



27 Heron Circle
Kommetjie
7975
27.03.2025

Lornay Environmental Consulting
Att: Michelle Naylor

**PROPOSED DEVELOPMENT OF TOURISM ACCOMMODATION FACILITIES AT RUSTY GATE
MOUNTAIN RETREAT COMPRISING FARM NO. 824, REMAINDER FARM NO. 826 AND FARM NO. 887,
CALEDON, THEEWATERSKLOOF MUNICIPALITY**

FRESHWATER ECOLOGICAL ASSESSMENT OF ALTERNATIVE 3

Background

In response to an organ of state's concern regarding clustering the proposed tourism accommodation development, Alternative 3 (Rev5 – see Appendix A) completely removes all development proposed on the two outlying farms and relocates it into clustered areas on the core farm – Remainder Farm 826, as follows

- Sites 26 and 27 which were previously on Farm 824 have been moved to site 25 on Remainder Farm 826 to form a cluster of units; and
- Site 28 which was previously located on Farm 887 have been moved to join site 25 and 27 on Farm 826.

This means that the 2 outlying farms remain completely undeveloped, improved clustering of development on core property, Remainder Farm 826, and improved fire management etc. In addition, moving site 27 off Farm 824 completely avoids the delineated wetland area in close proximity to the proposed accommodation unit and the need for road extension to access the former site. As a result, all new development is located more than 32 m from the delineated wetlands and watercourses.

Another significant change is that the three farms will be rezoned to open space 4 for conservation purposes and stewardship.

Potential Freshwater Ecological Impacts and Risk Assessment

Given that no new accommodation facilities or associated infrastructure (including new roads) are proposed within 32m of any of the delineated watercourses, the potential freshwater ecological impacts associated with the proposed development would be of lower significance than indicated in the Freshwater Ecological Assessment prepared by EnviroSwift (EnviroSwift, 2024).

Also the risk ratings for all the identified Section 21 c and i activities as presented in the Risk Assessment Matrix included in the Freshwater Ecological Assessment prepared by EnviroSwift (EnviroSwift, 2024) would remain in the LOW class and as such the Water Use Application required in terms of the National Water Act, Act 36 of 1998 would remain a General Authorisation.

Conclusion

EnviroSwift supports the proposal to cluster the development within the core farm, Remainder Farm 826 and the relocation of site 27 to a less sensitive area with a greater setback from watercourses (at least 32 m). As a result the impacts and risks associated with Alternative 3 are lower than the assessment presented in the

Nick Steytler
Sole Proprietor
T/A EnviroSwift Western Cape
082-322 4074
nick@enviroswift.co.za

Freshwater Ecological Assessment prepared by EnviroSwift (EnviroSwift, 2024). As such Alternative 3 is the most preferred alternative from a freshwater ecological perspective.

Regards

A handwritten signature in black ink, appearing to read 'Nick Steytler', with a long horizontal stroke extending to the right.

Nick Steytler SACNASP Reg. no. 400029/02
EnviroSwift Western Cape

APPENDIX A: ALTERNATIVE 3 (REV 5)

RUSTY GATE

