LORNAY
ENVIRONMENTAL CONSULTING

In-process
Basic Assessment Report

Proposed Mixed Use Development on Erf 878 Riebeek Kasteel
Malmesbury RD

12 March 2025

Western Cape Government

Department of Environmental Affairs and Development Planning

BASIC ASSESSMENT REPORT

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

APRIL 2024

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APRIL 2024

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

GENERAL PROJECT DESCRIPTION

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

The rezoning and subdivision of Erf 878, Riebeek Kasteel, is proposed, in order to establish a mixed-use development. The erf is currently zoned Agriculture Zone 1 and has been actively farmed previously but has not been farmed during the preceding 10 years, except for adhoc grazing of springbok.

Please note that this In-Process Basic Assessment Report forms the continuation of the NEMA Application process and has been take over as of January 2025, by Lornay Environmental Consulting – Michelle Naylor. Enviro Africa (Charel Bruwer) is no longer involved in the application process or project. All previous rounds of public participation, comments received and the register for Interested and Affected Parties are included in the In-Process phase of the Environmental Authorisation process. In addition, the way forward is as per agreement with the Department of Environmental Affairs and Development Planning (DEA&DP).

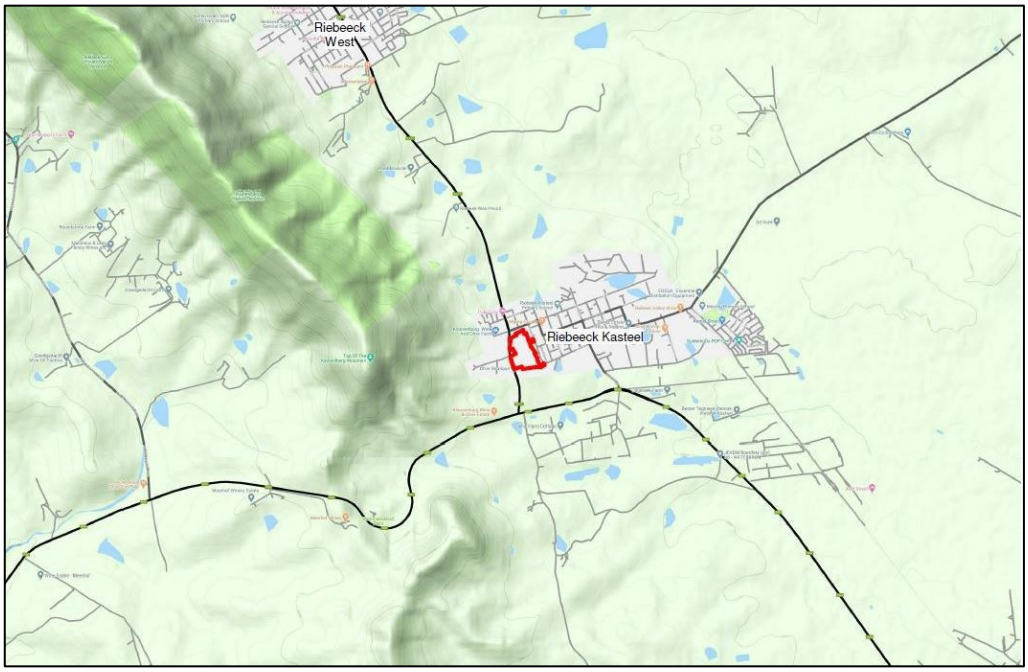
This report forms part of the In-Process Basic Assessment Report and presents previous Alternatives which were distributed to I&APS in the previous three rounds of public participation. It also contains a revised layout alternative which sees the complete removal of the filling / service station, wedding venue and allows for a less dense development with guidance from various additional specialists.

Alternative 3 is now considered the preferred alternative and has been information by the following specialists as outlined herein:

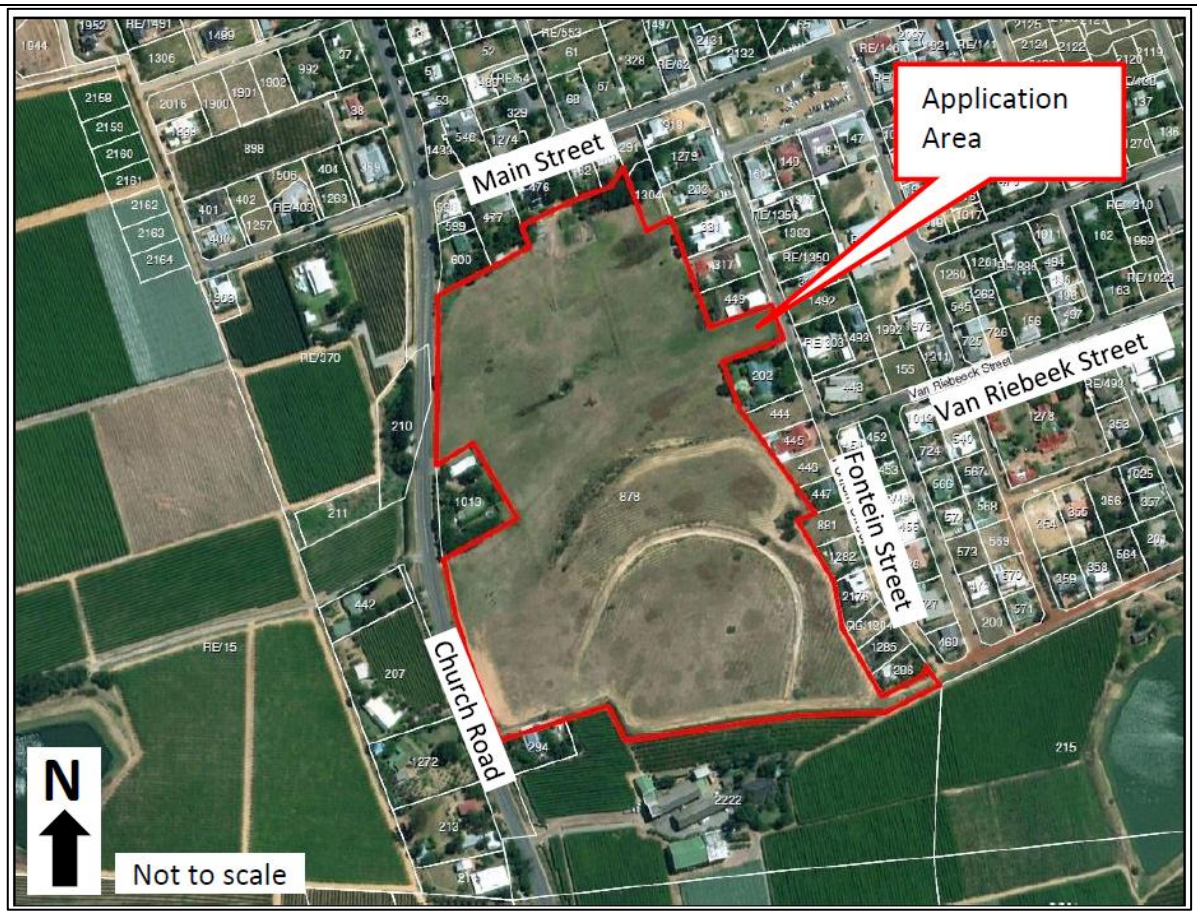
- → Botanical
- → Geotechnical
- → Heritage
- → Archaeological

- → Visual – revised
- → Urban Design
- → Landscape Architect
- → Traffic Impact
- → Agricultural Compliance Statement
- → Freshwater Impact Assessment
- → Services and demand

The subject property is located within the urban area of Riebeek Kasteel:



Within the local context of Riebeek Kasteel, the site is considered “ideally” placed, as follows:

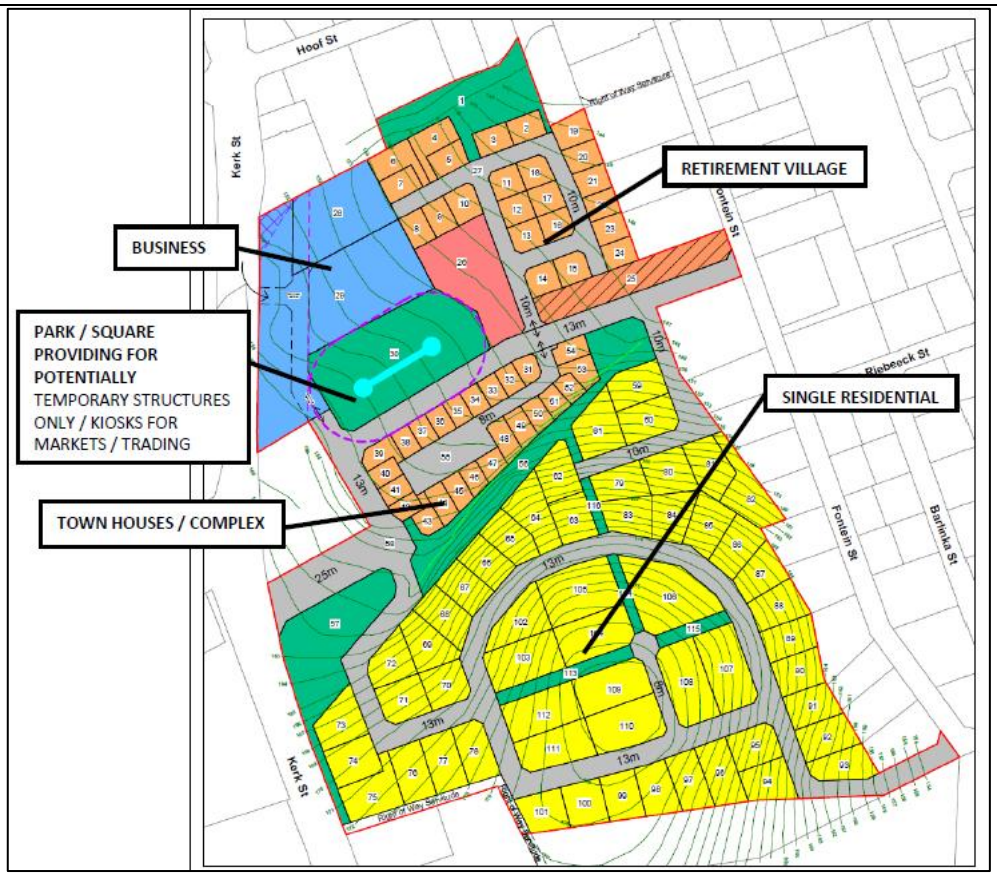


The application area forms part of an area identified for business and residential purposes in terms of the approved Swartland Spatial Development Framework, 2023 – 2027.

In 1985 a subdivision application was submitted for the application area which was approved by the previous Cape Provincial Administration but lapsed as the rights were never established.

In 1995 the application area which is approximately 110977m^2 in extent was established after the subdivision of the original Erf 878 into 5 portions and a Remainder, all gaining access from the 13 m wide Fontein Street. The 5 single residential erven along Fontein Street were sold and developed, while the portion on the southern side was consolidated with the last lying portion to create the application area discussed herein.

The proposal includes the development of a residential township including single residential erven, a retirement village, a townhouse complex, two business erven for the establishment of a boutique shopping centre, private open space and internal roads.



Development Proposal Typologies (Extracted from Interactive Town and Regional Planning LUPA Report).

Application is therefore made for the following:

1. **Rezoning** in terms of Chapter IV, Section 25.2(a) of the Swartland Municipal Land Use Planning By-Law, 2020 from Agricultural Zone 1 to Subdivisional Area for residential use, a retirement village, parks, private open space, retail as well as roads.

2. **Subdivision** in terms of Chapter IV, Section 25.2(d) of the Swartland Municipal Land Use Planning By-Law, 2020 of the subdivisional area which is approximately 11 0977m² into 116 portions and simultaneous **rezoning** of the subdivided portions in terms of Chapter IV, Section 25.2(a) of the Swartland Municipal Land Use Planning By-Law, 2020, from Agricultural Zone 1 to mixed use.

Public Participation Process to Date

Lornay Environmental Consulting was appointed in January 2025 to complete the NEMA application process. Up to this, a previous Environmental Assessment Practitioner (EAP), Charel Bruwer of Enviro Africa, completed the out of process / pre-application Basic Assessment process and associated public participation.

Lornay Environmental Consulting will be responsible for the completion of the In-process Basic Assessment process and associated public participation, as well as the submission of the final Basic Assessment Report to the Competent Authority, for decision making purposes.

Three rounds of pre-application public participation were conducted by Charel Bruwer of Enviro Africa. Please note that the information below relating to the three rounds of out of process public participation, was supplied by the previous EAP. The three round were conducted at the following times:

a. 2020 Public participation: 25 March 2020 to 26 May 2020 (60 days)
b. 2021 Public participation: 16 March 2021 to 22 April 2021 (30 days)

c. 2024 Public participation: 15 March 2024 to 16 April 2024 (30 days)

It is important to note that all identified interested and affected parties as well as all applicable Organs of State, who participated under the previous rounds of public participation will remain as registered Interested and Affected Parties. It is also important to note that comments and concerns raised during the out of process public participation are noted and have formed the critical input for the evolution of alternatives and the creation of the Preferred Alternative 3.

All registered I&APs and Organs of State will be notified of this first round of in-process public participation. Notice boards have been placed at various areas on the site. All comments received and / or requests to be registered as a I&AP in the process will be captured as per previous rounds and in line with the NEMA EIA Regulations, 2014, as amended.

Specialist input

The following specialists provided guidance on the proposal and evolution of the layout of the alternatives:

Field	Company / Person	Appendix
Botanical / Terrestrial Impact Assessment	P.JJ Botes of PB Consult	G1
Geotechnical Assessment		G2
Heritage Impact Assessment	Bridget O'Donoghue	G3
Archaeological Impact Assessment	Jonathan Kaplan	G5
Visual Impact Assessment	Bruce Eitzen	G11
Urban Design Report	Etienne Britz	G4
Architectural Design Report		G5
Traffic Impact Assessment	DECA Consulting	G6
Agricultural Compliance Statement	Soil ZA	G7
Freshwater Impact Assessment	Delta Ecology Kim van Zyl	G8
Landscape Plan	Johan de Villiers Landscape Studio	G9

Alternatives

Three layout alternatives have been assessed in the process to date, being Alternative 1, Alternative 2 and Alternative 3 – preferred. These layouts have evolved in line with specialist and I&AP comments.

The original Alternative 1 (Former A1) had a wedding venue with small steeple church located on the top of the small hill / highest point on the site. The idea was to make this a visual focal point of the development and create a sense of place by planting cypress trees to soften, screen and add a church-like character to the proposed wedding venue. This alternative also contained a fuel service station on the northwest section of the site.

However, comments received from Interested and Affected Parties (I&APs), found this to be out of character with the present ambiance of Riebeek Kasteel. Both the heritage investigation and visual impact assessment stressed that the proposed wedding venue on top of the properties high point would be in competition with and detract from the existing visual and heritage character of the old church tower that was a heritage and visual focal point in the existing townscape of Riebeek Kasteel.

Taking the abovementioned comments into consideration, the original layout was amended as follows. The proposed wedding venue on top of the hill was removed and replaced by single residential housing. The sight line from Kerkstraat across a portion of Erf 878 to the old church as focal point was cleared up so that the visual character of the church was maintained. In addition, an urban and architectural design protocol was also drawn up, taking the historical sense of place and character of Riebeek Kasteel into consideration (see Urban and Architectural Design in **Appendix G**).

Alternatives 1 and 2 then went through further reiterations based on heritage concerns, with Alternative 2 seeing the complete removal of the wedding venue on the hilltop and a redesign of the service station. However further

comments during public participation resulted in the complete removal of the service station due to need and desirability concerns, and the reduction of the density of the development, particularly on the hill, in order to maintain the open space, feel of the hilltop.

The current preferred alternative is Alternative 3.

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

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

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

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

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

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

   DEADPEIAAdmin@westerncape.gov.za
   Directorate: Development Management (Region 1):
   City of Cape Town; West Coast District Municipal area;
   Cape Winelands District Municipal area and Overberg District Municipal area.
   DEADPEIAAdmin.George@westerncape.gov.za
   Directorate: Development Management (Region 3):
   Garden Route District Municipal area and Central Karoo District Municipal area

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MAPS

Provide a location map (see below) as **Appendix A1** to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as **Appendix B1** to this BAR; and if applicable, all alternative properties and locations.	
Site Plan:	Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following: • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. • The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. • The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development **must** be clearly indicated on the site plan. • Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. • Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): o Watercourses / Rivers / Wetlands o Flood lines (*i.e.,* 1:100 year, 1:50 year and 1:10 year where applicable); o Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): o Ridges; o Cultural and historical features/landscapes; o Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as **Appendix C**. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as **Appendix D**.

Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as **Appendix A3**.

ACRONYMS

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

ATTACHMENTS

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

The following checklist of attachments must be completed.

APPENDIX			**✓ (Tick) or x (cross)**
Appendix A:	**Maps**		
	Appendix A1:	**Locality Map**	✓
	Appendix A2:	**Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning**	N/A
	Appendix A3:	**Map with the GPS co-ordinates for linear activities**	N/A
Appendix B:	**Appendix B1:**	**Site development plan(s)** • **Alternative 1** • **Alternative 2** • **Alternative 3 – Preferred**	✓
	Appendix B2	**A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;**	✓
Appendix C:	**Photographs**		✓
Appendix D:	**Biodiversity overlay map**		✓

Appendix E:	**Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.**		
	Appendix E1:	**Final comment/ROD from HWC**	✓
	Appendix E2:	**Copy of comment from Cape Nature**	✓
	Appendix E	**Final Comment from the DWS**	Pending
	Appendix E	**Comment from the DEA: Oceans and Coast**	N/A
	Appendix E	**Comment from the DAFF**	N/A
	Appendix E	**Comment from WCG: Transport and Public Works**	N/A
	Appendix E3:	**Comment from WCG: DoA**	Attached – no objection
	Appendix E4:	**Comment from the local authority**	Attached letter of support
	Appendix E4:	**Confirmation of all services (water, electricity, sewage, solid waste management)**	As above
	Appendix E:	**Comment from the District Municipality**	Pending
Appendix F:	**Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.**		✓
Appendix G:	**Specialist Report(s)** **APP G1: Botanical and Biodiversity Report** **APP G2: Report on Geotechnical Conditions for Services** **APP G3: Heritage Impact Assessment** **APP G4: Urban Design Report** **APP G5: Architectural Design Report** **APP G6: Traffic Impact Assessment** **APP G7: Agricultural Compliance Statement** **APP G8: Freshwater Impact Assessment** **APP G9: Landscape Guideline** **APP G10: Archaeological Impact Assessment** **APP G11: Visual Impact Assessment** **APP G12: Services Report**		✓
Appendix H:	**EMPr**		✓
Appendix I:	**Screening tool report**		✓
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 :	**The impact and risk assessment for each alternative**	Within report
Appendix K	**Town Planning Application**	✓
Appendix M	**Description of the Methodology followed to determine the significance ratings of the potential environmental impacts and risks associated with the alternatives.**	Within Report
Appendix		

SECTION A: ADMINISTRATIVE DETAILS

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

Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	Silver Solutions 3371 CC	
Name of contact person for Applicant/Proponent (if other):	Mr Riaan Geldenhuys / Allan Geldenhuys	
Company/ Trading name/State Department/Organ of State:	Silver Solutions 3371 CC	
Company Registration Number:	2011/049555/23	
Postal address:	21A Station Street, c/o Boomsticks	
	PAARL	Postal code:
Telephone:	021 020 0620	Cell: 0824496063
E-mail:	Geldenhuysrian1@gmail.com allan@boomsticks.co.za	Fax: ( )
Company of EAP:	Lornay Environmental Consulting	
EAP name:	Michelle Naylor	
Postal address:	Unit 5/ 1F , Hemel en Aarde Wine Village,	
	Hermanus	Postal code: 7200
Telephone:	-	Cell: 083 245 6556
E-mail:	michelle@lornay.co.za	Fax:
Qualifications:	Bachelor of Science (Hons); Master of Science (Rhodes University), EAPASA., SACNASP., IAIASA., cand. APHP	
EAP registration no:	EAPASA. 2019/698, SACNASP., IAIASA	
Duplicate this section where there is more than one landowner Name of landowner:	Huguemont Trust	
Name of contact person for landowner (if other):	Mr C N Louw	
Postal address:	Trichardt Street 31	
	WELGEMOED	Postal code:
Telephone:	021 913 3030	Cell:
E-mail:	cnlouw@mweb.co.za	Fax: ( )
Name of Person in control of the land:	Silver Solutions 3371 CC	
Name of contact person for person in control of the land:	Mr Riaan Geldenhuys	
Postal address:	21A Station Street, c/o Boomsticks	
	PAARL	Postal code:
Telephone:	021-0200620	Cell: 0824496063
E-mail:	Geldenhuysrian1@gmail.com	Fax:

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	Swartland Municipality	
Contact person:	Mr Alwyn Zaayman	
Postal address:	Private Bag X52	
	MALMESBURY	Postal code: 7299
Telephone	(022)-4879400	Cell:
E-mail:	AlwynZaayman@swartland.org.za	Fax: (022)-4879440

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

1.	Is the proposed development (please tick):	**New**	X	Expansion	
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				
Brownfield - The site has experienced previous disturbance through historical agricultural activities, grazing and the construction of a brick structure around the "fountain" and a man-made drainage line.					
~~3.~~	~~**For Linear activities or developments**~~				
~~3.1.~~	~~Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:~~				
~~N/A~~					
~~3.2.~~	~~Development footprint of the proposed development for all alternatives.~~				~~m²~~
~~N/A~~					
~~3.3.~~	~~Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.~~				
~~3.4.~~	~~Indicate how access to the proposed routes will be obtained for all alternatives.~~				
~~3.5.~~	~~SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives~~				
~~3.6.~~	~~**Starting point co-ordinates for all alternatives**~~				
	~~Latitude (S)~~	~~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): Riebeek Kasteel				110976.4 m²
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable): n/a				0m²
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:				110976.4 m²
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 rezoning and subdivision of Erf 878, Riebeek Kasteel, is proposed, to establish a mixed-use development. The erf is currently zoned Agriculture Zone 1 and has been actively farmed previously but has not been farmed during the preceding 10 years, except for ad hoc grazing of springbok. Therefore, there is virtually no natural vegetation left on site. Application is made for the following:

- → **Rezoning** in terms of Chapter IV, Section 25.2(a) of the Swartland Municipal Land Use Planning By-Law, 2020 from Agricultural Zone 1 to Subdivisional Area for residential use, a retirement village, parks, private open space, retail as well as roads.
- → **Subdivision** in terms of Chapter IV, Section 25.2(d) of the Swartland Municipal Land Use Planning By-Law, 2020 of the subdivisional area which is approximately 11 0977m² into 116 portions and simultaneous rezoning of the subdivided

portions in terms of Chapter IV, Section 25.2(a) of the Swartland Municipal Land Use Planning By-Law, 2020, from Agricultural Zone 1 to the following zonings as illustrated in the plans below.

Application is made for Environmental Authorization in terms of the National Environmental Management Act (NEMA) for the proposed mixed-use development on the subject erf, for the following land uses and as described in the preferred Alternative 3:

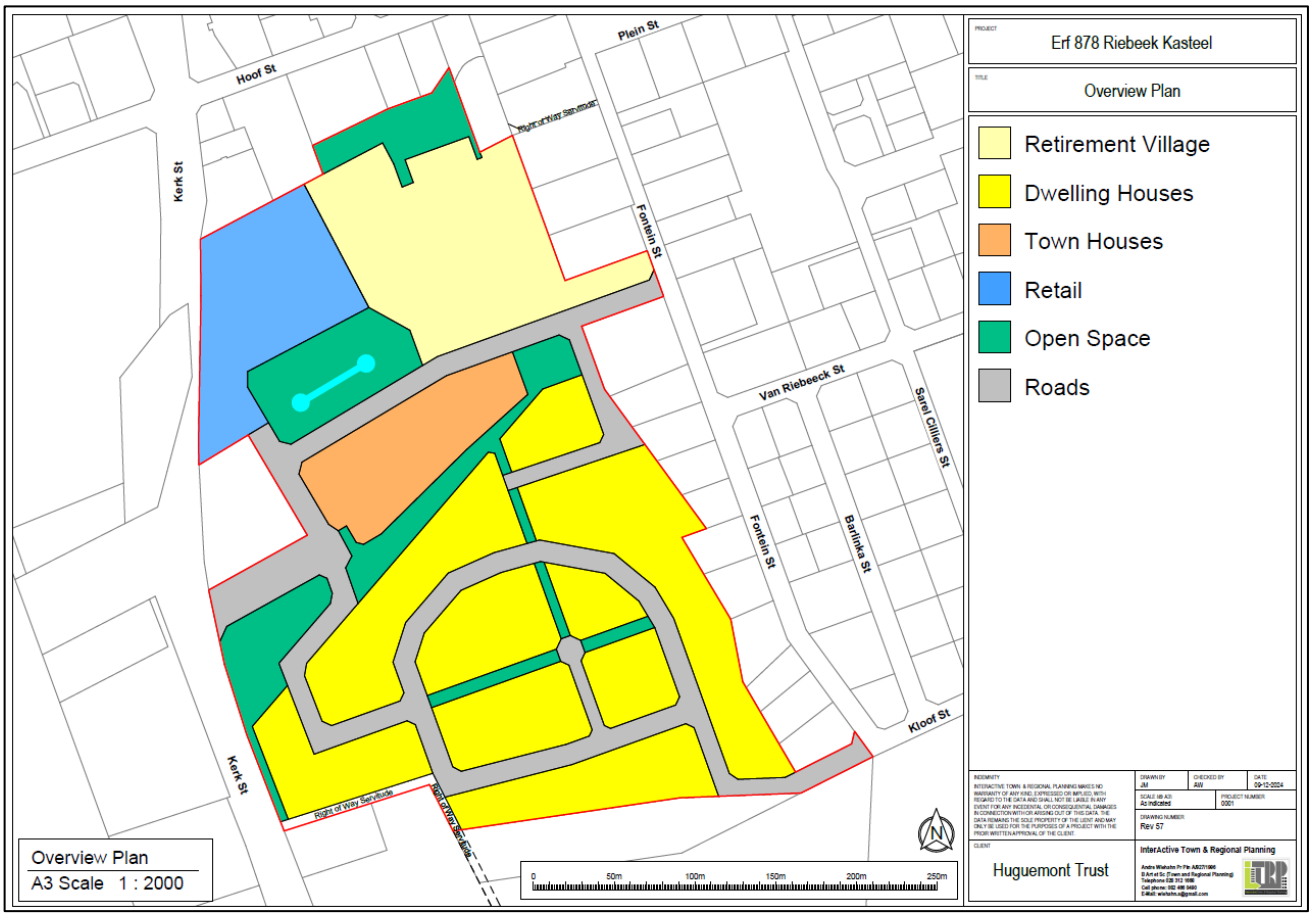


Figure 1. Alternative 3 – block land use plan proposed for Environmental Authorization.

The proposal incorporates the establishment of various development erven that will cover the development footprint of approximately 11 ha. This development will be undertaken into 5 phases in terms of Chapter VI, Section 75(g)(vi) of the Swartland Municipal Land Use Planning By-Law, 2020, as illustrated in the plan below:

- **Single Residential Zone 1 (Low Density)**:
  - 54 erven with extents of between ~600m^2 and 1759m^2 located along the slopes and top of Riebeek Hill,
  - Covering a total extent of **41794m^2.**

- **General Residential Zone 2(Town Housing):**
  - 47 erven with extents between ~198m^2 and ~491m^2 located on the northern flat section of Erf 858,
  - Covering a total extent of **13201m^2**

- **General Residential Zone 3 (Flats):**
  - 1 erf with an extent of ~**2084m^2**

- **Community Zone 3: (Institution):**
  - 1 erf with an extent of 2509m^2

- **Business Zone 1 (General Business):**
  - For retail on 2 erven with a total extent of **9627m^2**

- Note that the preferred alternative does not include a fuel station or wedding venue.

- **Open Space Zone 2 (Private Open Space):**
  - 8 erven with total extent of **15938m^2.**
  - for parks and stormwater on Erven 1, 30, 56, 57 & 113-116 including an existing stormwater servitude on Erf 1, a spring on Erf 30 and a Stormwater Retention Pond on Erf 56.

- **Transport Zone 2 (Roads):**
  - 3 Erven with a total extent **24724m^2**

Proposed bulk infrastructure:

The Swartland Municipality has confirmed that there is sufficient service capacity to service the development, see Letter in **Appendix E4,** as follows:

Water

The bulk water allocation from the Western Cape Water Supply Scheme for Swartland Municipality's Swartland System is 7900ML/a. The current abstraction is in the order of 6241.2ML/a. The additional water demand of the proposed development is 369ML/a. The availability of bulk water is therefore confirmed.

The water master plan indicated that the proposed development should be accommodated in the existing Riebeek Kasteel reservoir zone. The proposed connection to the existing reticulation system should be made to the existing 200 mm Ø pipe in Fontein Street.

Sewer

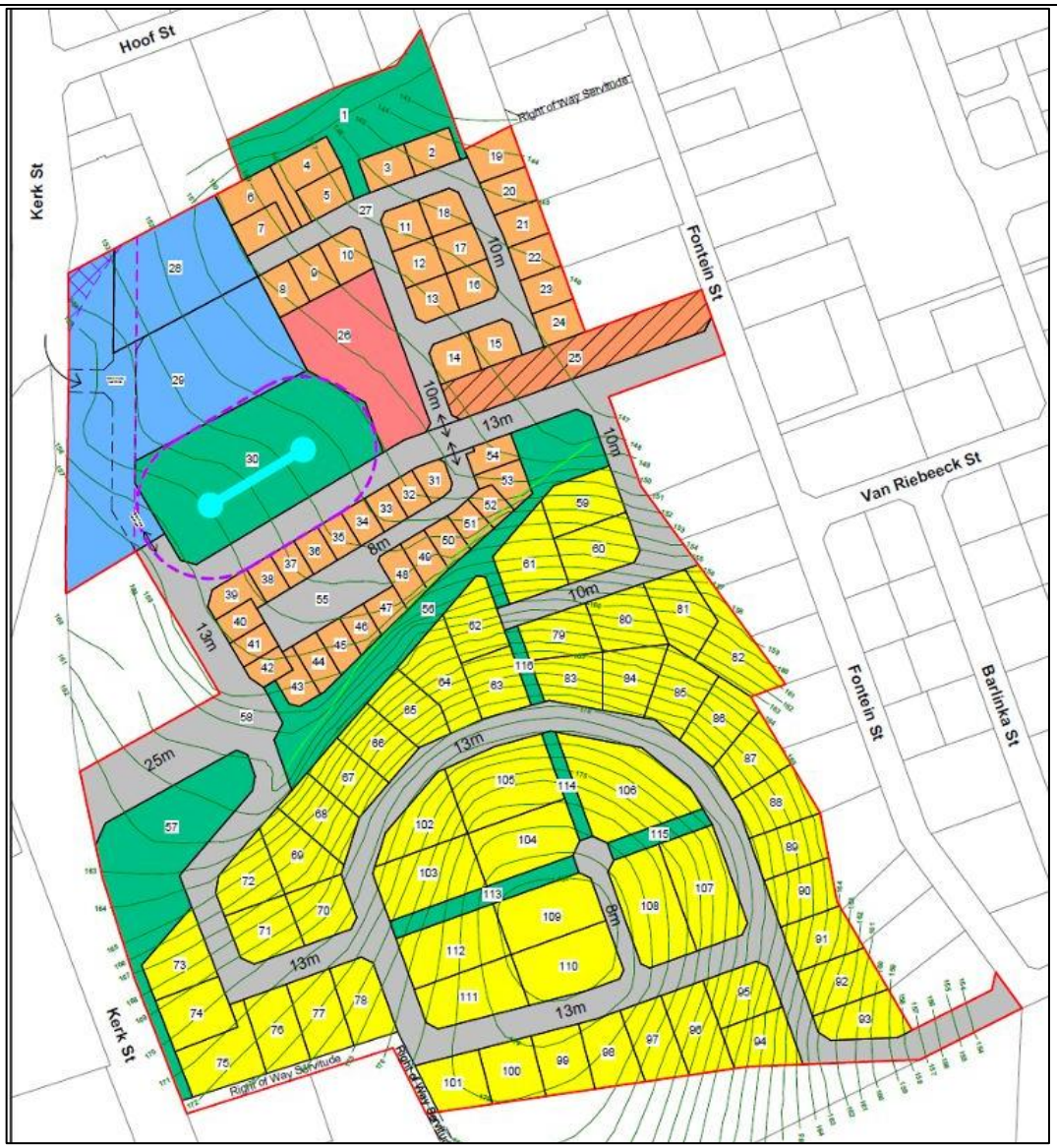
Effluent from the proposed development will be treated at the Riebeek Valley WWTW. The WWTW has a hydrological capacity of 1.9 ML/day and an organic treatment capacity of 1500 kgCOD/day. The current flow received at the works is 0.6 ML/day and the organic loading rate is 607kg COD/day. The anticipated flow from the proposed development is 0.081 ML/day and the anticipated organic load is 32 kg COD/day. There is therefore sufficient treatment capacity.

The sewer master plan indicated that the proposed development should be accommodated in the existing Riebeek Valley PS sewer drainage area. The proposed connections to the existing sewer system are to the existing 150 mm Ø outfall sewer in Fontein Street.

Solid waste

Normal refuse of the proposed facility will be handled at the Highlands Landfill and sufficient capacity exists to service the proposed development.

The establishment of a Master Homeowners' Association for the application area in terms of Chapter IV, Section 39(1) of the Swartland Municipal Land Use Planning By-Law, 2020, is proposed. The constitution and design guidelines will be submitted at a later stage for approval.



Zoning	Area	% of Total	Erven
Residential Zone 1: Low Density	41794m²	38%	54
General Residential Zone 2: Town Housing	13201m²	12%	47
General Residential Zone 3: Flats	2084m²	2%	1
Community Zone 3: Institution	2509m²	2%	1
Business Zone 1: General Business	9627m²	9%	2
Open Space Zone 2: Private Open Space	16148m²	15%	8
Transport Zone 2: Roads	24724m²	22%	3
Total	**110087m²**	**100%**	**116**

Figure 2: The preferred site development plan.

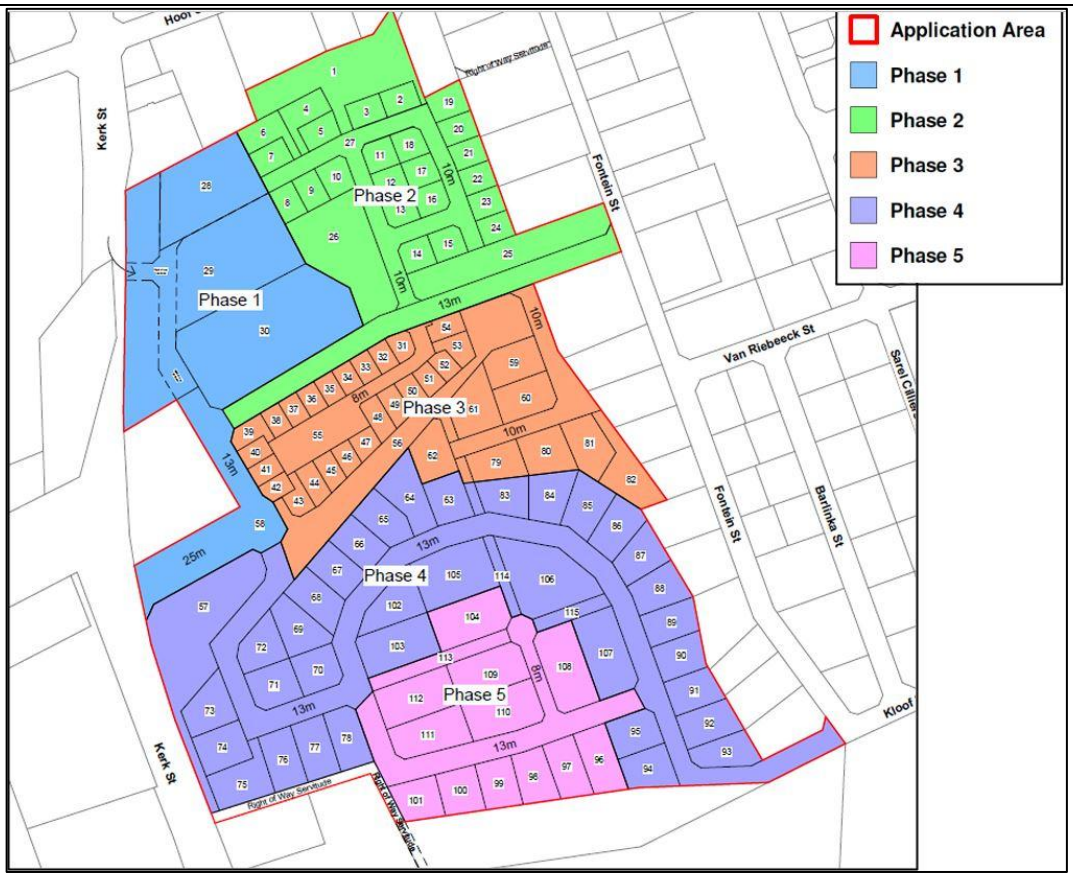


Figure 3: Phasing plan of the proposed development.

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

There is an existing access to the property from the eastern side of the site, via Fontein Street. A new one-way entrance-only to the property will be created at the northwestern corner of the property from Church Street. There is a third entrance from the west from Church Street located to the immediate south of the restaurant at The Barn. A fourth entrance to the property that will not be functional is located at the extreme southeast corner of the property that connects to the extension of Fontein Street.

A Traffic Impact Assessment was undertaken by DECA Consulting and is attached under Appendix G.

The proposed access plan for the site is as follows:

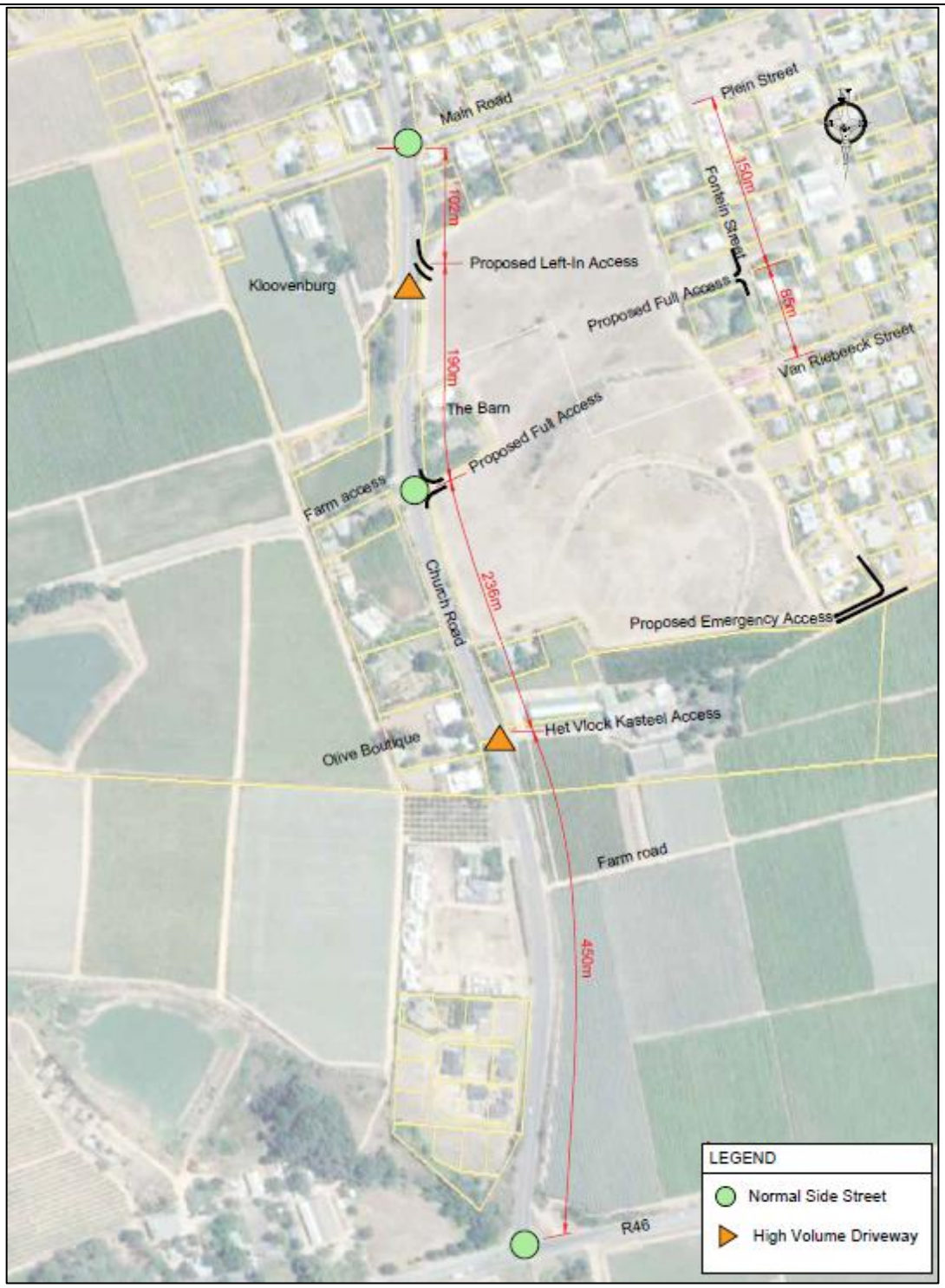


Figure 4. Proposed access plan

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	4	6	0	0	1	9	0	0	0	0	0	8	7	8	0	0	0	0	0

4.7.	Coordinates of the proposed site(s) for all alternatives:			
	Latitude (S)	33°	23‘	12.68“
	Longitude (E)	18°	53‘	37.42“

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 x**

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 x**
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 x**	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. **A Section 21c and I application will be required for development located within the regulated area (500m) of watercourses and / wetlands. This will be undertaken as a condition of authorisation.**	**YES x**	**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 x**
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")	YES	**NO x**
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	YES	**NO x**
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	YES	**NO x**
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5. *(Agricultural zones within the urban edge not subjected to this legislation)*	YES	**NO x**

3. Other legislation

List any other legislation that is applicable to the proposed activity or development.
Swartland Municipality by-laws West Coast District Municipality

4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.
The following policies were considered and are administered by the entities indicated. **<u>Integrated Urban Development Framework, 2016 – 2019</u>** The Integrated Urban Development Framework (IUDF) sets out the policy framework for transforming and restructuring South Africa's urban spaces, guided by the vision of creating 'liveable, safe, resource-efficient cities and towns that are socially integrated, economically inclusive and globally competitive, where residents actively participate in urban life'. The predominant aims are as follows: Integrated sustainable human settlements: Cities and towns that are liveable, integrated and multifunctional, in which all settlements are well connected to essential and social services, as well as to areas of work opportunities. • Efficient land governance and management: Cities and towns that grow through investments in land and property, providing income for municipalities, which allows further investments in infrastructure and services, resulting in inclusive, multi-functional urban spaces.

- Inclusive economic development: Cities and towns that are dynamic and efficient, foster entrepreneurialism and innovation, sustain livelihoods, enable inclusive economic growth, and generate the tax base needed to sustain and expand public services and amenities.

West Coast District Municipality IDP 2022 – 2027

The vision of the West Coast District Municipality IDP is to guide development towards the "Weskus the caring centre for innovation & excellence" and the mission is to "Promote drivers of change, by leading well-coordinated and innovative initiatives to achieve sustainable and integrated development of West Coast". The West Coast District Municipality IDP objectives are the following:

- Care for the social wellbeing, safety and health of all our communities.
- Promote regional economic growth and tourism
- Co-ordinate and Promote the development of bulk and essential services and transport infrastructure
- Foster sound relationships with all stakeholders, especially local Municipalities
- Maintain Financial Viability and Good Governance.

Swartland Municipality IDP 2023

The purpose of the Swartland Municipality IDP 2023 informs the municipality's budget and prioritizes projects as per the needs of the communities. It is considered one of the important planning and management tools modern-day municipalities have. From this document the following extracts are valued to contribute towards this application:

LAND REQUIREMENTS

Land requirements for future settlement development are tabulated below:

WARDS	12
Land Required for:	Riebeek Kasteel
Subsidized housing	41ha
Affordable housing	30.6ha
Private housing	100ha
Total land required: 5 years	23.1ha
Total land required: 20 years	171.6ha
Land as per SDF	59.5ha
Shortfall	112.1ha

LAND SUPPLY AND SETTLEMENT FORM

To limit the extent of land required, settlement Form and Function should be enhanced through integration:

Wards	Ward 12
Towns	Riebeek Kasteel
Functional Integration	A commercial and social node in Riebeek Kasteel East. Promote formal pedestrian walkways between Riebeek Kasteel and Riebeek Kasteel East.
Social Integration	Development reinforced along connecting route between Riebeek Kasteel and Riebeek Kasteel East.
Offer a wider variety of housing types	**Different housing typologies densities in brown field developments. Infill higher density development along connecting route.**
Spatial Integration	Mixed use along link road between Riebeek Kasteel East and central part of Riebeek Kasteel.

DEVELOPMENT PROPOSALS PER SWARTLAND SETTLEMENT:

The themes and strategies translate into the following development proposals for Swartland settlement.

Riebeek West, Ongegund and Riebeek Kasteel: As small agricultural service centre, development proposals of the Valley include:

- Enhance tourism and agri-tourism, and protect heritage resources
- Provide residential land for Human Settlement housing schemes and private development that promote mix use and integration settlements.
- Maintain and strengthen agricultural service centre

Swartland Spatial Development Framework, 2023 – 2027

The purpose of the Swartland Spatial Development Framework (SDF) is to guide growth and development in the Swartland's Municipal area in a sustainable manner. Hence, future growth, development and land use planning will embrace the spatial vision and principles to protect and develop integrated, sustainable settlements and liveable environments and enable economic and social prosperity.

The following aspects from the SDF is relevant to the application site:

Land Demand

Additional land required in Swartland urban areas

WARDS	**12**
Land Required for:	**Riebeek Kasteel**
Private housing	100ha

Land Supply

- **Settlement Form and Function**

Settlement Form: Densification and Intensification Densification ensures optimal use of land and efficient use of infrastructure and services. Densification is strongly promoted in new housing developments and existing precincts in Malmesbury, Moorreesburg, Kalbaskraal, Riverlands and Chatsworth, whilst densification in the Riebeek Valley, Koringberg, Darling and Yzerfontein is cautiously promoted.

Proposed densification targets for Swartland settlements

		Average Density Targets du/ha		
Towns	**2016**	**2017**	**2022**	**2027**
Riebeek Kasteel	8.2 du/ha	8.5 du/ha	8.5 du/ha	8.5 du/ha

Settlement From: Restructuring and Integration

Integration					
Wards	**Towns**	**Functional Integration**	**Social Integration**	**Offer a wider variety of housing types**	**Spatial Integration**
Ward 12	Riebeek Kasteel	A commercial and social node in Esterhof. Promote formal pedestrian walkways between Esterhof and Riebeek Kasteel.	Development reinforced along connecting route between Esterhof and Riebeek Kasteel.	Different housing typologies & densities in brown field developments. Infill higher density development along connecting route.	Mixed use along link road between Esterhof and central part of Riebeek Kasteel.

Riebeek Kasteel

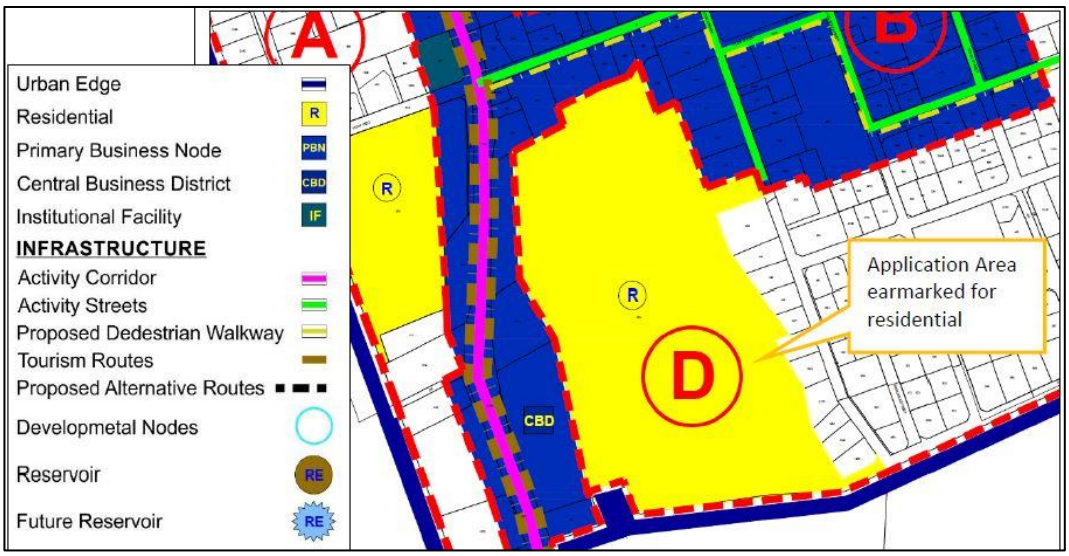
Riebeek Kasteel is situated approximately 20 kilometres northeast of Malmesbury and has access via the Paarl Road (Divisional Road 24/1) to the R45 that connects Malmesbury with Hermon. The R45 is connected to the N7 via the R311 (main route in the Riebeek Valley). The town is located along the slopes of Kasteelberg and is surrounded by some of the oldest vineyards in South Africa. The town's characteristic grid layout is encouraged by the surrounding vineyards along with intensive agricultural uses adjacent to the urban edge.

SPACE, BUILT			
	Elements	**No.**	**Proposals**
Change	Residential	55	Increase density by 2027 from the current 8.2 units per hectare to 8.5 units per hectare in Riebeek Kasteel.
		56	The low-density rate preserves the unique identity and character of Riebeek Kasteel. Higher residential developments and mixed uses should be encouraged along activity streets in the town.
	Commercial	63	Support development of CBD and secondary nodes and neighbourhood commercial facilities.
Develop	Residential	72	Provide 171.7ha in Riebeek Kasteel for future growth over next 20 years, of which 67.3ha is vacant land as identified per Vacant Land Audit.
		75	Provide adequate land for different housing topologies.
		76	Provide and support development of housing for retirees.
		82	Allow for minimum subdivision size of single residential erven of 500m² and rural living erven in identified zones of 1000m² and 2000m² respectively.

LAND USE ZONE PROPOSALS FOR RIEBEEK KASTEEL

The application area is located within Zone D which clearly supports the development proposal as reflected in the following extracts from the SDF:

ZONE	RIEBEEK KASTEEL LAND USE ZONES	Low Density Residential Uses	Medium Density Residential	High Density Residential Uses	Secondary Educational Uses	Place of Education	Professional Uses	Business Uses	Secondary Business Uses	Place of Worship	Institution	Guest houses	Authority	Sport/Recreational Facilities	Industries & Service Trade
D	Zone D consists of a residential as well as institutional character with government functions (cemetery). There are mixed density residential uses with opportunities for infill development.	X	X	X Along activity streets/corridors & At proposed future residential development nodes	X	X	X	X Along activity streets/corridors & At proposed future residential development nodes	X Along activity streets/corridors & At proposed future residential development nodes	X	X	X	X	X	



In terms of the Swartland SDF the application area is not within the Riebeek Kasteel Heritage Protection Overlay Zone (HPOZ).

The application proposal is in accordance with all relevant land-use management policies and strategies for the area, however a lesser amount of business development is proposed in the application.

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.	
The following policies were considered and are administered by the entities indicated.	
Municipality SDF	The SDF indicates the area to be developed as residential area within the urban edge (adhered to fully).
National Environmental Management Act (Act 107 of 1998)	Relevant regulations govern content and process of EIA (adhered to fully)
Guidelines on Alternatives	Used to determine reasonable and feasible alternatives and also the mandatory assessment of the no – go alternative (adhered to fully)
Guideline for Environmental Management Plans	Definition of management actions to avoid , eliminating, offsetting, or reducing adverse environmental impacts during construction and operational phases and enhancing positive impacts (adhered to in high extent)
Guidelines on Need and Desirability	Used to answer whether this is the right time and is it the right place for locating the type of land-use/activity being proposed? In other words, is this development considered wise use of land – i.e. the question of whether the development could be considered as sustainable use of land, keeping in mind the triple bottom line of economic, social and environmental feasibility (fully adhered to)
Waste Minimisation Guidelines for Environmental Impact Assessment Review	Used to determine the limitation of generation of waste and the re-use thereof to limit negative environmental impacts and to maximize the re-use of waste resources (fully adhered to)
Guidelines on Public Participation	Guideline used to determine extent of public participation required and based on three variables of : o the scale of anticipated impacts of the proposed project; o the sensitivity and the degree of controversy of the project; and o the characteristics of the potentially affected parties. (adhered to fully).
Guideline on Exemption Applications	There were no exemption applications in this Basic Assessment process (adhered to fully).

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 following themes and their sensitivity ratings are identified in the Screening Tool Report:

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

Note the following information relating to these themes:

Agriculture Theme (Very high)
An Agricultural Compliance Statement is in process.

JOHANN LANZ
Director & Principal Consultant
SOIL SCIENTIST (Pr.Sci.Nat)
Phone: +27 (0) 82 927 9018

Animal Species Theme (High)

The Screening Tool Report indicates that the Animal Species Theme is of High Sensitivity. The site, however, is located within the town of Riebeek Kasteel and has been transformed through previous agricultural activities. It is therefore assumed that this inclusion is based on the insect assemblages associated with the Swartland Shale Renosterveld, however, an Animal Species Assessment is not considered to be necessary. Detailed on-site investigation indicated the site to be inside the built-up urban area and the vegetation on site consists mainly of pioneer species as determined by a specialist Botanical Assessment. The site is completely surrounded by extensive residential and mainly mono-culture agricultural developments, with a tar road running immediately adjacent to the site. In terms of Avi-fauna, site investigations indicated that, due to the close proximity to the altered environment presented by the existing residential garden developments, the avian fauna that occurred were reminiscent of typical domestic garden species.

Communications between DEA&DP and previous NEMA processes taken place to date have confirmed that no further Animal Species assessment is required.

Aquatic Biodiversity Theme (Very high)

The Web-based Screening Tool indicates a Very High Sensitivity for this theme. The site is highly transformed with no Aquatic features mapped on site, however there is a “fountain” on the northern end of the site. A Freshwater specialist has been appointed to determine the presence of any watercourses on site.

Archaeological and Cultural Heritage Theme (Very high)

A Heritage Impact Assessment has been completed which includes A Visual Impact Assessment, Archaeological Impact Assessment – these reports are currently under review with Heritage Western Cape.

Civil Aviation Theme (High)

The Screening Tool indicates a High Sensitivity. The subject site is located within the town of Riebeek Kasteel, and proposed development is not significantly different from existing development. No further assessment is required.

Defence Theme (Low)

The Screening Tool indicates a Low Sensitivity. The subject site is located within the town of Riebeek Kasteel. No further assessment required.

Palaeontology Theme (Low)

According to the Web-Based Environmental Screening Tool, the Palaeontology Theme is considered of Low sensitivity. A Heritage Impact Assessment has been undertaken.

Plant Species Theme (Medium Sensitivity)

A Botanical Impact Assessment has been undertaken to cover the Plant Species and Terrestrial Biodiversity Themes. No further actions required.

Terrestrial Biodiversity Theme (Very high)

A Botanical Impact Assessment has been undertaken to cover the Plant Species and Terrestrial Biodiversity Themes. No further actions required.

Based on the site sensitivities above, the following specialist assessments are identified for the site:

No	Specialist assessment	Assessment Protocol
1	Landscape/Visual Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
2	Archaeological and Cultural Heritage Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
3	Palaeontology Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
4	Terrestrial Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Terrestrial_Biodiversity_Assessment_Protocols.pdf
5	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Aquatic_Biodiversity_Assessment_Protocols.pdf
6	Socio-Economic Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
7	Plant Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Plant_Species_Assessment_Protocols.pdf
8	Animal Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Animal_Species_Assessment_Protocols.pdf

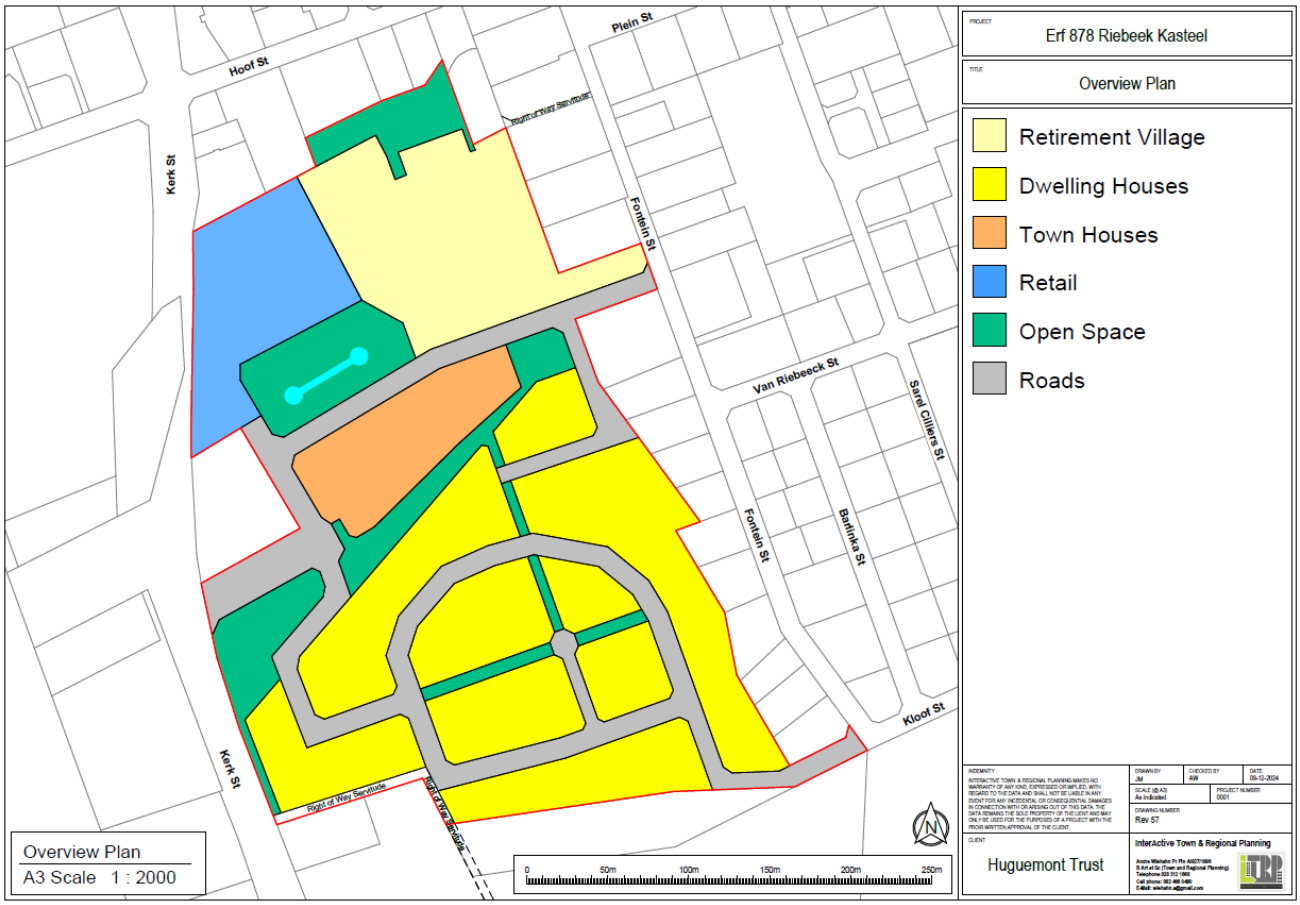
1. Landscape / Visual Impact Assessment – conducted and included in the Heritage Impact Assessment which is currently under review by Heritage Western Cape.
2. Archaeological and Cultural Heritage Impact Assessment - conducted and included in the Heritage Impact Assessment which is currently under review by Heritage Western Cape.
3. Paleontological Impact Assessment – not requested by Heritage Western Cape
4. Terrestrial Biodiversity Impact Assessment – A Botanical Impact Assessment has been undertaken.
5. Aquatic Impact Assessment – Specialist has been appointed, and the assessment is underway. The report will be included in the final BAR
6. Socio-Economic Impact Assessment – the preferred alternative no longer includes the Service and Fuel Station and for this reason, a Socio-Economic assessment is not required.

7. Plant species theme – covered in the Botanical Impact Assessment
8. Animal Species Theme – As per the details above, no further assessment required under this field.

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Application for Environmental Authorization is made for the following proposed mixed use development on Erf 878 Riebeek Kasteel:



The application includes the Rezoning and subdivision to create a mixed-use development which includes erven dedicated for a retirement village and frail care component, single residential dwellings, town housing complex, retail space, open space and road and access infrastructure. The following listed activities are applicable to the proposed development:

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.
12	**The development of** (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or **(ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs-(a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding** (aa) the development of infrastructure or structures within existing ports or harbours	Erf 878 is located within what the Swartland Municipality have demarcated as the urban edge and has a zoning of Agriculture 1. Stormwater drainage line runs along the northern extent of the property. The footprint of the proposed development will extend to closer than 32 metres from the drainage channel.

	that will not increase the development footprint of the port or harbour; (bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies; **(dd) where such development occurs within an urban area;** (ee) where such development occurs within existing roads, road reserves or railway line reserves; or the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.	
19	**The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse** but excluding where such infilling, depositing , dredging, excavation, removal or moving (a) will occur behind a development setback; (b) is for maintenance purposes undertaken in accordance with a maintenance management plan; (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (d) occurs within existing ports or harbours that will not increase the existing footprint of the port or harbour; or (e) where such development is related to the development of a port or harbour, in which case Activity 26 in Listing Notice 2 of 2014 applies.	A stormwater drainage channel runs on the northern extent of Erf 878 and the development footprint may involve the movement of more than 10 cubic metres of soil.
27	**The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation**, except where such clearance of indigenous vegetation is required for (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.	This agricultural zoned site has not been subjected to agriculture for the past 10 years and therefore is considered to be natural under NEMA 2014 (as amended)
28	**Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture,** game farming, equestrian purposes or afforestation on or **after 01 April 1998** and where such development: (i) **will occur inside an urban area, where the total land to be developed is bigger than 5 hectares;** or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.	This agricultural zoned site was used for agriculture after 1 April 1998 and is located inside the urban edge of Riebeek Kasteel and is ~11 hectares in size.
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** except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. **In 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	The 2017 vegetation map indicates the natural vegetation on Erf 878 to be Swartland Shale Renosterveld that is listed as critically endangered under Section 52 of NEM: Biodiversity Act. But there is none of this vegetation left on site.

	that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; (ii) Within critical biodiversity areas identified in bioregional plans; (iii) Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; or (iv) On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or (v) on land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.	

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, an amended application form must be submitted to the competent authority.

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

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

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

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

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

Location of the site

Riebeek Kasteel is situated approximately 80 km north-east of Cape Town in The Riebeek Valley in close proximity of its sister town Riebeek West and approximately 22.5km northwest of Malmesbury and 5km south of Riebeek West respectively.

The town consists of a central business district (CBD) with community, social, retail, tourist and educational facilities as well as residential areas mostly characterized by conventionally single title residential plots and include several tourist accommodation facilities. The town is also characterized by medium to higher density residential areas in and around the CBD with higher density residential areas in Esterhof along the eastern boundary of the town.

The preferred site alternative (Erf 878) is located on the south-western side of the Riebeek Kasteel town and access to the application site is presently obtained from Fontein Street. It is situated on a hill sloping to the north and western directions, ensuring scenic views of the valley down below.

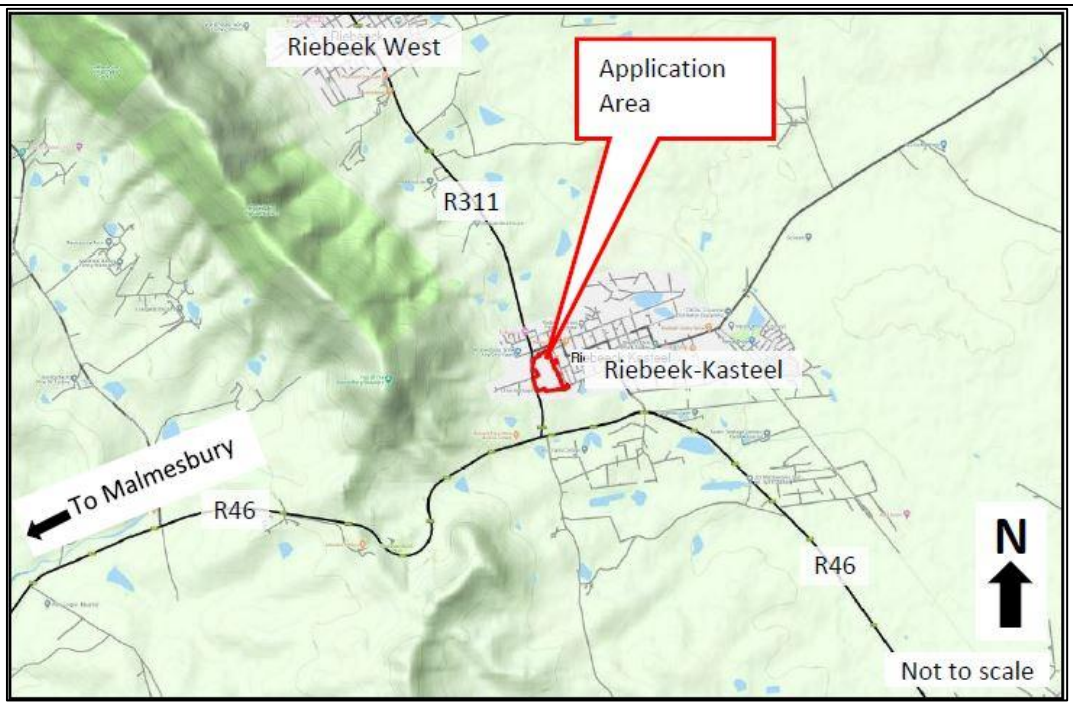


Figure 5: Locality Map

Local Context

Within the local context, the application area is located on the south-western side of Riebeek Kasteel town and between Church Road (R311) and the existing single residential erven along Fontein Street and southwest of the CBD. The application area currently obtains access from Fontein Street to the east of the application area.

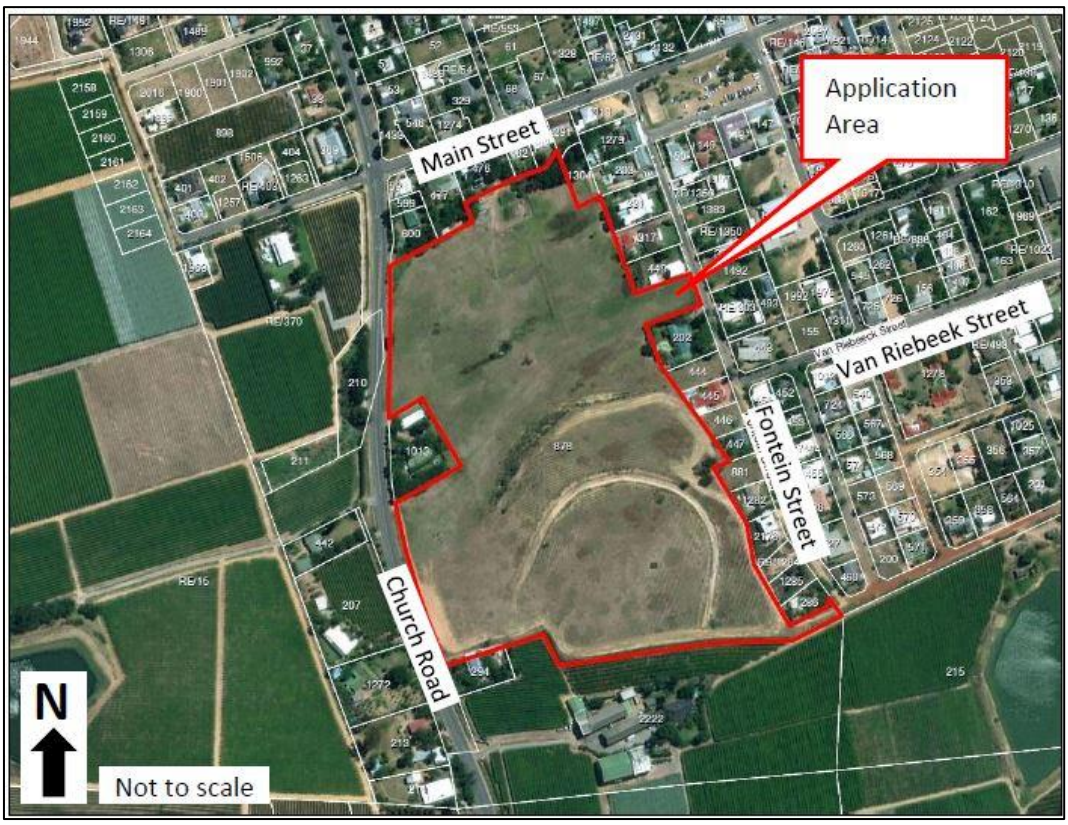


Figure 6: Locality Plan – Local Context

Description of vegetation and topography of the site

The 2018 vegetation map for South Africa indicates that the natural vegetation that originally occurred on site was Swartland Shale Renosterveld. This vegetation type is described to be critically endangered under Section 52(1)(a) of the NEM: Biodiversity Act (10 of 2004), the Revised National list of Ecosystems that are Threatened and In Need of Protection. The reason why this vegetation type is listed as critically endangered is because it existed on a soil type that was commonly converted to agriculture as a viable land use. As the whole erf had been repeatedly farmed with agricultural crops in the past for a number of years, but longer than 10 years ago, there is very little, if any, of this natural vegetation left on the property. The property is covered in pioneer vegetation such as renosterbos (*Erythropappus rhinocerostis*), kraalbos (*Galenia africana*), black wattle (*Acacia mearnsii*), kikuyu grass (*Pennisetum clandestinum*), *Cynodon* species and other pioneer grasses and vegetation (see Specialist Botanical Report in **Appendix G1**).

Erf 878 has an elevated small hillock on the southern lower third of the property at a maximum height of 180m.a.m.s.l. From this high point the topography slopes down for a height of 37 metres to the lowest point in the north-eastern corner of the property at 143m.a.m.s.l. There are two man-made stormwater furrows running across Erf 878 that both originate from the very extensive agricultural developments on the lower foothill slopes of the mountains to the west. Another drainage line terminates in a seasonal fountain that emerges above-ground more or less in the middle of the property during the wet winter runoff months but otherwise dries up during the dry summer months (see Photos in Appendix C).

The proposal

The intent of the owner is to develop a residential township with a business component, consisting of the following components:

- 54 Single Residential erven with extents between 600m² and 1759m².
- A Retirement Village consisting of 23 erven of between 295m^2 and 491m^2, a frail-care facility and 1 erf for flats.
- A Townhouse complex consisting of 24 erven, with erven ranging between 198m^2 and 296m^2.
- Two Business erven intended for a small shopping centre.
- Eight Private Open Space erven for the purposes of parks, walkways and stormwater.
- Three Transport erven for the purposes of public and private roads.

Figure 7: Design model of the proposed development with buildings.

The development objective is to establish a sustainable residential development with a supporting business component, sensitively taking the topography of the application area into consideration and due respect and integration to and with the existing character of the town aligned with the relevant spatial policies.

The aim is to ensure that the proposal preserves the existing historic character and heritage of the town, while adapting to changing trends in housing and lifestyle needs, urban growth and town planning guidelines to ensure the long-term sustainability of Riebeek Kasteel.

The proposed residential township has the potential to provide for the following land-use components:

- → Low Density single residential dwellings
- → Town housing in retirement village
- → Duplex Town-housing
- → Apartments in retirement village
- → Apartments
- → Frail-care facility
- → Shops
- → Parks
- → Private Open Space for stormwater servitude
- → Roads

The proposed Development Components

All proposed development will adhere to the proposed architectural guidelines as well as the Zoning Scheme regulations in accordance with Swartland Municipal Land Use Planning By-Law, 2020.

Internal Road Network

The two primary access points which will allow access to the proposed development are from Church Street (R311) to the west, just above Erf 57 and from Fontein Street in the east just below Erf 25. A direct entrance to the business is provided off Church Street (R311) by a proposed left in slip lane. An emergency exit is provided in the south-eastern corner of the application area which flows into Fontein street.

The two primary access points from the R311 to the west and Fontein Street to the east are linked by a proposed internal 13m main collector public road, providing direct access to the proposed shopping centre, the retirement village, the parks and the townhouse complex as well as linking up with proposed internal 10m private roads providing access to the single residential erven.

Retirement Village

A retirement village is proposed in the north-east section of the application area on subdivided Erven 1-27, providing convenient and walkable access for the elderly residents to the adjacent central business district to the east as well as the adjacent park to the south-west of the retirement village.

The total extent of the area covered by the retirement village amounts to 18 297m^2. The retirement village consists of an internal 10m road on Erf 27 with an extent of 3224m^2 which provides access to all proposed retirement village housing units on Erven 2-24. The erven ranging between 295m^2 and 491m^2 with a total extent of 7691m^2. Erf 26 has an extent of 2509m^2 intended to accommodate a frail care facility. The retirement village is proposed to ensure a secure complex with controlled access.

Erf 1 also forms part of the retirement village with an extent of 2785m^2 and accommodates a stormwater servitude to allow for a storm water canal and run-off catchment into a retention pond which is proposed to be located adjacent

to the retirement village. Erf 1 will also be used as a picnic area for the retirement village with a playground for visiting grandchildren.

The applicable zoning for the retirement village is General Residential Zone 2 for the single-title townhouses, General Residential Zone 3 for the flats, Community Zone 3 for the frail-care centre and Transport Zone 2 for the internal road.

The Open Space Zone 2 erf accommodates the stormwater servitude adjacent to the retirement village.

One controlled access point to the retirement village will be provided with a parking area for the frail-care facility and a visitors parking area for the apartments both situated on opposite sides at the main entrance to the retirement village. The access point is from the proposed internal main public road to the south of the retirement village which joins up with Fontein Street to the east and Church Street to the west of the application area.

Riebeek Kasteel currently offers no other retirement / frail care facilities and will contribute to attract more elderly people to the town. This also serves in compliance of the SDF's requirements in inter alia providing a variety of housing types.

According to the SDF, 2023-2027, Riebeek Kasteel presents the potential to serve as a haven for retirees as a result of the tranquil, rural and scenic landscape, which in turn would contribute to the stimulation and growth of the local economy of this town.

A frail-care facility is proposed to be available as part of the retirement village. This proposal is foreseen to attract retirees, trigger the establishment of medical facilities in town, provide extra buying power and constitute a stimulus for further business opportunities in the area.

Figure 8: Retirement Village component

Business Zone 1 (General Business): Erven 28 & 29: Retail

The proposed retail is located on the R311 Church Street in the north-west section of the proposed development adjacent to the retirement village which is to the east thereof and the park to the south thereof. The following sketches show potential typologies of the proposed shopping centre.

Figure 9: Sketches of the proposed shopping centre.

Retail is proposed on both Erven 28 and 29. Erf 28 will gain access via a right of way servitude registered over Erf 29.

The motivation for the proposed business is that it caters for residents mainly within the proposed development, outside of the development within Riebeek Kasteel and for through-traffic outside of the Riebeek Kasteel area and could thus be considered to be primary and secondary business facilities. This erf is also adjacent to the existing CBD to the east of the application area with Business Zone 1 zonings.

For vehicles travelling in a southerly direction, access to the business component is from the regional R311 road Church Street to the west of the application area with a left in slip lane and which exits on the proposed internal main road south of the business component joining up again with the R311 Church Street, just above Erf 57.

For traffic travelling in a northerly direction, access is gained from the proposed internal main road, which can be accessed from the R311 Church Street just above Erf 37.

The location of the proposed business component directly adjacent to the R311 Church Street is highly strategic and accessible.

A traffic impact assessment has been performed by professional traffic engineers to determine the required traffic parameters to service the proposed retain centre and to remain within the traffic and design requirements of the local municipality.

The proposed business erven are foreseen to complement the existing businesses in the town as well as to through-traffic and thereby stimulating the local economy and create employment opportunities for the local community. Furthermore, the strategic location presents a marketing opportunity for Riebeek Kasteel.

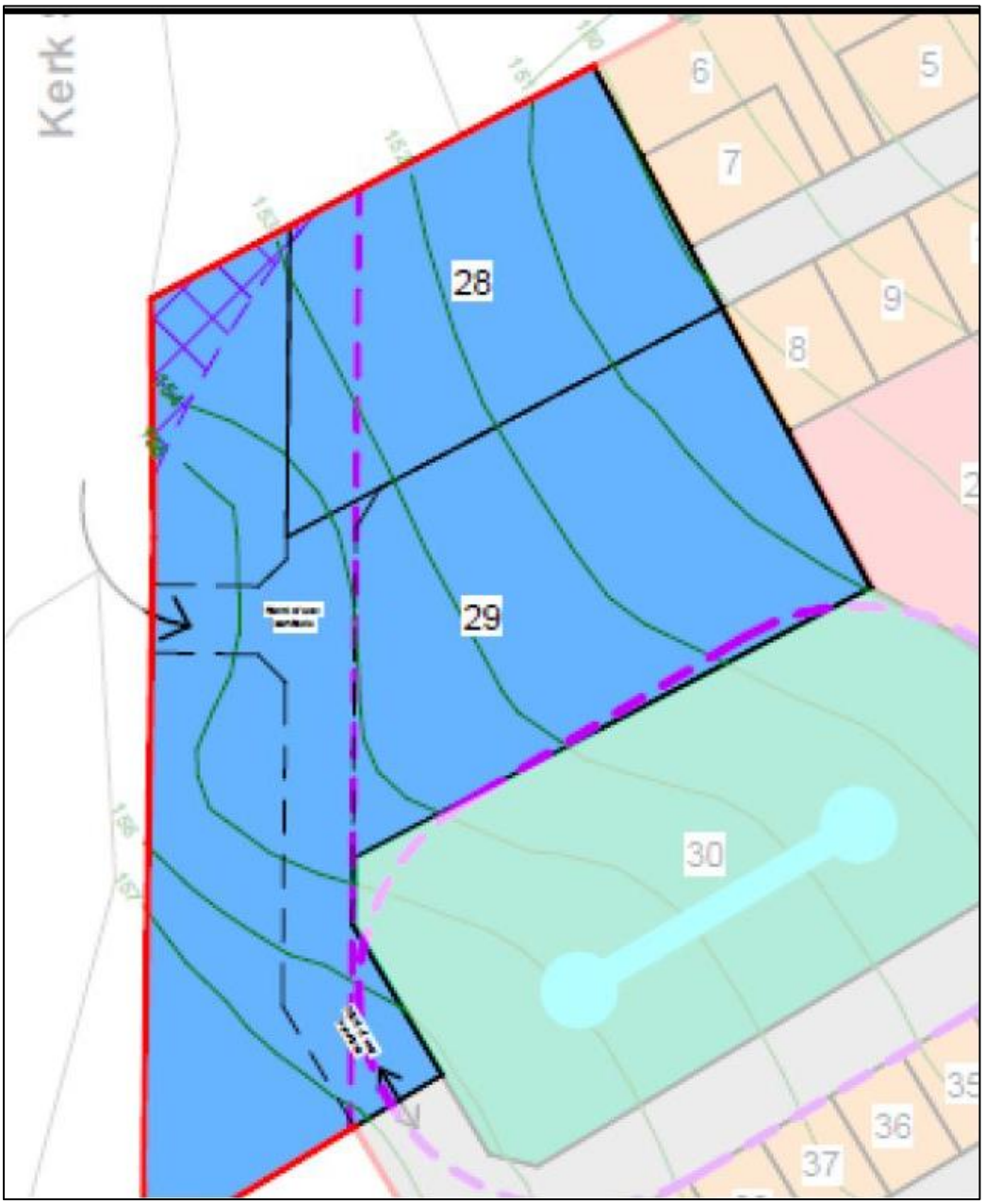


Figure 10: Business component.

Erf 30, 56 & 57: Communal Parks

A park/ square is proposed around the existing fountain and stream and is located more or less central to the proposed higher density residential uses, namely the retirement village, the business premises along the R311 Church Street as well as the proposed town-house complex.

The three primary parks are on Erven 30, 56 & 57. The total area of these open space erven is 11 818m^2 and will be rezoned to Open Space Zone 2: Private Open Space to accommodate a square and other parks.

The park on Erf 30 with an extent of 4 945m^2 which will incorporate the existing natural water feature as an historic focal point/ landmark, will provide recreation and relaxation opportunities and form part of a green belt together with the other parks within the proposed development, which will support the rural/ relaxed character of the area.

Access to the park is provided from the proposed internal main road between the park and the town-housing complex which connects the R311 Church Street to the west and Fontein Street to the east.

The proposed park will provide the opportunity to accommodate markets and other activities within a controlled and managed environment ensuring the maintenance of this community facility.

The parks on Erven 67 & 57 have a total extent of 6873m^2. Erven 67 & 57 provides an open space corridor from east to west and allows for unobstructed sight lines from Church Street to the existing historical town landmark church steeple in compliance of the visual impact consultant and will also contribute to the rural feel of the area.

Private open space areas are also provided within the gated retirement village and single residential component and is addressed in the mentioned sections.

Figure 11: Parks & Square Component

Erven 31-55: Town Housing Accommodation

A town house complex is proposed consisting of 24 erven. The erf sizes vary between 198m^2 and 296m^2 and covers a total extent of 7315m^2.

The town housing erven are proposed to be zoned General Residential 2 to accommodate sectional title duplex townhouses within a secure complex.

Controlled gate access to the complexes is proposed.

The proposed townhouses within a gated security complex provides an alternative form of housing, to the conventional single residential dwellings on larger individual erven, with benefits including higher security, a "lock-up and go" situation and lower maintenance costs.

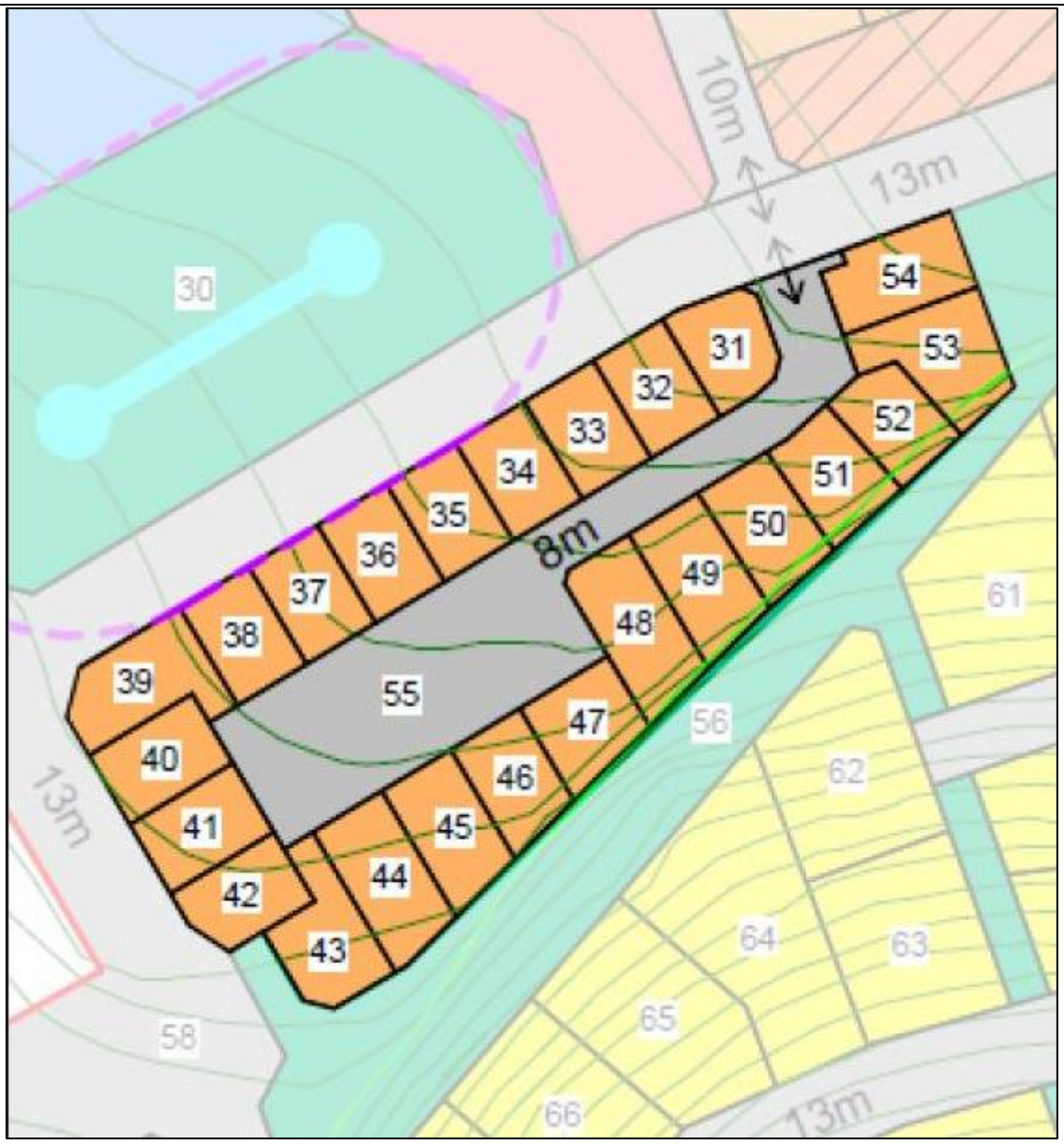


Figure 12: Town Housing Component

Single residential dwellings

The single residential component is proposed along the higher slopes of the hill providing views of the town and are laid out in conjunction with the topography / contours of the application area and forms a half circle with along the hill contours as well as a grid pattern comprising of roads and open space. The road towards Fontein Street will be gated but serve as an emergency exit.

This component consists of 54 Single Residential erven with extents of between 600m^2 and 1759m^2 located along the slopes and covering a total extent of 41794m^2.

Erf sizes are mostly consistent with the existing surrounding single residential erf extents.

The single residential component includes four narrow private open space erven, Erven 113-116 to provide walkable access through the single residential component of the development, it will provide sufficient space for the planting trees and simultaneously serve as a stormwater corridor.

From a visual impact point of view, it is proposed to provide landscaping and restrict the heights of the dwellings along the streets to soften the visual impact of the area. Also refer to the Architectural Design Parameters as reflected in the photomontage corridor view towards the church steeple and Riebeek Hill respectively:

Figure 13: Single Residential Component

Figure 14: Proposed architectural style typologies.

Refuse areas

Refuse areas will be provided at the entrance to each of the development components at the access point to allow for safe and convenient refuse removal and will adhere to town planning and building parameters in terms of size, location, distance and construction.

The proposed 13m streets within the single residential neighbourhood will provide sufficient and convenient access for refuse removal vehicles to manoeuvre.

Home-Owners' Association

A Master Home-Owners' Association will be established with a Constitution and Design Guidelines. The constitution and design guidelines are attached as part of the Architectural Design Parameters document.

Engineering Services:

Sufficient water, sewer and solid waste service capacity is available for the proposed development, (refer to **Appendix E**).

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 K**.

The Erf 878 is located within the urban edge of Riebeek Kasteel and is zoned Agricultural Zone 1. It is therefore not appropriately zoned for the proposed development. However, the appropriate application for subdivision and rezoning has been lodged with the Swartland Municipality.

The proposal will be located on vacant land within the urban edge, which is earmarked for residential and business development by the Municipal SDF, 2023-2027. All required legislative procedures are being followed to ensure the minimizing of any negative impacts and the maximizing of positive impacts on the environment. The proposed development has been designed to be sensitive to the existing character and heritage of the environment.

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 existing development approvals for the site. Erf 878 is the only large enough piece of vacant land located within the urban edge on the western side of Riebeek Kasteel to accommodate the proposed urban development. Erf 878 is indicated in the approved SDF for Riebeek Kasteel for residential and business development. Erf 878 is zoned Agriculture I and is not appropriately zoned for residential and business development. An application for the appropriate rezoning and consent use to allow the proposed residential and business development has been lodged with the Swartland Municipality to run concurrently with the application for environmental authorisation submitted to the relevant authority under NEMA 2014 as amended.

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

The PSDF makes provision for the rezoning of land for development in urban areas.

The Western Cape Provincial Spatial Development Framework (PSDF) provides overarching guidance for spatial planning and land use management in the province, including the Swartland Municipality. It emphasizes sustainable development, economic growth, and the creation of integrated, resilient settlements. The PSDF supports mixed-use developments in urban areas to promote economic vitality and social cohesion.

In alignment with the PSDF, the Swartland Municipality has developed its own Spatial Development Framework (SDF) to guide local development initiatives. The Swartland SDF (2023-2027) aims to create sustainable settlements and liveable environments, facilitating economic and social prosperity. One of its key objectives is to enhance economic mobility and sustainable settlements by intensifying land uses within designated urban edges, thereby promoting mixed-use developments.

The Swartland SDF outlines specific strategies to achieve this, including:

- Promoting rejuvenation of settlements while preserving precinct character, which encompasses infill development, increased floor factor, and opportunities for subdivisions or renewal projects.
- Enhancing landscapes and utilizing assets as tourist destinations, supported by the provision of non-motorized transport (NMT) infrastructure and well-maintained pavements.

4.2	The Integrated Development Plan of the local municipality.

Since Erf 878 is located within the urban edge of Riebeek Kasteel and the proposed residential and business development is included in the 2023 Integrated Development Plan (IDP) of the Swartland Municipality, the following points are relevant:

1. Alignment with the IDP

The inclusion of Erf 878 in the 2023 IDP suggests that the proposed mixed-use development aligns with the municipality's strategic priorities for growth and infrastructure provision. The IDP emphasizes:

- Sustainable urban expansion within designated urban edges.
- Mixed-use developments that promote economic activities alongside residential growth.
- Efficient use of existing infrastructure to minimize service delivery costs.

2. Urban Edge and Land Use

Being within the urban edge, Erf 878 is strategically positioned for development without contributing to urban sprawl. This supports:

- Infill development and densification in line with the Western Cape PSDF.
- Efficient land use for residential and business purposes, maximizing the development potential.

3. Rezoning and Compliance

Since the IDP includes this development:

- Rezoning applications for mixed-use purposes are likely to be supported, provided they comply with the Swartland Municipality's Zoning Scheme By-Law.
- Compliance with environmental and infrastructural requirements will be essential, especially regarding water, sewage, and traffic impacts.

4. Economic and Social Benefits

The proposed development could:

- Boost local economy by creating jobs and attracting businesses.
- Enhance service delivery and public amenities for the community.
- Support housing needs identified in the IDP.

4.3.	The Spatial Development Framework of the local municipality.

The SDF indicates this Erf 878 as Agriculture Zone 1 that will have to be rezoned appropriately under SPLUMA to allow the proposed development. This application for rezoning and subdivision was submitted to Swartland Municipality for approval under different legislation. Please note that the Western Cape Provincial Department of Environmental Affairs and Development Planning allow the two applications to run together, but the planning approval may not be given before the Environmental Authorisation has not been approved.

4.4.	The Environmental Management Framework applicable to the area.

N/A

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

The definition of "Biodiversity" was expanded to include the "diversity" from a human perspective on issues such as heritage elements, urban planning, visual impression and sense of place. The alternatives were developed from an initial development proposal informed by initial site and surrounding conditions. This was presented as a pre application Basic Assessment Report wherein the initial layout alternative was informed by the site conditions, the issues, comments and impacts raised during previous rounds of the public participation process and the various specialist reports conducted. Due to the repeated long term agricultural practices on Erf 878 and the total destruction and removal of all-natural vegetation over a number of years, the biodiversity is depauperate and after lying fallow for 10 years, there are only pioneer plants associated with Renosterbos present. The immediately surrounding land use to Erf 878 is all severely transformed either to agriculture or urban development.

In addition to the above principles, aspects to rehabilitate and restore watercourse corridors and buffers have also bee considered in the evolution of the layout alternatives.

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

The application for the development of the site has been in process since 2020 and therefore the 2017 Western Cape Biodiversity Spatial Plan is applicable for the application. It has been confirmed that all assessments, studies and legal processes which were initiated prior to the 13 December 2024 can still be assessed under the 2017 WC BSP. The 2017 BSP shows the following for the site:

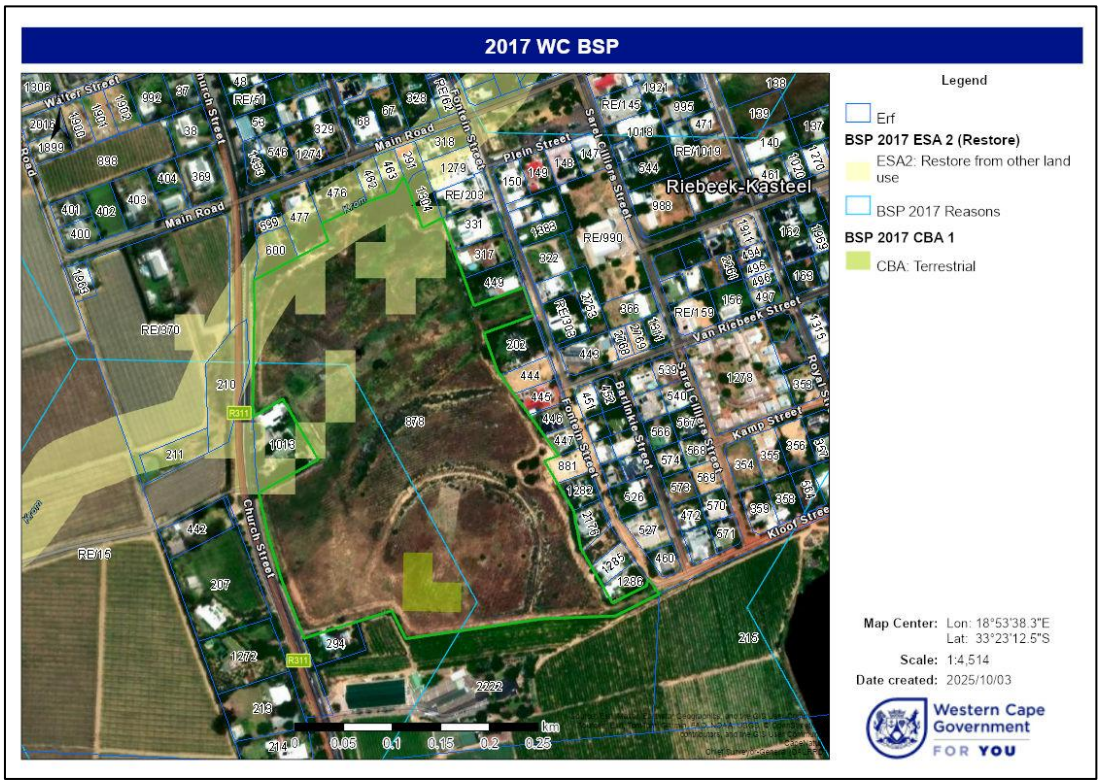


Figure 15. The Krom Rover corridor is highlighted as an Ecological Support Areas (Restore) (2017). With the following targets highlighted:

Category 1 - ESA2: Restore from other land use

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 - Restore and/or manage to minimize impact on ecological processes and ecological infrastructure functioning, especially soil and water-related services, and to allow for faunal movement.

The preferred Alternative 3 is inline with the above as it allocates open space to these identified areas:

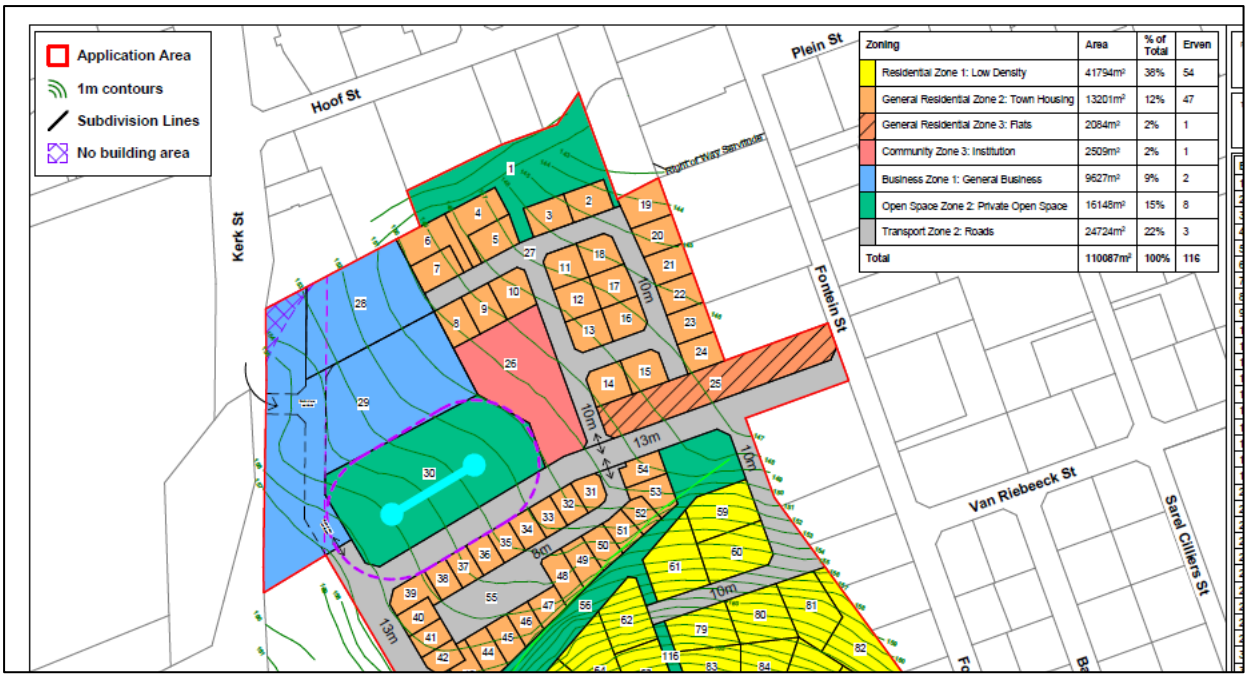


Figure 16. Extract from the preferred Alternative 3 showing the open space areas allocated to the Krom river corridor.

The site has been highly transformed and has been used for intensive agriculture previously.

Figure 17. 2013 Aerial photograph showing the agricultural activities on the site

Figure 18. 2015 Aerial photograph showing the agricultural activities on the site

The botanical assessment noted the following:

The proposed development will result in the transformation of less than 12 ha of transformed natural veld. However, it will impact on a small identified as a CBA (but which is already transformed) and an ESA (the disturbed Krom River ecosystem).

From a biodiversity / botanical perspective the only remaining features of significance on the site is considered the degraded Krom River corridor (which can benefit from some protection) and the presence of a few *Olea europaea* (wild olive) trees in between the old fruit trees.

The botanical report concluded that the impacts, without mitigation, is expected to be **Medium-Low**, mainly as a result of the potential impact on the Krom River, CBA and ESA's, but can be reduced to **Very-Low** through simple and very viable mitigation options.
With the correct mitigation it is unlikely that the development will contribute significantly to any of the following:

- → Significant loss of vegetation type and associated habitat
- → Loss of ecological processes (e.g. migration patterns, pollinators, river function etc.) due to construction and operational activities
- → Loss of local biodiversity and threatened plant species
- → Loss of ecosystem connectivity.

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.**

This is a draft BAR and the screening report submitted with the application form is the same as that included in **Appendix I**. It has been revised with the additional specialist input and evolution of the layout alternatives.

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

The proposed development is located on an Erf that is vacant and carries a zoning of Agriculture 1. The Swartland SDF indicates that Erf 878 is located within the urban edge proposed for residential development in Riebeek Kasteel. The site is strategically placed between main access roads within the built-up area and this, combined with its transformed nature, presents as the ideal place with infill development which addressed the need for both retail and residential needs.

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

The Erf 878 is the only portion of developable land located at the western end within the urban edge of Riebeek Kasteel. The location of the erf is such that it can easily be serviced by the Swartland Municipality. There is also a very large demand for residential opportunities in Riebeek Kasteel that far outstrips availability. This was confirmed during the feasibility study conducted by the applicant before embarking on the proposed 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 E**).

The necessary existing services capacities are available. See municipal confirmation Letter attached under **Appendix E.**

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

According to the Spatial Development Framework, 2019 as well as the draft 2023 Spatial Development Framework, Riebeek-Kasteel offers unique opportunities for the future expansion of the tourism sector and the residential component as a result of its unique sense of place and scenic natural landscape and resources.

OPPORTUNITIES

When taking into account all the relevant policy plans, which are also highlighted in the draft 2023 SDF, it is evident that the location and characteristics of the application area present excellent opportunities for the proposed development. The opportunities of the application area are as follows:

- located within the urban edge,
- borders on the CBD,
- offers beautiful views due to location and topography
- identified in the Spatial Development Framework, 2019, as well as the draft 2023 SDF as earmarked for residential development
- densification is proposed by the Spatial Development Framework, 2019 as well as the draft 2023 SDF
- business development, mixed use and higher residential densities are encouraged by the Spatial Development Framework, 2019 as well as 2023 SDF, along activity streets
- location adjacent to two activity streets namely Church Street (R311) and Main Street
- availability of infrastructure
- the adjacent Main and Church street crossing has recently been upgraded to ensure higher levels of safety on the roads
- the existing fountain and stream which is to be incorporated to provide a memorable historical focal point/landmark and to contribute to a unique sense of place.

The aim is to ensure that the proposal preserves the historic character and heritage of the town, while adapting to changing trends in housing and lifestyle needs, urban growth and town planning guidelines to ensure the long-term sustainability of Riebeek-Kasteel. The proposed residential township has the potential to provide for the following land-use components:

- low density single residential dwellings
- town housing in retirement village
- duplex town-housing
- apartments in retirement village
- apartments
- frail-care facility
- shops
- public parks
- private open pace for stormwater servitude
- roads

DESIRABILITY OF THE PROPOSAL

Growth Stimulus

The primary factor, stimulating growth in the Swartland, is most likely the area's favourable distance from the Cape Town metropole and the number of tourist attractions in the area. Similar to growth patterns of towns on the outskirts of other cities world-wide, the benefits include a lifestyle alternative to city life, lower cost structure and good municipal services whilst still having good access to markets in the metropole.

A further factor which has recently developed and which may contribute to future growth in the Swartland, is the global Covid-19 pandemic which may drive some people away from higher density city living to lower density rural living, where the infection rate may be lower. A further stimulus related to the global Covid-19 pandemic in South Africa was the expansion of effective communication links that made physical meeting sessions redundant. Nowadays a large number of the workforce can choose from where they want to work and this has made small rural towns very attractive as a base from which to operate.

As a result of the increasing popularity of Riebeek-Kasteel as a residential destination for retirees and various persons working in Cape Town and the surrounding towns, the need for residential developments in Riebeeck-Kasteel, has increased.

Policy & Legislation

The proposal is consistent with the following land-use management policies and legislation:

- Integrated Urban Development Framework, 2016 of which the purpose is to achieve integrated sustainable human settlements
- Efficient land governance and management
- Inclusive economic development
- West Coast District Municipality IDP, 2017 of which the purpose is to pursue economic growth and the facilitation of job opportunities and to promote the social well–being of residents, communities and targeted social groups in the district, namely the elderly
- Swartland Municipality IDP revised 2018 of which the purpose is to ensure healthy lives and promote well-being for all at all ages.
- Swartland Municipality SDF revised 2019 of which the aim is to enhance sustainable, liveable urban environments.

Socio-economic impact

The proposal is foreseen to create new opportunities and to add vibrancy to the town by offering a wider variety of residential uses and providing access to housing opportunities for different segments of the market in terms of age, needs and financial capacity.

Furthermore, the proposal is foreseen to increase thresholds of existing businesses and tourist facilities and offer new employment and business opportunities to expand the town and surrounds further and to promote and ensure its long-term sustainability.

The proposal also offers businesses and residents the opportunity of a lower cost structure and good municipal services whilst still having good access to markets and employment opportunities in the metropole.

Compatibility

The proposal presents a mixed-use development, which integrates residential, business, social and community facilities within a single development. The business component is mostly along or close to the R311 Church Street activity corridor, which thus adheres to the SDF, 2019 and draft 2023 and applies the planning and financial principle of locating business facilities along activity streets and corridors to increase the accessibility thereto and visibility thereof, thus increasing the potential number of visitors.

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**.

The Public Participation Process has been conducted in terms of the Environmental Impact Assessment (EIA) regulations as promulgated in the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) (as amended) and the 2014 NEMA EIA Regulations promulgated in Government Gazette No. 38282 and Government Notice R983, R984 and R985 on 4 December 2014 (as amended) as outlined in Section 41(2) of these Regulations.

There have been various rounds of pre-application public participation conducted to date. These were undertaken by the previous Environmental Assessment Practitioner (EAP) on the project, Charel Bruwer of Enviro Africa, and are outlined in this report. Lornay Environmental Consulting took over the project during the In-Process Phase in January 2025. The pre-application and in-process public participation are summarised herein.

Al registered interested and affected parties who were identified in the previous rounds of pre-application public participation remain registered I&AP'S and have been and will continue to be notified of all public participation and decisions going forward.

Three rounds of pre-application public participation were conducted by Charel Bruwer of Enviro Africa. Please note that the information below relating to the three rounds of out of process public participation, was supplied by the previous EAP. The three round were conducted at the following times:

a. 2020 Public participation: 25 March 2020 to 26 May 2020 (60 days)
b. 2021 Public participation: 16 March 2021 to 22 April 2021 (30 days)
c. 2024 Public participation: 15 March 2024 to 16 April 2024 (30 days)

The circulation of this, the Draft Pre-Application Basic Assessment Report, forms part of the first round of public in-process public participation and builds on all public participation conducted previously for the proposed development.

The Draft In-Process BAR will be circulated to all Organs of State and registered Interested and Affected Parties for a 30 day commenting period in line with Regulation 41(2) of the NEMA (1008) (Act No. 107 of 1998).

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

- Heritage Western Cape – comment pending as part of the HIA submission
- Cape Nature
- Department of Water and Sanitation (Warren Dreyer, Derril Daniels, Nelisa Ndobeni)
- Dept of Agriculture (Elsenburg)
- DEA&DP: Pollution Management
- DEA&DP: Waste Management
- DEA&DP: Biodiversity (comments no longer essential due to change in application scope and removal of fuel station)
- DEA&DP: Development Management (Region 1)
- Swartland Municipality
- West Coast District Municipality

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.

Pending

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.

Summary provided by Charel Bruwer of Enviro Africa:

An initial development layout was designed by the Town Planner and the (then) EAP. This initial Alternative A1 (now Alternative 1) was made available to potential Interested and Affected Parties (I&APs), relevant state departments, organs of state and community organisations that may have jurisdiction in the proposed development, meeting all the requirements as stipulated under NEMA 2014 as amended, for public comment. From the comments received it soon became evident that participants were, amongst other, concerned about the wedding venue on top of the hillock and the visual impact that it would have from the surrounding topography of Riebeek Kasteel. Concern was also expressed in the comments received about the perceived alteration of the character and sense of place of Riebeek Kasteel. Please note that due to the Covid-19 pandemic, the public participation process was modified as determined by DEA&DP at the time to provide access to information by all potential I&APs. Recognising the concerns raised by the participants in the first round of the public participation process, some specialist input studies were commissioned

e.g. botanical and biodiversity study, archaeological study of the site, an architectural design study as well as statement on visual impact to further inform a modified design layout presented as Alternative A2 (now known as Alternative 2).

The major difference between Alternative A1 and A2 (Alternative 1 and 2) lies in the removal of the wedding venue that was originally included in Alternative A1 (Alternative 1) as a visual feature and replacing it with ~25 single storey residential erven on top of the hillock. Another modification was creating a visual corridor from the entrance along Church Street from the south across the middle of Erf878 to the old church located on the ridge to the north-west.

Taking cognisance of the Heritage Western Cape response, as a commenting authority on the submitted NID, that a heritage study, inclusive of a visual assessment must be submitted with the final BAR, extensive discussions and inputs were obtained from a heritage practitioner, a visual impact specialist, an architectural design specialist, urban planner, infrastructure design engineers, traffic and road design specialist and the proponent's economic specialists.

Based on the information emanating from these discussions with this array of specialists, the layout was modified in consultation with the specialists and town planning team to that described under this preferred Alternative 3.

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 x**	NO
1.2.	Provide the name and or company who conducted the specialist study.		

R H Bradshaw & Associates CC Consulting Engineering Geologists – See Appendix G2

A Freshwater Impact Assessment was also undertaken in February 2025 by Kim van Zyl of Delta Ecology – See **Appendix G8.** The findings of the report are summarised as follows:

According to the national web-based environmental screening tool report generated for the proposed site, the Combined Aquatic Biodiversity Theme Sensitivity is classified as "Very High" (DFFE, 2024). The reason given is the location of the site within the Boland Strategic Water Source Area (SWSA) Surface Water. Furthermore, a fountain is known to be located on the site, and desktop resources indicate that a portion of the Krom River runs along the northern boundary.

Delta Ecology was contracted to undertake an aquatic biodiversity impact assessment of the proposed development site. The aim of this assessment is to (1) determine whether the mapped watercourses are present on the site, and if so, determine the current ecological state and ecological importance / sensitivity of the watercourses present, (2) to assess the potential impact of the proposed development on the mapped and confirmed watercourses and (3) to provide recommendations for impact mitigation.

Following the aquatic biodiversity assessment of the proposed site on the 20th of February 2025, the Krom River was confirmed to intersect the northern boundary of the proposed development site. In addition, two seep wetland systems were identified onsite, both of which are sustained by groundwater emergence in the form of springs. Seep wetland 1 historically would have extended to the east, downslope of the site, but the development of roads and residential areas has resulted in canalisation of this flow.

Several patches of artificial seepage dominated by *Pennisetum clandestinum* (kikuyu grass) were observed, primarily along the western boundary. The artificial nature and negligible ecological importance / sensitivity of these features resulted in their exclusion from the assessment.

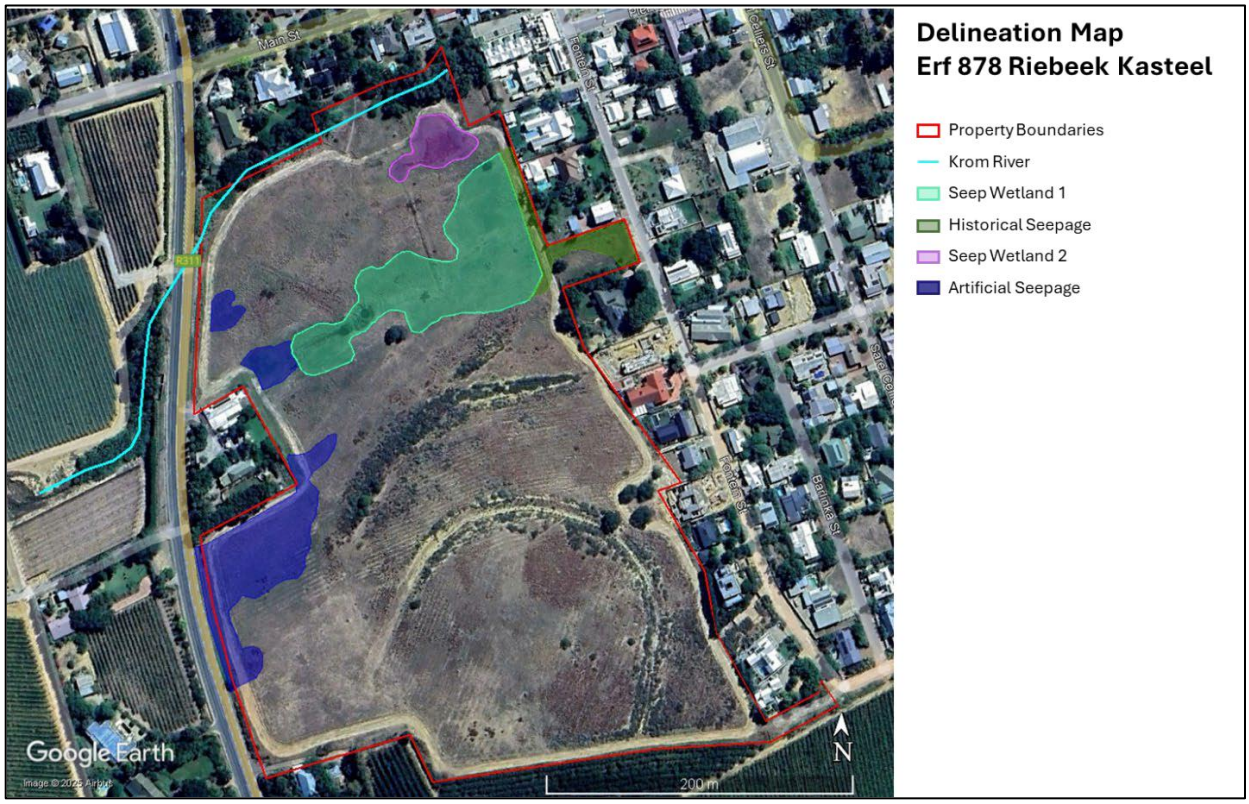


Figure 19a. Water course delineation map provided by Freshwater specialist

Given the confirmed presence of onsite watercourses which are likely to be impacted by the proposed development, the site was determined to be of "Very High" aquatic sensitivity. If the specialist determines that the Aquatic Biodiversity

sensitivity of the site is "Very High", the GN320 of 2020 requires that a full aquatic biodiversity impact assessment must be submitted as set out by the National Environmental Management Act (NEMA) (Act No. 107 of 1998) Regulations of 2020 (as amended) (GN R. 320 of 2020).

In this impact assessment, the delineated watercourses were assessed using current best practice assessment methodologies to determine the Present Ecological State (PES), Index of Habitat Integrity (IHI), Ecological Importance and Sensitivity (EIS), the contribution to Wetland Ecosystem Services (WES), and Recommended Ecological Category (REC) metrics.

Three alternative layouts were considered for the proposed development on the site. Aquatic biodiversity impacts associated with the development were identified and assessed using both an impact assessment methodology compliant with NEMA requirements and the Risk Assessment Matrix (RAM) prescribed by GN4167 of 2023. The seven potential aquatic impacts were assessed first without, and then with, application of mitigation measures, for the three proposed Alternatives.

Six out of seven of the post-mitigation scores fell within the within the "Low" impact categories. Wetland loss received the highest impact significance score, which fell within the 'Medium' category. Ordinarily, wetland loss would fall within the 'high' category, but the limited area of wetland loss (+- 1 Ha) and the degraded nature of the wetland areas to be lost, has reduced the impact significance.

Although it is unknown whether the development area would be further developed in future, it is assumed that the site would remain as is. The No-Go option would result in the continuation of impact to the watercourses due to onsite and adjacent land uses – and would therefore still result in negative impact to the delineated watercourses.

The Moderate risk rating confirms that a Water Use Licence will be required for this project due to the encroachment of the development into the onsite seep wetland areas.

The key recommendations therefore are:

- → The loss of the seriously degraded Seep Wetland 2, along with the loss of portions of Seep Wetland 1, should be compensated for by rehabilitating the Remnant Seep Wetland 1.
- → No untreated stormwater should enter the Remnant Seep Wetland 1 or "Offset" wetland area
- → Avoid encroachment into the remnant Seep Wetland 1 and the Krom River during construction and operational phases. These two areas should be set aside as a No Go for construction and operational phases.
- → A 20 m buffer area should be implemented around the remnant Seep Wetland 1; and a 10 m buffer around the Krom River (aboveground). The portions of the buffer areas that are located outside of the demarcated construction footprint should be designated as a No-Go area.
- → Tie into mainline sewage if possible or use fully contained conservancy tanks serviced by truck. No sewage treatment, irrigation or soak-aways should be contemplated.
- → Allowance must be made for stormwater to be treated in a vegetated detention pond and/or a substantial vegetated swale before release into the Krom River or Remnant Seep Wetland 1.
- → Municipal water supply should be used if possible
- → Alternative 1 and 2 both included a service station within proximity to Seep 1, while Alternative 1 also included a wedding venue on top of the hillock on the site. Alternative 3, which excludes the fuel station located close to Seep 1 is preferred from an aquatic perspective.

It is therefore the opinion of the specialist that the proposed development can be approved subject to implementation of the mitigation measures listed in this report.

1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.

See comment from Freshwater specialist above.

There was no aquifer that was identified on site but 16 test pits were dug, spaced over Erf 878 to determine the impact of the subsurface conditions on proposed infrastructure and to plan the engineering techniques to tailor the underground development infrastructure to the site conditions. Analysis of the test pit results indicated that there were only three pits where a perched water table was encountered (see Report on Geotechnical Conditions for Services in **Appendix G2**).

1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.

The test pits were dug to a depth of ~1.3 metres. The perched water tables in the three pits ranged between 0.5 to 0.8 metres from the surface. It must be noted that this test pit study was done during a very wet period in 2021 with surface water present on the northern portion of Erf 878. Engineering management techniques are well developed to deal with these sort of subsurface conditions.

2. Surface water

2.1.	Was a specialist study conducted?	**YES x**	NO
2.2.	Provide the name and/or company who conducted the specialist study.		

The previous EAP on the project, Charel Bruwer of Enviro Africa, provided the initial information relating to possible water resources on site. The then EAP, carries professional registration under the South African Council for Natural Scientific Professions as a Professional Environmental Scientist since 1983 and was employed, amongst other, as an applied limnologist for 22 years by Dept of Water Affairs and thereafter for 25 years as a private applied limnologist, conducted a water resources study of Erf 878 and immediate surrounds.

In addition to the above, Kim van Zyl from Delta Ecology, was appointed in February 2025, to delineate the wetlands and water resources on the site. Her findings included the following (See Section 1.2 above):

Figure 19b. Wetlands delineation for the site

The Freshwater specialist confirmed that the site is degraded. Historical imagery shows wetness indicators that seems to shift in various places across the site over time. This can be attributed to agricultural disturbances, irrigation, canalization as well as possible groundwater / seepage shifts. The majority of the systems which can be rehabilitated, are already located in open space areas.

2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.

There is a drainage channel on the northern end of the erf that drains stormwater runoff from the upslope agricultural fields established on the lower slopes of the mountains to the west of Erf 878. From this upstream area a seasonal "fountain" is also fed from the said slope and this fountain is located in the middle of the property. Development on these areas as well as a 32-metre buffer zone around the "fountain have been avoided and the "fountain" incorporated as a No-Go feature in the preferred development proposal. The "fountain" has no flow in summer. All water that drains from and across Erf 878 is transported by small stormwater channels located on the northern end of Erf 878 through a series of agricultural irrigation farm dams, via narrow drainage channels between the extensively developed surrounding agriculture to connect ultimately with the Berg River.

3. Coastal Environment

3.1.	Was a specialist study conducted?	YES	**NO x**
3.2.	Provide the name and/or company who conducted the specialist study.		
The site is located ~59 kilometres from the nearest coast.			
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 x**	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		
PB Consult Environmental Management Services.			
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.		

Available vegetation maps for the site, the National Freshwater Ecosystem Protection Areas designation for the site, on site vegetation and aquatic features and assessments were done. The impact of the surrounding developments on the site were conducted and the preferred development alternative designed and positioned on the erf footprint. A specialist botanical and biodiversity study and the history of land-use on site over the years have indicated that there were no natural conservation-worthy elements left on Erf 878 because of the long-term anthropogenic alteration impact on the site. Avoidance of the impact of the development on the fountain was ensured by implementing the 32 metres no-development zone around the fountain. The Title Deed for the site stipulates that the general public must have access to the fountain. There were initially 25 springboks on the site, but their numbers have been diminished to about 11 by the impact of lynx, according to local information.

The site at present is covered in grasses and pioneer vegetation (refer to **Photo 1** and **Photo 2**). According to the 2018 National Land Cover map , almost the whole of the property has been used to cultivate commercial annual (dry land) crops (w which were confirmed during the site visit). Historic Google images show that the site had already been cultivated before 2005 (the 2005 images looking remarkably similar than those of today). However, the land cover map also showed potential areas which may still support low shrubland and dense forest or trees (supported by recent Google images of the site). Unfortunately, the site visit shows that these patches only support a few hardy shrubs that had re-established on areas previously disturbed. Once the site is developed for residential purposes the establishment of houses and gardens with the typical development of gardens containing all sorts of typical garden plants and flowers, with irrigated areas, the diverse spread of typical garden birds will find the habitat suitable in which to proliferate.

As the remaining springboks will not be able to remain on the property due to the development of roads and perimeter fencing, they will be moved to a nearby farm habitat that is better suited to their preferred habitat requirements.

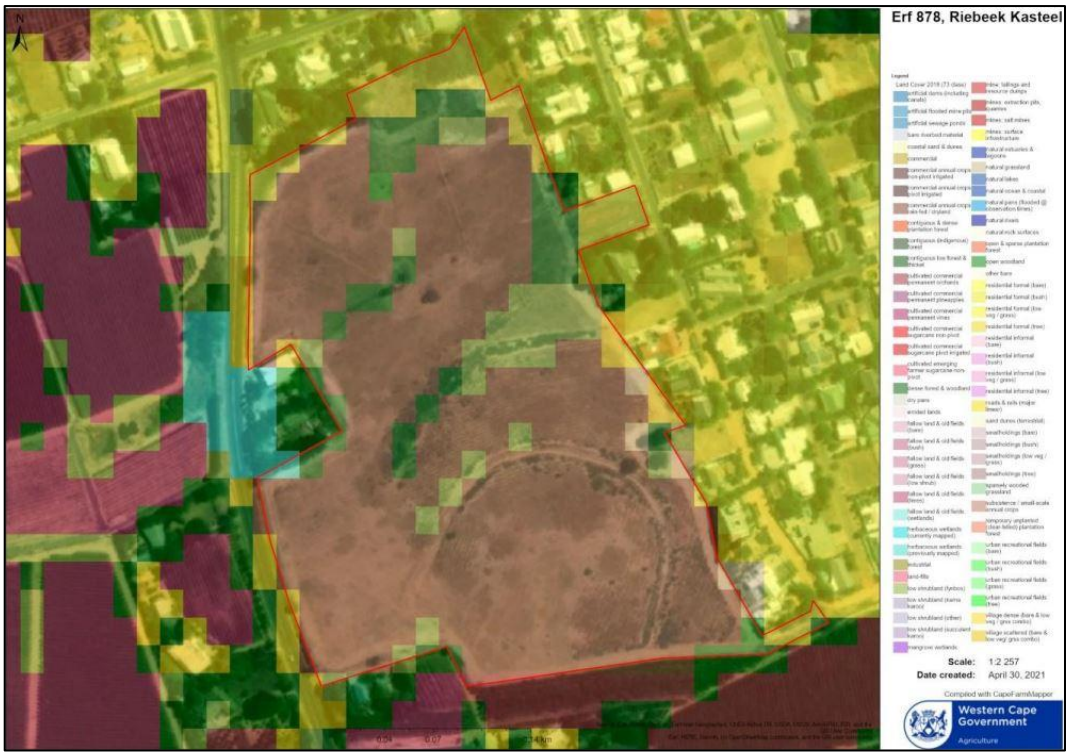


Figure 20. The 2018 DEA Land Cover map (73-class) showing the property in red.

Photo 1: Looking from north to south over the site, with old agricultural land in the foreground and the small hill in the background. Note the transformed status of the bottom part of the site.

Photo 2: A view of the southwestern corner of the property, looking from northeast (the foot of the small hill) to south-west. The old agricultural land with its grassy cover remains apparent.

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 possibility of achieving the objectives were assessed, based on the site elements and the design and positioning of the proposed development elements. There are no biodiversity corridors or linkages emanating from Erf 878 apart from the stormwater drainage channel that is about 5 metres wide at most, on the northern side of the property that spills into a storm water retention dam. The specialist highlighted that the original riparian vegetation had been compromised as a result of being within the urban edge. This drainage channel serves as a water runoff conduit for the higher-lying farming areas, as well as the surface runoff from the Riebeek Kasteel area. There are a number of sequential farm storage water bodies In the drainage channel running from Erf 878 from which farmers draw water for irrigation or discharge agricultural runoff into. At present, the river is almost overgrown with *Phragmites australis*, which had replaced the expected riparian zone. Only the occasional *Searsia* shrub was observed, while other ornamental plants like Oak trees and *Bougainvillea* plants were also observed within the old riparian corridor.

Figure 21: Critical Biodiversity Areas Map (2017) associated with the property (CapeFarmMapper).

Photo 3: The Krom River riparian vegetation to the right of picture. Note the dense stands of *Phragmites australis*.

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 preferred Alternative 3 development proposal provides protection of the "fountain" and runoff drainage channels on the property. It must be noted as is evident from the aerial photo in **Appendix A** that Erf 878 is an isolated, largely man-modified undeveloped piece of land, surrounded by highly developed and intensively farmed winelands as well as extensive residential development. From Erf 878 the stormwater drainage canal runs in a narrow channel through a series of agricultural water supply dams located in the drainage area to eventually drain into the Berg River at the times of high rainfall period.

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.

The proposed development is not located in a protected area.

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

There were initially 25 introduced springboks on Erf 878. These numbers have dwindled since 2019 to ~11. The areas immediately surrounding Erf 878 is devoid of any wild fauna, but domesticated pets are present. Lynx and other wild animals occurring naturally in the undeveloped mountain slopes to the immediate west of the site, as well as the drainage channels and may occasionally visit Erf 878, although this would be limited due to the nature of the site and presence of humans, domesticated pets and traffic.

5. Geographical Aspects

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

An important geographical aspect is the hillock located on the southern side of Erf 878. This hillock is not visible when one enters Riebeek Kasteel from the south along Kerkstraat due to fact that it is screened by The Barn restaurant complex located on the western border of the site. Driving along Kerkstraat in a southerly direction the hillock is becomes visible. The initial development design proposal made use of this elevated hillock to present a visual feature on top of the hill in the form of a small prominent wedding venue with a small steeple, surrounded by tall upright cypress trees. Comments received from Interested and Affected Parties (I&APs) indicated that this design would compete with the old church steeple located on the ridge ~600 metres to the northeast (see Photograph in **Appendix C**).

The development layout was then altered to include residential properties on the top of the hillock and remove the prominent wedding feature which was originally proposed for the Hill top. With this evolution of the layout, the impact of creating a new visual focal point which might detract from the church steeple, was avoided. Specialist input was used to inform the evolution of the alternatives from architectural, visual, heritage and urban design specialists and the number of erven on top of the hill were further reduced in number to allow for larger erven (see Layout alternatives in **Appendix B**). This represents a reduction of 12 erven that would have prime views over the rest of the development and Riebeek Kasteel. Despite the negative economic impact of this reduction in the number of erven, this layout was also considered to be more in line with the block-type layout of the rest of the historical residential layout of Riebeek Kasteel.

6. Heritage Resources

6.1.	Was a specialist study conducted?	**YES x**	NO
6.2.	Provide the name and/or company who conducted the specialist study.		

The specialist Heritage Resources Report was compiled by Ms Bridget O'Donahue (Heritage specialist), Mr Bruce Eitzen (Visual specialist) and Mr Jonathan Kaplan (Archaeologist).	
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.

The previous EAP, Charel Bruwer, Enviro Africa (Overberg) compiled and submitted a Notice of Intent to Develop (NID) to which HWC issued their response that indicated that a heritage assessment incorporating a visual assessment was required (see **Appendix E1**). Ms Bridget O'Donahue heritage specialist and Mr Bruce Eitzen of New World Associates were appointed to provide input into the heritage resources and visual sensitivities and sight lines that were important to the townscape character and sense of place of Riebeek Kasteel. The Heritage Impact Assessment has been submitted to Heritage Western Cape and the matter was tabled for discussion at HWC on the 10 March 2025.

The site is assessed with Grade IIIC significance due to the aesthetic and contextual values. It is located on the edge of the historic town, Riebeek Kasteel, abutting the entrance route, Church Street (R311). The site context has a medium degree of heritage resources in the immediate and broader site context, for example, the Dutch Reformed Church, Riebeek Kasteel Hotel, and many historic buildings. A Heritage Impact Assessment with a Visual Impact Assessment and an Archaeological Impact Assessment was undertaken in line with Heritage Western Cape requirements.

ARCHAEOLOGY

Remains - the very small number, isolated and disturbed context in which they were found means that the archaeological remains are graded as Not Conservation Worthy. No graves were encountered during the field assessment. The site has been transformed by historical agriculture, and the anticipated impact on tangible archaeological heritage resources is expected to be **very low.**

VISUAL IMPACT

Key Issues

1. The site lies on the R311 and is best seen from this major route.
2. The site is not easily seen from the town of Riebeek-Kasteel.
3. The site is split between a lower/northern portion and an upper/southern portion.
4. The historical grid of Riebeek-Kasteel remains intact.
5. Ridgelines constrain views of the site from the south and north.
6. Land use constrains views of the site from the east/town as does the grid.

Assessment

The revised layout (Preferred Alternative 3) and landscaping with careful consideration has created a scheme that blends well into the old village as it connects onto the prominent R311 cultural route. Sometimes the white / light-coloured walls seem a bit bright and could be toned down to a greener option that will blend in better with the lush vegetation and general leafiness of the landscape.

Mitigation Recommendations

1. Site Development Plan: Alternative 2 or similar is to be preferred over Alternative 3 and should be further explored to better fit the town grid and the site contours. (**NOTE** – Alternative 2 in the HIA refers to the new preferred Alternative 3 as described in this Basic Assessment Report and contains reduced development and larger erven on the hilltop and no fuel station or wedding venue. The retention of Riebeek Hill as significant Open Space should be considered.
2. Architecture: The design of buildings needs to incorporate traditional typologies and details that will make a better fit with this historic town and prevent a modernist intrusion on a heritage landscape.
3. Landscape Plan: A Landscape Plan has already been prepared and a reference to traditional tree and shrub species is desirable e.g. Oak and Gum trees.
4. Tree Plan: Trees both on-site and adjacent need to be mapped to ensure their conservation and incorporation into the development, including both traditional heritage tree species like oaks, gums and poplars, and indigenous/endemic species like Wild Olive.

5. Planting: There is no need to rigidly adhere to any “indigenous-only” kind of botanical extremism in an urban setting, especially one with strong historic connections.
6. Fencing: Is always a key feature of Architectural/Landscape detailing as it strongly affects the edge condition. Subtle, well-detailed, traditional fencing options and colours are preferred. ClearVu fencing is not desirable especially along the R311
7. Colouration: Colouration is a key tool to fitting any development into the landscape. There is a strong tendency for monotonous charcoal/grey estate colourations today and black fencing ClearVu fencing. These are not traditional colours in the Cape and detract from both contemporary and historic environments. A subtle combination of scheme colours needs to be developed that will avoid a mass approach to colouration with a high visual impact.
8. Maintenance: Landscape Maintenance, both private and public, including streetscapes, needs to be integrated into the scheme

URBAN DESIGN

The Urban Design analysis and Indicators report provides an evaluation of the Riebeek Kasteel’s structure, landscape and built environment with the primary goal of guiding the proposed development in a way that creates a development that is an extension of the town, that fits within the context and contributes positively to the character of Riebeek Kasteel. Through this analysis, several key informants and recommendations have been identified to ensure the new neighbourhood is fits for its context.

Key informants

1. Town Structure: The historical layout of Riebeek Kasteel developed around key landmarks like the Churches and Royal Hotel that remain foundation elements. The town structure integrates its scenic landscape. With vineyards and olive groves, emphasizing both cultural heritage and natural beauty. This integration is critical to maintaining Riebeek Kasteel appeal as both a residential and tourist hub.
2. Urban Grid and Layout: The town's grid pattern, which runs east-west with intersecting streets, is a primary ordering device. This grid informs the layout of new developments, despite topographic challenges. The grid must be respected and extended into new neighbourhoods through the use of trees and building arrangements where road networks may not be feasible.
3. Streetscape and Public Realm: The intimate streetscape, particularly in the town's historic centre, must be maintained. Building placement, verandas, and pedestrian-friendly environments contribute to the vibrant atmosphere of Riebeek Kasteel. The continuation of these design principles is vital in preserving the charm of the town while enhancing functionality for residents and visitors.
4. Sustainability and Natural Integration: The built environment is strategically nested within banks of trees, ensuring that buildings blend seamlessly into the landscape. This design not only reduces the visual impact of new structures but also contributes to a layered townscape that respects the natural environment. The town's green buffer along Church Street serves as both a visual and functional asset, and its expansion through additional landscaping is recommended.

The future development of Riebeek Kasteel must balance growth with preservation. By adhering to the identified layout informants, respecting the historical town grid, and maintaining a strong connection to the natural landscape, the town can evolve sustainably. The recommendations outlined in this report ensure that any new developments will not only complement the existing town but also enhance its charm, liveability, and appeal as both a creative and cultural hub.

HERITAGE ASSESSMENT

The assessment of the application is informed by a variety of criteria. Certain criteria are assessed as more important than others, as follows (in order of importance):

→ Low density of development on the elevated precinct;

- → Requirement to set aside land within the development for clusters and avenues of trees so that this denser development would in future have a well treed landscape, similar to the historic town;
- → Architectural language, scale and roofscapes to be informed by the historic buildings in the town;
- → Interfaces between the site and its boundaries, e.g. vegetation along Church Street, and on the southern boundaries.
- → Provision of parklands, and pedestrian routes that allows vistas towards the town's two landmark Churches.

Assessment Summary

The following summarise the heritage assessment:

- → The principle of development on the site is acceptable;
- → The layout is assessed as acceptable, and requires the 'support' of the architectural design parameters and the Landscape Plan;
- → The Architectural design parameters are supported;

HIA Recommendations

The HIA recommendations are as follows:

- → This HIA be endorsed by HWC as meeting the requirements contained in the Response to the NID;
- → The statement of significance and the heritage design indicators proposed in the report be accepted;
- → Approve the SDP
- → Approve the Architectural Design Parameters February 2025
- → Approve the Landscape Plan and require a detailed Landscape Plan and Guidelines to be submitted at the municipal stage of the application
- → Approve the Archaeological Impact Assessment that recommends:
- → No further archaeological mitigation is required.
- → No archaeological monitoring is required during construction phase excavations. If any buried human remains are uncovered during construction excavations, these must be immediately reported to the archaeologist (J Kaplan 082 3210172. Burials must not be disturbed until inspected by the archaeologist.
- → Approve the Visual Impact Assessment and the recommended mitigation measures to inform the detailed Landscape Plan and guidelines;
- → Approve the Urban Design report.

Evolution of alternatives

Three layout alternatives have been assessed in the process to date, being Alternative 1, Alternative 2 and Alternative 3 – preferred. These layouts have evolved in line with specialist and I&AP comments.

The original Alternative 1 (Former A1) had a wedding venue with small steeple church located on the top of the small hill / highest point on the site. The idea was to make this a visual focal point of the development and create a sense of place by planting cypress trees to soften, screen and add a church-like character to the proposed wedding venue. This alternative also contained a fuel service station on the north west section of the site.

However, comments received from interested and affected parties, found this to be out of character with the present ambiance of Riebeek Kasteel. Both the heritage investigation and visual impact assessment stressed that the proposed wedding venue on top of the properties high point would be in competition with, and detract from the existing visual and heritage character of the old church tower that was a heritage and visual focal point in the existing townscape of Riebeek Kasteel.

Taking the abovementioned comments into consideration, the original layout was amended as follows. The proposed wedding venue on top of the hill was removed and replaced by single residential housing. The sight line from Kerkstraat

across a portion of Erf 878 to the old church as focal point was cleared up so that the visual character of the church was maintained. In addition, an urban and architectural design protocol was also drawn up, taking the historical sense of place and character of Riebeek Kasteel into consideration (see Urban and Architectural Design in **Appendix G**).

Alternatives 1 and 2 then went through future reiterations based on heritage concerns, with Alternative 2 seeing the complete removal of the wedding venue on the hilltop and a redesign of the service station. However further comments during public participation resulted in the complete removal of the service station due to need and desirability concerns, and the reduction of the density of the development, particularly on the hill, in order to maintain the open space, feel of the hill top.

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.
See above.

8. Socio/Economic Aspects

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

The site is surrounded by intensively developed agricultural fields on the western and southern side of the town of Riebeek Kasteel. There is a narrow strip of residential development on the northern side of the Erf 878 and a wide section of residential development on the eastern boundary of Erf 878. Riebeek Kasteel thus appears as a residential "Island" amidst very extensive agricultural development surrounding Riebeek Kasteel (see Locality Map in **Appendix A1**. The agricultural community appears to be economically sustainable and provide jobs and housing for farmworkers. The town of Riebeek Kasteel consists of a mixture of old historical buildings (buildings older than 60 years by definition), as well as new modern buildings much younger than 60 years. This is pronounced along the southern end of Fontein Street that borders Erf 878 to the east.

The residential buildings belong to a mix of permanent and absentee residents, the latter who are financially robust and have invested in these rural escapes of temporary occupied houses as a getaway from the city hustle and bustle, in these quaint small towns in the Western Cape. A similar trend may be found in many small towns e.g. Greyton, Stanford, Pringle Bay, Onrus River, etc. This provides a clear trend in the need and desirability for such offerings.

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

The proposed development of Erf 878, subjected to the maintenance of the heritage and visual character of Riebeek Kasteel as is the case with the preferred Alternative 3 development template as modified by community and specialist study input, will thus provide a viable economic injection to the Swartland Municipality in the form of additional rates and taxes, addition of proposed infrastructure, the general business economy of Riebeek Kasteel and the provision of much sought after residential opportunities in a small town, away from the city hustle and bustle (see also Need and Desirability Report in **Appendix K** and Section E in this report above.

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

The proposed development of the vacant Erf 878, located within the urban edge, will provide a viable residential and business addition to the economy of Riebeek Kasteel. The preferred Alternative 3 development proposal without the wedding venue, much reduced number of single storey residential erven on top of the hillock and maintenance of sight lines and heritage character across the Erf 878 to the old church located to the northeast upon the ridge, as indicated by the participatory design process, development motivation, specialist reports relating to heritage, visual, urban design and architectural design parameters (see Urban Design and Architectural Reports in **Appendix G**) will be a welcome upliftment to the area, meeting the triple bottom line requirements of social, economic and environmental sustainability (see Town Planning Application in **Appendix K**).

The inclusion of a retirement component addresses the need for such offerings for the elderly, particularly in towns such as Riebeek Kasteel where the aging population does not have easy access to medical facilities.

The new opportunities which will come with the development and investment aspect of the proposal will support social and economic growth while protecting place identity and cultural integrity of the town.

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.

In the determination of the impact of the proposed development on people's health and well-being it was found that there will be temporary noise impacts during the construction period with the installation of services on Erf 878. Noise during the scattered construction period of residential and other dwellings over a long period of time will not be discernible from the ambient noise generated from surrounding roads and residential areas. The visual character of the Erf 878 will be altered extensively as it will change from a non-developed piece of open land to resemble the residential developments of the rest of Riebeek Kasteel. With the alterations in design layout and maintenance of sight lines from Kerkstraat to the historical church along a greenbelt established over Erf 878, the urban and architectural design criteria specified and the reversion to a much reduced number of single storey residential buildings from the initially proposed wedding venue on the hillock on Erf 878, both the visual character and sense of place of Riebeek Kasteel will be maintained (see Heritage Report in **Appendix G**).

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 subject property is the last remaining large erf located within the designated urban edge:

- → Various existing access points exist
- → The site contains no significant biophysical features and has been transformed through past agricultural use
- → The site borders on the historical CBD and therefore is uniquely placed
- → Offers picturesque views due to location and topography
- → Identified in the Spatial Development Framework, 2023 as earmarked for residential development.
- → Densification is proposed by the Spatial Development Framework, 2019 and 2023
- → Business development, mixed use and higher residential densities are encouraged by the Spatial Development Framework, 2019 and 2023, along activity streets
- → Location adjacent to two activity streets namely Church Street(R311) and Main Street
- → The adjacent Main and Church Street crossing has recently been upgraded to ensure higher levels of safety on the roads
- → The existing fountain and stream which is to be incorporated to provide a memorable historical focal point/ landmark and to contribute to a unique sense of place

→ The development proposal is aligned with all relevant planning and spatial development legislation

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

There were no other properties available in Riebeek Kasteel of an appropriate size that met the requirements offered by Erf 878 with regard to economy of scale that offered the development potential and economic feasibility that could be investigated.

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

A site selection matrix approach was not possible in this instance as the Erf 878 was the only property available that could meet the selection criteria imposed by the developer that were the following:

- → The site is located within the urban edge.
- → The site borders on the historical CBD;
- → Offers picturesque views due to location and topography;
- → Identified in the Spatial Development Framework, 2019 and 2023 as earmarked for residential development;
- → Densification is proposed by the Spatial Development Framework, 2019 and 2023;
- → Business development, mixed use and higher residential densities are encouraged by the Spatial Development Framework, 2019 and 2023 along activity streets;
- → Location adjacent to two activity streets namely Church Street(R311) and Main Street;
- → The adjacent Main and Church street crossing has already been upgraded to ensure higher levels of safety on the roads;
- → The existing fountain and stream which is to be incorporated to provide a memorable historical focal point/ landmark and to contribute to a unique sense of place;
- → The development proposal is aligned with all relevant planning and spatial development legislation.

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

The application process for the project has been running for almost 5 years now, with the first round of public participation on the Pre-Application Basic Assessment Report, commencing in 2020, just before the Covid lock down. There have been 2 Environmental Assessment Practitioners (EAPs) appointed on the project. The entire Pre-Application phase, which included 3 rounds of out of process public participation, were undertaken by the previous EAP, Charel Bruwer of Enviro Africa. Lornay Environmental Consulting was appointed in February 2025 to complete the application and take over the "In-Process" application requirements. This includes the completion of the "In-Process" Basic Assessment Report and final rounds of public participation.

An initial development layout was designed by the Town Planner in conjunction with the proponent and the initial EAP. This initial alternative was made available to potential Interested and Affected Parties (I&APs), relevant state departments, organs of state and community organisations that may have jurisdiction in the proposed development, meeting all the requirements as stipulated under NEMA EIA Regulations, 2014, as amended, for public comment. From the comments received it was evident that participants were, amongst other, concerned about the wedding venue on top of Riebeek Hill and the visual and cultural heritage impact that it would have from the surrounding topography of Riebeek Kasteel. Concern was also expressed in the comments received about the perceived alteration of the character and sense of place of Riebeek Kasteel. Recognising the concerns raised by the participants in the first round of the public participation process, some specialist input studies were commissioned e.g. botanical and biodiversity study, archaeological study of the site, an architectural design study as well as statement on visual impact to further inform a modified design layout presented as Alternative 2.

The major difference between Alternative 1 and 2 lies in the removal of the wedding venue that was originally included in Alternative 1 as a visual feature and replacing it with ~25 single storey residential erven on top of the Riebeek Hill. Another

modification was creating a visual corridor from the entrance along Church Street from the south across the middle of Erf 878 to the old church located on the ridge to the northeast.

Taking cognisance of the Heritage Western Cape response, as a commenting authority on the submitted NID, the full Heritage Impact Assessment, with a Visual Impact Assessment, Urban Design Report and Archaeological Impact Assessment, has now been undertaken and has informed the final Preferred Alternative 3.

The impacts associated with the installation of the civil engineering aspects are common to all three alternatives: Geographical impact, Ecological impact, Traffic impact and Noise impact. The only impacts where there were differences between the three alternatives A1, A2, and A3, were those relating to Heritage, Visual and Socio-economic**.** The essential differences between the three alternatives were the following:

Alternative 1

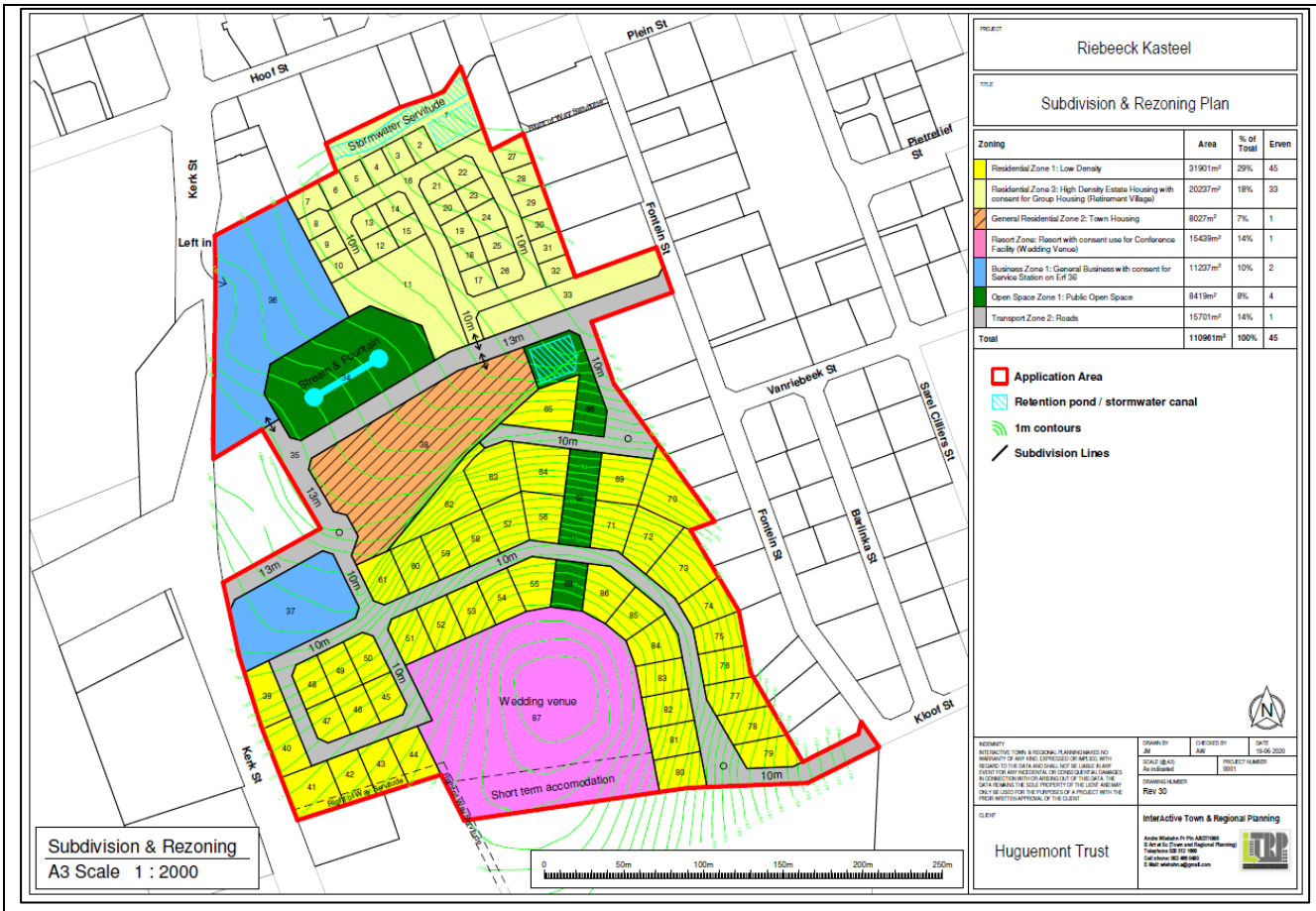
This alternative was designed as an initial development layout submitted in the form of a pre-BAR to initiate the process of public participation and solicit input on issues, comments and impacts from initially identified I&APs, ratepayers and environmental groups, as well as organs of state. This proposal included service station on Business Zone 1 as well as a wedding venue on top of the hillock on Erf 878 as a visual feature and underestimated the importance of the sight line across the property from Church Street as one enters Riebeek Kasteel. This alternative also failed to recognise and / or acknowledge the history of the town and the importance of the town church as a focal point. By including a second church steeple on the Riebeek Hill presented a threat to the existing point of focus in Riebeek Kasteel.

In a number of on-site tests that were run during these initial phases of the development concept, showed that when entering the town from Church street, the motorists foreign to the town focussed mainly on the roadway of Church Street as it is a steep downhill and that the church on the far hill was screened by The Barn before the vista suddenly opened up when passing Erf 878.

Driving from the north to the south down Church Street one is also confronted with a downhill slope that tends to maintain focus on the road ahead and there is no awareness of the church on the hill behind.

When on foot as a pedestrian entering the town on foot from the south, all became aware of the church on the far hill. This awareness was ascribed to the slow speed of approach and the ample time to take in the detail of the surrounding vistas.

With the above in mind, and the input from visual and heritage specialists, regarding the inappropriateness of the wedding venue and church steeple on Riebeek Hill resulted in the removal of this feature in the future layout alternatives. The venue was replaced with single residential erven in Alternative 2.



Zoning	Area	% of Total	Erven
Residential Zone 1: Low Density	31901m²	29%	45
Residential Zone 3: High Density Estate Housing with consent for Group Housing (Retirement Village)	20237m²	18%	33
General Residential Zone 2: Town Housing	8027m²	7%	1
Resort Zone: Resort with consent use for Conference Facility (Wedding Venue)	15439m²	14%	1
Business Zone 1: General Business with consent for Service Station on Erf 36	11237m²	10%	2
Open Space Zone 1: Public Open Space	8419m²	8%	4
Transport Zone 2: Roads	15701m²	14%	1
Total	**110961m²**	**100%**	**45**

Figure 22. Alternative 1 layout.

Alternative 2

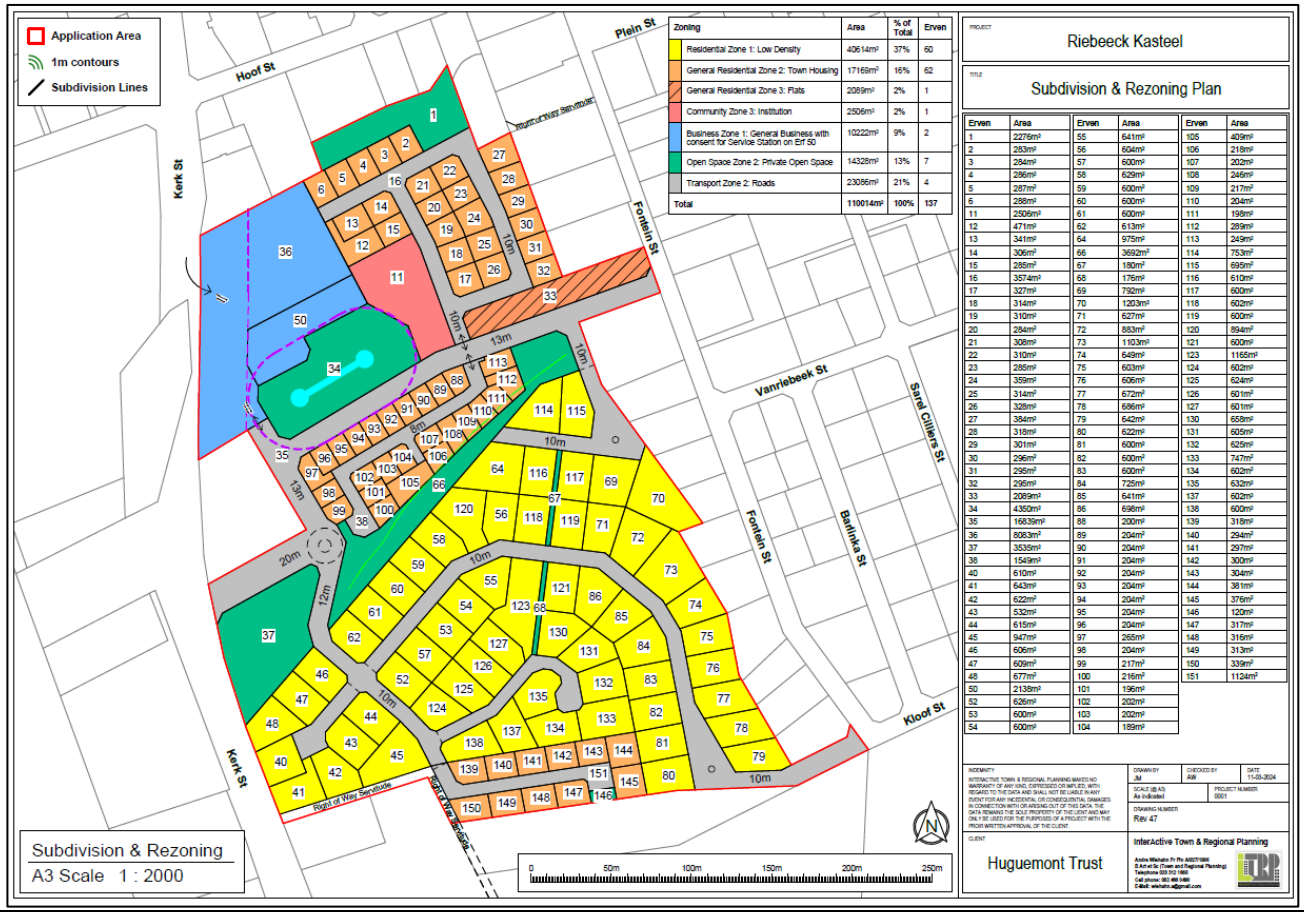
Alternative 2 evolved in response to the first round of public participation, as well as early input from the heritage, visual and design team. Specialist input to meet the Heritage Western Cape requirement, with specific reference to townscape analysis, visual impact assessment and heritage design indicators as well as an overall assessment of the impact on heritage resources, were not yet fully implemented in this alternative.

The removal of the proposed wedding venue and small church steeple was implemented in this alternative. The short term accommodation offering under resort zone, which was proposed adjacent to the venue has also been removed and

replaced with General Residential Zone 3 (apartments). This was replaced with approximately 25 single storey residential dwellings on top of Riebeek Hill, but still no consideration yet for the density of residential dwellings on top of Riebeek Hill and the grid-block type layout of the old residential areas of Riebeek Kasteel. The visual sight corridor from Church Street across the middle of Erf 878 to the old church steeple on the distant ridge to the northeast was opened, as per previous concerns. The economic impact with the increased number of residential dwellings were also more positive according to the proponent. This was because the economic benefit would be realised over a shorter period of time with the sale of the erven, than with the economic benefit of a wedding venue that would accrue over a longer period of time with rentals.

This alternative also saw changes in the layout of the business zone, specifically relating to the fuel station, where a right of way servitude was included alongside Kerk Street and the Business Zone was reduced in size.

However, in the meantime, discussions were held with people knowledgeable in the field of HIA and specialist studies were embarked upon as inputs to the heritage impact assessment as stipulated by Heritage Western Cape in their letter of 4 June 2021. The outcome of these discussions and specialist studies was that the design layout was once again changed to culminate in Alternative A3. In addition, erf 37 which was previously marked in Alternative 1 as a Business Zone is removed in Alternative 2 and marked as Open Space – this opened up the line-of-sight corridor required. in addition, for this line of sight, an open space erf (Erf 66) was added between the town houses and single residential dwellings on the hill.



Zoning	Area	% of Total	Erven
Residential Zone 1: Low Density	40614m²	37%	60
General Residential Zone 2: Town Housing	17169m²	16%	62
General Residential Zone 3: Flats	2089m²	2%	1
Community Zone 3: Institution	2506m²	2%	1
Business Zone 1: General Business with consent for Service Station on Erf 50	10222m²	9%	2
Open Space Zone 2: Private Open Space	14328m²	13%	7
Transport Zone 2: Roads	23086m²	21%	4
Total	**110014m²**	**100%**	**137**

Figure 23. Alternative 2

Alternative 3 - Preferred

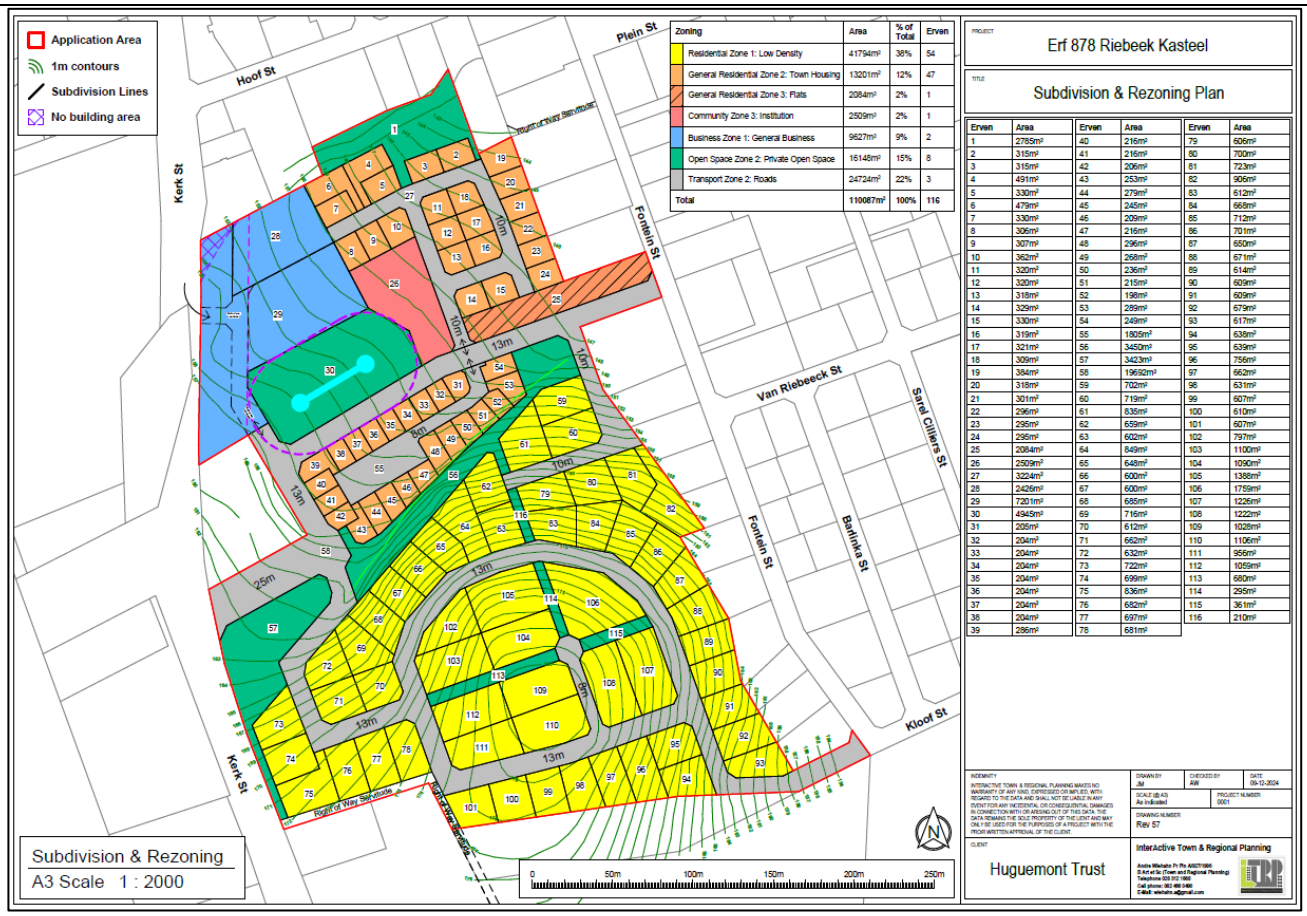
This layout was developed after additional specialist input, particularly as requested by Heritage Western Cape and as presented in the Heritage Impact Assessment, Visual Impact Assessment, Archaeological Impact Assessment and Urban Design Guideline. This is the current preferred layout alternative for the development proposal. Other additional specialist input which informed this layout included the Freshwater Impact Assessment.

The preferred Alternative 3 sees an inclusion of a grid-block layout as seen in the older part of the Riebeek Kasteel, being replicated as far as possible on Erf 878. Riebeek Hill topography did present practical limitations to this, due to the configuration of the landform and requirement that the stormwater and other underground services had to be placed in the road reserves.

In addition, Alternative 3 sees a significant reduction of the number of erven on top of Riebeek Hill from approximately 25 to approximately 11. The erven sizes have been increased from 600 - 750 m^2 to approximately 1000 - 1400 m^2 over the same area. This change aims to allows for a less dense alternative and encourages green spaces between homes.

Although this reduction in the number of erven and the increased difficulty in selling the larger erven at higher cost, the developer is in agreement to incorporate the outcomes of the specialist studies of visual, urban design and heritage into the preferred Alternative 3.

Another important change in Alternative 3 is the removal of the fuel station as well as the apartments that were proposed for the south end of the property, where these were replaced with low density single residential erven.



Zoning	Area	% of Total	Erven
Residential Zone 1: Low Density	41794m²	38%	54
General Residential Zone 2: Town Housing	13201m²	12%	47
General Residential Zone 3: Flats	2084m²	2%	1
Community Zone 3: Institution	2509m²	2%	1
Business Zone 1: General Business	9627m²	9%	2
Open Space Zone 2: Private Open Space	16148m²	15%	8
Transport Zone 2: Roads	24724m²	22%	3
Total	**110087m²**	**100%**	**116**

Figure 24. Alternative 3 – the preferred alternative

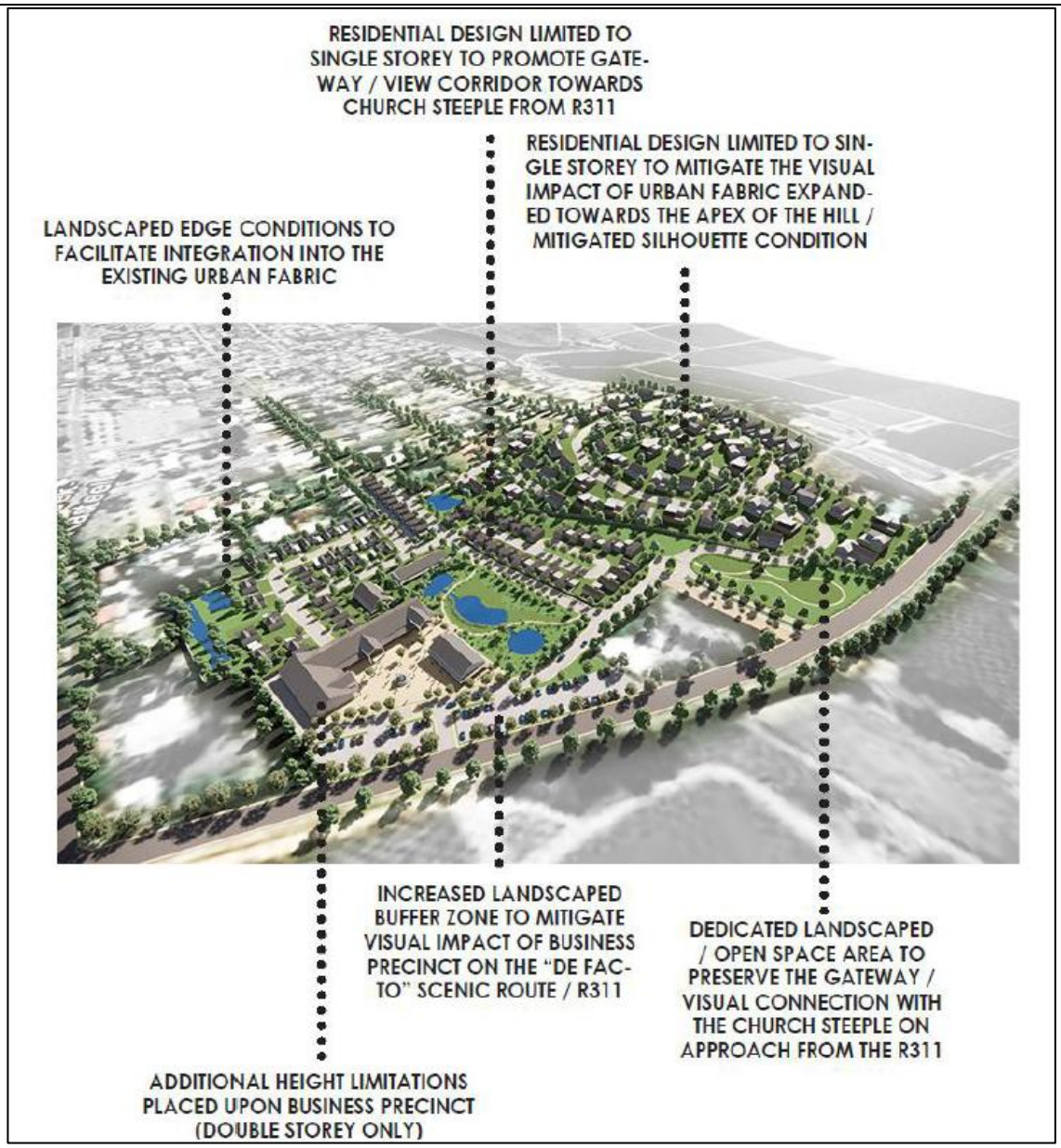


Figure 25. A depiction of how Alternative 3 addresses the heritage concerns of the proposal.

Figure 26. Landscape plan for the preferred alternative 3.

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

The developer investigated all the undeveloped properties available in Riebeek Kasteel that could meet the required size, cost, location and economic feasibility in the property investment that he wished to embark upon. Erf 878 was the only one that met the size criterium that was required for the proposed development. All the others were too small to present

economic feasibility as determined by the economists and financiers that he approached (see Vacant Land in Locality Map in **Appendix A**).

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

There were no appropriate property and site alternatives identified that could meet the proposed development requirements.

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

Provide a description of the preferred activity alternative.

Only layout alternatives are investigated with minor internal activity alternatives, as described above.

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.

There were no activity alternatives identified as this an application for a residential housing and associated business and infrastructure development, designed to conform with the applicable national, provincial, local regulations and Swartland municipal by-laws.

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.

Three layout alternatives and the No Development option (No Go) have been assessed today. Alternative 3 is the preferred layout:

ALTERNATIVE 3 (PREFERRED)

This layout has been refined based on inputs from various specialists, including archaeological, visual, heritage, freshwater and botanical assessments, as well as site-specific considerations such as topography, environmental sensitivities, and integration with the surrounding context. Input from Interested and Affected Parties (I&APs) and Organs of State during the various preceding rounds of public participation have also shaped this layout.

This layout includes the following broad land uses:

- → Retirement village
- → Single residential dwellings
- → Town housing
- → Retail (no fuel station)
- → Open spaces located at specific areas to incorporate water resources as well as line of site requirements
- → Internal roads

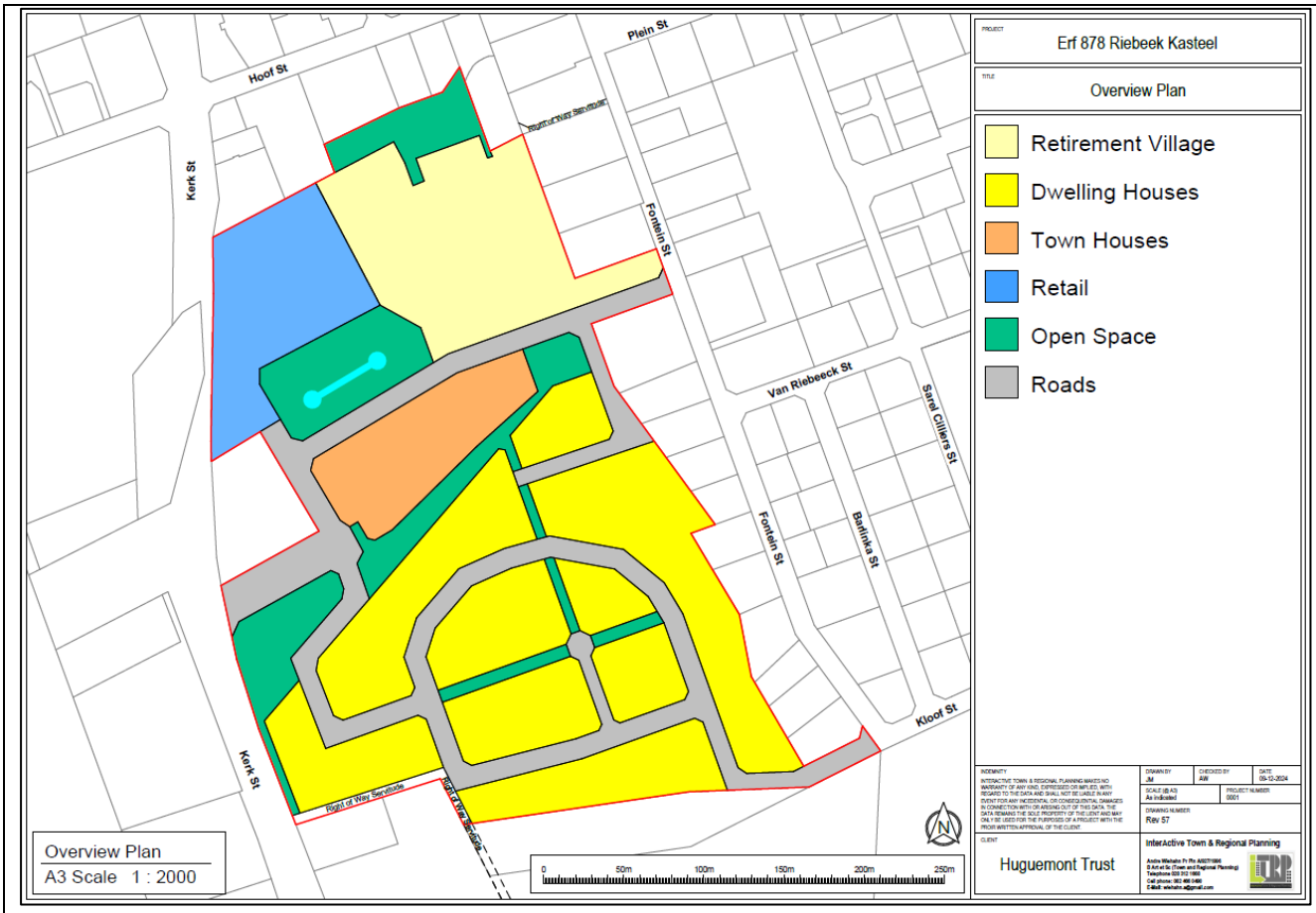


Figure 27. Block plan as per Alternative3, for the proposed development

Alternative 3 has evolved as follows in response to specialist and I&AP input, as follows

- → Including a grid lock type layout as seen in the older parts of Riebeek Kasteel
- → No wedding venue
- → No fuel station
- → Removal of apartments on the southern border
- → Reduction of the business zone and increase in open space offerings
- → Open spaces located to include line of site as per heritage requirements
- → Development on Riebeek Hill reduced in density with larger erven to allow for a more open and green development and encourage green spaces between homes.

The town planning application currently submitted for the development (subject to Environmental Authorisation) is therefore for the following:

- → 54 Residential Zone 1 (Low Density) erven (~600m^2 and ~1759m^2) located along the slopes and top of Riebeek Hill, covering a total extent of ~41794m^2 or 38% of the property.
- → 47 General Residential Zone 2 (Town Housing) erven (~198m^2 and ~491m^2) located on the northern flat section of Erf 878, covering a total extent of ~13201m^2 or 12% of the erf.
- → 1 General Residential Zone 3 (Flats) erf with an extent of ~2084m^2 or 2% of the erf.
- → 1 Community Zone 3 (Institution) erf with an extent of ~2509m^2 or 2% of the erf.
- → 2 Business Zone 1 (General Business) erven with a total extent of ~9627m2 or 9% of the erf.
- → Open Space Zone 2 (Private Open Space) erven with total extent of ~15938m^2 or 15% of the erf.
- → 3 Transport Zone 2 (Roads) erven with a total extent ~24724m^2 or 23% of the erf.

The associated infrastructure for Alternative 3 includes internal roads, retail shops, flats, public parks, stormwater drainage systems, sewage reticulation, potable water supply, waste removal, and power supply, all connected to existing Swartland Municipality systems with confirmed capacity.

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

Three layout alternatives and the no go options have been assessed in the NEMA process.

ALTERNATIVE 1

A mixed-use development is proposed, consisting of the following components with the following approximate extent values:

- → 45 Residential Zone1: Low Density - 31901m^2
- → 33 Residential Zone 3: High Density Estate Housing with Consent Use for Group Housing (Retirement Village) - 20237m^2
- → General Residential Zone 2: Town - 8027m^2
- → Resort ZoneL Resort Zone with Consent Use for Conference Facility (Wedding Venue)
- → Business Zone 1: General Business with Consent for Service Station on Erf 36 – 11237 m^2
- → Open Space Zone 1: Public Open Space – 8419 m^2
- → Transport Zone 2: Road's - 15701m^2

This alternative was developed as an initial proposal to kick off the impact assessment process for the proposed urban development of Erf 878. This proposal included a wedding venue with parking area on top of Riebeek Hill. The wedding venue consisted of a church with steeple and tall cypress trees to act as a visual emphasised feature on top of the hillock (Riebeek Hill) on Erf 878. This alternative also includes a fuel service station and was guided by limited public or specialist input.

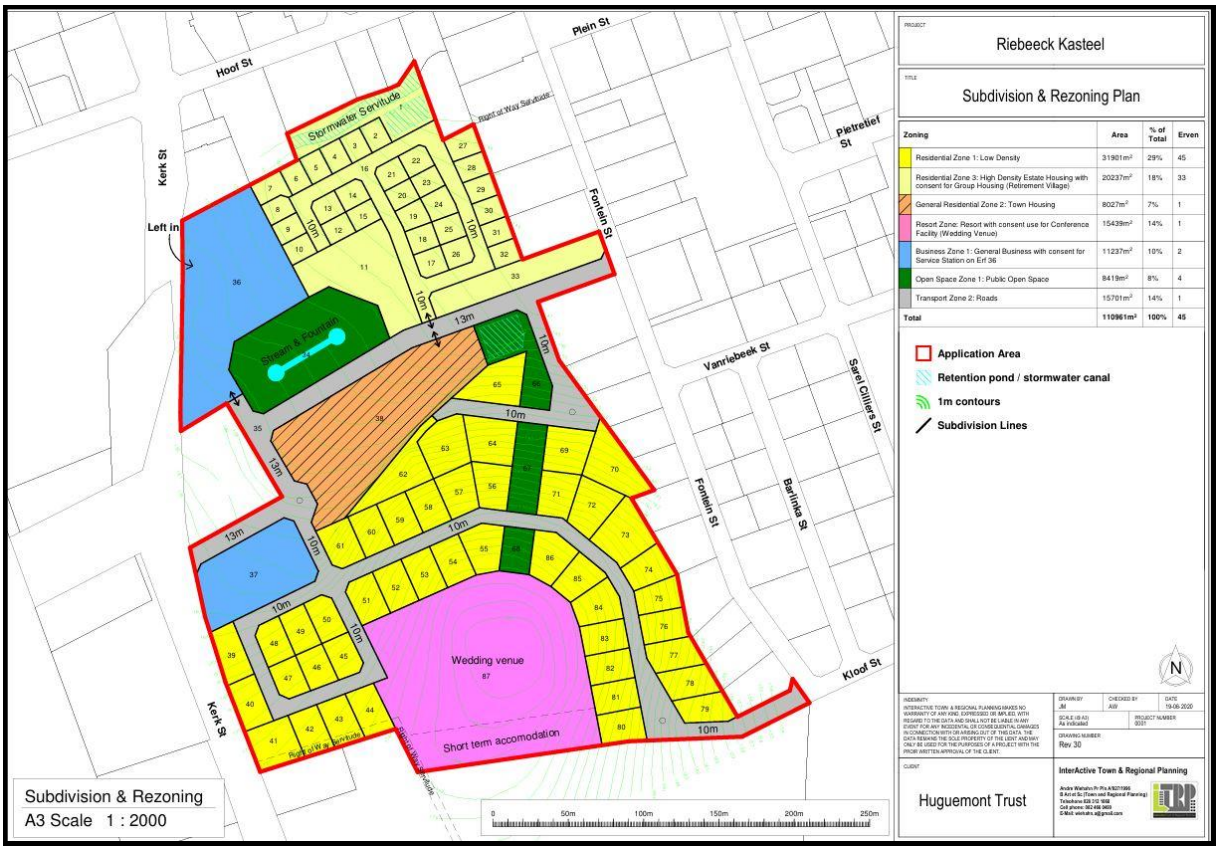


Figure 28. Alternative 1

ALTERNATIVE 2

Alternative 2 evolved in response to the first round of public participation, as well as early input from the heritage, visual and design team. Specialist input to meet the Heritage Western Cape requirement, with specific reference to townscape analysis, visual impact assessment and heritage design indicators as well as an overall assessment of the impact on heritage resources, were not yet fully implemented in this alternative.

Key changes in the layout include:

- → The removal of the proposed wedding venue and small church steeple on Riebeek Hill
- → The removal of the short-term accommodation offering under resort zone, which was proposed adjacent to the venue has also been removed and replaced with General Residential Zone 3 (apartments).
- → Addition of approximately 25 single storey residential dwellings on top of Riebeek Hill in place of the venue.
- → Inclusion of the visual sight corridor as an open space. from Church Street across the middle of Erf 878 to the old church steeple on the distant ridge to the northeast.
- → Changes in the layout of the business zone, specifically relating to the fuel station, where a right of way servitude was included alongside Kerk Street and the Business Zone was reduced in size.
- → Change of erf 37, previously a Business Zone, is removed in Alternative 2 and marked as Open Space – this opened up the line-of-sight corridor required.
- → An open space erf (Erf 66) was added between the town houses and single residential dwellings on the hill to further add to the line of site corridor

Specifically, Alternative 2 is broken down into the following specific offerings

- → Residential Zone 1: Low Density - 60 erven of approximately 40614m^2.
- → General Residential Zone 2: Town housing covering a total extent of 17169m^2
- → General Residential Zone 3: Flats of approximately 2089 m^2
- → Community Zone 3: Institution of 2506 m^2
- → Business Zone 1: 2 General Business with consent for service station, covering a total extent of 10222m^2.
- → Open space zone 2: 7 Private Open Spaces covering a total extent of 14328m^2.
- → Transport Zone 2, 4 erven with an extent of 23086m^2.

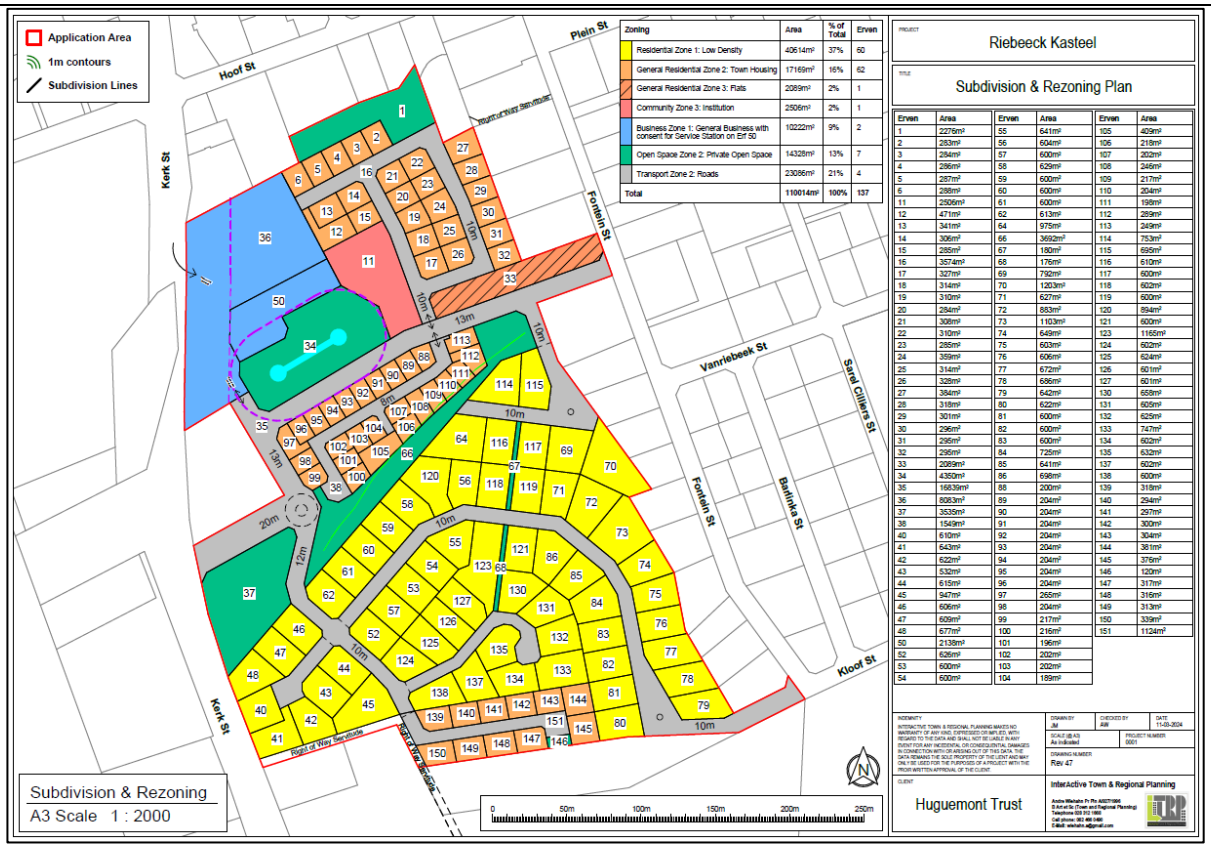


Figure 29. Alternative 2

ALTERNATIVE 3 (PREFERRED)

As described above, comprising specifically of:

- → 54 Residential Zone 1 (Low Density) erven (~600m^2 and ~1759m^2) located along the slopes and top of Riebeek Hill, covering a total extent of ~41794m^2 or 38% of the property .
- → 47 General Residential Zone 2 (Town Housing) erven (~198m^2 and ~491m^2) located on the northern flat section of Erf 878, covering a total extent of ~13201m^2 or 12% of the erf.
- → 1 General Residential Zone 3 (Flats) erf with an extent of ~2084m^2 or 2% of the erf.
- → 1 Community Zone 3 (Institution) erf with an extent of ~2509m^2 or 2% of the erf.
- → 2 Business Zone 1 (General Business) erven with a total extent of ~9627m2 or 9% of the erf.
- → Open Space Zone 2 (Private Open Space) erven with total extent of ~15938m^2 or 15% of the erf.
- → 3 Transport Zone 2 (Roads) erven with a total extent ~24724m^2 or 23% of the erf.

ALTERNATIVE 4: NO-GO

This alternative retains the status quo with no development considered for the site. The existing environmental conditions, remain as is.

Provide a motivation for the preferred design or layout alternative.

The selection of Alternative 3 as the preferred design or layout for the proposed mixed-use development on Erf 878 in Riebeek-Kasteel is driven by a combination of public feedback, specialist recommendations, and a commitment to balancing development objectives with the preservation of the area's unique character and environmental qualities. Initially, Alternative 1 was presented as the preliminary layout during the public participation process, featuring a wedding venue atop Riebeek Hill alongside other development components. However, comments received from stakeholders highlighted significant concerns, particularly regarding the visual impact of the wedding venue on the surrounding topography and its potential to alter the cherished sense of place and historic character of Riebeek-Kasteel. These

concerns were echoed in the review of Alternative A2, which retained the wedding venue, prompting a need for reassessment to address community sentiment and mitigate adverse impacts.

In response to these public concerns, a comprehensive approach was adopted, involving the commissioning of specialist studies from a heritage practitioner, a visual impact specialist, an urban designer, and an architectural design specialist. The findings from these studies provided critical insights that informed the evolution of the layout into Alternative A3. Notably, the Visual Impact Assessment (VIA) underscored the site's high visibility from the R311 and emphasized the importance of blending the development with the scenic and historic landscape, recommending the retention of open spaces and the use of traditional design elements. The heritage assessment concluded that the archaeological remains on-site were "Not Conservation Worthy" due to their degraded context, thus posing no significant constraint to development but reinforcing the need to respect the broader cultural setting. Meanwhile, the botanical specialist highlighted the compromised state of the Krom River's riparian zone, advocating for its protection and the removal of invasive species, which further influenced the design priorities.

Based on this specialist input and in consultation with the town planning team, Alternative 3 was developed as a refined layout that directly addresses the identified issues. A key modification was the removal of the wedding venue from the hilltop, a feature present in both Alternatives 1 and 2, and its replacement with single-storey residential housing. This change significantly reduces the visual prominence of the development from surrounding vantage points, aligning with the VIA's call for a design that integrates seamlessly with the landscape. The residential erven, ranging from 600 m² to 1,759 m², are strategically placed along the slopes and top of Riebeek Hill, covering 38% of the erf, and are interspersed with open spaces to maintain visual connectivity and soften the development's footprint. This adjustment not only mitigates the perceived threat to Riebeek-Kasteel's sense of place but also responds to public concerns about preserving the area's aesthetic and cultural integrity.

Furthermore, Alternative 3 incorporates additional enhancements that reinforce its suitability as the preferred option. The inclusion of 15,938 m² of Open Space Zone 2 (15% of the erf), particularly along the stormwater drainage line adjacent to the Krom River, supports ecological restoration by providing a protected buffer zone, as recommended by the botanical specialist. This open space facilitates the removal of invasive alien plants and enhances local biodiversity, while also contributing to stormwater management. The layout's reduction of the overall development density reflects a deliberate effort to minimize impacts. The mix of uses—comprising low-density residential, town housing, flats, institutional, and business zones, supported by integrated infrastructure—ensures a functional and sustainable community while maintaining compatibility with the existing urban fabric.

In conclusion, Alternative 3 is motivated by its responsiveness to stakeholder input and specialist guidance, effectively addressing the visual, cultural, and ecological concerns raised during the planning process. By eliminating the wedding venue, reducing the development's visual impact, preserving open spaces, and aligning with the historic and scenic character of Riebeek-Kasteel, this layout achieves a balanced outcome. It mitigates negative impacts, enhances positive contributions to the community, and ensures the development complements rather than competes with the area's unique identity, making it the most appropriate and well-supported choice for implementation.

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.

The preferred Alternative 3 offers several positive impacts, primarily centred on preserving the visual and cultural integrity of Riebeek-Kasteel. One significant benefit is the maintenance of the town's historic visual character, particularly the critical sight line from Church Street (along the R311) at the entrance to Riebeek Kasteel, across Erf 878, to the historical church situated approximately 500 meters away at an elevated position to the northeast. This was achieved by modifying the original layout to ensure the development does not obstruct this view but instead enhances it by creating a sight path that focuses the visual scape toward the church, a key heritage feature. Additionally, Alternative 3 aligns the proposed development elements with the existing block-type layout of Riebeek Kasteel, ensuring a seamless integration with the

town's urban fabric. Another positive adjustment is the reconfiguration of residential erven on Riebeek Hill, where the number was significantly reduced, with larger plot sizes, and restricted to single-storey construction across all residential components on Erf 878. This reduction minimizes the development's footprint and height, further safeguarding the visual landscape and complementing the low-rise character of the area.

In contrast, Alternatives 1 and 2 present notable negative impacts, particularly concerning visual heritage. Both layouts threaten the important sight line from Church Street to the historical church by introducing elements that disrupt this view. Specifically, Alternative 1's inclusion of a wedding venue atop Riebeek Hill was deemed unacceptable, as it would have created a competing visual focal point, detracting from the heritage significance of the church and altering the experience of entering Riebeek Kasteel. This obstruction would undermine the town's sense of place and historical continuity, a concern raised during public participation and validated by specialist studies. Alternative 2, while not detailed extensively here, similarly failed to address these visual concerns, maintaining elements that conflicted with the scenic and cultural environment, thus rendering it less favourable than Alternative 3.

A potential negative impact of Alternative 3, however, lies in its economic implications rather than direct environmental harm. The reduction of residential erven, while beneficial for visual and cultural preservation, results in a lower development yield, potentially affecting the project's economic viability or profitability. This decision was not made lightly but was informed by rigorous specialist assessments, including heritage impact, visual impact, urban design, architectural design, and municipal services studies. These studies collectively prioritized the long-term environmental and cultural benefits over maximizing development density, reflecting a trade-off between economic gain and sustainable integration with the surrounding context. Despite this economic downside, the advantages of Alternative 3—such as enhanced visual coherence, reduced landscape disruption, and alignment with ecological recommendations (e.g., open space along the Krom River)—position it as the most balanced and environmentally responsible choice among the alternatives.

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:

There were no technology alternatives that could be considered as this is an application for an urban development on the last vacant piece of land of the required size in private ownership located within the urban edge of Riebeek Kasteel.

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.

N/A

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

N/A

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

Provide a description of the preferred operational alternative.

There were no operational alternatives that could be considered as this is an application for an urban development on the last appropriate sizeable vacant piece of land located within the urban edge on the western side of Riebeek Kasteel. The

proposed development will be subject to the building regulations and to the municipal by-laws of the Swartland Municipality.

Provide a description of any other operational alternatives investigated.

N/A

Provide a motivation for the preferred operational alternative.

N/A

Provide a detailed motivation if no alternatives exist.

N/A

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

N/A

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 is not preferred for the following reasons found in the land use planning application (see **Appendix L**)

- → There is a great demand for properties in Riebeek Kasteel as well as business opportunities
- → There is very limited vacant land within the urban edge of Riebeeck Kasteel of which Erf 878 is the only large piece of vacant land within the urban edge.
- → Erf 878 is earmarked for residential and business development according to the Swartland municipal SDF.
- → According to a specialist botanical study there is virtually no natural vegetation left on Erf 878 due to long term repeated impact by agricultural practices over the whole extent of Erf 878.
- → No biodiversity issues would be impacted with the development of Erf 878 as the property is completely surrounded by extensive agricultural and urban development.
- → Swartland Municipality supports the development of Erf 878 as it will contribute financially to the municipal coffers and infrastructure.
- → The heritage and visual aspects of Erf 878 is important in the context of Riebeek Kasteel and it was found by the appropriate visual, heritage and architectural studies that the development would not compromise the sense of place of Riebeek Kasteel, provided the architectural guidelines are applied.

The proposed development on Erf 878 will formalise the maintenance of the visual and sense of place as well as maintain the possible biodiversity corridor from Erf 878 ultimately to the Berg River.

1.7.	Provide an 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.

The development process for Erf 878 in Riebeek Kasteel considered three layout alternatives, being Alternatives 1, 2, and 3—with Alternative 3 ultimately selected as the preferred option. The mitigation hierarchy was applied to the assessment of alternatives and associated impacts:

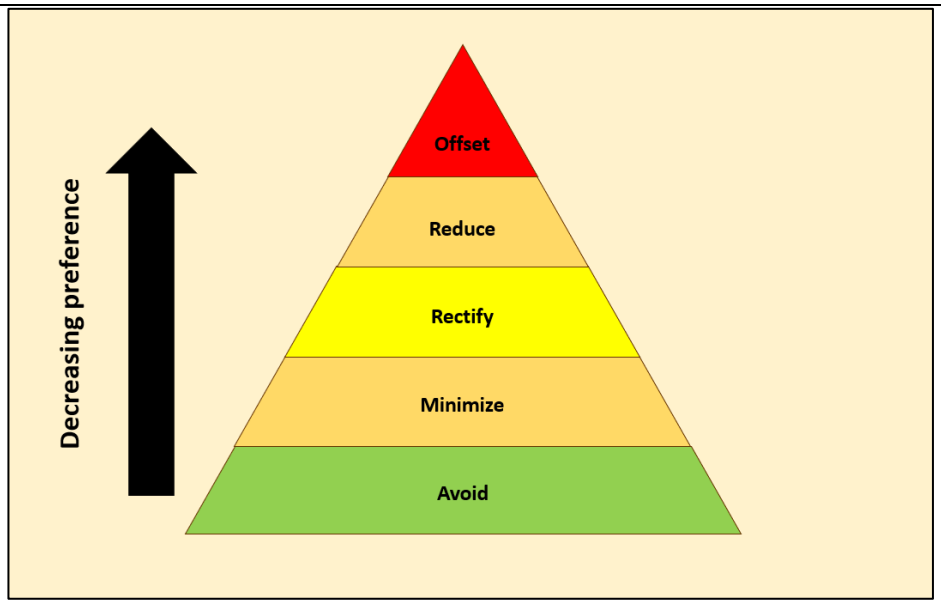


Figure 30. Mitigation hierarchy

Alternative 1, the initial layout proposed, included a wedding venue atop Riebeek Hill alongside a mix of residential, business, and community uses. While this layout aimed to capitalize on the elevated position for aesthetic and economic appeal, it introduced significant negative visual and cultural / historical impacts, obstructing the critical sight line from Church Street (R311) to the historical church 500 meters to the northeast, a key heritage feature of Riebeek-Kasteel. Public feedback and subsequent specialist studies—covering heritage, visual impact, urban design, and architecture—highlighted that this focal point disrupted the town's sense of place and scenic character. Alternative 2, while not detailed extensively in the provided context, allowed for the removal of the wedding venue and associated resort use but failed to take cognisance of the cultural aspects effectively, and replaced the wedding venue with a high-density residential offering. Both alternatives offered limited mitigation for their visual impacts and did not maximize positive outcomes, such as integration with the town's layout or ecological enhancement, making them less viable options. Both Alternative 1 and 2 retained the fuel service station which has been highlighted as a point of concern during public participation. It can be argued that the evolution of Alternative 1 to 2 attempted to apply the concept of Minimization of impact but did not consider avoidance.

Alternative 3 was developed as a refined response to the shortcomings of Alternative 1 and 2, incorporating specialist recommendations and public input. By removing the wedding venue and replacing it with low single-storey residential dwellings with large erven on Riebeek Hill, and integrating open spaces (e.g., along the Krom River), removing the fuel station completely and allowing for uninterrupted visual line of sights, Alternative 3 avoids the negative visual, cultural, sense of place impacts identified in earlier layouts. It mitigates unavoidable impacts, such as construction-phase disturbances, through measures like restricted building heights and alignment with the existing block-type layout, ensuring compatibility with the townscape. Positive impacts are maximized by preserving the Church Street sight line, enhancing visual coherence, and supporting ecological restoration, as recommended by the botanical specialist. The layout's reduction in footprint (from 110,961 m^2 to 110,087 m^2) further demonstrates a commitment to minimizing environmental disruption while maintaining a functional mix of uses. In addition, the environmental risks associated with fuel stations, particularly relative to close proximity to water resources (springs, Krom River, Wetlands) is also completely avoided through the removal of this aspect.

No additional reasonable or feasible alternatives beyond Alternative 1, 2, or 3 were deemed necessary for several reasons. First, the iterative process from Alternative 1 to 3 effectively addressed the primary environmental, visual, and cultural concerns raised during public participation and specialist assessments. Alternative 3 represents a balanced compromise that avoids the significant negative impacts of Alternative 1 and 2 (e.g., visual obstruction), mitigates unavoidable impacts through design adjustments (e.g., single-storey restrictions, open space provision), and maximizes positive outcomes (e.g., heritage preservation, ecological benefits). Introducing entirely new alternatives—such as a drastically reduced

development scope or a different land use—would either undermine the project's economic viability or fail to meet the objective of providing a mixed-use community within the urban edge, as supported by available municipal infrastructure.

Moreover, site-specific constraints, such as topography, the urban edge context, and the degraded state of existing archaeological and ecological features (e.g., "Not Conservation Worthy" remains, compromised riparian vegetation), limit the range of feasible alternatives. For instance, relocating the development entirely off Riebeek Hill to avoid any visual impact was not practical, as the flat northern section alone cannot accommodate the full scope, and the hill's slopes are integral to the mixed-use vision. Similarly, a "no-development" scenario, while eliminating all impacts, is not reasonable given the site's zoning and the municipality's capacity to support growth. The specialist studies confirmed that A3's adjustments—such as open space retention and traditional design elements—sufficiently mitigate impacts within these constraints, negating the need for further exploration.

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

The proposed mixed-use development has identified Erf 878 as the preferred and sole viable location, as it uniquely fulfils all necessary requirements for the project. Situated within the urban edge of Riebeek-Kasteel and designated for residential development in the Swartland Municipality Spatial Development Framework (SDF), Erf 878 aligns with municipal planning objectives and benefits from existing infrastructure capacity. The site's environmental context, as assessed by the botanical specialist, reveals that virtually no original natural vegetation remains—aside from one or two isolated specimens—due to extensive agricultural activity over a decade ago, minimizing ecological constraints and supporting its suitability for development. Three layout alternatives were evaluated, with Alternative 3 emerging as the preferred design following an iterative process informed by local community feedback and specialist studies in heritage, visual impact, and urban design. This preferred alternative ensures the development integrates harmoniously with the ambiance and sense of place of Riebeek-Kasteel, preserving key visual sight lines, reducing environmental impact, and enhancing the town's cultural and scenic character. Consequently, Erf 878, paired with Alternative 3, stands as the optimal choice for the proposed activity, balancing developmental goals with contextual sensitivity.

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).

Due to the extensively altered nature of the whole of Erf 878 by continuous agricultural practices over the years, there are no sensitive areas that need to be designated as no-go areas apart from the areas indicated in the preferred Alternative A3. The specialist botanical report indicated that there were no natural areas that have to be conserved. Specific design measures have been applied to Riebeek Hill, and dedicated open spaces have been incorporated to allow for the continue line of sight as well as buffers to water resources.

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

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.

Impacts are described according to their nature or type, as follows:

Nature / type of impact

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.
Intensity	**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.
	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 most conditions.
Definite	The impact will occur.

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

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

Definitions 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:	**Socioeconomic impacts** Increased employment opportunities and economic activity vs. potential disruption to local community cohesion.
Nature of impact:	**Positive** (job creation) and **negative** (social disruption due to construction and perceived change in town character).
Extent and duration of impact:	Local (Riebeek Kasteel and immediate neighbours); short-term (construction phase, ~1-2 years).
Consequence of impact or risk:	Temporary boost to local economy; potential strain on community relations due to wedding venue controversy.
Probability of occurrence:	High (construction jobs certain; community concerns evident from public feedback).
Degree to which the impact may cause irreplaceable loss of resources:	Low (no significant resource loss; social cohesion recoverable with time).
Degree to which the impact can be reversed:	High (economic benefits temporary; social impacts reversible post-construction with engagement).

Indirect impacts:	Increased demand for local services (e.g., suppliers); potential for resident dissatisfaction to affect future projects.
Cumulative impact prior to mitigation:	Moderate (economic gain offset by social tension from wedding venue placement).
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High (balancing economic benefits against community opposition).
Degree to which the impact can be avoided:	Moderate
Degree to which the impact can be managed:	High (through community consultation and construction management).
Degree to which the impact can be mitigated:	High (via local hiring, communication, and design adjustments).
Proposed mitigation:	- Employ local labour; - Engage community through regular updates; - Adjust wedding venue design to reduce visual prominence.
Residual impacts:	Minor lingering community dissatisfaction if wedding venue remains contentious.
Cumulative impact post mitigation	Low (mitigation reduces social tension while retaining economic benefits)
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High (+)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Noise impacts** Disturbance to residents and wildlife from construction activities, e.g., machinery, traffic.
Nature of impact:	Negative
Extent and duration of impact:	Local; Short-term (during construction phase)

Consequence of impact or risk:	Temporary disruption to quality of life, potential annoyance to people in the surroundings
Probability of occurrence:	High (noise inherent to construction activities like earthmoving and building).
Degree to which the impact may cause irreplaceable loss of resources:	Low (no permanent loss; temporary disturbance only).
Degree to which the impact can be reversed:	High (noise ceases upon construction completion; no lasting effects).
Indirect impacts:	Potential reduced appeal for tourism during construction; minor stress on community relations.
Cumulative impact prior to mitigation:	Moderate (combined with dust and traffic, affects liveability during construction).
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (noticeable but temporary disruption in a small-town setting).
Degree to which the impact can be avoided:	Low (construction noise unavoidable, though intensity can be reduced).
Degree to which the impact can be managed:	High (through scheduling and equipment controls).
Degree to which the impact can be mitigated:	High
Proposed mitigation:	- Limit noisy activities to daytime hours (e.g., 7 AM-5 PM); - Use low-noise equipment; - Install temporary sound barriers near sensitive areas (e.g., New Orleans neighbours); - Inform residents of schedule.
Residual impacts:	Minor residual noise during permitted hours; minimal disturbance with compliance.
Cumulative impact post mitigation	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Dust** Air quality degradation from earthworks, vehicle movement, and material handling.
Nature of impact:	Negative
Extent and duration of impact:	Local; Short-term
Consequence of impact or risk:	Temporary health risks (e.g., respiratory irritation), reduced visibility, and nuisance to residents.
Probability of occurrence:	High (dust generation inevitable during dry conditions and earthmoving).
Degree to which the impact may cause irreplaceable loss of resources:	Low (no permanent loss; air quality recovers post-construction).
Degree to which the impact can be reversed:	High (dust settles after construction; no lasting environmental damage).
Indirect impacts:	High (dust settles after construction; no lasting environmental damage).
Cumulative impact prior to mitigation:	Moderate (combined with noise and traffic, impacts air quality and liveability).
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium to low
Degree to which the impact can be avoided:	Moderate (some dust generation unavoidable, but extent can be minimised).
Degree to which the impact can be managed:	High (through dust suppression techniques).
Degree to which the impact can be mitigated:	High (standard measures effectively reduce dust spread).
Proposed mitigation:	- Regular water spraying on exposed surfaces; - Cover stockpiles; limit vehicle speeds on-site;

	- Revegetate disturbed areas promptly; - Monitor dust levels near sensitive receptors.
Residual impacts:	Minor dust during dry, windy conditions despite mitigation; quickly dissipates.
Cumulative impact post mitigation	Low (mitigation reduces interaction with other impacts like noise).
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**1. Vegetation loss** Overall loss of ecological connectivity and degradation of the Krom River corridor due to construction; transformation of 11.1 ha of vegetation previously classified as critically endangered vegetation**.** Note the findings of the botanical assessment and that the site has been significantly transformed by active agricultural activities, ploughing and ripping in the past and therefore does not represent the natural vegetation type and is characterised by grass.
Nature of impact:	Negative (vegetation clearing, soil disturbance) and indirect (altered hydrology, invasive species spread)
Extent and duration of impact:	Local; Permanent
Consequence of impact or risk:	Loss of degraded ESA functionality, potential further degradation of Krom River ecosystem.
Probability of occurrence:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low (site already transformed, no significant protected species observed)
Degree to which the impact can be reversed:	Medium-High

Indirect impacts:	Spread of invasive alien plants (e.g., Populus alba) into Krom River; socio-economic benefits from development offset by potential ecological decline.
Cumulative impact prior to mitigation:	Medium (wedding venue exacerbate ecological impact)
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Moderate
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	High (through specific measures targeting the Krom River and invasive species)
Proposed mitigation:	- All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must include the recommendations made in this report. - A suitably qualified Environmental Control Officer must be appointed to monitor the construction phase in terms of the EMP and any other conditions pertaining to specialist studies. - The layout of the development footprint should take the sensitivity of the Krom River into account and should aim to establish a suitable corridor along this river system in order to allow for potential rehabilitation of this ecosystem - The olive trees discussed under Heading 7.1 of the Botanical Assessment should be considered for replanting into green belts or gardens. - All listed alien invasive tree species must be removed from the site, while special care must be taken with the removal of white poplar (in order to ensure it does not enter the river system. - Lay-down areas or construction sites must be located at least 30m away from the Krom River corridor; - An integrated waste management approach must be implemented during construction. o Construction related general and hazardous waste may only be disposed of at suitably approved waste disposal sites.

Residual impacts:	Minor degradation of transformed veld, but moderate degradation of the Krom river corridor.
Cumulative impact post mitigation:	Moderate impact on CBA/ESA and river corridor.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**2. Visual impacts** Visual intrusion and disruption of scenic sight lines due to the wedding venue on the hilltop crest.
Nature of impact:	Negative – The wedding venue competes with the iconic church steeple as a landmark, eroding the historic townscape's character and scenic gateway experience, particularly along the R311 southern approach.
Extent and duration of impact:	Local (site and immediate surrounds, e.g., R311, Hermon Road, R46 within 1.2 km); Long-term (duration of construction and permanent structures).
Consequence of impact or risk:	Alteration of the town's sense of place, loss of scenic quality, and diminished landmark visibility, especially from the highly sensitive R311 southern "Gateway" view.
Probability of occurrence:	High – The wedding venue's prominent hilltop position ensures visibility from multiple sensitive viewpoints (e.g., R311, Bothmanskloof Pass, R46).
Degree to which the impact may cause irreplaceable loss of resources:	Medium – While not a physical resource loss, the irreversible change to the cultural landscape's visual integrity is significant.
Degree to which the impact can be reversed:	Low
Indirect impacts:	Potential community dissatisfaction and reduced tourism appeal due to altered scenic character.

Cumulative impact prior to mitigation:	High – Adds to existing visual clutter (e.g., Het Vlok Kasteel warehouse) and competes with historic landmarks.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High – Due to sensitivity of the R311 gateway and low visual absorption capacity (VAC) of the hilltop crest.
Degree to which the impact can be avoided:	High – Removing the venue from the crest avoids the impact entirely.
Degree to which the impact can be managed:	Medium – Layout design adjustments
Degree to which the impact can be mitigated:	Medium – Mitigation can soften but not fully negate the impact of a hilltop structure.
Proposed mitigation:	- The alternatives should be further explored to better fit the town grid and the site contours. The retention of Riebeek Hill as significant Open Space should be considered. - Architecture: The design of buildings needs to incorporate traditional typologies and details that will make a better fit with this historic town and prevent a modernist intrusion on a heritage landscape. - Landscape Plan: A Landscape Plan has already been prepared and a reference to traditional tree and shrub species is desirable e.g. Oak and Gum trees. - Tree Plan: Trees both on-site and adjacent need to be mapped to ensure their conservation and incorporation into the development, including both traditional heritage tree species like oaks, gums and poplars, and indigenous/endemic species like Wild Olive. - Planting: There is no need to rigidly adhere to any “indigenous-only” kind of botanical extremism in an urban setting, especially one with strong historic connections. - Fencing: Is always a key feature of Architectural/Landscape detailing as it strongly affects the edge condition. Subtle, well-detailed, traditional fencing options and colours are preferred. ClearVu fencing is not desirable especially along the R311. - Colouration: Colouration is a key tool to fitting any development into the landscape. There is a strong tendency for monotonous charcoal/grey estate colourations today and black fencing ClearVu fencing. These are not traditional colours in the Cape and detract from both contemporary and historic environments. A subtle combination of scheme colours needs to be

	developed that will avoid a mass approach to colouration with a high visual impact. - Maintenance: Landscape Maintenance, both private and public, including streetscapes, needs to be integrated into the scheme. - Damage Control: All parties must make every effort to control the destruction of soils and vegetation on site, especially any remnants of natural vegetation. These must not be damaged under any circumstances. - Pollution: Chemical damage by cement mixing directly on the ground and by diesel, etc spills must also be prevented at all costs, as should vandalism of the plants and accidental damage to limbs by workers and machinery. Fires must be prevented also at all costs in all areas. Penalties and incentives should be implemented as can fencing off areas. - Monitoring: Monitoring of the landscape, soils and vegetation during construction is very important and must be attended to regularly. Damage to some is all too inevitable and often irreversible. Adequate indigenous (preferably endemic) vegetation must be planted.
Residual impacts:	High – Very High visual impact that cannot be significantly mitigated.
Cumulative impact post mitigation:	High – due to noticeable change in the landscape character
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Archaeological impacts** Disturbance or destruction of archaeological remains (ESA and MSA flakes, chunks, and a historical tile).
Nature of impact:	Negative: physical disturbance due to earthworks, construction, and infrastructure installation.
Extent and duration of impact:	Local; Short-term (during construction phase)
Consequence of impact or risk:	Minor loss of degraded archaeological material graded as Not Conservation Worthy (NCW).

Probability of occurrence:	High (construction will likely disturb surface and subsurface remains).
Degree to which the impact may cause irreplaceable loss of resources:	Low (remains are degraded, isolated, and not significant; no graves or settlements identified).
Degree to which the impact can be reversed:	Low (once disturbed, physical remains cannot be restored to original context).
Indirect impacts:	Potential minor disruption to historical narrative of site, though negligible due to low significance.
Cumulative impact prior to mitigation:	Low (site already transformed by agriculture; additional impact is minimal).
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (due to Non-Conservation Worthy grading and degraded context).
Degree to which the impact can be avoided:	Low (development footprint covers areas where remains were found).
Degree to which the impact can be managed:	High (monitoring and recording can manage any finds).
Degree to which the impact can be mitigated:	High (simple measures can address low significance remains).
Proposed mitigation:	→ No further archaeological mitigation is required. → No archaeological monitoring is required during construction phase excavations. → If any buried human remains are uncovered during construction excavations, these must be immediately reported to the archaeologist (J Kaplan 082 3210172. Burials must not be disturbed until inspected by the archaeologist.
Residual impacts:	Negligible (loss of already disturbed, low value remains).
Cumulative impact post mitigation:	Very Low (mitigation ensures minimal additional impact).
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Very low (-)**

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Traffic Impact** Increased traffic congestion and safety risks during construction due to delivery vehicles and equipment movement.
Nature of impact:	Negative; Temporary disruption to local traffic flow and potential safety hazards on Church Rd and Fontein St.
Extent and duration of impact:	Local (intersections along Church Rd and Fontein St); Short-term (construction period, likely 1-2 years).
Consequence of impact or risk:	Minor delays and increased risk of accidents at access points; moderate due to wedding venue-related traffic.
Probability of occurrence:	High – Construction activities are inevitable, with additional trips from wedding venue setup.
Degree to which the impact may cause irreplaceable loss of resources:	Low – No loss of physical resources; temporary disruption only.
Degree to which the impact can be reversed:	High – Impacts cease post-construction; roads return to normal operation.
Indirect impacts:	Noise and dust affecting nearby residents; potential delays for public transport users.
Cumulative impact prior to mitigation:	Moderate – Combined effect of construction and background traffic growth by 2028.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – Manageable but noticeable disruption during peak construction.
Degree to which the impact can be avoided:	Low – Construction traffic is unavoidable, though wedding venue removal in A3 reduces intensity.
Degree to which the impact can be managed:	High – Through scheduling and traffic control measures.

Degree to which the impact can be mitigated:	High – With proper planning and design adherence.
Proposed mitigation:	→ The proposed access off Church Rd should be designed according to the local and provincial guidelines. Attention should be given to sight distances from the access along Church Road; → The proposed access on Fontein Street should be designed according to local guidelines; → The route through the development connecting Church Road in the west with Fontein Street in the east should have a blacktop width of at least 6,0 m. Other internal access roads should have minimum blacktop widths of 5,5 m and bell-mouth radii of 6,0m (minimum 5,0m); → Off-street parking should be provided as per the Swartland Municipality Land Use Planning By-law document; → It is proposed that adequate public transport facilities be provided at the filling station and adjacent retail premises; → It is furthermore proposed that a surfaced sidewalk be provided along at least one side of the Class 5 Local Street (13 m reserve) through the development and up to the filling station premises.
Residual impacts:	Minor delays during peak construction periods.
Cumulative impact post mitigation:	Low – Mitigated to background levels with minimal additional effect.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Freshwater
Nature of impact:	Loss of highly degraded seep wetland areas identified on site
Extent and duration of impact:	Local; long term
Consequence of impact or risk:	Medium to high, loss of wetland area regardless of degradation level;

Probability of occurrence:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low due to level of degradation
Degree to which the impact can be reversed:	Low
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Continued loss of wetland habitat regardless of degradation level
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ The loss of the seriously degraded Seep Wetland 2, along with the loss of portions of Seep Wetland 1, should be compensated for by rehabilitating the Remnant Seep Wetland 1. → No untreated stormwater should enter the Remnant Seep Wetland 1 or "Offset" wetland area. → Avoid encroachment into the remnant Seep Wetland 1 and the Krom River during construction and operational phases. These two areas should be set aside as a No Go for construction and operational phases. → A 20 m buffer area should be implemented around the remnant Seep Wetland 1; and a 10 m buffer around the Krom River (aboveground). The portions of the buffer areas that are located outside of the demarcated construction footprint should be designated as a No-Go area. → Tie into mainline sewage if possible or use fully contained conservancy tanks serviced by truck. No sewage treatment, irrigation or soak-aways should be contemplated. → Allowance must be made for stormwater to be treated in a vegetated detention pond and/or a substantial vegetated swale before release into the Krom River or Remnant Seep Wetland 1.

	→ Municipal water supply should be used if possible.
Residual impacts:	N/A
Cumulative impact post mitigation:	Continued wetland loss regardless of level of degradation
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low -ve**
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**Socioeconomic impacts** Tourism and economic growth from wedding venue vs. long-term change to town character and local lifestyle.
Nature of impact:	Positive (revenue, jobs)
Extent and duration of impact:	Local to regional (visitors from beyond Riebeek-Kasteel); long-term (duration of venue operation).
Consequence of impact or risk:	Economic upliftment for businesses; potential overburdening of infrastructure and resident discontent.
Probability of occurrence:	High (wedding venue likely to attract visitors; public concerns already noted).
Degree to which the impact may cause irreplaceable loss of resources:	Medium (loss of town's tranquil character difficult to quantify or replace).
Degree to which the impact can be reversed:	Moderate
Indirect impacts:	Growth in hospitality sector; potential property value changes;
Cumulative impact prior to mitigation:	High (economic benefits vs. significant community and infrastructure strain).

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (economic benefits vs. significant community and infrastructure strain).
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	Moderate
Proposed mitigation:	- Employ local individuals during the operational phase as far as possible - Use local service providers as far as possible
Residual impacts:	Reduced community resistance due to job creation; manageable infrastructure load if mitigations are implemented effectively.
Cumulative impact post mitigation:	Medium-High (economic benefits remain, but community and infrastructure strain are reduced).
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High (+)**
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**Ecological impacts** Ongoing degradation of the Krom River corridor and increased invasive alien plant infestation.
Nature of impact:	Negative
Extent and duration of impact:	Local (Krom River corridor and 11.1 ha site); Permanent unless actively managed.
Consequence of impact or risk:	Reduced ecological connectivity and potential further degradation of the CBA/ESA along the Krom River.

Probability of occurrence:	Probable (depends on maintenance practices; high if no alien control is implemented).
Degree to which the impact may cause irreplaceable loss of resources:	High
Degree to which the impact can be reversed:	Medium
Indirect impacts:	Spread of invasive species downstream, affecting broader river ecology; increased veld fire risk.
Cumulative impact prior to mitigation:	Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Medium – Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	- All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must include the recommendations made in this report. - A suitably qualified Environmental Control Officer must be appointed to monitor the construction phase in terms of the EMP and any other conditions pertaining to specialist studies. - The layout of the development footprint should take the sensitivity of the Krom River into account and should aim to establish a suitable corridor along this river system in order to allow for potential rehabilitation of this ecosystem - The olive trees discussed under Heading 7.1 of the Botanical Assessment should be considered for replanting into green belts or gardens. - All listed alien invasive tree species must be removed from the site, while special care must be taken with the removal of white poplar (in order to ensure it does not enter the river system. - Lay-down areas or construction sites must be located at least 30m away from the Krom River corridor;

	- An integrated waste management approach must be implemented during construction. o Construction related general and hazardous waste may only be disposed of at suitably approved waste disposal sites.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**Visual impacts** Ongoing visual prominence of the wedding venue, competing with the church steeple and altering the town's scenic identity.
Nature of impact:	Negative – Permanent alteration of key sight lines (e.g., R311 southern approach, R46, Bothmanskloof Pass) and introduction of a new, dominant landmark.
Extent and duration of impact:	Local to regional (visible from R311, R46, and elevated points up to 1.8 km away); Permanent (for the lifespan of the development).
Consequence of impact or risk:	Erosion of the historic townscape's landmark qualities, reduced scenic appeal, and potential conflict with the town's cultural identity.
Probability of occurrence:	Definite - The venue's hilltop location ensures visibility from sensitive viewpoints as noted in the VIA.
Degree to which the impact may cause irreplaceable loss of resources:	High – Loss of visual heritage value, though not a tangible resource, is significant and difficult to restore.
Degree to which the impact can be reversed:	Low

Indirect impacts:	Possible decline in visitor experience and local property values due to diminished scenic quality.
Cumulative impact prior to mitigation:	High – Reinforces existing visual intrusions and competes with established landmarks over time
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very High – High sensitivity of views (e.g., R311 gateway) and low VAC of the crest amplify the impact.
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium – Lighting control and landscaping can reduce prominence, but not the venue's inherent visibility.
Degree to which the impact can be mitigated:	Medium – Screening with vegetation and subtle design can lessen, but not eliminate, the impact.
Proposed mitigation:	-
Residual impacts:	Persistent alteration of the ridge line and partial competition with the church steeple.
Cumulative impact post mitigation:	Medium-High – Mitigation reduces severity, but cumulative scenic degradation remains.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High (-)**
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**Traffic Impact** Increased traffic volumes and potential congestion at intersections due to wedding venue and mixed-use components.
Nature of impact:	Negative – Added trips (e.g., 234 AM, 577 PM per TIA) with higher peaks from wedding events.

Extent and duration of impact:	Local (Church Rd, Fontein St intersections); Long-term (duration of development operation).
Consequence of impact or risk:	Moderate delays (e.g., 3-7.6s per TIA Table 5) with worse peak delays from wedding venue events; safety risks at access points.
Probability of occurrence:	High – Wedding venue and mixed-use elements ensure consistent trip generation.
Degree to which the impact may cause irreplaceable loss of resources:	Low – No physical resource loss; impacts are operational.
Degree to which the impact can be reversed:	High – Traffic impacts reversible if wedding venue use is ceased
Indirect impacts:	Increased demand for public transport; pedestrian safety risks without sidewalks; noise from wedding events.
Cumulative impact prior to mitigation:	Moderate – Background 2028 traffic plus development trips, exacerbated by wedding venue peak events.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High – Noticeable impact on service levels, especially during wedding events.
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:	Low
Proposed mitigation:	- The proposed access off Church Rd should be designed according to the local and provincial guidelines. Attention should be given to sight distances from the access along Church Road - The proposed access on Fontein Street should be designed according to local guidelines - The route through the development connecting Church Road in the west with Fontein Street in the east should have a blacktop width of at least 6,0 m. Other internal access roads should have minimum blacktop widths of 5,5 m and bell-mouth radii of 6,0m (minimum 5,0m)

	- Off-street parking should be provided as per the Swartland Municipality Land Use Planning By-law document - It is proposed that adequate public transport facilities be provided at the filling station and adjacent retail premises - It is furthermore proposed that a surfaced sidewalk be provided along at least one side of the Class 5 Local Street (13 m reserve) through the development and up to the filling station premises.	
Residual impacts:	Slight delays during peak wedding events; minor pedestrian inconvenience if sidewalk use is low.	
Cumulative impact post mitigation:	Medium	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Medium (-)**	**Low (-)**
POST-CONSTRUCTION PHASE		
Potential impact and risk:	Freshwater	
Nature of impact:	Loss of highly degraded seep wetland areas identified on site	
Extent and duration of impact:	Local; long term	
Consequence of impact or risk:	Medium to high, loss of wetland area regardless of degradation level;	
Probability of occurrence:	High	
Degree to which the impact may cause irreplaceable loss of resources:	Low due to level of degradation	
Degree to which the impact can be reversed:	Low	
Indirect impacts:	N/A	

Cumulative impact prior to mitigation:	Continued loss of wetland habitat regardless of degradation level
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ The loss of the seriously degraded Seep Wetland 2, along with the loss of portions of Seep Wetland 1, should be compensated for by rehabilitating the Remnant Seep Wetland 1. → No untreated stormwater should enter the Remnant Seep Wetland 1 or "Offset" wetland area. → Avoid encroachment into the remnant Seep Wetland 1 and the Krom River during construction and operational phases. These two areas should be set aside as a No Go for construction and operational phases. → A 20 m buffer area should be implemented around the remnant Seep Wetland 1; and a 10 m buffer around the Krom River (aboveground). The portions of the buffer areas that are located outside of the demarcated construction footprint should be designated as a No-Go area. → Tie into mainline sewage if possible or use fully contained conservancy tanks serviced by truck. No sewage treatment, irrigation or soak-aways should be contemplated. → Allowance must be made for stormwater to be treated in a vegetated detention pond and/or a substantial vegetated swale before release into the Krom River or Remnant Seep Wetland 1. Municipal water supply should be used if possible.
Residual impacts:	N/A
Cumulative impact post mitigation:	Continued wetland loss regardless of level of degradation

Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low -ve**
DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	N/A
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

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Socioeconomic impacts** Increased employment opportunities and economic activity vs. potential disruption to local community cohesion.
Nature of impact:	**Positive** (job creation) and **negative** (social disruption due to construction and perceived change in town character).

Extent and duration of impact:	Local (Riebeek-Kasteel and immediate neighbours); short-term (construction phase, ~1-2 years).
Consequence of impact or risk:	Temporary boost to local economy; potential strain on community relations due to wedding venue controversy.
Probability of occurrence:	High (construction jobs certain; community concerns evident from public feedback).
Degree to which the impact may cause irreplaceable loss of resources:	Low (no significant resource loss; social cohesion recoverable with time).
Degree to which the impact can be reversed:	High (economic benefits temporary; social impacts reversible post-construction with engagement).
Indirect impacts:	Increased demand for local services (e.g., suppliers); potential for resident dissatisfaction to affect future projects.
Cumulative impact prior to mitigation:	Moderate (economic gain offset by social tension from wedding venue placement).
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High (balancing economic benefits against community opposition).
Degree to which the impact can be avoided:	Moderate
Degree to which the impact can be managed:	High (through community consultation and construction management).
Degree to which the impact can be mitigated:	High (via local hiring, communication, and design adjustments).
Proposed mitigation:	- Employ local labour; - Engage community through regular updates; - Adjust wedding venue design to reduce visual prominence.
Residual impacts:	Minor lingering community dissatisfaction if wedding venue remains contentious.
Cumulative impact post mitigation	Low (mitigation reduces social tension while retaining economic benefits)

Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High (+)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Noise impacts** Disturbance to residents and wildlife from construction activities, e.g., machinery, traffic.
Nature of impact:	Negative
Extent and duration of impact:	Local; Short-term (during construction phase)
Consequence of impact or risk:	Temporary disruption to quality of life, potential annoyance to people in the surroundings
Probability of occurrence:	High (noise inherent to construction activities like earthmoving and building).
Degree to which the impact may cause irreplaceable loss of resources:	Low (no permanent loss; temporary disturbance only).
Degree to which the impact can be reversed:	High (noise ceases upon construction completion; no lasting effects).
Indirect impacts:	Potential reduced appeal for tourism during construction; minor stress on community relations.
Cumulative impact prior to mitigation:	Moderate (combined with dust and traffic, affects liveability during construction).
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (noticeable but temporary disruption in a small-town setting).
Degree to which the impact can be avoided:	Low (construction noise unavoidable, though intensity can be reduced).
Degree to which the impact can be managed:	High (through scheduling and equipment controls).

Degree to which the impact can be mitigated:	High
Proposed mitigation:	- Limit noisy activities to daytime hours (e.g., 7 AM-5 PM); - Use low-noise equipment; - Install temporary sound barriers near sensitive areas (e.g., New Orleans neighbours); - Inform residents of schedule.
Residual impacts:	Minor residual noise during permitted hours; minimal disturbance with compliance.
Cumulative impact post mitigation	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Dust** Air quality degradation from earthworks, vehicle movement, and material handling.
Nature of impact:	Negative
Extent and duration of impact:	Local; Short-term
Consequence of impact or risk:	Temporary health risks (e.g., respiratory irritation), reduced visibility, and nuisance to residents.
Probability of occurrence:	High (dust generation inevitable during dry conditions and earthmoving).
Degree to which the impact may cause irreplaceable loss of resources:	Low (no permanent loss; air quality recovers post-construction).
Degree to which the impact can be reversed:	High (dust settles after construction; no lasting environmental damage).
Indirect impacts:	High (dust settles after construction; no lasting environmental damage).

Cumulative impact prior to mitigation:	Moderate (combined with noise and traffic, impacts air quality and liveability).
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High
Degree to which the impact can be avoided:	Moderate (some dust generation unavoidable, but extent can be minimised).
Degree to which the impact can be managed:	High (through dust suppression techniques).
Degree to which the impact can be mitigated:	High (standard measures effectively reduce dust spread).
Proposed mitigation:	- Regular water spraying on exposed surfaces; - Cover stockpiles; limit vehicle speeds on-site; - Revegetate disturbed areas promptly; - Monitor dust levels near sensitive receptors.
Residual impacts:	Minor dust during dry, windy conditions despite mitigation; quickly dissipates.
Cumulative impact post mitigation	Low (mitigation reduces interaction with other impacts like noise).
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Vegetation loss** Overall loss of ecological connectivity and degradation of the Krom River corridor due to construction; transformation of 11.1 ha transformed vegetation**.**
Nature of impact:	Negative (vegetation clearing, soil disturbance) and indirect (altered hydrology, invasive species spread)
Extent and duration of impact:	Local; Permanent

Consequence of impact or risk:	Loss of degraded CBA/ESA functionality, potential further degradation of Krom River ecosystem.
Probability of occurrence:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low (site already transformed, no significant protected species observed).
Degree to which the impact can be reversed:	Medium-High
Indirect impacts:	Spread of invasive alien plants (e.g., Populus alba) into Krom River; socio-economic benefits from development offset by potential ecological decline.
Cumulative impact prior to mitigation:	Medium (wedding venue exacerbate ecological impact)
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High
Degree to which the impact can be avoided:	Moderate
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	High (through specific measures targeting the Krom River and invasive species)
Proposed mitigation:	- All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must include the recommendations made in this report. - A suitably qualified Environmental Control Officer must be appointed to monitor the construction phase in terms of the EMP and any other conditions pertaining to specialist studies. - The layout of the development footprint should take the sensitivity of the Krom River into account and should aim to establish a suitable corridor along this river system in order to allow for potential rehabilitation of this ecosystem - The olive trees discussed under Heading 7.1 of the Botanical Assessment should be considered for replanting into green belts or gardens.

	- All listed alien invasive tree species must be removed from the site, while special care must be taken with the removal of white poplar (in order to ensure it does not enter the river system. - Lay-down areas or construction sites must be located at least 30m away from the Krom River corridor; - An integrated waste management approach must be implemented during construction. o Construction related general and hazardous waste may only be disposed of at suitably approved waste disposal sites.
Residual impacts:	Minor degradation of transformed veld, but moderate degradation of the Krom river corridor.
Cumulative impact post mitigation:	Moderate impact on CBA/ESA and river corridor.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Visual impacts** Visual intrusion and disruption of scenic sight lines due to the wedding venue on the hilltop crest.
Nature of impact:	Negative – The wedding venue competes with the iconic church steeple as a landmark, eroding the historic townscape's character and scenic gateway experience, particularly along the R311 southern approach.
Extent and duration of impact:	Local (site and immediate surrounds, e.g., R311, Hermon Road, R46 within 1.2 km); Long-term (duration of construction and permanent structures).
Consequence of impact or risk:	Alteration of the town's sense of place, loss of scenic quality, and diminished landmark visibility, especially from the highly sensitive R311 southern "Gateway" view.
Probability of occurrence:	High – The wedding venue's prominent hilltop position ensures visibility from multiple sensitive viewpoints (e.g., R311, Bothmanskloof Pass, R46).

Degree to which the impact may cause irreplaceable loss of resources:	Medium – While not a physical resource loss, the irreversible change to the cultural landscape's visual integrity is significant.
Degree to which the impact can be reversed:	Low
Indirect impacts:	Potential community dissatisfaction and reduced tourism appeal due to altered scenic character.
Cumulative impact prior to mitigation:	High – Adds to existing visual clutter (e.g., Het Vlok Kasteel warehouse) and competes with historic landmarks.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High – Due to sensitivity of the R311 gateway and low visual absorption capacity (VAC) of the hilltop crest.
Degree to which the impact can be avoided:	High – Removing the venue from the crest avoids the impact entirely.
Degree to which the impact can be managed:	Medium – Layout design adjustments
Degree to which the impact can be mitigated:	Medium – Mitigation can soften but not fully negate the impact of a hilltop structure.
Proposed mitigation:	- The alternatives should be further explored to better fit the town grid and the site contours. The retention of Riebeek Hill as significant Open Space should be considered. - Architecture: The design of buildings needs to incorporate traditional typologies and details that will make a better fit with this historic town and prevent a modernist intrusion on a heritage landscape. - Landscape Plan: A Landscape Plan has already been prepared and a reference to traditional tree and shrub species is desirable e.g. Oak and Gum trees. - Tree Plan: Trees both on-site and adjacent need to be mapped to ensure their conservation and incorporation into the development, including both traditional heritage tree species like oaks, gums and poplars, and indigenous/endemic species like Wild Olive. - Planting: There is no need to rigidly adhere to any "indigenous-only" kind of botanical extremism in an urban setting, especially one with strong historic connections.

	- Fencing: Is always a key feature of Architectural/Landscape detailing as it strongly affects the edge condition. Subtle, well-detailed, traditional fencing options and colours are preferred. ClearVu fencing is not desirable especially along the R311. - Colouration: Colouration is a key tool to fitting any development into the landscape. There is a strong tendency for monotonous charcoal/grey estate colourations today and black fencing ClearVu fencing. These are not traditional colours in the Cape and detract from both contemporary and historic environments. A subtle combination of scheme colours needs to be developed that will avoid a mass approach to colouration with a high visual impact. - Maintenance: Landscape Maintenance, both private and public, including streetscapes, needs to be integrated into the scheme. - Damage Control: All parties must make every effort to control the destruction of soils and vegetation on site, especially any remnants of natural vegetation. These must not be damaged under any circumstances. - Pollution: Chemical damage by cement mixing directly on the ground and by diesel, etc spills must also be prevented at all costs, as should vandalism of the plants and accidental damage to limbs by workers and machinery. Fires must be prevented also at all costs in all areas. Penalties and incentives should be implemented as can fencing off areas. - Monitoring: Monitoring of the landscape, soils and vegetation during construction is very important and must be attended to regularly. Damage to some is all too inevitable and often irreversible. Adequate indigenous (preferably endemic) vegetation must be planted.
Residual impacts:	High – Very High visual impact that cannot be significantly mitigated.
Cumulative impact post mitigation:	High – due to noticeable change in the landscape character
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Archaeological impacts**

	Disturbance or destruction of archaeological remains (ESA and MSA flakes, chunks, and a historical tile).
Nature of impact:	Negative: physical disturbance due to earthworks, construction, and infrastructure installation.
Extent and duration of impact:	Local; Short-term (during construction phase)
Consequence of impact or risk:	Minor loss of degraded archaeological material graded as Not Conservation Worthy (NCW).
Probability of occurrence:	High (construction will likely disturb surface and subsurface remains).
Degree to which the impact may cause irreplaceable loss of resources:	Low (remains are degraded, isolated, and not significant; no graves or settlements identified).
Degree to which the impact can be reversed:	Low (once disturbed, physical remains cannot be restored to original context).
Indirect impacts:	Potential minor disruption to historical narrative of site, though negligible due to low significance.
Cumulative impact prior to mitigation:	Low (site already transformed by agriculture; additional impact is minimal).
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (due to NCW grading and degraded context).
Degree to which the impact can be avoided:	Low (development footprint covers areas where remains were found).
Degree to which the impact can be managed:	High (monitoring and recording can manage any finds).
Degree to which the impact can be mitigated:	High (simple measures can address low significance remains).
Proposed mitigation:	- No further archaeological mitigation is required. - No archaeological monitoring is required during construction phase excavations

	- If any buried human remains are uncovered during construction excavations, these must be immediately reported to the archaeologist (J Kaplan 082 3210172. Burials must not be disturbed until inspected by the archaeologist.
Residual impacts:	Negligible (loss of already disturbed, low value remains).
Cumulative impact post mitigation:	Very Low (mitigation ensures minimal additional impact).
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Very low (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Traffic Impact** Increased traffic congestion and safety risks during construction due to delivery vehicles and equipment movement.
Nature of impact:	Negative; Temporary disruption to local traffic flow and potential safety hazards on Church Rd and Fontein St.
Extent and duration of impact:	Local (intersections along Church Rd and Fontein St); Short-term (construction period, likely 1-2 years).
Consequence of impact or risk:	Minor delays and increased risk of accidents at access points; moderate due to wedding venue-related traffic.
Probability of occurrence:	High – Construction activities are inevitable, with additional trips from wedding venue setup.
Degree to which the impact may cause irreplaceable loss of resources:	Low – No loss of physical resources; temporary disruption only.
Degree to which the impact can be reversed:	High – Impacts cease post-construction; roads return to normal operation.
Indirect impacts:	Noise and dust affecting nearby residents; potential delays for public transport users.

Cumulative impact prior to mitigation:	Moderate – Combined effect of construction and background traffic growth by 2028.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – Manageable but noticeable disruption during peak construction.
Degree to which the impact can be avoided:	Low – Construction traffic is unavoidable, though wedding venue removal in A3 reduces intensity.
Degree to which the impact can be managed:	High – Through scheduling and traffic control measures.
Degree to which the impact can be mitigated:	High – With proper planning and design adherence.
Proposed mitigation:	- The proposed access off Church Rd should be designed according to the local and provincial guidelines. Attention should be given to sight distances from the access along Church Road; - The proposed access on Fontein Street should be designed according to local guidelines; - The route through the development connecting Church Road in the west with Fontein Street in the east should have a blacktop width of at least 6,0 m. Other internal access roads should have minimum blacktop widths of 5,5 m and bell-mouth radii of 6,0m (minimum 5,0m); - Off-street parking should be provided as per the Swartland Municipality Land Use Planning By-law document; - It is proposed that adequate public transport facilities be provided at the filling station and adjacent retail premises; - It is furthermore proposed that a surfaced sidewalk be provided along at least one side of the Class 5 Local Street (13 m reserve) through the development and up to the filling station premises.
Residual impacts:	Minor delays during peak construction periods.
Cumulative impact post mitigation:	Low – Mitigated to background levels with minimal additional effect.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High):	**Low (-)**

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Freshwater
Nature of impact:	Loss of highly degraded seep wetland areas identified on site
Extent and duration of impact:	Local; long term
Consequence of impact or risk:	Medium to high, loss of wetland area regardless of degradation level;
Probability of occurrence:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low due to level of degradation
Degree to which the impact can be reversed:	Low
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Continued loss of wetland habitat regardless of degradation level
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ The loss of the seriously degraded Seep Wetland 2, along with the loss of portions of Seep Wetland 1, should be compensated for by rehabilitating the Remnant Seep Wetland 1. → No untreated stormwater should enter the Remnant Seep Wetland 1 or "Offset" wetland area.

	→ Avoid encroachment into the remnant Seep Wetland 1 and the Krom River during construction and operational phases. These two areas should be set aside as a No Go for construction and operational phases. → A 20 m buffer area should be implemented around the remnant Seep Wetland 1; and a 10 m buffer around the Krom River (aboveground). The portions of the buffer areas that are located outside of the demarcated construction footprint should be designated as a No-Go area. → Tie into mainline sewage if possible or use fully contained conservancy tanks serviced by truck. No sewage treatment, irrigation or soak-aways should be contemplated. → Allowance must be made for stormwater to be treated in a vegetated detention pond and/or a substantial vegetated swale before release into the Krom River or Remnant Seep Wetland 1. Municipal water supply should be used if possible.
Residual impacts:	N/A
Cumulative impact post mitigation:	Continued wetland loss regardless of level of degradation
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low -ve**
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**Socioeconomic impacts** Tourism and economic growth from wedding venue vs. long-term change to town character and local lifestyle.
Nature of impact:	Positive (revenue, jobs)
Extent and duration of impact:	Local to regional (visitors from beyond Riebeek-Kasteel); long-term (duration of venue operation).
Consequence of impact or risk:	Economic upliftment for businesses; potential overburdening of infrastructure and resident discontent.
Probability of occurrence:	High (wedding venue likely to attract visitors; public concerns already noted).

Degree to which the impact may cause irreplaceable loss of resources:	Medium (loss of town's tranquil character difficult to quantify or replace).
Degree to which the impact can be reversed:	Moderate
Indirect impacts:	Growth in hospitality sector; potential property value changes;
Cumulative impact prior to mitigation:	High (economic benefits vs. significant community and infrastructure strain).
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High):	High (economic benefits vs. significant community and infrastructure strain).
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	Moderate
Proposed mitigation:	- Employ local individuals during the operation phase.
Residual impacts:	Reduced community resistance due to job creation; manageable infrastructure load if mitigations are implemented effectively.
Cumulative impact post mitigation:	Medium-High (economic benefits remain, but community and infrastructure strain are reduced).
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High (+)**
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**Ecological impacts** Ongoing degradation of the Krom River corridor and increased invasive alien plant infestation.

Nature of impact:	Negative
Extent and duration of impact:	Local (Krom River corridor and 11.1 ha site); Permanent unless actively managed.
Consequence of impact or risk:	Reduced ecological connectivity and potential further degradation of the CBA/ESA along the Krom River.
Probability of occurrence:	Probable (depends on maintenance practices; high if no alien control is implemented).
Degree to which the impact may cause irreplaceable loss of resources:	High
Degree to which the impact can be reversed:	Medium
Indirect impacts:	Spread of invasive species downstream, affecting broader river ecology; increased veld fire risk.
Cumulative impact prior to mitigation:	Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Medium – Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	- All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must include the recommendations made in this report. - A suitably qualified Environmental Control Officer must be appointed to monitor the construction phase in terms of the EMP and any other conditions pertaining to specialist studies. - The layout of the development footprint should take the sensitivity of the Krom River into account and should aim to

	establish a suitable corridor along this river system in order to allow for potential rehabilitation of this ecosystem - The olive trees discussed under Heading 7.1 of the Botanical Assessment should be considered for replanting into green belts or gardens. - All listed alien invasive tree species must be removed from the site, while special care must be taken with the removal of white poplar (in order to ensure it does not enter the river system. - Lay-down areas or construction sites must be located at least 30m away from the Krom River corridor; - An integrated waste management approach must be implemented during construction. o Construction related general and hazardous waste may only be disposed of at suitably approved waste disposal sites.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**Visual impacts** Ongoing visual prominence of the wedding venue, competing with the church steeple and altering the town's scenic identity.
Nature of impact:	Negative – Permanent alteration of key sight lines (e.g., R311 southern approach, R46, Bothmanskloof Pass) and introduction of a new, dominant landmark.
Extent and duration of impact:	Local to regional (visible from R311, R46, and elevated points up to 1.8 km away); Permanent (for the lifespan of the development).
Consequence of impact or risk:	Erosion of the historic townscape's landmark qualities, reduced scenic appeal, and potential conflict with the town's cultural identity.

Probability of occurrence:	Definite - The venue's hilltop location ensures visibility from sensitive viewpoints as noted in the VIA.
Degree to which the impact may cause irreplaceable loss of resources:	High – Loss of visual heritage value, though not a tangible resource, is significant and difficult to restore.
Degree to which the impact can be reversed:	Low
Indirect impacts:	Possible decline in visitor experience and local property values due to diminished scenic quality.
Cumulative impact prior to mitigation:	High – Reinforces existing visual intrusions and competes with established landmarks over time
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very High – High sensitivity of views (e.g., R311 gateway) and low VAC of the crest amplify the impact.
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium – Lighting control and landscaping can reduce prominence, but not the venue's inherent visibility.
Degree to which the impact can be mitigated:	Medium – Screening with vegetation and subtle design can lessen, but not eliminate, the impact.
Proposed mitigation:	
Residual impacts:	Persistent alteration of the ridge line and partial competition with the church steeple.
Cumulative impact post mitigation:	Medium-High – Mitigation reduces severity, but cumulative scenic degradation remains.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High):	**High (-)**

POST-CONSTRUCTION PHASE	
Potential impact and risk:	**Traffic Impact** Increased traffic volumes and potential congestion at intersections due to wedding venue and mixed-use components.
Nature of impact:	Negative
Extent and duration of impact:	Local (Church Rd, Fontein St intersections); Long-term (duration of development operation).
Consequence of impact or risk:	Moderate delays with worse peak delays from wedding venue events; safety risks at access points.
Probability of occurrence:	High – Wedding venue and mixed-use elements ensure consistent trip generation.
Degree to which the impact may cause irreplaceable loss of resources:	Low – No physical resource loss; impacts are operational.
Degree to which the impact can be reversed:	High – Traffic impacts reversible if wedding venue use is ceased
Indirect impacts:	Increased demand for public transport; pedestrian safety risks without sidewalks; noise from wedding events.
Cumulative impact prior to mitigation:	Moderate – Background 2028 traffic plus development trips, exacerbated by wedding venue peak events.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High):	Medium-High – Noticeable impact on service levels, especially during wedding events.
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:	Low

Proposed mitigation:	- The proposed access off Church Rd should be designed according to the local and provincial guidelines. Attention should be given to sight distances from the access along Church Road; - The proposed access on Fontein Street should be designed according to local guidelines; - The route through the development connecting Church Road in the west with Fontein Street in the east should have a blacktop width of at least 6,0 m. Other internal access roads should have minimum blacktop widths of 5,5 m and bell-mouth radii of 6,0m (minimum 5,0m); - Off-street parking should be provided as per the Swartland Municipality Land Use Planning By-law document; - It is proposed that adequate public transport facilities be provided at the filling station and adjacent retail premises; - It is furthermore proposed that a surfaced sidewalk be provided along at least one side of the Class 5 Local Street (13 m reserve) through the development and up to the filling station premises.
Residual impacts:	Slight delays during peak wedding events; minor pedestrian inconvenience if sidewalk use is low.
Cumulative impact post mitigation:	Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Medium (-)**
POST-CONSTRUCTION PHASE	
Potential impact and risk:	Freshwater
Nature of impact:	Loss of highly degraded seep wetland areas identified on site
Extent and duration of impact:	Local; long term
Consequence of impact or risk:	Medium to high, loss of wetland area regardless of degradation level;
Probability of occurrence:	High

Degree to which the impact may cause irreplaceable loss of resources:	Low due to level of degradation
Degree to which the impact can be reversed:	Low
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Continued loss of wetland habitat regardless of degradation level
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High):	Medium
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ The loss of the seriously degraded Seep Wetland 2, along with the loss of portions of Seep Wetland 1, should be compensated for by rehabilitating the Remnant Seep Wetland 1. → No untreated stormwater should enter the Remnant Seep Wetland 1 or "Offset" wetland area. → Avoid encroachment into the remnant Seep Wetland 1 and the Krom River during construction and operational phases. These two areas should be set aside as a No Go for construction and operational phases. → A 20 m buffer area should be implemented around the remnant Seep Wetland 1; and a 10 m buffer around the Krom River (aboveground). The portions of the buffer areas that are located outside of the demarcated construction footprint should be designated as a No-Go area. → Tie into mainline sewage if possible or use fully contained conservancy tanks serviced by truck. No sewage treatment, irrigation or soak-aways should be contemplated. → Allowance must be made for stormwater to be treated in a vegetated detention pond and/or a substantial vegetated swale before release into the Krom River or Remnant Seep Wetland 1. Municipal water supply should be used if possible.

Residual impacts:	N/A
Cumulative impact post mitigation:	Continued wetland loss regardless of level of degradation
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low -ve**
DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	N/A
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 A3 (PREFERRED)

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Socioeconomic impacts** Increased employment opportunities and economic activity vs. potential disruption to local community cohesion.
Nature of impact:	**Positive** (job creation) and **negative** (social disruption due to construction and perceived change in town character).
Extent and duration of impact:	Local (Riebeek-Kasteel and immediate neighbours); short-term (construction phase, ~1-2 years).
Consequence of impact or risk:	Temporary boost to local economy; potential strain on community relations due to wedding venue controversy.
Probability of occurrence:	High (construction jobs certain; community concerns evident from public feedback).
Degree to which the impact may cause irreplaceable loss of resources:	Low (no significant resource loss; social cohesion recoverable with time).
Degree to which the impact can be reversed:	High (economic benefits temporary; social impacts reversible post-construction with engagement).
Indirect impacts:	Increased demand for local services (e.g., suppliers); potential for resident dissatisfaction to affect future projects.
Cumulative impact prior to mitigation:	Moderate (economic gain offset by social tension from wedding venue placement).
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High (balancing economic benefits against community opposition).
Degree to which the impact can be avoided:	Moderate
Degree to which the impact can be managed:	High (through community consultation and construction management).

Degree to which the impact can be mitigated:	High (via local hiring, communication, and design adjustments).
Proposed mitigation:	- Employ local labour; - Engage community through regular updates;
Residual impacts:	Minor lingering community dissatisfaction if wedding venue remains contentious.
Cumulative impact post mitigation	Low (mitigation reduces social tension while retaining economic benefits)
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High (+)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Noise impacts** Disturbance to residents and wildlife from construction activities, e.g., machinery, traffic.
Nature of impact:	Negative
Extent and duration of impact:	Local; Short-term (during construction phase)
Consequence of impact or risk:	Temporary disruption to quality of life, potential annoyance to people in the surroundings
Probability of occurrence:	High (noise inherent to construction activities like earthmoving and building).
Degree to which the impact may cause irreplaceable loss of resources:	Low (no permanent loss; temporary disturbance only).
Degree to which the impact can be reversed:	High (noise ceases upon construction completion; no lasting effects).
Indirect impacts:	Potential reduced appeal for tourism during construction; minor stress on community relations.
Cumulative impact prior to mitigation:	Moderate (combined with dust and traffic, affects liveability during construction).

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (noticeable but temporary disruption in a small-town setting).
Degree to which the impact can be avoided:	Low (construction noise unavoidable, though intensity can be reduced).
Degree to which the impact can be managed:	High (through scheduling and equipment controls).
Degree to which the impact can be mitigated:	High
Proposed mitigation:	- Limit noisy activities to daytime hours (e.g., 7 AM-5 PM); - Use low-noise equipment; - Install temporary sound barriers near sensitive areas (e.g., New Orleans neighbours); - Inform residents of schedule.
Residual impacts:	Minor residual noise during permitted hours; minimal disturbance with compliance.
Cumulative impact post mitigation	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Dust** Air quality degradation from earthworks, vehicle movement, and material handling.
Nature of impact:	Negative
Extent and duration of impact:	Local; Short-term
Consequence of impact or risk:	Temporary health risks (e.g., respiratory irritation), reduced visibility, and nuisance to residents.
Probability of occurrence:	High (dust generation inevitable during dry conditions and earthmoving).

Degree to which the impact may cause irreplaceable loss of resources:	Low (no permanent loss; air quality recovers post-construction).
Degree to which the impact can be reversed:	High (dust settles after construction; no lasting environmental damage).
Indirect impacts:	High (dust settles after construction; no lasting environmental damage).
Cumulative impact prior to mitigation:	Moderate (combined with noise and traffic, impacts air quality and liveability).
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High
Degree to which the impact can be avoided:	Moderate (some dust generation unavoidable, but extent can be minimised).
Degree to which the impact can be managed:	High (through dust suppression techniques).
Degree to which the impact can be mitigated:	High (standard measures effectively reduce dust spread).
Proposed mitigation:	- Regular water spraying on exposed surfaces; - Cover stockpiles; limit vehicle speeds on-site; - Revegetate disturbed areas promptly; - Monitor dust levels near sensitive receptors.
Residual impacts:	Minor dust during dry, windy conditions despite mitigation; quickly dissipates.
Cumulative impact post mitigation	Low (mitigation reduces interaction with other impacts like noise).
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Vegetation loss** Overall loss of ecological connectivity and degradation of the Krom River corridor due to construction; transformation of 11.1

	ha of previously classified critically endangered vegetation which was previously farmed.
Nature of impact:	Negative (vegetation clearing, soil disturbance) and indirect (altered hydrology, invasive species spread)
Extent and duration of impact:	Local; Permanent
Consequence of impact or risk:	Potential loss of degraded ESA functionality, potential further degradation of Krom River ecosystem.
Probability of occurrence:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low (site already transformed, no significant protected species observed).
Degree to which the impact can be reversed:	Medium (rehabilitation possible with effort, especially along Krom River).
Indirect impacts:	Spread of invasive alien plants (e.g., Populus alba) into Krom River; socio-economic benefits from development offset by potential ecological decline.
Cumulative impact prior to mitigation:	Medium - Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
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:	- All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must include the recommendations made in this report. - A suitably qualified Environmental Control Officer must be appointed to monitor the construction phase in terms of the

	EMP and any other conditions pertaining to specialist studies. - The layout of the development footprint should take the sensitivity of the Krom River into account and should aim to establish a suitable corridor along this river system in order to allow for potential rehabilitation of this ecosystem - The olive trees discussed under Heading 7.1 of the Botanical Assessment should be considered for replanting into green belts or gardens. - All listed alien invasive tree species must be removed from the site, while special care must be taken with the removal of white poplar (in order to ensure it does not enter the river system. - Lay-down areas or construction sites must be located at least 30m away from the Krom River corridor; - An integrated waste management approach must be implemented during construction. o Construction related general and hazardous waste may only be disposed of at suitably approved waste disposal sites.
Residual impacts:	Minor degradation of transformed veld, but moderate degradation of the Krom river corridor.
Cumulative impact post mitigation:	Moderate impact on CBA/ESA and river corridor.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Negligible**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**3. Visual impacts** Temporary disruption of scenic quality due to construction activities (e.g., machinery, stockpiles).
Nature of impact:	Negative (construction-related visual impacts and long-term design of the development to blend with townscape).
Extent and duration of impact:	Local (Erf 878 and immediate surrounds, e.g., R311, within 1.2 km); short-term (construction phase, ~1-2 years).
Consequence of impact or risk:	Temporary alteration of scenic views from R311 and nearby areas; reduced aesthetic appeal during construction.

Probability of occurrence:	Medium- High
Degree to which the impact may cause irreplaceable loss of resources:	Low (no permanent loss; scenic quality recoverable post-construction).
Degree to which the impact can be reversed:	High
Indirect impacts:	Potential minor reduction in tourism appeal during construction.
Cumulative impact prior to mitigation:	Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High
Degree to which the impact can be avoided:	Moderate (A3's reduced footprint and single-storey design lessen impact)
Degree to which the impact can be managed:	High – (through construction phasing and screening)
Degree to which the impact can be mitigated:	High (effective measures can minimize visibility).
Proposed mitigation:	- The alternatives should be further explored to better fit the town grid and the site contours. The retention of Riebeek Hill as significant Open Space should be considered. - Architecture: The design of buildings needs to incorporate traditional typologies and details that will make a better fit with this historic town and prevent a modernist intrusion on a heritage landscape. - Landscape Plan: A Landscape Plan has already been prepared and a reference to traditional tree and shrub species is desirable e.g. Oak and Gum trees. - Tree Plan: Trees both on-site and adjacent need to be mapped to ensure their conservation and incorporation into the development, including both traditional heritage tree species like oaks, gums and poplars, and indigenous/endemic species like Wild Olive. - Planting: There is no need to rigidly adhere to any "indigenous-only" kind of botanical extremism in an urban setting, especially one with strong historic connections. - Fencing: Is always a key feature of Architectural/Landscape detailing as it strongly affects

	the edge condition. Subtle, well-detailed, traditional fencing options and colours are preferred. ClearVu fencing is not desirable especially along the R311. - Colouration: Colouration is a key tool to fitting any development into the landscape. There is a strong tendency for monotonous charcoal/grey estate colourations today and black fencing ClearVu fencing. These are not traditional colours in the Cape and detract from both contemporary and historic environments. A subtle combination of scheme colours needs to be developed that will avoid a mass approach to colouration with a high visual impact. - Maintenance: Landscape Maintenance, both private and public, including streetscapes, needs to be integrated into the scheme. - Damage Control: All parties must make every effort to control the destruction of soils and vegetation on site, especially any remnants of natural vegetation. These must not be damaged under any circumstances. - Pollution: Chemical damage by cement mixing directly on the ground and by diesel, etc spills must also be prevented at all costs, as should vandalism of the plants and accidental damage to limbs by workers and machinery. Fires must be prevented also at all costs in all areas. Penalties and incentives should be implemented as can fencing off areas. - Monitoring: Monitoring of the landscape, soils and vegetation during construction is very important and must be attended to regularly. Damage to some is all too inevitable and often irreversible. Adequate indigenous (preferably endemic) vegetation must be planted.	
Residual impacts:	Minor visual disruption during active construction (e.g., machinery visibility from R311); resolves quickly post-completion with A3's traditional design blending into the townscape	
Cumulative impact post mitigation:	Low (mitigation aligns with A3's long-term visual enhancement).	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Medium (-)**	**High (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:	**Archaeological impacts**	

	Disturbance or destruction of archaeological remains (ESA and MSA flakes, chunks, and a historical tile).
Nature of impact:	Negative: physical disturbance due to earthworks, construction, and infrastructure installation.
Extent and duration of impact:	Local; Short-term (during construction phase)
Consequence of impact or risk:	Minor loss of degraded archaeological material graded as Not Conservation Worthy (NCW).
Probability of occurrence:	High (construction will likely disturb surface and subsurface remains).
Degree to which the impact may cause irreplaceable loss of resources:	Low (remains are degraded, isolated, and not significant; no graves or settlements identified).
Degree to which the impact can be reversed:	Low (once disturbed, physical remains cannot be restored to original context).
Indirect impacts:	Potential minor disruption to historical narrative of site, though negligible due to low significance.
Cumulative impact prior to mitigation:	Low (site already transformed by agriculture; additional impact is minimal).
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (due to NCW grading and degraded context).
Degree to which the impact can be avoided:	Low (development footprint covers areas where remains were found).
Degree to which the impact can be managed:	High (monitoring and recording can manage any finds).
Degree to which the impact can be mitigated:	High (simple measures can address low significance remains).
Proposed mitigation:	→ No further archaeological mitigation is required. → No archaeological monitoring is required during construction phase excavations → If any buried human remains are uncovered during construction excavations, these must be immediately

	reported to the archaeologist (J Kaplan 082 3210172. Burials must not be disturbed until inspected by the archaeologist.
Residual impacts:	Negligible (loss of already disturbed, low value remains).
Cumulative impact post mitigation:	Very Low (mitigation ensures minimal additional impact).
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Very low (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Traffic Impact** Increased traffic congestion and safety risks during construction due to delivery vehicles and equipment movement.
Nature of impact:	Negative; Temporary disruption to local traffic flow and potential safety hazards on Church Rd and Fontein St.
Extent and duration of impact:	Local (intersections along Church Rd and Fontein St); Short-term (construction period, likely 1-2 years).
Consequence of impact or risk:	Minor delays and increased risk of accidents at access points; moderate due to wedding venue-related traffic.
Probability of occurrence:	High – Construction activities are inevitable, with additional trips from wedding venue setup.
Degree to which the impact may cause irreplaceable loss of resources:	Low – No loss of physical resources; temporary disruption only.
Degree to which the impact can be reversed:	High – Impacts cease post-construction; roads return to normal operation.
Indirect impacts:	Noise and dust affecting nearby residents; potential delays for public transport users.
Cumulative impact prior to mitigation:	Moderate – Combined effect of construction and background traffic growth by 2028.

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – Manageable but noticeable disruption during peak construction.
Degree to which the impact can be avoided:	Low – Construction traffic is unavoidable, though wedding venue removal in A3 reduces intensity.
Degree to which the impact can be managed:	High – Through scheduling and traffic control measures.
Degree to which the impact can be mitigated:	High – With proper planning and design adherence.
Proposed mitigation:	→ The proposed access off Church Rd should be designed according to the local and provincial guidelines. Attention should be given to sight distances from the access along Church Road; → The proposed access on Fontein Street should be designed according to local guidelines; → The route through the development connecting Church Road in the west with Fontein Street in the east should have a blacktop width of at least 6,0 m. Other internal access roads should have minimum blacktop widths of 5,5 m and bell-mouth radii of 6,0m (minimum 5,0m); → Off-street parking should be provided as per the Swartland Municipality Land Use Planning By-law document; → It is proposed that adequate public transport facilities be provided at the filling station and adjacent retail premises; → It is furthermore proposed that a surfaced sidewalk be provided along at least one side of the Class 5 Local Street (13 m reserve) through the development and up to the filling station premises.
Residual impacts:	Minor delays during peak construction periods.
Cumulative impact post mitigation:	Low – Mitigated to background levels with minimal additional effect.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Medium (-)**
PLANNING, DESIGN AND DEVELOPMENT PHASE	

Potential impact and risk:	Freshwater
Nature of impact:	Loss of highly degraded seep wetland areas identified on site
Extent and duration of impact:	Local; long term
Consequence of impact or risk:	Medium to high, loss of wetland area regardless of degradation level;
Probability of occurrence:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low due to level of degradation
Degree to which the impact can be reversed:	Low
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Continued loss of wetland habitat regardless of degradation level
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ The loss of the seriously degraded Seep Wetland 2, along with the loss of portions of Seep Wetland 1, should be compensated for by rehabilitating the Remnant Seep Wetland 1. → No untreated stormwater should enter the Remnant Seep Wetland 1 or "Offset" wetland area. → Avoid encroachment into the remnant Seep Wetland 1 and the Krom River during construction and operational phases. These two areas should be set aside as a No Go for construction and operational phases.

	→ A 20 m buffer area should be implemented around the remnant Seep Wetland 1; and a 10 m buffer around the Krom River (aboveground). The portions of the buffer areas that are located outside of the demarcated construction footprint should be designated as a No-Go area. → Tie into mainline sewage if possible or use fully contained conservancy tanks serviced by truck. No sewage treatment, irrigation or soak-aways should be contemplated. → Allowance must be made for stormwater to be treated in a vegetated detention pond and/or a substantial vegetated swale before release into the Krom River or Remnant Seep Wetland 1. → Municipal water supply should be used if possible.
Residual impacts:	N/A
Cumulative impact post mitigation:	Continued wetland loss regardless of level of degradation
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low -ve**
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**Socioeconomic impacts** Tourism and economic growth of the region vs. long-term change to town character and local lifestyle.
Nature of impact:	Positive (revenue, jobs)
Extent and duration of impact:	Local to regional (visitors from beyond Riebeek-Kasteel); long-term (duration of venue operation).
Consequence of impact or risk:	Economic upliftment for businesses; potential overburdening of infrastructure and resident discontent.
Probability of occurrence:	High (wedding venue likely to attract visitors; public concerns already noted).
Degree to which the impact may cause irreplaceable loss of resources:	Medium (loss of town's tranquil character difficult to quantify or replace).

Degree to which the impact can be reversed:	Moderate
Indirect impacts:	Growth in hospitality sector; potential property value changes;
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:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	Moderate
Proposed mitigation:	- Employ local individuals during the operation phase.
Residual impacts:	Reduced community resistance due to job creation; manageable infrastructure load if mitigations are implemented effectively.
Cumulative impact post mitigation:	Medium-High (economic benefits remain, but community and infrastructure strain are reduced).
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High (+)**
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**Ecological impacts** Ongoing degradation of the Krom River corridor and increased invasive alien plant infestation.
Nature of impact:	Negative
Extent and duration of impact:	Local (Krom River corridor and 11.1 ha site); Permanent unless actively managed.

Consequence of impact or risk:	Reduced ecological connectivity and potential further degradation of the CBA/ESA along the Krom River.
Probability of occurrence:	Probable (depends on maintenance practices; high if no alien control is implemented).
Degree to which the impact may cause irreplaceable loss of resources:	High
Degree to which the impact can be reversed:	Medium
Indirect impacts:	Spread of invasive species downstream, affecting broader river ecology; increased veld fire risk.
Cumulative impact prior to mitigation:	Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Medium – Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	- All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must include the recommendations made in this report. - A suitably qualified Environmental Control Officer must be appointed to monitor the construction phase in terms of the EMP and any other conditions pertaining to specialist studies. - The layout of the development footprint should take the sensitivity of the Krom River into account and should aim to establish a suitable corridor along this river system in order to allow for potential rehabilitation of this ecosystem – included in the preferred layout - The olive trees discussed under Heading 7.1 of the Botanical Assessment should be considered for replanting into green belts or gardens.

	- All listed alien invasive tree species must be removed from the site, while special care must be taken with the removal of white poplar (in order to ensure it does not enter the river system. - Lay-down areas or construction sites must be located at least 30m away from the Krom River corridor; - An integrated waste management approach must be implemented during construction. o Construction related general and hazardous waste may only be disposed of at suitably approved waste disposal sites.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Very -Low (-)**
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**Visual impacts** Ongoing visual prominence of the single residential development on the top hill, competing with the church steeple and altering the town's scenic identity.
Nature of impact:	Negative – Permanent alteration of key sight lines (e.g., R311 southern approach, R46, Bothmanskloof Pass) and introduction of a new, dominant landmark.
Extent and duration of impact:	Local to regional (visible from R311, R46, and elevated points up to 1.8 km away); Permanent (for the lifespan of the development).
Consequence of impact or risk:	Erosion of the historic townscape's landmark qualities, reduced scenic appeal, and potential conflict with the town's cultural identity.
Probability of occurrence:	Definite - The venue's hilltop location ensures visibility from sensitive viewpoints as noted in the VIA.

Degree to which the impact may cause irreplaceable loss of resources:	High – Loss of visual heritage value, though not a tangible resource, is significant and difficult to restore.
Degree to which the impact can be reversed:	Low
Indirect impacts:	Possible decline in visitor experience and local property values due to diminished scenic quality.
Cumulative impact prior to mitigation:	High – Reinforces existing visual intrusions and competes with established landmarks over time
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very High – High sensitivity of views (e.g., R311 gateway) and low VAC of the crest amplify the impact.
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium – Lighting control and landscaping can reduce prominence, but not the venue's inherent visibility.
Degree to which the impact can be mitigated:	Medium – Screening with vegetation and subtle design can lessen, but not eliminate, the impact.
Proposed mitigation:	→ Site Development Plan: Alternative 2 or similar is to be preferred over Alternative 3 and should be further explored to better fit the town grid and the site contours. The retention of Riebeek Hill as significant Open Space should be considered. → Architecture: The design of buildings needs to incorporate traditional typologies and details that will make a better fit with this historic town and prevent a modernist intrusion on a heritage landscape. → Landscape Plan: A Landscape Plan has already been prepared and a reference to traditional tree and shrub species is desirable e.g. Oak and Gum trees. → Tree Plan: Trees both on-site and adjacent need to be mapped to ensure their conservation and incorporation into the development, including both traditional heritage tree species like oaks, gums and poplars, and indigenous/endemic species like Wild Olive. → Planting: There is no need to rigidly adhere to any "indigenous-only" kind of botanical extremism in an urban setting, especially one with strong historic connections.

	→ Fencing: Is always a key feature of Architectural/Landscape detailing as it strongly affects the edge condition. Subtle, well-detailed, traditional fencing options and colours are preferred. ClearVu fencing is not desirable especially along the R311. → Colouration: Colouration is a key tool to fitting any development into the landscape. There is a strong tendency for monotonous charcoal/grey estate colourations today and black fencing ClearVu fencing. These are not traditional colours in the Cape and detract from both contemporary and historic environments. A subtle combination of scheme colours needs to be developed that will avoid a mass approach to colouration with a high visual impact. → Maintenance: Landscape Maintenance, both private and public, including streetscapes, needs to be integrated into the scheme. → Damage Control: All parties must make every effort to control the destruction of soils and vegetation on site, especially any remnants of natural vegetation. These must not be damaged under any circumstances. → Pollution: Chemical damage by cement mixing directly on the ground and by diesel, etc spills must also be prevented at all costs, as should vandalism of the plants and accidental damage to limbs by workers and machinery. Fires must be prevented also at all costs in all areas. Penalties and incentives should be implemented as can fencing off areas. → Monitoring: Monitoring of the landscape, soils and vegetation during construction is very important and must be attended to regularly. Damage to some is all too inevitable and often irreversible. Adequate indigenous (preferably endemic) vegetation must be planted. → Lighting: Lighting should be minimised and carefully controlled as part of the project's management plan. The use of green energy fittings and concepts should be encouraged and lighting developed with sensitivity to the rural landscape. → Landscape Maintenance: must be carried out at all times in line with these recommendations to help keep the scheme green and encouraging local biodiversity.
Residual impacts:	Persistent alteration of the ridge line and partial competition with the church steeple.
Cumulative impact post mitigation:	Medium-High – Mitigation reduces severity, but cumulative scenic degradation remains.

Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Medium (-)**	**High (-)**
POST-CONSTRUCTION PHASE		
Potential impact and risk:	**Traffic Impact** Increased traffic volumes and potential congestion at intersections due to wedding venue and mixed-use components.	
Nature of impact:	Negative – Added trips (234 AM, 577 PM per TIA) with higher peaks from wedding events.	
Extent and duration of impact:	Local (Church Rd, Fontein St intersections); Long-term (duration of development operation).	
Consequence of impact or risk:	Moderate delays - with worse peak delays from wedding venue events; safety risks at access points.	
Probability of occurrence:	High – Wedding venue and mixed-use elements ensure consistent trip generation.	
Degree to which the impact may cause irreplaceable loss of resources:	Low – No physical resource loss; impacts are operational.	
Degree to which the impact can be reversed:	High – Traffic impacts reversible if wedding venue use is ceased	
Indirect impacts:	Increased demand for public transport; pedestrian safety risks without sidewalks; noise from wedding events.	
Cumulative impact prior to mitigation:	Moderate – Background 2028 traffic plus development trips, exacerbated by wedding venue peak events.	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High – Noticeable impact on service levels, especially during wedding events.	
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:	Low
Proposed mitigation:	→ The proposed access off Church Rd should be designed according to the local and provincial guidelines. Attention should be given to sight distances from the access along Church Road; → The proposed access on Fontein Street should be designed according to local guidelines; → The route through the development connecting Church Road in the west with Fontein Street in the east should have a blacktop width of at least 6,0 m. Other internal access roads should have minimum blacktop widths of 5,5 m and bell-mouth radii of 6,0m (minimum 5,0m); → Off-street parking should be provided as per the Swartland Municipality Land Use Planning By-law document; → It is proposed that adequate public transport facilities be provided at the filling station and adjacent retail premises; → It is furthermore proposed that a surfaced sidewalk be provided along at least one side of the Class 5 Local Street (13 m reserve) through the development and up to the filling station premises.
Residual impacts:	Slight delays during peak wedding events; minor pedestrian inconvenience if sidewalk use is low.
Cumulative impact post mitigation:	Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**
POST-CONSTRUCTION PHASE	
Potential impact and risk:	Freshwater
Nature of impact:	Loss of highly degraded seep wetland areas identified on site
Extent and duration of impact:	Local; long term

Consequence of impact or risk:	Medium to high, loss of wetland area regardless of degradation level;
Probability of occurrence:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low due to level of degradation
Degree to which the impact can be reversed:	Low
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Continued loss of wetland habitat regardless of degradation level
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High):	Medium
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ The loss of the seriously degraded Seep Wetland 2, along with the loss of portions of Seep Wetland 1, should be compensated for by rehabilitating the Remnant Seep Wetland 1. → No untreated stormwater should enter the Remnant Seep Wetland 1 or "Offset" wetland area. → Avoid encroachment into the remnant Seep Wetland 1 and the Krom River during construction and operational phases. These two areas should be set aside as a No Go for construction and operational phases. → A 20 m buffer area should be implemented around the remnant Seep Wetland 1; and a 10 m buffer around the Krom River (aboveground). The portions of the buffer areas that are located outside of the demarcated construction footprint should be designated as a No-Go area. → Tie into mainline sewage if possible or use fully contained conservancy tanks serviced by truck. No sewage treatment, irrigation or soak-aways should be contemplated.

	→ Allowance must be made for stormwater to be treated in a vegetated detention pond and/or a substantial vegetated swale before release into the Krom River or Remnant Seep Wetland 1. Municipal water supply should be used if possible.
Residual impacts:	N/A
Cumulative impact post mitigation:	Continued wetland loss regardless of level of degradation
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low -ve**
DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	N/A
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 4: NO-GO

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Vegetation clearance** Status quo remains
Nature of impact:	Positive; No additional vegetation clearance, no opportunity to improve the current status of the site
Extent and duration of impact:	Local; Permanent as long as the site remains undeveloped.
Consequence of impact or risk:	Prevents habitat loss and land degradation
Probability of occurrence:	Certain as no development will proceed.
Degree to which the impact may cause irreplaceable loss of resources:	None; preserves existing resources
Degree to which the impact can be reversed:	N/A
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	N/A
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	N/A
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	N/A
Residual impacts:	N/A
Cumulative impact post mitigation:	N/A
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High +ve**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**Socioeconomic impacts** No job creation, income generation, or local economic stimulation.

Nature of impact:	Negative, as no development would mean no job creation, income generation, or local economic stimulation. Positive, as the rural and small-town character is preserved, which may benefit tourism reliant on natural and cultural landscapes
Extent and duration of impact:	Local; Long-term as the status quo remains
Consequence of impact or risk:	Moderate; limits economic growth and employment opportunities for local communities but preserves existing land use patterns.
Probability of occurrence:	Certain, as no development will proceed.
Degree to which the impact may cause irreplaceable loss of resources:	Low; socioeconomic opportunities are lost but natural and cultural resources remain intact
Degree to which the impact can be reversed:	Reversible, if the development is considered in future.
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	N/A
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	N/A
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	N/A
Residual impacts:	N/A
Cumulative impact post mitigation:	N/A
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High -ve**
POST-CONSTRUCTION	
Potential impact and risk:	**Socioeconomic impacts**
Nature of impact:	Negative, as no long-term employment opportunities, increased property values, or enhanced municipal revenues will result from the non-development. Positive, as local lifestyle and sense of place remain unchanged, benefiting tourism focused on natural and cultural appeal.
Extent and duration of impact:	Local; long-term as the status quo is maintained indefinitely.
Consequence of impact or risk:	Moderate; limits potential economic growth but preserves the rural character.
Probability of occurrence:	Certain, as no development will proceed.
Degree to which the impact may cause irreplaceable loss of resources:	Low; no socioeconomic resources are lost but potential economic gains are foregone.
Degree to which the impact can be reversed:	Reversible if development is reconsidered in the future.
Indirect impacts:	Reduced potential for local business growth and infrastructure development. Potential stagnation in local service demand and investment.
Cumulative impact prior to mitigation:	Negative cumulative impact due to continued limited economic activity and employment.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (negative impact).

Degree to which the impact can be avoided:	Not applicable, as the impact is inherent to the NO-GO alternative.
Degree to which the impact can be managed:	Low, due to limited options for stimulating the local economy without development.
Degree to which the impact can be mitigated:	Low to moderate, depending on the success of alternative economic strategies.
Proposed mitigation:	N/A
Residual impacts:	N/A
Cumulative impact post mitigation:	N/A
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Medium (-)**

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

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

BOTANICAL ASSESSMENT FINDINGS

The Botanical Assessment conducted for the proposed development on Erf 878 (<11.1 ha), located within the urban edge of Riebeek Kasteel, provides a detailed evaluation of the site's vegetation and ecological context.
Key findings of the assessment include:

Vegetation Type and Conservation Status

→ The site is situated within Swartland Shale Renosterveld, a critically endangered vegetation type identified by the SA Vegetation Mapping (2018). Approximately 90% of this vegetation type has been transformed, against a conservation target of 26%, rendering these targets unachievable.
→ The site itself is entirely degraded due to historical and ongoing agricultural activities, primarily dryland cultivation of commercial crops spanning over a century. Although cultivation ceased 10–15 years ago (or longer), the land has been used for grazing by small antelope (e.g., springbok), with some hardy pioneer species re-establishing in previously disturbed areas.

Site Condition and Development Footprint

- The proposed development will transform approximately 11.1 ha of degraded natural veld into urban erven, with the footprint confined almost exclusively to already transformed areas exhibiting little potential for rehabilitation.
- No unique habitats (e.g., heuweltjies) or protected/endangered plant species were observed. The most notable botanical feature is the presence of a few young *Olea europaea* (wild olive) trees at the foot of a small hill.

Critical Biodiversity Areas (CBA) and Ecological Support Areas (ESA)

- According to the 2017 Western Cape Biodiversity Spatial Plan (WCBSP), a small area on the hilltop is designated as a CBA, and the Krom River, bordering the site to the north, is identified as an ESA. However, site inspections confirmed that both the CBA and ESA are degraded, with no undisturbed natural veld remaining.

- The Krom River, while compromised by surrounding urban and agricultural impacts, represents the only potential ecological corridor. Google imagery suggests that the section adjacent to Erf 878 is relatively better preserved compared to other nearby stretches, though still degraded.

Alien Vegetation

Alien invasive species, including *Acacia mearnsii* (black wattle), *Melia azedarach* (syringa), and *Populus alba* (white poplar), were observed. The white poplar, located near the Krom River, poses a significant risk due to its potential to form dense stands via root suckers, which could obstruct water channels, increase siltation, and reduce stream flow.

Impact Assessment

- The proposed footprint will be relatively small (<12 ha) within the urban edge and impacting only on transformed natural veld.
- The No-Go option is not likely to result in a "no-impact" scenario, for it will have a negative socio-economic impact (and slow degradation may still continue).
- Without mitigation, the development's cumulative impact is rated as Medium-Low, primarily due to potential effects on the Krom River, CBA, and ESA. With appropriate mitigation, this can be reduced to **Very Low.**
- The "No-Go" option would not result in a "no-impact" scenario, as it would entail negative socio-economic consequences while degradation of the site may persist.

Impact Management Measures

The following general mitigation actions should also be implemented:

→ All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must include the recommendations made in this report.
→ A suitably qualified Environmental Control Officer must be appointed to monitor the construction phase in terms of the EMP and any other conditions pertaining to specialist studies.
→ The layout of the development footprint should take the sensitivity of the Krom River into account and should aim to establish a suitable corridor along this river system in order to allow for potential rehabilitation of this ecosystem.
→ The olive trees discussed under Heading 7.1 should be considered for replanting into green belts or gardens.
→ All listed alien invasive tree species must be removed from the site, while special care must be taken with the removal of white poplar (in order to ensure it does not enter the river system.
→ Lay-down areas or construction sites must be located at least 30m away from the Krom River corridor;
→ An integrated waste management approach must be implemented during construction.
  - Construction related general and hazardous waste may only be disposed of at suitably approved waste disposal sites.

HERITAGE IMPACT ASSESSMENT

Archaeological Findings

A field study conducted revealed:

→ A small number of Early Stone Age (ESA) and Middle Stone Age (MSA) flakes and chunks in a degraded and disturbed context, either embedded in gravel or on the surface of a gravel road circling the site.
→ A few isolated stone pieces were identified in the strips of land that have been bushcut near a small stream/wetland.
→ No formally retouched tools (e.g., bifaces, points) or evidence of early human occupation/settlement.
→ A fragment of a late 19th/early 20th-century blue and white willow pattern glazed floor tile found among rubble in the northeastern site portion (Point 029).

→ Grading: Archaeological remains are deemed Not Conservation Worthy due to their small number, isolation, and disturbed context.
→ Graves: No graves were identified during the assessment.

Anticipated Impact

The site has been heavily transformed by historical agriculture, and the anticipated impact on tangible archaeological heritage resources is expected to be very low.

Impact Management Measures

Given the low significance and degraded context of the findings:

- No specific conservation or mitigation measures are recommended for the archaeological remains identified during the site visit.
- The lack of graves or significant occupation evidence eliminates the need for further protective actions in those respects.

Visual Impact Assessment

Key Issues

1. The site lies on the R311 and is best seen from this major route.
2. The site is not easily seen from the town of Riebeek-Kasteel.
3. The site is split between a lower/northern portion and an upper/southern portion.
4. The historical grid of Riebeek-Kasteel remains intact.
5. Ridgelines constrain views of the site from the south and north.
6. Land use constrains views of the site from the east/town as does the grid.

Assessment

The revised layout and landscaping with careful consideration has created a scheme that blends well into the old village as it connects onto the prominent R311 cultural route. Sometimes the white/light-coloured walls seem a bit bright and could be toned down to a greener option that will blend in better with the lush vegetation and general leafiness of the landscape.

Mitigation Recommendations

→ Site Development Plan: Alternative 2 or similar is to be preferred over Alternative 3 and should be further explored to better fit the town grid and the site contours. The retention of Riebeek Hill as significant Open Space should be considered.
→ Architecture: The design of buildings needs to incorporate traditional typologies and details that will make a better fit with this historic town and prevent a modernist intrusion on a heritage landscape.
→ Landscape Plan: A Landscape Plan has already been prepared and a reference to traditional tree and shrub species is desirable e.g. Oak and Gum trees.
→ Tree Plan: Trees both on-site and adjacent need to be mapped to ensure their conservation and incorporation into the development, including both traditional heritage tree species like oaks, gums and poplars, and indigenous/endemic species like Wild Olive.
→ Planting: There is no need to rigidly adhere to any “indigenous-only” kind of botanical extremism in an urban setting, especially one with strong historic connections.
→ Fencing: Is always a key feature of Architectural/Landscape detailing as it strongly affects the edge condition. Subtle, well-detailed, traditional fencing options and colours are preferred. ClearVu fencing is not desirable especially along the R311.

- → Colouration: Colouration is a key tool to fitting any development into the landscape. There is a strong tendency for monotonous charcoal/grey estate colourations today and black fencing ClearVu fencing. These are not traditional colours in the Cape and detract from both contemporary and historic environments. A subtle combination of scheme colours needs to be developed that will avoid a mass approach to colouration with a high visual impact.
- → Maintenance: Landscape Maintenance, both private and public, including streetscapes, needs to be integrated into the scheme.
- → Damage Control: All parties must make every effort to control the destruction of soils and vegetation on site, especially any remnants of natural vegetation. These must not be damaged under any circumstances.
- → Pollution: Chemical damage by cement mixing directly on the ground and by diesel, etc spills must also be prevented at all costs, as should vandalism of the plants and accidental damage to limbs by workers and machinery. Fires must be prevented also at all costs in all areas. Penalties and incentives should be implemented as can fencing off areas.
- → Monitoring: Monitoring of the landscape, soils and vegetation during construction is very important and must be attended to regularly. Damage to some is all too inevitable and often irreversible. Adequate indigenous (preferably endemic) vegetation must be planted.
- → Lighting: Lighting should be minimised and carefully controlled as part of the project's management plan. The use of green energy fittings and concepts should be encouraged and lighting developed with sensitivity to the rural landscape.
- → Landscape Maintenance: must be carried out at all times in line with these recommendations to help keep the scheme green and encouraging local biodiversity.

TRAFFIC IMPACT ASSESSMENT

It can be concluded that the proposed subdivision and rezoning of Erf 878, Riebeeck Kasteel will have a moderate traffic impact. Other findings are summarised as follows:

- → The application is for the subdivision and rezoning of Erf 878 to include a residential component entailing single residential, town housing and apartments. A retail component and frail care centre are also proposed;
- → The development will have the potential to generate a total of 206 trips (90 in; 116 out) during the AM peak hour and 589 trips (264 in; 325 out) during the PM peak hour;
- → The development will obtain access off Church Rd via an unsignalised full intersection approximately 690 m north of the R46 / Church Rd intersection, a left-in-only access off Church Rd approximately 100 m south of the Church Rd / Main St intersection and an unsignalised full intersection on Fontein St approximately 150 m south of the Fontein St / Plein St intersection;
- → Newly formed intersections will operate at good levels of service during the AM and PM peak hours;
- → The retail component of the development will attract public transport trips;
- → The Class 5 Local Street (13 m reserve) through the development and up to the commercial premises is expected to be the primary pedestrian route through the development.

Recommendations

The recommendations made in the transport impact assessment are summarized below.

- → The proposed access off Church Rd should be designed according to the local and provincial guidelines. Attention should be given to sight distances from the access along Church Road
- → The proposed access on Fontein Street should be designed according to local guidelines
- → The route through the development connecting Church Road in the west with Fontein Street in the east should have a blacktop width of at least 6,0 m. Other internal access roads should have minimum blacktop widths of 5,5 m and bell-mouth radii of 6,0m (minimum 5,0m)
- → Off-street parking should be provided as per the Swartland Municipality Land Use Planning By-law document
- → It is proposed that adequate public transport facilities should be provided at the retail premises

→ It is furthermore proposed that a surfaced sidewalk be provided along at least one side of the Class 5 Local Street (13 m reserve) through the development and up to the retail premises.

FRESHWATER IMPACT ASSESSMENT

Following the aquatic biodiversity assessment of the proposed site on the 20th of February 2025, the Krom River was confirmed to intersect the northern boundary of the proposed development site. In addition, two seep wetland systems were identified onsite, both of which are sustained by groundwater emergence in the form of springs. Seep wetland 1 historically would have extended to the east, downslope of the site, but the development of roads and residential areas has resulted in canalisation of this flow.

Several patches of artificial seepage dominated by *Pennisetum clandestinum* (kikuyu grass) were observed, primarily along the western boundary. The artificial nature and negligible ecological importance / sensitivity of these features resulted in their exclusion from the assessment.

Given the confirmed presence of onsite watercourses which are likely to be impacted by the proposed development, the site was determined to be of "Very High" aquatic sensitivity. If the specialist determines that the Aquatic Biodiversity sensitivity of the site is "Very High", the GN320 of 2020 requires that a full aquatic biodiversity impact assessment must be submitted as set out by the National Environmental Management Act (NEMA) (Act No. 107 of 1998) Regulations of 2020 (as amended) (GN R. 320 of 2020).

In this impact assessment, the delineated watercourses were assessed using current best practice assessment methodologies to determine the Present Ecological State (PES), Index of Habitat Integrity (IHI), Ecological Importance and Sensitivity (EIS), the contribution to Wetland Ecosystem Services (WES), and Recommended Ecological Category (REC) metrics.

Three alternative layouts were considered for the proposed development on the site. Aquatic biodiversity impacts associated with the development were identified and assessed using both an impact assessment methodology compliant with NEMA requirements and the Risk Assessment Matrix (RAM) prescribed by GN4167 of 2023. The seven potential aquatic impacts were assessed first without, and then with, application of mitigation measures, for the three proposed Alternatives.

Six out of seven of the post-mitigation scores fell within the within the "Low" impact categories. Wetland loss received the highest impact significance score, which fell within the 'Medium' category. Ordinarily, wetland loss would fall within the 'high' category, but the limited area of wetland loss (+- 1 Ha) and the degraded nature of the wetland areas to be lost, has reduced the impact significance.

Although it is unknown whether the development area would be further developed in future, it is assumed that the site would remain as is. The No-Go option would result in the continuation of impact to the watercourses due to onsite and adjacent land uses – and would therefore still result in negative impact to the delineated watercourses.

The Moderate risk rating confirms that a Water Use Licence will be required for this project due to the encroachment of the development into the onsite seep wetland areas.

The key recommendations therefore are:

- → The loss of the seriously degraded Seep Wetland 2, along with the loss of portions of Seep Wetland 1, should be compensated for by rehabilitating the Remnant Seep Wetland 1.
- → No untreated stormwater should enter the Remnant Seep Wetland 1 or "Offset" wetland area
- → Avoid encroachment into the remnant Seep Wetland 1 and the Krom River during construction and operational phases. These two areas should be set aside as a No Go for construction and operational phases.

- → A 20 m buffer area should be implemented around the remnant Seep Wetland 1; and a 10 m buffer around the Krom River (aboveground). The portions of the buffer areas that are located outside of the demarcated construction footprint should be designated as a No-Go area.
- → Tie into mainline sewage if possible or use fully contained conservancy tanks serviced by truck. No sewage treatment, irrigation or soak-aways should be contemplated.
- → Allowance must be made for stormwater to be treated in a vegetated detention pond and/or a substantial vegetated swale before release into the Krom River or Remnant Seep Wetland 1.
- → Municipal water supply should be used if possible
- → Alternative 1 and 2 both included a service station within proximity to Seep 1, while Alternative 1 also included a wedding venue on top of the hillock on the site. Alternative 3, which excludes the fuel station located close to Seep 1 is preferred from an aquatic perspective.

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

Below is a consolidated list of impact management measures identified by all specialists (Botanical Assessment, Freshwater Impact Assessment, Heritage Impact Assessment, Visual Impact Assessment, and Traffic Impact Assessment) that will be included in the Environmental Management Programme (EMPr) for the proposed development of Alternative 3 on Erf 878, Riebeek Kasteel:

BOTANICAL ASSESSMENT

The following general mitigation actions should be implemented:

- → All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must include the recommendations made in this report.
- → A suitably qualified Environmental Control Officer must be appointed to monitor the construction phase in terms of the EMP and any other conditions pertaining to specialist studies.
- → The layout of the development footprint should take the sensitivity of the Krom River into account and should aim to establish a suitable corridor along this river system in order to allow for potential rehabilitation of this ecosystem
- → The olive trees discussed under Heading 7.1 should be considered for replanting into green belts or gardens.
- → All listed alien invasive tree species must be removed from the site, while special care must be taken with the removal of white poplar (in order to ensure it does not enter the river system.
- → Lay-down areas or construction sites must be located at least 30m away from the Krom River corridor;
- → An integrated waste management approach must be implemented during construction.
    - o Construction related general and hazardous waste may only be disposed of at suitably approved waste disposal sites.

TRAFFIC IMPACT ASSESSMENT

The recommendations made in the transport impact assessment are summarised below.

- → The proposed access off Church Rd should be designed according to the local and provincial guidelines. Attention should be given to sight distances from the access along Church Road;
- → The proposed access on Fontein Street should be designed according to local guidelines;
- → The route through the development connecting Church Road in the west with Fontein Street in the east should have a blacktop width of at least 6,0 m. Other internal access roads should have minimum blacktop widths of 5,5 m and bell-mouth radii of 6,0m (minimum 5,0m);
- → Off-street parking should be provided as per the Swartland Municipality Land Use Planning By-law document;
- → It is proposed that adequate public transport facilities be provided at the filling station and adjacent retail premises;

→ It is furthermore proposed that a surfaced sidewalk be provided along at least one side of the Class 5 Local Street (13 m reserve) through the development and up to the filling station premises.

HERITAGE IMPACT ASSESSMENT

The Heritage Impact Assessment integrates the Visual Impact Assessment and Archaeological Impact and their recommendations are described below:

Visual Impact Assessment

Mitigation measures

- → Site Development Plan: Alternative 2 or similar is to be preferred over Alternative 3 and should be further explored to better fit the town grid and the site contours. The retention of Riebeek Hill as significant Open Space should be considered.
- → Architecture: The design of buildings needs to incorporate traditional typologies and details that will make a better fit with this historic town and prevent a modernist intrusion on a heritage landscape.
- → Landscape Plan: A Landscape Plan has already been prepared and a reference to traditional tree and shrub species is desirable e.g. Oak and Gum trees.
- → Tree Plan: Trees both on-site and adjacent need to be mapped to ensure their conservation and incorporation into the development, including both traditional heritage tree species like oaks, gums and poplars, and indigenous/endemic species like Wild Olive.
- → Planting: There is no need to rigidly adhere to any "indigenous-only" kind of botanical extremism in an urban setting, especially one with strong historic connections.
- → Fencing: Is always a key feature of Architectural/Landscape detailing as it strongly affects the edge condition. Subtle, well-detailed, traditional fencing options and colours are preferred. ClearVu fencing is not desirable especially along the R311.
- → Colouration: Colouration is a key tool to fitting any development into the landscape. There is a strong tendency for monotonous charcoal/grey estate colourations today and black fencing ClearVu fencing. These are not traditional colours in the Cape and detract from both contemporary and historic environments. A subtle combination of scheme colours needs to be developed that will avoid a mass approach to colouration with a high visual impact.
- → Maintenance: Landscape Maintenance, both private and public, including streetscapes, needs to be integrated into the scheme.
- → Damage Control: All parties must make every effort to control the destruction of soils and vegetation on site, especially any remnants of natural vegetation. These must not be damaged under any circumstances.
- → Pollution: Chemical damage by cement mixing directly on the ground and by diesel, etc spills must also be prevented at all costs, as should vandalism of the plants and accidental damage to limbs by workers and machinery. Fires must be prevented also at all costs in all areas. Penalties and incentives should be implemented as can fencing off areas.
- → Monitoring: Monitoring of the landscape, soils and vegetation during construction is very important and must be attended to regularly. Damage to some is all too inevitable and often irreversible. Adequate indigenous (preferably endemic) vegetation must be planted.
- → Lighting: Lighting should be minimised and carefully controlled as part of the project's management plan. The use of green energy fittings and concepts should be encouraged and lighting developed with sensitivity to the rural landscape.
- → Landscape Maintenance: must be carried out at all times in line with these recommendations to help keep the scheme green and encouraging local biodiversity.

ARCHAEOLOGICAL IMPACT ASSESSMENT

- → No further archaeological mitigation is required.
- → No archaeological monitoring is required during construction phase excavations

→ If any buried human remains are uncovered during construction excavations, these must be immediately reported to the archaeologist (J Kaplan 082 3210172. Burials must not be disturbed until inspected by the archaeologist.

FRESHWATER IMPACT ASSESSMENT

→ The loss of the seriously degraded Seep Wetland 2, along with the loss of portions of Seep Wetland 1, should be compensated for by rehabilitating the Remnant Seep Wetland 1.
→ No untreated stormwater should enter the Remnant Seep Wetland 1 or "Offset" wetland area
→ Avoid encroachment into the remnant Seep Wetland 1 and the Krom River during construction and operational phases. These two areas should be set aside as a No Go for construction and operational phases.
→ A 20 m buffer area should be implemented around the remnant Seep Wetland 1; and a 10 m buffer around the Krom River (aboveground). The portions of the buffer areas that are located outside of the demarcated construction footprint should be designated as a No-Go area.
→ Tie into mainline sewage if possible or use fully contained conservancy tanks serviced by truck. No sewage treatment, irrigation or soak-aways should be contemplated.
→ Allowance must be made for stormwater to be treated in a vegetated detention pond and/or a substantial vegetated swale before release into the Krom River or Remnant Seep Wetland 1.
→ Municipal water supply should be used if possible
→ Alternative 1 and 2 both included a service station within proximity to Seep 1, while Alternative 1 also included a wedding venue on top of the hillock on the site. Alternative 3, which excludes the fuel station located close to Seep 1 is preferred from an aquatic perspective.

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.

Below is an explanation of how the proposed development of Alternative 3 on Erf 878, Riebeek Kasteel, will impact the surrounding communities. This analysis draws on the specialist assessments (Botanical, Heritage, Visual, and Traffic Impact Assessments), public feedback, and the socioeconomic context inferred from the project's mixed-use nature (residential, retail, institutional). It considers both positive and negative impacts across the planning, construction, and operational phases, focusing on the immediate neighbours (e.g., New Orleans), the broader Riebeek Kasteel community, and nearby areas along the R311.

Impact of the Proposed Development (Alternative 3) on Surrounding Communities

The proposed development of Alternative 3 on Erf 878 will have a multifaceted impact on the surrounding communities, encompassing economic, social, environmental, and infrastructural dimensions. As a mixed-use project within the urban edge of Riebeek Kasteel, featuring 54 low-density residential erven, 47 town housing erven, flats, a frail care institution, retail spaces, and significant open space, Alternative 3 balances community benefits with manageable disruptions, shaped by its refined design and mitigation measures.

Positive Impacts

Economic Opportunities and Growth

Construction Phase

The development will generate temporary employment opportunities during the 1–2-year construction period, particularly for local labour, as recommended in the EMPr. This boosts income for Riebeek Kasteel residents and stimulates demand for local suppliers (e.g., building materials, services), providing a short-term economic uplift.

Operational Phase

The retail component and frail care facility will create permanent jobs (e.g., shop staff, caregivers), enhancing long-term economic activity. The Traffic Impact Assessment (TIA) estimates 206 AM and 589 PM peak hour trips, indicating increased economic interaction as residents and visitors access these amenities. This aligns with the Swartland Municipality SDF's vision for residential growth, potentially attracting new residents and supporting local businesses along the R311 corridor.

Housing and Community Services:

Alternative A3 provides diverse housing options (low-density erven, town housing, flats), addressing housing needs for various demographics, including families, retirees, and lower-income groups. The frail care institution meets a growing demand in an aging population, offering a valuable service to the community and reducing pressure on regional facilities. These additions enhance Riebeek Kasteel's appeal as a residential hub, potentially stabilizing property values and fostering community growth.

Improved Infrastructure and Access:

The TIA confirms that new intersections (e.g., off Church Rd and Fontein St) will operate at good levels of service, improving connectivity for surrounding areas. The provision of a surfaced sidewalk along the Class 5 Local Street and public transport facilities at the retail premises will enhance pedestrian safety and accessibility, benefiting residents near New Orleans and along the R311. These upgrades integrate Erf 878 into the town's fabric without overwhelming existing infrastructure, as capacity exists per municipal systems.

Visual and Cultural Integration

The Visual Impact Assessment (VIA) highlights that Alternative A3 design single-storey structures, traditional typologies, and open space on Riebeek Hill—blends with the historical grid and R311 cultural route. By preserving the sight line to the church steeple and avoiding the wedding venue's prominence (as in Alternative A1), Alternative A3 maintains the town's sense of place, a key concern from public feedback. This benefits the broader community by reinforcing Riebeek Kasteel's scenic and historic identity, valued by residents and tourists alike.

<u>Negative Impacts</u>

Construction Phase Impacts

Noise and Dust

Construction activities (e.g., earthmoving, machinery) will generate noise and dust, impacting immediate neighbours like New Orleans most acutely. The impact assessment rates these as Medium pre-mitigation, causing temporary annoyance, reduced quality of life, and potential health concerns (e.g., respiratory irritation). While short-term (~1-2 years), these effects could strain community relations, especially for those along the R311 and Fontein St.

Traffic Congestion

The TIA notes moderate traffic impacts during construction due to delivery vehicles, with minor delays and safety risks at Church Rd and Fontein St intersections. This could inconvenience residents accessing the town centre, though less severely than Alternative A1 wedding venue-related peaks.

Perceived Change in Town Character:

Despite Alternative A3 design mitigations, some residents may perceive the transformation of 11.0 ha of degraded farmland into urban erven as altering Riebeek Kasteel's rural charm. Public feedback on Alternative A1 highlighted concerns about sense of place, and while Alternative A3 addresses this by removing the wedding venue, the shift from open land to residential use might still evoke unease among long-term residents valuing the status quo.

Environmental Strain:

The Botanical Assessment identifies potential degradation of the Krom River corridor (an ESA) due to construction runoff or invasive species spread (e.g., *Populus alba*), indirectly affecting downstream communities relying on the river's ecological services. Though rated Medium-Low pre-mitigation and reduced to Very Low with measures (e.g., 30m buffer, alien removal), any residual impact could concern environmentally conscious residents or those near the river.

Social Dynamics:

The influx of new residents (e.g., ~100-150 households based on erven numbers) could shift community dynamics, potentially creating tension between established residents and newcomers. While socioeconomic benefits are positive, integration challenges or differing expectations (e.g., lifestyle, noise tolerance) might emerge, particularly in a small, tight-knit town like Riebeek Kasteel.

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.

No risks of climate change are expected to influence the proposed development.

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

None.

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.

The mitigation measures, as indicated by the specialist team, have assisted in the evolution of the layout alternatives. The mitigation measures have been added to the conditions of authorisation and EMP to ensure implementation.

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

Mitigation hierarchy has been systematically applied to the proposed development on Erf 878 to manage potential impacts and identify Alternative 3 as the best practicable environmental option. This process involved integrating specialist findings and recommendations with public input to refine the project from initial layouts (Alternative 1 and Alternative 2) to Alternative 3, a mixed-use development featuring residential, retail, and institutional components, a reduced footprint of 110,087 m², as well as the removal of the wedding venue on the hilltop. Below is the outline of how each step of the hierarchy was applied, leading to Alternative 3 as the optimal solution:

Avoidance

The Visual Impact Assessment identified the wedding venue in Alternative 1 and Alternative 2 as a major visual intrusion, obstructing the sight line from the R311 to the historical church steeple and altering Riebeek Kasteel's sense of place which is a key public concern. However, Alternative 3 avoids this impact entirely by removing the wedding venue, replacing it with single-storey residential erven on Riebeek Hill. This preserves scenic vistas and cultural heritage, as emphasized in VIA.

The Heritage Assessment found archaeological remains (ESA/MSA flakes, historical tile) to be "Not Conservation Worthy" and heavily disturbed. While complete avoidance is not feasible due to the development footprint, A3 avoids unnecessary disturbance by limiting intensive excavation to already transformed areas, leveraging the site's degraded state.

The site has been found to be completely transformed with only natural veld remaining, therefore development of this specific site avoids impacts relating to vegetation loss of high-quality natural vegetation, which may have been applicable to the development of another site elsewhere. The proposal is utilising a transformed site within a designated urban area for development.

Application of the 32m buffer on watercourses has also been applied as farm as possible to avoid water resources on site.

Minimising

Alternative 3 reduces the development footprint and includes a significantly less dense development offering. The number of erven located on the hilltop have now dropped from 23 to 11, with larger plots, lessening the ecological and visual impacts.

In addition, the various specialist has provided mitigation measures which aim to reduce the overall impacts of the proposed development, and these are included in the EMPr and as conditions of authorisation.

SECTION J: GENERAL

1. Environmental Impact Statement

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

Summary of the Key findings of the EIA:

The EIA identified Erf 878 as the only viable developable vacant land in Riebeek Kasteel meeting essential criteria for economic viability, location, size, accessibility, and topography, making it an ideal site for the envisaged variety of residential styles (low-density erven, town housing, flats). Its position within the urban edge and designation in the draft 2023 Swartland Municipal Spatial Development Framework (SDF) for residential and business development underscored its suitability, despite its current Agriculture 1 zoning, necessitating a land use planning application for rezoning and subdivision. This strategic location inside the urban edge supports the project's feasibility and integration with existing infrastructure.

The 2018 South African Vegetation Map classified the natural vegetation on Erf 878 as critically endangered Swartland Shale Renosterveld. However, the site's long history of agricultural use over a century of dryland cultivation followed by grazing has left it entirely degraded, with no remnants of this vegetation type. The Botanical Assessment study conducted on site confirmed that, after 10 years without cultivation, only pioneer vegetation has re-established, rendering the site suitable for urban development with minimal ecological loss. The presence of alien invasives (e.g., *Acacia mearnsii*, *Populus alba*) and a degraded Krom River corridor (an ESA) were noted, but impacts are rated Medium-Low without mitigation, reducible to Very Low with measures like river protection and invasive removal.

The Heritage and Visual Impact Assessments identified a significant sightline from Church Street across the centre of Erf 878 in a northeasterly direction towards the old church, located approximately 500 meters away on a ridge. Initial concerns raised by these assessments regarding the potential obstruction of this view by the proposed wedding venue were effectively addressed in Alternative 3 through its removal, thereby preserving the visual corridor. The Archaeological Assessment identified degraded remains (such as ESA/MSA flakes and a historical tile) deemed "Not Conservation Worthy", indicating a very low heritage impact that warrants only monitoring. Furthermore, the Visual Impact Assessment (VIA) confirmed that the layout proposed in Alternative A3 replicates the block-type pattern characteristic of historic

Riebeek Kasteel, featuring single-storey structures with traditional architectural styles. This approach is considered to preserve the town's sense of place and integrate harmoniously with the R311 cultural route. While the visual impacts were assessed as moderate to high without mitigation, they can be significantly reduced through landscaping and design controls.

Noise levels will see a very slight increase during construction and operation, as noted in the EIA, but this will be gradual and absorbed over time as buildings and greening (e.g., trees from the VIA's landscape plan) progress, dissipating impacts naturally. The Traffic Impact Assessment projected moderate traffic increases (206 AM, 589 PM peak trips), manageable with well-designed accesses (Church Rd, Fontein St) operating at good service levels, supported by parking, public transport facilities, and a sidewalk. No significant water bodies beyond the fountain and river corridor affect the site, and runoff management aligns with existing drainage patterns to the Berg River.

In conclusion, the EIA's key findings affirm Erf 878's suitability for Alternative 3 due to its degraded ecological state, strategic zoning, and manageable impacts. The integration of specialist studies—Botanical (minimal ecological value, river focus), Heritage (low archaeological significance), Visual (sight line preservation, townscape fit), and Traffic (moderate, mitigable impacts)—informed a design that avoids significant environmental harm, minimizes disruptions (e.g., noise, traffic), and enhances community benefits (e.g., housing, accessibility). Alternative 3 emerged as the best practicable environmental option, refined through public input and specialist recommendations, ensuring sustainable development within Riebeek Kasteel's urban fabric.

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 B.**

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.

Alternative 3

Positive impacts

- → Removal of alien invasive species (e.g., *Acacia mearnsii, Populus alba*) as per the Botanical Assessment enhances the Krom River corridor's ecological condition, reducing risks like siltation and invasive spread. The open space preserves the drainage line as well as the artificial seepage, supporting minor restoration (e.g., wild olive replanting) and stormwater management.
- → The VIA confirms that a single-storey, traditional architecture and mixed landscape plan (oaks, gums, wild olive) integrate with the R311 cultural route and historical grid, preserving the sight line to the old church and enhancing Riebeek Kasteel's townscape aesthetic.
- → Development unlocks short-term economic potential through construction jobs and long-term benefits via property rates, taxes, and operational employment (retail, frail care), feeding into the Swartland Municipality's economy, as aligned with the 2023 SDF.
- → This alternative provides diverse housing option and a frail care facility, meeting community needs for residential options and elderly care, boosting Riebeek Kasteel's liveability and supporting population growth within the urban edge.
- → The TIA's road designs (e.g., 6.0m blacktop width), accesses (Church Rd, Fontein St), parking, public transport facilities, and sidewalk enhance connectivity and accessibility, benefiting residents and visitors with minimal strain on existing systems.

Negative impacts

- → The Botanical Assessment notes that transforming 11.0 ha of degraded veld impacts a small CBA and the Krom River ESA, rated Medium-Low without mitigation. While degraded, this permanent loss removes any residual ecological potential, though mitigated to Very Low with measures like alien removal and a 30m buffer.
- → Temporary impacts include noise, dust, and runoff during the 1–2-year construction phase (VIA Section 8.5.2), potentially affecting air quality and the Krom River if not controlled, though mitigable with EMPr measures (e.g., daytime work, water spraying).
- → Slight noise increases and moderate traffic disruptions (206-589 peak trips, TIA) during construction may inconvenience neighbours (New Orleans), though these dissipate over time with development progression and mitigation.
- → Introducing >100-150 households could shift community cohesion, with potential tension between existing residents and newcomers over lifestyle or resource use, though offset by economic benefits.
- → Despite Alternative 3A design preserving the townscape, some residents may perceive the shift from fallow land to urban use as eroding Riebeek Kasteel's rural charm, a risk noted in public feedback on earlier alternatives.

No-Go option

- → Avoids all development-related impacts, maintaining the current degraded state with pioneer vegetation and no further loss to the CBA or ESA.
- → Preserves the fallow land's rural aesthetic, potentially aligning with some residents' preference for minimal change.
- → No ecological gain, as the degraded Krom River and CBA remain unaddressed, with alien invasives continuing to spread unchecked (Botanical Assessment). Ongoing degradation from external factors (e.g., runoff) persists.
- → No new jobs, housing, or revenue (e.g., rates/taxes) as per the 2023 SDF's vision, stunting municipal growth and leaving community needs (frail care, retail) unmet. Risks economic stagnation for Riebeek Kasteel.

Alternative 3 offers the most balanced outcome. Its positive environmental impacts (alien removal, open space) mitigate ecological risks more effectively than Alternative 1 or 2, which exacerbates impacts with a larger footprint and venue, while surpassing the "No-Go" option's lack of intervention. Alternative A3 community benefits (economic growth, housing, infrastructure) outweigh Alternative 1's higher revenue potential, which comes at the cost of visual and traffic burdens and far exceed the "No-Go" option's null contribution. Negative environmental risks in Alternative 3 (vegetation loss, construction disruption) are minimal and well-mitigated (Very Low after mitigation), unlike Alternative 1's greater ecological and visual toll, while the "No-Go" option avoids impacts but offers no restoration. Community risks (nuisance, social shifts) in Alternative 3 are temporary or manageable, contrasting with Alternative 1's significant disruptions and the "No-Go" option's economic detriment.

Alternative 3 minimises risks while maximizing benefits, aligning with sustainable development principles under NEMA. Alternative 1's intensified impacts and public opposition render it less viable, while the "No-Go" option fails to leverage Erf 878's potential within the urban edge, contradicting municipal goals. Thus, Alternative 3 is the preferred option for its environmental compatibility and community enhancement.

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

BOTANICAL ASSESSMENT

The following general mitigation actions should also be implemented:

- → All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must include the recommendations made in this report.
- → A suitably qualified Environmental Control Officer must be appointed to monitor the construction phase in terms of the EMP and any other conditions pertaining to specialist studies.
- → The layout of the development footprint should take the sensitivity of the Krom River into account and should aim to establish a suitable corridor along this river system in order to allow for potential rehabilitation of this ecosystem.
- → The olive trees discussed under Heading 7.1 should be considered for replanting into green belts or gardens.
- → All listed alien invasive tree species must be removed from the site, while special care must be taken with the removal of white poplar (in order to ensure it does not enter the river system.
- → Lay-down areas or construction sites must be located at least 30m away from the Krom River corridor;
- → An integrated waste management approach must be implemented during construction.
    - o Construction related general and hazardous waste may only be disposed of at suitably approved waste disposal sites.

HERITAGE IMPACT ASSESSMENT

Visual Impact Assessment

- → **Site Development Plan**: Consideration of the existing local town grid and the site contours must be investigated (as seen in Alternative 3). The retention of Riebeek Hill as significant Open Space should be considered (as seen in the provision of larger Erven on the hill in Alternative 3).
- → **Architecture:** The design of buildings needs to incorporate traditional typologies and details that will make a better fit with this historic town and prevent a modernist intrusion on a heritage landscape.
- → **Landscape Plan:** A Landscape Plan has already been prepared and a reference to traditional tree and shrub species is desirable e.g. Oak and Gum trees.
- → **Tree Plan:** Trees both on-site and adjacent need to be mapped to ensure their conservation and incorporation into the development, including both traditional heritage tree species like oaks, gums and poplars, and indigenous/endemic species like Wild Olive.
- → **Planting:** There is no need to rigidly adhere to any "indigenous-only" kind of botanical extremism in an urban setting, especially one with strong historic connections.
- → **Fencing:** Is always a key feature of Architectural/Landscape detailing as it strongly affects the edge condition. Subtle, well-detailed, traditional fencing options and colours are preferred. ClearVu fencing is not desirable especially along the R311.
- → **Colouration:** Colouration is a key tool to fitting any development into the landscape. There is a strong tendency for monotonous charcoal/grey estate colourations today and black fencing ClearVu fencing. These are not traditional colours in the Cape and detract from both contemporary and historic environments. A subtle combination of scheme colours needs to be developed that will avoid a mass approach to colouration with a high visual impact.
- → **Maintenance:** Landscape Maintenance, both private and public, including streetscapes, needs to be integrated into the scheme.
- → **Damage Control:** All parties must make every effort to control the destruction of soils and vegetation on site, especially any remnants of natural vegetation. These must not be damaged under any circumstances.
- → **Pollution:** Chemical damage by cement mixing directly on the ground and by diesel, etc spills must also be prevented at all costs, as should vandalism of the plants and accidental damage to limbs by workers and machinery. Fires must be prevented also at all costs in all areas. Penalties and incentives should be implemented as can fencing off areas.

- → **Monitoring:** Monitoring of the landscape, soils and vegetation during construction is very important and must be attended to regularly. Damage to some is all too inevitable and often irreversible. Adequate indigenous (preferably endemic) vegetation must be planted.
- → **Lighting:** Lighting should be minimised and carefully controlled as part of the project's management plan. The use of green energy fittings and concepts should be encouraged and lighting developed with sensitivity to the rural landscape.

ARCHAEOLOGICAL

- → No further archaeological mitigation is required.
- → No archaeological monitoring is required during construction phase excavations
- → If any buried human remains are uncovered during construction excavations, these must be immediately reported to the archaeologist (J Kaplan 082 3210172. Burials must not be disturbed until inspected by the archaeologist.

FRESHWATER IMPACT ASSESSMENT

- → The loss of the seriously degraded Seep Wetland 2, along with the loss of portions of Seep Wetland 1, should be compensated for by rehabilitating the Remnant Seep Wetland 1.
- → No untreated stormwater should enter the Remnant Seep Wetland 1 or "Offset" wetland area
- → Avoid encroachment into the remnant Seep Wetland 1 and the Krom River during construction and operational phases. These two areas should be set aside as a No Go for construction and operational phases.
- → A 20 m buffer area should be implemented around the remnant Seep Wetland 1; and a 10 m buffer around the Krom River (aboveground). The portions of the buffer areas that are located outside of the demarcated construction footprint should be designated as a No-Go area.
- → Tie into mainline sewage if possible or use fully contained conservancy tanks serviced by truck. No sewage treatment, irrigation or soak-aways should be contemplated.
- → Allowance must be made for stormwater to be treated in a vegetated detention pond and/or a substantial vegetated swale before release into the Krom River or Remnant Seep Wetland 1.
- → Municipal water supply should be used if possible
- → Alternative 1 and 2 both included a service station within proximity to Seep 1, while Alternative 1 also included a wedding venue on top of the hillock on the site. Alternative 3, which excludes the fuel station located close to Seep 1 is preferred from an aquatic perspective.

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.

Assessment of the Proposed Development

Alternative 3, a mixed-use project comprising low-density residential erven, town housing erven, flats, retirement component, a frail care facility, retail spaces, and open space within a reduced footprint of 110087 m² warrants careful consideration under the National Environmental Management Act, 1998 (NEMA). Erf 878 is currently a large parcel of fallow agricultural land, severely impacted by continuous past agricultural activities, resulting in a degraded state where only pioneer vegetation has re-established over the past 10 years of non-cultivation. Located within the urban edge of Riebeek Kasteel and earmarked for residential and business development in the 2023 Swartland Municipality Spatial Development Framework (SDF), the site presents a unique opportunity to unlock economic potential while managing environmental impacts.

Environmental and Ecological Considerations

The Botanical Assessment confirms that Erf 878's Swartland Shale Renosterveld, classified as critically endangered, has been entirely transformed by historical agriculture, with no significant ecological features remaining beyond a degraded Krom River Ecological Support Area (ESA) and a small Critical Biodiversity Area (CBA) on the hilltop. The absence of unique habitats or protected species, coupled with the limited rehabilitation potential of the Krom River due to external degradation factors (e.g., upstream runoff), suggests that the site's ecological value is minimal. The decision not to implement the botanical specialist's recommendation for a formal Krom River corridor is justified by this degraded baseline and the sufficiency of alternative mitigations, reducing cumulative impacts from Medium-Low to Very Low. The "No-Go" option offers no ecological benefit and perpetuates the status quo of degraded land, supporting the case for development over preservation.

Cultural and Visual Considerations

The Heritage Impact Assessment (Archaeological) found only degraded, "Not Conservation Worthy" remains (such as ESA/MSA flakes, a historical tile), indicating a very low cultural impact that requires only monitoring rather than preservation. Visually, the VIA underscores Erf 878's prominence from the R311 and the importance of a sight line to the old church 500m away, both of which Alternative 3 preserves by eliminating Alternative 1's wedding venue and adopting a single-storey, traditional block-type layout mirroring old Riebeek Kasteel. This design, with 15% open space and a mixed landscape plan (e.g., oaks, gums, wild olive), mitigates moderate-high visual impacts, blending with the townscape and addressing public concerns about sense of place. Construction-phase disruptions such as noise and dust are temporary and manageable, further supporting Alternative 3 acceptability.

Infrastructural and Socioeconomic Benefits

The Traffic Impact Assessment (TIA) projects moderate traffic increases (206 AM, 589 PM peak trips), well within the capacity of Church Rd and Fontein St accesses, which operate at good service levels with mitigations like road designs, parking, and a sidewalk. Noise increases are slight and will dissipate over time with development progression. Economically, Alternative 3 unlocks significant potential for the Swartland Municipality through short-term construction jobs and long-term property rates and taxes, as well as benefits for the developer that feed into the wider local economy. This aligns with the 2023 SDF's vision, providing housing, retail, and frail care services to meet community needs, enhancing Riebeek Kasteel's growth within its urban edge.

Based on this assessment, it is of the EAP's opinion to recommend that the proposed development as presented in Alternative 3, be authorized. The site's severely degraded condition lacking ecological and cultural significance minimises environmental loss, while Alternative 3 design effectively mitigates visual and infrastructural impacts, preserving the town's character and ensuring sustainable integration. The socioeconomic benefits such as economic stimulation, housing provision, and alignment with municipal planning outweigh the temporary construction impacts and negligible residual environmental effects. The "No-Go" alternative offers no advantage, maintaining a fallow, unproductive state of the site which is contrary to the local Municipal SDF's objectives. Alternative A3 represents the best practicable environmental option, as refined through this EIA and mitigation hierarchy (avoidance via layout changes, minimization via construction controls, restoration via landscaping), balancing development with environmental responsibility.

Conditions for Authorization

- → Specialist mitigation measures to be implemented
- → The perforated brick "fountain" in the northern section, as mandated by the Title Deed, must remain accessible to the public, with its 32-meter watercourse boundary under NEMA 2014 maintained. The development layout must incorporate this feature without obstruction, ensuring legal and community obligations are met.
- → All buildings must adhere to the VIA's recommendations for single-storey, traditional architecture (e.g., typologies mirroring old Riebeek Kasteel), using subtle colours (e.g., avoiding bright whites) and fencing (e.g., no ClearVu along R311). The landscape plan (oaks, gums, wild olive) must be implemented within the first year of operation to enhance visual integration and mitigate heat impacts.

→ A detailed stormwater management plan must be submitted and approved by the Swartland Municipality prior to construction, addressing runoff from the site (e.g., northeast gravel ditch to the Berg River) and ensuring no exacerbation of downstream flooding (e.g., New Orleans). This must align with TIA road designs and geotechnical findings on clay layers and water tables.

→ Road and access designs (e.g., 6.0m blacktop width, Church Rd and Fontein St intersections) must comply with TIA specifications and local standards, with off-street parking, public transport facilities at retail premises, and a surfaced sidewalk along the Class 5 Local Street completed before occupancy to ensure safe, sustainable access.

→ Water Use Licence will be required for this project due to the encroachment of the development into the onsite seep wetland areas.

2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.

There were no assumptions, uncertainties and gaps in the knowledge that relate to the assessment and mitigation measures proposed. As always with development projects of this nature there are some uncertainties about the fluctuations in the economic climate that may influence the timing of the economic benefits that are to be derived.

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.

The EA should be valid for a period of at least 10 years. The portion of the Environmental Authorisation that deals with operational aspects should be open-ended.

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.

There is a structure on the property where seepage water collects. This source of water may be used for construction purposes and as source of irrigation water for use on the property. Other measures of water saving that could be imposed by the Swartland Municipality may be restricting garden irrigation during certain warm daylight hours, incremental potable water pricing amongst other.

4. Waste

Explain what measures have been taken to reduce, reuse or recycle waste.

All waste generated within the jurisdiction of the Swartland municipal area must abide by the municipal regulations pertaining to waste separation, reduction, reuse and recycling.

5. Energy Efficiency

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

Due to the unbridled rising cost of power supply implemented by Eskom, as well as the erratic surety of supply, there has been a very strong migration by individual homeowners and micro-business to solar power installations in South Africa. During the last two years this solar power generation equates collectively to the equivalent of a Medupi Eskom power station. This tendency is also expected to manifest itself in the proposed 878 residential and business development.

In addition the new buildings on Erf 878 will have to conform to building specifications as laid down by the Swartland Municipal By-laws pertaining to building regulations related to energy efficiency.

SECTION K: DECLARATIONS

SECTION K: DECLARATIONS

DECLARATION OF THE APPLICANT

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

I, Allan Geldenhuys for Silver Solutions 3371 cc ID number 2011/049555/23 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.

11/03/2025

Signature of the Applicant: Date:

SILVER SOLUTIONS 3371 CC

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I **MICHELLE NAYLOR** EAP Registration number EAP **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

12/03/2025

Signature of the EAP: Date:

Lornay Environmental Consulting (Pty) Ltd

Name of company (if applicable):

DECLARATION OF THE REVIEW EAP

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

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

Signature of the EAP: Date:

Name of company (if applicable):

DECLARATION OF THE SPECIALIST – TO BE ADDED UPON SUBMISSION

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):