and Agulhas, and the vegetation type does not need fire for optimal ecological functioning (Government of South Africa 2022). On the other hand, the Hangklip Sand Fynbos is now gazetted as Critically Endangered on a national basis and support a fairly high number of threatened and endemic plant species, and occurs on deep, nutrient poor, sandstone derived, acid soils in the area between Hangklip and Hermanus, and the vegetation type needs fire for optimal ecological functioning (Government of South Africa 2022). Based on Botanical specialist ground-truthing the entire site is currently best mapped as Overberg Dune Strandveld.

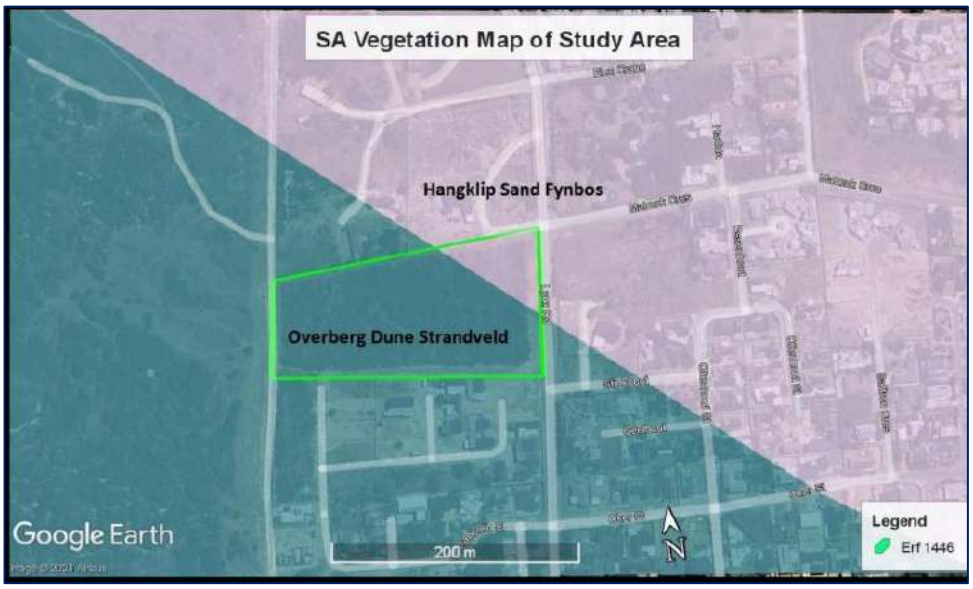


Figure 5: Extract of the SA Vegetation Map for the Study Area

The systematic conservation planning, supported by Cape Nature BSP, vegetation maps, NFEPA, NSBA, and other biodiversity informants analysed via a desktop study, played a collaborative role in positively shaping the proposed development. Following the guidelines outlined in the Western Cape Biodiversity Spatial Planning, the chosen development site is strategically positioned outside the limits of the Critical Biodiversity Area (CBA). While it incorporates a small portion of the Ecological Support Area (ESA), it falls outside the Priority Area, recognized for its significance and management considerations due to sensitivity and endangered status.

ESAs play an important role in supporting the functioning of Protected Areas or Critical Biodiversity Areas (CBAs) and are often vital for delivering ecosystem services. Some habitat loss is acceptable, provided the underlying biodiversity objectives and ecological functioning are not compromised. The deliberate selection of a site beyond the Critical Biodiversity Area, the inclusion of Ecological Support Areas, and adherence to relevant legislation collectively demonstrate the commitment to minimizing its impact on sensitive ecological features and promoting sustainable land use practices.

The development of the site is likely to have an acceptable Medium negative faunal and botanical impact at a regional scale (before and after mitigation). The site has been degraded by a long history of woody alien invasives, which do not appear to have been managed in any significant way.

Due to the degraded state of the application site, the proposed development will have minimal impacts on the terrestrial ESA on the north-west corner of the site.

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

The objectives and management guidelines of the WCBSP are intended to guide planning and decision-making in terrestrial and freshwater CBAs and ESAs on land outside of protected areas.

Ecological Support Areas – North east corner of the site
Feature: Climate Corridor, Critically Endangered or Endangered veg
Category 1: ESA: Terrestrial
Definition: Areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of PAs or CBAs and are often vital for delivering ecosystem services.
Objective: Maintain in a functional, near-natural state. Some habitat loss is acceptable, provided the underlying biodiversity objectives and ecological functioning are not compromised.

These guidelines direct the EAP or Specialists to promote the effective management of biodiversity. Although the site is mapped to fall within the endangered Overberg Dune Strandveld vegetation, there are developments of housing within these areas and the site is degraded by the dense presence of the invasive alien plants on the site.

The CapeNature Spatial Biodiversity Plan (see Figure 5) shows that Other Natural Area (ONA) vegetation is mapped for most of the study area, with a small patch of ESA 1 (Ecological Support Area 1) in the east. ONA is also mapped to the south and east of the site, as well as southeast of the site, along with ESA1 southeast of the site, and all these areas have thus clearly been developed since the Spatial Biodiversity Plan was developed, which indicates how fast this area has been developing. The area bordering the site to the west is the Hoek van der Berg Private Nature Reserve.

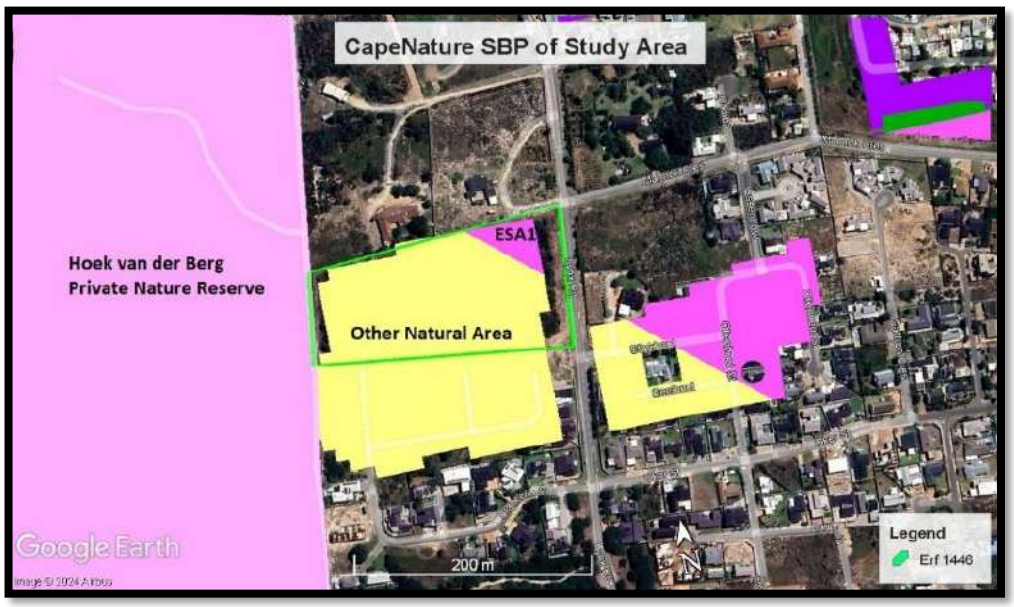


Figure 5: Extract of the CapeNature Spatial Biodiversity Plan (Pence 2017) (2018) for the area, showing that the central wetland part of the site is mapped as an ESA2 (Ecological Support Area), linking the Hoek van de Berg protected area to the west with the Vermont Salt Pan to the east, and is part of the primary water source for that pan (extracted from the Botanical Specialist report).

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

The proposed development, which requires vegetation clearance, will have a significant impact on the Terrestrial Ecosystem Support Area (ESA) and Other Natural Areas (ONA) by permanently removing natural habitat and reducing indigenous plant diversity. It is important to note that the site is not within a conservation area or priority area where there would be major concerns about the overall vegetation. However, the ESA within the site contains critically endangered species, and while only a small portion of the site is affected, it is still an important area for conservation. However, some habitat loss is acceptable, provided the underlying biodiversity objectives and ecological functioning are not compromised.
The ONA consists of endangered species, but most of these areas have already been developed.

The impact on the ESA has influenced the development plan by necessitating mitigation measures to address the loss of biodiversity and the ecological function of the area. Even so, most of the areas adjacent to the site have been developed and still developing.

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

Not applicable. The development is not within a protected area.

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

Extract from the Terrestrial Biodiversity Impact Assessment:

No frogs are likely on site, due to the absence of wetlands, although *Breviceps montanus* could in theory be present, as it does not require water or wetlands.

Bradypodion pumilum (Cape Dwarf Chameleon) has been regularly recorded from similar nearby habitat (iNaturalist.org) and is likely to be present on site. This species is Redlisted as Vulnerable (Bates et al 2014). No other Redlisted reptiles are likely to be present. The Southern Adder *(Bitis armata;* Vulnerable) has been flagged by the Screening Tool for the region, but is unlikely in this habitat. An Angulate Tortoise (*Chersina angulata)* was observed on site.

No bird SoCC are likely on site, and a typical selection of Dune Strandveld species was recorded, including Speckled Mousebird, Karoo Prinia, Southern Doublecollared Sunbird, Cape Bulbul, Cape Whiteye, Fiscal Flycatcher, Cape Spurfowl, Cape Robinchat and Boubou.

Mammals present or using the site (tracks and scat found, or live animals seen) include porcupine (*Hystrix africaeaustralis),* Striped Fieldmouse (*Rhabdomys pumilio*) and Cape Grey Mongoose (*Herpestes pulverulentus),* and other likely species include Large Grey Mongoose (*Herpestes ichneumon*), Caracal (*Caracal caracal*), and Cape Genet (*Genetta tigrina*). Some of these may occasionally be resident, but most probably reside mainly in the much larger adjacent Hoek van de Berg Nature Reserve.

No threatened butterflies are likely to utilise the site, although this cannot be ruled out without a survey (Mecenero et al 2013). Indigenous dune snails (*Trigonephrus*) were also observed on site (possibly *T. ambiguosus)*.

The entire site is deemed to be of Medium faunal sensitivity, and no map is provided as it adds little value.

Given the transformed nature of the site and built-up nature of its immediate surrounds, no further faunal assessment is required. The Search and Rescue for slow moving species is added as a condition of approval.

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.
The proposed development encompasses a total footprint of 21,578 square meters, comprising various zones for single residential erven, town housing erven, public open space erven, as well as the road and parking area. It is important to note that a small portion of the Ecological Support Area (ESA) falls within the development site, however, mitigation measures are included in the EMPr to minimize the possible negative impacts. The geographical aspects influenced by the proposed development include a significant change in the landscape. This will be in the form of a transition from thick vegetation to urban infrastructure. The development also raises concerns about vegetation loss, particularly impacting the significant ESA terrestrial ecosystem present at the site, but the loss is considered to be moderate. This loss is a noteworthy aspect as it pertains to biodiversity and ecological considerations. Additionally, the development may contribute to land degradation, especially in areas where vegetation is removed. The initial impact of construction activities may lead to soil erosion in certain sections, highlighting the importance of implementing effective erosion control measures after construction.

6. Heritage Resources

6.1.	Was a specialist study conducted?	YES ✓	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
The Notice of Intent to Develop (NID) was submitted to Heritage Western Cape on the 29 January 2024. Their letter dated 13 February 2024, HWC24012315, confirmed that no further Heritage specialist assessment was required.			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
The areas that contain sensitive heritage resources have influenced the proposed development by prompting a comprehensive study to assess and identify any potential heritage resources. From a practical perspective provided by the Environmental Assessment Practitioner (EAP), the initial assessment indicates that the site does not currently contain any heritage resources. However, to ensure a thorough evaluation and adherence to heritage conservation principles, a dedicated study for heritage resources is pending. This additional study aims to confirm the absence or presence of heritage resources and, if present, to outline measures for their preservation or mitigation during the development process.			

7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.
In terms of Section 38 of the NHRA, specific considerations related to the form of construction and development activities are outlined below and necessitated the requirement for the submission of a Notice of Intent to develop (NID) to Heritage Western Cape. The proposed development, being within the existing urban zoning, however, it triggers some of the specified criteria, such as the construction of extensive barriers, developments exceeding certain extents, or rezoning activities that would necessitate additional scrutiny under the NHRA. 38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as- (8) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length; (b) the construction of a bridge or similar structure exceeding 50m in length; € any development or other activity which will change the character of a site- (i) exceeding 5 000 m2 in extent; or (ii) involving three or more existing erven or subdivisions thereof; or (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or (iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority; (d) the re-zoning of a site exceeding 10 000 m2 in extent; or (e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development. The development is designed to create residential erven in an already urbanized area, and it is not expected to cause no major harm to the surrounding environment, as the adjacent areas are already developed. The assumptions that the absence of culturally or historically significant elements within the project site eliminates constraints related to heritage conservation, facilitating the development process. The Notice of development is submitted to Heritage Western Cape. Their letter dated 13 February 2024 confirmed that no further Heritage assessment is required for the proposed development.

8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.

The project site falls within the jurisdiction of the Overstrand Municipality and the Overberg District Municipality (ODM). The visual metrics of the ODM's socioeconomic profile (2023) are presented below.

Overstrand Municipality is located along the south-western coastline of the Overberg District Municipal area bordering the City of Cape Town in the west and Cape Agulhas Municipality in the east. Its northern neighbour is Theewaterskloof Municipality. Overstrand is a dynamic unity combining great potential and a beautiful setting. Our task is to bring about growth and development to the benefit of all our people, in their different communities, whilst maintaining a balance with nature. The Municipality covers a land area of approximately 1708 km2, with a projected population of 110 971 people (Western Cape Provincial Treasury, SEP 2022) and covers the areas of Hangklip Kleinmond, Greater Hermanus, Stanford and Greater Gansbaai.

In addition to the endless, pristine beaches dotting the coastline, the Overstrand boasts 5 Blue Flag beaches. Tourism is a major economic driver in the area and its popularity as a holiday destination results in a fourfold increase of its population over the holiday seasons. This influx places a great strain on the existing municipal services and roads infrastructure.

The Overstrand municipality's population increased by 56 721 people over a period of 20 years from 1996 to 2016. Overstrand's population has increased steadily from 80 432 in 2011 to 93 407 in 2016. Between 2011 and 2016 the population growth in Overstrand was 16.1 per cent. The projected population growth for the period 2022-2026 are cited on the Municipal IDP 2023/24. The population increase for the municipality is expected to increase from 110 971 to 124 826 in 2026, making it the most populated municipal area in the Overberg District.

According to the Overstrand IDP 2023/2024, the Overstrand has a growing population that will increase the demand for housing, employment, service delivery and related infrastructure developments. The increased population growth will therefor place increased pressure on the municipal resources to develop new as well as maintain existing infrastructure. The ability to work from home has enabled households to move away from the economic hubs and settle in smaller towns such as Hermanus. This trend can be a valuable injection for the local economy as well as the municipality in terms of income generation, despite the increased demand for services (Source: Western Cape Provincial Treasury, MERO 2021and SEP 2021).

Overstrand's 2023 projected forecast is 0.1 per cent economic growth, which is lower than both the District and Western Cape projection over the same period. In 2020, a total of 33 096 workers were employed in the Overstrand municipal area, contributing 27.4 per cent to Overberg District employment during the year. Between 2016 and 2020, the Overstrand municipal area experienced an average annual decline of 520 jobs. Estimates for 2021 indicate a further deterioration in Overstrand's employment, with a total of 1 475 jobs lost. Overall, the deterioration of the Overberg's labour market conditions in 2020 was due to the COVID-19 pandemic and the implantation of lockdown restrictions to contain its spread. Furthermore, restrictions in domestic and international travel greatly impacted activity in sectors related to tourism (Western Cape Provincial Treasury, MERO, 2022). Furthermore, load shedding in 2022 and 2023 are expected to further deteriorate employment prospects in the Overstrand municipal area. The estimated decline in employment opportunities is likely to result in a decline in household income, which in turn will continue to restrain municipal revenue and increase the demand for free basic services.

Overall, all development and growth in Overstrand must be sensitive to the area's most important asset, that being the natural environment. Sustainable development in Overstrand will be guided by the municipal spatial development framework (SDF) and related sector plans. The SDF identified Kleinmond, Hawston, Hermanus, Stanford and Gansbaai with its suburbs as areas prioritized for further development. This is due to bulk services being available to support densification and developments.

The proposed site is situated in the Overberg Municipal area, specifically in Vermont, which falls under the urban jurisdiction of Hermanus. The existing social and economic characteristics of the community in the vicinity of the proposed site are influenced by several factors:

- Job creation is identified as a critical need in the area. The proposed development is expected to contribute significantly to economic growth by generating employment opportunities. This, in turn, can lead to increased investments in the area, fostering economic prosperity.
- The community in the vicinity appears to have a real estate market conducive to property transactions. The development's focus on creating residential erven aligns with the demand for property in the area. The sale of these properties to new residents is anticipated to contribute to the economic dynamics of the community.
- The proposed development is seen as an opportunity for attracting investments. The creation of residential properties may attract investors interested in the real estate market, further stimulating economic activities in the area.

8.2.	Explain the socio-economic value/contribution of the proposed development.

The proposed development holds several socio-economic values and contributions to the community and the broader area:

- One of the significant contributions is the creation of employment opportunities, both directly and indirectly. The proposed development will have both short- and long-term economic impacts on the Overstrand Municipality and the surrounding area. It will create employment opportunities during the construction phase, generate additional rates and taxes, and attract new residents to the region, all of which will contribute positively to the local economy. The development has the potential to generate revenue for the local municipality through property taxes and other associated fees. This additional revenue can be reinvested in community services and infrastructure.
- By attracting investments and stimulating economic activities, the development contributes to the overall economic growth of the area. Increased economic activities will lead to the growth of local businesses and services, benefiting the community.
- The creation of residential erven adds value to the real estate market in the area. The sale of properties to new residents contributes to the local property market, potentially increasing property values and attracting further investments.
- Additionally, the combined development is expected to attract at least 99 new residents to the Hermanus area, based on a calculation ratio of 3 people per dwelling unit. These new residents will contribute to the local economy by spending money on various items such as food, petrol, restaurants, repairs, and other goods and services, thereby boosting the local economy. The development may lead to improvements in local infrastructure. Increased housing demand could necessitate enhancements to utilities, roads, and other essential services, benefiting both existing and new residents.

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

The development will make a huge contribution towards job creation during the construction phase and potential skills development for local labourers further align with social initiatives aimed at uplifting the community.

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

It is not likely that the proposed development will have any implications for people's health and well-being, and these considerations are likely to influence the planning and execution of the project. Construction activities and increased human presence can contribute to elevated noise levels. This has a relatively small potential to impact the well-being of nearby residents. Measures to minimize construction-related noise and consideration are given to the EMPr to mitigate noise disturbances.

- Construction chemicals and materials may produce odours that could affect the quality of life for residents in the neighbourhood.
- Changes to the visual character of the area, especially if it involves significant alterations to the landscape from natural vegetation to built infrastructure, can influence the sense of place for existing residents, especially those who love nature.
- Changes in the community structure, influx of new residents, or alterations to the neighbourhood's character can impact social cohesion. The development aims to foster a sense of community, potentially through the inclusion of open spaces in the development plan.

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. Details of the alternatives identified and considered

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

Provide a description of the preferred property and site alternative.

The preferred property and site alternative is situated on Erf 1446, owned by the applicant. This property encompasses the development of 33 residential erven, comprising single residential housing, town housing, road infrastructure, parking facilities, and an allocated open space. The site spans an extent of approximately 2.1 hectares. Various layout alternatives have been considered, all within the same site, with a proposed road connecting the development site to Lynx road, ensuring accessibility and connectivity as a well as the consideration of the milkwood trees. This comprehensive plan is designed to accommodate diverse housing options while maintaining the balance between ecosystems.

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

No alternative sites were investigated, as the property under consideration is owned by the applicant. However, alternative infrastructure and design layouts were explored. Various design options were considered, with a particular focus on the layout alternatives. One notable aspect was the exploration of different design layouts that involved the incorporation of a road connecting the development site to Lynx road . Additionally, attention was given to addressing the Ecological Support Area (ESA) on the site during the planning and design process.

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

The selection of the preferred property and site alternative is motivated by the unique circumstances surrounding the development. It is crucial to emphasize that the developer does not have any alternative site available for consideration. As a result, the identified property stands as the sole viable option for the proposed development.

The absence of alternative sites restricts the options available to the developer. This property is the only viable choice for meeting the development objectives. Given the singular nature of the available property, a comprehensive site selection matrix may not be applicable in this scenario. The developer is compelled to focus on the specific attributes of the chosen property. The motivation for selecting this property lies in the imperative to proceed with the development, considering the housing needs and the absence of alternative sites.

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

Refer to the above.

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

There are no property alternatives.

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

Positive Impacts:

- The proposed development contributes to addressing housing needs, providing residences for single families.
- Job creation and economic growth are anticipated during the construction phase, fostering local economic development.
- The inclusion of open space within the Ecological Support Area (ESA) on the property demonstrates an effort to maintain ecological features.
- The chosen property is outside the Critical Biodiversity Area (CBA), aligning with conservation planning guidelines.

Negative Impacts:

- The primary negative impact is the removal of natural vegetation (about 1400m^2), including a portion of the ESA, leading to habitat disruption. The clearance of vegetation may result in habitat loss and potential impacts on biodiversity, particularly in the ESA – however, the site is highly transformed and requires significant rehabilitation to return to its natural state It is also one of the last remaining erven available for single residential development in Vermont.
- The development may alter the visual character of the area, transitioning from natural vegetation to urban infrastructure.
- Construction activities may contribute to soil erosion, especially in areas where vegetation is removed, necessitating erosion control measures.
- During the construction phase, noise and dust generation may occur, impacting the immediate environment.

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

Provide a description of the preferred activity alternative.

N/A

Provide a description of any other activity alternatives investigated.

N/A

Provide a motivation for the preferred activity alternative.

N/A

Provide a detailed motivation if no activity alternatives exist.

N/A

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

N/A

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

Provide a description of the preferred design or layout alternative.

It should be noted that there is limited scope to develop significantly different layouts for the development of erf 1446. The layout design is directed or constrained by predetermined access roads, need and desirability and existing development in Vermont.

The difference between layout alternatives 1 and 2 only relate to the size of the erven and placement of open spaces. The presence of the vegetation has been mapped relative to the layout of alternative 2 to avoid the removal of milkwood as far as possible as well as the enlargement of the open space, as requested by the municipality. For this reason, alternative 2 is the preferred layout.

Retaining the status quo as reflected in the no-go alternative, is not preferred because the erf is one of the last remaining vacant erven in Vermont.

ALTERNATIVE LAYOUT 2 (PREFERRED)

The preferred design or layout alternative for the proposed development is based on the establishment of single residential erven, general residential, private open space, road and parking within the pre-existing urban area in Vermont. The primary objective is the creation of a cohesive community featuring individual-family residences and general residential. The layout incorporates designated areas for roads, parking, and larger area (1081 m^2) designated for private open space. Recognizing the potential adverse impacts on terrestrial ecological support areas (ESAs), the design emphasizes the allocation of the larger open space within the ESA boundaries. The milkwood trees have been surveyed and overlayed on to the new preferred alternative 2 and taken into consideration relative to the botanical specialist input. This underlines the commitment to preserving ecological features and promoting biodiversity. The municipality also requested the access road to be moved as well as the open space be enlarged. This has resulted to this preferred alternative layout.

Figure 6: Preferred layout for the development

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

ALTERNATIVE LAYOUT 1

The location of the development footprint in Alternative 1 mirror those of the preferred layout, but quite differ in size. The orientation and size of the private open space is largely different. There is a relatively smaller area of approximately 551 m^2 designated for open space for alternative 1 compared to the preferred layout (alternative 2), however the anticipated impacts are not expected to be significantly different. The clearance of vegetation in this alternative will result into the loss of higher footprint of sensitive habitats than the preferred alternative. The milkwood trees have not been surveyed or overlayed for this alternative and is not informed by the specialist.

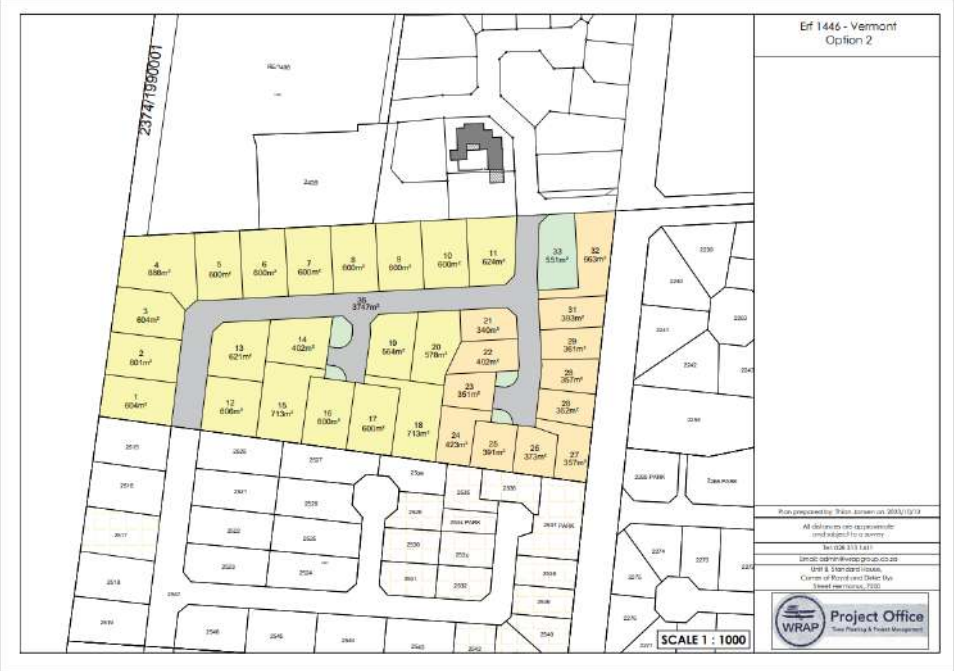


Figure 7: Alternative 1

ALTERNATIVE LAYOUT 3 (No-Go):

The no-go alternative entails refraining from constructing the development altogether. While this option would avoid all potential ecological impacts associated with the development, it would also forego the potential benefits such as job creation and economic activity generation.

Although the no-go alternative would mitigate direct (construction phase) ecological impacts, its potential negative impacts, including visual and noise disturbances, remain significant. However, it is important to note that this alternative would eliminate the potential benefits of the development.

Overall, the no-go alternative preferably offers high positive impact for due to its lower direct ecological impact during the construction phase. However, it must be weighed against the missed opportunities for job creation and economic activity generation.

Comparative Analysis:

- The preferred alternative (Alternative 2) offers slightly reduced ecological impact compared to Alternative 1, while also providing marginally more open space.

Provide a motivation for the preferred design or layout alternative.

In line with the town planning requirements, need and desirability as well as the terrestrial impact assessment report relative to the location of the milkwood trees, alternative 2 is the preferred alternative. The motivation behind choosing the preferred design or layout alternative is rooted in its capacity to seamlessly blend residential development with ecological conservation, aligning with zoning regulations, and upholding sustainability principles. Additionally, the preferred alternative is also informed by the municipality in which they requested the access road be moved as well as the open space be enlarged. Therefore, the preferred alternative 2 offers more suitable options regarding the larger footprint of the private open space and consideration of the milkwood trees.

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

N/A

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

Alternative 2: Preferred

There are potential impacts associated with the layout alternatives on the environment. Layout Alternatives 2 (preferred) and Alternative 1 will have the same similar positive impacts.

Positive Impacts

- The inclusion of a large open space (1081 m^2) along the ESA demonstrates a commitment to preserving critical biodiversity and natural features.
- The incorporation of open spaces within the development provides opportunities for recreation, benefiting the well-being of residents.
- The design's consideration for critical species in the ESA positively impacts local biodiversity.

Negative Impacts

- Extensive vegetation clearance, although within a highly transformed landscape, will still occur, leading to potential biodiversity loss, soil erosion, and disruption of ecosystems.
- Allocating a substantial portion to open space might limit available land for housing units, potentially affecting the economic viability of the development.
- Some residents may prefer larger housing units or other amenities over extensive open spaces, potentially leading to dissatisfaction.

Alternative 1

Negative Impacts:

- The alternative involves small area of about 561 m^2 designated for an open space for recreational services, potentially leading to a decrease in recreational opportunities for residents.
- A smaller allocation for open space along the ESA suggests a greater impact on this critical ecological area compared to the preferred layout.
- The reduction in open space may negatively affect biodiversity, as there may be less room for critical species to thrive.

Alternative 3 (NO-GO)

Positive
- No ecological impact or loss of sensitive species of plants and fauna
- There will be more room left for the endangered species of plants found in ONA.

Negative
- No job opportunities and investments.
- No provision of new housing to accommodate the growing population.

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

Provide a description of the preferred technology alternative:

The newest technology will be explored to reduce ecological impacts, waste generation and energy use.

Provide a description of any other technology alternatives investigated.

N/A

Provide a motivation for the preferred technology alternative.

N/A

Provide a detailed motivation if no alternatives exist.

While the developer prioritizes responsible development practices, no specific alternative construction technologies were explicitly explored for this project. However, the final design and construction methods outlined in the EMPr will incorporate best practices and readily available technologies that minimize environmental impact, considering factors like resource efficiency, waste reduction, and sustainability.

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

Positive:

- Energy-saving lighting equipment
- Reducing energy consumption
- Environmentally friendly and eco-friendly

Negative:

- Aircons- while air conditioning systems cool indoor spaces, they release heat into the external environment, potentially contributing to localized heat effects and increasing overall environmental impacts.

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

Provide a description of the preferred operational alternative.

The preferred operational alternative for the proposed residential development in Erf 1446, Vermont, Overstrand Municipality involves the following measures to avoid negative impacts, mitigate unavoidable negative impacts, and maximize positive impacts:

Management of Open Spaces and Ecological Support Areas:
Open spaces, particularly those designated as Ecological Support Areas (ESA), need to be managed to keep them free of alien vegetation at all times. These areas must be maintained in a natural state as much as possible. No permanent infrastructure will be permitted in these open spaces, and no dumping or stockpiling activities will be allowed.

Management of Private Gardens:
Private gardens within the development should be indigenous, with limited hardened surfaces and areas. Gardens are required to be kept free of alien vegetation. Aggressive lawns and gardens should be limited to minimize negative impacts.

Fauna Protection:
Based on the botanical specialist's view, animals will be impacted which are those that are slow or reluctant to move during clearing, including Breviceps frogs (if present), Angulate Tortoise, dune snails (Trigonephrus)

and the fossorial animals (including invertebrates). The overall ecological significance of this direct vegetation and faunal habitat loss on-site is Medium negative before mitigation. No clear mitigation seems possible in this case other than faunal Search and Rescue and survey and avoidance of all large milkwoods (Sideroxylon inerme). If this is done the direct impacts could be very slightly reduced but would still best be assessed as Medium negative impact.

Energy Efficiency Measures:
Design and construction practices will incorporate energy-efficient measures to minimize the environmental impact associated with energy consumption during the operational phase. This may include the use of energy-efficient appliances, lighting, and renewable energy sources where feasible.

Waste Management:
The operational phase will involve waste management practices that include regular collection by the municipality. Recycling activities will be conducted at the dumping site to reduce the environmental impact of waste disposal. On site waste separation and sorting at the household level must be encouraged.

Landscaping Strategies:
Landscaping strategies will be implemented to minimize the visual impact of construction and operational activities. This may involve the use of native vegetation in landscaping to maintain a natural feel and reduce visual disruptions. Indigenous landscaping is recommended and is also the waterwise option.

Environmental Monitoring:
Continuous environmental monitoring will be carried out to assess and manage potential impacts during the operational phase. This includes monitoring open spaces, ESA, and other sensitive areas to ensure ongoing protection and conservation efforts.

Provide a description of any other operational alternatives investigated.

No other operational alternatives investigated.

Provide a motivation for the preferred operational alternative.

The preferred operational alternative for the proposed residential development in Erf 1446, Vermont, Overstrand Municipality has been carefully chosen to align with environmental conservation principles and sustainable development practices, whilst meeting the needs of the community and aligning with the required planning parameters. The motivation for this preferred operational alternative includes several key considerations:

- The management of open spaces and ecological support areas reflects a commitment to preserving the natural environment within and around the development. By keeping these areas free of alien vegetation, avoiding permanent infrastructure, and prohibiting dumping, the development seeks to maintain ecological integrity.
- Specific measures, such as replanting sensitive plant species in open spaces, contribute to biodiversity protection. The inclusion of ecological support areas in the development plan acknowledges the importance of preserving and enhancing local flora and fauna.
- The incorporation of energy-efficient measures, such as the use of energy-efficient appliances and lighting, aligns with sustainable development goals. These practices aim to reduce the environmental footprint associated with energy consumption during the operational phase.
- Waste management practices, including regular collection and recycling activities, demonstrate a commitment to responsible waste disposal. By engaging in recycling at the dumping site, the development contributes to minimizing the environmental impact of waste.

- The prohibition of feeding wild animals and the avoidance of poisons or traps demonstrate a commitment to wildlife protection. Engaging professional help for addressing 'problem' animals ensures that fauna is treated with care and expertise.
- Landscaping strategies and the use of native vegetation aim to minimize the visual impact of construction and operational activities. This consideration helps in maintaining the aesthetic appeal of the area and reducing disruptions to the natural landscape.
- The commitment to continuous environmental monitoring reflects a proactive approach to address any emerging issues during the operational phase. This adaptability ensures that the development remains in compliance with environmental regulations and standards.

Provide a detailed motivation if no alternatives exist.

The chosen approach is deemed the most suitable or practical based on various considerations.

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

Positive impacts

- Investment opportunities for people wanting to invest in property will prevail.
- Provision of housing for families or individuals relocating in the area and looking to buy a house.

Negative impacts

- Operational phase impacts will take effect as soon as any of the natural vegetation and faunal habitat on the site is lost or disturbed, and will persist in perpetuity, or as long as those areas are not rehabilitated.
- The main operational phase impact would be loss of current moderate levels of ecological connectivity across the site (essentially only W-E connectivity now available), and associated habitat fragmentation. This will affect both fauna and flora on the site.
- Overall the operational phase ecological impacts of the proposed development here are likely to be Medium negative before and after mitigation.
- The cumulative impacts in the region are loss of natural vegetation and faunal habitat and threatened plant species to ongoing agriculture, urban development and alien plant invasion.

1.6.	The option of not implementing the activity (the 'No-Go' Option).

Provide an explanation as to why the 'No-Go' Option is not preferred.

The 'No-Go' Option, which involves not implementing the proposed development activity, is not the preferred choice due to several reasons:

- The 'No-Go' Option would result in a lack of job opportunities associated with the proposed development. The construction and operational phases of the development would generate employment opportunities, contributing to economic growth and improved livelihoods for individuals in the community.
- The absence of the proposed development could lead to a negative impact on socioeconomic dynamics, potentially hindering local economic development initiatives.
- The development of residential erven is aligned with the community's need for housing, and not implementing the project would contribute to a shortage of housing options.
- The absence of the proposed development may lead to challenges in meeting the growing housing demand in the area, potentially affecting the overall social well-being of the community.

- From the developer's standpoint, not proceeding with the project means a missed opportunity for investment and potential economic gain. The 'No-Go' Option may not align with the developer's goals and aspirations, impacting their ability to contribute to community development and economic growth.
- The proposed development is likely to bring about positive changes in the community, including improved infrastructure, increased housing options, and potential economic investments.
- The absence of the proposed development may result in missed opportunities for community development and enhancement.

1.7.	Provide and explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.

There are no other alternatives identified to avoid the negative impacts associated with the proposed development.

1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.

The preferred alternative for the proposed development is Alternative 2, as it demonstrates significant positive socioeconomic impacts, including job creation, economic growth, and housing investment opportunities. This alternative aligns with environmental regulations and guidelines, addressing potential negative impacts through carefully crafted mitigation measures. The preferred location for the activity is on Erf 1446, owned by the applicant, encompassing the development of 33 residential erven, road infrastructure, parking facilities, and open spaces. This location ensures responsible land use practices, fostering sustainable development within the existing urban area of Hermanus, particularly in Vermont.

2. "No-Go" areas

Explain what "no-go" area(s) have been identified during identification of the alternatives and provide the co-ordinates of the "no-go" area(s).

During the identification of alternatives, no "no-go" areas have been identified within the property. The specialist assessment reports conducted as part of the evaluation process have not highlighted any specific areas deemed unsuitable or restricted for the proposed development. Therefore, there are no coordinates associated with "no-go" areas on the property, as the assessments have not identified such constraints.

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

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

An impact is any change to a resource or receptor brought about by a project component or through the execution of a project related activity. The evaluation of baseline data provides information for the process of evaluating and describing how the project could affect the biophysical and socio-economic environment.

Impact is described according to their nature or type, as follows:

Nature/ Type

Nature/ Type of impact	Definition
Positive	

	An impact that is considered to represent an improvement on the baseline or introduces a positive change.
Negative	An impact that is considered to represent an adverse change from the baseline, or introduces a new undesirable factor.
Direct	Impacts that result from a direct interaction between a planned project activity and the receiving environment/receptors (e.g. between occupation of a site and the pre-existing habitats or between an effluent discharge and receiving water quality).
Indirect	Impacts that result from other activities that are encouraged to happen as a consequence of the Project (e.g. in-migration for employment placing a demand on resources).
Cumulative	Impacts that act together with other impacts (including those from concurrent or planned future third-party activities) to affect the same resources and/or receptors as the Project.

Significance

Impacts are described in terms of significance. Significance is a function of the magnitude of the impact and the likelihood of the impact occurring:

Impact Magnitude	
Extent	**On site** – impacts that are limited to the boundaries of the development site.
	Local – impacts that affect an area in a radius of 20 km around the Development site.
	Regional – impacts that affect regionally important environmental resources or are experienced at a regional scale as determined by administrative boundaries, habitat type/ecosystem.
	National – impacts that affect nationally important environmental resources or affect an area that is nationally important/ or have macro-economic consequences
Duration	**Temporary** – impacts are predicted to be of short duration and intermittent/occasional.
	Short-term – impacts that are predicted to last only for the duration of the construction period.
	Long-term – impacts that will continue for the life of the Project but ceases when the project stops operating

	Permanent – impacts that cause a permanent change in the affected receptor or resource (e.g. removal or destruction of ecological habitat) that endures substantially beyond the project lifetime
	BIOPHYSICAL ENVIRONMENT
	Negligible – the impact on the environment is not detectable.
	Low – the impact affects the environment in such a way that natural functions and processes are not affected.
	Medium – where the affected environment is altered but natural functions and processes continue, albeit in a modified way.
Intensity	**High** – where natural functions or processes are altered to the extent that they will temporarily or permanently cease
	SOCIO-ECONOMIC
	Negligible – there is no perceptible change to people's livelihood
	Low - people/communities are able to adapt with relative ease and maintain pre-impact livelihoods
	Medium – people/communities are able to adapt with some difficulty and maintain pre-impact livelihoods but only with a degree of support
	High - affected people/communities will not be able to adapt to changes or continue to maintain pre-impact livelihoods.

Likelihood- the likelihood that an impact will occur

Likelihood	
Unlikely	The impact is unlikely to occur
Likely	The impact is likely to occur under the most conditions.
Definite	The impact will occur

Once an assessment is made of the magnitude and the likelihood, the impact significance is rated through a matrix process:

Significance				
Magnitude		Unlikely	Likely	Definite
	Negligence	Negligible	Negligible	Minor
	Low	Negligible	Minor	Minor
	Medium	Minor	Moderate	Moderate
	High	Moderate	Major	Major

Definition of significance:

Negligible	An impact of negligible significance (or an insignificant impact) is where a resource or receptor (including people) will not be affected in any way by a particular

	activity, or the predicted effect is deemed to be 'negligible'.
Minor	An impact of minor significance is one where an effect will be experienced, but the impact magnitude is small (with and without mitigation) and within accepted standards, and/or the receptor is of low sensitivity/value.
Moderate	An impact of moderate significance is one within accepted limits and standards. The emphasis for moderate impacts is on demonstrating that the impact has been reduced to a level that is as low as reasonably practicable. This does not necessarily mean that 'moderate' impacts have to be reduced to 'minor' impacts, but that moderate impacts are managed effectively and efficiently.
Major	An impact of major significance is one where an accepted limit or standard may be exceeded, or large magnitude impacts occur to highly valued / sensitive resource / receptors. A goal of the EIA process is to get to a position where the Project does not have any major residual impacts.

Significance of an impact is then qualified through a statement of the degree of confidence. Degree of confidence is expressed as low, medium or high.

Significance colour scale (if applicable):

Negative	Positive
Negligible	Negligible
Minor	Minor
Moderate	Moderate
Major	Major

Impact rating colour scale:

Negative	Positive
Negligible	Negligible
Low	Low
Medium	Medium
High	High

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

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

ALTERNATIVE 1

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**1. Socio-economic**
Potential impact	Job creation during the development /construction phase of the Erven
Nature of impact:	Positive
Extent and duration of impact:	local; short-term
Consequence of impact or risk:	Improved livelihoods of the community
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	N/A
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Job creation for local community
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Positive
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	1. Ensure labour force is sourced locally as far as possible. 2. A gender balance to be considered during employment.
Residual impacts:	1. Improved livelihoods 2. Improvement of local economy, skills transfer, investment in the area
Cumulative impact post mitigation:	Job creation and skills transfer to local community
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Positive
Potential impact and risk:	**2. Dust**
Potential impact	Dust generated from site clearing and site preparation
Nature of impact:	Negative
Extent and duration of impact:	Local, short term
Consequence of impact or risk:	Visual impacts

	Nuisance for residents adjacent to the site
Probability of occurrence:	Likely
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	High
Indirect impacts:	Potential for reduced visibility, temporary visual impacts to the general area
Cumulative impact prior to mitigation:	Dust may be generated as a result of earthmoving activities required for construction and development
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium High, High, or Very-High)	High negative
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	1. Maintain ground cover for as long as possible to reduce the total surface area exposed to wind. Do not clear entire plots and rather clear building sites only 2. Ensure vehicle speed limits on site are kept to a minimum. 3. Delivery vehicles to keep loads covered. 4. Cover fine material stockpiles. 5. Wet dry and dusty surfaces using non-potable water. 6. Staff to wear correct PPE if dust is generated for long periods. 7. Road surfaces to be swept and kept clean of sand and fine materials
Residual impacts:	None
Cumulative impact post mitigation:	Dust generated during construction, mitigation successful
Significance rating of impact after mitigation (e.g. Low, Medium, MediumHigh, High, or Very-High)	Very-Low Negative
Potential impact and risk:	**3. Noise**
Potential impact	Noise generated from vehicles and machinery during the construction phase.
Nature of impact:	Negative
Extent and duration of impact:	Local, short term
Consequence of impact or risk	Noise disturbance to transient receptors, i.e. motorists, pedestrians, residents.
Probability of occurrence:	Likely
Degree to which the impact may cause irreplaceable loss of resources:	No resources will be impacted.
Degree to which the impact can be reversed:	High
Indirect impacts:	None
Cumulative impact prior to mitigation:	Noise generated from construction works
Significance rating of impact prior to mitigation (e.g. Low, Medium, MediumHigh, High, or Very-High)	High negative

Degree to which the impact can be avoided:	Medium – High
Degree to which the impact can be managed:	Medium – High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	1. Limit noise levels (e.g. install and maintain silencers on machinery). 2. Provide protective wear for workers i.e. ear plugs. 3. Ensure that construction vehicles and machinery are maintained regularly to reduce noise generation. 4. Restrict construction to normal working hours
Residual impacts:	None
Cumulative impact post mitigation:	Typical noise impacts associated with a construction site
Significance rating of impact after mitigation (e.g. Low, Medium, Medium High, High, or Very-High)	Low Negative
Potential impact and risk:	**4. Visual**
Potential impact:	Visual impacts of construction site and construction activities.
Nature of impact:	Negative
Extent and duration of impact:	Local, short term
Consequence of impact:	Reduce aesthetic value of the site and surrounds
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	High
Indirect impacts:	None
Cumulative impact prior to mitigation:	Short term visual impacts associated with construction
Significance rating of impact prior to mitigation (e.g. Low, Medium, MediumHigh, High, or Very-High)	High negative
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	1. Good housekeeping of construction site and working areas. 2. Screen the visual elements of the site camp with netting. 3. Locate the site camp in a transformed area. 4. Site officer to walk the site on a daily basis to check for visual impacts and general site aesthetics, particularly prior to weekends and holidays 5. Officer to ensure that waste and batching areas are correctly screened and secured to prevent spread by wind, rain or animals
Residual impacts	None
Cumulative impact post mitigation:	Typical visual impacts associated with a construction site
Significance rating of impact after mitigation e.g. Low, Medium, MediumHigh, High, or Very-High)	Low Negative
Potential impact and risk:	**5. Ecological Impact**
Potential impact:	During the removal of vegetation for the proposed subdivision and development would be permanent loss

	of all or most of the existing natural and partly natural vegetation and faunal habitat in the development footprints (most of it gazetted as Endangered vegetation type).
Nature of impact:	Negative
Extent and duration of impact:	Local, Regional; Permanent
Consequence of impact:	Vegetation loss, species loss, diversity loss, connectivity loss Exposure of soil and degradation thereof
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium
Degree to which the impact can be reversed:	Low
Indirect impacts:	Continued loss of Overberg Dune Strandveld (Endangered)
Cumulative impact prior to mitigation:	Loss of natural vegetation and faunal habitat and threatened plant species to ongoing agriculture, urban development and alien plant invasion
Significance rating of impact prior to mitigation (e.g. Low, Medium, MediumHigh, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	• All milkwoods (*Sideroxylon inerme*) above 1m and many of the other indigenous trees on site taller than 1m have been surveyed and shown in Figure 1b of the terrestrial biodiversity assessment report. It is understood that some (maybe 35%) of these will be lost to road and bulk service development, but the others should remain and survive within designated erven, although another 50% may be lost during house development. The applicant must obtain the relevant permits if any milkwoods (a Protected Species) are to be damaged or lost during the site development process, and subsequently by new erf owners if during the construction phase. • Search and Rescue must be undertaken for all reptiles and any other fauna, notably tortoises and chameleons, during the site preparation, and especially when any earthworks and trenches are being dug or left open. This should be undertaken by an appointed ECO on a daily basis, until the site has been cleared (apart from the milkwoods and other designated trees) and the services are installed. Rescued animals should be released inside the adjacent Hoek van der Berg Nature Reserve (with relevant permission).

	• Search and Rescue for all translocatable geophytes should be undertaken prior to site development. Suitable candidates include about 500 *Chasmanthe aethiopica* (cobraflower) bulbs, and about ten *Haemanthus coccineus* (poeierkwas). These should be translocated to similar habitat in the adjacent Hoek van de Berg NR, after permission has been obtained to do so.
Residual impacts	Loss of high sensitivity vegetation
Cumulative impact post mitigation:	Loss of high sensitivity vegetation
Significance rating of impact after mitigation e.g. Low, Medium, MediumHigh, High, or Very-High)	Medium negative

OPERATIONAL PHASE

Potential impact and risk:	**1. SOCIO ECONOMIC**
Potential impact:	Access to employment for the community during the operational phase, Job creation, Provision of residential erven in response to provincial demand, investment in the area
Nature of impact:	Positive
Extent and duration of impact:	Local, long-term
Consequence of impact:	Improved livelihoods beneficiaries, influx of people to the area, investment in the area, spending in the area
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	N/A
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Access to employment for the community during the operational phase, Job creation, Provision of residential erven in response to provincial demand, investment in the area
Significance rating of impact prior to mitigation (e.g. Low, Medium, MediumHigh, High, or Very-High)	High positive
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	-
Residual impacts	Investment in the area, attraction to the area, spending in the area
Cumulative impact post mitigation:	Investment in the area, attraction to the area, spending in the area Access to employment for the community during the operational phase, Job creation, Provision of residential erven in response to provincial demand, investment in the area
Significance rating of impact after mitigation e.g. Low, Medium, Medium High, High, or Very-High)	High positive

Potential impact and risk:	**2. Visual**
Potential impact:	Typical Visual impacts associated with the operational phase of a residential dwelling or group of residential dwellings that may lead to changes in sense of place of the individual from what was there and to what has now changed.
Nature of impact:	Negative – changes in the visual aesthetics of the area during the operational phase. Positive- infill development within an urban area as opposed to the alienation of new land, contributing to more sustainable land use.
Extent and duration of impact:	Long term, local to regional
Consequence of impact:	Risk – visual impact of operation within landscape and suburb
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	High
Indirect impacts:	Loss of sense of place due to the removal of the natural vegetation that is appealing to nature lovers
Cumulative impact prior to mitigation:	Short term impacts associated with changes of the built infrastructure.
Significance rating of impact prior to mitigation (e.g. Low, Medium, MediumHigh, High, or Very-High)	High negative
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	High
Proposed mitigation:	• Implement landscaping strategies to minimize the visual impact of construction and operational activities. • Incorporate green design principles into the development to enhance aesthetics and mitigate negative visual effects. • Communicate with the community to ensure understanding and acceptance of the changes in the visual character. • Consider the use of native vegetation in landscaping to maintain a natural feel and reduce visual disruptions.
Residual impacts	None
Cumulative impact post mitigation:	Typical visual impacts associated with operational phase
Significance rating of impact after mitigation e.g. Low, Medium, MediumHigh, High, or Very-High)	Low negative

Potential impact and risk:	3. Botanical
Potential impact:	According to the SA Vegetation Map the original natural vegetation in the study area is mostly Overberg Dune Strandveld, with a transition to Hangklip Sand Fynbos in the northeast corner. The desktop analysis illustrates the small portion of the study area as of Very High botanical sensitivity, as the result of the underlying vegetation type (Overberg Dune Strandveld) that is gazetted as Endangered on a national basis (but has at least 36% of its original extent formally conserved), and a small section of Hangklip Sand Fynbos found on the North-East corner of the property. The vegetation on site is considered to be essentially pristine, and characterized by high alien vegetation, and no CBAs are located in the study area. As per picture below, parts of the ecological support areas have been developed. The larger portion of the site is not within sensitive area and should be authorised for development. Some habitat lost is acceptable. 
Nature of impact:	Negative
Extent and duration of impact:	Long term, local to regional
Consequence of impact:	Loss of high sensitivity vegetation
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Vegetation loss – high
Degree to which the impact can be reversed:	Low
Indirect impacts:	Loss of sensitive vegetation areas
Cumulative impact prior to mitigation:	Risk of alien vegetation due to landscaping and poor Management Loss of natural spaces, corridors and vegetation
Significance rating of impact prior to mitigation (e.g. Low, Medium, MediumHigh, High, or Very-High)	High
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	• All milkwoods (*Sideroxylon inerme*) above 1m and many of the other indigenous trees on site taller than 1m have been surveyed and shown in Figure 1b of the terrestrial biodiversity assessment. It is understood

	that some (maybe 35%) of these will be lost to road and bulk service development, but the others should remain and survive within designated erven, although another 50% may be lost during house development. The applicant must obtain the relevant permits if any milkwoods (a Protected Species) are to be damaged or lost during the site development process, and subsequently by new erf owners if during the construction phase. • Search and Rescue for all translocatable geophytes should be undertaken prior to site development. Suitable candidates include about 500 Chasmanthe aethiopica (cobraflower) bulbs, and about ten Haemanthus coccineus (poeierkwas). These should be translocated to similar habitat in the adjacent Hoek van de Berg NR, after permission has been obtained to do so.
Residual impacts	Loss of sensitive vegetation, open spaces, corridors
Cumulative impact post mitigation:	Loss of highly sensitive vegetation
Significance rating of impact after mitigation e.g. Low, Medium, MediumHigh, High, or Very-High)	Medium negative
Potential impact and risk:	**4. Ecological**
Potential impact:	Loss of current moderate levels of ecological connectivity across the site (essentially only W-E connectivity is now available), and associated habitat fragmentation. Loss of ability for natural fires Loss of sensitive botanical areas and vegetation Reduction in natural habitat
Nature of impact:	Negative – ecological impacts Positive – infill development within urban area as opposed to alienation of new land
Extent and duration of impact:	Permanent, local to regional
Consequence of impact:	Risk of alien vegetation due to landscaping and poor Management Loss of natural spaces, corridors and vegetation
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium
Degree to which the impact can be reversed:	Medium
Indirect impacts:	Loss of moderate current ecological connectivity across the site and associated habitat fragmentation.
Cumulative impact prior to mitigation:	Risk of alien vegetation due to landscaping and poor Management Loss of natural spaces, corridors and vegetation
Significance rating of impact prior to mitigation (e.g. Low, Medium, MediumHigh, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	Medium

Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	• All milkwoods (Sideroxylon inerme) above 1m and many of the other indigenous trees on site taller than 1m have been surveyed and shown in Figure 1b of the terrestrial biodiversity assessment. It is understood that some (maybe 35%) of these will be lost to road and bulk service development, but the others should remain and survive within designated erven, although another 50% may be lost during house development. The applicant must obtain the relevant permits if any milkwoods (a Protected Species) are to be damaged or lost during the site development process, and subsequently by new erf owners if during the construction phase. • Search and Rescue must be undertaken for all reptiles and any other fauna, notably tortoises and chameleons, during the site preparation, and especially when any earthworks and trenches are being dug or left open. This should be undertaken by an appointed ECO on a daily basis, until the site has been cleared (apart from the milkwoods and other designated trees) and the services are installed. Rescued animals should be released inside the adjacent Hoek van der Berg Nature Reserve (with relevant permission). • Search and Rescue for all translocatable geophytes should be undertaken prior to site development. Suitable candidates include about 500 Chasmanthe aethiopica (cobraflower) bulbs, and about ten Haemanthus coccineus (poeierkwas). These should be translocated to similar habitat in the adjacent Hoek van de Berg NR, after permission has been obtained to do so.
Residual impacts	Loss of sensitive vegetation, open spaces, corridors
Cumulative impact post mitigation:	Risk of alien vegetation due to landscaping and poor Management Loss of natural spaces, corridors and vegetation
Significance rating of impact after mitigation e.g. Low, Medium, MediumHigh, High, or Very-High)	Medium negative

DECOMMISSIONING PHASE:

Potential impact and risk:	Decommissioning is not applicable
Nature of impact:	-
Extent and duration of impact:	-
Consequence of impact or risk:	-
Probability of occurrence:	-
Degree to which the impact may cause irreplaceable loss of resources:	-

Degree to which the impact can be reversed:	-
Indirect impacts:	-
Cumulative impact prior to mitigation:	-
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-
Degree to which the impact can be avoided:	-
Degree to which the impact can be managed:	-
Degree to which the impact can be mitigated:	-
Proposed mitigation	-
Residual impacts:	-
Cumulative impact post mitigation:	-
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-

ALTERNATIVE 2: PREFERRED

Alternative: Alternative Design 2	
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**1. Socioeconomic impacts**
Potential impact	Job creation during the development /construction phase of the Erven
Nature of impact:	Positive
Extent and duration of impact:	Local; short term
Consequence of impact or risk:	Improved livelihoods of the community
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	N/A
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Job creation for local community
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Positive
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	1. Ensure labour force is sourced locally as far as possible. 2. A gender balance to be considered during employment.
Residual impacts:	1. Improved livelihoods 2. Improvement of local economy, skills transfer, investment in the area
Cumulative impact post mitigation:	Job creation and skills transfer to local community
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High Positive**

Potential impact and risk:	**2. Dust**
Potential impact	Dust generated from site clearing and site preparation
Nature of impact:	Negative
Extent and duration of impact:	Local, short term
Consequence of impact or risk:	Visual impacts Nuisance for residents adjacent to the site
Probability of occurrence:	Likely
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	High
Indirect impacts:	Potential for reduced visibility, temporary visual impacts to the general area
Cumulative impact prior to mitigation:	Dust may be generated as a result of earthmoving activities required for construction and development
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High negative
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	1. Maintain ground cover for as long as possible to reduce the total surface area exposed to wind. Do not clear entire plots and rather clear building sites only 2. Ensure vehicle speed limits on site are kept to a minimum. 3. Delivery vehicles to keep loads covered. 4. Cover fine material stockpiles. 5. Wet dry and dusty surfaces using non-potable water. 6. Staff to wear correct PPE if dust is generated for long periods. 7. Road surfaces to be swept and kept clean of sand and fine materials
Residual impacts:	None
Cumulative impact post mitigation:	Dust generated during construction; mitigation successful
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-Low Negative
Potential impact and risk:	**3. Noise**
Potential impact	Noise generated from vehicles and machinery during the construction phase.
Nature of impact:	Negative
Extent and duration of impact:	Local, short term
Consequence of impact or risk:	Noise disturbance to transient receptors, i.e. motorists, pedestrians, residents.
Probability of occurrence:	Likely
Degree to which the impact may cause irreplaceable loss of resources:	No resources will be impacted.
Degree to which the impact can be reversed:	High
Indirect impacts:	None
Cumulative impact prior to mitigation:	Noise generated from construction works

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High negative
Degree to which the impact can be avoided:	Medium – High
Degree to which the impact can be managed:	Medium – High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	1. Limit noise levels (e.g. install and maintain silencers on machinery). 2. Provide protective wear for workers i.e. ear plugs. 3. Ensure that construction vehicles and machinery are maintained regularly to reduce noise generation. 4. Restrict construction to normal working hours
Residual impacts:	None
Cumulative impact post mitigation:	Typical noise impacts associated with a construction site
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low Negative**
Potential impact and risk:	**4. Visual**
Potential Impact	Visual impacts of construction site and construction activities.
Nature of impact:	Negative
Extent and duration of impact:	Local, short term
Consequence of impact or risk:	Reduce aesthetic value of the site and surrounds
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	High
Indirect impacts:	None
Cumulative impact prior to mitigation:	Short term visual impacts associated with construction
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High negative
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	1. Good housekeeping of construction site and working areas. 2. Screen the visual elements of the site camp with netting. 3. Locate the site camp in a transformed area. 4. Site officer to walk the site on a daily basis to check for visual impacts and general site aesthetics, particularly prior to weekends and holidays 5. Officer to ensure that waste and batching areas are correctly screened and secured to prevent spread by wind, rain or animals
Residual impacts:	None
Cumulative impact post mitigation:	Typical visual impacts associated with a construction site
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative
Potential impact and risk:	**5. Ecological Impact**
Potential impact:	During the removal of vegetation for the proposed subdivision and development would be permanent loss of

	all or most of the existing natural and partly natural vegetation and faunal habitat in the development footprints (most of it gazetted as Endangered vegetation type).
Nature of impact:	Negative
Extent and duration of impact:	Local, Regional; Permanent
Consequence of impact:	Vegetation loss, species loss, diversity loss, connectivity loss Exposure of soil and degradation thereof
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium
Degree to which the impact can be reversed:	Low
Indirect impacts:	Continued loss of Overberg Dune Strandveld (Endangered)
Cumulative impact prior to mitigation:	Loss of natural vegetation and faunal habitat and threatened plant species to ongoing agriculture, urban development and alien plant invasion
Significance rating of impact prior to mitigation (e.g. Low, Medium, MediumHigh, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	• All milkwoods (*Sideroxylon inerme*) above 1m and many of the other indigenous trees on site taller than 1m have been surveyed and shown in Figure 1b of the terrestrial biodiversity assessment. It is understood that some (maybe 35%) of these will be lost to road and bulk service development, but the others should remain and survive within designated erven, although another 50% may be lost during house development. The applicant must obtain the relevant permits if any milkwoods (a Protected Species) are to be damaged or lost during the site development process, and subsequently by new erf owners if during the construction phase. • Search and Rescue must be undertaken for all reptiles and any other fauna, notably tortoises and chameleons, during the site preparation, and especially when any earthworks and trenches are being dug or left open. This should be undertaken by an appointed ECO on a daily basis, until the site has been cleared (apart from the milkwoods and other designated trees) and the services are installed. Rescued animals should be released inside the adjacent Hoek van der Berg Nature Reserve (with relevant permission). • Search and Rescue for all translocatable geophytes should be undertaken prior to site development.

	Suitable candidates include about 500 *Chasmanthe aethiopica* (cobraflower) bulbs, and about ten *Haemanthus coccineus* (poeierkwas). These should be translocated to similar habitat in the adjacent Hoek van de Berg NR, after permission has been obtained to do so. • Given that relatively little mitigation is possible and that quite substantial biodiversity will still be lost (even if not of High or Medium negative significance) it is recommended that the applicant make a sizeable conservation contribution (donation) to a local conservation group (Vermont – Hermanus area) that is involved with alien invasive vegetation management and control, as this is a major threat to the remaining habitat in the region.	
Residual impacts	Loss of high sensitivity vegetation	
Cumulative impact post mitigation:	Loss of high sensitivity vegetation	
Significance rating of impact after mitigation e.g. Low, Medium, MediumHigh, High, or Very-High)	Low negative	Medium negative
OPERATIONAL PHASE		
Potential impact and risk:	**1. Socioeconomic**	
Potential Impact	Access to employment for the community during the operational phase, Job creation, Provision of residential erven in response to provincial demand, investment in the area	
Nature of impact:	Positive	
Extent and duration of impact:	Local; long term	
Consequence of impact or risk:	Improved livelihoods beneficiaries, influx of people to the area, investment in the area, spending in the area	
Probability of occurrence:	Definite	
Degree to which the impact may cause irreplaceable loss of resources:	N/A	
Degree to which the impact can be reversed:	N/A	
Indirect impacts:	N/A	
Cumulative impact prior to mitigation:	Access to employment for the community during the operational phase, Job creation, Provision of residential erven in response to provincial demand, investment in the area	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High positive	
Degree to which the impact can be avoided:	N/A	
Degree to which the impact can be managed:	High	
Degree to which the impact can be mitigated:	N/A	
Proposed mitigation:	-	
Residual impacts:	Investment in the area, attraction to the area, spending in the area	
Cumulative impact post mitigation:	Investment in the area, attraction to the area, spending in the area Access to employment for the community during the operational phase, Job creation, Provision of residential	

	erven in response to provincial demand, investment in the area
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High positive
Potential impact and risk:	**2. Visual Impact**
Potential Impact	Typical Visual impacts associated with the operational phase of a residential dwelling or group of residential dwellings that may lead to changes in sense of place of the individual from what was there and to what has now changed.
Nature of impact:	Negative – changes in the visual aesthetics of the area during the operational phase. Positive- infill development within an urban area as opposed to the alienation of new land, contributing to more sustainable land use.
Extent and duration of impact:	Long term, local to regional
Consequence of impact or risk:	Risk – visual impact of operation within landscape and suburb
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	High
Indirect impacts:	Loss of sense of place due to the removal of the natural vegetation that is appealing to nature lovers
Cumulative impact prior to mitigation:	Short term impacts associated with changes of the built infrastructure.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High negative
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	High
Proposed mitigation:	• Implement landscaping strategies to minimize the visual impact of construction and operational activities. • Incorporate green design principles into the development to enhance aesthetics and mitigate negative visual effects. • Communicate with the community to ensure understanding and acceptance of the changes in the visual character. • Consider the use of native vegetation in landscaping to maintain a natural feel and reduce visual disruptions.
Residual impacts:	None
Cumulative impact post mitigation:	Typical visual impacts associated with operational phase
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low negative

Potential impact and risk:	3. Botanical
Potential impact:	The desktop analysis illustrates the small portion of the study area as of Very High botanical sensitivity, as the result of the underlying vegetation type (Overberg Dune Strandveld) that is gazetted as Endangered on a national basis (but has at least 36% of its original extent formally conserved), and a small section of Hangklip Sand Fynbos found on the North-East corner of the property. The vegetation on site is considered to be essentially pristine, and characterized by high alien vegetation, and no CBAs are located in the study area. As per picture below, parts of the ecological support areas have been developed. The larger portion of the site is not within sensitive area and should be authorised for development. Some habitat lost is acceptable. 
Nature of impact:	Negative
Extent and duration of impact:	Long term, local to regional
Consequence of impact:	Loss of high sensitivity vegetation
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Vegetation loss – high
Degree to which the impact can be reversed:	Low
Indirect impacts:	Loss of sensitive vegetation areas
Cumulative impact prior to mitigation:	Risk of alien vegetation due to landscaping and poor Management Loss of natural spaces, corridors and vegetation
Significance rating of impact prior to mitigation (e.g. Low, Medium, MediumHigh, High, or Very-High)	High
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	• All milkwoods (Sideroxylon inerme) above 1m and many of the other indigenous trees on site taller than 1m have been surveyed and shown in Figure 1b of the terrestrial biodiversity assessemnt. It is understood that some (maybe 35%) of these will be lost to road and bulk service development, but the others should

	remain and survive within designated erven, although another 50% may be lost during house development. The applicant must obtain the relevant permits if any milkwoods (a Protected Species) are to be damaged or lost during the site development process, and subsequently by new erf owners if during the construction phase. • Search and Rescue for all translocatable geophytes should be undertaken prior to site development. Suitable candidates include about 500 Chasmanthe aethiopica (cobraflower) bulbs, and about ten Haemanthus coccineus (poeierkwas). These should be translocated to similar habitat in the adjacent Hoek van de Berg NR, after permission has been obtained to do so, and should be undertaken by someone with experience in plant translocations. • Given that relatively little mitigation is possible and that quite substantial biodiversity will still be lost (even if not of High or Medium negative significance) it is recommended that the applicant make a sizeable conservation contribution (donation) to a local conservation group (Vermont – Hermanus area) that is involved with alien invasive vegetation management and control, as this is a major threat to the remaining habitat in the region.
Residual impacts	Loss of sensitive vegetation, open spaces, corridors
Cumulative impact post mitigation:	Loss of highly sensitive vegetation
Significance rating of impact after mitigation e.g. Low, Medium, MediumHigh, High, or Very-High)	Low negative / Medium negative
Potential impact and risk:	**4. Ecological**
Potential impact:	Loss of current moderate levels of ecological connectivity across the site (essentially only W-E connectivity is now available), and associated habitat fragmentation. Loss of ability for natural fires Loss of sensitive botanical areas and vegetation Reduction in natural habitat
Nature of impact:	Negative – ecological impacts Positive – infill development within urban area as opposed to alienation of new land
Extent and duration of impact:	Permanent, local to regional
Consequence of impact:	Risk of alien vegetation due to landscaping and poor Management Loss of natural spaces, corridors and vegetation
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium

Degree to which the impact can be reversed:	Medium
Indirect impacts:	Loss of moderate current ecological connectivity across the site and associated habitat fragmentation.
Cumulative impact prior to mitigation:	Risk of alien vegetation due to landscaping and poor Management Loss of natural spaces, corridors and vegetation
Significance rating of impact prior to mitigation (e.g. Low, Medium, MediumHigh, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	• All milkwoods (*Sideroxylon inerme*) above 1m and many of the other indigenous trees on site taller than 1m have been surveyed and shown in Figure 1b of the terrestrial biodiversity assessment. It is understood that some (maybe 35%) of these will be lost to road and bulk service development, but the others should remain and survive within designated erven, although another 50% may be lost during house development. The applicant must obtain the relevant permits if any milkwoods (a Protected Species) are to be damaged or lost during the site development process, and subsequently by new erf owners if during the construction phase. • Search and Rescue must be undertaken for all reptiles and any other fauna, notably tortoises and chameleons, during the site preparation, and especially when any earthworks and trenches are being dug or left open. This should be undertaken by an appointed ECO on a daily basis, until the site has been cleared (apart from the milkwoods and other designated trees) and the services are installed. Rescued animals should be released inside the adjacent Hoek van der Berg Nature Reserve (with relevant permission). • Search and Rescue for all translocatable geophytes should be undertaken prior to site development. Suitable candidates include about 500 *Chasmanthe aethiopica* (cobraflower) bulbs, and about ten *Haemanthus coccineus* (poeierkwas). These should be translocated to similar habitat in the adjacent Hoek van de Berg NR, after permission has been obtained to do so, and should be undertaken by someone with experience in plant translocations. • Given that relatively little mitigation is possible and that quite substantial biodiversity will still be lost (even if not of High or Medium negative significance) it is recommended that the applicant make a sizeable conservation contribution (donation) to a local conservation group (Vermont – Hermanus area) that is involved with alien invasive vegetation management

	and control, as this is a major threat to the remaining habitat in the region.	
Residual impacts	Loss of sensitive vegetation, open spaces, corridors	
Cumulative impact post mitigation:	Risk of alien vegetation due to landscaping and poor Management Loss of natural spaces, corridors and vegetation	
Significance rating of impact after mitigation e.g. Low, Medium, MediumHigh, High, or Very-High)	Low negative	Medium negative
DECOMMISSIONING AND CLOSURE PHASE		
Potential impact and risk:	-	
Nature of impact:	-	
Extent and duration of impact:	-	
Consequence of impact or risk:	-	
Probability of occurrence:	-	
Degree to which the impact may cause irreplaceable loss of resources:	-	
Degree to which the impact can be reversed:	-	
Indirect impacts:	-	
Cumulative impact prior to mitigation:	-	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-	
Degree to which the impact can be avoided:	-	
Degree to which the impact can be managed:	-	
Degree to which the impact can be mitigated:	-	
Proposed mitigation:	-	
Residual impacts:	-	
Cumulative impact post mitigation:	-	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-	

ALTERNATIVE 3 (NO-GO)

Alternative:	
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	1. Socioeconomic impacts
Potential impact	No scope of available job creation, skills transfer and investments
Nature of impact:	Negative
Extent and duration of impact:	Local, short-term
Consequence of impact or risk:	No job creation for communities in the area. No opportunities for investment in the area or provision of residential erven for growth of the area.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	N/A
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	High
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	low
Degree to which the impact can be mitigated:	low
Proposed mitigation:	Change layout
Residual impacts:	N/A
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High negative- no development may take place
Potential impact and risk:	2. **Ecological**
Potential impact:	No major impacts on the terrestrial ecological support areas.
Nature of impact:	Positive
Extent and duration of impact:	Local; long term
Consequence of impact:	Risk of alien vegetation due to landscaping and poor Management Loss of other natural spaces, corridors and vegetation
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	High
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Risk of alien vegetation due to landscaping and poor Management Loss of natural spaces, corridors and vegetation
Significance rating of impact prior to mitigation	High

(e.g. Low, Medium, MediumHigh, High, or Very-High)	
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	by placing biodiversity offsets in areas of high ecological sensitivity during the construction.
Residual impacts	Loss of other natural vegetation and species
Cumulative impact post mitigation:	Less negative impacts associated with the clearance of sensitive vegetation.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High positive
OPERATIONAL PHASE	
Potential impact and risk:	1. Socioeconomic impacts
Potential impact	No access to employment for the community
Nature of impact:	Negative- few people employed
Extent and duration of impact:	Local to provincial, long term
Consequence of impact or risk:	Improved livelihood beneficiaries, low number of people to the area, few investment opportunities,
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	N/A
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	No employment or investments on the site because there will be no development taking place.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High negative
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	-
Residual impacts:	N/A
Cumulative impact post mitigation:	No access to jobs, no development and no investments
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High negative
Potential impact and risk:	2. **Ecological**
Potential impact:	Loss of a significant number of vegetation and species movement across and between the site The ability for natural fires Loss of endangered species of botanical and fauna.
Nature of impact:	Neutral – ecological impacts
Extent and duration of impact:	Variable, local to regional
Consequence of impact:	Risk of alien vegetation due to landscaping and poor Management
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium-Low
Degree to which the impact can be reversed:	Medium

Indirect impacts:	Loss of other natural vegetation
Cumulative impact prior to mitigation:	Risk of alien vegetation due to landscaping and poor Management Loss of natural spaces, corridors and vegetation
Significance rating of impact prior to mitigation (e.g. Low, Medium, MediumHigh, High, or Very-High)	Low negative
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	-
Residual impacts	Loss of sensitive vegetation, open spaces, corridors
Cumulative impact post mitigation:	Risk of alien vegetation due to landscaping and poor Management Loss of natural spaces such as ecological support areas (ESA), corridors and vegetation
Significance rating of impact after mitigation e.g. Low, Medium, MediumHigh, High, or Very-High)	High Positive
DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	-
Nature of impact:	-
Extent and duration of impact:	-
Consequence of impact or risk:	-
Probability of occurrence:	-
Degree to which the impact may cause irreplaceable loss of resources:	-
Degree to which the impact can be reversed:	-
Indirect impacts:	-
Cumulative impact prior to mitigation:	-
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-
Degree to which the impact can be avoided:	-
Degree to which the impact can be managed:	-
Degree to which the impact can be mitigated:	-
Proposed mitigation:	-
Residual impacts:	-
Cumulative impact post mitigation:	-
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

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

Summary of Findings and Influences on Proposed Development:

Terrestrial Biodiversity Assessment findings (Plant Species, Terrestrial Biodiversity and Animal Species Theme):

According to the botanical specialist findings, the original natural vegetation in the study area is mostly Overberg Dune Strandveld, with a transition to Hangklip Sand Fynbos in the northeast corner of the site (see Figure 3 on the terrestrial biodiversity report). The specialist's ground-truthing foretell that the entire site is currently best mapped as Overberg Dune Strandveld.

Overberg Dune Strandveld is now gazetted as Endangered on a national basis (Government of South Africa 2022), with about 95% of its total original extent remaining intact, about 36% conserved, and a national conservation target of 36% (Rouget et al 2004). The reason for the listing as Endangered is not habitat loss, but rather the restricted global distribution of this unit, and a fairly high level of threat (mostly from urban development and invasive alien vegetation). The unit supports a relatively low number of threatened and endemic plant species, and occurs on deep, nutrient poor, marine derived, alkaline or neutral soils in the area between here and Agulhas, and the vegetation type does not need fire for optimal ecological functioning (Helme et al 2016).

The Northeast corner of the property is covered by the Hangklip Sand Fynbos which is now gazetted as Critically Endangered on a national basis (Government of South Africa 2022), with less than 68% of its total original extent remaining intact, less than 18% conserved, and a national conservation target of 30% (Rouget et al 2004). The reason for the listing as Critically Endangered is also the restricted global distribution of this unit, and a fairly high level of threat (mostly from urban development and invasive alien vegetation). The unit does support a fairly high number of threatened and endemic plant species, and occurs on deep, nutrient poor, sandstone derived, acid soils in the area between Hangklip and Hermanus, and the vegetation type needs fire for optimal ecological functioning (Helme et al 2016).

A single plant Species of Conservation Concern (SoCC) was recorded during the survey, and no others are likely to persist here. About five plants of the buchu *Diosma subulata* (Vulnerable) were found deep within a rooikrans thicket in the centre of the site. These reseeding plants require fire for regeneration, and in the absence of fire on site for at least 20 years are unlikely to survive much longer, even if the site is not developed. The presence of these five plants is significant, as the species is now rare in the Hermanus area, but as noted, they are unlikely to survive on this site, even were it not to be developed, and they will not survive translocation or replanting either.

None of the many Redlisted plant species highlighted in the Screening Tool for this region are likely on site, given the habitat present. There is a 1982 record of *Haemanthus canaliculatus* (Endangered) from near Onrus Caravan Park, some 2km from this site.

No frogs are likely on site, due to the absence of wetlands, although *Breviceps montanus* could in theory be present, as it does not require water or wetlands.

Bradypodion pumilum (Cape Dwarf Chameleon) has been regularly recorded from similar nearby habitat (iNaturalist.org) and is likely to be present on site. This species is Redlisted as Vulnerable (Bates et al 2014).

No other Redlisted reptiles are likely to be present. The Southern Adder (*Bitis armata;* Vulnerable) has been flagged by the Screening Tool for the region, but is unlikely in this habitat. An Angulate Tortoise (*Chersina angulata*) was observed on site.

No bird SoCC are likely on site, and a typical selection of Dune Strandveld species was recorded, including Speckled Mousebird, Karoo Prinia, Southern Doublecollared Sunbird, Cape Bulbul, Cape Whiteye, Fiscal Flycatcher, Cape Spurfowl, Cape Robinchat and Boubou.

Mammals present or using the site (tracks and scat found, or live animals seen) include porcupine (Hystrix africaeaustralis), Striped Fieldmouse (*Rhabdomys pumilio*) and Cape Grey Mongoose (*Herpestes pulverulentus*), and other likely species include Large Grey Mongoose (*Herpestes ichneumon*), Caracal (*Caracal caracal*), and Cape Genet (*Genetta tigrina).* Some of these may occasionally be resident, but most probably reside mainly in the much larger adjacent Hoek van de Berg Nature Reserve

Construction Phase (Direct) Ecological Impacts

It can safely be assumed that the primary construction phase ecological impact of the proposed subdivision and development would be permanent loss of all or most of the existing natural and partly natural vegetation and faunal habitat in the development footprints (most of it gazetted as an Endangered vegetation type). One plant Species of Conservation Concern was recorded within the site (*Diosma subulata*, Vulnerable; non-viable population in absence of fire) and no others are likely. No threatened fauna is likely to use the site, with the exception of the Cape Dwarf Chameleon (*Bradypodion pumilum*), which is listed as Vulnerable, and may occur on site.

Most of the site is mapped as ONA (Other Natural Area), which is not a high level of planning category in the CapeNature SBP.

Direct loss of animals will also occur during the clearing and early development stage. Animals most impacted will be those that are slow or reluctant to move, including Breviceps frogs (if present), Angulate Tortoise, dune snails (*Trigonephru*s) and the fossorial animals (including invertebrates).

The overall ecological significance of this direct vegetation and faunal habitat loss on site is Medium negative before mitigation. No clear mitigation seems possible in this case other than faunal Search and Rescue, Search and Rescue for some of the bulbs on site (Haemanthus, Chasmanthe), and avoidance of most of the larger milkwoods (Sideroxylon inerme) and as many as possible of the other mapped trees shown in Figure 1b of the terrestrial biodiversity assessment report. It is likely that about 65% of the mapped trees may survive the initial road and service development of the site. If this is done the direct impacts could be very slightly reduced, but would still best be assessed as Medium negative impact.

Operational Phase Ecological Impacts

Operational phase impacts will take effect as soon as any of the natural vegetation and faunal habitat on the site is lost or disturbed, and will persist in perpetuity, or as long as those areas are not rehabilitated. The main operational phase impact would be loss of current moderate levels of ecological connectivity across the site (essentially only W-E connectivity now available), and associated habitat fragmentation. This will affect both fauna and flora.

The site is not part of an identified key ecological linkage between the Hoek van de Berg NR to the west and the Vermont Salt Pan to the east.

The following mitigation for the proposed development is deemed feasible, reasonable and mandatory:

- All milkwoods (*Sideroxylon inerme*) above 1m and many of the other indigenous trees on site taller than 1m have been surveyed and shown in Figure 1b. It is understood that some (maybe 35%) of these will be lost to road and bulk service development, but the others should remain and survive within designated

erven, although another 50% may be lost during house development. The applicant must obtain the relevant permits if any milkwoods (a Protected Species) are to be damaged or lost during the site development process, and subsequently by new erf owners if during the construction phase.

- Search and Rescue must be undertaken for all reptiles and any other fauna, notably tortoises and chameleons, during the site preparation, and especially when any earthworks and trenches are being dug or left open. This should be undertaken by an appointed ECO on a daily basis, until the site has been cleared (apart from the milkwoods and other designated trees) and the services are installed. Rescued animals should be released inside the adjacent Hoek van der Berg Nature Reserve (with relevant permission).
- Search and Rescue for all translocatable geophytes should be undertaken prior to site development. Suitable candidates include about 500 *Chasmanthe aethiopica* (cobraflower) bulbs, and about ten *Haemanthus coccineus* (poeierkwas). These should be translocated to similar habitat in the adjacent Hoek van de Berg NR, after permission has been obtained to do so, and should be undertaken by someone with experience in plant translocations.

Conclusions and Recommendations

- The study area supports partly degraded vegetation that is best classified as Overberg Dune Strandveld, which is gazetted as an Endangered vegetation type. The site has been degraded by a long history of woody alien invasives, which do not appear to have been managed in any significant way.
- Overall botanical and faunal sensitivity is deemed to be Medium, and it is mostly mapped as relatively low-level ONA (Other Natural Area) in the CapeNature SBP.
- One plant SoCC was recorded on site during the survey (*Diosma subulata*; Vulnerable, 5 plants, non-viable population in the long-term absence of fire).
- The Cape Dwarf Chameleon (*Bradypodion pumilum*) is listed as Vulnerable, and may occur on site, as it has been recorded nearby. This is likely the only faunal SoCC on site.
- Translocation of mature trees on site is not likely to be successful, and hence cannot be used as mitigation.
- The development of the site is likely to have an acceptable Medium negative faunal and botanical impact at a regional scale (before and after mitigation). This level of impact is appropriate for the consideration of a biodiversity offset (Department of Forestry, Fisheries & the Environment. 2023) and the investigation of a possible offset for the development of this site is thus recommended but is beyond the scope of this report. Biodiversity offsets are designed to help minimise the unavoidable negative ecological impacts of development, after all possible mitigation, where the ecological impact is greater than Low negative and less than High negative (which is typically a No Go scenario for development)
- All the relatively minor mitigation outlined in Section 8 must be properly implemented.

Given the location and the scope of the project, the development is in line with the existing and is within the built-up area of urban area of Vermont.

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

The Environmental Management Plan (EMPr) incorporates a comprehensive set of impact management measures identified by specialists to address various aspects associated with the proposed development. These measures aim to mitigate negative impacts and promote sustainable practices. Here is an overview of the impact management measures included in the EMPr:

Ecological and Botanical Impacts

- All milkwoods (Sideroxylon inerme) above 1m and many of the other indigenous trees on site taller than 1m have been surveyed and shown in Figure 1b of the terrestrial biodiversity assessment. It is understood that some (maybe 35%) of these will be lost to road and bulk service development, but the others should remain and survive within designated erven, although another 50% may be lost during house development. The applicant must obtain the relevant permits if any milkwoods (a Protected Species) are to be damaged or lost during the site development process, and subsequently by new erf owners if during the construction phase.
- Search and Rescue must be undertaken for all reptiles and any other fauna, notably tortoises and chameleons, during the site preparation, and especially when any earthworks and trenches are being dug or left open. This should be undertaken by an appointed ECO on a daily basis, until the site has been cleared (apart from the milkwoods and other designated trees) and the services are installed. Rescued animals should be released inside the adjacent Hoek van der Berg Nature Reserve (with relevant permission).
- Search and Rescue for all translocatable geophytes should be undertaken prior to site development. Suitable candidates include about 500 *Chasmanthe aethiopica* (cobraflower) bulbs, and about ten *Haemanthus coccineus* (poeierkwas). These should be translocated to similar habitat in the adjacent Hoek van de Berg NR, after permission has been obtained to do so and should be undertaken by someone with experience in plant translocations.

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

N/A

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

The proposed development is expected to have several positive impacts on the surrounding communities:

- The creation of housing units will address the housing needs within the community, potentially reducing housing shortages and improving overall living conditions.

- The development is likely to generate new job opportunities, both directly and indirectly. Construction activities, maintenance, and services related to the development will contribute to employment within the local community.

- The presence of the development can stimulate economic growth within the community. Local businesses, including retail and services, may experience increased demand, leading to potential expansion and economic benefits.

- The proposed development has the potential to enhance local infrastructure, including roads, utilities, and public services. These improvements are anticipated to bring benefits not only to the new residents but also to the existing community. Additionally, the introduction of a new road connecting to the existing infrastructure is expected to alleviate traffic congestion in the area.

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

N/A

6.	Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.

None that the EAP is aware of.

7.	Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.

Extract from Terrestrial Impact Assessment Report attached as **Appendix G1**

- The study area supports partly degraded vegetation that is best classified as Overberg Dune Strandveld, which is gazetted as an Endangered vegetation type. The site has been degraded by a long history of woody alien invasives, which do not appear to have been managed in any significant way.
- Overall botanical and faunal sensitivity is deemed to be Medium, and it is mostly mapped as relatively low-level ONA (Other Natural Area) in the CapeNature SBP.
- One plant SoCC was recorded on site during the survey (*Diosma subulata*; Vulnerable, 5 plants, non-viable population in the long-term absence of fire).
- The Cape Dwarf Chameleon (*Bradypodion pumilum*) is listed as Vulnerable, and may occur on site, as it has been recorded nearby. This is likely the only faunal SoCC on site.
- Translocation of mature trees on site is not likely to be successful, and hence cannot be used as mitigation.
- The development of the site is likely to have an acceptable Low to Medium negative faunal and botanical impact at a regional scale (before and after mitigation).
- All the relatively minor mitigation outlined in Section 8 must be properly implemented.
- Given that relatively little mitigation is possible and that quite substantial biodiversity will still be lost (even if not of High or Medium negative significance) it is recommended that the applicant make a sizeable conservation contribution (donation) to a local conservation group (Vermont – Hermanus area) that is involved with alien invasive vegetation management and control, as this is a major threat to the remaining habitat in the region.

8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.

According to the Environmental Impact Assessment and Management Strategy for South Africa (2014), Impact Mitigation Hierarchy is a tool used throughout a project lifecycle to limit negative environmental impacts. The first tier considers how to avoid the impact entirely and is considered early in the project to allow for alternatives to be considered.

The impacts that cannot be avoided, should be minimised. Effective minimisation can eliminate some impacts and reduce others, allowing sustainability targets to be met. Where the targets cannot be met, the application should be declined. The next consideration is restoration, where minimisation efforts have failed to reach the required target.

Figure 8: Mitigation Hierarchy (HOLCIM.COM 2024)

The first aspect on this development is to include the specialist input into the report. The screening of the development site indicated the presence of ESA1 on the site. The site was visited on 20 January 2024, and again on 8 April (for a tree survey). The initial and primary site visit was well outside the optimal winter – spring flowering season in this mainly winter rainfall area, and thus the few potential geophytes and annuals likely to be present were neither evident nor identifiable, whilst all perennial plants were identifiable. Some species (geophytes) were added to the observed list after the April site visit, after some rain had fallen. There were thus some minor seasonal constraints on the accuracy of the botanical findings but given the heavy dominance of perennials in this area – which in a Fynbos system can usually be used as indicators of habitat sensitivity - the confidence in the accuracy of the botanical findings is high. The author has undertaken extensive work within the region, which facilitates the making of local and regional comparisons and inferences of habitat quality and conservation value.

The study area was walked, and all plants on site were noted. Photographs of some of the key species were made using a Fuji mirrorless slr camera, and have been uploaded to the biodiversity website iNaturalist.org. Satellite imagery dated Dec 2022 (and earlier) was used to inform this assessment, and for mapping. It is assumed that any development would result in the permanent loss of all natural or partly natural vegetation in that area. Tree positions were mapped using the app Fields Area Measure, directly via smartphone, and then downloaded as kmz files for use in Google Earth. Faunal observations were incidental during the site visit, and no formal trapping or surveying of any sort was undertaken, and thus most of the more cryptic faunal species present are likely to have been missed. Nearby faunal observations on iNaturalist.org were used to inform the faunal survey.

The botanical sensitivity of a site is a product of plant species diversity, plant community composition, rarity of habitat, degree of habitat degradation, rarity of species, ecological viability and connectivity, restorability of habitat, vulnerability to impacts, and reversibility of threats.

Indigenous plant diversity on site is moderate low, being less than 50% of what would be expected in a pristine example of this habitat. The following indigenous plant species were observed: *Passerina corymbosa, Cissampelos capensis, Olea exasperata, Sideroxylon inerme, Harpephyllum caffrum, Oftia africana, Pterocelastrus tricuspidatus, Euclea racemosa, Myrsine africana, Thamnochortus insignis, Hellmuthia membranacea, Muraltia satureoides, Knowltonia vesicatoria, Otholobium bracteolatum, Ehrharta villosa, E. calycina, Diosma sabulosa, Hermannia rudis, Phylica ericoides, Senecio halimifolius, Zantedeschia aethiopica, Stenotaphrum secundatum, Seriphium plumosum, Pelargonium capitatum, Searsia lucida, Colpoon compressum, Cassine peragua, Mesembryanthemum canaliculatum, M. aitonis, Trachyandra divaricata, Metalasia muricata, Osteospermum moniliferum, Carpobrotus edulis and Athanasia trifurcata.*

A single plant Species of Conservation Concern (SoCC) was recorded during the survey, and no others are likely to persist here. About five plants of the buchu Diosma subulata (Vulnerable) were found deep within a

rooikrans thicket in the centre of the site. These reseeding plants require fire for regeneration, and in the absence of fire on site for at least 20 years are unlikely to survive much longer, even if the site is not developed. The presence of these five plants is significant, as the species is now rare in the Hermanus area, but as noted, they are unlikely to survive on this site, even were it not to be developed, and they will not survive translocation or replanting either.

No frogs are likely on site, due to the absence of wetlands, although Breviceps montanus could in theory be present, as it does not require water or wetlands.

Bradypodion pumilum (Cape Dwarf Chameleon) has been regularly recorded from similar nearby habitat (iNaturalist.org) and is likely to be present on site. This species is Redlisted as Vulnerable (Bates et al 2014). No other Redlisted reptiles are likely to be present. The Southern Adder (Bitis armata; Vulnerable) has been flagged by the Screening Tool for the region, but is unlikely in this habitat. An Angulate Tortoise (Chersina angulata) was observed on site.

No bird SoCC are likely on site, and a typical selection of Dune Strandveld species was recorded, including Speckled Mousebird, Karoo Prinia, Southern Doublecollared Sunbird, Cape Bulbul, Cape Whiteye, Fiscal Flycatcher, Cape Spurfowl, Cape Robinchat and Boubou.

Mammals present or using the site (tracks and scat found, or live animals seen) include porcupine (Hystrix africaeaustralis), Striped Fieldmouse (Rhabdomys pumilio) and Cape Grey Mongoose (Herpestes pulverulentus), and other likely species include Large Grey Mongoose (Herpestes ichneumon), Caracal (Caracal caracal), and Cape Genet (Genetta tigrina). Some of these may occasionally be resident, but most probably reside mainly in the much larger adjacent Hoek van de Berg Nature Reserve.

No threatened butterflies are likely to utilise the site, although this cannot be ruled out without a survey (Mecenero et al 2013). Indigenous dune snails (Trigonephrus) were also observed on site (possibly T. ambiguosus).

The entire site is deemed to be of Medium faunal sensitivity, and no map is provided as it adds little value.

The study area supports partly degraded vegetation that is best classified as Overberg Dune Strandveld, which is gazetted as an Endangered vegetation type. The site has been degraded by a long history of woody alien invasives, which do not appear to have been managed in any significant way.

Overall botanical and faunal sensitivity is deemed to be Medium, and it is mostly mapped as relatively low-level ONA (Other Natural Area) in the CapeNature SBP.

One plant SoCC was recorded on site during the survey (*Diosma subulata*; Vulnerable, 5 plants, non-viable population in the long-term absence of fire).

The Cape Dwarf Chameleon (*Bradypodion pumilum*) is listed as Vulnerable, and may occur on site, as it has been recorded nearby. This is likely the only faunal SoCC on site.

Translocation of mature trees on site is not likely to be successful, and hence cannot be used as mitigation.

The development of the site is likely to have an acceptable Low to Medium negative faunal and botanical impact at a regional scale (before and after mitigation).

All the relatively minor mitigation outlined in Section 8 must be properly implemented.

Given that relatively little mitigation is possible and that quite substantial biodiversity will still be lost (even if not of High or Medium negative significance) it is recommended that the applicant make a sizeable conservation contribution (donation) to a local conservation group (Vermont – Hermanus area) that is involved with alien invasive vegetation management and control, as this is a major threat to the remaining habitat in the region.

Preferred layout alternative 2 had evolved in line with the specialist overlay on the milkwood trees. Given the proposed development and location within the existing suburb of Vermont there are not many layout alternative available for the proposed development. Alternative 2 is the preferred alternative and has been assessed by the botanist and takes into consideration the location of sensitive vegetation such as milkwood trees.

SECTION J: GENERAL

1. Environmental Impact Statement

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

- The development site is located in an existing urban area in Vermont, Hermanus, with a total footprint of 21,578 square meters. The development's footprint encompasses various zones, including single residential erven, town housing erven, public open space erven, and road and parking erven.

- A small portion of the Ecological Support Area (ESA) falls within the development site.

- The proposed development involves the clearance of natural vegetation, including terrestrial ESA. This could result in the loss of biodiversity, particularly impacting the indigenous vegetation present at the site.

- The transition from thick vegetation to urban infrastructure raises concerns about vegetation loss and potential land degradation during the construction phase of the proposed development in which in this case, the vegetation is affected by the invasive alien plants.

- The proposed development is within an existing municipality spatial development framework and requires consideration of water supply and wastewater treatment infrastructure capacity. Based on the Overstrand Municipality Spatial development framework, there is sufficient capacity in the existing water reticulation system to accommodate the proposed development and no network upgrades will be required. In addition to this, there is sufficient capacity in the existing sewer reticulation system downstream to accommodate the
  proposed development, except for a small section of a 110 mm diameter outfall sewer in Malmok Crescent that has to be upgraded to a 200 mm diameter outfall sewer.

- The need for the development is justified based on the demand for single residential housing in the area. The desirability is aligned with zoning regulations and the existing urban context.

- The development has the potential to cause pollution and degradation, primarily through vegetation clearance. Mitigation measures are explored to minimize and remedy these impacts.

- The development is expected to generate waste during the construction phase. Measures to avoid, minimize, and safely treat or dispose of waste are considered.

- The site is not identified as having cultural or historical significance. However, a heritage resources study is being conducted to ensure compliance with relevant regulations.
- The development is also expected to contribute to economic growth, job creation, and housing needs. It aligns with the socio-economic objectives of the area and local economic development initiatives.

- Potential impacts on public health and well-being, such as noise, dust, and visual changes, are considered as the general impacts to the associated development. Mitigation measures are explored to address these concerns.

The following mitigation for the proposed development is deemed feasible, reasonable and mandatory:

- All milkwoods (*Sideroxylon inerme*) on site taller than 1m should be surveyed prior to any site development and then clearly demarcated and avoided by at least 3m (measured from stem) during any site development. The applicant must obtain the relevant permits if any milkwoods are to be damaged or lost during the site development process, and subsequently by new erf owners if during the construction phase.
- Search and Rescue must be undertaken for all reptiles and any other fauna, notably tortoises and chameleons, during the site preparation, and especially when any earthworks and trenches are being dug or left open. This should be undertaken by an appointed ECO on a daily basis, until the site has been cleared (apart from the milkwoods) and the services are installed. Rescued animals should be released inside the adjacent Hoek van der Berg Nature Reserve (with relevant permission).
- Search and Rescue for all translocatable geophytes should be undertaken prior to site development. Suitable candidates include about 500 Chasmanthe aethiopica (cobraflower) bulbs, and about ten Haemanthus coccineus (poeierkwas). These should be translocated to similar habitat in the adjacent Hoek van de Berg NR, after permission has been obtained to do so, and should be undertaken by someone with experience in plant translocations.
-

Conclusions and Recommendations by the Botanical specialist:

- The study area supports partly degraded vegetation that is best classified as Overberg Dune Strandveld, which is gazetted as an Endangered vegetation type. The site has been degraded by a long history of woody alien invasives, which do not appear to have been managed in any significant way.
- Overall botanical and faunal sensitivity is deemed to be Medium, and it is mostly mapped as relatively low-level ONA (Other Natural Area) in the CapeNature SBP.
- One plant SoCC was recorded on site during the survey (Diosma subulata; Vulnerable, 5 plants, non-viable population in the long-term absence of fire).
- The Cape Dwarf Chameleon (Bradypodion pumilum) is listed as Vulnerable, and may occur on site, as it has been recorded nearby. This is likely the only faunal SoCC on site.
- Translocation of mature trees on site is not likely to be successful, and hence cannot be used as mitigation.
- The development of the site is likely to have an acceptable Low to Medium negative faunal and botanical impact at a regional scale (before and after mitigation).
- All the relatively minor mitigation outlined in Section 8 (of the Botanical report) must be properly implemented.
- Given that relatively little mitigation is possible and that quite substantial biodiversity will still be lost (even if not of High or Medium negative significance) it is recommended that the applicant make a sizeable conservation contribution (donation) to a local conservation group (Vermont – Hermanus area) that is involved with alien invasive vegetation management and control, as this is a major threat to the remaining habitat in the region.

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

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

	PHASE	IMPACT	RISK	Significance
ALTERNATIVE 1	Construction	Vegetation removal	Loss of approximately 1400 m^2 of Ecological Support Area. Loss of habitat for fauna and flora Risk of alien vegetation spreading.	Medium negative
		Noise	Noise generated from the vehicles and machinery during the construction phase. Noise disturbance to transient receptors.	Low Negative
		Visual impacts	Typical visual impacts associated with a construction site.	Low negative
		Dust	Dust and sand blowing may impact the road users and the adjacent residential areas close to the site	Very-Low Negative
		Socio-economic	Job creation Impact of large construction vehicles accessing the site.	High Positive
	Operational	Socioeconomic	The development will generate a significant amount of job creation.	High Positive
		Ecological	Loss of ecological connectivity and species movement across and off site, loss of ability for natural fires.	Medium negative
		Botanical	Investments on properties Tourists attractions	Medium Negative
	Decomm.& Closure	N/A	N/A	
ALTERNATIVE 2 (PREFERRED)	Construction	Socio-economic	Job creation during the development/construction phase of the Erven	High Positive
		Noise	Noise disturbance to transient receptors.	Low negative

		Dust	Dust generated from the site clearing and site preparation.	Very-Low negative (-)
		Visual	Short-term visual impacts associated with construction. Local, short-term	Low negative
		Vegetation removal	Removal of vegetation on the site is identified as medium. Critically endangered and endangered species of vegetation are found	Medium -
	Operational	Socioeconomic	Job creation, skills transfer and investment opportunities.	High Positive
		Ecological	Risk of alien vegetation due to landscaping and poor Management Loss of natural spaces, corridors and vegetation	Medium -
		Botanical	Loss of medium sensitive vegetation areas	Medium Negative
	Decomm.& Closure	N/A	N/A	
NO-GO AREA	Construction	Socioeconomic	No scope for job creation, skill transfer and investments	High negative
	Operational	Socioeconomic	No scope for job creation, skill transfer and investments	High Negative
		Ecological	Risk of alien vegetation due to landscaping and poor Management.	High positive
	Decomm.& Closure	N/A	N/A	

- **Alternative 1 & 2(preferred)**: This alternative will have high positive impacts on job creation and socio-economic factors, but also medium negative impacts on vegetation, ecological, and botanical aspects. It will also cause low negative impacts on noise, dust and visual.
- **No-go area**: This alternative involves no development and will have high negative impacts on socio-economic factors, but high positive impacts on ecological factors.

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

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

Mitigation to manage the potential negative impacts are included in the Draft EMPr, but the summary is listed as follows

Terrestrial Impact Assessment:

- All milkwoods (Sideroxylon inerme) above 1m and many of the other indigenous trees on site taller than 1m have been surveyed and shown in Figure 1b. It is understood that some (maybe 35%) of these will be lost to road and bulk service development, but the others should remain and survive within designated erven, although another 50% may be lost during house development. The applicant must obtain the relevant permits if any milkwoods (a Protected Species) are to be damaged or lost during the site development process, and subsequently by new erf owners if during the construction phase.
- Search and Rescue must be undertaken for all reptiles and any other fauna, notably tortoises and chameleons, during the site preparation, and especially when any earthworks and trenches are being dug or left open. This should be undertaken by an appointed ECO on a daily basis, until the site has been cleared (apart from the milkwoods and other designated trees) and the services are installed. Rescued animals should be released inside the adjacent Hoek van der Berg Nature Reserve (with relevant permission).
- Search and Rescue for all translocatable geophytes should be undertaken prior to site development. Suitable candidates include about 500 *Chasmanthe aethiopica* (cobraflower) bulbs, and about ten *Haemanthus coccineus* (poeierkwas). These should be translocated to similar habitat in the adjacent Hoek van de Berg NR, after permission has been obtained to do so, and should be undertaken by someone with experience in plant translocations.

Generic mitigation:

- An Environmental Control Officer (ECO) is to be appointed during the construction phase of the proposed development
- Measures to reduce, reuse and recycle are to be strictly administered.
- All construction workers are to wear appropriate personal protective equipment (PPE).
- Construction is not to be a source of contamination and therefore measures such as spills kits, drip trays etc are to be on site throughout the construction period.
- Dust suppression is to be administered during construction to prevent air pollution.
- An environmental consultant must be called in to verify any contamination should there be an indication or complaint of a loss of fauna and flora.
- Stock reconciliation should take place.
- Spill kit or similar clean up kit should be on site in the event of any leak or spill.
- Adequate training for all employees for all matters, including spills, emergency response procedures and environmental awareness.
- Should any heritage resources, including evidence of graves and human burials, archaeological material and Palaeontological material be discovered during the execution of the activities above, all works must be stopped immediately and HWC must be notified without delay.

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

N/A

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

It should be noted that this erven remains the last open space for development for the area of Vermont. Given the growth of population expected to increase in the next coming years, as depicted in the Municipal SDF there is a dire need for housing in the area. Based on the comprehensive environmental assessment and findings, it is recommended that the proposed activity or development be authorized with specific conditions to mitigate potential negative impacts. The following factors support this recommendation:

Extract from the Terrestrial Impact Assessment Report:

- The study area supports partly degraded vegetation that is best classified as Overberg Dune Strandveld, which is gazetted as an Endangered vegetation type. The site has been degraded by a long history of woody alien invasives, which do not appear to have been managed in any significant way.
- Overall botanical and faunal sensitivity is deemed to be Medium, and it is mostly mapped as relatively low-level ONA (Other Natural Area) in the CapeNature SBP.
- One plant SoCC was recorded on site during the survey (*Diosma subulata*; Vulnerable, 5 plants, non-viable population in the long-term absence of fire).
- The Cape Dwarf Chameleon (*Bradypodion pumilum*) is listed as Vulnerable, and may occur on site, as it has been recorded nearby. This is likely the only faunal SoCC on site.
- Translocation of mature trees on site is not likely to be successful, and hence cannot be used as mitigation.
- The development of the site is likely to have an acceptable Medium negative faunal and botanical impact at a regional scale (before and after mitigation). This level of impact is appropriate for the consideration of a biodiversity offset (Department of Forestry, Fisheries & the Environment. 2023) and the investigation of a possible offset for the development of this site is thus recommended but is beyond the scope of this report. Biodiversity offsets are designed to help minimise the unavoidable negative ecological impacts of development, after all possible mitigation, where the ecological impact is greater than Low negative and less than High negative (which is typically a No-Go scenario for development).
- All the relatively minor mitigation outlined in Section 8 must be properly implemented.

2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.
	N/A
2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.
Five years should be the EA period. While no further information can be provided at the time of the Draft BAR, the applicant would aim to commence with construction as soon as possible once the EA is granted.	

3. Water

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.
The proposed development of the subject property will also connect to the water networks provided by the Overstrand Municipality. Water will be reused and recycled where possible.

4. Waste

Explain what measures have been taken to reduce, reuse or recycle waste.
Waste is collected weekly by the municipality and it is recycled on the dumping site.

5. Energy Efficiency

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

Alternative energy:

- Installation of gas geysers for hot water heating is encouraged.
- Solar geysers are permitted with a max of 2 panels per erf.
- The solar panels for hot water heating must be indicated on the drawings.
- The water reservoir may not be mounted on the roof surface and must be concealed within the roof space
- The position and extent of any solar panels for alternative energy supply must be indicated on the drawing and approved by the HOA and were deemed necessary by any adjoining effected property owner.
- Distinctions must be made between solar panels for hot water supply and alternative energy supply.

SECTION K: DECLARATIONS

DECLARATION OF THE APPLICANT

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

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

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;

- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;

- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;

- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;

- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
  - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - Legitimate costs in respect of specialist(s) reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;

- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

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

Signature of the Applicant: Date:

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I **MICHELLE NAYLOR** EAPASA Registration number **2019/698** as the appointed EAP hereby declare/affirm the correctness of the:

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

mnaylor

05-07-2024

Signature of the EAP: Date:

LORNAY ENVIRONMENTAL CONSULTING

Name of company (if applicable):

DECLARATION OF THE REVIEW EAP

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

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

Signature of the EAP: Date:

Name of company (if applicable):

DECLARATION OF THE SPECIALIST

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

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

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

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

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

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

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

Signature of the EAP: Date:

Name of company (if applicable):

DECLARATION OF THE REVIEW SPECIALIST

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

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

Signature of the EAP: Date:

Name of company (if applicable):