



LORNAY
ENVIRONMENTAL CONSULTING

PROOF OF PUBLIC PARTICIPATION

Proposed residential development on ERF 438, Stanford, Caledon RD

May 2025

Updated 11 Nov 2025

Consultant:

Michelle Naylor | Env. Consultant | M.Sc., Pr. Sci. Nat., EAPASA
cell: 083 245 6556 | michelle@lornay.co.za | www.lornay.co.za
Unit 5/1F, Hemel & Aarde Wine Village, Hermanus
Lornay Environmental Consulting Pty Ltd | Reg 2015/445417/07

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1. INTRODUCTION

The Public Participation Process was 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). All potential interested and affected parties (I&APS) and applicable organs of state were notified of the DRAFT / pre-application Basic Assessment Report (BAR) and associated documents including the Heritage Impact Assessment as per the National Heritage Resources Act (NHRA).

The DRAFT BAR and Heritage Impact Assessment was made available for a 30-day period to I&APS and organs of state, to register and comment. Noticeboards were placed on site, and a newspaper advertisement was placed in the local newspaper. All comments were recorded in a comments and response report and a register for I&APS was opened. Once the 30-day public participation on the DRAFT BAR was complete, all comments made were attended to and the Final Basic Assessment and associated Reports were updated accordingly.

The Application form for Environmental Authorisation has now been submitted and the final round of In-Process public participation for all registered I&APS, Organs of State and applicable Heritage I&APS have been notified of their commenting opportunity.

The Application for Environmental Authorisation was then submitted to the Department of Environmental Affairs and Development Planning (DEA&DP), and the mandatory fee payment was made.

This document serves as proof of the public participation carried out in line with Section 41 of the EIA Regulations (2014).

2. LIST OF INTERESTED AND AFFECTED PARTIES AND ORGANS OF STATE

In line with the requirements of NEMA, all potential Interested and Affected Parties (I&APS) were notified of the project and provided with an opportunity to comment. This included applicable organs of state. See list of I&AP's identified for the project:

PRE-APPLICATION PUBLIC PARTICIPATION	
WC Government Env Affairs & Dev Planning	DOA - Elsenburg Cor vd Walt
Development Management	Brandon Layman
Ntanga Mabasa	Brandon.Layman@westerncape.gov.za
Registry Office	
1st Floor, Utilitas Building	
1 Dorp Street	
8001	
2 HC, 1 CD	
Cape Nature	Overberg District Municipality
Rhett Smart	F. Kotze / R. Volschenk
Private Bag x5014	Private Bag x 22
Stellenbosch	Bredasdorp
7599	7280
landuse@capenature.co.za	F. Kotze
1 x HC, CD	Letter, CD
BOCMA	Overstrand Municipality
R. Le Roux	Chester Arendse
Private Bag x3055	PO Box 26
Worcester	Gansbaai
6850	7200
023 346 8000	carendse@overstrand.gov.za
info@bocma.co.za	028 384 8300
WC Government Env Affairs & Dev Planning	
Transport and Public Works	
Provincial Roads	
Vanessa Stoffels	
PO Box 2603	
Cape Town	
8000	
Ref: 17/1/11/B	

Vanessa.Stoffels@westerncape.gov.za	
Stanford Heritage Comm	
James Aling	
james.aling@spandp.co.za	
Stanford Conservation, Chairperson	
John Kelly	
irishjk@me.com	
Stanford Ratepayers Association	
stanfordratepayers1857@gmail.com	
Stanford Heritage Committee	
stanfordheritage@gmail.com	
Overstrand Heritage and Aesthetics Committee	
elowings@overstrand.gov.za	
katie.smuts@gmail.com	
Whale Coast Conservation	
sheraine.wcc@gmail.com	
pat.miller7@outlook.com	
Ward Councillor Stanford	
Erf 294	Erf 559
Overstrand Municipality	Windsong Trust
PO Box 20	ypaters@gmail.com
Hermanus	
7200	Erf 594
rfisher@overtstrand.gov.za	Overstrand Municipality
	rfisher@overstrand.gov.za
Portion 13 of Farm 644	Erf 1152
Bonnybrae Property Holdings	Mr PE Bysshe
admin@birkenhead.co.za	peter@bysshe.co.za
Farm RE 646	Farm 1151
PST South Africa (Pty) Ltd	Overstrand Municipality

nst@srse.wine	PO Box 20
	Hermanus
	7200
Erf 1158	Farm Re/ 645
Dix Brix CC	Overstrand Municipality
team@epictanks.co.za	PO Box 20
	Hermanus
	7200
Farm 21/294	Erf 1174
Overstrand Municipality	Overstrand Municipality
PO Box 20	PO Box 20
Hermanus	Hermanus
7200	7200

3. WRITTEN NOTICE TO I&APS AND ORGANS OF STATE OF DRAFT BAR:

The I&AP's identified above were given written notice of the proposed development, via registered mail or courier, as appropriate. The written notice included details of the applicable legislation, the proposed expansion and means to provide comment or register as I&AP. See written notice below:



4 September 2024

DEA&DP Ref. No.: 16/3/3/6/7/1/E2/37/1035/24
Lornay Ref. No.: 438SF

**NOTICE OF PUBLIC PARTICIPATION FOR A BASIC ASSESSMENT PROCESS:
PROPOSED RESIDENTIAL DEVELOPMENT, ERF 438 STANFORD, CALEDON RD**

Notice is hereby given of a Public Participation Process 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).

Proposal: Rezoning and subdivision for residential development and tourism related activities
Location: Erf 438, Stanford, Caledon RD
Applicant: Omni King Investments (Pty) Ltd

Environmental Authorisation is required in terms of NEMA for the following Listed Activities:

Listing Notice 1

(12) The development of – (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100m²; or (ii) infrastructure or structures with a physical footprint of 100m² or more; where such development occurs – (a) within a watercourse; (b) in front of a development setback; or (c) if no developments setback exists, within 32m of a watercourse, measured from the edge of a watercourse

(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 development 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.

(27) Removal of 1Ha or more, but less than 20Ha of indigenous vegetation, except where such clearance of indigenous vegetation is required for- i) undertaking a linear activity; ii) maintenance purposes undertaken in accordance with a maintenance management plan.

(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.

Michelle Naylor | Env. Consultant | M.Sc., Pr. Sci. Nat., EAPASA
cell: 083 245 6556 | michelle@lornay.co.za | www.lornay.co.za
Unit F, Hemel & Aarde Wine Village, Hermanus
Lornay Environmental Consulting Pty Ltd | Reg 2015/445417/07

Listing Notice 3

(4) The development of a road wider than 4 metres with a reserve less than 13,5 metres. i. Western Cape i. Areas zoned for use as public open space or equivalent zoning; ii. Areas outside urban areas; (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or iii. Inside urban areas: (aa) Areas zoned for conservation use; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority.

(6) The development of resorts, lodges, hotels, tourism or hospitality facilities that sleeps 15 people or more (i) in the Western Cape (ii) outside urban areas (bb) Within 5km from national parks, world heritage sites, areas identified in terms of NEMPAA or from the core area of a biosphere reserve

(12) The clearance of an area of 300m² 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.

i) Within any critically endangered or endangered ecosystem listed in terms of Section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004.

ii) Within critical biodiversity area in terms of a bioregional plan, iii) Within the littoral active zone or 100m inland from the highwater 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. iv) On land, where at the time of coming into effect of this Notice or thereafter such land was zoned Open Space, conservation or has an equivalent zoning; 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.

A Basic Assessment Process is applicable. A copy of the Basic Assessment Report and relevant specialist studies, including the Heritage Impact Assessment, is available for download on our website or upon request. Interested and Affected Parties (I&AP's) are hereby invited to register as an Interested and Affected Party (I&AP) and / or comment on the proposed activity on / or before **7 October 2024** via the following contact details:

LORNAY ENVIRONMENTAL CONSULTING
ATT. Michelle Naylor
Unit F, Hemel & Aarde Wine Village, Hermanus
Tel. 083 245 6556
Email. michelle@lornay.co.za | Website. www.lornay.co.za

4. PROOF OF NOTICE TO I&APS AND ORGANS OF STATE

Written notice was provided to I&APs and Organs of State via registered mail or courier, as indicated in the proofs below:

michelle@lornay.co.za

From: michelle@lornay.co.za
Sent: Tuesday, 03 September 2024 12:05
To: 'Ntanganedzeni Mabasa'; Rhett Smart; Cor Van der Walt;
'Brandon.Layman@westerncape.gov.za'; Rulien Volschenk; 'Rafeeq le Roux';
'info@bocma.co.za'; carendse@overstrand.gov.za; Penelope Aplon; 'Vanessa Stoffels'
Cc: DEADP EIA Admin; 'Andrea Thomas'
Subject: Notice of Public Participation | Erf 438 Stanford
Attachments: Notice of Draft PPP 438.pdf

Dear I&AP and / Organ of State,

DEADP Ref - 16/3/3/6/7/1/E2/37/1035/24

DEADP – N. Mabasa
Cape Nature – R. Smart
DOA – Cor van der Walt / B. Layman
ODM – R. Volschenk
BOCMA – R. Le Roux / info
OM – C. Arendse / P. Aplon
DTPW – V. Stoffels

Please see attached notice of public participation for the pre-application, draft Basic Assessment report for the proposed development on Erf 438 Stanford. Should you have any further comment, please ignore this notice.

Kind regards



LORNAY

ENVIRONMENTAL CONSULTING

Michelle Naylor

M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIA

Hemel & Aarde Wine Village – Unit 3A

PO Box 1990, Hermanus, 7200, South Africa

T +27 (0) 83 245 6556

E michelle@lornay.co.za | W www.lornay.co.za

Reg No. 2015/445417/07

michelle@lornay.co.za

From: michelle@lornay.co.za
Sent: Tuesday, 03 September 2024 12:08
To: 'james.aling@spandp.co.za'; 'irishjk@me.com'; 'stanfordratepayers1857@gmail.com'; 'stanfordheritage@gmail.com'; 'elowings@overstrand.gov.za'; 'katie.smuts@gmail.com'; Sheraine Van Wyk; 'pat.miller7@outlook.com'
Cc: 'Jenna Lavin'
Subject: Notice of Public Participation | Erf 438 Stanford
Attachments: Notice of Draft PPP 438.pdf

Dear I&AP and / Organ of State,

DEADP Ref - 16/3/3/6/7/1/E2/37/1035/24

Please see attached notice of public participation for the pre-application, draft Basic Assessment report, with Heritage Impact Assessment, for the proposed development on Erf 438 Stanford. Should you have any further comment, please ignore this notice.

Kind regards,



LORNAY

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Michelle Naylor

M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIA

Hemel & Aarde Wine Village – Unit 3A

PO Box 1990, Hermanus, 7200, South Africa

T +27 (0) 83 245 6556

E michelle@lornay.co.za | W www.lornay.co.za

Reg No. 2015/445417/07

michelle@lornay.co.za

From: michelle@lornay.co.za
Sent: Tuesday, 03 September 2024 12:11
To: 'rfisher@overtstrand.gov.za'; 'aleroux@overstrand.gov.za'; 'ypaters@gmail.com';
'admin@birkenhead.co.za'; 'peter@bysshe.co.za'; 'nst@srse.wine';
'team@epictanks.co.za'
Subject: Notice of Public Participation | Erf 438 Stanford
Attachments: Notice of Draft PPP 438.pdf

Dear I&AP and / Organ of State,

DEADP Ref - 16/3/3/6/7/1/E2/37/1035/24

Please see attached notice of public participation for the pre-application, draft Basic Assessment report, with Heritage Impact Assessment, for the proposed development on Erf 438 Stanford. Should you have any further comment, please ignore this notice.

Kind regards,



LORNAY

ENVIRONMENTAL CONSULTING

Michelle Naylor

M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAA

Hemel & Aarde Wine Village – Unit 3A

PO Box 1990, Hermanus, 7200, South Africa

T +27 (0) 83 245 6556

E michelle@lornay.co.za | W www.lornay.co.za

Reg No. 2015/445417/07

michelle@lornay.co.za

From: michelle@lornay.co.za
Sent: Tuesday, 03 September 2024 14:27
To: 'dcoetzee@overstrand.gov.za'
Subject: Notice of Public Participation | Erf 438 Stanford
Attachments: Notice of Draft PPP 438.pdf

Dear I&AP and / Organ of State,

DEADP Ref - 16/3/3/6/7/1/E2/37/1035/24

Please see attached notice of public participation for the pre-application, draft Basic Assessment report, with Heritage Impact Assessment, for the proposed development on Erf 438 Stanford. Should you have any further comment, please ignore this notice.

Kind regards,



LORNAY

ENVIRONMENTAL CONSULTING

Michelle Naylor

M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAAs

Hemel & Aarde Wine Village – Unit 3A

PO Box 1990, Hermanus, 7200, South Africa

T +27 (0) 83 245 6556

E michelle@lornay.co.za | W www.lornay.co.za

Reg No. 2015/445417/07

5. NEWSPAPER ADVERTISEMENT

An advertisement was placed in the local newspaper, the Hermanus Times, regarding the proposed development:

DONATE BLOOD IT COULD SAVE YOUR LIFE

What blood type are you?

Western Cape Blood Service
Do something remarkable!
t: 021 507 6300 e: info@wcbss.org.za
www.wcbss.org.za

Make a difference today!
Your blood are crucial.
All people are encouraged to donate blood.
Blood Type O- and O+ can be transfused to all other blood groups!

Vacancies available online

Scan me



In the estate of the late: **WESSEL JOHANNES VORLDO**
Date of birth: 12 SEPTEMBER 1933
Identity Number: 339912 5609 08 1
of: 4 LEMMER CLONK, ONIBURGER, 7201
and surviving spouse: **MARITHA ELIZABETH VORLDO**
Identity Number: 491107 0874 08 7
who were married in community of property to each other
Estate Number: 16878/2024
Date of death: 3 AUGUST 2024

Debtors and Creditors in the above Estate are hereby required to file their claims with and pay their debts at the undersigned within 30 days of the 07th of SEPTEMBER 2024.

CJ Bierman (Executor)
Voorster en Steyn
PO Box 500
HERMANUS
7280

Voorster & Steyn
Notaries, Attorneys & Conveyancers

OVERBERG

The **OVERBERG DISTRICT MUNICIPALITY** has the following vacancy in the Directorate Community Services, Department: Roads Services to be filled permanently as soon as possible.

PROFESSIONAL OFFICER: RE-GRAVEL AND CONCRETE

T-Grade	Salary scale
14	R478 632 – R621 276 per annum

Please note that this is a re-advertisement. Please visit our website at www.odm.org.za for the detailed advertisement and information regarding the application process.

Closing date: 20 September 2024.

APRINA WILSON

LOST OR DESTROYED DEED

Notice is hereby given in terms of regulation 68 of the Deeds Registries Act, 1937, of the intention to apply for the issue of a certified copy of Deed of Transfer T49959/1993

passed by **THEWATERSKLOOF MUNICIPALITY**

in favour of **ALEX TSHIBASI WITBOOI**
Identity Number: 389921 0127 010 and
VUYELWA ELIZABETH WITBOOI
Identity Number: 481118 0294 999

in respect of certain

ERF 2513 GRABOUW
IN THE THEWATERSKLOOF MUNICIPALITY
DIVISION OF CALEDON
WESTERN CAPE PROVINCE

which has been lost or destroyed.

All persons having objection to the issue of sixth copy are hereby required to lodge the same in writing with the Registrar of Deeds at Cape Town, ROOM 4216, 12th FLOOR, 90 FLEIN STREET, CAPE TOWN within two weeks from the date of the publication of this notice.

Dated at GRABOUW on 29 August 2024.

GJ CLAUUGHTON ATTORNEY
ELGIN JUNCTION 99 MAIN ROAD GRABOUW 7160
Email: info@gjclauughtonattorneys.co.za
Tel: 021 859 2852

G. J. Clauughton
ATTORNEY

In the Estate of the Late **JOHANNES WYNAND LOUW DE VILLIERS**, Identity number: 440918 9073 086 of 30 Duiker Street, Vermont who died at Hermanus on 24 June 2024, married out of community of property without accrual to Elzani de Villiers.

MASTER'S REFERENCE: 16666/2024

Debtors and Creditors in the above Estate are requested to pay their debts and lodge their claims with the undersigned within a period of 30 (THIRTY) days reckoned as from **FRIDAY, 06 SEPTEMBER 2024**

GUTHRIE & THERON ATTORNEYS,
J P VAN ROOYEN EXECUTOR
77 MAIN ROAD, HERMANUS
JF Rfp/00646

GUTHRIE & THERON
ATTORNEYS

VERLORE OF VERNIETIGDE TITELBEWYS

Hiermee word kennis gegee dat kragners die bepalings van Regulasie 68 van die Registrasie van Aktes Wet 1937, dit die voorneme is om aansoek te doen om gesertifiseerde afskrif van Transaksie ST 10055/2019 gepasseer deur Die Trusteers inderlyk van LETS GROUW TRUST ten gunste van MARGARET ELIZABETH PAGLIARI ten namsen van sekere EENHEID 9, JAKARANDA HOF, VILLIERSDORP wat verlore geraak het of vernietig is.

Alle persone wat teen die uitreiking van sodanige afskrif bewaare het, word hierby versoek om dit skriftelik in te dien by die Registrateur van Aktes te Kamer 1216, 12de vloer, Pleinstraat 90, KAAPSTAD binne twee weke na datum van publikasie hiervan.

GETEKEN te GRABOUW op 27 AUGUSTUS 2024

Nico Welhemyer Prokureurs
Orchard Street 21, Grabouw 7160
Kontaknommer: N Welhemyer 021-8595100

Nico Welhemyer Prokureurs, Orchard Street 21, Grabouw 7160, Kontaknommer: N Welhemyer 021-8595100

THEWATERSKLOOF MUNISIPALITEIT

AANSOEK OM OPHEFFING VAN 'N BEPERKENDE VOORWAARDE TEN OPSIGTE VAN 'N GRONDGEBOUWDE ERF 1653, RIVIERSONDEREND

Aansoeker: Shiyam Longat, Saldanhastraat 13b, RUYTERWACHT, 7460
Eienaar: Shiyam Longat, Bogostaal 25, RIVIERSONDEREND, 7250
R/1653/4317/2024
Verwysingsnommer: R/1653, RIVIERSONDEREND
Kantingsaansoeknommer: KOR 17/2024

Volledige beskrywing van aansoek:

NOTICE OF PUBLIC PARTICIPATION FOR A BASIC ASSESSMENT PROCESS PROPOSED RESIDENTIAL DEVELOPMENT, ERF 438 STANFORD, HERMANUS
DEAD&P Ref.: 16/5/316/7/1/E2/37/1035/24

Notice is hereby given of a Public Participation Process 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).

Proposal: Rezoning and subdivision for single residential development and tourism overnight eco estate
Location: Erf 438 Stanford, along the R43
Applicant: Omni King Investments (Pty) Ltd represented by Kevin King

Environmental Authorisation is required in terms of NEMA for the following Listed Activities:

Listing Notice 1, Activity 12, 19, 27, 28
Listing Notice 3, Activity 4, 6, 12

A Basic Assessment Process is applicable. A copy of the Basic Assessment Report is available for download on our website or upon request. Interested and Affected Parties (I&APs) are hereby invited to register as an interested and Affected Party (I&AP) and/or comment on the proposed activity on or before 7th October 2024 via the following contact details:

LORNAY ENVIRONMENTAL CONSULTING
For Attn: Michelle Naylor
Unit 3F, Harmel & Aarde Wine Village, Hermanus
Tel: 083 245 6556
Email: michelle@lornay.co.za | www.lornay.co.za

1. Opheffing van die volgende beperkende voorwaarde ten opsigte van Erf 1653, Riviersonderend ingevolge Artikel 15(2)(f) van die Theewaterskloof Munisipaliteit Verordening op Munisipale Grondgebruikbeplanning, 2022:

- Titelaktoevorende C(b): Dat slegs een woning, tesame met sodanige buitegeboue wat gewoontlik daarmee gebruik moet word, op hierdie erf opgerig word; en
- Titelaktoevorende C(e): Dat hierdie erf nie ononderdeel mag word nie behalwe met die skriftelike toestemming van die Administrateur.

Kennis word hiermee gegee ingevolge die Theewaterskloof Munisipaliteit se Verordening op Munisipale Grondgebruikbeplanning dat bogenoemde aansoek ontvang is en beskikbaar is vir inspeksie/gehoënde kantonre van 04 September 2024 tot 14 Oktober 2024 by die Departement Stadsbeplanning en Bouwreël, Caledon by 6 Plein Street, Caledon, 7230. Elke skriftelike bewaare of kommentaar teen die voorsiening ingevolge Artikel 50 van die genoemde wetgewing aan die Munisipale Bestuurder, Postbus 24, Caledon, 7250. Faks no: 028 214 1261 E-pos: tekenn@thw.gov.za gestuur word op of voor 14 Oktober 2024 na die publikasie van hierdie kennisgewing, met vermelding van jou naam, adres of kontakbesoekadres, belang in die aansoek en rede of kommentaar. Telefoniese navraag kan gerig word na M.E. Moolman, Administrateur/Stadsbeplanning by 028 214 3300. Die Munisipaliteit kan weer om enige kommentaar te aanvaar weens die skuldigheid van oorsig word. Persone wie se kan skryf nie, kan by die munisipale kantoor aanmeld as 'n munisipale antennesel sal beskikbaar wees om die relevante kommentaar of inligting behoeftes te dokumenteer.

LOST OR DESTROYED DEED

Notice is hereby given in terms of regulation 68 of the Deeds Registries Act, 1937, of the intention to apply for the issue of a certified copy of Deed of Transfer ST4875/2018

passed by **PAULINE BONGERS** as Co-Executive and as Agent in terms of a Special Power of Attorney granted at Cape Town on 13 October 2017 by **ALLAN JOHN ROBERT BAKER**, in his capacity as Co-Executor in the Estate Late **BRIAN RAYMOND COLLINS** Number 15440/2017

in favour of **GETRUBA CAROLINA COLLINS**
Identity Number 3804260064086 Widow

in respect of 1. A Unit consisting of one half (1/2) share in Section No. 152 as shown and more fully described on Sectional Plan No SS 227/1995 in the scheme known as FYNBOS PARK in respect of the land and building or buildings situated at HERMANUS, IN THE OVERSTRAND MUNICIPALITY, DIVISION CALEDON, PROVINCE OF THE WESTERN CAPE, of which section the floor area, according to the said sectional plan is 46 (Forty Six) square metres in extent and

2. A Unit consisting of one half (1/2) share in Section No. 199 as shown and more fully described on Sectional Plan No SS 227/1995 in the scheme known as FYNBOS PARK in respect of the land and building or buildings situated at HERMANUS, IN THE OVERSTRAND MUNICIPALITY, DIVISION CALEDON, PROVINCE OF THE WESTERN CAPE, of which section the floor area, according to the said sectional plan is 18 (Eighteen) square metres in extent and

which has been lost or destroyed.

All interested persons having objection to the issue of such copy are hereby required to lodge the same in writing with the Registrar of Deeds at Room 1216, 12th Floor, 90 Plein Street, Cape Town within two weeks from the date of the publication of this notice.

Guthrie & Theron
77 Main Road Hermanus
028/214 3624
info@gtlnc.co.za

GUTHRIE & THERON
ATTORNEYS

OVERSTRAND MUNICIPALITY

TIME SCHEDULE FOR THE 2025/26 IDP REVIEW AND BUDGET PROCESS

Notice is herewith given in terms of section 21(1) of Local Government: Municipal Finance Management Act (56 of 2000), that the time schedule for the 2025/26 Integrated Development Plan (IDP) Review and Budget process was approved in Council on Wednesday, 28 August 2024.

The time schedule will be available during office hours at the offices of the Public Liaison Managers in Gansbaai/Stanford, Hermanus and Kleinmond, in all the public libraries in the Overstrand, the Corporate Head Office of the municipality in Hermanus and on the municipality's website at www.overstrand.gov.za

DGI O'Neill
MUNICIPAL MANAGER
Overstrand Municipality
PO Box 20
HERMANUS
7200

Notice number: 134/2024

#overstrand4all

OVERSTRAND MUNISIPALITEIT

TYDSKEDULE VIR DIE 2025/26 GOP HERSIENING EN BEGROTINGSPROSES

Kennis gegee hierna ingevolge artikel 21(1) van Plaatse Regering: Wet op Munisipale Finansiële Bestuur (Wet 56 van 2000) dat die tydskedule vir die 2024/25 Geïntegreerde Ontwikkelingsplan (GOP) Hersiening en Begrotingsproses goedgekeur is in die Raad op Woensdag, 28 Augustus 2024.

Die tydskedule is gedurende kantoorure beskikbaar by die kantore van die Openbare Skakeelbestuurders in Gansbaai/Stanford, Hermanus en Kleinmond, in alle openbare biblioteke in die Overstrand, die Korporatiewe Hoofkantoor van die munisipaliteit in Hermanus en op die munisipaliteit se webwerf by www.overstrand.gov.za

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Kantingsaansoeknommer: 134/2024

UNASIPALA WASE-OVERSTRAND

YISWANGGISO SEKESHA SENKQUBO
YISWAMA-2025/26 SOHLAZIYO LWÉ (IDP)
KUNYE NENGQUBUYEBHAJETHI

Esi sizaxiso esikhuthwa ngokwenzelano 21(1) loMethetho kaRuhukumente wezasekhaya: wolawulo lwMali kaUnasipala umthetho (56 ka-2000), sokuba siwangangisongqobu sawama-2025/2026 sohlaziyo lwisicwangciso soPhuhliso ohDibanyayo (IDP) nengqubo yohlahlo-lwabiwomali yamkhuba iBhunga ngolwesiThathu, umhla wama-28 Agasti 2024.

Esi siwangciso sekhesha siza kufunyaneka ngexesha laayure zorsebenzise kwii-ofisi zabalawuli eGansbaai/Stanford, Hermanus and Kleinmond, nakubo onke amathala e-overstrand, kwaNidunkulu kwanasipala eHermanus nakwi-webhusayithi ku-www.overstrand.gov.za

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Inombolo yesaziyo: 134/2024

We believe. We care. We serve.

6. NOTICEBOARDS

Noticeboards were placed on site, as required in terms of the legislation:





7. COMMENTS AND RESPONSE REPORT AND REGISTER FOR I&APS

A Register was opened during the first round of public participation, to list all I&APs which wished to be registered as such. The Register included contact details, date and comment made.

A Comments and Response report was also opened at the onset of the public participation. This report contains the comment made by the I&AP, as well as formal response by the Environmental Assessment Practitioner (EAP).



LORNAY
ENVIRONMENTAL CONSULTING

REGISTER FOR INTERESTED AND AFFECTED PARTIES

Erf 438, Stanford					
NAME:	ORGANISATION:	POSTAL ADDRESS:	TEL:	EMAIL:	DATE & REF:
Public participation 1					
James Aling	Stanford Heritage Committee	-	-	stanfordheritage@gmail.com mikemunnik001@gmail.com	25/09/2024
Peter Bysshe	Private	-	-	peter@bysshe.co.za	02/20/2024
Rulien Volschenk	Overberg District Municipality	-	-	rvolschenk@odm.org.za	04/10/2024 Ref. 18/5/5/10
Vhengani Ligudu	BOCMA	-	-	vligudu@bocma.co.za	07/10/2024 Ref. 4/10/2/G40L/ERF 438, STANDFORD, CALEDON RD
Rhett Smart	Cape Nature	-	-	rsmart@capenature.co.za	07/10/2024 Ref. LS14/2/6/1/7/2/438_residential_S tanford
SW Carstens	Western Cape Government – Infrastructure – Transport Infrastructure Branch	-	-	Vanessa.Stoffels@westerncape.gov.za	03/10/2024 Ref. DOI/CFS/RN/LU/REZ/SUB- 21/295 (Application: 2024-09- 0025)
Ntanganedzeni	DEA&DP Landuse	-	-	Ntanganedzeni.Mabasa@westerncape.gov.za	07/10/2025

Mabasa	Case Officer				Ref. 16/3/3/6/7/1/E2/37/1035/24
Sheraine van Wyk	Whale Coast Conservation	-	-	sheraine.wcc@gmail.com	08/10/2024
Cor van der Walt	Department of Agriculture	-	021 808 5099	cor.vanderwalt@westerncape.gov.za	29/10/2024 Ref. 20/9/2/4/2/968
James Aling	Stanford Heritage Committee	-	-	stanfordheritage@gmail.com mikemunnik001@gmail.com	06/05/2025
E. Lowings	Overstrand Aesthetics and Heritage Comm.	-	-	elowings@overstrand.gov.za	10/04/2025
Chester Arendse	Overstrand Municipality			carendse@overstrand.gov.za	06/03/2025
Pat Miller	Whale Coast Conservation	-	-	pat.miller7@outlook.com	26/05/2025
I&APS from Overstrand Planning Public Participation					
Nicolas Claude				NicodemusP@mail.com	
Bonnie Espie	Private			Bonnie@mwebbiz.co.za	
Richard (Dick) Randall	Resident	-	-	dick@nautilustours.co.za	
Val Myburgh	Resident	-	-	valburgh@gmail.com	
Su Wolf	Resident	8 Vlei Street, Stanford		wolpack@iafrica.com	
Elaine Teague	-	-	-	elainejteague@hotmail.com	
Greta Muller	18 Church Street, Stanford	-	-	egret5012@gmail.com	-
Liz Macmillan	-	-	-	lmac@mweb.co.za	
Barabara Martin				barbs@lonkirk.co.za	
Chris Wolf				chris@ips.co.za	
Liz Macmillan				lmac@mweb.co.za	
Stanford Conservation – John Kelly				irishjk@me.com	
ADDITIONAL I&APS as requested by Heritage Specialist					
Maureen				maureen@syringastud.co.za	
Katie Smuts				katie.smuts@gmail.com	



COMMENTS AND RESPONSE REPORT

PROJECT: Erf 438 Stanford

DRAFT BAR / PRE-APPLICATION

NAME:	COMMENT:	RESPONSE:	DATE & REF:
Stanford Heritage Committee James Aling	Email dated 25/09/2024 25 September 2024 Lornay Environmental Consulting Attention: Michelle Naylor By email: michelle@lornay.co.za Dear Michelle, RE: ERF 438 – BASIC ENVIRONMENTAL ASSESSMENT – REGISTRATION AS AN IAP Further to your notice of public participation process for the basic environmental assessment process to be undertaken on Erf 438, Stanford, for the proposed development, this letter serves as confirmation that Stanford Heritage Committee (SHC), a Committee of the Stanford Conservation Trust, would like to registered as an IAP and kept up to date with the progress and developments/outcomes of the basic environmental assessment process. Yours sincerely	Registered as I&AP No further action required	-

<p>Peter peter@bysshe.co.za</p>	<p>Email dated 02/10/2024 Request to be registered as an I&AP</p>	<p>Added to register</p>	<p>-</p>
<p>Rulien Volschenk Overberg District Municipality</p>	<p>Email dated 04/10/2024 RE: NOTICE OF PUBLIC PARTICIPATION FOR A BASIC ASSESSMENT PROCESS: PROPOSED RESIDENTIAL DEVELOPMENT, ERF 438 STANFORD, CALEDON RD The Overberg District Municipalities department of Environmental Management Services takes cognisance of the draft Basic Assessment Report. With reference to the Western Cape Biodiversity Spatial Plan, 2017 (WCBSP) the development footprint is not categorised as a Critically Biodiversity Area (CBA) nor an Ecological Support Area (ESA)> The current application fall within Agulhas Limestone Fynbos which is listed as Critically Endangered, but the site is mainly transformed due to historic agricultural use. The proposed development is situated with the urban edge of the Stanford area is zoned residential. The preferred layout, which incorporates a buffer between the wetland and the development footprint as well as protect the indigenous milkwood trees, is supported. The ODM therefore has no objection against the proposed development and support the mitigation proposal as stipulated in the specialists reports.</p>	<p>No action required</p>	<p>18/5/5/4</p>
<p>BOCMA</p>	<p>Email dated 07/10/2024 RE: APPLICATION FOR BASIC ASSESSMENT PROCESS FOR THE PROPOSED RESIDENTIAL DEVELOPMENT ON ERF 438, STANFORD CALEDON RD. With reference to the above-mentioned document received by this office on the 03/09/2024, requesting comments. The Breede-Olifants Catchment Management Agency (BOCMA) has no objections on the proposed application subject to the following comments: 1. This office assessed the application and noted that part of the property is within a Regulated Area (floodplain wetland). The Regulated Area is defined under section 21 (c) and (i) of the National Water Act (Act 36 of 1998) as: a) The outer edge of the 1 in 100 year flood line and/or delineated riparian habitat, whichever is the greatest distance, measured from the middle of the watercourse of a river, spring, natural channel, lake or dam;</p>		<p>-</p>

	<p>b) In the absence of a determined 1 in 100 year flood line or riparian area the area within 100m from the edge of a watercourse where the edge of the watercourse is the first identifiable annual bank fill flood bench; or c) A 500m radius from the delineated boundary (extent) of any wetland or pan.</p> <p>2. The following water uses in terms of Section 21 of the National Water Act, 1998 (Act 36 of 1998) may be applicable: Section 21 (c) – impeding or diverting the flow of water in a watercourse Section 21 (i) – altering the bed, banks, course or characteristics of a watercourse</p> <p>3. The proposed development will trigger section 21 (c) & (l) water uses in terms of the National water act and thus a water use authorisation application must be lodged with the Department of Water and Sanitation (www.dws.gov.za/ewulaasprod) before the development commences.</p> <p>4. As stated in the “Aquatic Biodiversity Screening, ERF 438 Stanford, Western Cape” report, a risk assessment matrix must be provided in terms of how high, medium or low the risk outcome is, to apply for the applicable authorization for the property.</p> <p>5. Kindly provide proof from the municipality confirming the capacity to provide water and manage wastewater from the development. The proof must be forwarded to this office.</p> <p>6. No activities may commence in the property without obtaining the required authorization.</p> <p>General Conditions:</p> <ul style="list-style-type: none"> • All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered to. • The disposal of sewage must at all times comply with the requirements of Sections 22 and 40 of the National Water Act of 1998, (Act 36 of 1998). • In the event of water abstraction from any water resource, the necessary authorisation must be obtained from this office of the Department. • No pollution of surface water or groundwater resources may occur. • Stormwater management must be addressed both in terms of flooding, erosion and pollution potential. • No stormwater runoff from any premises containing waste, or water containing waste emanating from industrial activities may be discharged into a water resource. Polluted stormwater must be contained. 	<p>3. The pre-application WULA has been submitted on the EWULAA system. A pre-application site meeting was held on 14 May.</p> <p>4. Included in the Freshwater Impact Assessment – a WULA is applicable as above.</p> <p>5. Service confirmations are attached under Appendix F6d and Appendix F6e of the BAR. All services are confirmed and available.</p>	
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	<ul style="list-style-type: none"> • Please note that engaging in activity that triggers the National Water Act without authorisation is an offence and will result in the BOCMA taking legal action against the proponent in terms of Section 151 of the National Water Act, 1998 (Act 36 of 1998). <p>This office reserves the right to revise initial comments and request further information based on any additional information that may be received. The onus remains with the registered property owner to confirm adherence to any other relevant legislation that any activities might trigger and/or need authorization. Please do not hesitate to contact the above official should there be any queries.</p>		
Cape Nature	<p>Email dated 08/10/2024</p> <p>Pre-Application Basic Assessment Report for the Proposed Residential Development on Erf 438, Stanford</p> <p>Cape Nature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.</p> <p>Desktop Information The property contains Ecological Support Area 1 and 2 (ESA) along the western and southern boundaries as mapped in the Western Cape Biodiversity Spatial Plan, with the remainder mapped as No Natural. The ESA is associated with the Mill Stream along the western boundary and a tributary along the southern boundary, with a floodplain wetland associated with these watercourses mapped in the National Wetland Map. The vegetation mapped for the site is Agulhas Limestone Fynbos, listed as critically endangered.</p> <p>The screening tool results indicate a very high sensitivity for terrestrial biodiversity and aquatic biodiversity, high sensitivity for animal species and medium sensitivity for plant species. A site sensitivity verification report has been compiled which indicates that an aquatic/freshwater impact assessment will address the aquatic biodiversity theme and a botanical/ecological specialist will be appointed to address the terrestrial biodiversity and plant species themes. For the animal species theme, it indicates that a stand-alone animal species assessment will not be undertaken, however the theme will be attended to by the ecological/botanical specialist and the freshwater specialist. The conclusion states that a botanical/ecological/plant species/terrestrial/animal specialist and a freshwater impact assessment will be appointed.</p>	<p>SSVR updated and the following specialists were and / or have been appointed on the project:</p> <ul style="list-style-type: none"> - Agricultural Compliance Statement - Faunal Impact Assessment - Botanical Impact Assessment - Aquatic Impact Assessment - Heritage Impact Assessment - Paleontological Impact Assessment - Archaeological Impact Assessment - Visual Impact Assessment 	

	<p>The specialist studies which have been undertaken however do not match with the recommendations of the site sensitivity verification report. The specialist studies undertaken are an aquatic biodiversity assessment and an amphibian report. The terrestrial biodiversity and plant species themes have not been addressed. Therefore, either the site sensitivity verification report should be amended to indicate why specialist studies have not been undertaken or specialist studies must be undertaken to address these themes (or can be combined). We wish to note that according to the protocols, if the terrestrial biodiversity is of low sensitivity, a terrestrial biodiversity compliance statement is still required.</p> <p>Aquatic Biodiversity Impact Assessment The aquatic biodiversity screening study undertook wetland ground-truthing. The wetlands associated with the Mill Stream and tributary were confirmed with the ground-truthed extent slightly larger and the classification of the wetlands as unchannelled valley bottom wetland rather than floodplain wetlands due to the lack of a channel. The remainder of the property is occupied by instant lawn farming which has resulted in artificial wetland conditions on the surface due to the introduction of foreign soil and compaction along with irrigation. However, a section of this area was confirmed to support natural wetland conditions due to the presence of hydromorphic soils at a deeper level. This wetland was classified as a hillslope seep wetland.</p> <p>The aquatic biodiversity impact assessment assessed the ecological condition and importance of the wetlands, with the unchannelled valley bottom wetlands rated as moderately modified present ecological state (PES) and high ecological importance and sensitivity (EIS), and the hillslope seep seriously modified PES and moderate EIS. The development layout avoids the unchanneled valley bottom wetlands and a 32 m buffer, however the hillslope wetlands are proposed to be developed with the motivation that this wetland is highly modified and does not support wetland habitat. The presence of the endangered Western Leopard Toad (<i>Sclerophrys pantherinus</i>) within the broader area is taken into account in the ecological value of the wetlands.</p> <p>Several impacts are identified and assessed. The impact of the loss of the hillslope wetland is rated as medium significance and no mitigation is considered feasible. The impact on altered flow and water quality of the unchanneled valley bottom wetlands for both construction and operational phase is rated as low significance prior to mitigation and water quality is reduced to very low after mitigation. The proposed mitigation measures are supported and should all be implemented.</p>	<p>As above and updated accordingly</p> <p>Aquatic Biodiversity Impact Assessment</p>	
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	<p>The residual impact (after mitigation) for the loss of wetlands of medium significance is within the threshold requiring an offset. A wetland offset is therefore recommended to remedy the loss of the wetland. However, the mitigation hierarchy must be applied before an offset can be considered. Avoidance should be the first option and therefore development layouts which avoid the hillslope wetland must be investigated before this option can be considered further. Should this not be feasible it will need to be well motivated. We further wish to note that two alternative development layouts have been presented however a comparison of the impacts has not been undertaken. Should it be confirmed that a wetland offset is the only feasible remedy, a wetland offset must be designed in accordance with the wetland offset best practice guidelines. It is important to note that the Stanford Eye is the source of the Mill Stream a short distance upstream of the site. The Stanford Eye along with two boreholes supply water to the town of Stanford and therefore is an important water source apart from the ecological importance. As the eye is upstream of the site it will not be directly affected by the proposed development. However, the water abstraction from the eye reduces the volume of water within the Mill Stream and therefore it must be ensured that measures are in place to prevent further reduction of flow in the system. We therefore recommend that the studies related to the water use of the Stanford Eye is taken into consideration in the assessment and the proposed offset, such as the hydrological assessment for the Mill Stream (Umvoto Africa 2016).</p> <p>Amphibian Report An amphibian report was compiled to identify the amphibian species present on site. Amphibian species which could potentially occur on site are listed based on existing records within the quarter degree square. Three amphibian species were confirmed present based on calls recorded over two evenings, all of which are listed as least concern. We wish to query if the record of the Common Caco (<i>Cacosternum boettgeri</i>) is in fact the <i>Cacosternum australis</i>. The only Species of Conservation Concern (SCC) in the list of species which could potentially occur is Western Leopard Toad, listed as endangered. The location of the three species were recorded is included in Figure 3 and includes the erf to the north (Erf 594). Records of bird species are also included. A number of mitigation measures are recommended to both encourage amphibians to occupy the site and proposed development and to minimize the potential impact. The report does not indicate whether it aims to address the animal species theme in accordance with the protocols. In this regard we wish to note that the focus should be on SCCs for the animal species theme and should include an evaluation</p>	<p>Avoidance of the highly degraded hill slope seep is not possible since it occupies a large portion of the property and with the avoidance of the other 2 systems, would result in the proposal becoming unfeasible. In addition, the specialist has found that this hillslope seep is highly degraded, and completely transformed with roll on lawn, with no natural habitat remaining. At present the proposed development area (as a whole) coincides with approximately 0.87 Ha of the seep. The seep has a PES score in the E category (Seriously Modified) and exhibits Moderate EIS. The wetland vegetation type is CR, although the fynbos onsite is considered highly degraded. There is also limited hydrological connection to the downstream Mill stream UVBW due to the seriously impacted hydrological, and geomorphology. An onsite offset is recommended by the Freshwater Specialist and will be completed as part of the WULA process. The remaining to wetlands and a 32 m buffer has been applied along with their proposed rehabilitation. The rehabilitation of these areas' forms part of the greater Mill Stream rehabilitation from the Eye to Stanford.</p> <p>Amphibian Report The Faunal Impact Assessment was undertaken and made comment to this. See Appendix F8b.</p> <p>See Appendix F8b for the full Faunal Impact Assessment report.</p>	
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	<p>of the species identified in the screening tool, while also providing information on the other species present which has been undertaken. Further confirmation should be provided regarding the potential presence of the Western Leopard Toad on site and the records from the surrounding area. This species which can occur within suburban environments as is observed in the Cape Peninsula provided that appropriate mitigation measures are implemented.</p> <p>The amphibian report can be considered equivalent to the aquatic biodiversity screening report by providing baseline information, however an impact assessment should be undertaken assessing and rating the impact of the two proposed development layouts. The impact assessment should address the other requirements of the protocols.</p> <p>Conclusion In conclusion, CapeNature recommends that the following must be addressed before the application can be considered further:</p> <ul style="list-style-type: none"> • The site sensitivity verification report must be amended to accurately reflect the outcomes of the site sensitivity verification in relation to the specialist assessments undertaken. The terrestrial biodiversity and plant species themes must be addressed in accordance with the protocols. • The mitigation hierarchy must be followed whereby avoidance of the loss of wetland must first be investigated in the proposed layout before a wetland offset can be considered. Should avoidance and the other steps of the mitigation hierarchy be adequately motivated to not be feasible, then a wetland offset must be investigated in terms of the relevant guidelines. We recommend that both the Overstrand Municipality and CapeNature are consulted prior to finalization of the wetland offset. • The amphibian report must be updated to an animal species impact assessment in accordance with the protocols. The potential presence of the SCCs in the screening tool must be assessed, with a particular focus on the Western Leopard Toad. • The two proposed development layouts (as well as layouts which avoid the wetlands) must be assessed and compared in the specialist assessments. 	<p>See Appendix F for the full Faunal / Animal Species Impact Assessment.</p> <ul style="list-style-type: none"> • The SSVR has been Updated • Wetland offset will be pursued onsite as recommended by the Freshwater specialist since no practical or feasible options to avoid the degraded hill seep are possible. • Animal Species / Faunal Impact Assessment has been completed and attached under Appendix F. • As per specialist reports. 	
<p>SW Carstens WCG Transport Infrastructure Branch</p>	<p>Email dated 08/10/2024 PROPOSED RESIDENTIAL DEVELOPMENT, ERF 438, STANFORD: COMMENTS ON DRAFT BASIC ASSESSMENT REPORT</p> <p>1. Letter 438SF to this Branch dated 04 September 2024 refers.</p>	<p>No further action required.</p>	

	<p>2. The subject property is in Stanford and takes access off Trunk Road 28 Section 2.</p> <p>3. This Branch offers no objection to the issuing of Environmental Authorisation in terms of the National Environmental Management Act 107 of 1998.</p> <p>4. This Branch will comment on the access upon receipt of the Land Use application.</p>		
DEA&DP Landuse	<p>Email dated 08/10/2024</p> <p>COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (“BAR”) IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (“NEMA”), 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT (“EIA”) REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED RESIDENTIAL DEVELOPMENT ON ERF NO. 438, STANFORD.</p> <p>1. The electronic copy of the draft BAR, as received by the Directorate: Development Management (“this Directorate”) on 3 September 2024, and the Directorate’s acknowledgement thereof issued on 12 September 2024, refer.</p> <p>2. Following the review of the information submitted to this Directorate, the following is noted:</p> <p>2.1 The proposed development of 27 single residential erven, one general residential erf for town housing, private open spaces, and associated infrastructure on Erf No. 438, Stanford.</p> <p>2.2 Erf No. 27 will accommodate a lodge for tourist accommodation, while Erf No. 28 will accommodate a guesthouse (with 10 beds). The lodge accommodation will be 16 freestanding pods located between in the Milkwood trees.</p> <p>2.3 The proposed development footprint is approximately 5.2ha in extent.</p> <p>2.4 Three wetlands were identified within the proposed site, including the Mill Stream wetland (classified as a Unchanneled Valley Bottom Wetland (“UVBW”), a small tributary thereof (also a UVBW) and a hillslope seep wetland within the onsite farmed area. The proposed development will be located within 32m of the watercourses present on the site and the preferred layout was designed to ensure that the Mill Stream and associated wetlands are incorporated into the development as a rehabilitated and functional green open space. 10 of the proposed erven along the wetland side, will include an Undevelopable Area which may not be developed. The aim of this “no development zone” is to prevent development and landscaping from extending into the 32m wetland buffer zone.</p> <p>2.5 Access to the complex will be through an entrance gate building, set back from the R43, in order to reduce the visual impact of a gated estate and permit traffic stacking.</p> <p>2.6 The site is mapped to contain Agulhas Limestone Fynbos and Elim Ferricrete</p>		

	<p>Fynbos vegetation, which are classified as critically endangered and endangered vegetation types respectively. However, the site contains an area with cultivated buffalo grass that is sold commercially as roll on lawn on northern portion; a Milkwood grove together with wild olive and large exotic species in the centre near the homestead; a patch of low indigenous shrubs and small trees typical of moist sandy soils in the southern portions; and a wooded portion of Blue Gums between the access road and the stream.</p> <p>2.7 The site is zoned Single Residential Zone and is located inside the municipal urban edge abut outside the urban area of Stanford.</p> <p>3. This Directorate’s comments are as follows:</p> <p>3.1 The recommended freshwater specialist mitigation includes “the implementation of a suitable a Wetland Offset, Rehabilitation and Management Plan”. Clarity is required with respect to what the wetland offset aspect entails. The Breede Olifants Catchment Management Agency (“BOCMA”) and CapeNature must confirm that the proposed maintenance and management of the onsite wetlands and buffer in perpetuity qualifies as a suitable offset for the loss of the hillslope seep wetland. This must be addressed and finalised as part of the basic assessment process and before submission of the final report for decision-making.</p> <p>3.2 Given the location of the development, its designation as an Urban Conservation area in the Overstrand Municipality, Environmental Management Overlay Zone (“EMOZ”) Regulations 2020, and considering that a portion of the site currently being used for agriculture, comments on the suitability of the proposed development must be obtained from the Overstrand Municipality, this Department’s Directorate: Development Management (Region 2), and the Department of Agriculture.</p> <p>3.3 A final comment must be obtained from Heritage Western Cape to confirm that the identified heritage impacts have been adequately addressed.</p> <p>3.4 The Maintenance Management Plan (“MMP”) that was included and submitted to this Department, does not meet the requirements of a MMP for adoption to enable future implementation of such maintenance related activities. The MMP is a legislative tool enabling the applicant to undertake certain permissible activities pertaining to maintenance related work only. It is imperative that the MMP is sufficiently detailed and, as a minimum, outlines the individually proposed future maintenance related activities, how, where and when these will be implemented, how the potential impacts associated with these actions will be prevented or minimised and the party responsible for such implementation. However, the method statements that have been included is limited and vague and lacks the necessary detail with respect to a step-by-step plan in a sequential and logical manner to inform the responsible person(s) on the process and actions to undertake when performing each identified maintenance activity, which aims</p>	<p>3.1. The wetland offset specialist has calculated that a onsite offset is appropriate, and the Wetland Offset Report is underway.</p> <p>3.2. Comment has been Received from DOA and Overstrand Municipality with no objection to the proposal.</p> <p>3.3 The Heritage process is currently underway with the Heritage Team.</p> <p>3.4 MMP has been updated and attached in the BAR</p>	
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	<p>to reduce the impact of undertaking the maintenance related work. The method statements in the MMP must therefore be updated and amended accordingly.</p> <p>3.5 Proof of submission of the application to the BOCMA and a copy of the WULA Information must be included in the BAR.</p> <p>3.6 Comment from, but not limited to the following Organs of State must be obtained</p> <p>3.6.1 CapeNature</p> <p>3.6.2 Heritage Western Cape</p> <p>3.6.3 BOCMA</p> <p>3.6.4 Department of Agriculture</p> <p>3.6.5 Overstrand Municipality</p> <p>3.6.6 DEA&DP Directorate: Development Management (Region 2)</p> <p>3.6.7 The relevant road authority/ies</p> <p>3.7 A comprehensive Comments and Response Report that includes all the comments received and the responses thereto must be included in the BAR. In addition, please ensure that copies of all the comments received are attached to the BAR.</p> <p>3.8 Proof of compliance with all the public participation steps undertaken, as required in terms of Regulation 41 of the NEMA EIA Regulations, 2014 (as amended) must be included in the BAR.</p> <p>3.9 In terms of Regulation 34 of the NEMA EIA Regulations, 2014, the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation, the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person (other than the Environmental Assessment Practitioner and Environmental Control Officer) and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014. Please advise what the estimated duration of the construction phase will be. In addition, you are required to recommend and motivate the frequency at which the environmental audits must be conducted by an independent person. This will be included as a condition should Environmental Authorisation be granted and therefore the proponent must confirm that the recommended frequency is acceptable.</p> <p>3.10 Please be advised that an original or electronically signed and dated applicant declaration is required to be submitted with the BAR to this Directorate. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to</p>	<p>3.5. The water use licence is currently underway and proof is attached under the BAR.</p> <p>Comment has been received from:</p> <p>3.6.1 Cape Nature</p> <p>3.6.2. HWC – Application pending</p> <p>3.6.3. BOCMA – Received, WULA and Wetland Offset pending</p> <p>3.6.4.DOA – Comment received, no objection</p> <p>3.6.5. Overstrand Municipality – comment received, no objection</p> <p>3.6.6. DEADP Land Use</p> <p>3.6.7. WC Roads – Comment received, no objection</p> <p>3.7. Completed</p> <p>3.8. As per proof of PPP document.</p> <p>3.9. The estimated construction phase time is not known as these can be hindered by a number of items which are currently unknown. Audits must be conducted every 6 months for the duration of the construction phase and one final closure audit.</p> <p>3.10. Noted</p>	
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	<p>implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.</p> <p>3.11 In addition to the above, please ensure that original or electronically signed and dated EAP and specialist declarations are also submitted with the BAR for decision-making.</p> <p>3.12 Omission of any required information in terms of Appendices 1 and 4 of EIA Regulations, 2014 (as amended) with respect to the final submission of the BAR and EMPr, respectively to this Directorate, may result in the application for Environmental Authorisation being refused.</p> <p>4 Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p> <p>5 Please note that the proposed development may not commence prior to an Environmental Authorisation being granted by the Competent Authority.</p>	<p>3.11. Noted</p> <p>3.12. Noted</p>	
<p>Whale Coast Conservation – Sheraine van Wyk</p>	<p>Email dated 09/10/2024</p> <p>Here is the comment following our last conversation on this property / proposed development.</p> <p>The new culverts that were installed in the R43 bridge upgrade were due to a plea I made to the Environmental Consultants (<i>on the road upgrade</i>) for the safe passage of fauna. This installation in effect reconnected the eastern arm of the Mill Stream to the west arm of catchment.</p> <p>To encourage the endangered Western Leopard Toad in particular to use these culverts, I have requested that an area of at least 5m (preferably 10m) be vegetated with indigenous, low stature wetland vegetation of low maximum height so that the culverts remain visible to the animals. This implies suppressing reed growth in this area. Initial restoration of the area will be done by Guillaume Nel Environmental Consultants (with permission of the land owner) but subsequent maintenance (by land owner) will need to keep this objective in mind please.</p> <p>I would also like to monitor the movement of the toads during the breeding season (July - Sept) to gauge how the animals are using the culverts please. This will require access to the property at night.</p> <p>Frog tourism holds an unrealised potential in Stanford and can potentially be done on the property. I am willing to assist with this in future.</p> <p>Regards Sheraine van Wyk</p>	<p>Conditions have been listed in the BAR under Section J of the BAR</p>	-
<p>Cor van der Walt</p>	<p>Email dated 05/11/2024</p>	<p>Noted – no further action required</p>	<p>20/9/2/4/2/968</p>

	<p>Letter dated 29/10/2024</p> <p>BASIC ASSESSMENT PROCESS PROPOSED RESIDENTIAL DEVELOPMENT: DIVISION CALEDON ERF NO 438, STANFORD</p> <p>Your application of 04 September 2024 has reference,</p> <p>From a Agricultural perspective the Western Cape Department of Agriculture has no objection.</p> <p>Please be advised that this office is a commenting authority and further discussion on your application must be taken up with the decision makers. Further consultation will only be considered when requested by the decision maker.</p>		
<p>Chester Arendse Overstrand Municipality</p>	<p>Email dated 06/03/2025 RE: Notice of Public Participation Erf 438 Stanford Your email dated 06th February 2025, please find attached comments from the Overstrand Environmental Management & Conservation Division regarding ERF 438: Environmental buffers: The proposed 32-meter wetland buffer, which is designated to become a private open space buffer is supported. The mitigation measures proposed in the Aquatic Biodiversity Assessment is supported and must be implemented. Services: The services plan indicates that the sewer line and sewer pump station will be located within the wetlands buffer area. The applicant should indicate what mitigation measures will be in place in the event of a pumpstation failure (mechanical or electrical) or sewer pipe burst. Comments from BOCMA regarding this location should also be obtained. The Municipality reserves the right to revise these comments based on the availability of new information.</p>	<p>Noted and as assessed by specialist team</p>	

Comments received in response to additional request for comment on the HIA to heritage conservation bodies			
<p>James Aling Stanford Heritage Comm</p>	<p>Email dated 06/05/2025</p> <p>RE: COMMENTS ON THE BASIC ENVIRONMENTAL AND HERITAGE ASSESSMENTS FOR THE PROPOSED DEVELOPMENT ON ERF 438, STANFORD</p> <p>The Stanford Heritage Committee has reviewed the town planning application for consent use and associated departures distributed by Overstrand Municipality as part of the public participation and the SHC has commented on this as per attached letter.</p> <p>Our comments on the two assessments include the following:</p> <p>1. Architectural Guidelines and Departures The development and proposed site development plan and accompanying architectural guidelines have been viewed as a stand-alone development detached from the heritage section of Stanford in a similar light to the other two residential estates in Stanford, namely, Klein River estate and Stanhaven situated on the eastern side of the R43, where Erf 438 is located. As such we have consented to the departures requested as per the attached letter/email to Overstrand Municipality and would like to architectural guidelines to be sympathetic to the adjacent architectural form and structure of the village and other residential estates. We would want to have sight and comment of the final architectural guidelines once finalised.</p> <p>2. Adherence to NHRA We have been led to believe that the existing structure on the Erf is older than 60 years. Adequate assessment is required to motivate for its demolition.</p> <p>3. Leiwater / Millstream and Environmental Considerations -The leiwater and wandelpad comprise central elements of the Stanford cultural landscape, and contribute to the sense of place of the village. -A water use management plan should be put in place to monitor water runoff and usage into and from the Millstream both during and after construction.</p> <p>The Millstream Master Plan, which the municipality has both endorsed and provided funding towards, indicates the Millstream north of the R43 as a proposed Nature Reserve, with the intention to extend the wandelpad to the Stanford Eye.</p> <p>☒ We object, as have other organisations in Stanford such as Stanford Rate Payers and Stanford Conservation that the portion of the development adjoining the Millstream being fenced off for private use only. The development should find</p>	<p>1. Noted</p> <p>2. The HIA Concludes the following - The existing house on the site, which has no heritage value. Although it may be older than 60 years, the structure is determined to be Not Conservation-Worthy (NCW) - Figures 5.1 to 5.3.</p> <p>3. This impact has been assessed and addressed By the Freshwater Specialist and associated management plans as attached under the BAR. Mitigation and management measures are provided for in both the Freshwater Impact Assessment report and Wetland Offset Report.</p> <p>Comment is noted. The Millstream and its adjacent wetlands both on and offsite will be rehabilitated and form part of the Wetland Offset project component. With respect to monitoring, servitudes, and access, it is noted that the Stanford Conservation Trust (SCT) has proposed the establishment of a servitude along the Millstream to expand the wandelpad. Erf 438 Stanford is privately owned, and the registration of public servitudes over private land is not</p>	

	<p>ways to allow public access and thoroughfare that does not compromise security, so that this proposal can be realised, and the resource enjoyed by the whole village. To allow monitoring and inspection of the water resource, a municipal servitude should be created over the watercourse (possibly below the 15m contour) to ensure no unauthorised utilisation of the water from the Millstream. This will also facilitate public access through the property.</p> <p>3. Naming As highlighted in our comments on the town planning application, calling the new development “Stanford Green” is entirely inappropriate as it disregards and undermines the uniqueness of the Grade IIIA Stanford Village Green and as such another more suitable and appropriate name should be sought by the developer. We trust these comments and concerns will be fed into the finalisation of the two reports.</p>	<p>considered appropriate in this context. The southern bank of the Millstream, however, located on Erf 294, Stanford, is owned by the municipality and zoned as Public Open Space. This area would be ideally suited to allow public access to the Millstream, as envisaged in the Millstream Master Plan. The applicant is willing to contribute to the funding of possible raised boardwalks and upgrades to the trail on Erf 294 Stanford.</p> <p>The name has been changed in response to comments and concerns received.</p>	
<p>Overstrand Aesthetics and Heritage Comm</p>	<p>Letter dated 10 April 2025</p>	<p>Noted</p>	

	<p>6.2 STANFORD : ERF 438 : R43 : SERISO 324 CC : PROPOSED SUBDIVISION, CONSENT USE, DEPARTURE, STREET NAMES (DEVELOPMENT EXCEEDING 5000m² (@ 52508m²), HPOZ & CONSERVATION AREA) DISCUSSED. NICHOLAS CLARK RECUSED HIMSELF.</p> <p>Comment: Town Planning & HIA application authorized by Wrap Project Office dated 20/3/2025, application ID: 4738/2024 scrutinized. Supported, especially the proposed low density residentially scaled development. "Stanford Green" name not supported, already taken by the listed Public open space/commonage in Stanford. Note that it has come to our attention that a structure older than 60years ungraded occurs on the property.</p> <p>Action: Survey & motivation for demolition to be submitted to HWC.</p> <p>NEXT MEETINGS : 15th MAY, 12th JUNE & 10 JULY 2025</p>		
<p>Pat Miller Whale Coast Conservation</p>	<p>Email dated 27/05/2025</p> <p>Dear Michelle</p> <p>COMMENT ON PRE-APPLICATION / DRAFT BASIC ASSESSMENT REPORT PROPOSED RESIDENTIAL DEVELOPMENT ON ERF 438, STANFORD, CALEDON DEADP Ref - 16/3/3/6/7/1/E2/37/1035/24</p> <p>The proposal outlined in the Basic Assessment Report (BAR) is for changes to a piece of highly environmentally-sensitive land, containing as it does - on land classified as Critically Endangered – firstly, three identifiable wetland areas and secondly, a remnant milkwood forest. The land is privately owned. It presents a sad case of abuse and neglect. Although zoned for private residential use it has been used for agricultural purposes for many years, specifically for the production of roll-on lawn. This use has severely degraded a large wetland area known as the Hillside seep. Runoff from this use has also negatively impacted water quality in the two other wetland areas, most notably in the Millstream and environs.</p> <p>Wetlands are protected under environmental legislation. The municipal officials who allowed these transgressions against both the legislation and the zoning regulations should be taken to task for their extreme negligence.</p> <p>The remnant milkwood forest has also been the victim of environmental neglect, illustrated (for example) by the presence of many Alien Invasive Plants (AIPs), some of which are by now large mature trees and which are also present in quantity in the wetland areas. The plans for the property are to return it to the correct zoning application and address some of the environmental issues. This will enable it to be marketed as a residential estate with a tourism component.</p> <p>1. Issues of concern Whale Coast Conservation (WCC) welcomes the reversal in use to the correct</p>		

	<p>zoning and voiced commitment to addressing the most egregious of the environmental problems. However, there are a number of issues that raise serious concerns. These include:</p> <p>1.1 Inadequate mitigation of loss of Hillside seep Wetlands are protected by environmental legislation. The functioning of the Hillside seep has been severely compromised by its use over many years as a site for the production of roll-on lawn. The proposal is to accept this degradation as a fait accompli and use the area for a housing development. The sale of such will no doubt be much more profitable for the owner than the continued unlawful production of roll-on lawn. However, building houses on this area will of course totally destroy any opportunity for rehabilitation or improvement of the ecosystem services of the seep area. In exchange for the total loss of the Hillside seep, the proposal is to protect the environs of the second wetland area, namely the Millstream and its surroundings from encroachment by the houses to be built on the areas adjacent to it. This is however nothing more than is demanded by the legislation that protects wetlands. WCC is of the opinion that this is inadequate mitigation for the loss of a wetland area, however badly compromised.</p> <p>1.2 Inadequate acknowledgement of the vegetation rating of the area The terrestrial vegetation of the site is classified as Critically Endangered and Poorly Protected, comprising largely Agulhas Limestone Fynbos with a small area of Elim Ferricrete Fynbos. A full biodiversity impact assessment should have been done, rather than/as well as the Landscape Development Plan that has largely determined the nature of the ecological component of the proposed development. Even in areas that have been severely neglected over many years, fynbos plants and their seeds will generally be dormant and under the right conditions will reappear. This offers an opportunity for true eco-tourism, where clients can observe the restoration of previously degraded areas and be informed of (and possibly participate in) progress to this end. One essential component of such restoration is the removal of AIPs and the planting and encouragement of local indigenous plants, particularly those associated with the vegetation type.</p> <p>1.3 Inadequate protection for the remnant milkwood forest White Milkwoods (<i>Sideroxylon inerme</i>) are a protected tree species. Part of the property is home to a remnant milkwood forest. Before human encroachment destroyed the vast part of it, much of this coast housed an extensive interconnected swathe of milkwood forest inland from the dunes. Milkwoods are social trees with branches that intertwine with each other to provide mutual support and a dense canopy that protects against damaging onshore winds, providing inter alia a sheltered environment for young trees - a healthy forest will include a mixture of trees of various ages. Apart from the presence of a mix of</p>	<p>The Freshwater Specialist delineated and assessed all three wetland areas on site and found that the Hillslope seep wetland has been significantly impact and hardened for the roll-on grass business. The wetland assessment calculated for the loss of this highly degraded seep as part of the wetland offset proposal and recommended that the remaining 2 wetlands be excluded from development and rehabilitated. In addition, the area on the west of the Millstream which is currently highly degraded and used for contractors camp is included in the wetland offset proposal for the project and therefore will be rehabilitated and managed as per the Freshwater impact Assessment requirements.</p>	
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	<p>trees of varying ages, key to a functioning forest is non-disturbance of the root systems. Plans for the property include making this remnant forest a tourism feature by providing accommodation in the forest by means of a series of small “pods” scattered through it. Page 39 (e.g.) notes that “The environmental services provided by the canopy area (Shade, wind break, sense of place) are taken advantage of to provide an ‘eco-tourism’ opportunity.”</p> <p>Elsewhere and frequently, this concept is posited as an opportunity to conserve the forest. However, it is merely an approach that provides a “photo-ready” backdrop for tourists. Whereas it may provide a backdrop for an attractive accommodation opportunity, it will continue the inexorable decline of what remains of the forest, rather than increase its viability.</p> <p>2. Recommendations</p> <p>Given the above, WCC recommends primarily that the tourism component of the proposal is reworked. This should include the following:</p> <p>2.1 Concentration of accommodation in the lodge</p> <p>The “Pod” concept offering accommodation within the forest will be damaging to the forest’s recovery and functioning. A considerable area of the whole will be covered by the pods – although much is made of their non-foundational construction, infrastructure and access for these 34 beds will add to their footprint considerably.</p> <p>Tourist accommodation should be concentrated in the lodge building to be built on the existing footprint, which can be redesigned to offer more beds.</p> <p>2.2 The full restoration of the milkwood forest without accommodation</p> <p>The full restoration of the milkwood forest as a functional natural environment would go some way to mitigate the complete loss of the Hillside seep wetland area. As noted, the plan to introduce “Pod” accommodation within the forest is directed solely at the tourist market rather than ecological restoration. It will compromise the forest’s viability further.</p> <p>2.3 Development of a plan for forest restoration</p> <p>A comprehensive plan should be developed for the full restoration of the forest.</p> <p>As noted on page 46 of the BAR, “A forest must be in a “largely natural and functional condition” in order to meet biodiversity target(sic) (and that) these trees do provide habitat for a number of birds and other small species.” The plan will thus need to take into account the promotion of biodiversity in the forest area, as plants other than trees are essential to its ecological functioning.</p> <p>The milkwoods are the dominant but not the only plants in the forest, and a mix of other indigenous tree species such as wild olives must also be part of the restoration plan. Propagation and planting of young trees of various species should also be included in the plan, as a healthy forest will include trees of various</p>		
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	<p>ages. This plan must take into account the growth pattern of the milkwoods and their need to accommodate the development of a supportive lattice. In order to facilitate this, the root networks also are highly interdependent and need protection.</p> <p>The plan must also include the removal and disposal of AIPs within the area of the forest. This of course does not replace the legislative onus on the owner to remove and dispose of all AIPs elsewhere on the property, particularly those in the riparian area of the Millstream.</p> <p>2.4 Development of tourism facilities in the forest</p> <p>The full restoration of the forest area presents possibilities for non-accommodation tourism experiences based in the forest, such as birdwatching and guided walks and may entail the development of boardwalks and signage. Tourists could also be offered the opportunity to participate in the restoration of the forest by (e.g.) planting trees.</p>		
Comments received via the Municipal Public Participation on the Landuse Planning Application and Heritage Application			
Nicolas Claude	<p>Email dated 28/03/2025</p> <p>Request to be registered as I&AP</p>	Added to the list of registered I&APS	-
Bonnie Espie	<p>Email dated 21/04/2025</p> <p><i>Comment submitted as part of Overstrand Municipality Planning Application process</i></p> <p>Dear Alida Conradie, and Chairman (Stanford Rate Payers Association),</p> <p>I am a resident of Stanford and would like to submit my comments regarding the proposed development: STANFORD GREEN on Erf 438.</p> <p>1. <u>The name - Stanford Green</u></p> <p>We already have a Stanford Green, well known by residents and visitors alike. It's an important Heritage site and the proposed name of this development will cause confusion as well as denigrate the existing Historical Village square.</p> <p>Allowing this development to be called Stanford Green would be a distorted representation of what it actually is.</p> <p>2. <u>The site area</u></p>	The comment was submitted in response to the Landuse Planning Application and not the Environmental Authorisation application.	-

	<p>This site has already been identified by the municipality as having a unique eco system with plans in place to extend it as part of the Wandlepad which is open to the public. The Wandlepad forms part of the attractions of Stanford and allowing this development will mean this enhancement of the Wandlepad would be lost forever. These plans will be thwarted if the development goes ahead.</p> <p>3. <u>Water</u></p> <p>I have concerns about increasing usage of water for additional residential purposes thereby reducing the quantity and quality of water flowing into the mill-stream.</p> <p>Stanford gets water from a natural source referred to as Die Oog. Have impact studies been done to ensure this source can cope with this additional load of residential homes drawing water? This development will add additional water usage not only by normal use in new homes, but in developing new gardens and extensive landscaping as promised. Not forgetting the predicted new hotel residents and tourists expected to visit this proposed development.</p> <p>The run-off of this water will wash fertilizers into the mill stream and exacerbate the ongoing problem of reeds choking the river. Has a study been done re: the harm of fertilizers to the frog life?</p> <p>Stanford already has an approved development of 700 hundred new homes in Stanford South which will impact on water resources.</p> <p>Increased water usage will affect the volume of water available for the preservation of Stanford's aquatic life.</p> <p>The below text is taken from the opening paragraph of the proposal, and it points out the <i>'flourishing rural'</i> aspect and the <i>'meandering Klein River'</i> and an <i>'old village with historical feature being retained and preserved.'</i></p> <p>How exactly does this development enhance these precious points?</p> <p>Then ironically mentions the 'countless new homes. <i>'These countless new homes are already drawing on the precious water source.'</i></p> <p>If we run out of water, all this beauty etc will be lost.</p>		
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	<p>Water is a finite resource. The growth of Hermanus and the impact on their water supply is a well documented indication of what happens to a finite resources.</p> <p><i>Stanford is a flourishing farming community with the Klein River meandering through lush fields and village homes built along its banks. The rural atmosphere of the old village with its many historical features has been retained and preserved. Stanford has a peaceful and quiet charm that has drawn many people from the city in search of the quality of life a small village and the surrounding area offers. Many of the old homes have been renovated and restored and countless new homes have been built in Stanford in the past decade .</i></p> <p>The above is evocative writing! Stanford's current state matches this description.</p> <p>But a development such as the one proposed on Erf: 438 does not add to this old village, quite charm, rural farming community in anyway.</p> <p><u>4. Sewerage</u></p> <p>Have studies been done of the extra load on this resource?</p> <p>The sewerage eye at the bottom of King Street regularly overflows unable to cope. Worst still it overflows into the river! This is a massive health issue to both humans and aquatic life.</p> <p><u>5. Hotel</u></p> <p>The development proposes a hotel. Stanford has an already under-utilised hotel. Is there valid justification for another?</p> <p><u>6. Education</u></p> <p>The development mentions the offer of an educational centre. This too already exists. The Grootbos Foundation is a non-profit company, established in 2003. Their vision is on the Conservation of the Cape Floral Kingdom and the upliftment of the communities therein. They are an NGO and the emphasis is on non-profit!</p>		
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	<p><u>7. Employment</u></p> <p>This development is aimed at the top end of the earning demographics. How would the local community benefit? I do not believe building a hotel and a restaurant and guest house etc will bring the suggested employment. The current restaurants in the village struggle to make ends meet. How does the developer propose to make their offering different? What makes the developer believe their restaurant, hotel will be bustling with patrons?</p> <p><u>8. Building lines</u></p> <p>The request to relax building lines and building heights, opens the flood gates for leniency for other developments. The attraction of Stanford is that we do have strict Heritage guidelines making for a cohesive feel to the village.</p> <p>Overall, this development aim at the needs of the upper end of earning demographics and brings with it all the elements that ironically people are trying to escape.</p> <p>Yours sincerely, Bonnie Espie</p>		
<p>Richard (Dick) Randall</p>	<p>Email dated 22/04/2025</p> <p><i>Comment submitted as part of Overstrand Municipality Planning Application process</i></p> <p>With reference to the Application for the rezoning, subdivision, consent use, departure and allocation of street names, I wish to submit our objections with reasons, to this application. Paragraph 4. Objection. The proposed name of ‘Stanford Green Eco Lifestyle Estate’ should not be permitted. Reason. The Heritage Village of Stanford already has a ‘Stanford Green’, this is part of the history and heritage of the village and has been for the past 168 years. Paragraph 5.2.2 Density.</p>	<p>The comment was submitted in response to the Landuse Planning Application and not the Environmental Authorisation application.</p>	

	<p>In the proposal it is stated that the increase in housing density is an increase of 4.2% in 2026 in tabular format, as shown below.</p> <p>The above table is copied into from the Proposal document.</p> <p>Objection. The above table is an extract of the OMSDF Table 2.10 on page 28.</p> <p>In paragraph 2.4.11 Future Housing Needs of the OMSDF it states that the calculations are based on the number of households' living in informal structures and in overcrowded conditions.</p> <p>Table 2.10 on page 28 clearly states that the numbers are for the indigent population.</p> <p>Reason. These figures are not representative of the general population growth and cannot be used as a reason for this project to go ahead.</p> <p>Paragraph 5.2.4 Green, well-being focused development.</p> <p>In the proposal there is the statement: Sustainable landscaping using only indigenous vegetation.....</p> <p>Objection: 'Indigenous vegetation' could mean plants that are found only in South Africa.</p> <p>Reason: The Wording should be: Sustainable landscaping using only ENDEMIC VEGETATION FROM THIS AREA. The landscaping must be done under the supervision of a local botanist/ecologist who knows and understands this area.</p> <p>Paragraph 5.2.5 Millstream Integration.</p> <p>Full compliance with the Millstream Master Plan. Comply with and integrate into the Stanford Nature Reserve with public access to the Millstream for the continuation of the Wandelpad from R43 to 'Die Oog' and the possible establishment of a Bird Hide.</p> <p>No modification to the Millstream banks or hindrance to the flow of water form "Die Oog" or the Leiwater system. Strictly no deviation or permits for the altering of the water course or hindrance of flora or fauna.</p> <p>Paragraph 5.2.10 Height restriction.</p> <p>Permeant Departure from the provisions of 18.4 of the HPOZ regarding maximum height in terms of Section 16(2)(b) of the Overstrand amendment By-Law on Land Use Planning. 2020.</p> <p>Proposed departure from 6.8m to 7.15 m</p> <p>Objection: There should be NO DEVIATION on the height restrictions at all. All roofs should comply with the building regulation as set out in the HPOZ</p> <p>Reason: The HPOZ building height has been put in place to preserve the aesthetics and historical value of the buildings in Stanford i.e. the Stanford Style.</p> <p>The use of the deviation for Klein Rivier Estate and Stanhaven as an argument for</p>		
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	<p>the deviation is null and void as these two areas are not in HPOZ.</p> <p>Paragraph 15.1.2 OMSDF. The figures quoted under this section although correct, the conclusion is incorrect. The figure on page 90 of the OMSDF of an additional 1088 dwelling units by 2031 INCLUDES the indigent/low cost housing of 953 as quoted on page 28 table 2.10 Taking the figure of 1088 and subtracting the indigent housing of 953 requirements then a figure of only 135 dwelling units additional are required outside of the low cost housing area. That equates to approximately 20% and not the quoted figure of 2.48%.</p> <p>Objection: The incorrect conclusion arrived at from the use of the figures quoted in the OMSDF for the amount of dwelling units.</p> <p>Additional Notes: There MUST BE at least 3, preferably 5, COMPLETELY INDEPENDENT and COMPETANT people from Stanford appointed to oversee the complete construction to ensure that ALL the areas of this development adhere strictly to ALL the conditions laid down. The appointed people must be in NO way connected to the developer in any way what so ever, either as a relative, friend, acquaintance or employee.</p>		
<p>Val Myburgh</p>	<p>Email dated 22/04/2025</p> <p><i>Comment submitted as part of Overstrand Municipality Planning Application process</i></p> <p>ERF 438, STANFORD: APPLICATION FOR REZONING, SUBDIVISION, CONSENT USE, DEPARTURE AND ALLOCATION OF STREET NAMES: MESSRS WRAP PROJECT OFFICE ON BEHALF OF SERISO 324CC</p> <ol style="list-style-type: none"> 1. The applicant has requested various changes to the building boundary restrictions. These have been in use in Stanford for decades with good reason. Changing them for one person will set a precedent in the village, thus changing the “rural atmosphere of the old village” which he himself has mentioned. 2. The applicant proposes an hotel in the development. This would be excessive as there is already a working, underutilised hotel in Stanford. 3. Stanford has an existing water pressure problem which will be 	<p>The comment was submitted in response to the Landuse Planning Application and not the Environmental Authorisation application.</p>	

	<p>exacerbated by the addition of 27 dwelling units, the hotel, the guest house, the spa, the conference centre, all of which will require water. Because of the proximity of this development to the Oog, it is probable that the applicant will siphon off the water before it can reach the rest of the inhabitants.</p> <p>4. There are in the region of 700 houses in the process of being built in Stanford South, all of which will require access to water for basic needs. Families have waited for decades for these houses and should be given preference over an upmarket development using excessive amounts of water for pleasure.</p> <p>5. This development will put considerably more pressure on Stanford's already compromised sewerage system. Currently there are regular overflow sites especially in winter and during power cuts.</p> <p>6.</p> <p>7. The applicant proposes an information centre and facilities for outdoor learning. These would also be superfluous as there is the internationally acclaimed Grootbos a few kilometres away. They fulfil a variety of community needs in the form of education, training and job creation whilst still retaining the integrity of the environment.</p> <p>8. In order for this development to proceed, a considerable number of blue-gum trees will have to be destroyed. Whilst acknowledging that these trees are alien to the area, it is also important to recognise the crucial part they play as a food source for our bees. Bees worldwide are becoming endangered, so contributing to their demise in this environmentally friendly location would be anathema .</p> <p>9. Since the arrival of the applicant in Stanford, he has acted in bad faith on numerous occasions, blatantly ignoring local regulations and restrictions. The mere fact that he wishes to change Stanford's building boundaries to suit himself is evidence of this. A further example of the applicant's deceitful behaviour can be found in Cape High Court case number 6931/2005, Rex Optimum Investments vs Professional Yacht Management.</p> <p>10. Should this development be approved, I would strongly suggest that a team of qualified Stanford residents be appointed to closely monitor its progress, at every stage.</p> <p>Val Myburgh</p>		
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	Stanford resident		
Su Wolf	<p>Email dated 23 April 2025</p> <p><i>Comment submitted as part of Overstrand Municipality Planning Application process</i></p> <p>Dear Alida,</p> <p>As a resident of Stanford, I would like to lodge the following comments in respect of the proposed rezoning, subdivision and departures applied for Erf 438.</p> <ol style="list-style-type: none"> 1. The proposed name of Stanford Green is not appropriate - we already have a Stanford green and this will just create confusion. 2. I strongly object to the height departure The development falls within the HPOZ and should therefore conform to the Stanford Style guidelines. This allows for a maximum ridge height of 6.8m above base level. This height allows for full use of a loft space. It also conforms to the recommendations of the Heritage Impact Assessment. This departure could set an undesirable precedent for future developments. 3. The wall plate height departure can be allowed only if that roof slopes conform to the stipulated range for structures within the HPOZ, i.e. minimum 30 degrees, maximum 45 degrees. 4. Boundary walls should conform to those named in Stanford Style, i.e. 1.8m to the street building line, and 1.2m beyond that. 5. Fencing off the Mill Stream where it runs through the property cannot be approved, unless free public access through that area is provided. The Mill Stream Master Plan has been endorsed, and partly funded, by the Municipality, and foresees this area as a Nature Reserve, with the extension of the Wandelpad through this area to Die Oog. Fencing this off from public access will forever prevent this outcome from being realised. <p>The Municipality should create a servitude over the Mill Stream where it passes through the erf, partly to ensure continued public access, and partly to allow for municipal inspection of the condition and integrity of this public resource where it flows through private land. This will ensure that at no water is illegally taken, or the flow of the water tampered with as this would have a negative impact on the</p>	<p>The comment was submitted in response to the Landuse Planning Application and not the Environmental Authorisation application.</p>	

	<p>integrity of the vlei, and go against what the Millstream project is trying to achieve.</p> <p>While I appreciate that development is inevitable I do think that what Stanford needs more than more upmarket housing and lodge accommodation is affordable, attractive housing for the ‘middle income group’, people like teachers or young families starting out.</p> <p>Thank you - Su Wolf 8 Vlei Street, Stanford</p>		
Elaine Teague	<p>Email dated 23/04/2025</p> <p><i>Comment submitted as part of Overstrand Municipality Planning Application process</i></p> <p>OBJECTIONS TO PROPOSED DEVELOPMENT</p> <p>Traffic, congestion at the entrance to the village is currently a regular problem with the influx of visitors; additional housing will add considerably to this problem Schools in the village are severely overcrowded Doctor – there is no doctor practicing in the village Food retail outlets – do the current retail outlets have capacity for additional permanent residents Employment – serious shortage of employment in Stanford Overall impact on the Heritage Village of Stanford and using the name of the Heritage “Green” is disrespectful of the unique Stanford Heritage Village Green The village as a whole was declared a Heritage Site. Stanford is regarded by Heritage Western Cape as the third best preserved village in the Western Cape. The ethos of Stanford will be detrimentally impacted by the building of a modern security village making this beautiful village just another suburban area lacking charm and character</p> <p>Elaine Teague Resident of Stanford for 20 years</p>	The comment was submitted in response to the Landuse Planning Application and not the Environmental Authorisation application.	
Greta Muller	Email dated 24/04/2025	The comment was submitted in response to the Landuse Planning Application and not the Environmental Authorisation application.	

	<p>As a resident of Stanford, I would like to register the concerns that I have about the planned new development.</p> <p>First of all, I feel that the use of the name Stanford Green Eco Lifestyle Estate is entirely inappropriate. We already have a village green in Stanford. To my knowledge this is one of the few village greens in South Africa and has heritage status. I strongly object to the use of the name and, should the development plan be adopted, would urge that the name be something more in keeping with the fact that it is not exactly within the bounds of the village as we know it - and nor is it adjacent to the green.</p> <p>It is claimed that the proposed development will fit in with the old look of Stanford. However, leniency has been applied for in terms of the building line and roof height. Sure, many of the old houses were built right on the street but there is no need for leniency as regards the lateral building line – unless the intention is simply to build more houses on the space available.</p> <p>Stanford already has a hotel which to date has been underutilised. I do not see the need for a second hotel, nor for a conference facility, as this is not in keeping with the atmosphere of Stanford. While the planned glass pods may be wonderful in another setting, in no way do they fit in with the village feel of Stanford.</p> <p>A big concern is that of adequate water availability. I recognise that we have a constant supply of water from Die Oog, but many who have lived in Stanford for a long time can recall having way better water pressure than we do now. Each additional dwelling puts extra strain on the supply and I fear that we will, in time, outgrow it.</p> <p>Mention is made of the green spaces related to the Millstream. Are they to be kept as recreational areas within the development or will they be accessible to the greater community of Stanford?</p> <p>I see that leiwater is planned for the new houses. It might be noted that the houses in Stanford that are currently entitled to leiwater (and pay for it, albeit a nominal amount) are quite frequently unable to obtain water when their turn arrives because it has been needed elsewhere. Will these new houses just siphon</p>		
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	<p>off the little that remains?</p> <p>To my knowledge the sewage treatment facility at Stanford is already stretched to its limit. Will the new development have its own facility or will the current one be upgraded at the expense of the developers of the new housing?</p> <p>The proposal describes Stanford as a beautiful old village with a rural atmosphere and many historical features. This is what attracted so many of its current residents. Sadly, it now appears that people are moving to the village intent on changing it to become much like the places from which they came in the first instance.</p> <p>As a Stanford resident, I strongly object to this development as I believe that this is merely another step towards destroying the place that we have come to love.</p> <p>Sincerely yours,</p> <p>Greta Muller</p> <p>18 Church Street, Stanford</p>		
Liz Macmillan	<p>Email dated 25/04/2025</p> <p>As a resident of Stanford I wish to object to the above development for several reasons.</p> <p>As stated in the proposal submitted by the developer of ERF 438, Stanford is described as follows: “ Stanford is a flourishing farming community with the Klein River meandering through lush fields and village homes built along its banks. The rural atmosphere of the old village with its many historical features has been retained and preserved. Stanford has a peaceful and quiet charm that has drawn many people from the city in search of the quality of life a small village and the surrounding area offers. Many of the old homes have been renovated and restored and countless new homes have been built in Stanford in the last decade.”</p> <p>I do not believe the proposed development enhances the peaceful, quiet charm and quality of life of a small village in any way. To enter the estate will require one to go through an entrance gate appropriate for a town house development in</p>	The comment was submitted in response to the Landuse Planning Application and not the Environmental Authorisation application.	-

	<p>a town or city, not a style in accordance with a historical village AND located on a road designated a scenic route.</p> <p>The municipality itself describes this area as having a unique eco system encompassing the Millstream and Milkwood forests. If this area is indeed unique then it should be left untouched not developed and disturbed by a housing estate. The developer wishes to build what is described as “Pods” in amongst the Milkwoods, but these structures are shown in the design drawings as glass and steel squares which in no way blend into or enhance a forest setting. They are not, as is stated, going to blend seamlessly with the historical and aesthetic context of the town.</p> <p>The Millstream leading from Die Oog is undeniably unique and this eco system, home to the endangered Leopard Toad, is inevitably going to be polluted by the ongoing construction with run off from cement, sand, paint and other building materials. Once the homes are built and open areas and gardens are being developed the fertilisers and chemicals are bound to be washed into the stream to its detriment. It has already been established that the fertilisers used in farming have increased the growth of the invasive reed all along the Klein River and the Millstream is already compromised by reed invasion.</p> <p>With the already increased water usage due to housing development over the last few years, I wonder how much another new development will impact the water supply in Stanford. With so much water being needed for domestic use already will the Mill Stream receive enough to keep it flowing and flourishing? I understand that the Leiwater system in the village relies heavily on excess water from Die Oog. According to some of those villagers who use the Leiwater for the irrigation of their gardens, this system is no longer reliable, due to the fact that already there is not enough excess water available.</p> <p>The Millstream Rehabilitation project is expected to start sometime soon and the Village residents were led to believe that the existing Wandelpad was to follow the path of the Millstream up to Die Oog. With the development of Erf 438 the security fencing enclosing it will restrict the residents and visitors to Stanford from enjoying the continuation of the Wandelpad. Therefore it will be for the sole use of the residents of the estate, which was not the original intention. Some sort of access should be allowed.</p> <p>The proposed name for this development is Stanford Green Eco Lifestyle Estate. The green space in the centre of the village is known as The Stanford Green and it</p>		
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	<p>is a Heritage site. Therefore the naming of Erf 438 with a name so similar is completely unacceptable.</p> <p>To conclude: I see too many disadvantages, not advantages, of having such a development on an Erf that has such environmental significance. Once developed it can never return to its original state, which DOES enhance the rural feel of a small country village. I fear that the plan will not end up as is proposed. The developer appears that he has little respect for the ideals of Stanford.</p> <p>Regards</p> <p>Liz Macmillan</p>		
<p>Barbara Martin</p>	<p>Email dated 25/04/2025</p> <p>To Whom it may concern:</p> <p>My objections to, and questions about, the above development are as follows:</p> <ul style="list-style-type: none"> • The name of this development - I have a strong objection to the name 'Stanford Green' considering that we already have a well known Stanford Green in the middle of the village. This name is registered. • Considering that this is an Eco village, what will be done to mitigate the damage that cats will do to the ecosystem? • Will the vegetation and plantings in gardens be restricted to locally indigenous plantings, if this is an eco village? • Who will be having oversight over adherence to the Stanford rules and the promises made? • I object to the height of the buildings of 7.1m, as this will result in rows of 'salt cellar-like' dwellings. • This development would be at the entrance to Stanford, and it is important that it has the Stanford look and feel. • I am concerned at the height of the buildings in relation to the tiny spaces at the front of each property, with the houses looming in a way that is completely out of proportion. • I object to the tall, narrow window sizes and shapes that are not part of the Stanford ethos. • Stanford residents have long been promised access to the whole of the Millstream, with the extension of the Wandelpad, which will happen in due time, 	<p>The comment was submitted in response to the Landuse Planning Application and not the Environmental Authorisation application.</p>	

	<p>as part of the Millstream Master Plan - if this development has private access to the Millstream area, this will be contrary to that plan. I would like to have access, as a Stanford resident, to that area once it has been refurbished, as laid out in the Master Plan. A suggestion would be for the Municipality to establish a servitude on about 5m of land on either side of the Millstream, which would ensure that the existing residents of Stanford have access to that area.</p> <ul style="list-style-type: none"> • Has a Water Use Licence been issued for the use of water from the aquifer? • I return to oversight of the project - I am concerned that 'permission might be given' or a labourer might take it onto himself to do things like the cutting down, of Milkwoods, indigenous trees that are protected and may not be cut - who will have oversight over the promises made, and the actual outcome? What oversight will be had over contractors doing things like emptying paint or toxic chemicals into the waterway(s)? • All street facing buildings should be in keeping with the general Stanford 'look', especially as this development falls within the Heritage Overlay area. • Roof pitch MUST be very strictly controlled, in order to ensure that the dwellings remain in proportion. • In the Background section of the document, mention is made of the peaceful and quiet nature of our village - I am of the opinion that this development will negatively affect that, in order that someone can make money by developing the land. We do not need more and more people coming to Stanford to change the dynamic of the village that we all love, and moved here for, and wish to preserve. <p>Your sincerely Barbara Martin Stanford resident</p>		
Chris Wolf	<p>Email dated 25/04/2025</p> <p>Dear Michelle</p> <p>I am forwarding the email drafted by Katie Smuts which I fully support and saw no reason to try and -improve on it. I could not have said it better</p> <p>Kind Regards Chris Wolf 8 Vlei Str Stanford</p>	<p>The comment was submitted in response to the Landuse Planning Application and not the Environmental Authorisation application.</p>	

	<p>083 455 3605 chris@ips.co.za</p> <p>As a resident of Stanford, I would like to lodge the following comments in respect of the proposed rezoning, consolidation, subdivision and departures applied for for Erf 438.</p> <ol style="list-style-type: none"> 1. The proposed development cannot be called Stanford Green. The Village already has a Green, a graded, protected heritage resource that is central to the identity of Stanford. 2. The height departure is not supported. The development falls within the HPOZ and should, as it states it does, conform to the Stanford Style guidelines. This allows for a maximum ridge height of 6.8m above base level. This height allows for full use of a loft space, and, further, conforms to the recommendations of the Heritage Impact Assessment. 3. The wall plate height departure can be supported provided that roof slopes conform to the stipulated range for structures within the HPOZ, i.e. minimum 30 degrees, maximum 45 degrees. 4. Finishes of structures should conform to Stanford Style guidelines, i.e. no cladding, no face brick, no bagged brick. 5. Fenestration should conform to the typical solid/void ratio as stipulated in Stanford Style; long narrow windows should not be permitted. 6. Boundary walls should conform to the stipulations of Stanford Style, i.e. 1.8m to the street building line, and 1.2m beyond that. 7. Fencing off the Mill Stream where it runs through the property cannot be approved, unless free public access through that area is provided - without the need utilise the development's facilities. The Mill Stream Master Plan has been endorsed, and partly funded, by the Municipality, and foresees this area as a Nature Reserve, with the extension of the Wandelpad through this area to the Eye. Fencing this off from public access will forever prevent this outcome from being realised. 8. The Municipality should create a servitude over the Mill Stream where it passes through the erf, partly to ensure continued public access, and partly to allow for municipal inspection of the condition and integrity of this public resource where it flows through private land. This will ensure that at no illegal extraction, or other forms of flow tampering, is occurring, as this would have direct negative impacts on the integrity of the vlei, and negate the gains of the Mill Stream project to date. Such a servitude could be determined by contours, and feasibly be applied to the area below the 15m contour. 		
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	<p>As I said, I also think that, given the limited room for growth in this village - circumscribed as we are by the river and the chicken farm, that thought should be given to allowing the 'coloured community' who already lost out under Group Areas to have a future in Stanford through the provision of space for expansion of affordable lower-middle income housing...although, of course, none of us wants high density growth at the intersection...but there must be some middle ground. Maybe I'm being too idealistic...</p>		
<p>Liz Macmillam</p>	<p>Email dated 29/04/2025</p> <p>As a resident of Stanford I wish to object to the above development for several reasons.</p> <p>As stated in the proposal submitted by the developer of ERF 438, Stanford is described as follows: “ Stanford is a flourishing farming community with the Klein River meandering through lush fields and village homes built along its banks. The rural atmosphere of the old village with its many historical features has been retained and preserved. Stanford has a peaceful and quiet charm that has drawn many people from the city in search of the quality of life a small village and the surrounding area offers. Many of the old homes have been renovated and restored and countless new homes have been built in Stanford in the last decade.”</p> <p>I do not believe the proposed development enhances the peaceful, quiet charm and quality of life of a small village in any way. To enter the estate will require one to go through an entrance gate appropriate for a town house development in a town or city, not a style in accordance with a historical village AND located on a road designated a scenic route.</p> <p>The municipality itself describes this area as having a unique eco system encompassing the Millstream and Milkwood forests. If this area is indeed unique then it should be left untouched not developed and disturbed by a housing estate. The developer wishes to build what is described as “Pods” in amongst the Milkwoods, but these structures are shown in the design drawings as glass and steel squares which in no way blend into or enhance a forest setting. They are not, as is stated, going to blend seamlessly with the historical and aesthetic context of the town.</p> <p>The Millstream leading from Die Oog is undeniably unique and this eco system, home to the endangered Leopard Toad, is inevitably going to be polluted by the ongoing construction with run off from cement, sand, paint and other building</p>	<p>The comment was submitted in response to the Landuse Planning Application and not the Environmental Authorisation application.</p>	

	<p>materials. Once the homes are built and open areas and gardens are being developed the fertilisers and chemicals are bound to be washed into the stream to its detriment. It has already been established that the fertilisers used in farming have increased the growth of the invasive reed all along the Klein River and the Millstream is already compromised by reed invasion.</p> <p>With the already increased water usage due to housing development over the last few years, I wonder how much another new development will impact the water supply in Stanford. With so much water being needed for domestic use already will the Mill Stream receive enough to keep it flowing and flourishing? I understand that the Leiwater system in the village relies heavily on excess water from Die Oog. According to some of those villagers who use the Leiwater for the irrigation of their gardens, this system is no longer reliable, due to the fact that already there is not enough excess water available.</p> <p>The Millstream Rehabilitation project is expected to start sometime soon and the Village residents were led to believe that the existing Wandelpad was to follow the path of the Millstream up to Die Oog. With the development of Erf 438 the security fencing enclosing it will restrict the residents and visitors to Stanford from enjoying the continuation of the Wandelpad. Therefore it will be for the sole use of the residents of the estate, which was not the original intention. Some sort of access should be allowed.</p> <p>The proposed name for this development is Stanford Green Eco Lifestyle Estate. The green space in the centre of the village is known as The Stanford Green and it is a Heritage site. Therefore the naming of Erf 438 with a name so similar is completely unacceptable.</p> <p>To conclude: I see too many disadvantages, not advantages, of having such a development on an Erf that has such environmental significance. Once developed it can never return to its original state, which DOES enhance the rural feel of a small country village. I fear that the plan will not end up as is proposed. The developer appears that he has little respect for the ideals of Stanford.</p> <p>Regards Liz Macmillan</p>		
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7.1. Responses to comments on Municipal Landuse Planning Application



Our Reference: 23/91
Your Reference: 4738/2024 & 438 STAN

13 May 2025

The Municipal Manager
Overstrand Municipality
P O Box 20
HERMANUS
7200

Sir

ERF 438 STANFORD: ERF 438, STANFORD: APPLICATION FOR REZONING, SUBDIVISION, CONSENT USE, DEPARTURE AND ALLOCATION OF STREET NAMES.

Several letters of objection and comments were received that will be addressed within this response.

Project Planning | Project Feasibility | Land Use Applications | Project Execution Management | Liquor Licensing

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HERITAGE, STANFORD STYLE AND HPOZ

The concerns raised regarding the Heritage Protection Overlay Zone (HPOZ), Stanford's architectural identity, and broader heritage considerations are noted and appreciated. The development team acknowledges the importance of Stanford's heritage status and the responsibilities that come with working within an HPOZ. This application has carefully taken these considerations into account throughout the design and planning process.

It is important to clarify that although a portion of Erf 438 Stanford falls within the boundaries of the Stanford HPOZ, the heritage-related planning parameters have been fully considered in shaping the proposal. The development has been guided by the purpose of the HPOZ as outlined in the Overstrand Municipality Land Use Scheme (2020), specifically the aims set out in section 14.2 in the motivational report. These include protecting and enhancing the visual relationship between the village, the Klein River, and the natural spring, "Die Oog." The proposed layout respects this objective by preserving significant environmental features such as the wetland and milkwood groves and by maintaining generous open space areas that support visual continuity with the surrounding landscape.

The architectural approach for all street-facing and prominent structures has been informed by the "Stanford style" as described in municipal guidelines and heritage references. The Stanford Style allows modern interpretations which includes the use of appropriate forms, materials, and proportions that align with the established aesthetic character of the village. While a consent use and departures have been applied for, they do not undermine the core heritage objectives but rather support flexibility to allow for context-sensitive design that remains visually compatible with its setting.

Additionally, the design process included input from a professional team including a landscape architect, heritage practitioners, and an environmental consultant, all of whom have contributed to ensuring that the development is contextually appropriate. The layout does not attempt to mimic historical structures inauthentically but rather aims to provide a modern interpretation that pays respect to Stanford's unique cultural and architectural character. This approach aligns with heritage best practices and ensures that the development enhances, rather than detracts from, the sense of place.

The proposal recognises the village's heritage value, acknowledged by Heritage Western Cape as one of the best-preserved villages in the province, and responds with a development model that is environmentally sensitive, architecturally appropriate, and spatially respectful. The applicant welcomes continued engagement with the municipality to ensure that the architectural controls and conditions tied to the HPOZ are effectively implemented during the building plan approval stage.

DEVELOPMENT PARAMETERS AND COMPLIANCE WITH THE STANFORD STYLE

The comments regarding building height, architectural elements, boundary controls, and compliance with the Stanford Heritage Protection Overlay Zone (HPOZ) and associated Stanford Style guidelines are noted and appreciated. These matters have been considered carefully by the applicant and form a critical part of the design approach for the development.

It is important to note that while a departure in building height has been applied for, it is modest in scale and has been carefully motivated. The proposed ridge height of 7.1m exceeds the standard 6.8m allowance by only 0.3m and is not intended to significantly alter the massing or character of the buildings. This slight increase allows for more functional internal volumes and

loft spaces while maintaining external proportions consistent with local architectural norms. Importantly, the application confirms that all roof pitches will comply with the stipulated 30-to-45-degree range in accordance with the Stanford Style and HPOZ guidelines.

Regarding concerns about boundary line departures and potential overdevelopment of erven, it is reiterated that the development's layout was prepared in consultation with professional architects and heritage specialists. The intent is not to maximise density at the expense of character but rather to allow flexibility in positioning of dwellings to improve environmental performance (e.g., solar orientation), preserve mature trees, and provide spatial relief within the layout. The proposed lateral and street building line departures are minor and context-sensitive and will not result in a cramped or overdeveloped appearance. Moreover, such departures are being considered as part of a holistic development package with specific architectural guidelines and landscape controls, not as stand-alone leniencies.

With respect to fenestration, finishes, and wall treatments, the applicant fully supports the principles outlined in the Stanford Style guide. All dwellings will be required to comply with a detailed architectural code to be enforced through the Homeowners Association (HOA) constitution. This includes the use of traditional window-to-wall ratios, appropriately proportioned openings, and a strict prohibition on inappropriate materials such as face brick, cladding, or bagged finishes. Boundary wall heights and treatments will also be controlled to reflect the traditional rhythm and scale of Stanford's built form, consistent with HPOZ guidelines, these are already addressed in the design guidelines that was included in the application.

The suggestion that this application may set an undesirable precedent is understood, but the intention is not to dilute heritage standards but to respond to the unique characteristics of Erf 438 Stanford in a respectful and contextually sensitive manner. This development, unlike isolated site-specific applications, is structured within a comprehensive design and governance framework. The proposal does not intend to exploit flexibility, but rather to deliver a cohesive and high-quality residential environment that complements and strengthens the Stanford character.

In summary, while the application does include minor departures from the development parameters, these are carefully justified, limited in scope, and supported by robust design principles that reinforce, rather than weaken, the values of the HPOZ. The applicant remains committed to working with the Overstrand Municipality and local stakeholders to ensure that the final built outcome is one that preserves Stanford's unique identity while allowing for sensitive, sustainable growth.

ENVIRONMENTAL CONSIDERATIONS AND WATER RESOURCE PROTECTION

The environmental value of the Millstream, the wetland, and the broader ecological setting of Erf 438 is fully acknowledged by the applicant. This development has been guided by the fundamental principle of working with nature, not against it. Environmental sensitivity is at the core of the design and layout, and substantial steps have already been taken to ensure protection, enhancement, and long-term sustainability of the natural systems on the site.

Regarding the Millstream and wetland, it is important to note that a Basic Assessment Report (BAR) process is currently underway, led by Lornay Environmental Consulting (Pty) Ltd, in terms of the National Environmental Management Act (NEMA). This process includes a comprehensive assessment of ecological impacts, with specialist inputs such as an Aquatic Biodiversity Impact Assessment (refer to Annexure K of the motivational report). All findings and the final Record of Decision (ROD) will be submitted to the Overstrand Municipality once obtained. In the interim, the development layout already includes a buffer of 32 metres from

the wetland, adhering to the minimum requirements for watercourse protection, and no built structures are proposed within this zone.

With respect to monitoring, servitudes, and access, it is noted that the Stanford Conservation Trust (SCT) has proposed the establishment of a servitude along the Millstream to expand the wandelpad. Erf 438 Stanford is privately owned, and the registration of public servitudes over private land is not considered appropriate in this context. The southern bank of the Millstream, however, located on Erf 294, Stanford, is owned by the municipality and zoned as Public Open Space. This area would be ideally suited to allow public access to the Millstream, as envisaged in the Millstream Master Plan. The applicant is willing to contribute to the funding of possible raised boardwalks and upgrades to the trail on Erf 294 Stanford.

Furthermore, the applicant is currently working in collaboratively with the municipality and community stakeholders (Stanford Conservation, Ratepayers and Stanford heritage) to explore practical and legally appropriate mechanisms to align the development with the broader objectives of the Millstream Master Plan.

Protection of **Milkwoods** and indigenous vegetation is a non-negotiable priority in this development. No milkwood trees are proposed to be removed. On the contrary, they form an integral part of the conservation-led design. Construction activities will be tightly controlled through an Environmental Management Programme (EMP), which will outline restrictions on the movement of contractors, materials, and equipment to avoid unnecessary disturbance. Furthermore, the project will appoint an Environmental Control Officer (ECO) to monitor compliance throughout the construction period and ensure accountability for any damage caused.

Concerns about **runoff** and pollution during and after construction are valid and are already addressed through best-practice environmental planning. The development includes sustainable urban drainage systems (SUDS), such as vegetated swales and detention ponds, which will naturally filter runoff before it enters the Millstream. Additionally, the use of fertilisers and non-indigenous plantings in landscaping will be strictly limited, only organic fertiliser will be allowed. Landscaping will rely on existing and locally appropriate endemic species only. These measures, together with the oversight of the ECO, will minimise risks to the endangered Western Leopard Toad and other sensitive species.

Regarding the **water pressure and supply** concerns, it is important to clarify that no direct extraction of water from "Die Oog" or the Millstream is proposed, nor will any be permitted under the current application. Water supply to the development will be provided by the Overstrand Municipality's bulk infrastructure, and final engineering designs will be subject to municipal approval. A detailed civil engineering report, already prepared as part of the application, outlines the anticipated demand and confirms the capacity of the municipal system to service the proposed development without detriment to surrounding areas. Any upgrades required will be undertaken at the applicant's cost, as standard practice.

As for the **removal of blue-gum trees**, while their contribution to bee foraging is noted, Blue Gums are a listed invasive alien species under the National Environmental Management: Biodiversity Act. Their removal is not only permitted but encouraged under South African legislation due to their high-water consumption and competition with endemic species. The development will mitigate this impact through the planting of endemic wetland flora and trees that support local pollinator species, ensuring that habitat value for bees is preserved and enhanced. The blue gums will also be repurposed in creating boardwalks around the development ensuring the wood will be repurposed.

The concern regarding the potential ecological impact of domestic cats is acknowledged. The applicant recognises the risks that domestic cats pose to sensitive fauna, particularly birdlife, amphibians such as the endangered Western Leopard Toad, and small reptiles. While it is not possible to ban domestic pets entirely, the development's environmental management guidelines will include specific recommendations and restrictions related to pet ownership. The proposal would be to ensure all cats are locked inside the houses during the evenings. Other proposal may include the encouragement of responsible pet ownership practices, designated indoor or enclosed outdoor spaces for pets, and awareness campaigns for residents regarding the risks to local biodiversity. These measures aim to strike a balance between residential lifestyle preferences and the protection of local ecosystems.

Lastly, the applicant fully supports the use of sustainable landscaping practices that are environmentally appropriate and low impact. The development will require the use of locally endemic vegetation, specifically species that are indigenous to the Stanford area and naturally occur within this ecosystem. This approach not only reinforces local biodiversity but also reduces the need for irrigation and chemical inputs such as fertilisers and pesticides, thereby protecting the adjacent wetland and broader Millstream ecosystem.

To ensure ecological accuracy and integrity in the landscaping plan, the applicant is amenable to engaging a qualified local botanist or ecologist with expertise in endemic vegetation specific to the region. Their role will include guiding the selection, sourcing, and placement of plant species throughout the development and ensuring that all landscaping aligns with ecological best practices. Landscaping guidelines will be incorporated into the homeowners' association constitution to ensure ongoing compliance by future residents.

DEVELOPMENT NAME

The concerns raised by various objectors regarding the use of the name "Stanford Green – Eco Lifestyle Estate" are noted and appreciated. The applicant acknowledges the long-standing historical and cultural significance of The Stanford Green, which forms an integral part of the heritage and identity of the village. It is not the intention of the developers to detract from, misrepresent, or create confusion with this established landmark.

The name "Stanford Green" was initially selected to reflect the development's alignment with sustainable living, ecological design, and its proximity to the natural landscape that characterises the broader Stanford environment. The inclusion of "Green" was meant to convey the eco-conscious ethos of the project, rather than to appropriate or compete with the heritage village green. However, it is clear from the public comments that this choice may be interpreted as insensitive or misleading in the local context.

The applicant wishes to make it clear that the naming of the development is not final, and there is no legal or branding reason that would prevent a name change. As such, in light of the strong sentiment expressed by members of the community and stakeholders, the applicant is open to proposing an alternative name of - engaging further with the municipality and local residents to identify an alternative name

STANFORD OR MILLSTREAM – ECO LIFESTYLE ESTATE

that also reflects the identity and values of the development without causing confusion or compromising the integrity of the village's heritage.

It was not the intention of the development to undermine any existing cultural or historical references. In fact, this application and accompanying design have been structured around

enhancing Stanford's existing character, not detracting from it. The name, while important, is not fundamental to the principles or success of the development and can be changed to ensure alignment with community expectations and local heritage sensitivities.

SERVICES

The concerns raised regarding the availability and management of water, the protection of sensitive watercourses like the Millstream and Die Oog, and the capacity of existing infrastructure (particularly sewerage) are fully acknowledged. These matters are critical to ensuring sustainable development and was addressed above. Further clarification and expansion are provided below.

As previously stated, no direct extraction of water from Die Oog or the Millstream is proposed as part of this development. The development will not use groundwater or surface water from these sources. The applicant is not applying for, nor would be eligible for, a Water Use Licence under the National Water Act for this purpose. Water will be supplied by the Overstrand Municipality's bulk water supply network, and the developer has engaged with municipal engineers and GLS consulting engineers to confirm that the current system can meet the projected demand without compromising supply to existing areas. A comprehensive civil engineering services report and capacity availability report was submitted as part of the land use application, confirming capacity and indicating where minor upgrades may be required. As per municipal practice, any necessary upgrades to infrastructure that arise from the development will be entirely at the developer's cost.

With regard to the Millstream, wetland, and associated ecological systems, the development includes a 32-metre ecological buffer around the wetland. The preservation of this buffer zone, along with restrictions on development within its boundaries, is specifically intended to protect water quality and sensitive aquatic habitats, including those that support the endangered Western Leopard Toad. Furthermore, as part of the NEMA Basic Assessment Report (BAR) currently underway, the applicant has appointed a team of environmental specialists, including a freshwater ecologist, to assess all potential impacts on surface and groundwater systems. Their findings will inform an Environmental Management Program (EMP), which will include construction-phase controls, long-term mitigation measures, and ongoing monitoring requirements for the wetland and Millstream system.

The applicant is willing to adhere to the EMP which will ensure responsible water usage, prevent contamination from landscaping or construction activities, and support the long-term health of the Millstream system. The development will also adopt a low-impact landscaping strategy, relying exclusively on locally endemic plant species that are drought-resistant and require no irrigation beyond natural rainfall. The use of standard fertilisers will be discouraged and enforced by the Homeowners' Association in terms of the constitution, and landscaping will be done under the guidance of a qualified local botanist. Only organic fertilizer will be allowed.

With regard to sewerage infrastructure, the proposed development will be connected to the municipal wastewater system as was detailed within the motivational report. Engineering (GLS Consulting) input has confirmed that the network can accommodate the additional load through minor upgrades, and the developer is committed to funding any necessary works through the bulk infrastructure contribution levies. The addition of this development is not expected to contribute significantly to such failures of the existing wastewater system, provided the planned capacity upgrades are completed as required by the municipality.

The channels proposed next to the roads are to mimic the historic leiwater system but will only be used as part of the stormwater system. The development will not be linked to the existing leiwater system of Stanford.

The proposed development has been planned with full awareness of Stanford's sensitive water infrastructure and environmental context. The development will not extract water from protected sources, will rely on the municipal supply network, and includes robust measures to protect and monitor watercourses. The applicant remains open to working with municipal and environmental authorities to further refine water management commitments, ensuring that the development does not undermine, but instead contributes to, the long-term sustainability of Stanford's natural and infrastructural systems.

TRAFFIC

The concern regarding traffic congestion at the entrance to Stanford, particularly during peak periods and tourist seasons, is noted. The potential impact of the proposed development on local traffic conditions has been carefully considered as part of the planning process.

To address this, a Traffic Impact Statement (TIS) was prepared by qualified traffic engineers (UDS Africa), based on the scale and nature of the proposed development. The findings confirm that the anticipated vehicle movements generated by the 31 residential units and associated tourist accommodation will be relatively low and will not significantly impact on the capacity or functioning of the surrounding road network, including the entrance to the village from the R43.

Importantly, the development includes a single controlled access point off the R43, which has been positioned and designed to ensure safe access and egress, with sufficient stacking distance to prevent any obstruction to through traffic. While it is acknowledged that Stanford experiences traffic pressure during peak visitor times, the permanent residential nature of most of the proposed units means that trip generation will be more consistent and moderate, rather than spiking during holiday periods. The additional traffic from this development is therefore not expected to materially worsen existing congestion levels.

VILLAGE CHARACTER, SOCIAL IMPACT, AND COMMUNITY BENEFIT

The peaceful, rural atmosphere of Stanford is a cornerstone of its appeal, and the proposed development has been purposefully scaled and designed to reinforce, rather than erode, this character. With only 31 residential erven proposed over a 5.1-hectare property, the development reflects a low-density, environmentally sensitive layout. Building forms, materials, and finishes will be strictly governed by a binding architectural code aligned with the Stanford Style Guide and enforced by the Homeowners' Association in coordination with municipal conditions of approval.

The proposal includes generous open spaces, wide ecological buffers, and considered placement of structures to maintain a sense of openness and natural integration. Importantly, the entrance to the estate has been designed to remain understated and rural in appearance, supported by a planted berm and indigenous tree and wetland flora planting to soften its visual impact along the R43 scenic corridor.

Concerns that the development will shift Stanford's character into that of a typical suburban enclave are respectfully disputed. Rather than intensifying land use, the proposal uses spatial restraint, ecological rehabilitation, and design harmony to preserve Stanford's distinct

character. The scale of the development is such that it will not generate significant pressure on services, traffic volumes, or urban form. The architectural typologies avoid visual clutter or vertical dominance, with limited height departures and roof pitch controls that conform to the HPOZ guidelines.

The proposed 16-room milkwood tourist lodge is an intentionally small and low-impact addition, located in an area of the site unsuitable for standard residential development due to the density of protected milkwoods. The lodge structures will be lightly constructed, with pods scattered beneath the canopy, and will not be visible from the R43 or the core village area. The financial viability and operation of the lodge rest entirely with the private developers and are undertaken at their own risk. The tourism component is aimed at enhancing Stanford's eco-tourism offering, not replicating existing hospitality products, and would support longer guest stays and associated local economic multipliers across existing restaurants, shops, and guides. Refer to the motivational report for a more detailed explanation.

While objections include the urgent need for affordable or gap-market housing, it must be emphasised that the provision of the gap-market housing challenge in South Africa rests on a collaborative effort between National and Local government, the private sector, and financial institutions.

Erf 438 Stanford is privately owned and is not earmarked for state-assisted housing delivery. It is also topographically and environmentally unsuitable for high-density development. The development will however contribute indirectly to the municipality's ability to deliver public housing by significantly increasing the property tax base, generating an estimated R1.2 million per annum in rates, and funding essential service upgrades at no cost to the municipality or existing residents.

Employment and service delivery benefits are real and measurable. Approximately 40 temporary construction jobs and 25 permanent positions are anticipated during and after development, with an emphasis on local recruitment. Indigenous landscaping, wetland protection, removal of invasive species, and potential support for raised boardwalks along Erf 294 Stanford municipal open space all contribute to the enhancement of the public realm and the Millstream Master Plan objectives.

In summary, the development does not seek to impose an urban model on Stanford but instead offers a thoughtful and proportionate intervention that works with the environmental and heritage character of the village. It responds to growth within the designated urban edge, avoids exploitation of natural resources, and offers long-term environmental stewardship and social benefits. With concerns addressed in detail and tangible commitments made, the application is respectfully submitted for approval.

INTERPRETATION OF FUTURE HOUSING NEEDS IN THE OMSDF

The objection relating to the interpretation of housing demand figures in the Overstrand Municipality Spatial Development Framework (OMSDF) is acknowledged and appreciated. The concern focuses on the claim that the figures quoted in the motivation may lead to an incorrect conclusion about the broader housing need beyond that of indigent or low-income households.

It is agreed that Table 2.10 on page 28 of the OMSDF outlines housing needs based on indigent population data, and that the projected 1,088 additional dwelling units by 2031 includes both indigent and non-indigent housing demand. It is however important to clarify that the purpose of referencing this data in the application was not to claim that the entire projected housing

demand justifies this development in isolation, but rather to highlight the overall trajectory of growth anticipated for Stanford over the next decade.

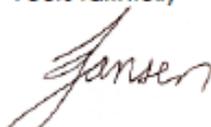
The development on Erf 438 Stanford is not proposed as part of the indigent housing response but rather as a contribution toward meeting the broader need for housing diversity, which includes formal, privately funded housing. The OMSDF recognises that Stanford is experiencing incremental population growth, and that housing delivery needs to respond to a range of market segments, not just subsidised or RDP units. The 135 non-indigent dwelling units inferred from the objector's reading of the document still represent a material number of units that must be planned for in a spatially sustainable and environmentally appropriate manner.

The proposal for 31 residential units therefore, represents a reasonable and proportionate contribution to this non-indigent housing need and is aligned with the OMSDF's stated objective of accommodating future growth within the current- and revised urban edge. It is not the intention or conclusion of the application that the full 1,088 units are all to be delivered through private development, but rather that strategic, well-located sites such as Erf 438 Stanford can play a complementary role in delivering housing within the broader settlement framework.

In addition, it should be noted that the OMSDF does not restrict housing delivery solely to indigent demand but encourages spatial planning that enables a balanced and integrated settlement pattern, which includes market-related housing to promote socio-economic diversity. In this context, the development contributes positively to Stanford's future growth trajectory in a responsible, well-planned, and environmentally sensitive manner.

In conclusion, the objections received have been duly considered and comprehensively addressed. The proposed development has been conceived with due regard for the environmental sensitivities, heritage context, and the established character of the area. It complies with the applicable spatial planning policies, falls within the urban edge, and does not undermine any planning principle or enforceable restriction not specifically addressed by the application. The proposal represents an appropriate and sustainable form of development and does not negatively impact the rights or amenities of surrounding property owners. It is therefore respectfully submitted that the application be approved as proposed.

Yours faithfully



T. JANSEN
PROFESSIONAL TOWN PLANNER (A/2858/2019)

8. COMMENTS RECEIVED DURING DRAFT / PRE-APPLICATION PUBLIC PARTICIPATION



Cor Van Der Walt
LandUse Management
Email: Cor.VanderWalt@westerncape.gov.za
tel: +27 21 808 5099 fax: +27 21 808 5092

OUR REFERENCE : 20/9/2/4/2/968
YOUR REFERENCE : 438SF
DEA&DP REFERENCE : 16/3/3/6/7/1/E2/37/1035/24
ENQUIRIES : Cor van der Walt

Lornay Environmental Consulting
Email: michelle@lornay.co.za

Att: Michelle Naylor

BASIC ASSESSMENT PROCESS
PROPOSED RESIDENTIAL DEVELOPMENT: DIVISION CALEDON
ERF NO 438, STANDFORD

Your application of 04 September 2024 has reference.

From an agricultural perspective the Western Cape Department of Agriculture has no objection.

Please be advised, that this office is a commenting authority and further discussions on your application must be taken up with the decision makers. Further consultation will only be considered when requested by the decision maker.

Please note:

- Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.

- The Department reserves the right to revise initial comments and request further information based on the information received.

Yours sincerely


Mr. CJ van der Walt
LANDUSE MANAGER: LANDUSE MANAGEMENT
2024-10-29

Copies:

Overstrand Municipality
PO Box 20
HERMANUS
7200

Department of Environmental Affairs & Development Planning
1 Dorp Street
Cape Town
8000



25 September 2024

Lornay Environmental Consulting

Attention: Michelle Naylor

By email: michelle@lornay.co.za

Dear Michelle,

RE: ERF 438 – BASIC ENVIRONMENTAL ASSESSMENT – REGISTRATION AS AN IAP

Further to your notice of public participation process for the basic environmental assessment process to be undertaken on Erf 438, Stanford, for the proposed development, this letter serves as confirmation that Stanford Heritage Committee (SHC), a Committee of the Stanford Conservation Trust, would like to be registered as an IAP and kept up to date with the progress and developments/outcomes of the basic environmental assessment process.

Yours sincerely,



James Aling
Chair

cc. Mike Munnik Secretariat

Stanford Heritage
P O Box 539 Stanford 7210 | stanfordheritage@gmail.com
www.stanfordconservation.org



Department of Infrastructure
Vanessa Stoffels
Chief Directorate: Road Planning
Vanessa.Stoffels@westerncape.gov.za | Tel: 021 483 4669

Ref: DOI/CFS/RN/LU/REZ/SUB-21/295 (Application: 2024-09-0025)

Lornay Environmental Consulting
P O Box 1990
HERMANUS
7200

Attention: Ms M Naylor

Dear Madam

PROPOSED RESIDENTIAL DEVELOPMENT, ERF 438, STANFORD: COMMENTS ON DRAFT BASIC ASSESSMENT REPORT

1. Letter 438SF to this Branch dated 04 September 2024 refers.
2. The subject property is in Stanford and takes access off Trunk Road 28 Section 2.
3. This Branch offers no objection to the issuing of Environmental Authorisation in terms of the National Environmental Management Act 107 of 1998.
4. This Branch will comment on the access upon receipt of the Land Use application.

Yours Sincerely

SW CARSTENS

For DEPUTY DIRECTOR-GENERAL: TRANSPORT INFRASTRUCTURE BRANCH

DATE: 3 OCTOBER 2024

DOI/CFS/RN/LU/REZ/SUB-21/295 (Application: 2024-09-0025)

ENDORSEMENTS

1. Lornay Environmental Consulting
Attention: M Naylor (e-mail: michelle@lornay.co.za)
2. District Roads Engineer
Paarl
3. Ms PZ Govu (e-mail)
4. Mr S Carstens (e-mail)

OVERBERG DISTRIKSMUNISIPALITEIT DISTRICT MUNICIPALITY UMASIPALA WESITHILI



MELD ASB/PLEASE QUOTE

Ons Verw./Our Ref.: 18/5/5/4

Navrae/Enquiries: Francois Kotze

Bylyn/Ext.:

Privaatsak: X22

Private Bag:
BREDASDORP
7280

Tel.: (028) 4251157

Faks/Fax: (028) 4251014

E-mail/E-pos: rvolschenk@odm.org.za

04 October 2024

LORNAY ENVIRONMENTAL CONSULTING

P.O. BOX 1990

HERMANUS

7200

For attention: Michelle Naylor

**RE: NOTICE OF PUBLIC PARTICIPATION FOR A BASIC ASSESSMENT PROCESS:
PROPOSED RESIDENTIAL DEVELOPMENT, ERF 438 STANFORD, CALEDON RD**

Reference number: 16/3/3/6/7/1/E2/37/1035/24

The Overberg District Municipality's department of Environmental Management Services takes cognisance of the draft Basic Assessment Report.

With reference to the Western Cape Biodiversity Spatial Plan, 2017 (WCBSP) the development footprint is not categorise as a Critically Biodiversity Area (CBA) nor an Ecological Support Area (ESA). The current application falls within Agulhas Limestone Fynbos which is listed as Critically Endangered, but the site is mainly transformed due to historic agricultural use.

The proposed development is situated within the urban edge of the Stanford area and is zoned residential. The preferred layout which incorporates a buffer between the wetland and the development footprint as well as protect the indigenous milkwood trees is supported.

Alle korrespondensie moet aan die Munisipale Bestuurder gerig word.
All correspondence must be addressed to the Municipal Manager

The ODM therefore has no objection against the proposed development and support the mitigation proposals as stipulated in the specialist reports.

Yours faithfully,



R. BOSMAN
MUNICIPAL MANAGER



Department of Environmental Affairs and Development Planning
Ntanganedzeni Mabasa
Directorate: Development Management, Region 1
Ntanganedzeni.Mabasa@westerncape.gov.za | Tel: 021 483 2803

REFERENCE: 16/3/3/6/7/1/E2/37/1035/24

DATE: 7 October 2024

The Board of Directors
Omni King Investments (Pty) Ltd
24 Sillery Street
STANFORD
7210

Attention: Mr. Kevin King

Cell: 083 656 0606
Email: kevin@rex.co.za

Dear Sir

COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT ("BAR") IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT ("NEMA"), 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED RESIDENTIAL DEVELOPMENT ON ERF NO. 438, STANFORD.

1. The electronic copy of the draft BAR, as received by the Directorate: Development Management ("this Directorate") on 3 September 2024, and the Directorate's acknowledgement thereof issued on 12 September 2024, refer.
2. Following the review of the information submitted to this Directorate, the following is noted:
 - 2.1 The proposed development of 27 single residential erven, one general residential erf for town housing, private open spaces, and associated infrastructure on Erf No. 438, Stanford.
 - 2.2 Erf No. 27 will accommodate a lodge for tourist accommodation, while Erf No. 28 will accommodate a guesthouse (with 10 beds). The lodge accommodation will be 16 freestanding pods located between in the Milkwood trees.
 - 2.3 The proposed development footprint is approximately 5.2ha in extent.
 - 2.4 Three wetlands were identified within the proposed site, including the Mill Stream wetland (classified as a Unchanneled Valley Bottom Wetland ("UVBW"), a small tributary thereof (also a UVBW) and a hillslope seep wetland within the onsite farmed area. The proposed development will be located within 32m of the watercourses present on the site and the preferred layout was designed to ensure that the Mill Stream and associated wetlands are incorporated into the development as a rehabilitated and functional green open space. 10 of the proposed erven along the wetland side, will include an Undevelopable Area which may not be developed. The aim of this "no development zone" is to prevent development and landscaping from extending into the 32m wetland buffer zone.
 - 2.5 Access to the complex will be through an entrance gate building, set back from the R43, in order to reduce the visual impact of a gated estate and permit traffic stacking.
 - 2.6 The site is mapped to contain Agulhas Limestone Fynbos and Elim Ferricrete Fynbos vegetation, which are classified as critically endangered and endangered vegetation types respectively. However, the site contains an area with cultivated buffalo grass that is sold commercially as roll on lawn on northern portion; a Milkwood grove together with wild olive and large exotic species in the



centre near the homestead; a patch of low indigenous shrubs and small trees typical of moist sandy soils in the southern portions; and a wooded portion of Blue Gums between the access road and the stream.

2.7 The site is zoned Single Residential Zone and is located inside the municipal urban edge abut outside the urban area of Stanford.

3. This Directorate's comments are as follows:

3.1 The recommended freshwater specialist mitigation includes "the implementation of a suitable a Wetland Offset, Rehabilitation and Management Plan". Clarity is required with respect to what the wetland offset aspect entails. The Breede Olifants Catchment Management Agency ("BOCMA") and CapeNature must confirm that the proposed maintenance and management of the onsite wetlands and buffer in perpetuity qualifies as a suitable offset for the loss of the hillslope seep wetland. This must be addressed and finalised as part of the basic assessment process and before submission of the final report for decision-making.

3.2 Given the location of the development, its designation as an Urban Conservation area in the Overstrand Municipality, Environmental Management Overlay Zone ("EMOZ") Regulations 2020, and considering that a portion of the site currently being used for agriculture, comments on the suitability of the proposed development must be obtained from the Overstrand Municipality, this Department's Directorate: Development Management (Region 2), and the Department of Agriculture.

3.3 A final comment must be obtained from Heritage Western Cape to confirm that the identified heritage impacts have been adequately addressed.

3.4 The Maintenance Management Plan ("MMP") that was included and submitted to this Department, does not meet the requirements of a MMP for adoption to enable future implementation of such maintenance related activities. The MMP is a legislative tool enabling the applicant to undertake certain permissible activities pertaining to maintenance related work only. It is imperative that the MMP is sufficiently detailed and, as a minimum, outlines the individually proposed future maintenance related activities, how, where and when these will be implemented, how the potential impacts associated with these actions will be prevented or minimised and the party responsible for such implementation. However, the method statements that have been included is limited and vague and lacks the necessary detail with respect to a step-by-step plan in a sequential and logical manner to inform the responsible person(s) on the process and actions to undertake when performing each identified maintenance activity, which aims to reduce the impact of undertaking the maintenance related work. The method statements in the MMP must therefore be updated and amended accordingly.

3.5 Proof of submission of the application to the BOCMA and a copy of the WULA Information must be included in the BAR.

3.6 Comment from, but not limited to the following Organs of State must be obtained

- 3.6.1 CapeNature
- 3.6.2 Heritage Western Cape
- 3.6.3 BOCMA
- 3.6.4 Department of Agriculture
- 3.6.5 Overstrand Municipality
- 3.6.6 DEA&DP Directorate: Development Management (Region 2)
- 3.6.7 The relevant road authority/ies

- 3.7 A comprehensive Comments and Response Report that includes all the comments received and the responses thereto must be included in the BAR. In addition, please ensure that copies of all the comments received are attached to the BAR.
 - 3.8 Proof of compliance with all the public participation steps undertaken, as required in terms of Regulation 41 of the NEMA EIA Regulations, 2014 (as amended) must be included in the BAR.
 - 3.9 In terms of Regulation 34 of the NEMA EIA Regulations, 2014, the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation, the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person (other than the Environmental Assessment Practitioner and Environmental Control Officer) and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014. Please advise what the estimated duration of the construction phase will be. In addition, you are required to recommend and motivate the frequency at which the environmental audits must be conducted by an independent person. This will be included as a condition should Environmental Authorisation be granted and therefore the proponent must confirm that the recommended frequency is acceptable.
 - 3.10 Please be advised that an original or electronically signed and dated applicant declaration is required to be submitted with the BAR to this Directorate. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.
 - 3.11 In addition to the above, please ensure that original or electronically signed and dated EAP and specialist declarations are also submitted with the BAR for decision-making.
 - 3.12 Omission of any required information in terms of Appendices 1 and 4 of EIA Regulations, 2014 (as amended) with respect to the final submission of the BAR and EMPr, respectively to this Directorate, may result in the application for Environmental Authorisation being refused.
- 4 Kindly quote the abovementioned reference number in any future correspondence in respect of the application.
 - 5 Please note that the proposed development may not commence prior to an Environmental Authorisation being granted by the Competent Authority.

Yours faithfully

**Andrea
Thomas**

HEAD OF COMPONENT

**DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1)
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

CC: (1) Ms. Michelle Naylor (Lornay Environmental Consulting)
(2) Mr. Chester Arendse (Overstrand Municipality)

Email: michelle@lornay.co.za
Email: gbenvironmental@overstrand.gov.za

Digitally signed by Andrea
Thomas
Date: 2024.10.07 17:18:23
+02'00'



CONSERVATION INTELLIGENCE: SOUTH

postal 16 17th Avenue, Voëklip, Hermanus, 7200
physical 16 17th Avenue, Voëklip, Hermanus, 7200
website www.capenature.co.za
enquiries Rhett Smart
telephone 087 087 8017
email rsmart@capenature.co.za
reference LS14/2/6/1/7/2/438_residential_Stanford
date 7 October 2024

Lornay Environmental Consulting
P.O. Box 1990
Hermanus
7200

Attention: Michelle Naylor
By email: michelle@lornay.co.za

Dear Ms Naylor

Pre-Application Basic Assessment Report for the Proposed Residential Development on Erf 438, Stanford

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.

Desktop Information

The property contains Ecological Support Area 1 and 2 (ESA) along the western and southern boundaries as mapped in the Western Cape Biodiversity Spatial Plan, with the remainder mapped as No Natural. The ESA is associated with the Mill Stream along the western boundary and a tributary along the southern boundary, with a floodplain wetland associated with these watercourses mapped in the National Wetland Map. The vegetation mapped for the site is Agulhas Limestone Fynbos, listed as critically endangered.

The screening tool results indicate a very high sensitivity for terrestrial biodiversity and aquatic biodiversity, high sensitivity for animal species and medium sensitivity for plant species. A site sensitivity verification report has been compiled which indicates that an aquatic/freshwater impact assessment will address the aquatic biodiversity theme and a botanical/ecological specialist will be appointed to address the terrestrial biodiversity and plant species themes. For the animal species theme, it indicates that a stand-alone animal species assessment will not be undertaken, however the theme will be attended to by the ecological/botanical specialist and the freshwater specialist. The conclusion states that a botanical/ecological/plant species/terrestrial/animal specialist and a freshwater impact assessment will be appointed.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Colin Johnson, Mr Paul Slack

The specialist studies which have been undertaken however do not match with the recommendations of the site sensitivity verification report. The specialist studies undertaken are an aquatic biodiversity assessment and an amphibian report. The terrestrial biodiversity and plant species themes have not been addressed. Therefore, either the site sensitivity verification report should be amended to indicate why specialist studies have not been undertaken or specialist studies must be undertaken to address these themes (or can be combined). We wish to note that according to the protocols, if the terrestrial biodiversity is of low sensitivity, a terrestrial biodiversity compliance statement is still required.

Aquatic Biodiversity Impact Assessment

The aquatic biodiversity screening study undertook wetland ground-truthing. The wetlands associated with the Mill Stream and tributary were confirmed with the ground-truthed extent slightly larger and the classification of the wetlands as unchannelled valley bottom wetland rather than floodplain wetlands due to the lack of a channel. The remainder of the property is occupied by instant lawn farming which has resulted in artificial wetland conditions on the surface due to the introduction of foreign soil and compaction along with irrigation. However, a section of this area was confirmed to support natural wetland conditions due to the presence of hydromorphic soils at a deeper level. This wetland was classified as a hillslope seep wetland.

The aquatic biodiversity impact assessment assessed the ecological condition and importance of the wetlands, with the unchannelled valley bottom wetlands rated as moderately modified present ecological state (PES) and high ecological importance and sensitivity (EIS), and the hillslope seep seriously modified PES and moderate EIS. The development layout avoids the unchannelled valley bottom wetlands and a 32 m buffer, however the hillslope wetlands are proposed to be developed with the motivation that this wetland is highly modified and does not support wetland habitat. The presence of the endangered Western Leopard Toad (*Sclerophrys pantherinus*) within the broader area is taken into account in the ecological value of the wetlands.

Several impacts are identified and assessed. The impact of the loss of the hillslope wetland is rated as medium significance and no mitigation is considered feasible. The impact on altered flow and water quality of the unchannelled valley bottom wetlands for both construction and operational phase is rated as low significance prior to mitigation and water quality is reduced to very low after mitigation. The proposed mitigation measures are supported and should all be implemented.

The residual impact (after mitigation) for the loss of wetlands of medium significance is within the threshold requiring an offset. A wetland offset is therefore recommended to remedy the loss of the wetland. However, the mitigation hierarchy must be applied before an offset can be considered. Avoidance should be the first option and therefore development layouts which avoid the hillslope wetland must be investigated before this option can be considered further. Should this not be feasible it will need to be well motivated. We further wish to note that two alternative development layouts have been presented however a comparison of the impacts has not been undertaken. Should it be confirmed that a wetland offset is the only feasible remedy, a wetland offset must be designed in accordance with the wetland offset best practice guidelines.

- The site sensitivity verification report must be amended to accurately reflect the outcomes of the site sensitivity verification in relation to the specialist assessments undertaken. The terrestrial biodiversity and plant species themes must be addressed in accordance with the protocols.
- The mitigation hierarchy must be followed whereby avoidance of the loss of wetland must first be investigated in the proposed layout before a wetland offset can be considered. Should avoidance and the other steps of the mitigation hierarchy be adequately motivated to not be feasible, then a wetland offset must be investigated in terms of the relevant guidelines. We recommend that both the Overstrand Municipality and CapeNature are consulted prior to finalization of the wetland offset.
- The amphibian report must be updated to an animal species impact assessment in accordance with the protocols. The potential presence of the SCCs in the screening tool must be assessed, with a particular focus on the Western Leopard Toad.
- The two proposed development layouts (as well as layouts which avoid the wetlands) must be assessed and compared in the specialist assessments.

Regards



Rhett Smart

For: Manager: Landscape Conservation Intelligence South

References:

Umvoto Africa. (2016). *Stanford Mill Stream Improvement Project – Mill Stream Hydrological Assessment*. Prepared by P. Lee, M. C. Munnik, K. Riemann and D. Blake for the Overstrand Local Municipality, Final Draft, Report No. 877/03/01/2016, January 2017.



Cnr Mountain Mill & East Lake Roads, Worcester 6850, Private Bag X 3055, Worcester, 6850

Enquiries: V. Ligudu Tel: 023-3468000 Fax: 023-3472012 E-mail: vligudu@bocma.co.za

Your Ref: 16/3/3/6/7/1/E2/37/1035/24

Our Ref: 4/10/2/G40L/ERF 438, STANFORD, CALEDON RD

DATE: 07/10/2024

Lornay Environmental Consulting
Po Box 1990
Hermanus
7200
Email: michelle@lornay.co.za

RE: APPLICATION FOR BASIC ASSESSMENT PROCESS FOR THE PROPOSED RESIDENTIAL DEVELOPMENT ON ERF 438, STANFORD CALEDON RD.

With reference to the above-mentioned document received by this office on the **03/09/2024**, requesting comments.

The Breede-Olifants Catchment Management Agency (BOCMA) has no objections on the proposed application subject to the following comments:

1. This office assessed the application and noted that part of the property is within a Regulated Area (floodplain wetland). The Regulated Area is defined under section 21 (c) and (i) of the National Water Act (Act 36 of 1998) as:
 - a) *The outer edge of the 1 in 100 year flood line and/or delineated riparian habitat, whichever is the greatest distance, measured from the middle of the watercourse of a river, spring, natural channel, lake or dam;*
 - b) *In the absence of a determined 1 in 100 year flood line or riparian area the area within 100m from the edge of a watercourse where the edge of the watercourse is the first identifiable annual bank fill flood bench; or*
 - c) **A 500m radius from the delineated boundary (extent) of any wetland or pan.**
2. The following water uses in terms of Section 21 of the National Water Act, 1998 (Act 36 of 1998) may be applicable:

Section 21 (c) – impeding or diverting the flow of water in a watercourse

Section 21 (i) – altering the bed, banks, course or characteristics of a watercourse

3. The proposed development will trigger section 21 (c) & (l) water uses in terms of the National water act and thus a water use authorisation application must be lodged with the Department of Water and Sanitation (www.dws.gov.za/ewulaasprod) before the development commences.
4. As stated in the “ Aquatic Biodiversity Screening, ERF 438 Stanford, Western Cape” report, a risk assessment matrix must be provided in terms of how high, medium or low the risk outcome is, to apply for the applicable authorization for the property.
5. Kindly provide proof from the municipality confirming the capacity to provide water and manage wastewater from the development. The proof must be forwarded to this office.
6. No activities may commence in the property without obtaining the required authorization.

General Conditions:

- All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered to.
- The disposal of sewage must at all times comply with the requirements of Sections 22 and 40 of the National Water Act of 1998, (Act 36 of 1998).
- In the event of water abstraction from any water resource, the necessary authorisation must be obtained from this office of the Department.
- No pollution of surface water or groundwater resources may occur.
- Stormwater management must be addressed both in terms of flooding, erosion and pollution potential.
- No stormwater runoff from any premises containing waste, or water containing waste emanating from industrial activities may be discharged into a water resource. Polluted stormwater must be contained.
- Please note that engaging in activity that triggers the National Water Act without authorisation is an offence and will result in the BOCMA taking legal action against the proponent in terms of Section 151 of the National Water Act, 1998 (Act 36 of 1998).

This office reserves the right to revise initial comments and request further information based on any additional information that may be received. The onus remains with the registered property owner to confirm adherence to any other relevant legislation that any activities might trigger and/or need authorization.

Please do not hesitate to contact the above official should there be any queries.

Yours faithfully

Liquuduwc

MR JAN VAN STADEN
CHIEF EXECUTIVE OFFICER (Acting)

michelle@lornay.co.za

From: Sheraine Van Wyk <sheraine.wcc@gmail.com>
Sent: Wednesday, 09 October 2024 17:43
To: michelle@lornay.co.za
Subject: Re: Notice of Public Participation | Erf 438 Stanford

Here is the comment following our last conversation on this property / proposed development.

The new culverts that were installed in the R43 bridge upgrade were due to a plea I made to the Environmental Consultants for the safe passage of fauna. This installation in effect reconnected the eastern arm of the Mill Stream to the west arm of catchment.

To encourage the endangered Western Leopard Toad in particular to use these culverts, I have requested that an area of at least 5m (preferably 10m) be vegetated with indigenous, low stature wetland vegetation of low maximum height so that the culverts remain visible to the animals. This implies suppressing reed growth in this area. Initial restoration of the area will be done by Guillaume Nel Environmental Consultants (with permission of the land owner) but subsequent maintenance (by land owner) will need to keep this objective in mind please.

I would also like to monitor the movement of the toads during the breeding season (July - Sept) to gauge how the animals are using the culverts please. This will require access to the property at night. Frog tourism holds an unrealised potential in Stanford and can potentially be done on the property. I am willing to assist with this in future.

Regards
Sheraine van Wyk



ENVIRONMENTAL MANAGEMENT & CONSERVATION DIVISION
PLANNING & DEVELOPMENT
AFDELING VAN OMGEWINGSBESTUUR & BEWARING
BEPLANNING & ONTWIKKELING

NAVRAE | ENQUIRIES : CHESTER ARENDSE | 028 384 8320
DATE | DATUM : 06 MARCH 2025

ASSISTANT ENVIRONMENTAL OFFICER (GANSBAAI ADMINISTRATION)
ENVIRONMENTAL MANAGEMENT & CONSERVATION DIVISION
GANSBAAI
7220

Dear Sir/Madam,

RE: Notice of Public Participation | Erf 438 Stanford

Your email dated 06th February 2025, please find attached comments from the Overstrand Environmental Management & Conservation Division regarding ERF 438:

Environmental buffers:

The proposed 32-meter wetland buffer, which is designated to become a private open space buffer is supported. The mitigation measures proposed in the Aquatic Biodiversity Assessment is supported and must be implemented.

Services:

The services plan indicates that the sewer line and sewer pump station will be located within the wetlands buffer area. The applicant should indicate what mitigation measures will be in place in the event of a pumpstation failure (mechanical or electrical) or sewer pipe burst. Comments from BOCMA regarding this location should also be obtained.

The Municipality reserves the right to revise these comments based on the availability of new information.

Regards

Chester Arendse

Assistant Environmental Officer
Environmental Management & Conservation Division
Overstrand Municipality

T: [+27 \(0\) 28 384 8320](tel:+27(0)283848320)
E: carendse@overstrand.gov.za



overstrand conservation foundation, trading as
whale coast
CONSERVATION

Caring for your environment

26 May 2025

Lornay Environmental Consulting
Attention: Michelle Naylor michelle@lornay.co.za

Dear Michelle

**COMMENT ON PRE-APPLICATION / DRAFT BASIC ASSESSMENT REPORT
PROPOSED RESIDENTIAL DEVELOPMENT ON ERF 438, STANFORD, CALEDON
DEADP Ref - 16/3/3/6/7/1/E2/37/1035/24**

The proposal outlined in the Basic Assessment Report (BAR) is for changes to a piece of highly environmentally-sensitive land, containing as it does - on land classified as Critically Endangered – firstly, three identifiable wetland areas and secondly, a remnant milkwood forest. The land is privately owned. It presents a sad case of abuse and neglect.

Although zoned for private residential use it has been used for agricultural purposes for many years, specifically for the production of roll-on lawn. This use has severely degraded a large wetland area known as the Hillside seep. Runoff from this use has also negatively impacted water quality in the two other wetland areas, most notably in the Millstream and environs.

Wetlands are protected under environmental legislation. The municipal officials who allowed these transgressions against both the legislation and the zoning regulations should be taken to task for their extreme negligence.

The remnant milkwood forest has also been the victim of environmental neglect, illustrated (for example) by the presence of many Alien Invasive Plants (AIPs), some of which are by now large mature trees and which are also present in quantity in the wetland areas.

The plans for the property are to return it to the correct zoning application and address some of the environmental issues. This will enable it to be marketed as a residential estate with a tourism component.

TEL +27 28 316 2527 FAX 086 695 0046 CELL +27 72 185 5726

E-MAIL wcc.greenhouse@gmail.com WEBSITE www.whalecoastconservation.org.za

Green House, R43 Vermont, Hermanus PO Box 1949 Hermanus South Africa 7200

PBO 130004541 NPO 020-771



1. Issues of concern

Whale Coast Conservation (WCC) welcomes the reversal in use to the correct zoning and voiced commitment to addressing the most egregious of the environmental problems. However, there are a number of issues that raise serious concerns. These include:

1.1 Inadequate mitigation of loss of Hillside seep

Wetlands are protected by environmental legislation. The functioning of the Hillside seep has been severely compromised by its use over many years as a site for the production of roll-on lawn. The proposal is to accept this degradation as a fait accompli and use the area for a housing development. The sale of such will no doubt be much more profitable for the owner than the continued unlawful production of roll-on lawn.

However, building houses on this area will of course totally destroy any opportunity for rehabilitation or improvement of the ecosystem services of the seep area.

In exchange for the total loss of the Hillside seep, the proposal is to protect the environs of the second wetland area, namely the Millstream and its surroundings from encroachment by the houses to be built on the areas adjacent to it. This is however nothing more than is demanded by the legislation that protects wetlands.

WCC is of the opinion that this is inadequate mitigation for the loss of a wetland area, however badly compromised.

1.2 Inadequate acknowledgement of the vegetation rating of the area

The terrestrial vegetation of the site is classified as Critically Endangered and Poorly Protected, comprising largely Agulhas Limestone Fynbos with a small area of Elim Ferricrete Fynbos. A full biodiversity impact assessment should have been done, rather than/as well as the Landscape Development Plan that has largely determined the nature of the ecological component of the proposed development.

Even in areas that have been severely neglected over many years, fynbos plants and their seeds will generally be dormant and under the right conditions will reappear.

This offers an opportunity for true eco-tourism, where clients can observe the restoration of previously degraded areas and be informed of (and possibly participate in) progress to this end. One essential component of such restoration is the removal of AIPs and the planting and encouragement of local indigenous plants, particularly those associated with the vegetation type.

1.3 Inadequate protection for the remnant milkwood forest

White Milkwoods (*Sideroxylon inerme*) are a protected tree species. Part of the property is home to a remnant milkwood forest. Before human encroachment destroyed the vast part of it, much of this coast housed an extensive interconnected swathe of milkwood forest inland from the dunes.

Milkwoods are social trees with branches that intertwine with each other to provide mutual support and a dense canopy that protects against damaging onshore winds, providing inter alia a sheltered environment for young trees - a healthy forest will include a mixture of trees of various ages. Apart from the presence of a mix of trees of varying ages, key to a functioning forest is non-disturbance of the root systems.

Plans for the property include making this remnant forest a tourism feature by providing accommodation in the forest by means of a series of small "pods" scattered through it. Page 39 (e.g.) notes that "The environmental services provided by the canopy area (Shade, wind break, sense of place) are taken advantage of to provide an 'eco-tourism' opportunity."



Elsewhere and frequently, this concept is posited as an opportunity to conserve the forest. However, it is merely an approach that provides a “photo-ready” backdrop for tourists. Whereas it may provide a backdrop for an attractive accommodation opportunity, it will continue the inexorable decline of what remains of the forest, rather than increase its viability.

2. Recommendations

Given the above, WCC recommends primarily that the tourism component of the proposal is reworked. This should include the following:

2.1 Concentration of accommodation in the lodge

The “Pod” concept offering accommodation within the forest will be damaging to the forest’s recovery and functioning. A considerable area of the whole will be covered by the pods – although much is made of their non-foundational construction, infrastructure and access for these 34 beds will add to their footprint considerably.

Tourist accommodation should be concentrated in the lodge building to be built on the existing footprint, which can be redesigned to offer more beds.

2.2 The full restoration of the milkwood forest without accommodation

The full restoration of the milkwood forest as a functional natural environment would go some way to mitigate the complete loss of the Hillside seep wetland area. As noted, the plan to introduce “Pod” accommodation within the forest is directed solely at the tourist market rather than ecological restoration. It will compromise the forest’s viability further.

2.3 Development of a plan for forest restoration

A comprehensive plan should be developed for the full restoration of the forest.

As noted on page 46 of the BAR, “A forest must be in a “largely natural and functional condition” in order to meet biodiversity target(sic) (and that) these trees do provide habitat for a number of birds and other small species.” The plan will thus need to take into account the promotion of biodiversity in the forest area, as plants other than trees are essential to its ecological functioning.

The milkwoods are the dominant but not the only plants in the forest, and a mix of other indigenous tree species such as wild olives must also be part of the restoration plan. Propagation and planting of young trees of various species should also be included in the plan, as a healthy forest will include trees of various ages.

This plan must take into account the growth pattern of the milkwoods and their need to accommodate the development of a supportive lattice. In order to facilitate this, the root networks also are highly interdependent and need protection.

The plan must also include the removal and disposal of AIPs within the area of the forest. This of course does not replace the legislative onus on the owner to remove and dispose of all AIPs elsewhere on the property, particularly those in the riparian area of the Millstream.



2.4 Development of tourism facilities in the forest

The full restoration of the forest area presents possibilities for non-accommodation tourism experiences based in the forest, such as birdwatching and guided walks and may entail the development of boardwalks and signage. Tourists could also be offered the opportunity to participate in the restoration of the forest by (e.g.) planting trees.

Yours sincerely

A handwritten signature in black ink that reads "PK Miller". The signature is written in a cursive style with a horizontal line underneath.

Dr PK Miller

Chair: Whale Coast Conservation

Tel: (028) 313-0093

Cell: 082 374-9729

pat.miller7@outlook.com



NPO: 024-867 PBO: 930079535

6 May 2025

Lornay Environmental Consulting

Attention: Ms Michelle Naylor

By email: michelle@lornay.co.za

Dear Michelle,

**RE: COMMENTS ON THE BASIC ENVIRONMENTAL AND HERITAGE ASSESSMENTS FOR
THE PROPOSED DEVELOPMENT ON ERF 438, STANFORD**

The Stanford Heritage Committee has reviewed the town planning application for consent use and associated departures distributed by Overstrand Municipality as part of the public participation and the SHC has commented on this as per attached letter.

Our comments on the two assessments include the following:

1. Architectural Guidelines and Departures

The development and proposed site development plan and accompanying architectural guidelines have been viewed as a stand-alone development detached from the heritage section of Stanford in a similar light to the other two residential estates in Stanford, namely, Klein River estate and Stanhaven situated on the eastern side of the R43, where Erf 438 is located. As such we have consented to the departures requested as per the attached letter/email to Overstrand Municipality and would like to architectural guidelines to be sympathetic to the adjacent architectural form and structure of the village and other residential estates. We would want to have sight and comment of the final architectural guidelines once finalised.

2. Adherence to NHRA

We have been led to believe that the existing structure on the Erf is older than 60 years. Adequate assessment is required to motivate for its demolition.

3. Leiwater / Millstream and Environmental Considerations

- The leiwater and wandelpad comprise central elements of the Stanford cultural landscape, and contribute to the sense of place of the village.
- A water use management plan should be put in place to monitor water runoff and usage into and from the Millstream both during and after construction.

- The [Millstream Master Plan](#), which the municipality has both endorsed and provided funding towards, indicates the Millstream north of the R43 as a proposed Nature Reserve, with the intention to extend the wandelpad to the Stanford Eye.
- We object, as have other organisations in Stanford such as Stanford Rate Payers and Stanford Conservation that the portion of the development adjoining the Millstream being fenced off for private use only. The development should find ways to allow public access and thoroughfare that does not compromise security, so that this proposal can be realised, and the resource enjoyed by the whole village.

To allow monitoring and inspection of the water resource, a municipal servitude should be created over the watercourse (possibly below the 15m contour) to ensure no unauthorised utilisation of the water from the Millstream. This will also facilitate public access through the property.

3. Naming

As highlighted in our comments on the town planning application, calling the new development "Stanford Green" is entirely inappropriate as it disregards and undermines the uniqueness of the Grade IIIA Stanford Village Green and as such another more suitable and appropriate name should be sought by the developer.

We trust these comments and concerns will be fed into the finalisation of the two reports.

Yours sincerely,



JAMES ALING
CHAIRPERSON

ANNEXURE A: COMMENTS TO OVERSTRAND MUNICIPALITY ON TOWN PLANNING APPLICATION



SHC Stanford Heritage Committee <stanfordheritage@gmail.com>

to Mike, Marilize

Mon, Apr 14, 3:17 PM ☆ 😊 ↶ ⋮

Afternoon Marilize,

The Stanford Heritage Committee reviewed the application at it's monthly meeting on 10 April 2025 and is in support of the application specifically:

- support the departure to increase in roof ridge height from 6.8m to 7.15m;
- SHC would like sight of and input into the detailed Architectural Design Guidelines;
- support consent use for hotel and conference facilities in addition to the residential use;
- support the street names, and
- support the departures on the building lines between the properties.

We would strongly urge and request the applicant/developer to consider changing the name of the development from Stanford Green - Eco Lifestyle Estate as there is already the Stanford Green, specifically the Stanford Village Green, which may cause confusion in the community and amongst visitors in addition to the fact that the name has always been associated and allocated to the village green for a very long time .

Regards,

James Aling

Chair: Stanford Heritage Committee





THE HERITAGE AND AESTHETICS COMMITTEE

MINUTES OF MEETING

Date: Thursday – 10th APRIL 2025

Time: 14h00 – 16h30

Mr N. Clark (Chair)
Mrs L. Fick (vice-chair)
Mr A. Greeff
Mr A. Finlayson
Mr J. Simson
Mr D. Swart
Mr E. Grobler

In Attendance for Overstrand:

Mr G. Coetzee (BCO) & Mrs E.A. Lowings (Admin)

6.2 **STANFORD : ERF 438 : R43 : SERISO 324 CC : PROPOSED SUBDIVISION, CONSENT USE, DEPARTURE, STREET NAMES (DEVELOPMENT EXCEEDING 5000m² (@ 52508m²), HPOZ & CONSERVATION AREA)** DISCUSSED. NICHOLAS CLARK RECUSED HIMSELF.

Comment:

Town Planning & HIA application authorized by Wrap Project Office dated 20/3/2025, application ID: 4738/2024 scrutinized. Supported, especially the proposed low density residentially scaled development. "Stanford Green" name not supported, already taken by the listed Public open space/commonage in Stanford. Note that it has come to our attention that a structure older than 60years ungraded occurs on the property.

Action:

Survey & motivation for demolition to be submitted to HWC.

NEXT MEETINGS : 15th MAY, 12TH JUNE & 10 JULY 2025

9. ADDITIONAL PUBLIC PARTICIPATION COMMENTING: HERITAGE

Heritage Western Cape requested that the report and Heritage Impact Assessment be made available for a further 30 day commenting opportunity to the relevant Heritage conservation bodies even though they were notified of the first round of public participation, as per the proof attached above. There relevant parties required were:

- **Overstrand Heritage and Aesthetics Committee**
- **Stanford Heritage Committee**
- **Whale Coast Conservation**

michelle@lornay.co.za

From: michelle@lornay.co.za
Sent: Wednesday, 02 April 2025 12:43
To: 'overstrandheritage@gmail.com'; 'stanfordheritage@gmail.com'; 'james.aling@spandp.co.za'; 'Pat Miller'
Cc: 'Jenna Lavin'
Subject: FW: Notice of Public Participation | Erf 438 Stanford
Attachments: Notice of Draft PPP 438.pdf

Importance: High

Dear All, the email stream below and letter attached has reference.

It appears that there was confusion regarding the public participation for the Basic Assessment and Heritage Impact Assessment commenting period as referred to below and as such, we have not received comment on the Application, more specifically the Heritage Impact Assessment, from the relevant conservation bodies being

- Stanford Heritage Comm – requested to be registered as I&AP on the 25/09/2024
- Overstrand Heritage and Aesthetics Comm
- Whale Coast Conservation

We hereby request comment on the application, specifically the Heritage Impact Assessment for the application with Heritage Western Cape.
Comment due by **6 May 2025**. *We would however appreciate the comments as soon as possible, as far as possible.*

The documents can be viewed on our website <https://lornay.co.za/documents/> or downloaded at the following link: <https://we.tl/t-nldA1vjic9>

Should you have any queries please contact me.

Kind regards



LORNAY

ENVIRONMENTAL CONSULTING

Michelle Naylor

M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAAs

Hemel & Aarde Wine Village – Unit 5/1F

PO Box 1990, Hermanus, 7200, South Africa

T +27 (0) 83 245 6556

E michelle@lornay.co.za | W www.lornay.co.za

Reg No. 2015/445417/07 | Vat. Reg. 429 031 9468

10. COMMENTS ON HERITAGE APPLICATION

Registered Heritage conservation bodies:



6 May 2025

Lornay Environmental Consulting

Attention: Ms Michelle Naylor

By email: michelle@lornay.co.za

Dear Michelle,

RE: COMMENTS ON THE BASIC ENVIRONMENTAL AND HERITAGE ASSESSMENTS FOR THE PROPOSED DEVELOPMENT ON ERF 438, STANFORD

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Our comments on the two assessments include the following:

1. Architectural Guidelines and Departures

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We trust these comments and concerns will be fed into the finalisation of the two reports.

Yours sincerely,



JAMES ALING
CHAIRPERSON

ANNEXURE A: COMMENTS TO OVERSTRAND MUNICIPALITY ON TOWN PLANNING APPLICATION



SHC Stanford Heritage Committee <stanfordheritage@gmail.com>

to Mike, Marize ▾

Mon, Apr 14, 3:17 PM ☆ 🌐 ↶ |

Allison Marize,

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Regards,

James Ailing

Chair, Stanford Heritage Committee



Stanford Heritage
P O Box 539 Stanford 7210 | stanfordheritage@gmail.com
www.stanfordconservation.org



THE HERITAGE AND AESTHETICS COMMITTEE

MINUTES OF MEETING

Date: Thursday – 10th APRIL 2025

Time: 14h00 – 16h30

Mr N. Clark (Chair)

Mrs L. Fick (vice-chair)

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Mr J. Simson

Mr D. Swart

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In Attendance for Overstrand:

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-
- 6.2 **STANFORD : ERF 438 : R43 : SERISO 324 CC : PROPOSED SUBDIVISION, CONSENT USE, DEPARTURE, STREET NAMES (DEVELOPMENT EXCEEDING 5000m² (@ 52508m²), HPOZ & CONSERVATION AREA)** DISCUSSED. NICHOLAS CLARK RECUSED HIMSELF.

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overstrand conservation foundation, trading as
whale coast
CONSERVATION

Caring for your environment

26 May 2025

Lornay Environmental Consulting
Attention: Michelle Naylor michelle@lornay.co.za

Dear Michelle

**COMMENT ON PRE-APPLICATION / DRAFT BASIC ASSESSMENT REPORT
PROPOSED RESIDENTIAL DEVELOPMENT ON ERF 438, STANFORD, CALEDON
DEADP Ref - 16/3/3/6/7/1/E2/37/1035/24**

The proposal outlined in the Basic Assessment Report (BAR) is for changes to a piece of highly environmentally-sensitive land, containing as it does - on land classified as Critically Endangered – firstly, three identifiable wetland areas and secondly, a remnant milkwood forest. The land is privately owned. It presents a sad case of abuse and neglect.

Although zoned for private residential use it has been used for agricultural purposes for many years, specifically for the production of roll-on lawn. This use has severely degraded a large wetland area known as the Hillside seep. Runoff from this use has also negatively impacted water quality in the two other wetland areas, most notably in the Millstream and environs.

Wetlands are protected under environmental legislation. The municipal officials who allowed these transgressions against both the legislation and the zoning regulations should be taken to task for their extreme negligence.

The remnant milkwood forest has also been the victim of environmental neglect, illustrated (for example) by the presence of many Alien Invasive Plants (AIPs), some of which are by now large mature trees and which are also present in quantity in the wetland areas.

The plans for the property are to return it to the correct zoning application and address some of the environmental issues. This will enable it to be marketed as a residential estate with a tourism component.

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1. Issues of concern

Whale Coast Conservation (WCC) welcomes the reversal in use to the correct zoning and voiced commitment to addressing the most egregious of the environmental problems. However, there are a number of issues that raise serious concerns. These include:

1.1 Inadequate mitigation of loss of Hillside seep

Wetlands are protected by environmental legislation. The functioning of the Hillside seep has been severely compromised by its use over many years as a site for the production of roll-on lawn. The proposal is to accept this degradation as a fait accompli and use the area for a housing development. The sale of such will no doubt be much more profitable for the owner than the continued unlawful production of roll-on lawn.

However, building houses on this area will of course totally destroy any opportunity for rehabilitation or improvement of the ecosystem services of the seep area.

In exchange for the total loss of the Hillside seep, the proposal is to protect the environs of the second wetland area, namely the Millstream and its surroundings from encroachment by the houses to be built on the areas adjacent to it. This is however nothing more than is demanded by the legislation that protects wetlands.

WCC is of the opinion that this is inadequate mitigation for the loss of a wetland area, however badly compromised.

1.2 Inadequate acknowledgement of the vegetation rating of the area

The terrestrial vegetation of the site is classified as Critically Endangered and Poorly Protected, comprising largely Agulhas Limestone Fynbos with a small area of Elim Ferricrete Fynbos. A full biodiversity impact assessment should have been done, rather than/as well as the Landscape Development Plan that has largely determined the nature of the ecological component of the proposed development.

Even in areas that have been severely neglected over many years, fynbos plants and their seeds will generally be dormant and under the right conditions will reappear.

This offers an opportunity for true eco-tourism, where clients can observe the restoration of previously degraded areas and be informed of (and possibly participate in) progress to this end. One essential component of such restoration is the removal of AIPs and the planting and encouragement of local indigenous plants, particularly those associated with the vegetation type.

1.3 Inadequate protection for the remnant milkwood forest

White Milkwoods (*Sideroxylon inerme*) are a protected tree species. Part of the property is home to a remnant milkwood forest. Before human encroachment destroyed the vast part of it, much of this coast housed an extensive interconnected swathe of milkwood forest inland from the dunes.

Milkwoods are social trees with branches that intertwine with each other to provide mutual support and a dense canopy that protects against damaging onshore winds, providing inter alia a sheltered environment for young trees - a healthy forest will include a mixture of trees of various ages. Apart from the presence of a mix of trees of varying ages, key to a functioning forest is non-disturbance of the root systems.

Plans for the property include making this remnant forest a tourism feature by providing accommodation in the forest by means of a series of small "pods" scattered through it. Page 39 (e.g.) notes that "The environmental services provided by the canopy area (Shade, wind break, sense of place) are taken advantage of to provide an 'eco-tourism' opportunity."



Elsewhere and frequently, this concept is posited as an opportunity to conserve the forest. However, it is merely an approach that provides a “photo-ready” backdrop for tourists. Whereas it may provide a backdrop for an attractive accommodation opportunity, it will continue the inexorable decline of what remains of the forest, rather than increase its viability.

2. Recommendations

Given the above, WCC recommends primarily that the tourism component of the proposal is reworked. This should include the following:

2.1 Concentration of accommodation in the lodge

The “Pod” concept offering accommodation within the forest will be damaging to the forest’s recovery and functioning. A considerable area of the whole will be covered by the pods – although much is made of their non-foundational construction, infrastructure and access for these 34 beds will add to their footprint considerably.

Tourist accommodation should be concentrated in the lodge building to be built on the existing footprint, which can be redesigned to offer more beds.

2.2 The full restoration of the milkwood forest without accommodation

The full restoration of the milkwood forest as a functional natural environment would go some way to mitigate the complete loss of the Hillside seep wetland area. As noted, the plan to introduce “Pod” accommodation within the forest is directed solely at the tourist market rather than ecological restoration. It will compromise the forest’s viability further.

2.3 Development of a plan for forest restoration

A comprehensive plan should be developed for the full restoration of the forest.

As noted on page 46 of the BAR, “A forest must be in a “largely natural and functional condition” in order to meet biodiversity target(sic) (and that) these trees do provide habitat for a number of birds and other small species.” The plan will thus need to take into account the promotion of biodiversity in the forest area, as plants other than trees are essential to its ecological functioning.

The milkwoods are the dominant but not the only plants in the forest, and a mix of other indigenous tree species such as wild olives must also be part of the restoration plan. Propagation and planting of young trees of various species should also be included in the plan, as a healthy forest will include trees of various ages.

This plan must take into account the growth pattern of the milkwoods and their need to accommodate the development of a supportive lattice. In order to facilitate this, the root networks also are highly interdependent and need protection.

The plan must also include the removal and disposal of AIPs within the area of the forest. This of course does not replace the legislative onus on the owner to remove and dispose of all AIPs elsewhere on the property, particularly those in the riparian area of the Millstream.



2.4 Development of tourism facilities in the forest

The full restoration of the forest area presents possibilities for non-accommodation tourism experiences based in the forest, such as birdwatching and guided walks and may entail the development of boardwalks and signage. Tourists could also be offered the opportunity to participate in the restoration of the forest by (e.g.) planting trees.

Yours sincerely

A handwritten signature in black ink, appearing to read "PK Miller", with a horizontal line underneath.

Dr PK Miller

Chair: Whale Coast Conservation

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11. REGISTERED INTERESTED AND AFFECTED PARTIES

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12. NOTICE OF FINAL PUBLIC PARTICIPATION

To be added

13. PROOF OF NOTICE OF FINAL ROUND OF PPP

To be added

14. COMMENTS RECEIVED DURING THE FINAL ROUND OF PUBLIC PARTICIPATION

To be added