LORNAY
ENVIRONMENTAL CONSULTING

IN PROCESS
BASIC ASSESSMENT REPORT

Rev 2

Proposed Spookdraai Residential Development
Remainder Portion 281, Struisbaai

11 November 2025

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Western Cape Government

Department of Environmental Affairs and Development Planning

BASIC ASSESSMENT REPORT

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

APRIL 2024

Western Cape Government

Department of Environmental Affairs and Development Planning

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

APRIL 2024

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

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

PROPOSED SUBDIVISION AND REZONING FOR THE CONSTRUCTION OF RESIDENTIAL ERVEN ON REMAINDER OF FARM 281, STRUISBAAI, BREDASDORP RD

GENERAL PROJECT DESCRIPTION

EXECUTIVE SUMMARY

Introduction and Project Overview

The development of the coastal portion of Remainder Farm Paapekuil Fontein No. 281, Struisbaai, is proposed as follows:

1. Subdivision of Remainder Farm Paapekuil Fontein No. 281 (422,62 ha) into:
- Remainder (Re/281 on Plan) of 421,9087 ha; and
- Portion A (A/281 on Plan) of 0,7113 ha (split potion) – Subject Area

2. Rezoning of Portion A from Agricultural Zone to Sub-Divisional Zone to make provision for residential erven on the coastal portion of the property.

The subject development area covers approximately 0.71 ha and lies within the urban edge of Struisbaai. It is located seawards of Marine Drive and separated from Marine Drive by the Marine Drive Road Reserve. The site is located within 100 m of the high-water mark and within the Coastal Protection Zone (CPZ) as defined by the National Environmental Management: Integrated Coastal Management Act (Act 24 of 2008). The proposed development is located above the 5 m contour.

In terms of the requirements of the National Environmental Management Act (NEMA) (Act 107 of 1998) and the EIA Regulations (2014) (As amended), the applicant is required to apply for Environmental Authorisation (EA) for the development. The original development concept has evolved in line with the requirements of NEMA and associated legislation and further refined through the public participation process. The current Preferred Layout (Alternative 5) represents a improved and responsive design, balancing residential demand with biodiversity, heritage, and coastal conservation objectives.

Site Context and Environmental Sensitivity

The site is located along the southern coastline of Struisbaai, and forms part of a broader coastal landscape. According to the Western Cape Biodiversity Spatial Plan (BSP, 2017), the area below the high-water mark and a narrow western margin of the property is classified as an Ecological Support Area 1 (ESA1), due to the presence of Agulhas Limestone Fynbos of medium sensitivity. The central and eastern sections of the site are mapped as Other Natural Areas and No Natural, reflecting historic disturbance and low ecological function.

Given its position within the Coastal Protection Zone (CPZ), the development was planned with full cognisance of coastal dynamics, climate change risks, sea-level rise, and storm-surge events. Consultation with the Department of Environmental Affairs and Development Planning (DEA&DP's) Coastal Management Unit (CMU) was held early in the process to ensure that the coastal constraints were adequately addressed and planned for. The Preferred Layout (Alternative 5) includes relaxation of the rear building line which allows for the maximum possible setback on each erf. The entire coastal strip below the High-Water Mark remains as the Admiralty Zone, and public access to the shoreline and beach is not restricted. Through the evolution of the layout alternatives, and the implementation of the Architectural Guidelines and Landscape Plan, the overall Heritage and Visual impacts have been reduced, and the proposal is supported by these specialists under Alternative 5. In line with the National Heritage Resources Act (NHRA) (Act 25 of 1999), the Heritage Impact Assessment and its supporting reports, will be submitted to Heritage Western Cape (HWC) after Public Participation 2 for final comment.

Summary of Specialist Inputs

The following specialist studies have been undertaken to inform the development application:

Terrestrial Biodiversity Impact Assessment (Appendix G1) – Confirmed that the site supports predominantly Southwestern Strandveld, with the Western area characterised by Agulhas Limestone Fynbos of medium sensitivity and therefore excluded from the development footprint as per Alternative 5.

Heritage Impact Assessment (Appendix G2) – Identified the site as part of a sensitive coastal cultural landscape associated with the historic fishing heritage of Struisbaai. The HIA recommended avoiding visually prominent dunes, retaining public access, and integrating architectural and landscape design in a manner that respects the local sense of place.

Archaeological Assessment (Appendix G3) – Confirmed that the proposed development does not pose a significant threat to local archaeological heritage resources.

Visual Impact Assessment (Appendix G4) – Determined that the coastal frontage is highly visually sensitive, leading to design refinements including height restrictions, building clustering, indigenous landscaping, and the use of earth-toned finishes to reduce visual contrast.

Palaeontological Assessment (Appendix G5) – Confirmed that the site has low palaeontological sensitivity, with standard monitoring procedures recommended during excavation.

Landscape Guideline Report (Appendix G6) – Provided design principles to integrate the development into its natural setting, guiding architectural form, colour palette, and landscape buffers.

Traffic Impact Assessment (Appendix G7) – Found that the proposed development will not significantly increase local traffic volumes and that Marine Drive has adequate capacity for the proposed residential use.

Terrestrial Animal Species Compliance Statement (Appendix G8) – Verified low faunal sensitivity, with mitigation measures for disturbance to coastal birds, including the African Black Oystercatcher (*Haematopus moquini*).

Civil and Services Report (Appendix G9) – Confirmed that bulk water, sewer, and electricity infrastructure can be provided within existing municipal capacity.

Layout Alternatives

Four design alternatives, and the No-Go Option, were evaluated during the assessment process.

Alternatives 1–3 involved layouts extending toward the western end of the site and were found to conflict with coastal biodiversity, heritage, and visual constraints as well as the principles of the Integrated Coastal Management Act (ICMA) (Act 24 of 2008).

Alternative 4 saw a reduction in the development footprint but retained some erven within visually sensitive areas with no detailed information in the form of Architectural Guidelines or Landscape Plans which limited the evaluation by Heritage and Visual specialist. In addition, all of the above layouts did not adequately consider or plan for the continuation of public access.

The final Preferred Layout (Alternative 5) has been developed in response to specialist input, legislation requirements and public participation feedback, and represents the most environmentally and technically viable option. It reclassifies the land use from Single Residential to Medium Density Residential which allowed for the relaxation of the rear building line to 0 m allowing for the maximum setback on each erf. In addition, Alternative 5 allows for improved accessibility of the coast and beach. Interpretation of this layout by a legal specialists confirmed that Alternative 5 sufficiently addresses the principles of ICMA (See **Appendix K**).

Public Participation and Authority Consultation

The Public Participation Process (PPP) has been undertaken in accordance with the NEMA and Environmental Impact Assessment Regulations (2014, as amended).

Public Participation Process 1 was undertaken from 31 January 2025 to 05 March 2025. Over 1000 comments were received during this period.

Key issues raised during PPP1 include:

- Compliance with ICMA and avoidance of coastal risk areas.
- Protection of biodiversity and faunal species.
- Preservation of heritage and visual landscape character.
- Public access to the shoreline; and
- Alignment with municipal planning and infrastructure capacity.
- Alternative 5 evolved in response to the comments and concerns raised.

Heritage, Visual, and Archaeological Considerations

The Heritage Impact Assessment (HIA) and Visual Impact Assessment (VIA) confirmed that the Spookdraai site contributes to the historic and scenic identity of Struisbaai. Through the implementation of Architectural Guidelines and Landscape Plans as well as mitigation relating to massing, heigh restriction, visual corridors etc., Alternative 5 is concluded to be acceptable from the Cultural Heritage perspective. The layout maintains public access (via Erf 7), preserves visual openness, and enforces context-appropriate architectural controls.

Process

This document is the *In Process Draft Basic Assessment Report* and distributed as part of the second round of Public Participation. Interested and Affected Parties (I&AP's) have been requested to register as I&AP's and provide their comments and input on this Basic Assessment Report as well as the Heritage Impact Assessment which will be submitted to Heritage Western Cape hereafter.

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

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

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

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

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

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

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

   DEADPEIAAdmin.George@westerncape.gov.za
   Directorate: Development Management (Region 3):
   Garden Route District Municipal area and Central Karoo District Municipal area

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	
Site Plan:	Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following: • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. • The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. • The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development **must** be clearly indicated on the site plan. • Servitudes and an indication of the purpose of each servitude must be indicated on the site plan.

	• Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): o Watercourses / Rivers / Wetlands o Flood lines (*i.e.,* 1:100 year, 1:50 year and 1:10 year where applicable); o Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): o Ridges; o Cultural and historical features/landscapes; o Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as **Appendix C**. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as **Appendix D**.
Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as **Appendix A3**.

ACRONYMS

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

ATTACHMENTS

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

The following checklist of attachments must be completed.

APPENDIX			**✓ (Tick) or x (cross)**
Appendix A:	**Maps**		
	Appendix A1:	**Locality Map**	✓
	Appendix A2:	**Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning**	
	Appendix A3:	**Map with the GPS co-ordinates for linear activities**	
Appendix B:	**Appendix B:**	**Site development plan(s)**	✓
	Appendix B2	**A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;**	
Appendix C:	**Photographs**		✓
Appendix D:	**Biodiversity overlay map**		✓
Appendix E:	**Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.**		
	Appendix E:	**Final comment/ROD from HWC**	✓
	Appendix E:	**Copy of comment from Cape Nature**	✓
	Appendix E3:	**Final Comment from the DWS**	N/A
	Appendix E4:	**Comment from the DEA: Oceans and Coast**	Pending
	Appendix E5:	**Comment from the DAFF**	N/A
	Appendix E6:	**Comment from WCG: Transport and Public Works**	N/A
	Appendix E7:	**Comment from WCG: DoA**	Pending

	Appendix E8:	**Comment from WCG: DHS**	N/A
	Appendix E9:	**Comment from WCG: DoH**	N/A
	Appendix E10:	**Comment from DEA&DP: Pollution Management**	N/A
	Appendix E11:	**Comment from DEA&DP: Waste Management**	N/A
	Appendix E12:	**Comment from DEA&DP: Biodiversity**	N/A
	Appendix E13:	**Comment from DEA&DP: Air Quality**	N/A
	Appendix E:	**Comment from DEA&DP: Coastal Management**	✓
	Appendix E:	**Comment from the local authority**	✓
	Appendix :	**Confirmation of all services (water, electricity, sewage, solid waste management)**	**See Appendix J**
	Appendix E:	**Comment from the District Municipality**	Pending
	Appendix E:	**Copy of an exemption notice**	N/A
	Appendix E:	**Pre-approval for the reclamation of land**	N/A
	Appendix E:	**Proof of agreement/TOR of the specialist studies conducted.**	N/A
	Appendix E:	**Proof of land use rights**	N/A
	Appendix E:	**Proof of public participation agreement for linear activities**	N/A
Appendix F:	**Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.** **Notice of Public Participation is attached**		✓
Appendix G:	**Specialist Report(s)** **Appendix G1 Terrestrial Biodiversity Impact Assessment** **Appendix G2 Heritage Impact Assessment** **Appendix G3: Archaeological Impact Assessment** **Appendix G4: Visual Impact Assessment** **Appendix G5: Palaeontological Impact Assessment**		✓

	Appendix G6: Architectural Guidelines **Appendix G7 Traffic Impact Assessment** **Appendix G8: Animal Species Compliance Statement** **Appendix G9a: Civil Roads and Services Report** **Appendix G9b: Civil Layout Plan** **Appendix G10a: Electrical Engineering Report** **Appendix G10b: Electrical Sleeve Layout** **Appendix G11a: Landscape Guidelines** **Appendix G11b: Landscape Plan 1** **Appendix G11c: Landscape Plan 2** **Appendix G12: Urban Edge Confirmation**	
Appendix H:	**EMPr**	✓
Appendix I:	**Screening tool report**	✓
Appendix J:	**Confirmation of all services**	✓
Appendix K:	**Legal Opinion Regarding ICMA**	✓
Appendix:	**Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline**	
Appendix…..	**Any other attachments must be included as subsequent appendices**	

SECTION A: ADMINISTRATIVE DETAILS

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

Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	Helemika Number 1 (Pty) Ltd	
Name of contact person for Applicant/Proponent (if other):	Michael Wurbach	
Company/ Trading name/State Department/Organ of State:	Helemika Number 1 (Pty) Ltd	
Company Registration Number:	200402233607	
Postal address:	-	
	-	Postal code:-
Telephone:	( )	Cell: 082 413 2874
E-mail:	michaelw@opes.co.za	Fax: ( )
Company of EAP:	Lornay Environmental Consulting	
EAP name:	Michelle Naylor	
Postal address:	Unit 5/1 F, Hemel and Aarde Wine Village,	
	Hermanus	Postal code: 7200
Telephone:	( )	Cell: 083 245 6556
E-mail:	michelle@lornay.co.za	Fax: ( )
Qualifications:	Master of Science (Rhodes University)	
EAP registration no:	2019/698	
Duplicate this section where there is more than one landowner Name of landowner:	N/A	
Name of contact person for landowner (if other):		
Postal address:		
		Postal code:
Telephone:	( )	Cell:
E-mail:		Fax: ( )
Name of Person in control of the land:	N/A	
Name of contact person for person in control of the land:		
Postal address:		
		Postal code:
Telephone:	( )	Cell:
E-mail:		Fax: ( )

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	Cape Agulhas Municipality
Contact person:	Environmental Manager

Postal address:	1 Dirkie Uys Street	
	PO Box 51	Postal code: 7280
Telephone	028 425 5500	Cell:
E-mail:	info@capeagulhas.gov.za	Fax: ( )

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

1.	Is the proposed development (please tick):	New	x	Expansion		
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.					
The subject property is classified as a coastal greenfield site, is undeveloped and consists of natural features such as rocky outcrops, indigenous vegetation and a rocky shoreline. The site has been disturbed by adhoc footpaths, general use and stormwater erosion from Marine Drive.						
~~3.~~	~~**For Linear activities or developments**~~					
~~3.1.~~	~~Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:~~					
~~3.2.~~	~~Development footprint of the proposed development for all alternatives.~~	~~m²~~				
~~3.3.~~	~~Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.~~					
~~3.4.~~	~~Indicate how access to the proposed routes will be obtained for all alternatives.~~					
~~3.5.~~	~~SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives~~					
~~3.6.~~	~~**Starting point co-ordinates for all alternatives**~~					
	~~Latitude (S)~~	~~º~~	~~'~~	~~"~~		
	~~Longitude (E)~~	~~º~~	~~'~~	~~"~~		
	~~**Middle-point co-ordinates for all alternatives**~~					
	~~Latitude (S)~~	~~º~~	~~'~~	~~"~~		
	~~Longitude (E)~~	~~º~~	~~'~~	~~"~~		
	~~**End point co-ordinates for all alternatives**~~					
	~~Latitude (S)~~	~~º~~	~~'~~	~~"~~		
	~~Longitude (E)~~	~~º~~	~~'~~	~~"~~		
~~**Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.**~~						
4.	**Other developments**					

4.1.	Property size(s) of all proposed site(s):	7113 m^2 0.71 ha
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):	0 m^2
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:	

ERF	ZONING	SIZE	TOTAL (m^2)
1	Medium Density Residential	512	
2	Medium Density Residential	489	
3	Medium Density Residential	462	
4	Medium Density Residential	470	
5	Medium Density Residential	474	
6	Medium Density Residential	476	2883
7	Open Space (Public)	3270	
8	Open Space (Private)	60	3330
9	Street: Private Road	900	900
		TOTAL	**7113**

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

The establishment of Spookdraai Residential development on the Remainder of the Farm 281, Struisbaai, is proposed. The subject property is approximately 7113 m^2 in extent and located within the Struisbaai urban edge as confirmed by the Cape Agulhas Municipality. The proposed development footprint, as well as the associated infrastructure, will result in a development footprint of approximately 2883 m^2 for 6 residential dwellings, internal access (900 m^2) and associated infrastructure. The final preferred alternative (Alternative 5) includes a larger Open Space (± 3270 m^2) (Erf 7) which can be accessed via a formalised raised walkway. This open space will provide the general public with access to the Spookdraai Beach and coastal area in line with the ICMA requirements and Coastal Public Access Audit (DEA&DP). A portion of the property which falls below the surveyed High-Water Mark is now designated as Admiralty Zone in the preferred Alternative and not designated as a Private Open Space.

Application is made for the following in terms of the Cape Agulhas Municipal Land Use Planning By-law, 2022:

1. In terms of Section 15(2)(d): Subdivision of Remainder Farm Paapekuil Fontein No 281 (422,62 ha) into:
    a. Remainder (Re/281 on Plan) of 421,9087 ha; and
    b. Portion A (A/281 on Plan) of 0,7113 ha (split potion).
2. In terms of Section 15(2)(a): Rezoning of Portion A Agricultural Zone to Sub-Divisional Zone to make provision for the following erven:
    a. Erf 1: Medium Density Residential Zone : 512m^2
    b. Erf 2: Medium Density Residential Zone : 489m^2
    c. Erf 3: Medium Density Residential Zone : 462m^2
    d. Erf 4: Medium Density Residential Zone : 470m^2
    e. Erf 5: Medium Density Residential Zone : 474m^2
    f. Erf 6: Medium Density Residential Zone : 476m^2
    g. Erf 7: Open Space: 3270m^2
    h. Erf 8: Open Space: 60m^2
    i. Erf 9: Street: Private Road: 900m^2

TOTAL: 7113m^2

Table 1: The proposed development and associated development footprint.

ERF	ZONING	SIZE	TOTAL (m^2)
1	Medium Density Residential	512	
2	Medium Density Residential	489	
3	Medium Density Residential	462	
4	Medium Density Residential	470	
5	Medium Density Residential	474	
6	Medium Density Residential	476	2883
7	Open Space	3270	
8	Open Space	60	3330
9	Street: Private Road	900	900
		TOTAL	**7113**

1. Residential Erven

The development allocates **2883 m^2** for the construction of six single residential erven as follows:

- → Erf 1: Medium Density Residential Zone : 512m^2
- → Erf 2: Medium Density Residential Zone : 489m^2
- → Erf 3: Medium Density Residential Zone : 462m^2
- → Erf 4: Medium Density Residential Zone : 470m^2
- → Erf 5: Medium Density Residential Zone : 474m^2
- → Erf 6: Medium Density Residential Zone : 476m^2

2. Open Space Erven

Two open space erven (Erf 7 and Erf 8) are proposed as part of the development layout (see **Figure 1**), with a total footprint of approximately 3 330 m^2 combined. The allocation of the open spaces has evolved in response to comments received during public participation and allow for continued general public access to the coastline and Spookdraai Beach via a formal boardwalk access on the western end of the site. Previous access routes along Marine Drive, the western portion of the property, and the eastern boundary and along the full length of the rocky shoreline, are retained, ensuring continuity of public movement and access through and around the development area.

The proposal includes the formalisation of the existing access route on the western end of the site. The formalised access to the coast will be via a timber walkway of approximately 20 m in length and 12 m in width. The placement of the timber walkway follows the existing informal access path on the western end of the property with the aim to provide safe access to the coast instead of the current eroded pathway, therefore no additional vegetation clearance will be required. In addition to the open space located in the western portion of the site, a smaller open space erf measuring 60 m^2 is proposed near the entrance of the private road. This space will accommodate a conservancy tank.

- → Open Space allowing continued public coastal access (Erf 7): 3270 m^2
- → Open Space for utilities: 60 m^2

Admiralty Zone

The Admiralty Zone, located below the High-Water Mark (HWM) as illustrated in the Site Development Plan, will remain undesignated coastal public property and continue to function as a public coastal zone under state ownership, ensuring continued public access along the shoreline. Access to and through the Admiralty Zone will not be restricted, allowing residents and visitors to move freely along the coastal edge in accordance with ICMA principles.

Along the beachfront boundary, the residential erven will be demarcated using low-impact security alarm beams and/or visually permeable fencing, to ensure security while maintaining visual connectivity to the sea and minimising disturbance to the natural coastal character. The public will still be able to pass along the shoreline as current.

3. Road and Refuse Erven

A private road will cover an area of approximately **900 m²** with a maximum width of **6 m** and a length of ± **160 m** will be constructed to provide internal access. Access to the site already exists off Marine Drive. A refuse room will be located near the entrance of the development.

4. Associated infrastructure

Water

There are existing services available to accommodate the proposed development, as confirmed by the municipality (refer to **Appendix J**). The maximum water pipe size required for the proposed development will be 110mm (0.11 m) in diameter and approximately 200m in length that will be linked to the existing 100mm municipal watermain located on the northern side of Marine Drive (MR261). All costs associated with the connection and installation of the new water supply infrastructure will be borne by the applicant

Sewer

The development will operate on a gravity sewer system, which will discharge into a conservancy tank. The conservancy tank will be serviced by the Cape Agulhas Municipality using a tanker extraction system. The tank is proposed to be located near the entrance of the access road and opposite the refuse room (see **Figure 2**). This location has been strategically chosen to facilitate easy access for municipal service vehicles, thereby ensuring efficient maintenance and regular emptying of the tank. A sewer pipeline of approximately 160 m in length and with a maximum diameter of 160 mm (0.16 m) will be installed to link the individual residential units to the conservancy tank.

Stormwater

Currently, there is no formal municipal stormwater management system along Marine Drive (MR261). However, an existing municipal stormwater outlet is located at the eastern boundary of the proposed development. This outlet serves the residential developments situated north of Marine Drive and discharges stormwater between erven 1995 and 1003. At present, the outlet discharges directly onto the proposed development site, resulting in erosion across the footprint of the proposed SR Erf 1. As part of the development proposal, this municipal stormwater flow will be redirected around the site via correctly engineered systems, to prevent further erosion and to ensure that stormwater from external sources does not impact the development footprint and shoreline.

Stormwater generated within the proposed development will be managed entirely on site through a combination of piped and overland flow systems. The major stormwater system will be accommodated within the road reserve and designed to convey flows from the 100-year storm event. In addition, a piped underground system will be designed to accommodate flows from the 2-year storm event, thereby addressing both frequent low-intensity storms and infrequent high-intensity storm events. The attenuation volume will be based on the post-development flow less the pre-development flow. In this manner, erosion and stormwater damage can be minimised and the existing ground water system can be recharged. All

erf and road levels within the proposed development will be shaped to create the necessary falls towards the proposed stormwater system.

The stormwater system from the proposed development will exit to the sea, but will be managed through a stormwater dissipation, silt and debris trap to prevent any contamination at the coast, with reno-mattresses at the overflow, to prevent any erosion. The same structure will be used at the realignment of the existing municipal stormwater system. These stormwater structures will be set back far enough to not be affected or affect the tidal conditions along the coast.

The maximum pipe size to be provided at the proposed development will be 450mm diameter.

Solid Waste

The refuse from the development will be collected by the Cape Agulhas Municipality. There will be refuse bins provided at each proposed residential unit, which will be taken weekly to the proposed on-site refuse room, which is situated close to the entrance of the proposed development. An adequate turning facility will be provided at the refuse room for the municipal refuse trucks.

Electricity

The Electrical Engineering Report (**Appendix G10a**) was prepared by Converge Consulting (Bright, 2025) to assess the electrical infrastructure requirements for the proposed development. The report confirms that the existing municipal electrical network in the vicinity is managed and maintained by the Cape Agulhas Municipality.

The proposed development has an anticipated maximum demand of approximately 67 kVA. Converge Consulting engaged with the Cape Agulhas Municipality, which confirmed that this capacity is available from an existing 250 kVA miniature substation located nearby. However, the current substation, originally manufactured in 1960, will need to be replaced as part of the infrastructure upgrades.

All necessary upgrades, including the replacement of the miniature substation, low-voltage main and distribution breakers, and all cabling from the substation to the development site, will be for the developer's account. Any additional on-site works will also be undertaken by the developer's appointed contractors. Furthermore, because Marine Drive is a provincial road, permission will be required from the provincial authorities to carry out the necessary road crossings for cabling installation.

Metering options for the development include either a maximum demand meter (78 kVA) with private metering arrangements or individual municipal prepaid meters for each erf. Should the latter option be implemented, each erf will be subject to a municipal property connection charge of approximately R14 500 per erf, in addition to the cost of the prepaid meter itself (to be confirmed upon quotation).

The Shared Network Costs (SNCs) applicable to the municipality's 400 V network are estimated at R197 650.00 (67 kVA @ R2 950.00). These costs will be borne by the developer in accordance with municipal requirements.

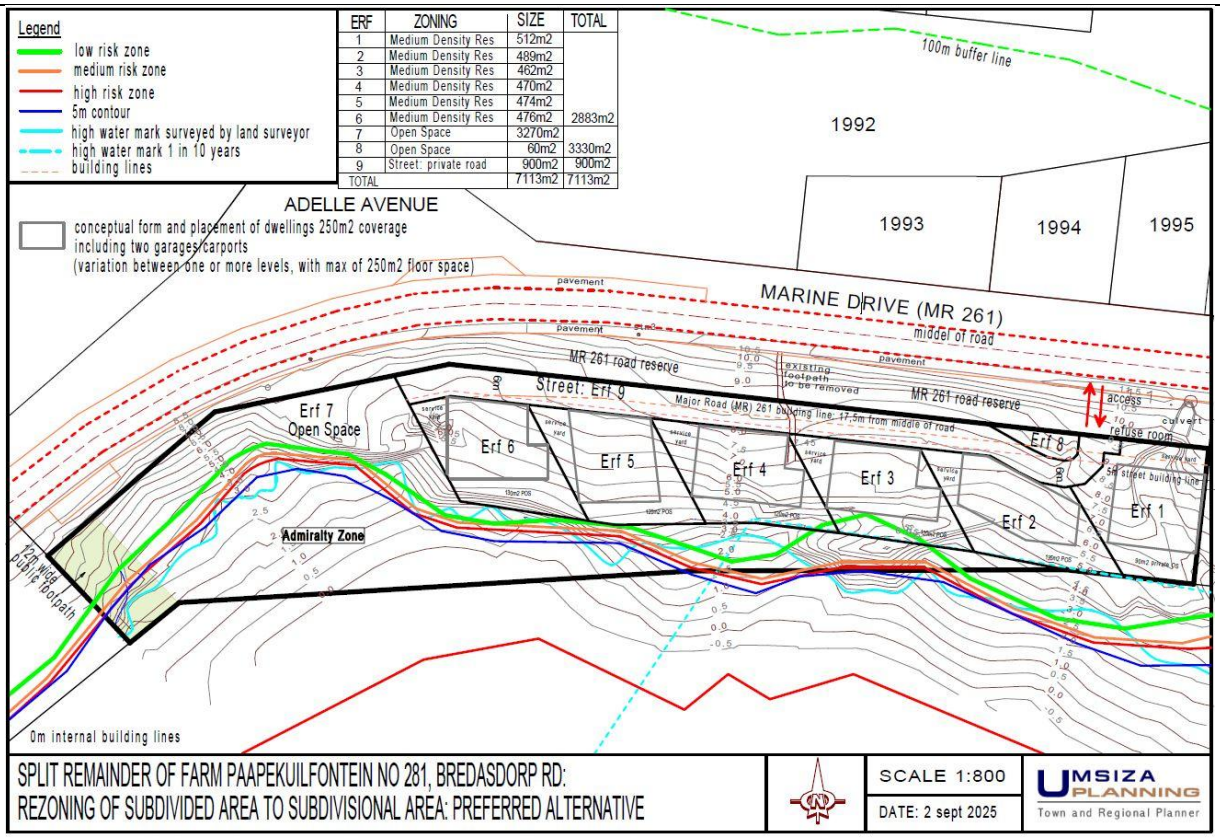


Figure 1: Proposed site development plan – Alternative 5 – final preferred layout.

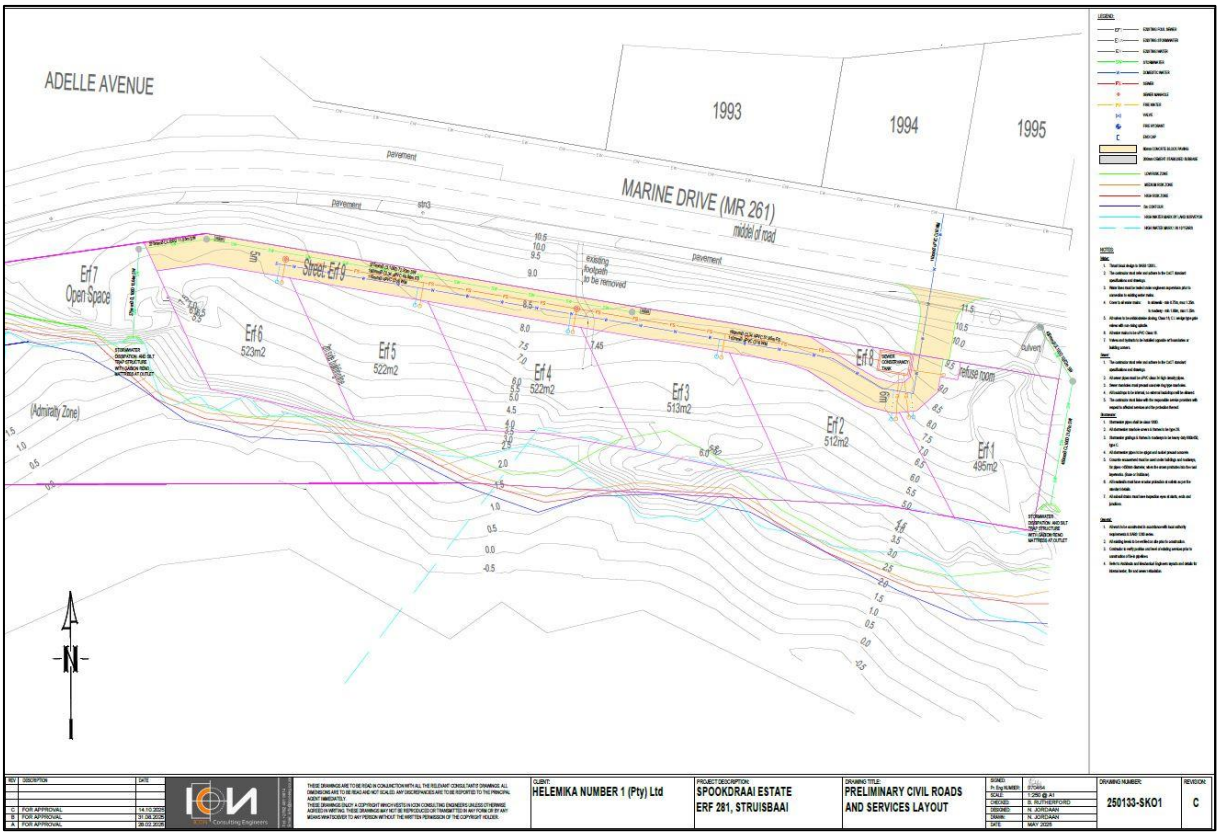


Figure 2: Civil layout plan.

Figure 3: Image showing the area proposed for the formal timber walkway, highlighted/circled in red. This walkway provides pedestrian access to the larger open space (Erf 7) while avoiding the clearance of indigenous vegetation.

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

Access is existing off Marine Drive. Crossing of the Road Reserve of Marine Drive will be required.

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	1	1	0	0	0	0	0	0	0	0	0	2	8	1	0	0	0	0	0

4.7.	Coordinates of the proposed site(s) for all alternatives:			
	Latitude (S)	34°	48’	49.18”
	Longitude (E)	20°	1’	54.57”

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

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

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

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

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

The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	YES X	NO
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	YES	NO X
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.	YES	NO X

3. Other legislation

List any other legislation that is applicable to the proposed activity or development.
-

4. Policies

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

1. <u>Cape Agulhas Municipality Spatial Development Framework, (2022-2027)</u>

The proposed development complies with the Cape Agulhas Municipality SDF. The property is located within the demarcated urban edge, as outlined in the SDF, which encourages development that aligns with the strategic urban growth objectives of the municipality. The SDF promotes compact, efficient urban areas to optimize the use of existing infrastructure while limiting urban sprawl.

The proposed subdivision and rezoning align with these principles by utilizing land within the urban edge to create a low-impact, well-planned opportunities. The development adheres to the SDF's goals of enhancing sustainable urban development and maintaining a balance between agricultural activities and urban growth. Furthermore, the provision of infrastructure within the development footprint ensures minimal impact on surrounding agricultural land uses, reinforcing the SDF's objectives of protecting agricultural resources while accommodating growth where appropriate.

2. <u>Cape Agulhas Municipal Integrated Development Plan (2024-2025)</u>

The Cape Agulhas Municipal IDP emphasizes sustainable development, urban consolidation, and the efficient use of land within the urban edge. The proposed development aligns with these objectives by being situated within the municipality's designated urban edge. This reduces urban sprawl and promotes densification in a manner consistent with the IDP's goals. Furthermore, the development will contribute to the local economy through construction activities and long-term property-related revenues, supporting the municipality's economic development objectives.

3. <u>Western Cape Provincial Spatial Development Framework (PSDF) 2014</u>

The PSDF promotes sustainable development through efficient land use, protection of agricultural and natural resources, and enhancement of socio-economic opportunities. By proposing the development within a built-up urban edge and on a site that no longer serves as productive agricultural land, the project aligns with the PSDF's directive to focus growth in already established urban areas, thereby reducing pressure on natural and agricultural landscapes.

4. Cape Agulhas Municipal Land Use Planning By-law, 2022

According to Section 15(1) of the Cape Agulhas By-law on Municipal Land Use Planning, 2022, no person may commence land development without the approval of the Municipality.

According to Section 15(2) the owner of such land may apply to the Municipality for, inter alia, the rezoning of land as well as the subdivision of land.

According to Section 24(1)(g), the subdivision of land does not require the approval of the Municipality in cases where the subdivision of agricultural land requires approval in terms of legislation regulating the subdivision of agricultural land (Act 70 of 1970); and does not lead to urban expansion.

Notwithstanding the fact that this subdivision falls within the promulgated "urban edge", this subdivision will lead to urban expansion in accordance with the SDF proposals and therefore is not exempted in terms of this By-Law.

5. Cape Agulhas Integrated Zoning Scheme (IZS) Regulations, 2022

According to the Cape Agulhas Integrated Zoning Scheme (IZS) Regulations, 2022, the application site is zoned "Agricultural Zone" (light green).

The IZS also makes provision for Sub-Divisional Area (SA) Zone.

The objective of this zone is to designate land where future subdivision and development rights are granted in terms of the Land Use By-Law and LUPA, as the case may be, subject to conditions including the submission of a detailed subdivision application.

This application entails the subdivision of the Subdivisional Area into six medium density residential zone erven, two open space erven and a private street.

Medium Density Residential Zone:

The purpose of this zone is to promote and regulate medium density residential development, such as group housing or town housing schemes; and to ensure that adequate provision is made for open space, community facilities, traffic circulation and parking.

Policy guidelines state that the design of the dwelling units, communal spaces and circulation areas must result in an architectural entity, and attention must be given to aesthetics, urban design and landscaping.

Applicable development Parameters are:

- → Density: Maximum 40 dwelling per ha
- → Height: 8m from highest point of natural ground level next to building
- → Street building line: 4m along external roads, 5m along declared roads (MR261)
- → 0m lateral or rear building lines
- → Garages: 0m setback from internal road
- → Open Space: Minimum outdoor living area of 25m^2 or 25% of floor area of the dwelling unit, whichever is the greatest, shall be provided on the erf containing the dwelling unit, and a minimum of 50m^2 per dwelling unit as public or communal open space (form: less than ratio of 2:1) within the medium density housing site.
- → Two parking bays per dwelling unit

- → Landscape plan needs to be prepared.
- → Service yard for each unit.
- → Min internal road width is 6m.
- → Minimum property size is 2500m^2.

Open Space Zone:

The purpose of this zone is to provide for active and passive open space.

Street Zone:

The purpose of this zone is to provide for public and private roads and streets.

The Municipality may allow utility services within this zone provided that such services do not compromise the movement of vehicles and / or pedestrians.

6. Struisbaai Spatial Development Framework 2022-2027

The Spatial Development Framework for Struisbaai 2022-2027 shows the new urban edge and proposed developments.

The "uitval" piece of R/Farm 281 is located within the urban edge and therefore earmarked for urban development.

The Struisbaai Spatial Development Proposals Plan shows "public space upgrade" all along the beach/seashore.

The application site is, however, privately owned, but will also make provision for adequate access to the beach / sea by means of a formal 12m wide public landscaped footpath to the beach.

The Struisbaai Environmental Protection and Heritage Plan show the following that have an impact on the application site:

- → Short (high risk zone), medium (medium risk zone) and long term (low risk zone) flood lines,
- → high water mark 1 in 10 years
- → 100m buffer
- → 5m contour

These are all indicated and considered in the proposed SDP. All erf boundaries are located outside these constraint lines, except one single residential erf that has a marginal area of low-risk zone at the bottom of its proposed erf boundary. Additionally, all the residential dwellings have been relocated further inland through the relaxation of the rear building line.

7. Subdivision of Agricultural Land Act, 1970 (Act 70 of 1970)

According to Section 3(a) of Act 70 of 1970, agricultural land shall not be subdivided unless the Minister has consented thereto, in writing.

As this application will lead to urban development in accordance with the approved SDF for Struisbaai, the Department of Agriculture will only support this subdivision of agricultural land after written approval of the subdivision and rezoning by the Cape Agulhas Municipality.

An application for the subdivision of this "uitval" piece of land from R/Farm Paapekuil Fontein No 281 will therefore be submitted to the national Department of Agriculture after receipt of municipal approval.

5. Guidelines

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal.

Guideline	Description
EIA Guideline and Information Document Series, dated March 2013: Applied to various components in the basic assessment process.	The following Guidelines were considered throughout this Basic Assessment Process: → Guideline for the Review of Specialist Input in the EIA process → Guideline for Environmental Management Plans → Guideline on Alternatives → Guideline on Need and Desirability → Guideline on Public Participation Process
Western Cape Biodiversity Spatial Plan Handbook and Guidelines (2023)	This guideline informed the assessment of the biodiversity context of the site. It was used to identify areas designated as Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs). The site was identified to be situated within the Ecological Support Area, as per Western Cape Biodiversity Spatial Plan (2017).

6. Protocols

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form

Agriculture Theme (Low Sensitivity)

The subject property is located within the demarcated urban edge, aligning with surrounding residential developments. Due to its small size, location along the coast and integration into the urban fabric, it is not suitable for farming. No further assessment is required for this theme.

Animal Species Theme (Medium Sensitivity)

The National Web-based Screening tool identified the site as having medium sensitivity for the animal species theme due to potential presence of two animal species of conservation concern. Additionally, another animal species of conservation concern which may likely be present onsite was added by Cape Nature. However, the site survey conducted by Venter (2025) confirmed that none of the animal species of conservation concern were observed onsite during site survey and no evidence of their presence was recorded. Therefore, the site

was assessed as having low terrestrial animal sensitivity and no Species of Conservation Concern are expected to be significantly impacted by the proposed development.

Aquatic Biodiversity Theme (Low Sensitivity)

The property is located along the coastal area of Struisbaai, and the National Screening Tool identifies the site as an area of low aquatic biodiversity sensitivity. No freshwater watercourses or natural wetlands are present on or adjacent to the subject erf, and the proposed development activities are situated above the 5 m contour line and outside of the mapped coastal risk zones. As such, the risk of direct impact on aquatic ecosystems is considered negligible.

Archaeological and Cultural Heritage Theme (Low Sensitivity)

The Archaeological Impact Assessment confirmed few traces of archaeological resources during the field survey, which were all graded as having Low (IIIC) local significance. The location and description of these archaeological resources are provided in Table 1 and illustrated in Figure 8 of the AIA. Based on these findings, it is concluded that the proposed residential development does not pose a significant threat to local Stone Age archaeological resources.

Civil Aviation Theme (High Sensitivity)

The proposed development is located within the adopted urban edge, as well as the built-up urban edge and is in line with the existing residential development in the area. No further assessment required.

Defence Theme (Low Sensitivity)

The proposed development is in line with the existing residential development in the area. No further assessment required.

Palaeontology Theme (Very High Sensitivity)

According to the South African Heritage Resources Information System (SAHRIS) Paleo-sensitivity Map, the proposed development area is indicated as having Very High palaeontological sensitivity. In line with this rating, a desktop and field-based Palaeontological Impact Assessment (PIA) was undertaken by John Pether (2025) for the proposed seafront development.

The PIA confirmed that the underlying Peninsula Formation (Ordovician age) is rated as High sensitivity due to its potential to contain trace fossils. However, the overlying superficial formations – including the Klein Brak Formation (raised beach deposits) and the Strandveld Formation (aeolian coversands) – were assessed to have Low palaeontological sensitivity in the project area. These deposits may contain fossil shells and occasionally vertebrate remains (marine mammals, seabirds), but such finds are rare and mostly of extant species with limited scientific value.

The PIA concluded that the proposed small-scale development is unlikely to significantly impact palaeontological resources. Nonetheless, because isolated fossil bones or shell deposits could be uncovered during earthworks, a Fossil Finds Procedure (FFP) has been recommended for inclusion in the Environmental Management Programme (EMPr). With the implementation of the recommended mitigation measures (FFP), the impact significance is assessed as Low Negative without mitigation, and Low to Medium Positive with mitigation, due to the potential for fossil recovery and scientific contribution.

Plant Species Theme (Medium Sensitivity)

According to the National Web-based Screening Tool, the site is classified as having medium sensitivity under the Plant Species Theme. This classification is linked to the potential occurrence of plant species of conservation concern associated with the underlying vegetation types in the study area. To address this, a Terrestrial Biodiversity Impact Assessment was undertaken by Dave McDonald of Bergwind Consulting, specifically covering the Plant Species Theme.

The SA Vegetation Map (2024) identifies two vegetation types within the property, namely Agulhas Limestone Fynbos (CR) on the western side and Southwestern Strandveld (EN) on the eastern side. The botanical specialist noted that Agulhas Limestone Fynbos is restricted to a very small area on the western end of the site, where limestone outcrops occur. However, the majority of the site, and particularly the eastern portion where the development footprint will be concentrated, is dominated by Southwestern Strandveld.

From an ecological sensitivity perspective, the development area on the eastern portion of the property is considered to have low sensitivity vegetation (Southwestern Strandveld). In contrast, the western portion, where a timber walkway is proposed under the preferred layout (Alternative 5), supports vegetation characteristic of Agulhas Limestone Fynbos. However, the placement of the timber walkway has been carefully placed within an already disturbed area, ensuring that no clearance of indigenous vegetation will be required for its placement. The design approach ensures that clearance and loss of vegetation in areas of higher ecological value, specifically the western portion is avoided. Importantly, the botanical survey confirmed that no plant species of conservation concern were recorded on the property during field surveys. As such, the proposed development is not expected to result in significant impacts on plant species of conservation concern.

Terrestrial Biodiversity Theme (Very High Sensitivity)

A Terrestrial Impact Assessment was undertaken by Dave McDonald of Bergwind Consulting to assess the broader terrestrial biodiversity sensitivity of the site. According to the SA Vegetation Map (2024), the property falls within the Agulhas Limestone Fynbos (Critically Endangered) and Southwestern Strandveld (Endangered) vegetation types. Furthermore, the Western Cape Biodiversity Spatial Plan (2017) identifies the western portion of the property as an Ecological Support Area (ESA), highlighting its role in supporting ecological processes and maintaining connectivity. The eastern portion of the site contains patches mapped as Other Natural Areas (ONAs), which, while not formally prioritised for biodiversity conservation, still contribute to the overall natural character of the site.

The eastern portion of the site, where the development footprint is proposed, is classified as supporting low-sensitivity vegetation. In contrast, the western portion of the site, which contains areas of Agulhas Limestone Fynbos, is regarded as being of medium sensitivity. In the preferred layout alternative (Alternative 5), this western section will not be subjected to development activities. The only intervention proposed is the placement of a formal walkway to provide access to the open space. The area identified for the walkway is already disturbed and currently used for access and therefore does not support intact indigenous vegetation. The design ensures that no clearance of vegetation will be required in this section, and disturbance will be confined to the existing transformed footprint.

The botanical survey confirmed that no plant species of conservation concern were identified on the property during site investigations. As such, the proposed development is not anticipated to result in significant residual impacts on terrestrial biodiversity.

Summary of themes and site sensitivities as per online DFFE GIS Mapping Screening Tool:

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

Specialist Assessments identified for inclusion in the assessment report:

Landscape /Visual Impact Assessment

A Visual Impact Assessment has been undertaken (refer to **Appendix G4)**

Archaeological and Cultural Heritage Impact Assessment

The Heritage Impact Assessment which consisted of the Archaeological Impact Assessment (AIA), Palaeontological Impact Assessment (PIA) and the Visual Impact Assessment (VIA) have been undertaken. The Archaeological Impact Assessment confirmed few traces of archaeological resources that were recorded during the field survey, which were all been graded as having Low (IIIC) local significance. The location and description of these archaeological resources are provided in Table 1 and illustrated in Figure 8 of the AIA. Based on these findings, it is concluded that the proposed residential development does not pose a significant threat to local Stone Age archaeological resources.

Palaeontology Impact Assessment

The PIA concluded that the proposed small-scale development is unlikely to significantly impact palaeontological resources. Nonetheless, because isolated fossil bones or shell deposits could be uncovered during earthworks, a Fossil Finds Procedure (FFP) has been recommended for inclusion in the Environmental Management Programme (EMPr). With the implementation of the recommended mitigation measures (FFP), the impact significance is assessed as Low Negative without mitigation, and Low to Medium Positive with mitigation, due to the potential for fossil recovery and scientific contribution.

Terrestrial Biodiversity Impact Assessment

A Terrestrial and Botanical Assessment was undertaken, forming the basis of the Terrestrial Biodiversity Assessment (see **Appendix G1**).

Aquatic Biodiversity Impact Assessment

The site has no mapped watercourse or wetlands. No further specialist input required.

Socio-Economic Assessment

The proposed development of six residential dwellings will result in limited but positive social and economic benefits for the local community. The scale and nature of the project are consistent with the surrounding land

uses and existing residential character of Struisbaai. The evolution of the layout alternatives has addressed concerns relating to coastal access and has allowed for the continued access of the community to the coast and beach at Struisbaai. No further socio-economic specialist assessment is considered necessary.

A Traffic Impact Assessment (TIA) was undertaken to confirm the potential transport implications of the development. Observations indicate that intersections in the vicinity of the site have sufficient capacity to accommodate the small number of additional trips that will be generated as a result of the development. As such, the transport impact is considered negligible, and no specific road upgrades are required, other than provision of an appropriate access point off Marine Drive (see Appendix G7).

Plant Species Assessment

The specialist assessment was covered under the Terrestrial Impact Assessment.

Animal Species Assessment

The Animal Species Compliance Statement was undertaken by Venter, (2025). No animal species of conservation concern were identified during site survey. Therefore, the site has been assessed as having low terrestrial animal sensitivity (see Appendix G8).

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 1**	Describe the portion of the proposed development to which the applicable listed activity relates.
17	Development— (i) in the sea; (ii) in an estuary; (iii) within the littoral active zone; (iv) in front of a development setback; or (v) if no development setback exists, within a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater; in respect of— (a) fixed or floating jetties and slipways; (b) tidal pools; (c) embankments; (d) rock revetments or stabilising structures including stabilising walls; or (e) infrastructure or structures with a development footprint of 50 square metres or more	The proposal entails the construction of six single residential dwellings and associated infrastructure. The development footprint exceeds 50 m^2 and are located within 100 metres inland of the high-water mark.
19A	The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from— (i) the seashore; (ii) the littoral active zone, an estuary or a distance of 100 metres inland of the highwater mark of the sea or an estuary, whichever distance is the greater; or (iii) the sea; — but excluding where such infilling, depositing , dredging, excavation, removal or moving— (f) will occur behind a development setback; (g) is for maintenance purposes undertaken in accordance with a maintenance management plan; (h) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (i) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or 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.	The proposed residential development will require earthworks involving the excavation, removal, and movement of soil in excess of 5 m^3 within 100 metres inland of the high-water mark to accommodate foundations, services, and associated infrastructure.
Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 3**	Describe the portion of the proposed development to which the applicable listed activity relates.
12	The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for	The vegetation on site is classified as Southwestern Strandveld, an endangered ecosystem. Clearance of approximately

	maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;	3783 m^2 of indigenous vegetation will be required to accommodate the development) and associated infrastructure including water, sewer, and stormwater services.
Note: • The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted. • Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.		

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

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

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

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

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

The proposed Spookdraai development is located on the Remainder of Farm 281, Struisbaai. The site is situated within a narrow coastal strip with a rocky sandstone shoreline, on the seaside of Marine Drive. The Marine Drive road reserve is located between Marine Drive and the subject property.

Figure 4-1: View of the subject property.

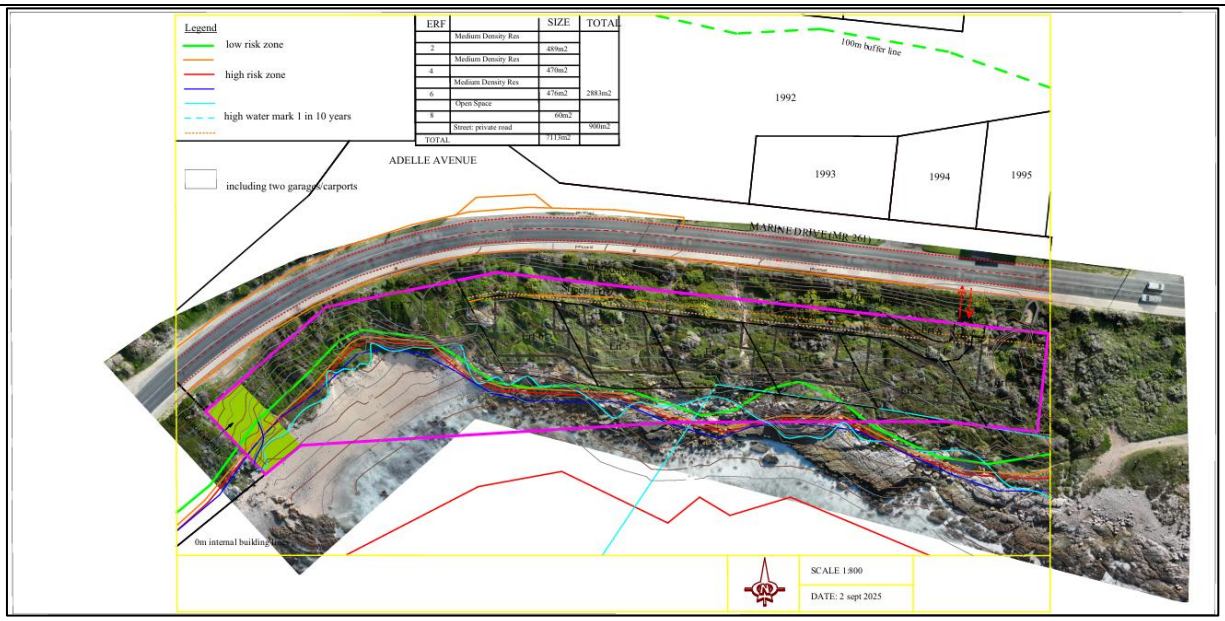


Figure 4-2: Drone image for the site with Alternative 5.

The proposed development entails the subdivision of the property to establish residential erven, open space, and service infrastructure components. Six residential erven (Erf 1 – 6) are planned with a combined footprint of approximately 2 883 m^2, while two open space erven are included on Erf 7 (3 270 m^2) and Erf 8 (60 m^2) together covering a footprint of 3 330 m^2. In addition, a private internal road (Erf 9) with a footprint of approximately 900 m^2 will be developed, accommodating associated bulk service infrastructure such as sewer, water pipelines, and stormwater management systems. The total development footprint amounts to approximately 7 113 m^2. Furthermore, the formalisation of the existing beach access path on the western end of the site is proposed. This access will remain public in compliance with the requirements of the Integrated Coastal Management Act (Act 24 of 2008) (ICMA).

The proposal is detailed as follows:

Residential Erven

The subdivision of the property to create six residential erven is proposed. The construction of the houses will utilize conventional foundations and adhere to modern building practice in line with the recommendations from the Visual Assessment, Architectural Guidelines Document and Landscape Plan (See **Appendix G4** and **Appendix G6**). The residential units will be constructed within a controlled building envelope and set back as far on the individual erf as possible through the relaxation of the rear building line to 0 m. The intention is to limit excessive coverage on sites and to ensure a maximum area of natural fynbos between houses as well as maximum space between southern building line and the high-water mark. The restriction of the footprint aims to reduce the overall visual impact of the development. With the property sizes being relatively small and the form and slope of the site being difficult to work with, it is intended to limit the footprint and coverage to 50 % of each erf.

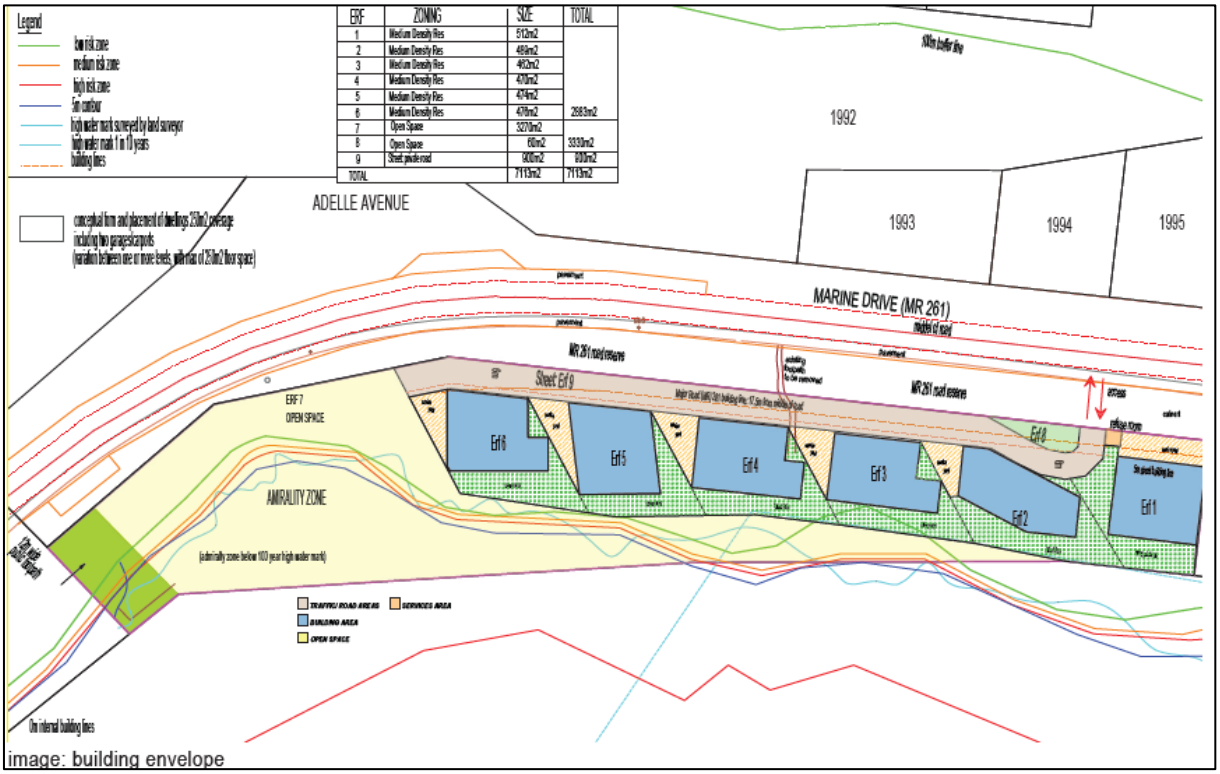


Figure 5. Extract from Architectural Guideline document, showing the building envelope of the proposed development. Note the road reserve which separates the subject property and Marine Drive

Open Space Erven

Two open space erven are included in the development proposal.

- → Erf 7: Open Space Zone: 3270m^2 – comprises the beach area, access boardwalk and forms a communal open space.
- → Erf 8: Open Space: 60m^2

Road and Refuse Erven

- → A private road (Erf 9) covering a footprint of approximately 900 m^2 with a maximum width of 6 m and a length of 160 m will be constructed to provide access to the proposed residential development and accommodate associated bulk service infrastructure such as sewer, water pipelines, and stormwater management systems.
- → A refuse room will be located near the entrance of the development to facilitate waste collection and provide adequate access for municipal refuse vehicles.

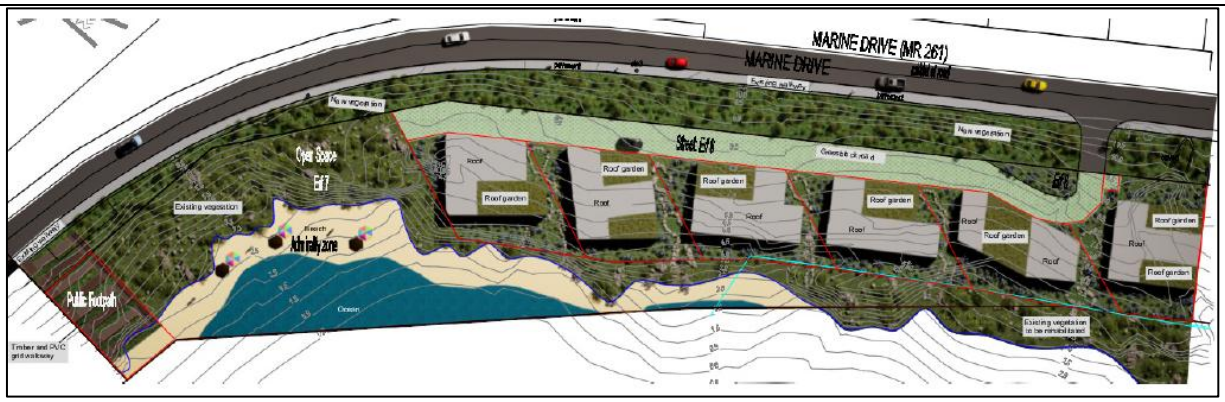


Figure 6: The proposed site development plan as per the Landscape Guideline Document.

Bulk Services

See Civil and Electrical Engineering Report attached under **Appendix G9a to G10b**.

Water

- → There is an existing 100 mm municipal watermain located on the northern side of Marine Drive (MR261). The proposed development would be required to link to this existing watermain and to provide a bulk water for the Cape Agulhas Municipalities metering process.
- → The ground level heights of the proposed development will not provide any low water pressure problems, as it is situated directly below the Struisbaai municipal water reservoirs, and the existing level difference is approximately 54 m.
- → The maximum water pipe size for the proposed development will be 110 mm diameter.
- → The internal water pipes will be sized to cater for the proposed development's peak water demand and fire requirements and will be constructed to the Cape Agulhas Municipalities minimum acceptable standards. The developer will provide the entire water network including all pipes, valves, hydrants and bends.
- → The water pipelines will be installed behind the road edge and will follow the existing roads as far as possible. The water pipelines will be installed in trenches up to 1 m deep and 700 mm wide.
- → The Cape Agulhas Municipality has provided confirmation of services; however alternative water resources have been factored into the design i.e. rainwater harvesting and water saving devices.
- → The water connection to the proposed development will be taken from the existing municipal watermain at Marine Drive (Provincial Main Road MR261).

Sewer

- → The existing municipal sewer infrastructure along Marine Drive (MR261) currently comprises of septic tanks and conservancy tanks. No municipal gravity pipeline system currently exists.
- → The proposed development will be required to operate off a gravity sewer system that is linked to a conservancy tank for the municipality to extract the sewerage with a tanker system. If the municipality installs a bulk gravity sewer system, the conservancy tank could be converted to a sewer pump station, and the sewerage could be pumped to the municipal gravity sewer system.
- → The maximum sewer pipe size will be 160 mm (0.16 m) diameter.
- → The sewer pipes for the proposed development will be sized to cater for the proposed development's peak flow conditions. The sewer system will comprise of a waterborne gravity sewer system and a conservancy tank system, and all areas of the proposed development will be served with sewer connections.

- → The sewer pipelines will be installed under the surfaced road area and will follow the existing roads as far as possible. The main pipelines will be installed in trenches up to 2.5 m deep and 0.8m (800 mm) wide. The erf sewer connections will be 1.2 m deep.
- → The sewer reticulation will consist of 110 mm and 160 mm class 34 heavy duty uPVC solid wall pipes.
- → The sewer from the proposed development will connect to a conservancy tank system that will be serviced by the Cape Agulhas Municipality as per the municipal service confirmation letters.

Roads

- → The proposed development is adequately serviced by Marine Drive (Provincial Main Road MR261). The access to the proposed development will be taken off Marine Drive (Provincial Main Road MR261). The new internal road access will be designed to allow sufficient entry and exit lanes to the various areas of the proposed development. All roads and turning circles will be of a suitable width and radius to allow the comfortable movement of passenger, municipal, refuse and emergency vehicles and all roads will be designed to provide access to the proposed erven.
- → The internal road will cover a footprint of approximately 900 m^2 with a maximum width of 6 m and a length of 160 m.

Stormwater

- → No municipal stormwater management system exists on Marine Drive (MR261), but an existing municipal stormwater outlet exists on the eastern boundary of the proposed development. This municipal stormwater system is an outlet for the residential developments to the north of Marine Drive and exits between erven 1995 and 1003. It must be noted that this stormwater system drains onto the proposed development and would need to be redirected around the proposed development as it is currently causing erosion across the proposed SR Erf 1.
- → The stormwater flow from the proposed development will be accommodated in the proposed development. The major system will be accommodated within the road reserve area and will be based on the 100-year storm event and the piped underground stormwater system will be designed to accommodate the 2-year storm event. The attenuation volume will be based on the post-development flow less the pre-development flow. In this manner, erosion and stormwater damage can be minimised and the existing ground water system can be recharged. All erf and road levels within the proposed development will be shaped to create the necessary falls towards the proposed stormwater system.
- → The stormwater system from the proposed development will exit to the sea, but will be managed through a stormwater dissipation, silt and debris trap to prevent any contamination at the coast, with reno-mattresses at the overflow, to prevent any erosion. The same structure will be used at the realignment of the existing municipal stormwater system. These stormwater structures will be set back far enough to not be affected or affect the tidal conditions along the coast. The maximum pipe size to be provided at the proposed development will be 450mm (0.45 m) diameter.
- → A Stormwater escape route has been designed for between each erf as illustrated in **Figure 7** below.

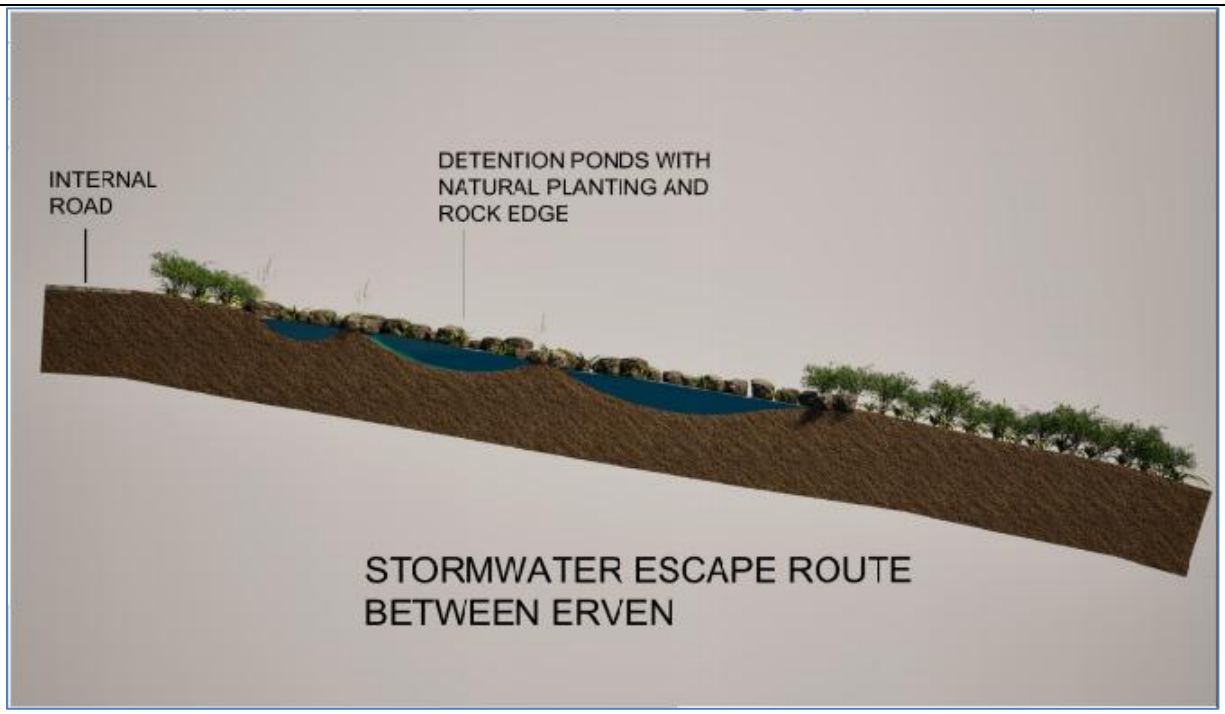


Figure 7: Stormwater escape route between erven as per Stormwater Plan

Note: The stormwater infrastructure does not exceed 1000 m in length.

Solid Waste

→ The refuse from the development will be collected by the Cape Agulhas Municipality. There will be refuse bins provided at each proposed residential unit, which will be taken weekly to the proposed refuse room, which is situated close to the entrance of the proposed development. An adequate turning facility will be provided at the refuse room for the municipal refuse trucks.

Electricity

→ The evaluation of the developments electrical requirements has been undertaken by Converge Consulting.
→ Converge Consulting has engaged with Cape Agulhas Municipality and have received feedback that the proposed anticipated maximum demand of approximately 67kVA is available from an existing nearby 250kVA miniature substation
→ The minisub was manufactured in 1960 and will therefore need to be replaced as part of the development.
→ All upgrades to infrastructure including minisub, LV main and distribution breakers in the substation will be for the developer's account, and all cabling from the substation to the site and all other work on site must be done by the developer's contractors.
→ Marine Drive is a provincial road and permission to do road crossings must be obtained from province. The metering to the development can either be a maximum demand meter (78KVA) with private metering, or each erf can have a municipal prepaid meter.

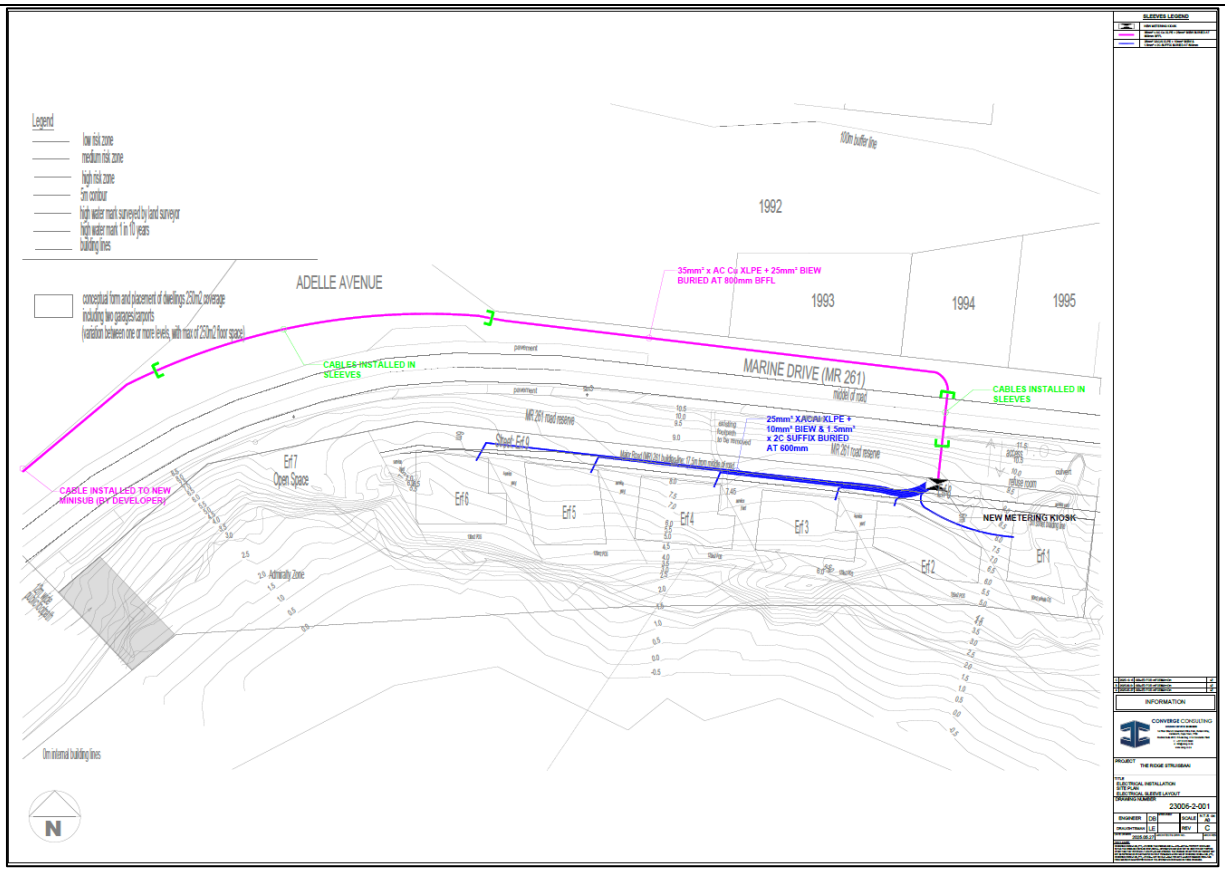


Figure 8. Electrical Sleeve Layout Plan – See Appendix G10

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

According to the Cape Agulhas Integrated Zoning Scheme (IZS) Regulations, 2022, the application site is zoned "Agricultural Zone" (light green).

The IZS also makes provision for Sub-Divisional Area (SA) Zone.

The objective of this zone is to designate land where future subdivision and development rights are granted in terms of the Land Use By-Law and LUPA, as the case may be, subject to conditions including the submission of a detailed subdivision application.

This application entails the subdivision of the Subdivisional Area into six medium density residential zone erven, two open space erven and a private street.

<u>Medium Density Residential Zone:</u>

The purpose of this zone is to promote and regulate medium density residential development, such as group housing or town housing schemes; and

To ensure that adequate provision is made for open space, community facilities, traffic circulation and parking.

Policy guidelines state that the design of the dwelling units, communal spaces and circulation areas must result in an architectural entity, and attention must be given to aesthetics, urban design and landscaping.

Applicable development Parameters are:

- → Density: Maximum 40 dwelling per ha
- → Height: 8m from highest point of natural ground level next to building
- → Street building line: 4m along external roads, 5m along declared roads (MR261)
- → 0m lateral or rear building lines
- → Garages: 0m setback from internal road
- → Open Space: Minimum outdoor living area of 25m^2 or 25% of floor area of the dwelling unit, whichever is the greatest, shall be provided on the erf containing the dwelling unit, and a minimum of 50m^2 per dwelling unit as public or communal open space (form: less than ratio of 2:1) within the medium density housing site.
- → Two parking bays per dwelling unit
- → Landscape plan needs to be prepared.
- → Service yard for each unit.
- → Min internal road width is 6m.
- → Minimum property size is 2500m^2.

Open Space Zone:

The purpose of this zone is to provide for active and passive open space. The design of the open space provide continued and accessible open space for the general public, as well as formalised public access to the beach, ensuring compliance with the requirements of the Integrated Coastal Management Act (ICMA).

Street Zone:

The purpose of this zone is to provide for public and private roads and streets.

The Municipality may allow utility services within this zone provided that such services do not compromise the movement of vehicles and / or pedestrians. The proposed private internal road (Erf 9) has been designed to meet this requirement and will also accommodate associated bulk service infrastructure (water, sewer, and stormwater).

Although the property is currently zoned for agricultural use, its location within the demarcated urban edge and adjacency to an established residential area strongly support its suitability for the intended development. The application therefore includes provisions for rezoning and subdivision to ensure compliance with the IZS, the Land Use By-Law, and LUPA.

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

There are no existing approvals applicable to the proposed site. The property is currently undeveloped and has not been subject to any prior land use or environmental authorisations. Accordingly, no conflicts arise between existing approvals and the proposed development.

An application for the proposed development has been submitted in terms of the Cape Agulhas Municipal Land Use Planning By-law, 2022.

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

Extract from the Western Cape Provincial Spatial Development Framework 2014:

Spatial Goals

To address the spatial challenges identified, the PSDF takes the Western Cape on a path towards:

I. More inclusivity, productivity, competitiveness and opportunities in urban and rural space-economies;

II. Better protection of spatial assets (e.g. cultural and scenic landscapes) and strengthened resilience of natural and built environments; and

III. Improved effectiveness in the governance of urban and rural areas.

The proposed development is located within the urban edge of Struisbaai, in accordance with the Cape Agulhas Municipal Spatial Development Framework (MSDF). Its positioning within the designated urban footprint prevents urban sprawl and ribbon development, ensuring that growth occurs in a compact, sustainable, and coordinated manner.

The development has been carefully planned to take cognisance of environmental sensitivities and applicable regulatory requirements. Sensitive ecological areas have been identified and excluded from development, with the open space system and stormwater design supporting biodiversity conservation and landscape integrity. The proposal therefore aligns with the PSDF's objective to safeguard spatial assets and promote resilience in both natural and built environments.

The Spatial Vision

The PSDF builds on One Cape 2040's vision of "a highly skilled, innovation driven, resource efficient, connected, high opportunity and collaborative society". For each of these societal attributes aspired to OneCape 2040 identifies thematic 'big step' changes that need to take place.

The PSDF envisages the spatial expression of these themes as follows:

I. Educating Cape: everyone has access to a good education, and the cities, towns and rural villages are places of innovation and learning.

II. Working Cape: there are livelihood prospects available to urban and rural residents, and opportunities for them to find employment and develop enterprises in these markets.

III. Green Cape: all households can access basic services that are delivered resource efficiently, residents use land and finite resources prudently and safeguard their ecosystems.

IV. Connecting Cape: urban and rural communities are inclusive, integrated, connected and collaborate.

V. Living Cape: living and working environments are healthy, safe, enabling and accessible, and all have access to the region's unique lifestyle offering.

VI. Leading Cape: urban and rural areas are effectively managed

The proposed development in question will provide investment in the area, job creation in both the construction and operational phase, as well as skills transfer to unskilled and semi-skilled employees. The development has been planned around environmental parameters on site and takes cognisance of coastal planning processes and restrictions. The development also makes specific provision for continued coastal access to the public. The development allows for improved use and management of the site and addresses concerns around erosion, litter, alien vegetation etc.

Spatial Implications

i. The Western Cape's biological diversity underpins livelihoods, the Province's economy and the provision of ecosystem services (e.g. water purification, crop pollination). Spatial continuity and connectivity of the biodiversity network strengthen its resilience. The Table Mountain Fund have sponsored the delineation of draft Priority Climate Change Adaption Corridors which link lowlands and uplands, focusing on climate refuges which are more resilient or provide linkages (e.g. along rivers, south-facing slopes, south-facing coastal areas and kloofs).
ii. Towards securing fragmented natural habitats, it is necessary to prevent further intrusion of agricultural activity or urban expansion into key Critical Biodiversity Areas and Ecological Support Areas.

The development proposal aligns with the above by ensuring that natural coastal connectivity is retained and ensuring natural buffers between infrastructure on the site itself. The development proposal is also located within the built-up urban edge and therefore prevents fragmentation of natural habitats.

Developing Integrated and Sustainable Settlements

The Provincial Settlement Agenda is holistic and covers five interrelated spatial themes, namely, settlement morphology and sense of place, access, land use and density, facilities and social services, and informality and housing As a Transversal Instrument the PSDF embraces the concept of sustainable and integrated human settlements.

The PSDF addresses the full spectrum of Western Cape Settlements, irrespective of their size (i.e. from Metropolitan Cape Town to the smallest hamlets), functional role (from diversified urban economies to subsistence rural villages), levels of service, or physical characteristics.

Settlement policy objectives

The Provincial Settlement Policy objectives are to:

1. Protect and enhance sense of place and settlement patterns

2. Improve accessibility at all scales

3. Promote an appropriate land use mix and density in settlements

4. Ensure effective and equitable social services and facilities

5. Support inclusive and sustainable housing

The protection and enhancement of heritage and cultural resources is a clear Provincial mandate with indirect but strong links to its economic development mandate, especially with respect to skills retention in the knowledge economy.

A strong sense of place and quality environments within settlements, at all scales, is increasingly recognized as an essential dimension of sustainable settlement. This relates to the economic potential associated with tourism, attracting skills into the service and knowledge economy, as well as the wellbeing and dignity of communities of all income groups.

Access to opportunities and services is a keystone to building a strong Regional economy and facilitating equitable access to opportunities and services in a financially sustainable manner.

The provision of sustainable and effective social services requires that these are rationalised, clustered and managed in an integrated manner. The vast distances between settlements in the Western Cape makes this goal challenging and an understanding of Regional and local movement dynamics is essential.

The provision and facilitation of an integrated and multi-modal transport system, as advocated by the NDP and Provincial Land Transport Framework, relies on the appropriate location of mixed-use areas and increased settlement densities to ensure adequate thresholds for sustainable public transport. A compact urban form and built environment also enables inclusivity and diversity of population, housing and social facilities, and acts as a precondition for the efficient and affordable delivery of basic services.

The PSDF promotes an integrated approach to housing delivery through deliberate settlement-level strategies, actions and collaborative arrangements that align housing with transport, land-use, economic and infrastructure decisions within a long-term vision of a more integrated urban future. The development of housing projects on poorly located land will be stopped. OneCape 2040 proposes “sustainably upgrade the built environment to directly respond to community needs through shifting from a focus on housing to one on accessible and integrated service delivery”.

Adherence to Development Principles

The need and desirability of the proposed applications are also measured through the following development principles that are referred to in Section 42 of the Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013) (SPLUMA) and Chapter VI of the Land Use Planning Act, 2014 (Act 3 of 2014) (LUPA):

Spatial Justice

The subdivision and rezoning of the subject property will designate this piece of “uitval” land for development in accordance with the SDF and within the guidelines and mitigation measures of the various specialist studies undertaken.

A 12m wide public footpath to the beach will be developed and maintained and access to the area below the 100-year high water mark (admiralty zone) is free for public use.

Spatial Sustainability

The proposal for the development of the "uitval" piece of land along Marine Drive adheres to the land use planning guidelines and parameters and is supported by all specialists.

This land will be well-managed by the architectural and landscape guidelines to the advantage of the owners (increased value of property), the public (low impact attractive development to increase the overall value of Struisbaai) and the Municipality (additional rate payer revenue).

Efficiency

The subdivision of the subject property from the remainder of the farm will ensure that Portion A can be developed optimally.

The development of the "uitval" piece of land will optimize the use of a vacant property that has proven to be developable within all guidelines, requirements, rules and regulations supported by independent development specialists.

Spatial Resilience

The development of the subject property will be subject to the Environmental Management Programme and Land Use Conditions of Approval.

This will ensure sustainable livelihoods in the Struisbaai community with minimal impact on the environment.

Good administration

The municipal legislation, appropriate guidelines and policies will guide the future development of these portions, with the input of all role players.

4.2	The Integrated Development Plan of the local municipality.

Extract from the Cape Agulhas Municipality Final Integrated Development Plan amendments 2022/23 -2026/27:

Population and households

Population and household growth

Bredasdorp, located in the Cape Agulhas area, serves as the Overberg District's Administrative Centre. Despite the District's considerable population of 9 446 in 2022, the Cape Agulhas area registers the lowest population within the region. Moreover, the average population growth in this area remains modest, with annual growth of merely 1.3 % expected between 2022 and 2027.

Gender, age and race dynamics

A closer look at the gender makeup of Cape Agulhas reveals marginally greater representation of females compared to males. At the same time, the age distribution reveals a higher proportion of people in the working-age category, along with slightly smaller groups of children and the elderly compared to the broader district. The

relatively high and growing working age population also results in a decrease in the dependency ratio, dropping from 44 in 2023 to 43 in 2024. Examining the racial composition of the population provides valuable insights. It underscores the significance of inclusive policies and social unity in the pursuit of a more equitable society. Within Cape Agulhas, it is evident that the population is primarily composed of coloured persons (60.9 %), followed by significant percentages of white (23.4 %) and Black African (12.6 %) populations.

Level of urbanisation

Urbanisation reflects a Country or Region's economic and social transformation, with people moving to cities in search of better opportunities. Between 2001 and 2021, Cape Agulhas witnessed a gradual increase in urbanisation, with the urban population rising from 79.6 % to 81.7 %. Bredasdorp emerged as the largest urban settlement, followed by Struisbaai, Napier, Elim, Aniston, and Agulhas. Notably, the most considerable urban growth in the region was experienced by Struisbaai, while Bredasdorp, despite maintaining its population level, saw a decline in its proportion of urban residents.

While urbanisation presents economic potential and improved living conditions for many, it also poses challenges related to inequality, infrastructure development, and governance that require careful attention and planning.

The proposed development allows for investment in the Struisbaai area and provision of both short- and long-term job opportunities for varied skills levels in the population.

Population density

In the context of the Overberg Region, the overarching population density is recorded at 26 individuals per square kilometre. However, there is a substantial variance in population densities among different local areas within the region. As a quantitative measure used to assess the concentration of residents within a specific geographical area, it plays a pivotal role in understanding the degree of population crowding or dispersion. Overstrand, characterised by rapid population growth, registers the highest population density at 66 people per square kilometre, while Theewaterskloof, the most populous region in the district, maintains a comparatively moderate population density of 39.

The Cape Agulhas and Swellendam areas exhibit notably lower densities of 10 individuals per square kilometre, which holds its own significant relevance in urban planning and resource allocation. It is worth noting that low population density areas are likely to have higher per-person cost for social and economic infrastructure. However, it also offers opportunities for a more relaxed lifestyle, which some individuals and families find appealing.

Given the population growth and trend to move to these areas, the proposal offers investment in the area and job creation, as well as infill development within the built-up urban area.

Basic services

Housing and household services

Among the 16 220 households residing in the Cape Agulhas area, a noteworthy 94.4 % enjoyed access to formal housing, surpassing the rate observed in the broader Overberg District, which stood at 87.5 %. Furthermore, the municipal area demonstrated a lower incidence of informal dwellings, accounting for only 5.2 % of the total, in contrast to the district's higher prevalence of 11.5 %.

Intriguingly, the Cape Agulhas area exhibited notably greater service access levels compared to formal housing access, with striking statistics such as access to piped water within the dwelling or yard, which reached an impressive 99.9 %. Access to flush or chemical toilets was prevalent among 98.8 per cent of households, access to electricity for lighting was accessible to 99.3 % of households, and the regular removal of refuse by local authorities occurred in 92.8 % of households. These service access levels clearly outperformed the corresponding figures for the district.

These findings suggest that the Cape Agulhas area demonstrates a better state of housing provision and service accessibility, indicating a more favourable living environment for its residents compared to the broader Overberg District. This could have positive repercussions on the overall quality of life, economic opportunities, and public well-being within the Cape Agulhas area.

A key driver of the above provision of services and overall performance of the region can be attributed to availability of employment and investment in these areas, without development, opportunities for improvement is not possible.

Free basic services

In the context of free basic services, municipalities offer a suite of essential services to households facing financial vulnerability and challenges in affording such services. In the Cape Agulhas area, the number of households receiving these free basic services, categorized as indigent households, experienced a notable upswing between the years 2019 and 2021. The prevailing adverse economic conditions exerted additional pressure on household incomes, thereby likely amplifying the demand for free basic services. The reduction in the count of indigent households to 3 568 in 2022 is indicative of a certain degree of economic easing.

Adverse economic conditions can only be improved with improved opportunities and access to investment and jobs.

Access to basic services

Basic services are a package of services necessary for human well-being and typically include water, sanitation, and electricity and refuse removal.

The municipality provides basic services at the prescribed level to all urban households within its area of jurisdiction.

For each of these services there is a range of service levels which can be provided with the following categories typically being applied:

- → Basic service level which is required to maintain basic health and safety.
- → Intermediate service level.
- → Full service, the highest level of service that is traditionally applied in South African municipalities.

Municipalities have the discretion to provide services at higher levels than those stated, and the municipality strives to do so through the ongoing provision, refurbishment and maintenance of its bulk and service infrastructure. This enables us to render quality services to our clients and create an environment that will attract development opportunities that will impact positively on the local economy.

(a) Water

The Municipality's primary water source is ground water, from various boreholes in the area. Bredasdorp has, in addition, access to the Uitvlucht Spring and the Sanddrift Dam for water.

All towns have sufficient water sources except for Struisbaai, which is under ever-increasing pressure owing to numerous residential developments. Various water purification works are operational throughout the Municipal area, have adequate capacity, and operate at a satisfactory level.

The provision of water for the project has been confirmed and will be supplemented by boreholes located offsite.

(b) Sanitation

Areas are serviced by communal toilets, generally exceeding the minimum norm of a communal toilet per five families. Excluding Bredasdorp and Napier, Wastewater Treatment Works (WWTW) in CAM have sufficient capacity and are operating at a satisfactory level. An effluent quality control program is in place to reduce the risk of pollution of public streams or ground water sources.

Bredasdorp has a full waterborne sewerage system in place. The lower-income areas in Napier, Arniston and Struisbaai also have full waterborne sewerage systems, whilst the higher income areas of these towns are serviced with conservancy tanks. Conservancy tanks are not deemed a backlog, and the service is adequate except for the Struisbaai CBD, where the tanker services are under immense pressure during the summer tourist season and are limiting potential development. A full-service provision report has been conducted for the proposal and has confirmed sufficient capacity exists to service the proposed development.

(c) Electricity

Electricity distribution in the Municipal area is shared by CAM and Eskom, which services Struisbaai North, Elim, Kassiesbaai, Protem and Klipdale.

All formal households and households in informal settlements have access to electricity and street lighting. Informal settlements where some type of township development has taken place also have access to electricity.

Electricity capacity is adequate to cover the current demand for electricity in the area. All households within the Municipal Supply Area have access to minimum electricity standards, defined as an electricity connection at the dwelling.

Gross Domestic Product Regional (GDPR) Performance

The Cape Agulhas municipal area economy was valued at R3.8 billion in 2021. This economic influence translates into 144 employed people, accounting for 12 % of the Overberg District's employment, increasing to 15186 in 2022. While employment may still be recovering from the 2020 downturn, the estimated 2.4 % growth in GDPR during 2022 has ushered in a complete economic resurgence, with GDPR levels growing slightly beyond those registered in 2019. The finance sector (contributing 1.1 percentage points), transport sector (contributing 1.0 percentage points), and trade sector (contributing 0.5 percentage points) have emerged as the primary drivers behind the robust GDPR performance in 2022.

With a substantial contribution of R920.2 million (24.2 per cent of GDPR), the finance sector is the most significant local economic sector in terms of GDPR. This distinction predominantly arises from Bredasdorp' s role as the epicentre of business services in the municipal area and the bustling property market in Struisbaai and L'Agulhas. Property sales in Struisbaai recorded the most sales in 2022 since the property market boom of 2017/18, with 200 properties sold at an average value of R2.2 million. While slightly fewer properties were sold in L'Agulhas in 2022 compared to 2021, the average property sale price increased from R580 000 to R1.3 million.

Adding to this economic narrative is the Denel Overberg Test Group, stationed in Arniston, which offers distinctive business services through in-flight testing of advanced guided and aviation systems for the local and international aerospace industry.

The trade sector was boosted by a return of tourists to the area, with a steady uptick of visitors at local attractions such as Agulhas National Park, Cape Agulhas Lighthouse and the Shipwreck Museum. However, visitor numbers have not yet fully recovered, with the visitor recovery compared with 2019 being 67.2 per cent at the Agulhas National Park, 64.0 per cent at the Cape Agulhas Lighthouse and 48.3 per cent at the Shipwreck Museum. Further growth is likely to be slow amid South African households' economic challenges, such as rising fuel prices, high inflation and high interest rates, which affects their likelihood and ability to travel. Despite the strong growth from the transport (11.4 per cent) and trade (2.7 per cent) sectors estimated for 2022, these sectors are yet to fully recover from the impact of the COVID-19 pandemic. Other sectors lagging behind their 2019 performance include mining, manufacturing, utilities, construction, trade and government services. Planned developments such as the shopping centre in Struisbaai, Langevlei Village residential estate, and Sea Cottage Estate in Struisbaai, together with planned capital infrastructure spend of R59.9 million, R52.2 million and R63.3 million over the MTREF period by the Local Municipality, will be essential in revitalizing the local construction industry. The proposed development at hand has potential to have a significant and positive impact in the development and construction sector.

GDPR Forecast

For 2023, the economy is poised for a muted expansion of merely 0.3 %, primarily propelled by lacklustre growth within the general government and agriculture sectors. In contrast, if energy security can be secured, the finance, trade, and manufacturing sectors loom as pivotal sources of robust growth. Looking forward to 2024, a more pronounced economic uptick of 1.0 per cent is forecasted. The construction sector is expected to rouse from dormancy in the wake of increased public sector spending and local property developments. In contrast, the trade and transport sectors are anticipated to extend their upward trajectory, further accentuating the path of economic progression. The proposed development is in line with this forecast.

4.3.	The Spatial Development Framework of the local municipality.

Struisbaai Spatial Development Framework 2022 – 2027

The Spatial Development Framework for Struisbaai 2022-2027 shows the new urban edge and proposed developments.

The "uitval" piece of R/Farm 281 is located within the urban edge and therefore earmarked for urban development.

The Struisbaai Spatial Development Proposals Plan shows "public space upgrade" all along the beach/seashore.

The application site is, however, private owned, but will also make provision for adequate access to the beach / sea by means of a formal 12m wide public landscaped footpath to the beach.

The Struisbaai Environmental Protection and Heritage Plan show the following that have an impact on the application site:

→ Short (high risk zone), medium (medium risk zone) and long term (low risk zone) flood lines,

→ high water mark 1 in 10 years

→ 100m buffer

→ 5m contour

These are all indicated and considered in the proposed SDP. All erf boundaries are located outside these constraint lines, except one single residential erf that has a marginal area of low-risk zone at the bottom of its proposed erf boundary.

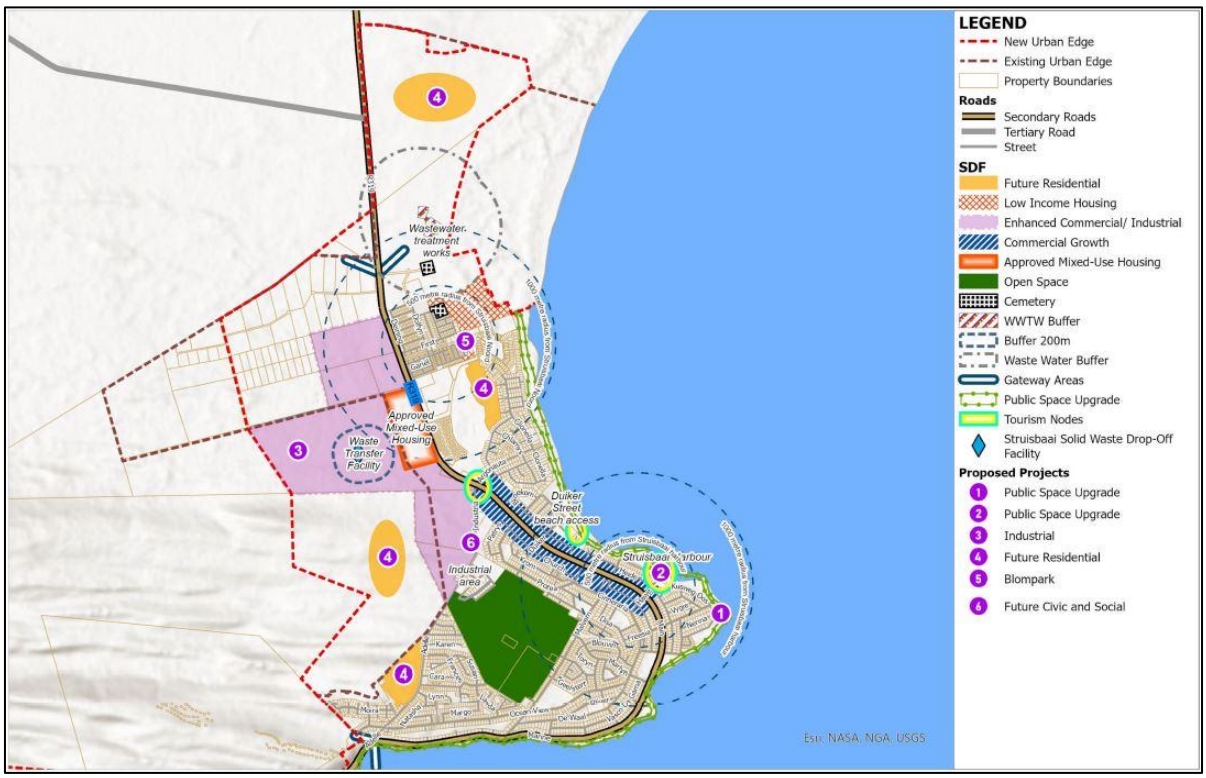


Figure 9: The proposed development site is situated within urban edge as demarcated by Cape Agulhas Municipality SDF (2024-2025).

4.4.	The Environmental Management Framework applicable to the area.

No EMF in place.

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

Integrated Coastal Management Act (ICMA) and Coastal Sensitivity

The Department of Environmental Affairs and Development Planning: Coastal Management (DEA&DP: CMU) and Cape Nature highlighted that the property falls within the Coastal Protection Zone (CPZ) and partly seaward of the Coastal Management Line. These authorities emphasized the need to comply with the NEM: Integrated Coastal Management Act (Act 24 of 2008), particularly Sections 7A, 13, 14 and 18, relating to coastal public property, storm surges, risk avoidance and historical public access.

In response, the preferred layout (Alternative 5) evolved during the impact assessment process, which now includes the reclassification of the development from Single Residential erven to Medium Density Residential

zoning classification. This change allows for a more compact development form, thereby reducing the overall footprint. This particular zoning also allows for the relaxation of the rear building line of each proposed erf, meaning that the Alternative 5 layout sees dwellings shifted 3 m back (inland) on each proposed erf increasing the setback distance from the high-water mark. It is important to note that the positioning of the housing units cannot be shifted any further inland than shown in the current preferred layout, as the area between the northern boundary of the subject property 281 and the Marine Drive Roads is designated as the road reserve and therefore does not form part of the development area.

The entire area below the High-Water Mark remains Admiralty zone, ensuring compliance with the provisions of the National Environmental Management: Integrated Coastal Management Act (NEM: ICMA) and the principles therein. The revised layout also includes a formalised public pedestrian access pathway (Erf 7), which provides continuous and equitable access to the coastline while maintaining the integrity of coastal processes and natural habitats.

Terrestrial Biodiversity and Faunal Sensitivity

Cape Nature's review of the Terrestrial Biodiversity Impact Assessment identified the need for clarification regarding the presence of Agulhas Limestone Fynbos and the compliance with National Protocols for the Animal Species Theme.

The Botanical Specialist study was updated to align with the 2024 Western Cape Biodiversity Spatial Plan (BSP), confirming that the vegetation occurring within the proposed development footprint is primarily associated with the Southwestern Strandveld vegetation type. The specialist further identified the western section of the property as supporting Agulhas Limestone Fynbos, which is considered to have a medium ecological sensitivity, while the eastern portion of the site where the main components of the proposed development are located, was classified as having a low ecological sensitivity. In response to these findings, the revised layout (Alternative 5) was refined and excludes development within the more sensitive western end of the site. A formal pedestrian access route is proposed along a previously disturbed section that currently accommodates informal access pathway. As this walkway will utilise an already degraded area, no additional vegetation clearance will be required for its construction.

A Terrestrial Animal Species Report was compiled in response to recommendations made by Cape Nature during the initial round of public participation. The assessment verified the absence of faunal species of conservation concern within the proposed development footprint and recommended the implementation of seasonal mitigation measures during construction to minimise disturbance to coastal bird species, notably the African Black Oystercatcher (*Haematopus moquini*).

Field surveys and desktop analysis confirm that no animal Species of Conservation Concern (SCC) are likely to be significantly impacted by the proposed development, although the surrounding coastal environment supports important habitats for species such as the African Black Oystercatcher (*Haematopus moquini*) and several mammal and bird species. The faunal specialist concluded that the development footprint does not overlap with critical breeding or foraging sites, and suitable habitat within the site is limited. As a result, the residual impact on terrestrial biodiversity was reduced to low significance and no biodiversity offset was deemed necessary.

Climate Change and Sea level rise

SANParks and DEA&DP emphasised the need to consider long-term coastal processes, including climate change, storm surges, and sea-level rise, within the site design. These comments prompted a re-evaluation of the site layout and engineering design.

The updated Alternative 5 layout through the amended proposed zoning, applies for the relaxation of the rear building line for each proposed erf which allows for the each dwelling to be shifted as far back on the property as possible. The property is located on a rocky shoreline and dwellings will be placed above the 5 m contour, further reducing risk of impact from storm surges and sea level rise.

Public Interest and Coastal Access

During the previous round of public participation, concerns were raised regarding loss of public access to the beach and potential privatisation of coastal land. In response, the development proposal was amended to designate and improve public access through the formalisation of the public access path on the western end of the site which links Marine Drive to the shoreline. The development will not limit access to the coast, and the general public will still be able to access the coast on the western end of the site (Erf 7), along the shoreline in front of the houses, along the eastern boundary of the site and along Marine Drive and the Road Reserve. The only change in access, is that the public will not be able to traverse through the middle and eastern end of the site to reach the coast.

The large open space erf, which was previously designated as private open space (Erf 8), has been reclassified as part of the Admiralty Zone, ensuring that the coastline remains publicly accessible to local residents, fishermen, and visitors. In addition, a larger open space area has been incorporated on the western portion of the property to enhance the availability of recreational and ecological space. The Admiralty Zone, located below the High-Water Mark (HWM) as illustrated in the Site Development Plan, will remain undeveloped and continue to function as a public coastal property, ensuring continued public access along the beachfront. Access to and through the Admiralty Zone will not be restricted, allowing residents and visitors to move freely along the coastal edge in accordance with coastal management principles.

On the southern boundary of the residential erven, walls and fencing will be limited, and if required, ClearVu type fencing will be utilised. In cases where no fences are erected, the property owner will protect their property through the installation of security alarms and beams. This approach retains visual connectivity and minimises disturbance to the natural coastal character.

Summary and Conclusions

Input received from biodiversity authorities and conservation organisations, including Cape Nature, SANParks, DEA&DP's Coastal Management Unit (CMU), and Whale Coast Conservation (WCC), had a direct influence on the evolution of the proposed Spookdraai Residential Development layout alternatives. Collectively, their comments emphasised the ecological and coastal sensitivity of the site, the need to comply with the National Environmental Management: Integrated Coastal Management Act (NEM: ICMA), and the importance of maintaining public access and ecosystem integrity within the coastal protection zone.

The updated Terrestrial Biodiversity Impact Assessment (2024) confirmed that the vegetation within the development footprint is predominantly Southwestern Strandveld, with the western section, comprising Agulhas Limestone Fynbos. A formalised pedestrian walkway will utilise an already disturbed area to provide public

access without further vegetation loss. These revisions, together with the inclusion of greening, landscape buffers, and permeable fencing, address concerns regarding biodiversity conservation, coastal ecosystem functioning, and visual integration. The final layout (Alternative 5) thus reflects a precautionary, ecologically responsive, and sustainable design, consistent with the Western Cape Biodiversity Spatial Plan (2024), ICMA, and the National Environmental Management Act (NEMA) principles.

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

The Western Cape Biodiversity Spatial Plan (WCBSP, 2017) was initially utilised, as both the project and the specialist Botanical assessment were commissioned prior to the release of the updated 2023 WCBSP. According to the 2017 WCBSP, the western portion of the site was mapped as an Ecological Support Area 1 (ESA1) due to the presence of Agulhas Limestone Fynbos, which is believed to occur in a small area on limestone outcrops at the western end of the property. The eastern portion was mapped as Other Natural Areas (ONA), while the remainder of the site was unclassified, where most Southwestern Strandveld vegetation type was identified. This distinction informed the design of the development layout (Alternative 5), which was refined to largely avoid the ESA1 area and instead utilise the lower sensitivity areas mapped as ONA and unclassified portions in the eastern section.

The updated WCBSP (2023) was subsequently consulted and overlaid onto the site to obtain the most current spatial information on biodiversity priority areas (CBA and ESA). As highlighted in the updated Terrestrial Biodiversity Impact Assessment, the site is now classified primarily as Critical Biodiversity Area 1 (CBA1) attributed to the presence of Southwestern Strandveld (formerly Overberg Dune Strandveld) and partly as ESA1, while the remainder of the site is not recognised as sensitive.

Figure 9a: Map showing areas mapped as ESA and ONA in the property. Source; (Cape Farm Mapper)

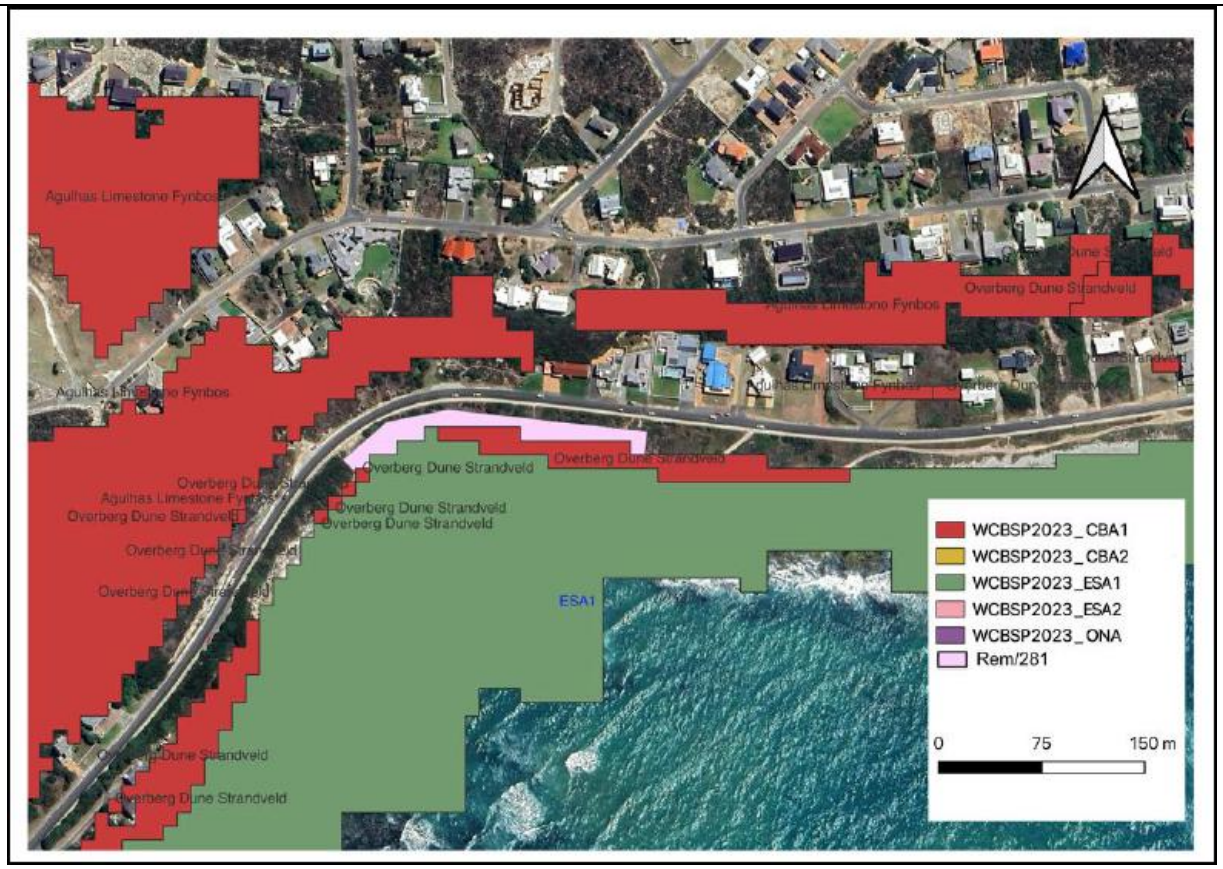


Figure 9b: The WCBSP map (CapeNature, 2023) overlaid on a Google Earth Pro ™ image, indicating that the western part of the site is classified as ESA1 (green shading) and the central and east parts of the site on the seaward side are classified as CBA1 (red shading). The rest of the site is classified as not sensitive at all (pink shading). *Source;* (McDonald, 2025).

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

The proposed development is located within the Coastal Protection Zone (CPZ) as defined in Section 16 of the National Environmental Management: Integrated Coastal Management Act, 2008 (ICMA). Although the property lies seaward of the Overberg District Coastal Management Line (CML), it remains situated within the established urban edge of Struisbaai, as delineated in the Cape Agulhas Spatial Development Framework (2022–2027). The CPZ was established to ensure that land adjacent to Coastal Public Property (CPP), or land that plays a significant role in coastal ecosystem functioning, is managed, regulated, or restricted in a manner that protects the ecological integrity, natural character, and socio-economic value of the coastal environment, while reducing the risks associated with dynamic coastal processes such as erosion and sea-level rise.

The proposed development is consistent with the purpose and objectives of the CPZ as set out in Section 17 of the ICMA. The development footprint does not encroachment into the littoral active zone and areas of high coastal risk. All proposed erven are located landward of the delineated low-risk zone, above the 1:10-year high-water mark, and above the 5-metre contour line. The revised layout (Alternative 5) ensures that no portion of the proposed development extends below the High-Water Mark (HWM) of the sea. The area seaward of the development footprint remains Admiralty Zone. The evolution of Alternative 5 included specific consideration relating to public coastal access and concerns regarding privatisation of CPP. As such, intentional changes were made to the layout to reduce the “gated” areas of the development and to formalise and retain public access to the shoreline and Spookdraai Beach area. Through these considerations, Alternative 5 ensures not only ecological and visual quality of the coastal environment, but also maintains continuous public access along the

shoreline, thereby supporting the intent of the Integrated Coastal Management Act (ICMA) to ensure reasonable access to coastal public property while protecting its natural character and function.

In terms of Section 13 of the ICMA, the proposed development preserves public access to the coastline. A formal 12-metre-wide public pedestrian access route is incorporated through the designated open space area, providing a safe and well-defined connection to the coastal public property. This aims to prevent restriction of historical access and provide the general public with continuous access to the shore while development some of the site.

In terms of planning for coastal development at the site, recent storm and flooding events experienced in 2023 provided valuable insights into the resilience of the property. Observations and photographic evidence demonstrate that water levels during these events did not significantly affect the site. There were no documented signs of coastal erosion or sand movement, indicating the stability of the rocky shoreline. The dynamic nature of the littoral active zone, characterized by the adjacent rocky coastline, has proven to be resilient to high seas and storm events experienced on this site. The site does not include mobile sand or coastal dunes, further reducing potential risks associated with unpredictable coastal dynamics.

Photos taken on the site during the 2023 storm event confirm no signs of seawater inundation, flooding or erosion impacts were documents for the site:

Flood debris and silt were deposited shortly after the flooding, but no property damage was recorded.

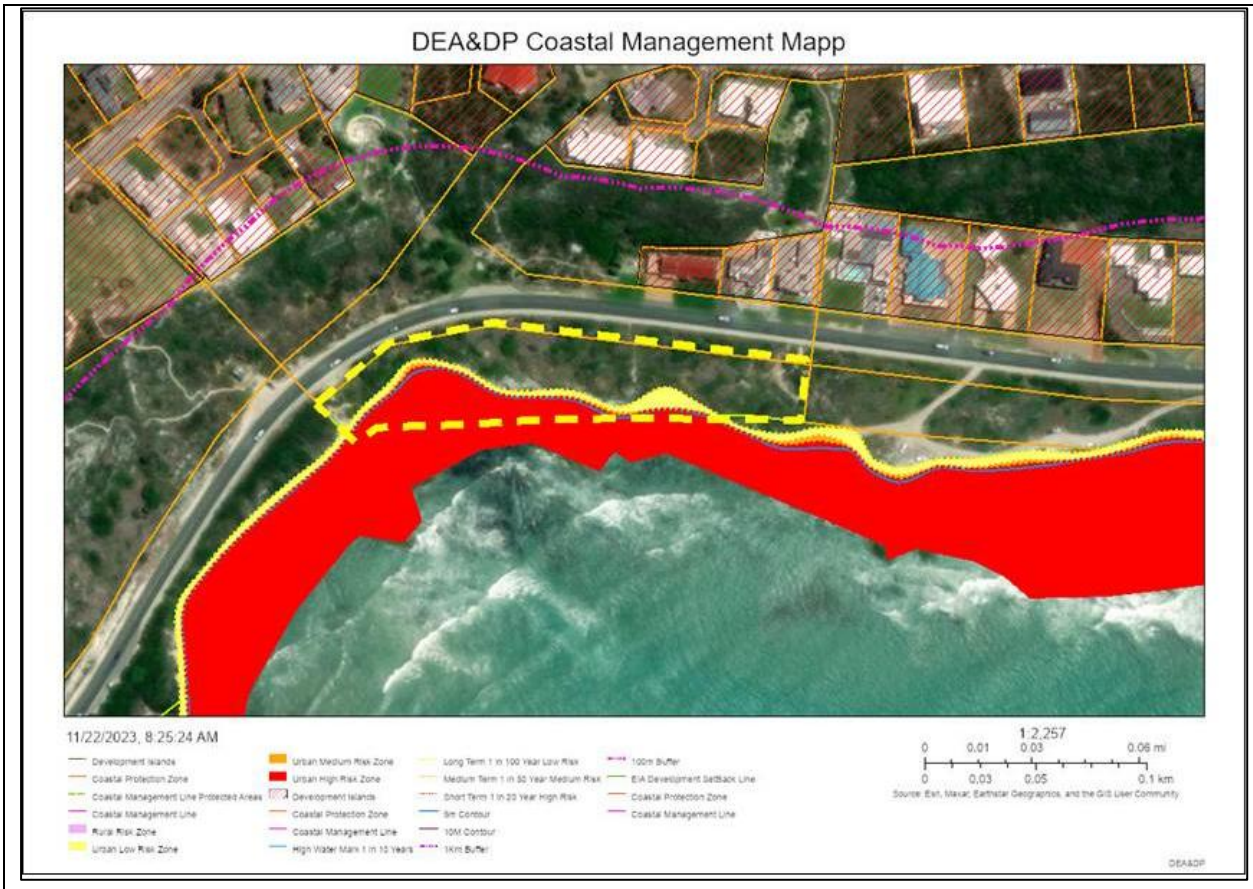


Figure 10: Coastal Management GIS Mapping results for the subject property

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

The Screening Report remains the same as the one submitted with the NOI.

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

The proposed development will utilise the vacant coastal property for the establishment of the Spookdraai residential development. This property is located within the demarcated and built-up urban edge of Struisbaai as confirmed by the Cape Agulhas Municipality. Development of the site will contribute to infill development rather than urban sprawl.

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

The proposed development is situated within the established urban area of Struisbaai, where connection to services and infrastructure are readily available. Municipal water connections in the vicinity will be utilised to supply the development, avoiding the need for new water infrastructure. The development will also leverage the existing road network, with Marine Drive providing direct access to the internal road of the proposed development.

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

The Cape Agulhas Municipality have confirmed that there is sufficient service capacity for the proposed development – See **Appendix G9a**.

Bulk Services

Water

There is an existing 100mm municipal watermain located on the northern side of Marine Drive (MR261). The proposed development would be required to link to this existing watermain and to provide a bulk water meter for the Cape Agulhas Municipalities metering purposes. The ground level heights of the proposed development will not provide any low water pressure problems, as it is situated directly below the Struisbaai municipal water reservoirs, and the existing level difference is approximately 54m. With the water shortages previously experienced in the Western Cape and the possibility of this shortage occurring again in the future, water saving and harvesting measures must be investigated and implemented for the proposed development.

Sewer

The existing municipal sewer infrastructure along Marine Drive (MR261) currently comprises of septic tanks and conservancy tanks. No municipal gravity pipeline system currently exists. The proposed development will be required to operate off a gravity sewer system that is linked to a conservancy tank for the municipality to extract the sewerage with a tanker system. If the municipality installs a bulk gravity sewer system, the conservancy tank could be converted to a sewer pump station, and the sewerage could be pumped to the municipal gravity sewer system.

Roads

The proposed development is adequately serviced by Marine Drive (Provincial Main Road MR261). The access to the proposed development will be taken from an access road off Marine Drive (Provincial Main Road MR261). The new road access will be designed to allow sufficient entry and exit lanes to the various areas of the proposed development.

Stormwater

No municipal stormwater management system exists on Marine Drive (MR261) but an existing municipal stormwater outlet exists at the eastern boundary of the proposed development. This municipal stormwater system is an outlet for the residential developments to the north of Marine Drive and exits between erven 1995 and 1003. It must be noted that this stormwater system drains onto the proposed development and would need to be redirected around the proposed development as it is currently causing erosion across the proposed SR Erf 1. The stormwater flow from the proposed development will be accommodated on the proposed development. The major system will be accommodated within the road reserve area and will be based on the 100-year storm event and the piped underground stormwater system will be designed to accommodate the 2-year storm event. The attenuation volume will be based on the post-development flow less the pre-development flow. In this manner, erosion and stormwater damage can be minimised and the existing ground water system can be recharged. All erf and road levels within the proposed development will be shaped to create the necessary falls towards the proposed stormwater system. The stormwater system from the proposed development will exit to the sea, but will be managed through a stormwater dissipation, silt and debris trap to prevent any contamination at the coast, with reno-mattresses at the overflow, to prevent any erosion. The same structure will be used at the

realignment of the existing municipal stormwater system. These stormwater structures will be set back far enough to not be affected or affect the tidal conditions along the coast. The maximum pipe size to be provided at the proposed development will be 450mm (0.45 m) diameter.

NOTE: The pipeline is less than 1000m in length.

Solid Waste

The refuse from the development will be collected by the Cape Agulhas Municipality. There will be refuse bins provided at each proposed residential unit, which will be taken weekly to the proposed on-site refuse room, which is situated close to the entrance of the proposed development. An adequate turning facility will be provided at the refuse room for the municipal refuse trucks.

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

In accordance with the Department of Environmental Affairs' Integrated Environmental Management Guideline on Need and Desirability, as articulated in the EIA Regulation, 2014 (as amended), the proposed Spookdraai Residential Development meets the criteria for Need and Desirability in several critical aspects:

- → According to the SDF "Struisbaai is the largest coastal settlement in CAM and is a sought-after retirement town and holiday destination.
- → Due to the explosive growth in population in Struisbaai, various additional areas have been identified and earmarked for residential and industrial growth during a comprehensive public participation process. This process resulted in the newly adopted and expanded urban edge.
- → This application will ensure that the areas earmarked for urban expansion be subdivided from the remaining farm that falls outside the urban edge.
- → The application adheres to the objective of the SDF, i.e. to designate land where future subdivision and development rights are granted in terms of the Land Use By-Law and LUPA.
- → The large portion will be developed according to the concept Masterplan that is in the process of being compiled for the area, taking into account the availability of infrastructure services in collaboration with other developers in Struisbaai.

The subdivision of the marginal Subdivisional area into 6 group houses can be regarded as desirable as follows:

- → It is privately owned vacant developable land;
- → Located above the high-water mark and the short-, medium- and long-term flood lines (Erf 3 has a small area within the long term / low risk zone, but this will not be built upon);
- → Buffers (25m wide Marine Drive, agricultural land and open spaces) between application site and other developments;
- → Only three residential properties directly adjacent / above, with a ±9m difference in level;
- → Very accessible;
- → Safe access to the property as confirmed by the Traffic Impact Assessment specialist;
- → Although it will cause of marginal loss of vegetation on the eastern side of the development, the small scale is regarded as low impact;
- → Flat roofs of dwellings will be planted with vegetation;
- → Strict prescriptive materials and forms and colours to be used;

- → The visual impact assessment supports the development subject to the building of the six dwellings according to the prescribed architectural and landscape guidelines;
- → Infrastructure services are available and the development can be included in the existing municipal network; and
- → The existing storm water flowing from the higher area to this site will be managed together with the storm water of the application site to ensure cleaner effluent management into the sea.
- → It is the conclusion of the Visual Specialist that the six dwelling units built according to the prescribed architectural and landscape guidelines, have the potential to add to the attractions of Struisbaai, increasing the overall value of this town.

SECTION F: PUBLIC PARTICIPATION

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

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

N/A

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

See Appendix F for the Proof of Public Participation document. Public Participation was conducted in line with the requirements of the NEMA and NHRA.

- → Out of process public participation was conducted from the 31 January 2025 to 05 March 2025
- → All directly adjacent landowners and applicable organs of state were notified via email, registered mail or other preferred means.
- → A noticeboard was placed on the western end of the site
- → An advertisement was placed in the local newspaper, Suidernuus, on the 31 January 2025.
- → A thirty-day public participation period was provided
- → All comments received were recorded
- → A Register for Interested and Affected Parties (I&AP's) was opened
- → A total of 1068 I&APs have been registered.
- → A separate Summary of Comments was produced for comments and concerns raised by Interested and Affected Parties and Organs of State – See **Appendix F.**

In terms of the NEMA, an additional In Process Public Participation Process needs to be provided to all Registered Interested and Affected Parties. The In Process Public Participation 2 was undertaken in November 2025, as follows:

- → All Registered Interested and Affected Parties were notified of their commenting opportunity

→ In addition, and beyond required process, and additional Newspaper Advertisement was placed in the Suidernuus to ensure that all parties are sufficiently consulted and to inform the general public of the availability of the hard copies.

→ A hardcopy of the Rev 2 Basic Assessment Report was placed in the Cape Agulhas Municpality Satellite Office in Struisbaai

→ A 30-day Public Participation Process was provided.

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

DEADP: Land Use Management
DEADP: Coastal Management Unit
Cape Nature
Cape Agulhas Municipality
Overberg District Municipality
Department of Agriculture
SANParks
Cape Agulhas Heritage Society
Whale Coast Conservation

Note: Department of Infrastructure: Road Planning, have also been consulted regarding the proposed access of Provincial Road MR 261, over the road reserve to the development site.

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

N/A

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

All comments were received and recorded as required.

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

PUBLIC PARTICIPATION PROCESS 1	
CAPE NATURE	
Comment	**Response**
Cape Nature noted that Section 6.1 of the report indicates that no Limestone Fynbos occurs on the site, although it is present further inland. However, other sections of the report refer to the presence of Agulhas Limestone Fynbos on the property. CapeNature therefore requested clarification on whether this vegetation type does, in fact, occur within the site boundaries. It was further noted that the waypoint descriptions provided do not identify any localities characteristic of Limestone Fynbos.	Refer to the updated Terrestrial Biodiversity Impact Assessment.

It was noted that the Botanical Impact Assessment references the 2017 Biodiversity Spatial Plan (BSP), which was accurate at the time the report was compiled. The relevant BSP version applicable to the assessment is determined by the date on which the application was initiated. However, Cape Nature advised that both the 2017 and the most recent versions of the BSP may be referred to for the purpose of informing the application.	Refer to updated Terrestrial Biodiversity Impact Assessment refers to both 2017 and 2023 BSP.
Cape Nature noted that no plant species of conservation concern (SCCs) were observed on the site. The vegetation sensitivity is therefore confirmed as low, except for the small section in the western portion of the property which is classified as medium due to its association with the mapped Agulhas Limestone Fynbos. With regard to this latter area, Cape Nature referred to the above discussion concerning the confirmation of the presence (or absence) of Limestone Fynbos on the site.	Refer to the updated Terrestrial Biodiversity Impact Assessment.
Cape Nature observed that the impact assessment for the two non-preferred development layouts is rated as high prior to mitigation, with both the residual impact and the impact after mitigation also rated as high. In contrast, the assessment for the preferred development layout—which avoids the western section containing mapped Agulhas Limestone Fynbos—is rated as high prior to mitigation, with a residual impact of medium and an impact after mitigation rated as low. Cape Nature noted that the term residual impact is defined within the context of the mitigation hierarchy established under the National Environmental Management Act (Act 108 of 1998) and further elaborated in the National Biodiversity Offset Guidelines. The residual impact refers to the impact that remains after the application of the mitigation hierarchy, namely avoidance, minimisation, and then mitigation or rehabilitation. Therefore, the residual impact should correspond to the impact after mitigation.	The Terrestrial Biodiversity Impact assessment has been updated. The layout has evolved and the new alternative layout (Alternative 5) is confirmed as have a low residual impacts
Cape Nature requested clarification regarding the residual impact associated with the preferred development layout. It was noted that Section 9.4 of the report indicates that it is not possible to mitigate the identified impacts. CapeNature therefore queried how the impact significance could be reduced following mitigation if no mitigation measures are feasible. In accordance with the National Biodiversity Offset Guidelines, a biodiversity offset is required to address any residual impact rated as medium negative or higher. Clarification is therefore required regarding the proposed mitigation measures and the corresponding impact significance.	Refer to the attached updated Terrestrial Impact Assessment Report.
Cape Nature noted that while the botanical assessment included incidental observations of fauna, the report does not adequately address the requirements of the 2020 Animal Species Protocols (GN 1150, GG 43855). The assessment lacks evidence of compliance with the terrestrial animal species theme, as there is no reference to the two species flagged in the screening tool — the Southern Adder (*Bitis armata*) and *Aneuryphymus montanus* — nor to other potential faunal SCCs. It is further unclear whether coastal and estuarine species were considered, particularly given the site's proximity to the coastline. CapeNature highlighted that coastal bird species such as the African Oystercatcher (*Haematopus*	A Terrestrial Animal Species Report was commissioned after the first round of Public Participation – See **Appendix G8.**

moquini) may occur in the area and are sensitive to disturbance during the breeding season, which may necessitate mitigation measures during construction.	
Cape Nature noted that the property is situated seaward of the Overberg District Municipality's coastal management line and not within a designated development island. As coastal management lines are implemented through municipal planning, Cape Nature recommended that the Department of Environmental Affairs and Development Planning (DEA&DP): Coastal Management, as well as the Cape Agulhas Municipality, provide input on this matter.	DEADP:CMU and CAM comments are attached below.
Cape Nature noted that a substantial portion of the proposed large private open space erf lies below the high-water mark and therefore forms part of the coastal public property in terms of the National Environmental Management: Integrated Coastal Management Act (Act 24 of 2008). Cape Nature recommended that the provisions of Sections 7, 7A, 13, 14, and 18 of the Act, relating to coastal public property and coastal access, be considered in the application and that DEA&DP: Coastal Management provide input on this matter.	The new updated layout Alternative 5 refines the open space in line with ICMA requirements and retains the area below the high-water mark as Admiralty Zone. Additionally, the BAR has been amended, and it includes reference to Sections 7A, 13, 14 and 18 of NEM:ICMA.
Cape Nature noted that the proposed development will be connected to municipal and Eskom services for water and electricity, while sewage management will rely on conservancy tanks linked to a central system serviced by the municipality. The authority requested that the locations of the conservancy tanks and the central servicing tank be clearly indicated on the layout, and that adequate mitigation measures be implemented to prevent pollution of the coastal environment. Cape Nature further observed that an existing stormwater outlet has caused gully erosion on the site, affecting the easternmost proposed erf. It was noted that the stormwater is proposed to be redirected westward along the erf boundary, as shown in Figure 3 of the BAR, and that gully infilling may be required to enable development on the affected erf.	Refer to **Appendix G9b** for clear illustration.
Cape Nature noted that while broad principles for stormwater management are provided, the Environmental Management Programme Report states that a stormwater management plan is not required due to the small scale of the project. However, Cape Nature emphasized that existing stormwater entering the site must be addressed prior to development. It was recommended that a detailed stormwater management plan be prepared in collaboration with the municipality, which manages the bulk stormwater flow causing erosion on the site. The infill of the gully should also be addressed and included in the impact assessment.	Refer to **Appendix G9a** of the Civil Engineering Report.
In conclusion, Cape Nature recommended that several matters be addressed before the application can be further considered. These include: the compilation of a stormwater management plan in collaboration with the Cape Agulhas Municipality to address both existing stormwater entering the site and the proposed development, including the existing erosion gully; compliance with NEM:ICMA requirements, such as the coastal management line, coastal public property, and coastal access, with comments from DEA&DP: Coastal Management; clarification in the botanical impact assessment regarding the presence of Agulhas Limestone Fynbos, available mitigation measures, and residual	The BAR and the Specialist Reports have been updated: • Stormwater management onsite is addressed in the Civil Engineering Report under **Appendix G9a**. • The BAR has been updated and incorporates reference to NEM:ICMA. • The Terrestrial Biodiversity Impact Assessment was updated; the western portion will not be impacted by the proposed development. The development will result to low residual impact

impacts after applying the mitigation hierarchy; implementation of a biodiversity offset if residual impacts on terrestrial biodiversity are medium or higher; adequate addressing of animal species, including mitigation measures for disturbance to coastal birds; and proper management of impacts associated with service provision.	and therefore, no biodiversity offset is applicable. • Alternative 5 (preferred) development option will result to low residual impact, therefore, a biodiversity offset report is not required. • The animal species compliance statement has been undertaken and is attached as **Appendix G8.**
SANPARKS	
Comment	**Response**
SANParks noted that the proposed development site is a narrow section of rocky shore with a small beach, making it highly sensitive to disturbance. The development is expected to significantly affect the scenic and natural character of this coastal stretch. Although public access is being provided, the limited spatial extent of this access may increase the overall impact.	The new preferred layout, Alternative 5, now confirms the area below the High-Water Mark, including the Littoral Active Zone, as an Admiralty Zone. The layout also incorporates open space along the western boundary, allowing the community to continue using the area freely. The shoreline is not privatized and public access to the coast is maintained.
SANParks noted that while the DBAR recognises the potential impacts of the development, typically rated as medium to high, these are often downrated to low or very low following mitigation measures such as greening, limiting the development footprint, using permeable fencing, and establishing a buffer zone from the high-water mark. However, it was observed that the justification for this downrating is not clear, and in many cases, the significance ratings may remain unchanged despite the proposed mitigation.	The significance ratings prior to mitigation represent the potential level of impact in the absence of any mitigation measures. The Assessment team including the specialists and the EAP identify possible mitigation measures or recommended adjustments to the layout. The application of these recommended mitigation measures in full (permeable fencing, the establishment of a coastal buffer between the development and the high-water mark, the limitation of the development footprint, and extensive greening and landscaping) the associated visual and environmental impacts are predicted to be substantially reduced. These measures directly address the primary sources of impact, such as visual exposure, disturbance to coastal character, and vegetation clearance. Therefore, the post-mitigation ratings reflect the reduced residual impact following the effective application of these measures.
SanParks noted that the DBAR lists the loss of Southwestern Strandveld vegetation due to the development as "probable," whereas the specialist report indicates that clearing of vegetation is required, making the impact "definite." It was further observed that the downrating of this impact from medium to low, without additional mitigation and solely on the basis of avoiding development in parts of the site, is unclear. Additionally, the loss of public access and amenity, although acknowledged, was considered to be inadequately assessed.	The impact rating table is used to assess the impact of the development through four alternatives being investigated during the assessment. The previously preferred Alternative (Alternative 4), as highlighted in the Terrestrial Biodiversity Impact Assessment, excludes the development in the western portion of the site. Additionally, the New preferred Alternative layout (Alternative 5) also excludes development on the western portion of the site, except for the formalisation of the walkway. It is important to note, this will not have an impact on the vegetation present in this boundary and therefore, no vegetation clearance is expected as a result of placement of the timber, this is included as a condition of authorisation.
San Parks expressed concern that the traffic impact assessment only addresses localized traffic disruptions during peak hours. It was noted that the R319/Marine Drive is a critical route linking L'Agulhas, Struisbaai, and Bredasdorp, and broader traffic implications should be considered.	TIA's are only required for developments expected to generate 50 or more peak hour trips. For this development only a Site Assessment is required, which means that only the access and site layout needs to be assessed. The local transport impact associated with the six peak hour trips will be insignificant and it will be even less on the larger road network as the traffic disperses along the road network.
Raised concerns regarding the proposed site's location below the road and on a bend, highlighting potential impacts on the structural integrity and stability of the road. It was further observed that any deterioration of this	The project team acknowledged that impacts on the public road reserve are unavoidable due to the site's location. However, it was confirmed that the construction and development activities will be carefully managed to ensure that the structural integrity and stability of Marine

road could have significant negative effects on tourism to L'Agulhas and Agulhas National Park.	Drive are not compromised. Appropriate engineering and mitigation measures will be implemented to safeguard the road while allowing the development to proceed.
SANParks is not satisfied with the impact significance ratings in the attached DBAR and we recommend that the application is peer reviewed by a suitably qualified EAP.	The BAR has been amended and updated with additional specialist input to guide and inform the NEMA process further.
San Parks noted that the proposed development is located at the limits of demarcated risk zones, with "fine margins" that make it particularly sensitive. It was observed that potential impacts from climate change and extreme weather events are not adequately considered, raising concerns that the application does not fully adhere to the precautionary principle. It has been highlighted that if approved, subsequent engineering measures to protect the properties from storm surges or other environmental risks could compound impacts on the coastal environment, biodiversity, visual sense of place, and public access.	The concern regarding the location of the proposed development is noted. In response, additional specialist input has been included as well as specific siting changes on the proposed erven themselves. It must be emphasised that the residential footprints in the updated layout plan (Alternative 5) have been carefully positioned above the demarcated risk zones, thereby ensuring that no dwellings fall within areas identified as being directly vulnerable to sea-level rise, storm surges, or flooding. In addition, with the change in land use planning application, application is also being made for the relaxation of the rear building line to 0 m. This approach was deliberately adopted to adhere to the precautionary principle and to reduce exposure to climate-related risks from the outset. The engineering team have confirmed that no engineering interventions or gabions will be required or implemented for the development. Furthermore, the application has been assessed in line with the National Environmental Management: Integrated Coastal Management Act (NEM: ICMA) and other relevant legislation, which collectively emphasise responsible and sustainable use of the coastal zone. By ensuring that the development is situated beyond the risk zones, the need for future hard engineering interventions, such as sea walls or other forms of shoreline protection, is eliminated. This in turn helps to prevent potential knock-on impacts to biodiversity, sense of place, visual character, and public access. The updated Alternative 5 layout represents a more precautionary and sustainable option that balances the applicant's development rights with the imperative of safeguarding the coastal environment. It achieves this by avoiding development within the most sensitive and vulnerable portions of the site, thereby reducing long-term environmental risks associated with climate change and extreme weather events. A legal opinion specifically relating to the development proposal and application of ICMA is also provided – it was confirmed that the development sufficiently meets the requirement laid out in ICMA. See Appendix K.
SUIDPUNT RESIDENTS' ASSOCIATION	
Comment	**Response**
It was noted that the application appears to be based on a misconception regarding the developable area, suggesting that only approximately 7,000 m^2 is available for development. It was further highlighted that the remainder of the 450+ hectares could provide sufficient space for development, and this has not been accurately considered in the application.	The developer's proposal is for a coastal development and therefore the remaining property does not address the applicant development vision.
It was noted that the proposed development appears to encroach on an area intended for public open space, highlighting that neighbouring properties, including Helemika 1 and the entirety of Oceanview Heights, have	The application site has always been private land. Public access across this land parcel has always been allowed. The applicant wants to develop the land and will provide more formalised public access as part of the development proposal. Layout alternative 5 sees a

already been developed on the opposite side of Marine Drive.	reallocation of open space and confirmation of the admiralty zones and areas which, although part of the applicant's land, cannot be privatised. The existing access path on the western boundary will be formalised to provide safe access to the Spookdraai beach, for the public. Movement along the Marine Drive Road reserve, on the western section of the property as well as on the eastern boundary and along the coast in front of erven, will be maintained and accessible to the public. The only sections which will be restricted will be where the 6 erven are located. There will be no wall running along the length of the property from west to east.
The comment highlighted that the proposed development would result in a lasting, negative visual impact and permanently alter the landscape for humans, small animals, and flora. It was recommended that the development should not be approved and that the developer should instead disclose their intentions for the remaining approximately 450 hectares of land they own in Struisbaai.	The concern regarding potential visual impacts and changes to the character of the landscape is acknowledged. A Visual Specialist is appointed on the project. The proposed development has been designed to limit visual intrusion into the surrounding landscape by confining the built form to a modest footprint. Furthermore, the preferred layout (Alternative 5) incorporates open space areas and provides a widened public access route via Erf 7, with limited walls and fencing. These measures collectively reduce the overall impact on sense of place and support a more balanced integration of the development within the coastal environment. Specialised drone photography was used to assess the possible visual impacts of the development, and it was found that given the height limits on the houses, the visual intrusion was lowered. It is important to note that the remaining land owned by the applicant does not form part of the current application. Any future proposals for development on the larger property would be subject to a separate environmental authorisation process under NEMA and associated legislation. Such processes would again require specialist input and public participation to ensure that potential impacts are thoroughly assessed and responsibly managed.
Agulhas Heritage Society	
Comment	**Response**
AHS highlights that the HWC required that the HIA include; the identification and mapping of all heritage resources within the area of impact; an assessment of their significance in terms of heritage criteria; an evaluation of the impact of the development on these resources; a comparison of these impacts with the sustainable social and economic benefits of the development; documentation of consultation with affected communities and other stakeholders; consideration of alternatives if heritage resources will be adversely affected; and plans for mitigating any adverse effects during and after the development.	These are included in the HIA – the recommendations of the cultural heritage team (Heritage, Visual, Architectural, Landscape), have contributed significantly to the evolution of the new preferred layout, Alternative 5.
Further pointed out that the HIA must have specific reference to the following: - Archaeological Impact Assessment - Desktop Paleontological Impact Assessment - Visual Impact Assessment	The HIA includes Visual Impact Assessment, Archaeological Impact Assessment and Paleontological Impact Assessment as requested by Heritage Western Cape.
Highlighted that the comments of relevant registered conservation bodies; all Interested and Affected parties; and the relevant Municipality must be requested and	The relevant conservation bodies, interested and affected parties and organs of state were all consulted during the public participation phase, their comments are included

included in the HIA where provided. Proof of these requests must be supplied.	in the comments and response reports and have been attended to.
AHS noted that the pre-application draft Heritage Impact Assessment (HIA) for the proposed development of Split Portion Farm 281-RE, Marine Drive, Struisbaai, did not include several required elements. These omissions include: results of consultation with affected communities and other interested parties regarding heritage impacts; comments requested from relevant registered conservation bodies, all Interested and Affected Parties, and the relevant municipality; and proof of the request for such comments. HWC further noted that a final comment has not been issued, as consultation on the specialist HIA report—including its integrated recommendations relating to the Archaeological Impact Assessment, Desktop Paleontological Impact Assessment, and Visual Impact Assessment—has not yet been undertaken.	The HIA along with the AIA, PIA and VIA were included in the draft BAR and first round of public participation to all applicable organs of state, conservation bodies and other I&APs. A newspaper advertisement was placed in the Suidernuus, a noticeboard was placed on site, all adjacent landowners were notified via email and or post and the documents were made available for download on the EAPS website or provided directly to I&AP on request. The public participation was conducted in line with the NEMA requirements. This was the first round of public participation only and therefore formed the starting point for public consultation. Once the public participation has been concluded (minimum 2 rounds in total), the comments and responses, along with the proof of Public Participation, will be submitted to Heritage Western Cape for their internal decision making procedures as required in terms of the National Heritage Resources Act.
AHS strongly objected to the omission by the HIA practitioner and EAP in failing to request AHS comments on the Heritage Specialist practitioners' HIA report, as required by HWC. AHS expressed the view that this omission was deliberate, noting that the HIA report itself clearly states that, in terms of Section 38(8) of the NHRA, the current proposal is not supported. AHS further stated that the Heritage Specialist practitioners' HIA report is independent, professional, factual, and provides an integrated set of recommendations, and that their supplementary comments are intended to complement the report using additional information from their heritage information repository.	The role of the first round of public participation take place to identify all possible interested and affected parties. The AHS was added as a I&AP and included in the register. All registered Interested and Affected Parties (I&APs), including relevant Organs of State, were provided with an opportunity to review and submit comments on the Draft Basic Assessment Report (DBAR) during the formal Public Participation Process. The Heritage Impact Assessment (HIA) report formed part of the documentation circulated for public comment and was made available to all stakeholders. All comments received during this process are being considered and responded to as part of the environmental assessment process in accordance with the requirements of the National Environmental Management Act (NEMA) and its Regulations. The intent of the process is to ensure that all inputs including those from heritage authorities, specialists, and interested parties such as AHS are integrated into the decision-making process to inform the final Basic Assessment Report (FBAR) and the competent authority's decision. The EAP is bound by the NEMA regulations to conduct public participation, which is fair and in inclusive, as far as practically possible and therefore deliberate actions intended to avoid I&APs would be against the EAPS code of conduct.

AHS also noted that the proposed development site of approximately 7,113 m^2 allocates 3,132 m^2 to residential use, 3,204 m^2 as private open space (including private beach and shoreline), 688 m^2 for private street and refuse, and only 89 m^2 as public open space. It was highlighted that this severely limits public access, including access for traditional and visiting fishermen, contravening the original title deed and the Integrated Coastal Management (ICM) Act, which guarantees public access to coastal public property and associated benefits. The submission included objections from local fishermen, with Attachment 1 supported by 44 fishermen and Attachment 2 supported by 74 fishermen, specifically opposing restricted access to their traditional fishing areas. The report also noted that places of oral traditions were not established and considered unlikely.	The comments raised during the first round of public participation process were noted and have been addressed through a revision of the site layout and evolution of Alternative 5. The revised layout provides for a designated open space erf (Erf 7), a communal space, which is not private, thereby ensuring improved accessibility to the coastal environment for the broader public and local fishing community. The Admiralty zone remains as such, and public access way has been formalised via the upgrade of the existing path on the western end of the site. Access for public will be retained along Marine Drive within the road reserve, along the existing path located on the west end of the site, along the seaside of the proposed erven and along the eastern border. Therefore, a length of approximately 160 m along the Marine Drive Road Reserve will result in limited access directly to the coastline where the public would need to "walk around" to access the coastline in front of the houses and on either side. of This alternative is considered more consistent with the intent of the ICM Act and responds directly to the concerns raised by I&AP during the first round of public participation process. Note that Alternative 5 has been assessed by a Environmental Lawyer and a legal opinion provided regarding the proposal and the consideration of ICMA. The legal opinion concluded that the proposed development as presented in Alternative 5 sufficiently addresses the principles outlined in ICMA. See Appendix K.
AHS noted that the coastal portion of the Remainder of Farm 281 (the proposed development site) is part of a larger, contiguous landscape with a high degree of integrity, particularly the area below Marine Drive, which is considered a very good quality landscape. AHS emphasized that this landscape constitutes a "place" extending from the historical site of "The Man Alone House" to at least the historical "water trough" and "Hangnes Outspan" site. The authority further noted that many oral traditions are attached to this landscape, including those associated with the Spookdraai Gorge.	Noted and addressed in both the HIA and VIA.
The authority noted that the operational phase visual impact of the proposed development is of high negative significance, based on the combined aspects of nature, duration, intensity, extent, and probability. It was observed that, given receptor sensitivity and the anticipated magnitude of change, the site is highly sensitive to visual change, resulting in a major negative impact. Furthermore, the lack of defined architectural and landscape parameters, as well as the absence of a landscape plan and mitigation measures, was highlighted as contributing to a significantly high negative visual impact, leading the authority to conclude that the development cannot be supported.	The Visual Impact Assessment (VIA) has been updated to incorporate the revised layout and additional mitigation measures. The assessment now reflects a reduction in impact significance during the operational phase following the implementation of The Recommended mitigation measures. Furthermore, A Landscape Plan as well as an Architectural Guideline Report has been developed and incorporated to inform the updated site layout and design parameters. These guidelines provide clear direction on building form, materials, colours, heights, landscaping, and visual screening measures, ensuring that the proposed development integrates more effectively with the surrounding landscape and visual context. As a result, the potential visual impact during the operational phase has been significantly reduced from the initial assessment.
AHS noted that there are no identifiable sustainable socio-economic benefits that outweigh the high negative impacts of the proposed development. AHS also agreed that, for the currently preferred site, the potential socio-economic benefits do not justify the significant negative environmental and heritage impacts.	The concern is acknowledged. It should be noted that the property is privately owned, and the proposed development is consistent with the applicant's rights to apply for development within the applicable planning and zoning framework. The final decision relating to any approval is left with the DEA&DP (NEMA) and CAM (Landuse). While the scale of the development is relatively small, it will nevertheless contribute to local

	socio-economic benefits through short-term employment opportunities during construction, the use of local contractors and suppliers, and long-term economic contributions through rates, taxes, and local spending by future residents. These benefits, though modest, are considered sustainable and aligned with the scale and nature of the proposed development.
AHS noted that a comparative assessment, as required by the EIA guidelines, between the proposed site and other potential alternative sites may have identified areas on the larger portion of the Remainder of Farm 281 where socio-economic benefits could potentially outweigh the heritage impacts identified on those sites.	The comment is acknowledged. The proposed development is in line with the applicant's vision for the establishment of a coastal residential development on the Remainder of Farm 281. The site selection process took into account the property boundaries, existing environmental sensitivities, and the desired development objective within the context of the landowner's vision. No alternative sites were taken forward for detailed assessment, as the applicant's vision specifically relates to the coastal residential node within the coastal portion of the property. The comparative assessment of alternatives therefore focused on variations in layout design and configuration within the same cadastral boundary to avoid and minimise environmental and visual sensitivities, rather than relocation elsewhere on the farm, which would not achieve the applicant's intended development purpose.
AHS noted that, as a registered I&AP, it was only requested to comment on the EAP's pre-application Basic Assessment Report (BAR) and not on the draft HIA report, as required by HWC. The authority emphasized that HWC specifically requires AHS to comment on the HIA report itself, and therefore AHS is providing this separate comment directly to HWC, distinct from its comments on the BAR.	The HIA along with the AIA, PIA and VIA were included in the documents advertised for comment during the first round of PPP in line with both NEMA and the NHRA. Given the amended nature of the HIA, another commenting opportunity on both the BAR and HIA will be provided for.
AHS recommended that Heritage Western Cape provide interim comment endorsing the report as meeting the requirements of Section 38(3) of the NHRA, while noting that, in terms of Section 38(8) of the NHRA, the current development proposal is not supported.	The process in terms of the NHRA, as per Heritage Western Cape requirements, dictates that the HIA or any amended document must be circulated to I&APS and proof of such, along with the final HIA and associated documents, must be submitted to HWC for their decision-making process. HWC does not accept any other method for decision making on heritage applications.
AHS noted that the relevant Special Environmental Management Area (SEMA) for this application is the National Environmental Management: Integrated Coastal Management Act (ICM Act) (Act No. 24 of 2008). It was emphasized that the assessment process must comply with both the EIA Regulations and the specific requirements of the ICM Act. Further, they highlighted that the application for authorisation of the listed activities under the ICM Act requires an EIA in accordance with the NEMA EIA regulations	The BAR has been amended and is in accordance with the NEMA and ICMA requirements. This is further supported by legal opinion relating to ICMA.
AHS noted that, in response to the Notification to Develop (NID), a Heritage Impact Assessment (HIA) is required in terms of Section 38(1) of the National Heritage Resources Act (NHRA) (Act 25 of 1999). The HIA report must include specific requirements before HWC can issue a final response, including results of consultation with affected communities and other interested parties. This entails requesting and documenting comments from relevant registered conservation bodies, all Interested and Affected Parties, and the relevant municipality, as well as providing proof that such comments were requested. HWC observed that these requirements were not included, which necessitated the separate inclusion of	The HIA along with the AIA, PIA and VIA were included in the draft BAR and first round of public participation to all applicable organs of state, conservation bodies and other I&APs. A newspaper advertisement was placed in the Suiderpos, a noticeboard was placed on site, all adjacent landowners were notified via email and or post ad the documents were made available for download on the EAPS website or provided directly to I&AP on request. The public participation was conducted in line with the NEMA requirements. This was the first round of public participation only. The amended documents and final preferred layout – Alternative 5, will be advertised to I&APs for an additional

AHS comments on the HIA report itself, as outlined in Part 1 above.	round of public participation before being submitted to Heritage Western Cape for decision making.
AHS highlighted that the BAR did not properly consider the needs and desirability of the development.	The Need and Desirability section has been amended.
AHS noted that there are no alternative sites that were investigated and assessed.	There are no site alternative options available for this kind of development proposal.
AHS noted that the proposed development is likely to cause irreversible or long-lasting adverse effects on the coastal environment that cannot be adequately mitigated. It was further observed that the development is situated within coastal public property and is inconsistent with the objective of conserving and enhancing such areas for the benefit of current and future generations. The proposal was also considered not to be in the interests of the community as a whole, and that alternative sites, which have not been assessed, may exist for the development.	These concerns and indicated that they have been taken into consideration in the evolution of the new preferred layout (Alternative 5). This layout incorporates an open space erf on the western portion of the property, ensuring continued public access to the shoreline, preserving sensitive areas, and minimizing potential impacts on the coastal environment while accommodating the proposed development.
DEADP: LAND USE	
Comment	**Response**
It is noted that the proposed development includes a 375 mm stormwater pipeline of unspecified length. It was recommended that the applicability of Activity 9 of Listing Notice 1 be confirmed. If found applicable, this activity should be included in the application and addressed accordingly.	Refer to **Appendix G9b** Civil layout plan for the stormwater pipeline. Activity 9 Listing Notice 1 is not triggered, as the length of the stormwater pipeline will only be approximately 132.41m in length and will not exceed 1000m.
It is noted that the motivation provided for the applicability of Activity 12 of Listing Notice 3 is inadequate. It was recommended that the motivation clearly indicate whether 300 m^2 or more of vegetation classified as a critically endangered or endangered ecosystem will be cleared.	The BAR has been amended to address this issue. It now clearly indicates that Southwestern Strandveld, classified as an Endangered vegetation type, will be cleared as part of the proposed development.
DEADP noted a discrepancy regarding the proposed road width: the report indicates a maximum width of 4 m, whereas the Civil Engineering Report specifies 5.5 m. It was recommended that the correct road width be confirmed and that the applicability of Activity 4 of Listing Notice 3 be clarified accordingly.	The road will be a maximum of 6m wide and 160m in length. This activity is not applicable to the proposal.
DEADP noted that the proposed development will include a public access pathway. However, the length and width of the pathway have not been included in the activity description.	The formal walkway proposed on Erf 7 (Alternative 5) will be 20 m in length and 12 m width. Refer to **Appendix G11b** of the Landscape Plan for illustration.
Noted that the lengths of the stormwater, water, and sewage pipelines have not been specified in the activity description. It was recommended that the activity description be updated to include these details, including the diameter of the stormwater pipeline.	The length of the stormwater, water and sewage pipelines will not exceed 1000 meters in length. See updated Civil Layout Plans attached. Stormwater pipeline; ±132.41m length. Water Pipeline: ±160 m length Sewage pipeline: ±160m length.
DEADP recommended that clarification be obtained from the municipal planning department regarding the site designation and whether the proposed development aligns with the municipal Spatial Development Framework (SDF).	The property falls within the urban edge of the Cape Agulhas Municipality, refer to Appendix G12 for confirmation by CAM.
DEADP recommended that written confirmation be obtained from Cape Agulhas Municipality to verify sufficient capacity for potable water supply, effluent management, and solid waste management. Additionally, written confirmation should be obtained from Eskom to confirm adequate capacity for electricity supply.	Service confirmation is attached under **Appendix J.**

Noted that the BAR refers to a No-go as Alternative 1, and recommended that this must be corrected.	This has been amended – relates to the numbering of Alternatives and reference to No Go as a layout.
A Final comment form HWC is required.	A Final approval from HWC will be submitted with the Final BAR.
Highlighted that the development is located within 100m of the High-Water Mark and that a comment form coastal management must be obtained.	Comment is attached below.
Noted that the proposed development will result in the clearance of indigenous vegetation classified as an endangered ecosystem. It was recommended that comments be obtained from CapeNature regarding the loss of this endangered vegetation. Additionally, input from the Department of Agriculture, the relevant road authority, and Cape Agulhas Municipality is required.	Comment from Cape Nature, DoA and Cape Agulhas Municipality are attached. Department of Infrastructure: Road Planning, have also been consulted regarding the proposed access of Provincial Road MR 261, over the road reserve to the development site, however, their comment is still pending.
DEADP: CMU	
Comment	**Response**
It is noted that Farm RE/281 is located seaward of the Overberg District Coastal Management Line (CML) and that the applicant acknowledged this. While the development proposal was reviewed against coastal risk zones, including erosion, storm surge, and sea-level rise projections, DEADP expressed concern that the proposed dwellings, as illustrated in Figure 33 of the DBAR, are positioned toward the seaward boundaries of the residential erven, in close proximity to the high-water mark. No alternative locations for the dwellings were provided, nor was an explanation given for why the dwellings could not be situated toward the landward boundaries. The authority emphasized that, regardless of whether the dwellings are above the 5 m contour or outside the formal coastal risk zones, the property is seaward of the CML and not a development island, placing any development at high risk from coastal processes, including storm surges and climate change impacts.	The new updated layout (Alternative 5) has taken into account the Medium Density Housing zoning provisions, which allow for 5-metre street building lines and 0-metre internal building lines. This zoning flexibility has enabled the dwellings to be set back further inland from their original proposed positions. It is important to note that there is the Marine Drive Road Reserve which is located between the subject property and the actual Marine Drive surfaced road area and therefore the development cannot be shifted alongside Marine Drive.
DEADP noted that the development proposal includes a Public Open Space (Erf 7) and a Private Open Space (Erf 8). It was highlighted that much of the proposed private open space falls below the high-water mark and is therefore considered Coastal Public Property in terms of the NEM: ICMA. The applicant must be informed of the risk of property loss if the high-water mark moves inland, in accordance with Section 14 of the NEM: ICMA and the Advisory Note from the Office of the Chief Surveyor-General (15 October 2021). While the authority appreciated the inclusion of a public footpath via Erf 7, it emphasized that the land below the high-water mark on Erf 8 cannot be privatized or used exclusively by residents. The applicant was advised to consider Sections 7, 11, 13, and 14 of the NEM: ICMA in this regard.	The comment regarding the designation of land below the high-water mark as Coastal Public Property in terms of the NEM: ICMA is acknowledged. The applicant takes note of the risks associated with potential inland movement of the high-water mark and the implications set out under Section 14 of the NEM: ICMA and the Advisory Note issued by the Office of the Chief Surveyor-General (15 October 2021). The area that was previously designated as Private Open Space (Erf 8) under Alternative 4, is now designated as an Admiralty Zone in the current preferred layout (Alternative 5). Moreover, an open space is incorporated in the western portion of the property confirming that this area will not be privatised and will be accessible for use by public. Existing access on the western end of the subject property will be formalised with a walkway. The inclusion of a formal walkway reflects the applicant's commitment to ensuring coastal access in line with the requirements of the NEM: ICMA. It is important to note that access restriction because of the development is minimal and only relates to an approx. 160 m length of the property running east to west where the erven will be developed. The public will still be able to access the beach via the existing western access point on the property, along the road reserve of Marine Drive, along the

	eastern boundary of the site and all along the sea front of the properties.
DEADP noted that the applicant considered the impacts of recent storm events and demonstrated that the subject property, due to its rocky nature, was unaffected. As a result, no concerns were raised regarding flooding, sand movement, or erosion. While the applicant indicated that proposed infrastructure would be set back as far as possible within each erf, the authority emphasized that the proposed dwelling locations are not supported, as there is insufficient buffer to mitigate potential effects of coastal processes given their proximity to the high-water mark.	Comment is noted. The built footprint of the residential dwellings in the new updated layout (Alternative 5) has been shifted further inland, away from the demarcated risk zones. This revised positioning reduces potential exposure to flood and coastal processes while maintaining functional site access and visual integration with the surrounding landscape. Please refer to the updated preferred layout (Alternative 5) for detailed illustration of the new dwelling positions and their relationship to the identified coastal risk zones.
DEADP highlighted that, in terms of Departmental Circular DEA&DP 0004/2021 on the consideration of coastal risk in land use decisions and the implementation of Coastal Management Lines under the NEM: ICMA, a precautionary approach must be applied for developments within coastal risk areas. The Circular recommends that development parameters consider maintaining coastal quality, reducing public liability, minimizing risk to human life, preventing intensification of development in risk areas while allowing existing rights, avoiding encroachment on shoreline ecology, and enabling safe evacuation in emergencies. It further states that any proposed coastal development should be carefully scrutinized and approached with caution.	The precautionary approach advocated in Departmental Circular DEA&DP 0004/2021 is acknowledged. The updated layout plan (Alternative 5 – preferred) has evolved to align with this principle by ensuring that the proposed residential erven are located outside of the demarcated coastal risk zones and above the 5 m contour. No development is proposed within the identified high, medium and low risk zones. Public access is maintained through the dedicated footpath (Erf 7), ensuring that the development does not impede coastal access rights.
DEADP noted that, according to the Coastal Access Audit for the Overberg District, the subject coastline provides unrestricted pedestrian access and supports recreational activities such as swimming, fishing (recreational, subsistence, and commercial), walking, bird watching, and dog walking. This accessibility contributes significant tourism, social, and sense-of-place value. The authority further noted public concern regarding the potential impact of the proposed development on historical access to the coast and questioned whether the development would serve the interests of the entire community—including fauna and flora—as defined in the NEM: ICMA, particularly given the site's location within the Coastal Protection Zone (CPZ).	The importance of maintaining unrestricted pedestrian access to the coastline, as highlighted in the Coastal Access Audit for the Overberg District, is fully acknowledged. The proposed development has been carefully designed to retain and formalise public access through the inclusion of a widened public footpath via Erf 7, which will lead directly to the coast. The proposal recognises the significant social, tourism, and sense-of-place value of the coastline and has therefore incorporated measures to safeguard public access while confining residential development to a limited footprint. The layout also takes into consideration the provisions of the NEM: ICMA by ensuring that development within the Coastal Protection Zone (CPZ) is planned in a manner that balances the applicant's rights with the broader interests of the community, as well as the need to protect coastal biodiversity. In this regard, the preferred layout (Alternative 5) is considered a more appropriate option as it provides a structured solution that both maintains community access to the coast and minimises environmental impacts, thereby aligning with the objectives of the ICMA. Furthermore, a legal opinion was sought relating to Alternative 5 relative to ICMA and it was concluded that the proposal sufficiently considers the principles of ICMA.
DEADP highlighted that on page 42 of the DBAR, the applicant incorrectly referenced Sections 14 and 15 of the NEM: ICMA in relation to coastal access. The authority clarified that Section 14 pertains to the position of the high-water mark and Section 15 addresses measures affecting erosion and accretion. The relevant sections regarding public access to coastal public property are Sections 13 and 18 of the NEM: ICMA.	Noted. This has been amended.
DEADP concluded that, based on the above considerations, the SD: CM does not support the	The concern is noted. The new updated layout (Alternative 5) has been specifically revised to address issues related

proposed subdivision and rezoning for residential development. It was noted that the site would be more appropriately used in a manner that serves the interests of the whole community, as defined in the NEM: ICMA. The proposed development would result in the privatization of a stretch of coastline historically accessible to the public and situated along a scenic route.	to public access and coastal use. This layout now incorporates a dedicated Open Space zone (7) and a formalised public walkway that ensures continued and managed access along the coastal frontage. These design changes directly respond to concerns regarding the potential privatisation of the coastline and safeguard the public's right of access, in line with the objectives of the National Environmental Management: Integrated Coastal Management Act (NEM: ICMA). The inclusion of the open space (7) also provides opportunities for community use and enhances the visual and recreational experience along this scenic route, while the residential component has been positioned further inland to reduce conflict between private and public use areas.
It is noted that the proposed development is not aligned with the purpose of the Coastal Protection Zone (CPZ) as set out in Section 17 of the NEM: ICMA. It was observed that the development does not protect the ecological integrity or natural character of the coastline, nor does it safeguard the social and aesthetic value of coastal public property. Additionally, the development does not mitigate risks to people, property, or economic activities from dynamic coastal processes, including sea-level rise, and it fails to maintain the natural functioning of the littoral active zone or the productive capacity of the coastal zone.	Comment is noted. The updated preferred layout (Alternative 5) has been specifically revised to improve alignment with the purpose of the Coastal Protection Zone (CPZ) as outlined in Section 17 of the National Environmental Management: Integrated Coastal Management Act (NEM: ICMA). The new layout significantly reduces impacts associated with coastal environment and climate change by shifting all residential dwellings further inland and outside of the identified risk zones, thereby enhancing protection of the ecological integrity, natural character, and visual quality of the coastline. In addition, an Admiralty zone has been incorporated into the design to maintain and enhance the social and aesthetic value of the coastal public property while ensuring that public access via Erf 7 is safeguarded and appropriately managed. The revised layout avoids disturbance to the littoral active zone, retains natural drainage and dune processes, and introduces mitigation measures to prevent erosion and maintain the productive capacity of the coastal zone.
WARD 5 COUNCILLOR	
Comment	**Response**
No alternatives to the proposed development are identified, investigated or assessed i.e. No discrete alternative sites have been identified and comparatively assessed.	Site alternatives are not available for consideration of the development proposal at hand.
Noted that there is number of suitable alternative sites are available within the Split Remainder of Farm 281, the claim that no alternative sites exist is fallacious and disingenuous.	The remainder portion is not included in the current development proposal
No exemption has been applied for by the applicant or the EAP	The site is privately owned land and is situated within the demarcated urban edge.
No detailed information on the consideration of alternative sites has been provided in the relevant reports.	Site alternatives are not available for consideration of the development proposal at hand.
Interested and affected parties have not been afforded an opportunity to provide inputs into the consideration of alternative sites.	The public was given an opportunity to comment on the Draft BAR wherein alternatives are assessed in line with the NEMA Requirements
The omission of the investigation of the discrete alternative sites available is a deliberate attempt to withhold significant information from the competent authority and equates to deliberate disinformation.	No alternative viable alternative site alternatives which align with the development proposal at hand.
Noted that the BAR does not meet the EIA regulations requirements to property consider "need and desirability"	The Need and Desirability section in the BAR has been amended

Ward Councillor noted that the applicant's claim that this site is the "only preferred alternative" is misleading. It was emphasized that NEMA and the EIA Regulations require a hierarchical approach to impact management, where alternatives must first be considered to avoid negative impacts entirely, and only then to reduce or mitigate unavoidable impacts. The councillor further observed that the applicant owns multiple alternative vacant sites within the Split Remainder of Farm 281, within the defined urban edge of Struisbaai and L'Agulhas, which was not disclosed in the pre-application BAR. By not conducting a comparative analysis of these alternative sites, the conclusion that significant potential negative impacts on heritage, archaeology, palaeontology, cultural landscapes, and visual sensitivity are unavoidable is considered fallacious and misleading. It is emphasized that NEMA requires a full comparative analysis of alternative sites, not merely alternative layouts on a single site.	The comment regarding the consideration of alternatives is noted. In terms of the NEMA EIA Regulations, the Environmental Assessment Practitioner (EAP) has applied the mitigation hierarchy by investigating layout alternatives within the subject property to avoid and minimise potential negative impacts. The alternatives assessment considered four layout options, culminating in the revised and preferred Alternative 5, which significantly reduces potential environmental risks by avoiding sensitive areas and ensuring public access to the coastline. With respect to the applicant's broader land ownership, it is important to clarify that this application relates specifically to the development of a portion of Farm 281, which is the subject of the current environmental authorisation process. Other properties under the applicant's ownership within the urban edge of Struisbaai and L'Agulhas do not form part of this application
WHALE COAST CONSERVATION	
Comment	**Response**
Whale Coast Conservation (WWC) noted that development on the site does not comply with the Western Cape Provincial Spatial Development Framework (WCSDF), as it will not protect natural resources or reduce pressure on natural landscapes, contrary to assertions in the BAR (page 18). It was further emphasized that developing the site would result in the destruction of natural resources and landscapes.	The development site is situated within the Cape Agulhas demarcated urban edge, refer to **Appendix G12**. The vegetation type that will be removed is situated on the Eastern boundary of the site, resulting to residual impacts of low for Alternative 4 and 5, based on the botanical specialist findings.
WCC noted that the WCSDF aims to better protect spatial assets, including cultural and scenic landscapes, and to strengthen the resilience of natural and built environments. Development on the site is expected to weaken the resilience of the natural environment as well as the cultural and scenic landscapes characteristic of the area. Although the BAR asserts alignment with the PSDF goal that residents use land and finite resources prudently to safeguard ecosystems, the authority considered this claim unsubstantiated, noting that development would have the opposite effect. Furthermore, the proposed development would be contrary to the 2010 Need and Desirability Guidelines, as it does not respect local environmental integrity and would replace existing natural elements rather than preserving them.	Alternative 5 reflects a substantial reduction in the overall development footprint, with residential units repositioned further inland to avoid sensitive coastal areas and to maintain the visual integrity of the scenic coastal landscape. The revised layout incorporates an open space zone and a formal coastal access pathway via Erf 7, collectively enhancing the social and aesthetic value of the site while ensuring continued community use and appreciation of the coastline. Furthermore, an area previously designated as Private Open Space (Erf 8) that falls below the High-Water Mark is now designated as an Admiralty Zone, ensuring public access and protection of coastal public property. The proposal, therefore, does not seek to substitute or degrade the local environment but rather to integrate with it through sensitive design, low-intensity residential use, and public access enhancement, aligning with the principles of responsible development and prudent resource use as envisaged by the PSDF and the 2010 Need and Desirability Guidelines.
WCC noted that the shape, size, and position of the site make it highly vulnerable to natural hazards and elemental unpredictability. As a result, any development on the site would be at significant risk from such environmental factors.	These risks have been carefully considered in the BAR and the application of relevant coastal management legislation, including the NEM: ICMA and DEA&DP Circular 0004/2021 on coastal risk. The proposed development has been designed with a precautionary approach, taking into account sea-level rise, storm surge events, and the potential inland movement of the high-water mark. Infrastructure has

	been located outside of the highest-risk areas as far as practically possible
WCC noted that the site is located within 100 metres of the high-water mark, and Figure 2 on page 16 of the BAR shows that a 1-in-10 high-water event would inundate a significant portion of the site. The southern Cape coast is prone to such events, as well as episodic wave action, which are expected to increase in frequency and intensity due to climate change.	The revised layout ensures that all proposed residential dwellings and associated infrastructure are positioned above the 5-metre contour line, thereby placing them outside of the identified coastal risk zone and reducing potential exposure to flood or storm surge impacts. Moreover, house positions have been moved further inland from their original positions. This approach directly responds to concerns raised about sea-level rise and climate change-related risks. The Admiralty zone is designated to maintain natural coastal processes, allowing for buffering of wave action and potential water level fluctuations without compromising infrastructure integrity or public safety. Furthermore, the coastal setback lines and development restrictions have been informed by current Coastal Management Line data ensuring that the development does not occur within areas of high dynamic risk.
WCC noted that, as stated on page 48 of the BAR, the proposed development would transform land currently covered with indigenous vegetation into built form, encompassing the high-water mark, the 5 m contour, and all coastal risk zones (low, medium, and high). The authority emphasized that this proximity to the coast renders the site environmentally inappropriate for development.	The development will be situated landward and above the demarcated risk zones. The previously preferred (alternative 4) layout showed that one of the erven slightly encroaches into the low-risk zone, however, the new preferred (Alternative 5) includes the building footprint which are positioned further inland and away from the demarcated risk zones, see
WCC noted that, on page 41 of the BAR, it was stated that a coastal environment study was "not required" because the development is located above the 5 m contour and outside the low, medium, and high-risk zones. They considered this as a major omission, indicating that a coastal environment study should have been undertaken. It was further noted that the site is misrepresented in Figure 4 on page 32, and if it is indeed adjacent to the exposed headland to the southeast, this underscores the environmental vulnerability of the site.	The property is considered to be at a lower risk of coastal erosion due to the underlying rocky substrate, which provides natural protection and stability. Furthermore, the site is located within a relatively sheltered bay, where wave action and inundation are significantly reduced compared to more exposed coastal areas. Based on these site characteristics and available risk mapping, a dedicated coastal environment study was not deemed necessary. However, the positioning of the site will be verified and clarified in the final documentation to address concerns raised regarding the figure reference in the BAR.
WCC noted that photographs in the Terrestrial Impact Assessment show a stormwater culvert from Marine Drive discharging onto the site, causing notable erosion. This highlights the site's current role in processing external water and the importance of vegetation in binding aeolian sand and preventing further erosion. WCC further emphasized that development would alter these natural functions to protect on-site infrastructure, critically affecting their efficiency.	The concern regarding the stormwater culvert and associated erosion is acknowledged. The existing stormwater culvert from Marine Drive will be redirected eastward, away from the development footprint, so that it flows along the eastern boundary of the site directly to the sea. Within the proposed development, all erf and road levels will be designed and shaped to ensure adequate falls toward a formalised stormwater system. This system will discharge to the sea, but with safeguards in place to prevent environmental degradation. These include the installation of a stormwater dissipation structure, a silt and debris trap to prevent contamination at the coast, and the use of reno-mattresses at the overflow point to minimise erosion risks. Collectively, these measures will manage stormwater more effectively than the current situation and will ensure the protection of coastal processes and vegetation integrity.
WCC noted that the Botanical Impact Assessment, although titled as such, primarily aimed to identify botanical and terrestrial biodiversity constraints on development. The assessment included a desktop study and a single two-hour site visit on 20 December 2022. The specialist identified a well-vegetated, diverse mixture of	The Terrestrial Biodiversity Impact Assessment has been updated.

Southwestern Strandveld and Cape Seashore Vegetation on deep sand above a rocky Table Mountain Group sandstone shore, along with some alien species. Despite erosion from a stormwater culvert from Marine Drive, natural revegetation indicates a healthy ecosystem. The western portion of the site contains Agulhas Limestone Fynbos, classified as Critically Endangered. No vegetation was found on the rocky shore due to its highly energetic and abrasive nature, and the ecological function of the mixed shore was not addressed. The authority emphasized that these habitats support different biological communities depending on shelter, wave impact, and stability, including microscopic life forms essential to the dynamic functioning of the ecosystem.	
WCC noted that the dynamic nature of the site means its ecological functions change as needed, sometimes rapidly. For example, it provides important foraging areas as well as shelter and refuge during extreme weather, but these areas are transient. Therefore, the absence of fauna observed during the two-hour summer site visit does not necessarily indicate that no fauna is present, as concluded in the report, but rather that it was not evident at that specific time.	An Animal Species Compliance Statement was undertaken.
It is noted that the Botanical Impact Assessment concluded that no species of concern were present and downgraded the terrestrial biodiversity sensitivity from High–Very High to Medium. However, the report itself acknowledged that the two-hour site visit was only a snapshot in time and observations cannot be considered definitive. Despite this, the BAR accepted the downgraded rating and further minimized impacts by emphasizing that a significant portion of the site is bedrock or beach, leaving less than 0.5 ha of true Strandveld or Agulhas Limestone Fynbos, and claimed cumulative impacts would be Low Negative. The BAR also stated that no bird or insect communities were observed using the habitat. WCC considered this selective interpretation of findings to present the proposal in an overly favorable light as misleading and disingenuous, with similar examples occurring throughout the BAR.	The concern regarding the interpretation of the botanical findings is noted. The Terrestrial Biodiversity Impact Assessment has since been updated to incorporate the most recent information. The specialist study acknowledges that the field assessment represents a point-in-time observation and that certain ecological processes may vary seasonally. However, the conclusions regarding the relative sensitivity of the site and the absence of species of conservation concern were informed by both fieldwork and a review of available background information, including the national screening tool and vegetation mapping. The determination that the sensitivity rating should not be higher than Medium reflects the specialist's professional judgement following this integrated assessment. It is important to emphasise that the Basic Assessment Report (BAR) did not seek to misrepresent these findings, but rather to transparently incorporate them into the broader impact assessment. Accordingly, the BAR has been amended to align with the updated Terrestrial Biodiversity Impact Assessment, ensuring that the assessment reflects the most current botanical information available.
WCC noted that the need and desirability of the proposed development are overstated, and a strong case cannot be made beyond the developer's gains. While the BAR references benefits such as job creation and economic growth, the authority observed that these would be limited to a few temporary construction jobs and residential or tourism opportunities on six small properties. The BAR's claims of ecological enhancement, such as rehabilitating degraded portions of the site (page 37), were considered misleading in the context of the total loss of vegetated dunes and damage to the rocky shore.	The Need and Desirability section has been revisited and updated to provide a more balanced motivation for the proposed development. Importantly, the development layout has been refined (Alternative 5 – preferred) to avoid high-sensitivity areas, minimise environmental disturbance, and retain open space linkages, thereby integrating both ecological and social considerations into the planning process.
WCC noted that the Visual Impact Assessment (VIA) identifies the site as a pivotal point in the coastal landscape, featuring a small inlet and beach opposite a green, vegetated open space. The area's rugged, exposed character and the existing placement of residential development behind Marine Drive create a visual buffer	Noted. The overall visual impact of the proposed development under the updated layout (Alternative 5) has been reduced, provided that the Architectural Guidelines and Landscape Plan are fully implemented.

between the ocean and the road. WCC emphasized that any development on the site would intrusively interrupt this visual pattern and diminish the scenic quality of the coastal landscape.	
WCC noted that the socioeconomic benefits of the proposed development are minimal.	The concern regarding the extent of socio-economic benefits is noted. It is acknowledged that the proposed development is relatively small in scale and that the majority of socio-economic benefits will be limited to temporary employment opportunities during the construction phase, along with some indirect stimulation of the local economy through the use of local contractors, suppliers, and service providers. The BAR has been updated to reflect this more proportionately and to avoid overstating the potential benefits.
WCC noted that the BAR (page 170) failed to address the required consideration of climate change, incorrectly stating it as "Not Applicable." The authority emphasized that climate change is a critical factor in development planning. With global temperatures exceeding the 1.5 °C Paris Agreement target and projections for South Africa indicating further increases, coastal areas are expected to face heightened risks from extreme weather events, including storms, flooding, and fire. The site's location renders it particularly vulnerable to these impacts, and the authority concluded that development on this site should not be approved without fully considering climate change risks and long-term ecosystem functioning.	This section has been amended in the BAR.
WCC conclude that the proposal is in conflict with the Coastal Protection Zone; it will jeopardise natural coastal processes and biodiversity. A Coastal Environmental Study should have been done.	Comment is noted. The concern regarding the proposal's potential conflict with the Coastal Protection Zone (CPZ) and its implications for natural coastal processes and biodiversity has been carefully reviewed and addressed through both the specialist assessments and the updated layout design (Alternative 5). The revised preferred layout (Alternative 5) has significantly reduced the development footprint within the CPZ, with all residential dwellings and primary infrastructure repositioned further inland and outside of the identified sensitive coastal risk and ecological zones. This ensures that natural coastal dynamics, including sediment transport, dune movement, and tidal influence, remain largely uninterrupted.
Noted that the Terrestrial Impact Assessment is inadequate, as it focuses primarily on vegetation and botanical elements while overlooking the dynamic ecology of the rocky and sandy shore. Furthermore, the assessment downgrades the screening tool results based on limited field observations, despite acknowledging that the two-hour site visit was insufficient to provide definitive results.	Terrestrial Biodiversity Impact Assessment has been updated accordingly.
WCC noted that neither the need nor the desirability of the proposed development has been demonstrated. It emphasized that any financial benefit to the developer would come at the expense of an irreplaceable natural environment.	This section has been amended in the BAR.
The visual impact of the development on the currently "of a piece" seaward visuals will be marked, even if design mitigation measures are put in place.	Comment is noted. The Visual Impact Assessment (VIA) has been updated to reflect the revised site development layout (Alternative 5), which was specifically amended in response to public input and the findings of the initial visual assessment. The updated layout has repositioned the residential dwellings further inland, reducing the overall visual exposure from key public viewpoints, particularly from the coastal access route and adjacent open spaces.

	In addition, design and landscaping measures have been incorporated to further mitigate potential visual intrusion. These include the use of natural materials and colours that blend with the surrounding coastal landscape, low-profile architectural forms, and strategic vegetation screening to soften the visual transition between built and natural elements. While some degree of visual change is inevitable due to any new development in a coastal setting, the updated design has minimised visual contrast and cumulative visual effects, ensuring that the proposal remains consistent with the rural coastal character and scenic quality of the area. The updated VIA concludes that, with the mitigation measures implemented, the visual impact can be reduced to low negative impact.
DEPARTMENT OF AGRICULTURE	
Comment	**Response**
The department has no objection to the proposed subdivision and rezoning of the property.	Noted. No further action required.

Note:

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

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

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

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

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

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

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

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. Groundwater - not required

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

2. Surface water - not required

2.1.	Was a specialist study conducted?	YES	NO x
2.2.	Provide the name and/or company who conducted the specialist study.		
N/A			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		
N/A			

3. Coastal Environment

Not required, the development is located above the 5m contour and outside the low, medium and high-risk zones

3.1.	Was a specialist study conducted?	YES	NO x
3.2.	Provide the name and/or company who conducted the specialist study.		
N/A			
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		

Please see Legal opinion relating to Layout Alternative 5 relating to the applicability of ICMA (Appendix B).

Conflict with the Coastal Protection Zone (CPZ)

It is important to note that the majority of the town of Struisbaai lies within the Coastal Protection Zone (CPZ) as defined in Section 63(1) of the ICMA. The proposed development does not conflict with the objectives of the CPZ, which seek to protect natural coastal processes, maintain biodiversity, and secure public access to the coast.

The nature, scale, and location of the proposed development have been evaluated in terms of appropriateness, and specific design measures have been implemented to ensure that the development supports the intent of the CPZ rather than undermining it.

Coastal Public Property and Legal Framework

According to Section 7 of the NEM: ICMA, Coastal Public Property is owned by the State and held in trust for the benefit and enjoyment of the public. Furthermore, Section 11 stipulates that Coastal Public Property is inalienable, meaning it cannot be sold, attached, or acquired by prescription, and no private rights can be obtained over it. This legislative framework reinforces the principle of public access and places an obligation on developments adjacent to the coast to respect, maintain, and not infringe upon public coastal property.

In accordance with these provisions, Remainder 281 is privately owned land; however, the southwestern portion of the property extends into the coastal public access area below the surveyed High-Water Mark (HWM). In the earlier Alternative 4 layout, this portion was incorrectly designated as private open space (Erf 8), which would have restricted public access and resulted in the partial privatisation of the beachfront.

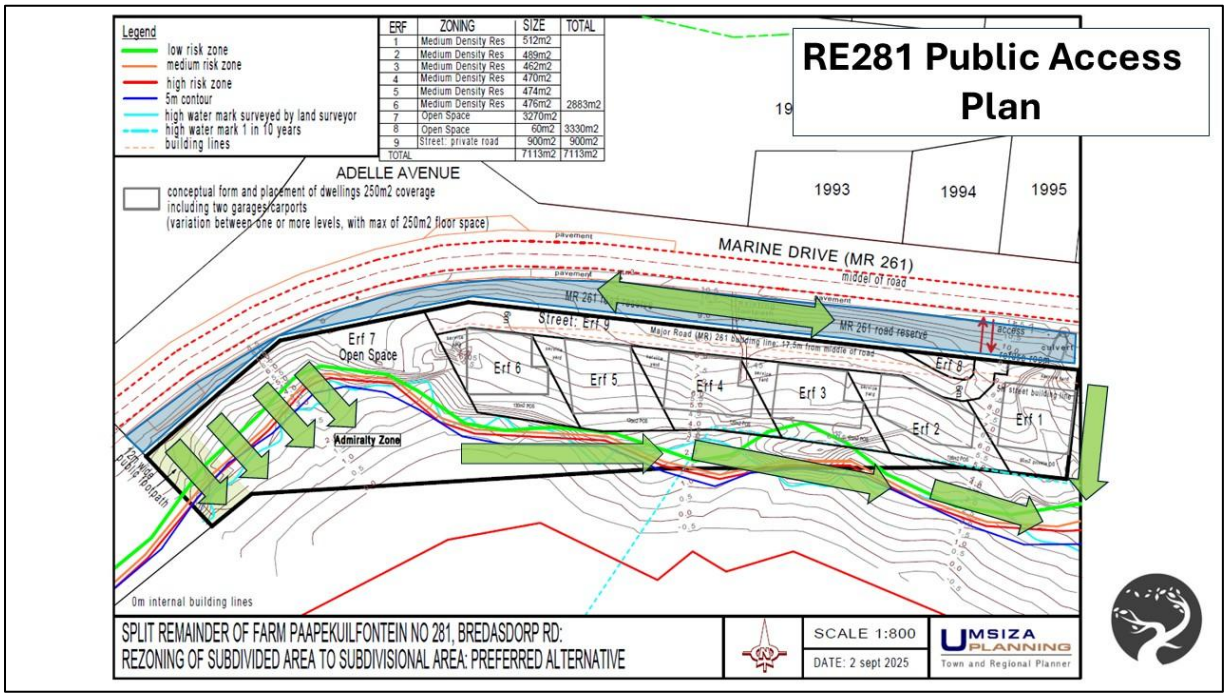
In the current preferred layout (Alternative 5), this issue has been rectified through the reclassification of the previously private open space (Erf 8) as Admiralty Zone and encouraging public access to the beachfront and ensuring full compliance with ICMA principles relating to coastal access, equity, and the protection of coastal public property. All proposed building footprints are located landward of demarcated risk zones and outside areas of high coastal hazard.

Public Access to Coastal Public Property

Public access to the coastal zone has been a primary consideration throughout the design and review of the proposed development. The applicant has proactively addressed concerns regarding historical access routes and the potential restriction of reasonable public access.

A dedicated public footpath will be provided via the proposed Open Space Erf 7 on the western portion of the site, ensuring direct and safe pedestrian access to the coastal public property. This measure was acknowledged with appreciation by the Sub-Directorate: Coastal Management (SD:CM) in correspondence dated 5 March 2025.

Accordingly, the proposed development does not infringe upon Section 13 of the ICMA, as reasonable access to the coast remains unrestricted. The existing informal access on the western end of the property will be formalised and upgraded as part of the project, ensuring that residents and visitors can continue to enjoy uninterrupted coastal access. The potential for a continuous coastal pathway along the southern frontage of the erven (east–west) is being further explored to enhance connectivity and public movement along the shoreline.



Location Relative to the Coastal Management Line (CML)

The property is situated seaward of the Coastal Management Line (CML), and the project has therefore been reviewed against identified coastal risk zones, including erosion, storm surge, and sea-level rise scenarios. Following recommendations from the pre-application meeting with DEADP: Sub-Directorate Coastal Management, all risk zones have been carefully evaluated, and the development layout has been adjusted to remain as far landward as practicable within the site.

All erven and associated structures are proposed landward of the delineated low-risk zone, above the surveyed High-Water Mark, and above the 1:10-year high-water event level. This ensures the long-term resilience of the development to coastal hazards and the protection of coastal processes. Alternative 5 includes the relaxation of the rear building line to 0 m, for each proposed erf, therefore the development cannot be shifted back any more than proposed in Alternative 5. It is important to note that the subject property itself is also separated from the Marine Drive Road by the Road Reserve. The subject property therefore does not fall directly adjacent to the actual Marine Drive Road and pedestrian walkway.

Alignment with the Overberg Coastal Processes and Risk Modelling Report

The Overberg Coastal Processes and Risk Modelling Report, together with the DEA&DP Circular, informed the assessment of coastal dynamics at the site. The design considers erosion and accretion trends, stormwater runoff, and drainage management to prevent negative impacts on adjacent properties or public coastal land.

Sustainable design interventions, such as the use of permeable surfaces, green roofing, and stormwater attenuation systems, will reduce runoff volumes and flooding risk, while maintaining the natural infiltration capacity of the site. The units are set back on the erf using a 0m rear building line.

Consideration of Sections 14 and 15 of the NEM: ICMA

In accordance with Section 14, which addresses the movement of the High-Water Mark (HWM), the applicant has taken cognisance of the potential risk of property loss should the HWM migrate inland as a result of erosion or sea-

level rise. The development footprint has been set back from high-risk areas, and no hard stabilisation structures are proposed that could alter natural coastal processes. The development is also located above the 5 m contour which provide significant protection against storm surges.

In accordance with Section 15 of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008), no person, landowner, or occupier of land adjacent to the seashore or coastal public property may require an organ of state or any other person to take measures to prevent natural erosion or accretion of the coastline, unless such erosion results from an intentional act or omission by that organ of state or person. Furthermore, the Act prohibits any person from constructing, maintaining, or extending a structure on coastal public property for the purpose of preventing or promoting erosion or accretion, except where expressly authorised in terms of the Act.

The proposed development, as per the current layout (Alternative 5), fully adheres to these legislative requirements. The subject property is situated landward of the High-Water Mark (HWM) and outside the modelled coastal risk and setback zones, thereby ensuring that the development footprint does not encroach upon the littoral active zone or any coastal public property. This positioning protects both the natural coastal processes and the integrity of the proposed infrastructure.

The area seaward of the property, below the High-Water Mark, is designated as the Admiralty zone, which functions as a buffer zone to prevent development encroachment and to maintain the natural dynamics of the coastline. Accordingly, no infrastructure or permanent structures will be placed within this zone. The beach area in front of the site is characterised by a rocky outcrop, which provides natural protection against coastal processes and mitigates potential risks associated with storm surges, wave run-up, and climate change-induced events.

As part of the development design, the existing stormwater outlet that currently traverses the property will be formalised and realigned to flow around the development footprint. Stormwater management will be designed in accordance with municipal standards to mitigate erosion and flooding risks. The major system will be accommodated within the road reserve and designed to cater for the 1:100-year storm event, while the underground piped system will accommodate the 1:2-year storm event.

The attenuation volume will be calculated based on the difference between post- and pre-development flows, ensuring that the rate of discharge to the receiving environment is regulated. This approach minimises the risk of erosion and stormwater-related damage and allows for groundwater recharge within the development area. All erf and road levels will be graded to direct runoff towards the stormwater system in a controlled manner.

Stormwater from the proposed development will ultimately discharge to the sea, but only through a controlled outlet system that includes a dissipation structure, silt and debris trap, and reno mattresses at the overflow point to prevent erosion and sedimentation at the coastal interface. A similar system will be used for the realignment of the existing municipal stormwater infrastructure, ensuring compliance with coastal protection and pollution prevention principles outlined in Section 15 of the Integrated Coastal Management Act (Act No. 24 of 2008).

In terms of Section 17 of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008), the Coastal Protection Zone (CPZ) is established to ensure that land adjacent to coastal public property, or land that plays a significant role in maintaining coastal ecosystem functioning, is managed and regulated in a manner that protects the ecological integrity, natural character, and the economic, social, and aesthetic value of coastal public property.

Compliance with Section 17 of the Integrated Coastal Management Act (Act No. 24 of 2008)

In accordance with Section 17 of the National Environmental Management: Integrated Coastal Management Act (ICMA), the Coastal Protection Zone (CPZ) is established to ensure that land adjacent to coastal public property or land that plays a significant role in maintaining coastal ecosystem functioning is managed, regulated, or restricted in order to protect the ecological integrity, natural character, and economic, social, and aesthetic value of coastal public property.

The proposed residential development on Erf 281, Struisbaai, has been planned and refined to fully comply with the objectives of this section through responsible design, appropriate siting, and environmental safeguards. The proposed development area is situated landward of the modelled coastal risk zones, above the High-Water Mark (HWM), and entirely outside of the Admiralty Reserve and littoral active zone. This ensures that no portion of the development encroaches upon coastal public property or sensitive coastal ecosystems. The layout (Alternative 5) was specifically refined to ensure that all infrastructure and dwellings are located within the low-sensitivity and unclassified portions of the property, while maintaining a significant buffer from the dynamic coastal edge. By doing so, the development safeguards the natural functioning of the coastal system, allowing for natural erosion and accretion processes to occur without interference or obstruction from the built structures.

The rocky shoreline located seaward of the property provide a natural barrier against wave action and storm surges. These features play an important role in maintaining coastal stability and reducing erosion risks to inland properties. The proposed development design acknowledges and preserves these natural defence systems by avoiding any physical alteration, stabilisation, or hardening of the coastal edge, in compliance with the ICMA's requirement to maintain the natural character and integrity of coastal ecosystems. Furthermore, no structures will be constructed within the Admiralty Zone or any other area classified as coastal public property, ensuring that the development does not interfere with natural coastal processes or public access to the coastline.

The visual and aesthetic quality of the coastline will be maintained in accordance with the approved Landscape Plan and Architectural Guidelines, which provide architectural designs that complement the existing character of the underlying landscape. The proposed development is sensitively integrated with the surrounding built environment, ensuring that the scenic and open-space character of the coastal zone is not compromised. The Architectural Guidelines established for this development aim to ensure that the built environment is a well-considered, socially and environmentally responsive outcome, which respects the site and its significance within the local landscape. The dwellings are designed to sit within the landscape rather than on it, minimising the visual impact of large, singular-built forms on this unique setting. The placement of buildings is intended to be sensitive to the natural contours of the site, creating a stepped visual profile that reduces overall massing.

The dwellings will comprise various linked forms, combining landscaped flat-roof elements with a singular pitched primary form. Extensive use of natural materials, including exposed concrete, natural stone, and timber, will allow the development to age gracefully and blend with the environment, thereby reducing visual impact and ensuring harmony with the surrounding landscape.

Please see **Appendix K** for legal opinion relating to the proposed development and ICMA.

3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.

N/A

3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.

The property lies within the Coastal Protection Zone ("CPZ") as defined in Section 16 of the National Environmental Management: Integrated Coastal Management Act, 2008 ("ICMA"). The property is located seaward of the Overberg District Coastal Management Line ("CML") but remains within the urban edge of Struisbaai, as demarcated by the Cape Agulhas Spatial Development Framework (2022–2027).

The applicant reviewed and adapted the development proposal against the coastal risk zones including erosion, storm surge and sea-level rise projections. At a pre-application meeting, DEA&DP's Sub Directorate: Coastal management ("SD: CM") recommended that the applicant should ensure that the entire development should be located as far landward of the coastal risk zones as possible which the applicant adhered to. All erven, once subdivided, will be located landward above delineated "low risk zone" and the high-water mark as determined by the land surveyor, as well as above the 1:10 year high water mark.

The development will be located above the 5m contour and within a previously disturbed area forming part of the Struisbaai urban area.

The updated layout, referred to as Alternative 5, ensures that all development is located landward, outside of the modelled coastal risk zones, thereby significantly avoiding potential environmental and infrastructural risks. This layout adjustment demonstrates a proactive approach to safeguarding both the natural environment and the proposed infrastructure. It is important to note that the positioning of the housing units cannot be shifted any further inland than shown in the current preferred layout, as the area between the northern boundary of the property and Marine Drive pavement constitutes a road reserve. Consequently, no development may be accommodated beyond this boundary.

Furthermore, the importance of the Coastal Protection Zone as a critical buffer against coastal hazards and as an area of high ecological value has been a guiding principle throughout the planning process. While the entire town of Struisbaai falls within the Coastal Protection Zone, the proposed development has been designed to avoid adverse impacts on this sensitive area. By situating the development outside the identified coastal risk zones and integrating sustainable design practices, the project not only complies with regulatory requirements but also upholds the ecological integrity of the area.

In addition, the proposed development excludes any construction or infrastructure within areas below the High-Water Mark, including the littoral active zone, which is characterised by rocky shores and sandy beach terrain. The design ensures no interference with the natural functioning of these coastal systems by maintaining appropriate buffer zones and formally designating this area as an Admiralty Zone. This measure safeguards the dynamic coastal processes, protects the integrity of the shoreline, and ensures continued public access and ecological connectivity along the beachfront.

4. Biodiversity

4.1.	Were specialist studies conducted?	YES x	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		
Dr David J. McDonald – Bergwind Botanical Surveys			
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		

Systematic Conservation Planning and Biodiversity Informants

The Terrestrial Biodiversity Impact Assessment relied extensively on systematic conservation planning tools, particularly the Western Cape Biodiversity Spatial Plan (WCBSP, 2017 and 2023) and the South African Vegetation Map (2024). The WCBSP (2017) was initially used, as both the project and the specialist botanical assessment were commissioned prior to the release of the updated 2023 WCBSP. Under the 2017 WCBSP, the Western portion of the site was mapped as an Ecological Support Area 1 (ESA1), while the Eastern portion was mapped as Other Natural Areas (ONA) and the remainder was unclassified. This distinction informed the development layout design (Alternative 5), which largely avoids the ESA1 area and instead utilises the lower sensitivity areas mapped as ONA or unclassified.

However, the updated WCBSP (2023) reclassified parts of the site as Critical Biodiversity Area 1 (CBA1) and ESA1, reflecting the presence of threatened Southwestern Strandveld vegetation and its role in supporting coastal ecological processes and connectivity. Additionally, the remainder of the site is unclassified and therefore not sensitive, indicating areas of lower biodiversity significance.

The National Spatial Biodiversity Assessment (NSBA, 2018) and the National Freshwater Ecosystem Priority Areas (NFEPA, 2011) datasets were also consulted. The NSBA confirms Agulhas Limestone Fynbos as critically endangered, and Southwestern Strandveld as Endangered vegetation types. NFEPA mapping confirmed that there are no freshwater ecosystems or priority wetlands directly on the site, although proximity to the coast highlighted the importance of consideration of stormwater management design to avoid secondary impacts on marine systems, which have been taken into consideration in the preferred layout.

Vegetation and Plant Species Findings

The Botanical Assessment confirmed that the property supports two vegetation types, as identified in the South African Vegetation Map (SANBI, 2024). The western portion of the property is mapped as Agulhas Limestone Fynbos, classified as Critically Endangered, while the eastern portion, where most of the proposed development footprint is located, is mapped as Southwestern Strandveld, which is listed as Endangered. Both of these ecosystems are formally recognised under the National Environmental Management: Biodiversity Act (NEMBA) and are considered important for regional biodiversity conservation. In addition, the national web-based Screening Tool classified the site as Very High sensitivity for the Terrestrial Biodiversity Theme and Medium sensitivity for the Plant Species Theme, owing to the presence of potentially sensitive features as well as the likelihood of plant species of conservation concern occurring on the property.

Terrestrial Biodiversity Sensitivity

The site has been classified as Very High sensitivity for the Terrestrial Biodiversity Theme. However, the specialist challenges this rating based on the site evaluation, suggesting that a Medium sensitivity classification is more appropriate. The ESA1 designation and other sensitivity features, in the specialist's view, do not justify a High or Very High classification.

Field verification during the site survey indicated that the Agulhas Limestone Fynbos is only weakly represented on the property. This vegetation type relies on fire as a key ecological driver for plant rejuvenation. Due to the site's coastal location, fragmentation from surrounding landholdings, and limited likelihood of fire occurrence, the fynbos is not expected to thrive.

On the other hand, the Southwestern Strandveld is more dominant across the property, particularly in the Eastern portion, although it is subject to varying levels of disturbance. Therefore, Strandveld plant species stay relatively

stable without fire and that most of plants do not rejuvenate by sprouting but rather by seed, should a fire occur. In general, the vegetation cover is moderately degraded due to past activities but still retains many of the characteristic Strandveld species.

Ecological processes on the site are closely linked to its coastal location, with most plants adapted to the salty, windy environment. Apart from the coastal vegetation, some of which has been degraded by human activities, the habitat was generally found to be in poor condition. Stormwater discharge from culverts below the coastal road has disturbed the sandy soils (**Photo 2**); where erosion has occurred, natural revegetation takes place but at a slow rate.

Plants Species Sensitivity

Plant species sensitivity is considered Low across most of the site, with Medium sensitivity assigned to the western end of the property, as this aligns with both the Western Cape Biodiversity Spatial Plan (WCBSP, 2017) classification and map, as well as the Red List Ecosystem classification and map. In all cases, the western portion of the site, where the beach is located, is more sensitive than the remainder of the property. The site does not support typical 'dune strandveld' due to its topography, resulting in a vegetation structure and species composition that is somewhat less complex than the typical form of dune strandveld.

The plant species recorded during the field assessment included a range of typical Strandveld shrubs and succulents, such as Rhus (Searsia) species*, Euclea racemosa, Olea exasperata, Chrysanthemoides monilifera, Metalasia muricata, Limonium scabrum* (sea lavender), and *Drosanthemum hispidum*, together with groundcovers and bulbs adapted to coastal conditions. The Botanical specialist noted that the vegetation on site is a poor representation of Southwestern Strandveld, displaying relatively low species richness. Many of the species recorded are more characteristic of fynbos than of Strandveld, rendering the vegetation assemblage somewhat atypical.

Although National Environmental Screening Tool indicated the potential presence of several Species of Conservation Concern, none were observed directly on site. The specialist concluded that, while the property does not host viable populations of Red Data or threatened plant species, the vegetation nevertheless contributes to the broader ecological network of the coastal strip.

The survey also noted the presence of invasive alien plants in some portions of the site, particularly *Acacia cyclops* (rooikrans), *Plantago maritima* (sea plantain), *Reseda lutea* (yellow mignonette or wild mignonette), which has spread into the more disturbed areas. Although their presence reflects past land-use impacts, these invasive plants reduce the ecological integrity of the natural vegetation and should be removed as part of site rehabilitation and development management.

Influence on Development Proposal

The integration of vegetation mapping, species-level assessments, and Systematic Conservation planning tools has directly shaped the design of the proposed development. By excluding the more sensitive western portion of the site from development and designating it as open space, the proposal ensures that the Critically Endangered Agulhas Limestone Fynbos and portions of Endangered Southwestern Strandveld are retained. The Eastern portion of the site, which is more disturbed and contains a higher prevalence of invasive alien plants, has been identified as more suitable for the residential erven and service infrastructure.

As a result, the proposed development footprint is focused on less sensitive areas while maintaining ecological connectivity and protecting coastal processes. The specialist concluded that, with these design refinements and

the implementation of mitigation measures such as alien plant removal and ongoing open space management, the development will result in a low negative residual impact and does not trigger the need for a biodiversity offset.

The small portion where the Agulhas Limestone Fynbos vegetation type is mapped does not contain well-developed examples of the community and has been excluded from the development footprint. A formal walkway is, however, proposed in parts of the western portion of the site. It is important to note that this area has already been impacted by an existing informal path, and the proposed intervention will focus on formalising the walkway rather than disturbing intact vegetation.

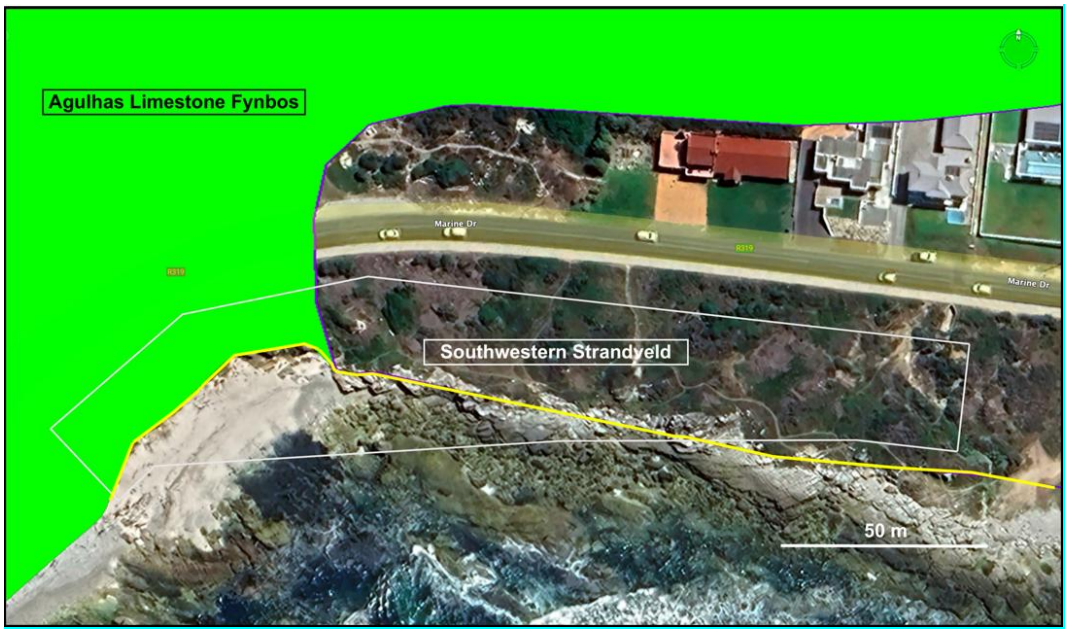


Figure 11: Portion of the vegetation map (VEGMAP) (SANBI, 2024) indicating that the site is mostly within Southwestern Strandveld (northwards of the yellow line). Cape Seashore Vegetation is not shown, with Agulhas Limestone Fynbos occurring at the western end of the site. (*source*: McDonald, 2023).

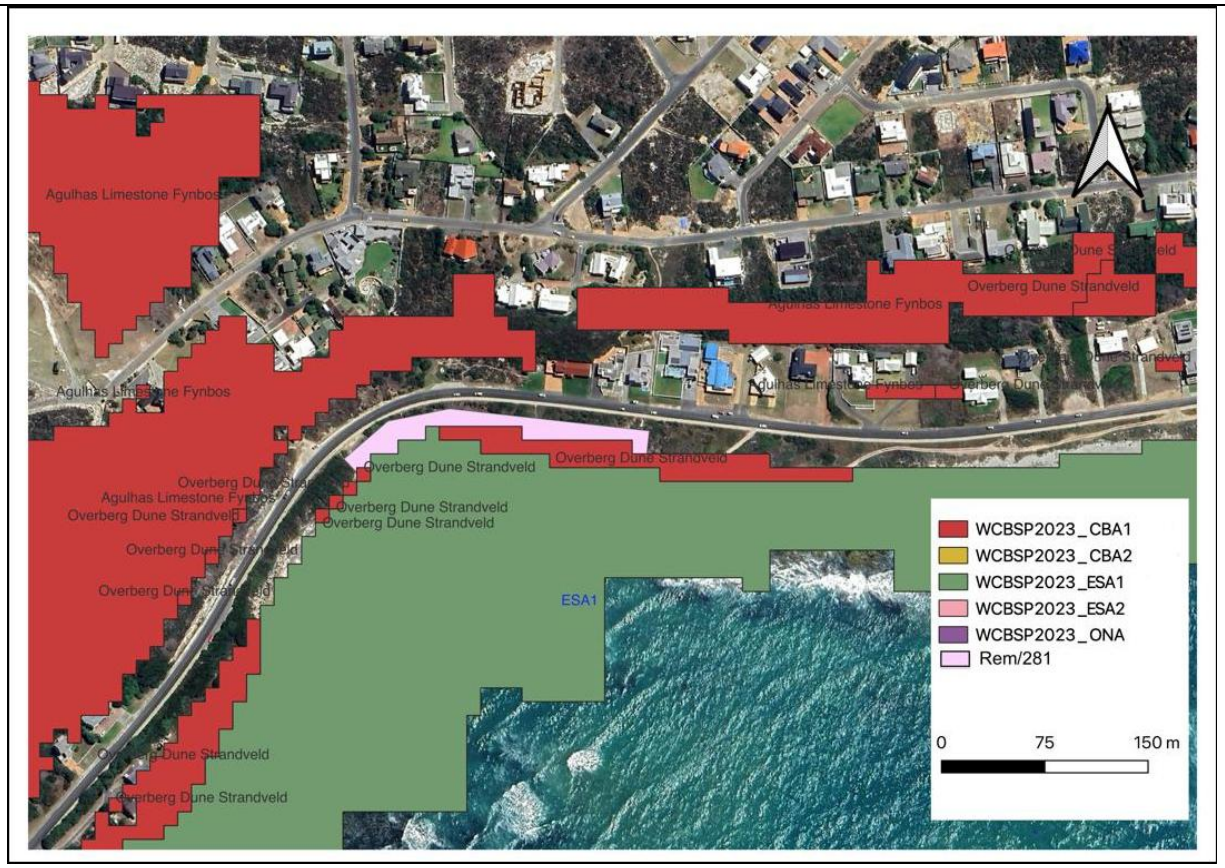


Figure 12: The WCBSP map (CapeNature, 2023) overlaid on a Google Earth Pro ™ image, indicating that the western part of the site is classified as ESA1 (green shading) and the central and east parts of the site on the seaward side are classified as CBA1 (red shading). The rest of the site is classified as not sensitive at all (pink shading). *Source*; (McDonald, 2025).

Figure 13: WCBSP, (2017) showing areas mapped as ESA1 and ONA onsite.

Photo 1. The east boundary of the site runs from Marine Drive to the shoreline, roughly in a straight line through the habitat seen in this image (McDonald, 2023)

Photo 2. The view Westwards from the Eastern boundary of the site showing the rocky promontory above the rocky coastline. The vegetation is all Strandveld (McDonald, 2023).

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

The WCBSP (2017) was initially used, as both the project and the specialist Botanical Assessment were commissioned prior to the release of the updated 2023 WCBSP. Under the 2017 WCBSP, the Western portion of the site was mapped as an Ecological Support Area 1 (ESA1), while the eastern portion was mapped as Other Natural Areas (ONA) and the remainder was unclassified (**Figure 13**). This distinction informed the development layout design (Alternative 5), which largely avoids the ESA1 area and instead utilises the lower sensitivity areas mapped as ONA or unclassified.

However, the updated WCBSP (2023) reclassified parts of the site as Critical Biodiversity Area 1 (CBA1) and ESA1, reflecting the presence of Endangered Southwestern Strandveld vegetation and its role in supporting coastal ecological processes and connectivity. Additionally, the remainder of the site is unclassified and therefore not sensitive, indicating areas of lower biodiversity significance.

The preferred layout alternative takes this classification into careful consideration. To align with the objectives and management guidelines of the WCBSP (2017), the proposed development has been designed to avoid encroachment on the ESA1 area as far as practicable but maintain public access on this boundary. Bulk infrastructure, including roads, utilities, and services, are planned for the Eastern portion of the property, which lies outside the ESA1 classification. This ensures minimal disturbance to sensitive ecological areas. The risk of the development onsite due to the condition of the vegetation type occurring onsite is deemed to be of low impact risk.

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

Extracted from Terrestrial Biodiversity Impact Assessment:

Plant Species Sensitivity

Plant species sensitivity is Low for most of the site and Medium for the western end of the site. This agrees with both the WCBSP classification and map and the Red List Ecosystem classification and map, where in all cases the western end of the site, where the beach is located, is more sensitive than the remainder.

No plant species of conservation concern (SCC), also known as Red List species (Raimondo et al. 2009) were encountered on the site.

Ecological Processes

Ecological processes on the site are closely linked to the proximity of the sea. In addition, release of stormwater onto the site has caused some disruption of the soil. Revegetation is occurring naturally but is very slow.

Unlike in fynbos, Strandveld does not rely on fire as one of the important ecological drivers. The Strandveld plant communities stay relatively stable without fire and most of the plants do not rejuvenate by resprouting but rather by seed should a fire occur.

The site at Struisbaai is not typical 'Dune Strandveld' due to its topography so its structure and plant species composition is somewhat less complex than in the typical form of Dune Strandveld. In addition, there is very little activity of animal biota on the site, probably due to the limited cover and food resources offered by the vegetation. This is another reason for saying that the terrestrial biodiversity sensitivity should be Medium at the most.

Terrestrial Biodiversity Sensitivity

According to the botanical specialist findings, the screening tool identifies the site as High to Very High sensitivity, however, the specialist disputes this and alludes that the terrestrial biodiversity of the site should not be classified more than medium sensitivity and that the ESA1 classification as well as the other sensitivity features do not warrant application of a High to Very High classification.

No bird species were observed during the site visit. In addition no insect communities were evident in the dune Strandveld habitat either.

Direct impact

There would be almost total loss of the Strandveld vegetation on the site, whereas the Agulhas Limestone Fynbos at the western end of the site with the beach and a limited area of Cape Seashore Vegetation would remain intact. The impact at the local level of the site is thus Low Negative since the development footprint would only affect the Strandveld from the boundary with the Agulhas Limestone Fynbos eastwards to the eastern boundary of the site. The latter area is classified as being of least concern by both the Western Cape Biodiversity Spatial Plan (see Figure 12 of the botanical specialist) and the Red Listed Ecosystem analysis (see Figure 13 of the Botanical Report).

The main concern in terms of cumulative impacts would be the loss of Southwestern Strandveld as a vegetation type. However, the site is 0.71 ha, at least a third of which is exposed bedrock and beach, leaving less than 0.5 ha that is true Strandveld or Agulhas Limestone Fynbos. Therefore, although there would be total loss of the vegetation on the eastern part of the site, this loss would not be great over the extent of the vegetation type as a whole, so cumulative impacts would be Low Negative.

Extracted from Terrestrial Biodiversity Impact Assessment:

Faunal impact

The faunal assessment for RE281, Struisbaai, indicates that the site is of low terrestrial animal sensitivity in terms of the Gazetted Terrestrial Animal Species Protocol (2020). Field surveys and desktop analyses confirm that no Species of Conservation Concern (SCC) are likely to be significantly impacted by the proposed development, although the surrounding coastal environment supports important habitats for species such as the African Black Oystercatcher (*Haematopus moquini*) and several mammal and bird species. The development footprint does not overlap with critical breeding or foraging sites, and suitable habitat within the site is limited.

Coastal Impact

The proposed Spookdraai Residential Development is located within the Coastal Protection Zone (CPZ) as defined by the National Environmental Management: Integrated Coastal Management Act (Act 24 of 2008). According to the 2017 Western Cape Biodiversity Spatial Plan (BSP), the area below the High-Water Mark as well as the western boundary of the property are classified as an Ecological Support Area 1 (ESA1) due to the presence of Agulhas Limestone Fynbos, a vegetation type of medium ecological sensitivity. The remaining sections of the site are mapped as Other Natural Areas and No Natural, reflecting previous disturbance and limited ecological function.

The coastal strip below the High-Water Mark plays an important role in maintaining coastal ecosystem function, including wave energy dissipation, sediment movement, storm-surge buffering, and biodiversity connectivity between marine and terrestrial systems. To protect these functions, the preferred layout (Alternative 5) has been designed to avoid all development within the ESA1, with the residential footprint shifted more than 3 m inland and positioned outside the delineated coastal risk and storm-surge zones. The entire area below the High-Water Mark has been designated as Admiralty Zone , thereby preventing hard infrastructure within sensitive coastal zones and allowing natural coastal processes to continue unhindered.

A formal public walkway is proposed along a previously disturbed area to maintain coastal access without additional vegetation clearance. This measure ensures compliance with ICMA provisions related to public access and coastal public property, while reducing potential disturbance to dune and shoreline habitats.

Overall, the proposed development will have a **low residual impact** on the coastal environment. The revised layout maintains the integrity and functionality of the coastal system, safeguards ecological processes, and aligns with the objectives of the BSP (2024), ICMA, and the precautionary principle for sustainable coastal development.

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

N/A - The subject property is not located in a protected area.

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

Terrestrial Animal Site Sensitivity Verification Report and Compliance Statement

According to the National web-based Screening Tool, the site has been identified as having a Medium Animal species sensitivity associated with the likelihood presence of two animal species of conservation concern. This includes a reptile species, *Bitis armata* (Southern Adder) and an invertebrate species, *Aneuryphymus montanus* (Yellow winged grasshopper). Both of these species are classified as being Vulnerable. One additional species,

African Oystercatcher (*haematopus moquini*), was flagged by Cape Nature, which is also assessed by the Faunal specialist.

The faunal specialist confirmed the presence of four distinct habitat types within the study area (see **Figure 14**). These include Strandveld, Seashore vegetation, a Seep, and Sand beach with rocky shores (**Figure 15 – 18**). All of these habitats show varying levels of disturbance, primarily due to human activities such as the creation of informal footpaths. Occasional patches of alien invasive vegetation were also noted within these habitats, further contributing to their altered state.

A range of faunal species was observed across these habitats during the site assessment. Bird species were the most prominent and were largely associated with the Strandveld habitat, where the highest level of diversity was recorded. Reptile species were found in both the seashore vegetation and the sandy beach/rocky shore areas. A single amphibian species was recorded, while several mammal species were observed in the Strandveld. Invertebrate species were also present throughout the site, with the majority recorded in the Strandveld habitat.

Of the three animal species of conservation concern, two of which were identified by the National Screening Tool and the third flagged by Cape Nature, none were recorded on site during the faunal survey. The faunal assessment for RE281, Struisbaai, indicates that the site is of low Terrestrial Animal sensitivity in terms of the Gazetted Terrestrial Animal Species Protocol (2020). Field surveys and desktop analyses confirm that no Species of Conservation Concern (SCC) are likely to be significantly impacted by the proposed development, although the surrounding coastal environment supports important habitats for species such as the African Black Oystercatcher (*Haematopus moquini*) and several mammal and bird species. The development footprint does not overlap with critical breeding or foraging sites, and suitable habitat within the site is limited. Nevertheless, precautionary measures have been recommended to minimise disturbance to local fauna, particularly during sensitive breeding periods. Implementation of these measures, together with ongoing environmental management during construction, will ensure compliance with legislative requirements and alignment with biodiversity best practice guidelines.

Figure 14: The four different habitat types relevant for fauna in the property.

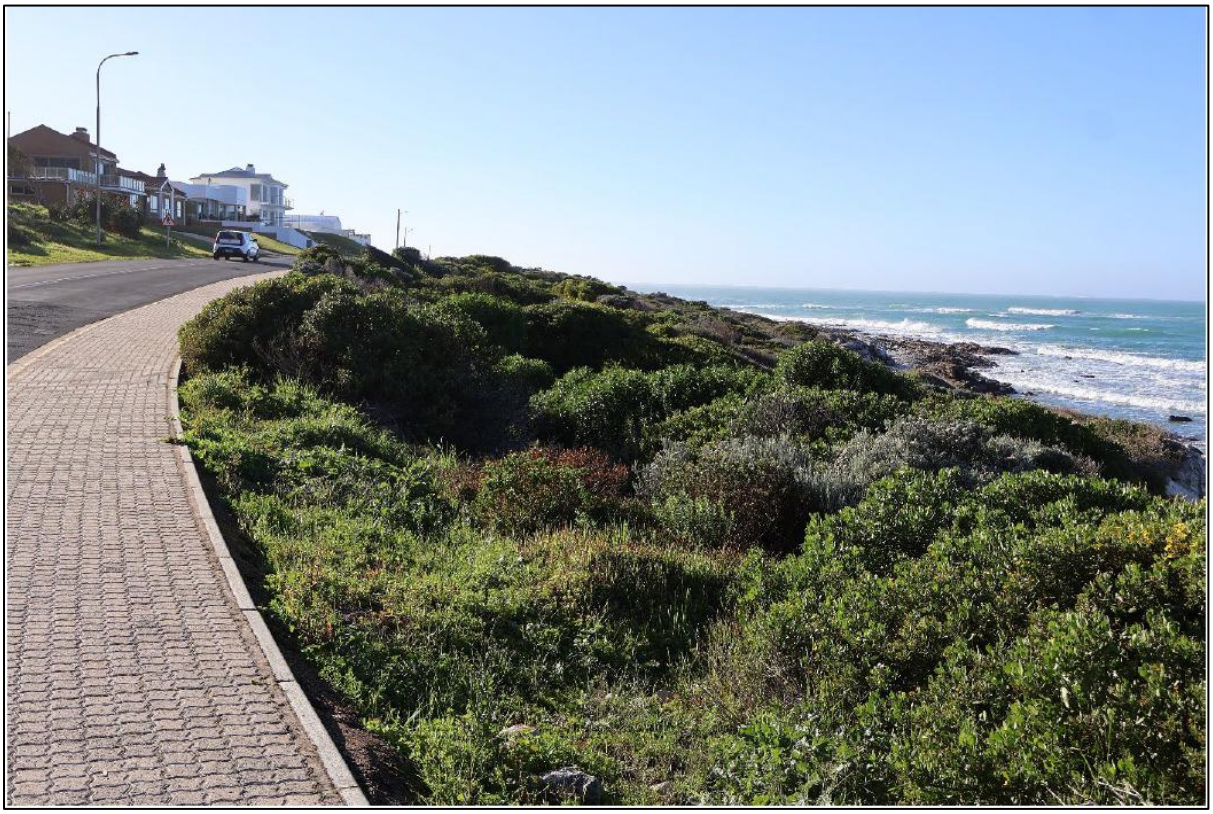


Figure 15: A typical example of the Strandveld habitat vegetation.

Figure 16: An example of the seashore vegetation visible here at the edge of the sandy beach.

Figure 17: An example of the rocky shore habitat alongside the site.

Figure 18: The stormwater area that transect the Strandveld habitat type.

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.
The impact of the proposed development relates to the transformation of the land that is currently covered with indigenous vegetation to the landscape which will be transformed and built. The desirability from a development perspective relates to the proximity of the erf to the coast and as such the relevant coastal legislation has been consulted and the design has been shaped around these factors.

6. Heritage Resources

6.1.	Was a specialist study conducted?	YES x	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
Cindy Postlethwayt – Heritage Impact Assessment John Pether – Palaeontological Impact Assessment Jonathan Kaplin – Agency for Cultural Resource Management (ACRM) – Archaeological Impact Assessment Terra + Landscape Architects – Visual Impact Assessment			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		

Heritage Impact Assessment

Heritage Context and Landscape Sensitivity

The HIA established that the site forms part of a broader cultural landscape of the Agulhas coastal region, recognised for its historic fishing villages, maritime traditions, and scenic coastal vistas that contribute to the area's strong sense of place. The visual and cultural connection between the dune systems, open coastal areas, and historic settlement patterns is considered a heritage resource in itself. The site lies along a prominent coastal ridge with open views toward the sea, making it visually exposed and integral to the historic character of Struisbaai' s seafront environment.

To respect this setting, the development plan was refined to ensure that built structures are visually recessive, restricted to the inland portion of the property, and excluded from visually prominent ridgelines and raised areas. The western portion of the site, which offers long uninterrupted coastal views and contributes to the open scenic quality, has been excluded from development and designated as Open Space for General Public access, ensuring the preservation of the visual and cultural landscape.

Archaeological Resources

An Archaeological Impact Assessment (AIA) was undertaken by Jonathan Kaplan (2024). The study provides an overview of the archaeological context of the broader Agulhas region and an assessment of the potential heritage significance of the proposed development site.

Archaeological evidence indicates that the Agulhas region has been occupied for well over a million years, with a long record of human settlement and activity reflected in the distribution of Early Stone Age (ESA) and Middle Stone Age (MSA) tools found locally. Numerous Later Stone Age (LSA) shell middens have been documented in the wider area, particularly within Cape Agulhas, Suiderstrand, and the Agulhas National Park, attesting to intensive coastal resource use during prehistoric times.

A search of the South African Heritage Resources Information System (SAHRIS) identified a small number of commercial Cultural Resource Management (CRM) surveys previously undertaken in Struisbaai. These studies indicate that the rocky shoreline between Struisbaai and Cape Agulhas is rich in archaeological resources, including extensive shell middens, while the northern areas, where the shoreline transitions into long sandy beaches, have yielded relatively few archaeological remains. Limited traces of shellfish and isolated flakes have been recorded in the back-dune areas near Die Plaat and on limestone outcrops north of the Langezandt development, while additional finds such as isolated stone flakes and pottery fragments were recorded inland near Andrews Airfield.

The AIA further notes the presence of colonial-period middens associated with the historic settlement at Hotagterklip, situated along the main approach to Struisbaai. The broader Cape Agulhas coastline is also well known for its large number of well-preserved tidal fish traps (visvywers) constructed within the intertidal zone, which are visible at low tide and identifiable on satellite imagery. These features are of significant cultural and heritage value, providing important insights into traditional coastal subsistence practices

During the field survey conducted as part of the Archaeological Impact Assessment (Kaplan, 2023), a limited number of archaeological heritage traces were recorded within and adjacent to the proposed development site (refer to Figure 30 and Table 1 in the AIA report). These finds were generally sparse, highly weathered, and of low archaeological significance.

Fragments of marine shellfish, primarily *Turbo sarmaticus* (alikreukel) and *Scutellastra longicosta* (limpet), together with a flaked quartz chunk and a limestone flake (Sites 152–182), were identified along the existing coastal footpath that runs adjacent to the rocky shoreline. Additional traces of *Turbo sarmaticus* shell fragments were observed in small windblown sand patches on the vegetated slopes above the coastal track (Sites 192, 212, and 222). A few fragments of weathered shellfish and several broken beach cobbles were also recorded on the elevated rocky shelf at the end of a small sandy beach (Site 142).

A small number of isolated shell fragments were observed in the sidewall of a sandy donga; however, no clear anthropogenic material or cultural association was identified at this location. Importantly, no organic archaeological materials such as pottery, bone, or ostrich eggshell fragments were recovered during the field investigation.

The findings indicate a low-density scatter of weathered shellfish remains and isolated lithic fragments, consistent with background archaeological material typical of coastal environments that have experienced natural reworking and erosion. No formal archaeological sites, features, or deposits of high heritage significance were identified within the proposed development footprint. As such, the archaeological sensitivity of the site is assessed as low, and the proposed development is unlikely to result in any adverse impacts on archaeological resources.

To prevent potential disturbance of unrecorded archaeological material, the development footprint was adjusted inland, avoiding the dune fringe areas considered to have higher archaeological potential. The HIA further recommended a Chance Finds Procedure to be implemented during construction, requiring immediate cessation of work and notification of Heritage Western Cape (HWC) should any heritage artefacts, burials, or middens be uncovered.

Palaeontological and Archaeological Resources:

The palaeontological sensitivity of the Peninsula Fm. bedrock is rated High, but the proposed small development is not expected to significantly impact the trace fossil content which might be preserved in the folded and deformed strata beneath the surficial sands.

The Klein Brak Fm. raised beach deposits typically consist of shelly sands and rounded gravels. In open-coast settings these Quaternary “raised beach” deposits include a fossil shell fauna which is mainly comprised of extant (living) species which are common today and which are not paleontologically sensitive. In addition to fossil shells, scattered fossil bones such as from whales, dolphins, seals and seabirds may occur in the deposits but are generally very rare. These are not likely to be extinct species, but species beyond their modern- day ranges may occur. A Low sensitivity may be assigned to the raised beach deposits. The thin traces of shellfish, very few artefactual remains, and no visible cultural items such as pottery means that the archaeological remains have been graded as having Low (lllC) local significance.

Graves and burial grounds:

No burial sites are known to have been found on the site.

Sites of significance relating to the history of slavery:

Although there are historical associations with an early colonial farm which would undoubtedly have utilised slave labour, this property is part of the last remaining extent of the farm post the last 2013 subdivisions. It is thus not regarded as being likely to have any direct or easily traceable associations with slavery.

Visual Impact

Visual and Aesthetic Sensitivity

The Visual Impact Assessment (VIA) integrated with the HIA, confirmed that the coastal edge and elevated dune areas possess high visual sensitivity due to their visibility from Marine Drive, the beach, and public viewpoints. The initial development alternatives were considered likely to introduce visual intrusion and alter the character of the coastal landscape.

In response, the preferred layout (Alternative 5) reduced the development density and clustered units inland, creating a lower building profile that integrates more sympathetically with the surrounding environment. The introduction of landscaping buffers using indigenous vegetation, permeable boundary treatments, and earth-toned architectural finishes further mitigates visual impacts. These design refinements maintain the coastal character and sense of openness that are integral to the heritage and aesthetic value of Struisbaai.

Influence on the Site Development Plan

The integration of Heritage, Archaeological, and Visual Sensitivity findings has had a defining influence on the final Site Development Plan:

- → The Western coastal section (medium to high visual and archaeological sensitivity) was excluded from development and preserved as Open Space.
- → The residential footprint was repositioned inland to align with the existing urban edge and to respect the heritage landscape setting.
- → Design controls were incorporated, including height limitations, use of natural materials and colours, and vegetation buffers to maintain scenic continuity.
- → Public access via Erf 7 was formalised, retaining the historic relationship between the town and the coast.

Palaeontological Impact Assessment

Affected Formations

According to Pether, (2023) the proposed development site consists of the wave eroded bedrock quartzites of the Peninsula Formation. The specialist then highlights that the overlying deposits are not very thick and are expected to include raised beach deposits of the Klein Brak Fm. and windblown sands of the Strandveld Fm.

Accepting that the aeolianite exposed along the Spookdraai is of MIS 6 age (~180-160 ka) and post-dates the older MIS 11 high sea level (Figure 6), the LIG high sea level (5-6 m asl.) might have occupied the bedrock beneath the Project Area, with shoreline cliffs of aeolianite. However, it is also possible that the area remained covered by the Waenhuiskrans Fm. aeolianite during LIG times, with the cliffed shoreline situated to the seaward of the Project Area, as seen at other coastal localities where the LIG raised beach deposits are absent and pre-LIG aeolianites are cliffed along the modern shoreline.

The Holocene High (~3 m asl., about 7 ka) would have impinged on the Project Area strip which very likely was inundated during storm surges, with deposition of “stormbeach” deposits above the highwater mark. Reworked marine sands of the aeolian Strandveld Fm. occupy the surface.

Anticipated impacts on Palaeontological Resources

The palaeontological sensitivity of the Peninsula Fm. bedrock is rated HIGH , but the proposed small development is not expected to significantly impact the trace fossil content which might be preserved in the folded and deformed strata beneath the surficial sands. The Peninsula Fm. occurs extensively throughout the Cape Fold Belt.

The Klein Brak Fm. raised beach deposits typically consist of shelly sands and rounded gravels. In open-coast settings these Quaternary "raised beach" deposits include a fossil shell fauna which is mainly comprised of extant (living) species which are common today. In sheltered bay, estuarine and lagoonal settings, where warm-water conditions pertained locally, the deposits may also include a few tropical species of both West African and Indo-Pacific origin that no longer occur along the coast today, as well as a small number of extinct species. The shells present in the sheltered, warmer setting are known as the "Swartkops Fauna", from that estuary near Port Elizabeth. In addition to fossil shells, scattered fossil bones such as from whales, dolphins, seals and seabirds may occur in the deposits, but are generally very rare. These are not likely to be extinct species, but species beyond their modern-day ranges may occur.

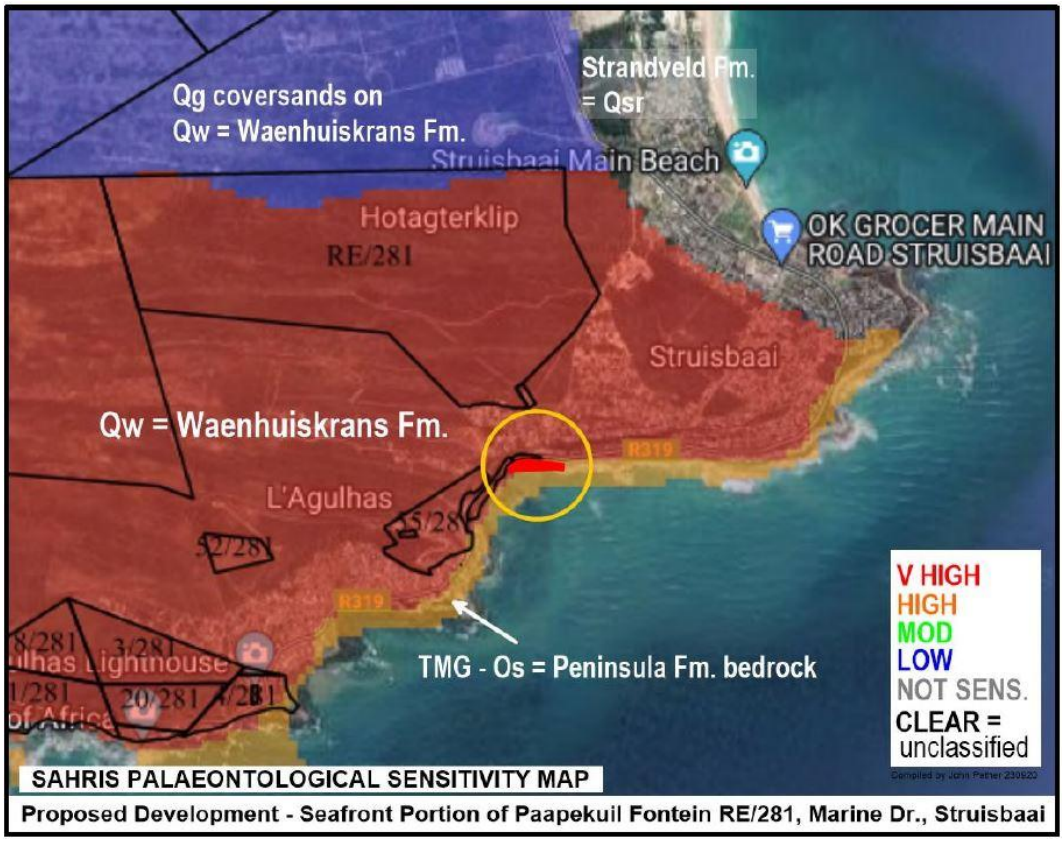


Figure 19: Palaeontological sensitivities of formations in the Struisbaai area.

The Klein Brak Fm. is not rated on the SAHRIS palaeontological sensitivity map but is assigned CLEAR/Unclassified. It is suspected that beach deposits beneath the site are likely to be of Holocene age. Due to the open coast setting of the Project Area a LOW sensitivity may be assigned to the raised beach deposits. The marine sands have been eroded and wind-reworked to form a thin coversand equivalent to the Strandveld Fm. (also unclassified, Figure 8) Fossil material such as marine shells and bones in these sands are likely to be in an archaeological context. Any "subfossil" bones are expected to be of the extant fauna and a LOW sensitivity may be assigned to the aeolian coversands.

In summary, both the beach deposits and aeolian coversands of the Project Area are accorded LOW palaeontological sensitivity and in the impact assessment are considered together. The intensity or magnitude of impact relates to the palaeontological sensitivities of the affected formations (Appendix 1 of the Palaeontological Impact Assessment) and the volume of disturbance by excavations. A typical conventional housing development entails trenches for foundations (~0.6 m depth) and services infrastructure (up to ~1.2 m depth) and will primarily affect the coversands and will probably intersect the beach deposits in places. In view of the vulnerability of the

proposed seashore development to infrequent, but damaging storm surges it is possible that alternative structures may be built, such as plinth and girder construction which may involve less subsurface impact.

Note that the prime concern is for land and marine animal bones and archaeological material. The shell content in the Holocene raised beach deposits is not paleontologically sensitive.

Archaeological Impact Assessment

According to Kaplan, (2024) studies have shown that people have occupied the Agulhas region for well over a million years. Middle Stone Age (MSA) and Early Stone Age (ESA) tools occur locally, while large numbers of Later Stone Age (LSA) shell middens have been recorded in Cape Agulhas, Suiderstrand and Agulhas National Park (Hall 1984; Kaplan 1993, 1997a, b, 1998a, b, 1999a, b, 2001, 2003a, 2006, 2007; Nilssen 2004).

A search of SAHRIS has shown that a handful of commercial CRM surveys have been conducted in Struisbaai. The rocky shoreline between Struisbaai and Cape Agulhas is rich in archaeological resources such as shell middens (Kaplan 2008, 1993), while few remains have been recorded north of the village, where the shoreline forms a long sandy beach. Traces of shellfish have been recorded in the back dune area near Die Plaat, and on some limestone bedrock north of the Langezandt housing development (Hart & Halkett 1995; Kaplan 2003b). A few isolated flakes have also been recorded in Struisbaai North, and near the Caravan Park (Kaplan 2020, 2016a,b), while isolated stone flakes and some pottery was recorded inland of the coast at Andrews Airfield (Kaplan 2021). Colonial period middens associated with the historic settlement at Hotagterklip alongside as one enters Struisbaai have also been recorded (Hart & Halkett 1995).

Cape Agulhas is, probably best known for the large number of well-preserved tidal fish traps/visvywers that occur in the intertidal zone, which are visible at low tide, and on Google Earth satellite imagery. For many years archaeologists have assumed that these stone walled `dams' built in gullies or low energy bays originated among LSA hunter-gatherers who lived on the coast after 3000 years ago (Avery 1975; Goodwin 1946; Gribble 2005). But research conducted by the archaeologist Philip Hine (2008), has shown that most, if not all of these stone built fish traps, were constructed by poor whites (bywoners) in the late 1800s and early 1900s, who rented properties from absent farmers at the time.

Site Visit Results

Specialist findings indicates that there are a few traces of archaeological heritage resources recorded during the field survey.

Fragments of weathered marine shellfish (mostly *Turbo sarmaticus* / alikreukel & some limpet / *Scutellastra longicosta*), a flaked quartz chunk, and a limestone flake were recorded in the coastal footpath that runs alongside the rocky shoreline .

Traces of shellfish (*Turbo sarmaticus*) were also recorded in a few open patches of windblown sand on the vegetated slopes above the coastal track).

A few fragments of weathered shellfish and several broken beach cobbles were recorded on the elevated rocky shelf at the end of the small sandy beach.

A few isolated fragments of shellfish were noted in the side wall of the sandy donga (refer to Figure 6), but no anthropogenic remains were noted.

No organic remains such as pottery, bone or ostrich eggshell were found.

Figure 20: Waypoints of archaeological remains and Track paths in blue. (Kaplan, 2023)

Table 2: Spreadsheet of waypoints and description of archaeological resources

GPS Point	Name of Farm	Lat/long	Description of finds	Grading	Mitigation
	Farm 281 – Re seafront				
142		S34° 48.819' E20° 01.841'	A few weathered fragments of shellfish & several broken cobbles and chunks on rock ledge	IIIC	None required
152		S34° 48.823' E20° 01.869'	Traces of weathered shellfish alongside coastal foot path	IIIC	None required
162		S34° 48.823' E20° 01.875'	Traces of weathered shellfish, + flaked quartz chunk alongside coastal footpath	IIIC	None required
172		S34° 48.824' E20° 01.881'	Traces of weathered shellfish on sandy slope	IIIC	None required
182		S34° 48.826' E20° 01.883'	A few fragments of shellfish + limestone flake alongside coastal footpath	IIIC	None required
192		S34° 48.820' E20° 01.909'	A few fragments of weathered shellfish on sandy slope	IIIC	None required
222		S34° 48.823' E20° 01.938'	A few fragments of weathered shellfish on eroded sandy slope	IIIC	None required
212		S34° 48.830' E20° 01.958'	Fragments of shellfish on patch of sand outside footprint area	IIIC	None required

Photo 3: Site 152 view facing east. Kaplan, (2023)

Photo 4: Site 162. View facing east.

Photo 5: Site 182. View facing east. Kaplan, (2023)

Photo 6: Site 222. Kaplan, (2023)

Photo 7: Site 212. Kaplan, (2023)

Photo 8: Site 212. Kaplan, (2023)

Impact Statement

The results of the study indicate that, a small housing development on the subject property in Struisbaai, will likely not impact on important Stone Age archaeological heritage resources.

Visual Impact Assessment

The proposed development site is situated within a semi-rural coastal cultural landscape of high visual, and aesthetic value with a coastal character, outside the urban periphery, with important components of distinctive character, valued for tangible as well as intangible attributes. This landscape is recognised as a valuable cultural heritage resource due to its intact indigenous coastal vegetation, rugged natural character, and the expansive views across the ocean which contribute to the strong sense of place associated with this gateway location. The

site lies in a visually sensitive position on a scenic bend (Spookdraai), where the coastal edge, natural vegetation, and the continuity of the Marine Drive scenic route collectively represent an important cultural landscape layer. The Visual Impact Assessment confirmed that any development on the site would inevitably introduce a degree of visual intrusion and alter the sense of place of the coastal cultural landscape. In particular, the transformation of the site from an open, vegetated coastal edge to a built environment has the potential to affect public use and enjoyment of the coast, views of the sea, the visual experience along Marine Drive, and the broader cultural and aesthetic integrity of the setting. Given the heritage and scenic value of the landscape, the proposed development was required to respond sensitively to these constraints.

Accordingly, the development layout and design were directly influenced by the presence of these sensitive heritage resources. Significant adjustments were made to ensure that a portion of the natural coastal edge remains intact, with Admiralty zone being incorporated to retain view corridors and maintain pedestrian linkages to the coast. It is recommended that a green buffer of at least 2 m be maintained along the site edge to preserve natural vegetation and soften the visual impact of the built environment. Furthermore, the number and size of erven were reduced from earlier iterations to increase the proportion of open space and limit obstruction of visual access to the coastline.

Despite these measures, the proposed development will occupy a portion of the coastline that is currently undeveloped, without adjacent structures to form a continuous built pattern. Consequently, the development is expected to result in high visual intrusion. Receptors of this anticipated visual impact include residential areas, which are considered to have high visual sensitivity, as well as users of the coastal landscape who value its scenic and cultural qualities. Although the site falls within the proposed urban edge, it interfaces with a coastal cultural landscape of high visual and scenic amenity.

Significance of Sensitivity to Visual Change

Based on the landscape sensitivity and the anticipated magnitude of change resulting from the development, the sensitivity to visual change is considered to be of high significance.

Visual Exposure

The proposed development will occupy a pristine portion of the coastline with no adjacent development, resulting in high visual intrusion. The site's low visual absorption capacity, due to its undeveloped character and unique landscape quality, further exacerbates the visual impact. While mitigation measures can partially improve visual absorption, in the absence of such measures, the anticipated visual impacts are considered to be of major significance.

To ensure long-term heritage-sensitive integration, a set of strict architectural and landscape guidelines has been adopted (see **Appendix G6** and **Appendix G11a**) . These include limitations on building heights and roof profiles, the encouragement of natural materials and finishes, requirements for permeable fencing, and the rehabilitation of indigenous vegetation. A design review committee has been recommended to oversee building applications and alterations, thereby ensuring that all future development remains aligned with heritage and visual sensitivity requirements.

7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.

Archaeological Resources

The Archaeological Impact Assessment (Kaplan, 2024) recorded only thin traces of marine shellfish (mainly Turbo sarmaticus / alikreukel) and very few artefactual remains on the site. No pottery, bone, or ostrich eggshell fragments were found. These remains have been graded as having Low (IIIC) local significance. Although there is a low probability of encountering buried shell middens or unmarked Khoisan burials during construction, the assessment concludes that the proposed development does not pose a significant threat to archaeological heritage. As a precautionary measure, no mitigation is required prior to construction, but archaeological monitoring of foundation and service excavations must be undertaken by a professional archaeologist

Palaeontological Resources

The Palaeontological Impact Assessment (Pether, 2025) identified the Peninsula Formation bedrock underlying the site as being of high palaeontological sensitivity, although the proposed small-scale development is not expected to significantly impact potential trace fossils preserved below the surface. The overlying raised beach deposits (Klein Brak Formation) and Strandveld sands have a low sensitivity, with occasional fossil shells and bones possible but rare. The study concludes that the palaeontological potential does not present a fatal flaw to development but requires a Fossil Finds Procedure (FFP) to be included in the Environmental Management Programme (EMP). Construction staff must be briefed to recognise potential fossil material, and chance finds must be reported immediately to the ECO and Heritage Western Cape for appropriate management under permit.

Cultural Landscape and Visual Heritage

The Heritage Impact Assessment (Postlethwayt, 2025) and Visual Impact Assessment (Terra+, 2025) both highlight the coastal cultural landscape significance of the Spookdraai site. The area forms part of a historically accessible coastline integral to the identity and fishing heritage of Struisbaai and L'Agulhas. Maintaining coastal access is a key aspect of cultural heritage, with public rights of access historically noted in early title deeds. The site is located within a highly intact and scenic coastal environment of Grade IIIA cultural landscape significance, contributing to the sense of place of the towns and their tourism economy.

The VIA confirms that the site is part of a semi-rural landscape of high visual and aesthetic value, and insensitive development could result in significant negative visual impacts. To address this, the preferred layout (Alternative 5) has been revised to reduce density and integrate architectural and landscape guidelines. A designated public access walkway (Subdivision 7) ensures continued access to the coastline, thus preserving the intangible cultural heritage of public use of the shore.

Other Heritage Considerations

No built structures, graves, or burial grounds are recorded on the site, and there is no evidence of direct or traceable links to slavery or significant historical settlements. Intangible heritage includes local folklore associated with "Spookdraai," which contributes to the sense of place but does not directly constrain development.

Influence on the Proposed Development

The findings of the heritage specialists have directly influenced the design and planning of the proposed development. Adjustments to layout, scale, and density have been made to protect the cultural landscape and preserve visual corridors. Specific mitigation measures—including archaeological monitoring, a Fossil Finds Procedure, and adherence to architectural and landscape guidelines—will be integrated into the Environmental Management Plan (EMP). Collectively, these measures ensure that while heritage resources are present, their

significance is appropriately managed, and the proposed development may proceed without unacceptable impacts on the cultural or historical environment.

With the addition of the Architectural Guideline Document and Landscape Plans the Heritage and Visual specialist were able to better understand and assess the impacts associated with the proposal and therefore support the final preferred Alternative 5.

8. Socio/Economic Aspects

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

Residential Character

The area is predominantly residential, with a mix of permanent residents and holiday homeowners. The permanent residents are primarily local families and individuals who are engaged in occupations related to tourism, fishing, and service industries. Seasonal fluctuations in population occur due to the influx of tourists and part-time residents during holiday periods.

Tourism and Economic Activity

Tourism forms a significant component of the local economy, with Struisbaai being a popular coastal destination renowned for its scenic beaches, historical sites, and proximity to Cape Agulhas, the southernmost point of Africa. The town hosts a variety of accommodations, ranging from guesthouses to self-catering units, catering to both domestic and international visitors. Local businesses, such as restaurants, cafes, and souvenir shops, also benefit from tourism activities.

Fishing

Struisbaai has a long-standing fishing heritage, and the fishing industry continues to play an important role in the local economy. The community includes both commercial and subsistence fishers. The local harbour serves as a hub for fishing activities and supports associated industries such as seafood processing and boat maintenance.

Social Infrastructure

The area features basic social infrastructure, including schools, places of worship, and recreational facilities. These amenities support the daily needs of the local population and contribute to the sense of community. However, access to specialized services and facilities may require travel to larger towns in the region.

Environmental and Scenic Value

The proximity of the community to the coastline underscores its reliance on the surrounding natural environment, not only for economic activities such as tourism and fishing but also for the residents' quality of life. The area's natural beauty, including its beaches, and coastal vegetation, is integral to the community's identity and its economic viability.

Existing Traffic Conditions (refer to **Appendix G**).

Existing Roadways in Site Vicinity

Marine Drive R319 (Provincial Main Road MR00261): One lane per direction, 60 km/h posted speed limit with a gravel shoulder on the northern side of the road and a walkway along the southern side of the road. The road surface is in a fair condition in the site vicinity.

Existing Conditions

The existing traffic volumes and traffic demand on the surrounding road system as observed during the site visit are relatively low, not only on the side streets, but also along MR00261. The Annual Average Daily Traffic (AADT) along MR00261 is approximately 3 900 with approximately 330 two-way peak hour trips. The directional split is close to 50/50 meaning the peak hour traffic volume in the peak direction is in the order of 165 vehicles per hour. The existing low traffic demand along the surrounding roads results in many gaps in the traffic stream, which enables side road traffic to enter these roads with minimal delay. No significant conflict situations were observed during the site visit.

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

The final socio-economic value is not yet been determined; however it is expected that job creation both during construction and operational phases, will take place although due to the scale of the development, these will not create significant benefits. The development will add to local spending and further investment in the Struisbaai area.

It is not expected that significant negative socio-economic impacts will be derived as a result of the proposed development. Due to the small scale of the proposal, there will not be an influx of migrant / temporary construction teams and it is envisaged that local contractors will be used as far as possible.

Traffic Impact

From the observations during the site visit it is evident that all the intersections in the vicinity of the site have sufficient capacity to accommodate the additional trips that will be generated by the proposed development. Based on the nature and extent of the proposed development and the current traffic conditions it is concluded that the transport impact of the proposed development will be insignificant. Therefore, no specific road improvements other than the access off Marine Drive will be required to accommodate the additional trips that will be generated by the proposed development. The four development alternatives have similar trip generation, and the expected transport impact will be the same for all four alternatives. The transport impact associated with all four alternatives will be of low negative significance.

During the peak holiday periods during Easter weekend and the Christmas holidays the traffic volumes along the road network in the surrounding area can increase to almost double the volumes during the typical weekday peak hours. However, due to small size of the proposed development the surrounding road network will have sufficient capacity to accommodate the new trips associated with the proposed development even during the peak holiday periods.

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

The applicant will aim to employ local service providers and labourers as far as practically feasible, to enhance the local benefits as far as possible.

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

Noise, Odours and General Amenity

The proposed development consists of only six residential dwellings, which is small in scale relative to the broader settlement pattern of Struisbaai and L'Agulhas. As such, the project is not expected to generate significant noise or odour impacts. The land use aligns with existing residential character in the area, and normal domestic activity associated with private dwellings is not anticipated to exceed acceptable thresholds for community health or amenity. No industrial, commercial, or nuisance-generating activities are proposed, and therefore, the development will not adversely affect people's health through noise or odour emissions.

Visual Character and Sense of Place

The site currently forms part of a coastal cultural landscape of high scenic and contextual significance. The introduction of built form will alter the immediate visual character and community sense of place. However, the extent of this impact has been carefully considered through the Visual Impact Assessment (VIA) and the Heritage Impact Assessment (HIA). The preferred layout has been deliberately designed to reduce density, maintain key sight lines, and retains an open space and pedestrian access to the beach. In addition, detailed architectural and landscape guidelines have been developed to ensure that the buildings are sensitively integrated into the environment, with scale, form, and landscaping designed to minimise visual intrusion. Over time, the maturing of indigenous vegetation will further soften the visual impact and ensure that the development blends into the coastal setting.

Public Access and Well-being

One of the strongest community concerns relates to the preservation of public access to the coast, which has long been part of the local identity and sense of place. The development has directly responded to this by incorporating a dedicated public access walkway (Subdivision 7) into the site plan, ensuring continued and secure access to the shoreline. This measure sustains the cultural and recreational value of the coast for the broader community and mitigates potential negative effects on social well-being.

Overall Influence on the Development

Overall, the potential impacts of the proposed development on people's health and well-being are low and manageable. Noise and odour impacts are negligible due to the residential scale of the project. Visual and sense-of-place concerns, which are more sensitive, have been addressed through design revisions, reduced density, and strict adherence to architectural and landscape guidelines. The inclusion of public access routes further strengthens the positive social outcome.

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. Details of the alternatives identified and considered

1.1.	Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred property and site alternative.	

The property concerned, an unsubdivided (split) portion of the Remainder of Farm 281, Struisbaai is situated on the seaside of Marine Drive, opposite its intersection with Adelle Street (although this section of the street is yet to be constructed). It forms part of a narrow 'strip' along the coast that has a rocky shoreline consisting of sandstone of the Table Mountain Group. The location is known as Spookdraai. Note that the Marine Drive Road reserve separates the subject property from the actual Marine Drive Road and no development is proposed for this strip of natural vegetated area.

The site is nestled on the foothills of the minor hills and landforms in the landscape. This provides some protection from prevailing winter winds but exposes the site to strong wind that buffets the coastline in summertime. There is a sense of being tucked against the slope with views to the sea and beyond. This is further emphasised by the bend in the road that leads to Agulhas. The coastline is a series of rocky outcrops, indigenous vegetation and footpath leading to accessible spaces for fishing and recreation. There are one or two small sandy beaches along this portion of the coast, which intimates a sense of seclusion.

The coastal town of Struisbaai is located in the Bredasdorp District and essentially continuous with the coastal settlement of L'Agulhas. The site is undeveloped, not farmed and in its natural state as part of the coastline. A stormwater outlet is located in the northeastern corner alongside the main road, which has created visible erosion on the proposed development area.

Figure 21: View of the site with approx. development area indicated in red. Note that the white line does not indicate the property boundary.

The **preferred alternative (Alternative 5)** proposes a rezoning from Agriculture to Sub-divisional Area as follows:

- → In terms of Section 15(2)(d): Subdivision of Remainder Farm Paapekuil Fontein No. 281 (422,62 ha) into:
  - Remainder (Re/281 on Plan) of 421,9087 ha; and
  - Portion A (A/281 on Plan) of 0,7113 ha (split potion) – Subject Area
- → In terms of Section 15(2)(a): Rezoning of Portion A from Agricultural Zone to Sub-Divisional Zone to make provision for the following erven:
  - Erf 1: Medium Density Residential Zone: 512m^2
  - Erf 2: Medium Density Residential Zone: 489m^2
  - Erf 3: Medium Density Residential Zone: 462m^2
  - Erf 4: Medium Density Residential Zone: 470m^2
  - Erf 5: Medium Density Residential Zone: 474m^2
  - Erf 6: Medium Density Residential Zone: 476m^2
  - Erf 7: Open Space: 3270m^2
  - Erf 8: Open Space: 60m^2
  - Erf 9: Street: Private Road: 900m^2
    TOTAL: 7113m^2

Alternative 4 (previously preferred)

- → This alternative was presented as the preferred layout in the previous round of PPP in March 2025.
- → This design addressed some of the concerns raised in the specialist assessments of Alternative 3 by reducing the overall development density and enhancing visual corridors and sightlines. Furthermore, the revised layout increased the retention of indigenous flora, particularly in the western portion of the property, which is designated as ESA1, thereby aligning more closely with environmental priorities. The layout also takes into account the coastal risk zones, with these areas being fully avoided in the proposed design.
- → The Alternative 4 incorporated a 1.5 m wide public footpath along the western boundary, providing access to the beach below the High-Water Mark. It was however unclear whether the majority of the beach, which falls into former Erf 8 (Private Open Space) will be public. The zoning presented was ambiguous.
- → The HIA concluded that the indicator suggesting the maintenance of a number of physical, publicly accessible links across the site and along the coastline has been given minimal acknowledgment and therefore did not adequately address the principles of ICMA.
- → Concerns were raised regarding the Visual Impact potentially affecting not only nearby property owners but also the broader community and visitors who value the coastal drive and its scenic quality. The planning parameters provided for only 2 m lateral building lines for residences; and for garages and storage buildings, 1.5 m from lateral and rear boundaries. This provided no appreciable opportunity to ensure continuous corridors between units to ensure substantive and generous visual connection with the ocean from Marine Drive
- → Numerous comments emphasized the significance of the Spookdraai area as a heritage site, citing deep ancestral connections to the land.
- → Maintenance of a green buffer: Without a Landscape Master Plan, it can be assumed there is none provided, nor will it be required in terms of the planning parameters. The location of a service road to provide access to the properties, accessed via a central point, with a refuse room, and no restriction on boundary walling compounded this omission.
- → There are no development or architectural guidelines, and thus no ability to control the architectural expression of the zoning parameters on any of these sites.

- → In overall terms, the heritage (and related visual) impacts were concluded to be High, negative. There is limited information available to assess the significance of the impact of the preferred alternative, however, should the landscape and visual indicators be followed and applied then the significance of the impact may be lowered.
- → No assessment of the Animal Species Theme had been undertaken, leaving possible ecological aspects unknown.
- → The site-specific siting of actual dwellings and footprints were no investigated fully and units were not set back as far as possible on each erf.
- → The internal road was longer than required, with the northern boundary wall extending along the entire length of the property resulting in visual barriers.

Alternative 5 (Preferred)

- → Alternative 5 presents the 5th and final layout.
- → The revisions are based on responses to the specialist assessments, organs of state comments and public input.
- → The proposed development incorporates a formalised public footpath along the western boundary, with provision for wheelchair access on this very steep portion of the site. Access to the beach will be unimpeded and Erf 7 is to be zoned open space and access below the high-water mark remains public (the previous iteration included only a 1.5m walkway on private open space.
- → General access in and around the site is improved significantly for the general public, in the spirit of ICMA

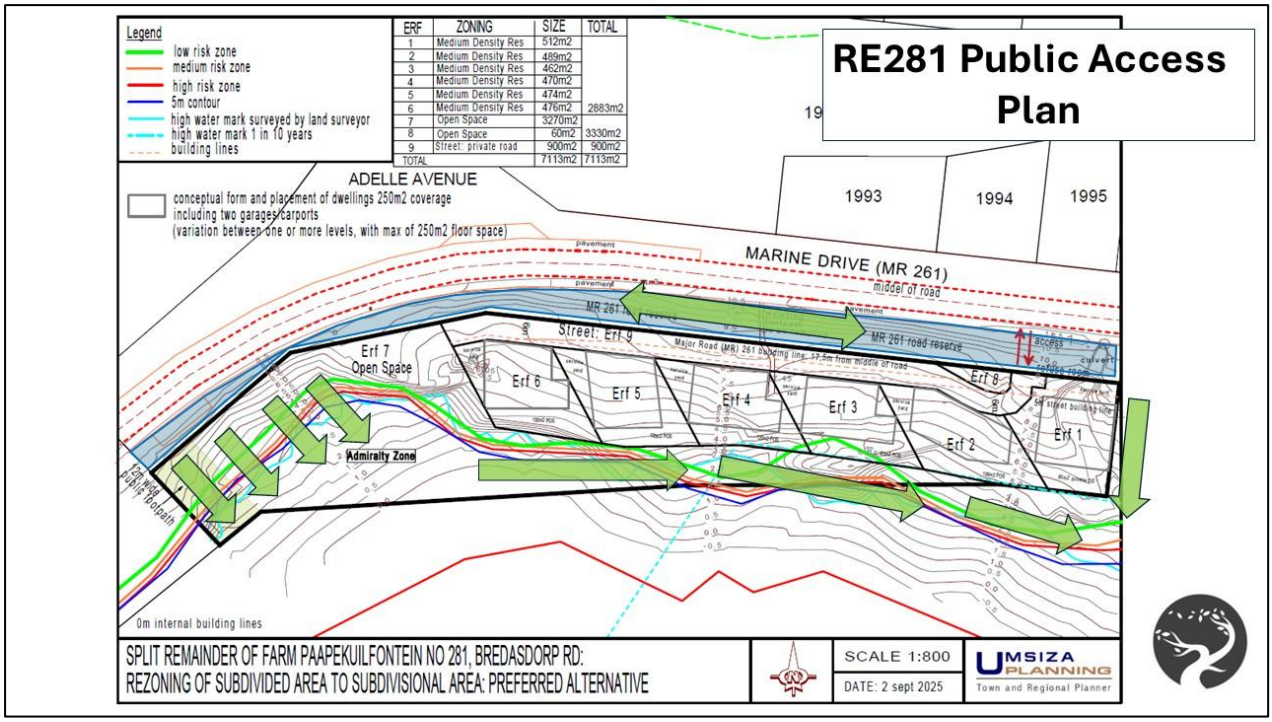


Figure 22. Public Access Plan – Alternative 5

- → With the input of the specialist drone photography, the use of sight lines and the recommendations of the Visual specialist and Architect, site specific placement of dwellings have been undertaken. In both erven 1 and 2 the building placement is below the height of the road and within the building lines recommended in the architectural guidelines. The building roof line and massing also follows the natural ground plane and remain within the 7.5 m height restriction. With adherence to the architectural and landscape guidelines, the visual impact will be mitigated, and the dwellings can fit within the landscape. As with erven 1 and 2 the

massing exercise for erven 3 and 4 show the conceptual dwellings well below the road height. The architectural rendering applied for erf 3 is a more appropriate style provided there is sufficient overhang to minimise glare of large fenestration. In both instances the building massing and height remain below the building height of 7.5 m and follow the natural ground plane.

- → For erven 5 and 6, the continuous roof-scape could be interrupted to avoid a cumulative effect of the continuous roofline and mass. Although both these dwellings are below the road height, the massing may have a negative impact if not mitigated with the use of muted colours and green roof planting.
- → The architectural guidelines and landscape development plans illustrate setbacks and stormwater escape routes which create visual and green corridors between all residential units. The removal of development, other than the boardwalk, at Spookdraai corner, has improved the visual and green corridors of the proposed development.
- → The architectural guidelines and landscape development plans illustrate a vegetated buffer between the existing pedestrian walkway and the access service road. Note that the Marine Drive Road reserve is located between the subject property and the surfaced Marine Drive and therefore this are will not be developed and will therefore remain a vegetated buffer between Marine Drive and the development.
- → Garages are set-back from the road edge with a minimum of 5 m to limit the cumulative impact of a solid wall along the site street edge.
- → The provision of architectural guidelines for Alternative 5 establishes more appropriate parameters, including measurement of ground level, roof-scape, massing and heights
- → The portion of the field-of-view dominated by the proposal decreases substantially at distances beyond 1 km from the site, as the proposal becomes screened by existing landforms and vegetation.
- → This alternative introduces a slightly different zoning from previous versions of the layout. Rezoning to "Medium Density" erven will be undertaken. This revised zoning allows for a 5 m street building line and 0 m internal building line, enabling dwellings to be set 3 m further inland compared to their original positions. This adjustment responds specifically to recommendations from DEADP Coastal Management, which advised that all development should be located as far landward of the coastal risk zones as possible. The theoretical positions of the dwellings are illustrated on the preferred layout plan. The footprints of the dwellings cannot be moved any further back.
- → An open space erf (Erf 7) and formalised public access on the western portion of the property, providing formalised access for recreational and fishing activities. This design element directly addresses the requirements of the Integrated Coastal Management Act (ICMA) and reflects community concerns about maintaining traditional coastal access.
- → Alternative 5 was designed to better integrate with the natural topography of the site. Residential erven are strategically placed to minimise intrusion into the landscape, while open space erven preserve natural vegetation and the rocky shoreline.
- → The layout maximises the retention of indigenous flora in accordance with the Architectural and Landscape Guidelines, protects sensitive habitats, avoids development in areas of medium ecological (botanical) sensitivity, and incorporates measures to screen the development, thereby reducing visual intrusion along Marine Drive.
- → Stormwater and erosion management considerations have been integrated to protect both residential and open space areas, ensuring the long-term sustainability of the site.

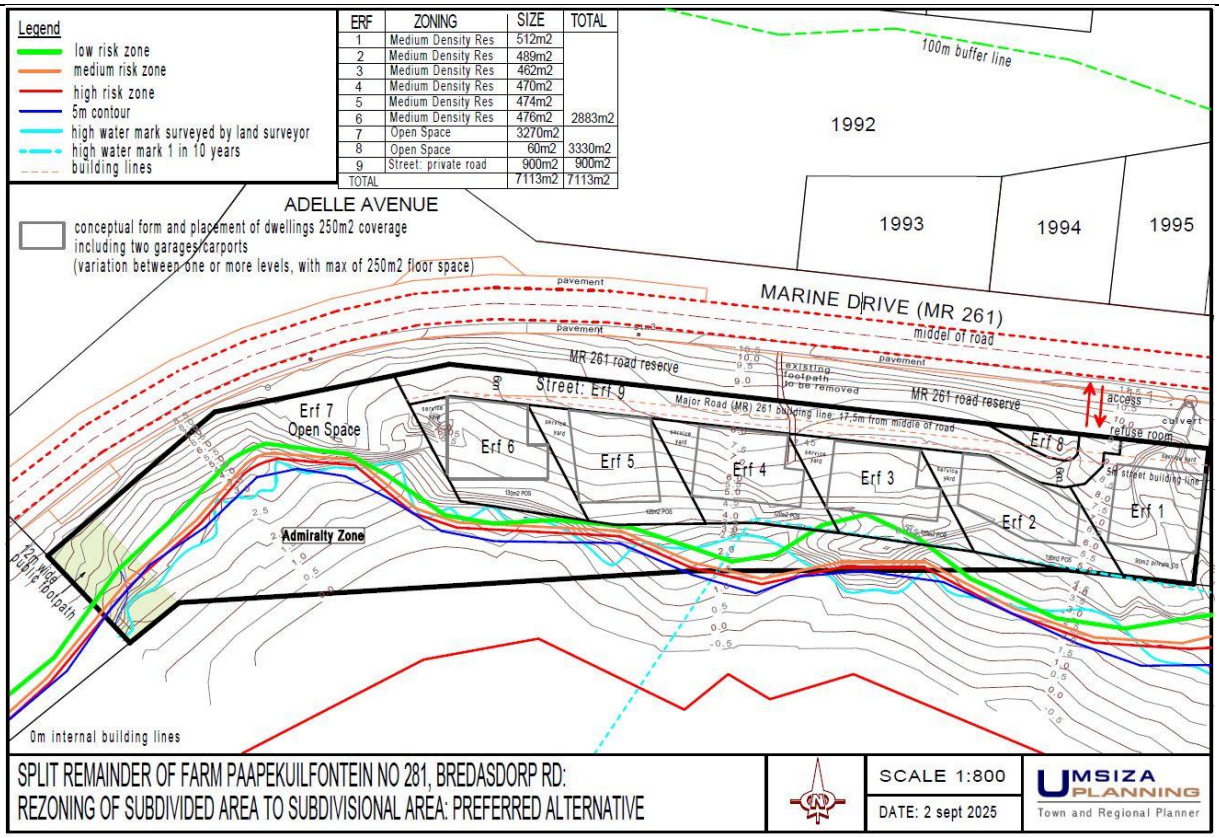


Figure 22: View of the preferred site development plan (Alternative 5).

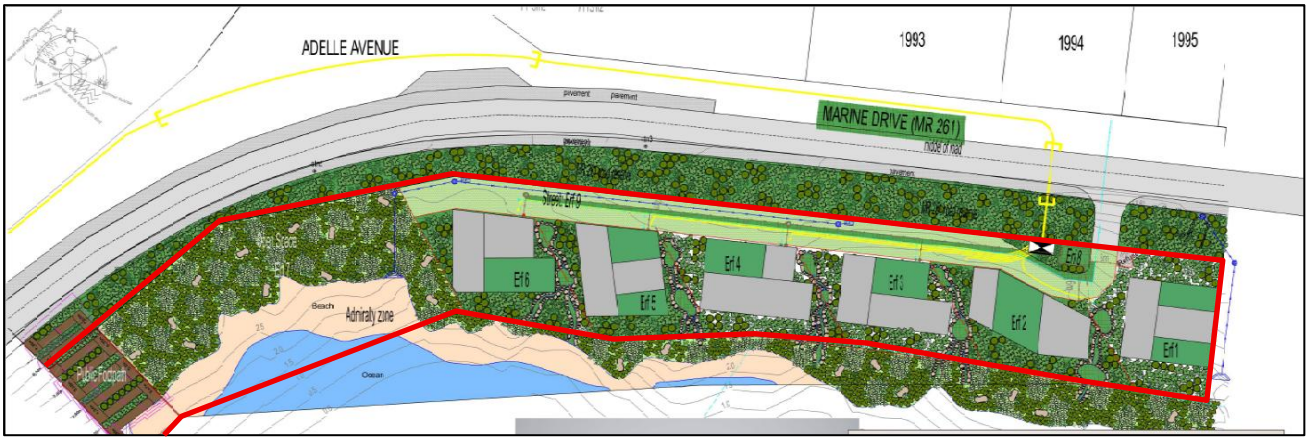


Figure 23: Visual representation of the proposed site development plan (Alternative 5).

Figure 24: Deep erosion ditch in the foreground created by the stormwater outlet on site.

Provide a description of any other property and site alternatives investigated.
No site alternatives are applicable. The investigation is only limited to the subject property. No other sites were considered or investigated for this project.
Provide a motivation for the preferred property and site alternative including the outcome of the site selectin matrix.
There were no alternative properties considered for this application. The development proposal is for a coastal, low-density development for the owners of the property.
Provide a full description of the process followed to reach the preferred alternative within the site.
No site alternatives have been evaluated – the development proposal is specific to the unique characteristic of the property in question. Development elsewhere would not result in the same development proposal or vision.
Provide a detailed motivation if no property and site alternatives were considered.
No site alternatives have been evaluated – the development proposal is specific to the unique characteristic of the property in question. Development elsewhere would not result in the same development proposal or vision.

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

No property of location alternatives are applicable.

Positive impacts

- → The development will facilitate the restoration of portions of the site currently experiencing degradation due to inappropriate stormwater management resulting in erosion, creation of informal footpaths and invasive alien vegetation.
- → Construction and operational aspects of the development will generate job opportunities for the local community, contributing to socio-economic upliftment, although given the small scale of the development, these benefits will be limited in scale.
- → The proposed development will improve the value of adjacent properties, promoting further investment in the area.
- → The incorporation of sustainable design principles, such as eco-friendly infrastructure, landscaping with indigenous vegetation and roof top gardens have the potential to enhance local aesthetics and promote environmental awareness.
- → The use of specialist drone photography for Visual Impact Analysis in the design phase assisted in minimising sight and view lines, and have improved the design proposal
- → The development has the ability to attract tourists and / or new residents and visitors to the area, providing a boost to the local economy as well as encourage local spending.
- → The proposal (Alternative 5) includes the formalisation of the beach access on the western end of the site, facilitating safer access for the public whilst reducing the environmental impacts associated with informal footpaths. This design access point will create a attraction to the Spookdraai beach and its associated cultural heritage.

Negative impacts

- → The development is located in close proximity to the coastal environment and therefore risks associated with coastal development may be experienced.
- → Construction activities may lead to short term increased soil erosion and sedimentation, negatively affecting the surrounding coastal environment.
- → Residual Visual Impacts will be experienced particularly relating to the change from a vacant property to a built up development.
- → Improper management of construction runoff, waste, or stormwater may pollute nearby environments, including coastal zones.

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

Provide a description of the preferred activity alternative.

The preferred activity Alternative includes the establishment of a residential development consisting of 6 medium density residential erven, open spaces, a private road and associated infrastructure.

Provide a description of any other activity alternatives investigated.

N/A

Provide a motivation for the preferred activity alternative.

The preferred activity alternative involves the establishment of a residential development on the Remainder of Farm 281, situated within the urban edge of Struisbaai. This location represents a logical expansion of Struisbaai' s urban footprint, as it is adjacent to existing residential development located to the north above Marine Drive. By concentrating development in this area, the activity aligns with local spatial planning and land-use policies discussed in this report, and it further supports urban growth through infill type development rather than urban sprawl. The site provides a unique offering in terms of size and location which makes it desirable for some type of residential development.

The site's location within the urban edge allows for the efficient extension of existing infrastructure and services, including road access, stormwater management, and utility provision. This reduces the environmental and economic costs of development compared to alternative locations outside the urban edge, ensuring that the proposed residential activity can be accommodated in a practical and sustainable manner.

Environmental considerations have been carefully integrated into the activity alternative, including specialist assessments undertaken onsite to inform the layout alternative. The proposed layout avoids areas of ecological sensitivity and maximises the retention of indigenous vegetation, while open space on the western portion of the site ensures continued access for recreational and fishing activities, in accordance with the Integrated Coastal Management Act (ICMA). These measures protect natural habitats while maintaining the community's historic use of the coastal zone and provide the landowner with the opportunity to development the remaining area of their property.

The evolution of **Alternative 5** sees the Coastal, Visual and Heritage concerns being addressed through:

- → Intentional positioning of residential dwellings further away from the coastal risk zones through the relaxation of the rear building lines.
- → Provision of larger open spaces to facilitate improved public coastal access.
- → Formalising public access to Spookdraai beach via a boardwalk access on the western end of the site
- → The use of specialised Drone photography to facilitate better design of dwellings and reduction of visual impacts.
- → Designation of the area below the High-Water Mark as an Admiralty Zone
- → Maximised public access through formalised access and continued access along all side of the development

Mitigation measures, including the Landscape Plan and Architectural Guidelines, will assist in reducing visual intrusion. The specific siting of dwellings to follow natural contours and the use of stepped building forms with natural materials (stone, timber, and exposed concrete) ensures that the development integrates harmoniously into the landscape. Over time, as vegetation matures, the visual impact will further diminish, enhancing the aesthetic integration of the development along Marine Drive and respecting the cultural and heritage significance of Spookdraai.

The development also delivers social and community benefits, including contributions through municipal levies that support local infrastructure and services in Struisbaai, while maintaining public recreational opportunities and coastal access. Overall, the development balances development needs, environmental protection, visual and heritage integration, and broader urban planning objectives, ensuring a sustainable, context-sensitive outcome that respects both the ecological and cultural importance of the Spookdraai area.

Provide a detailed motivation if no activity alternatives exist.
The owner of the land is applying to development residential opportunities on their property. No other activities are therefore investigated.
List the positive and negative impacts that the activity alternatives will have on the environment.
No activity alternatives exist. The property is within the urban edge and adjacent to the built-up urban edge. The proposed residential development is in line with the municipal planning bylaws.

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

Provide a description of the preferred design or layout alternative.

The property concerned, an unsubdivided (split) portion of Farm Re281, Struisbaai, is situated on the seaside (south) of Marine Drive and Marine Drive Road Reserve, in the area known as Spookdraai. The split portion of the property affected is 0.71 ha in extent but forms part of a larger agricultural landholding of 474.8209 ha. The land is undeveloped, not farmed, and in its natural state as part of the coastline.

The Preferred Alternative (Alternative 5) proposes a rezoning from Agriculture to Sub-divisional Area to make provision for:

- → Six (6) Residential erven,
- → Two (2) Open Space areas; and
- → An internal private access road.

Revisions in Response to Public Concerns

Visual Intrusion and Scenic Quality

- → Public comments highlighted the risk of visual obstruction along Marine Drive and the loss of uninterrupted coastal views posed by the proposed development.
- → In response, Alternative 5 reduced the overall density and adjusted the placement of erven to avoid development on the visually prominent corner of the site. More open sight lines are provided for through the implementation of the Architectural and Landscape Guidelines.
- → An Open Space (7) is introduced to preserve natural sightlines and protect the coastal views that are integral to the sense of place and tourism value of Struisbaai–L'Agulhas.

Heritage and Cultural Landscape

- → Concerns were raised regarding the cultural and heritage significance of the Spookdraai landscape, including its Grade IIIA heritage classification and association with ancestral use, fishing traditions, and oral history.
- → The preferred layout enhances the retention of natural areas within the property and incorporates design controls through a comprehensive Architectural Guideline Document and Landscape Plan. These measures aim to ensure that new dwellings are compatible with the cultural landscape, thereby reducing the risk of permanent heritage degradation.

Public Coastal Access

- → A recurring concern was the loss of long-standing footpaths and informal fishing and recreational access to the coastline.
- → The revised layout incorporates formalised public access route to the beach (Subdivision 7) which is also clearly identified, directly addressing public concerns around the loss of traditional pathways and fishing access. This provision recognises historic use of the coastal access by residents and visitors and ensures continued access to the coast for fishing and recreational activities.

Scale and Embeddedness in the Landscape

- → The public raised concerns that large, double-storey dwellings could replicate the negative precedent of nearby intrusive developments.
- → Alternative 5 includes architectural and landscape guidelines to regulate scale, height, bulk, form, and landscaping. This will ensure that new structures are low-profile, visually recessive, and more sensitive to the natural topography and vegetation.

Alternative 5 (Preferred)

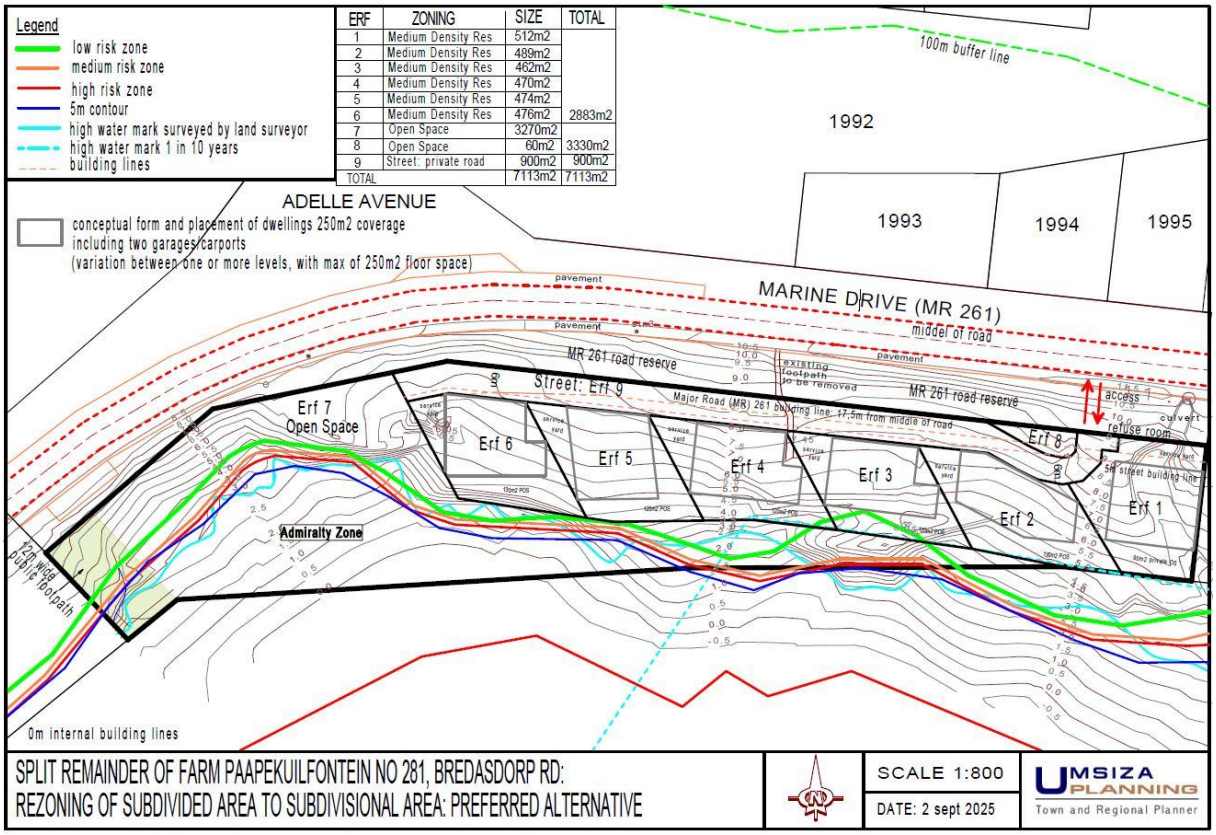


Figure 25: View of the preferred alternative (Alternative 5)

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

Alternative 1 (No-Go)

Alternative 1 assumes that the current conditions on the site remain unchanged, and no development takes place. This option, while preserving the natural and cultural environment in its entirety, also presents risks associated with future development which is inappropriate as well as continued degradation of the site through insufficient management and uncontrolled access across the site which leads to multiple informal paths and erosion. In addition, this option does not acknowledge the rights of the private owner.

Alternative 2

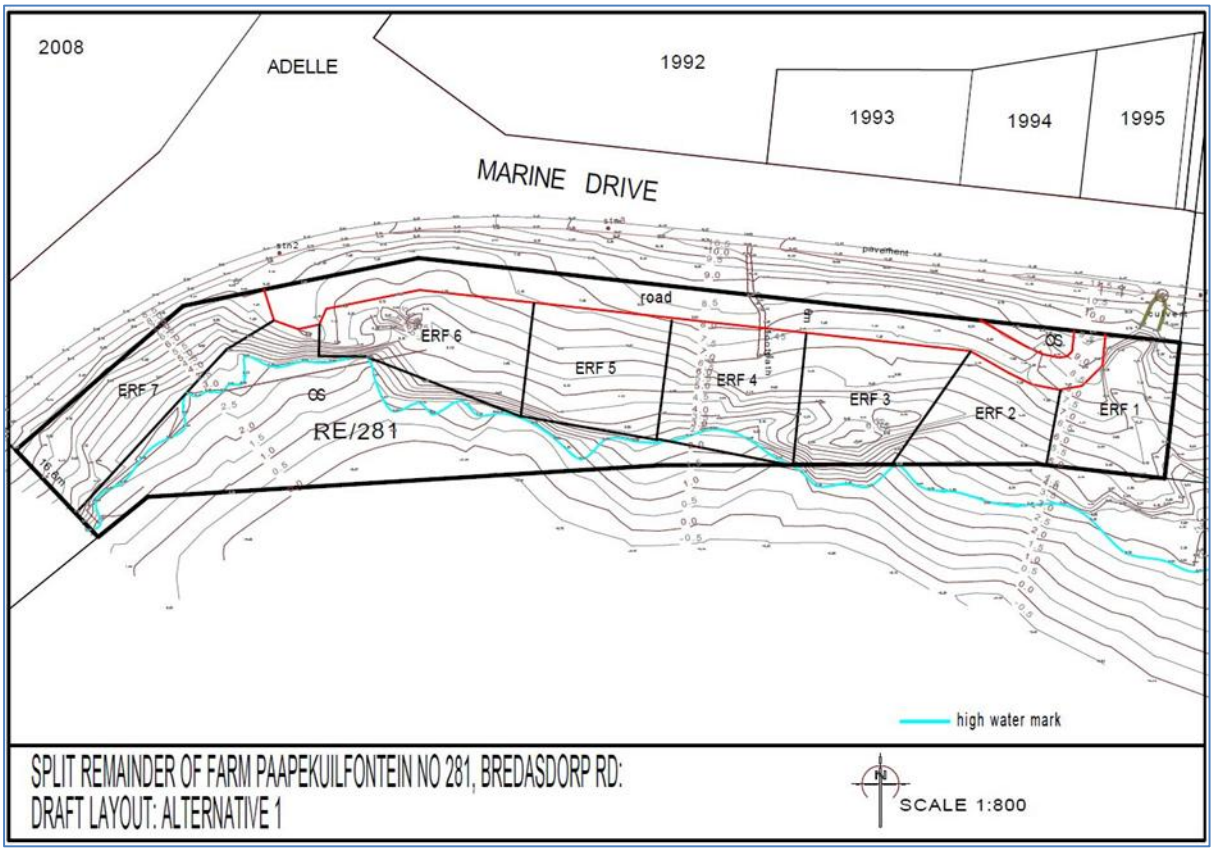


Figure 26: Alternative 2 layout plan.

This alternative includes the construction of 7 residential erven, with a parallel private road access alongside Marine Drive and an private open space erf below the High-Water Mark. While this layout aimed to provide a potential solution for the site, it was ultimately discarded for several key reasons:

- → The proposed density of seven erven was deemed too high for the site and would have resulted in significant negative impacts on the surrounding environment and cultural aspects.
- → This alternative did not include any provision for public coastal access, which was a crucial aspect of the development's objectives.
- → The option only considered the high-water mark in its planning and did not take specific cognisance of the other Coastal Management Lines, as well as overlooking other significant environmental factors, such as the need to preserve indigenous vegetation and sensitive habitats.

- → The amount of open space allocated in this layout was insufficient to support the ecological and recreational needs of the development, limiting its long-term sustainability.
- → The proposed erven 1 to 3, located along the southern boundary of the property, were positioned too close to seaside erf boundary and provided no opportunity to retain a natural buffer between development and the coast. This not only posed risks related to coastal storm surges and sea level rise, but also compromised the privacy and safety of the residential units.
- → The orientation of the erven did not allow for optimal views or shelter from prevailing winds, which would have negatively impacted the comfort and desirability of the homes and long-term use value i.e creating a development which is not desirable or practical
- → This layout alternative would have resulted in significant impacts, including the loss of indigenous vegetation in the western portion of the site, which is mapped as medium sensitivity.
- → Additionally, this alternative would have contravened the National Environmental Management: Integrated Coastal Management Act (NEM:ICMA) due to the proposed privatisation of the beach, restricting public access and recreational use.

Alternative 3

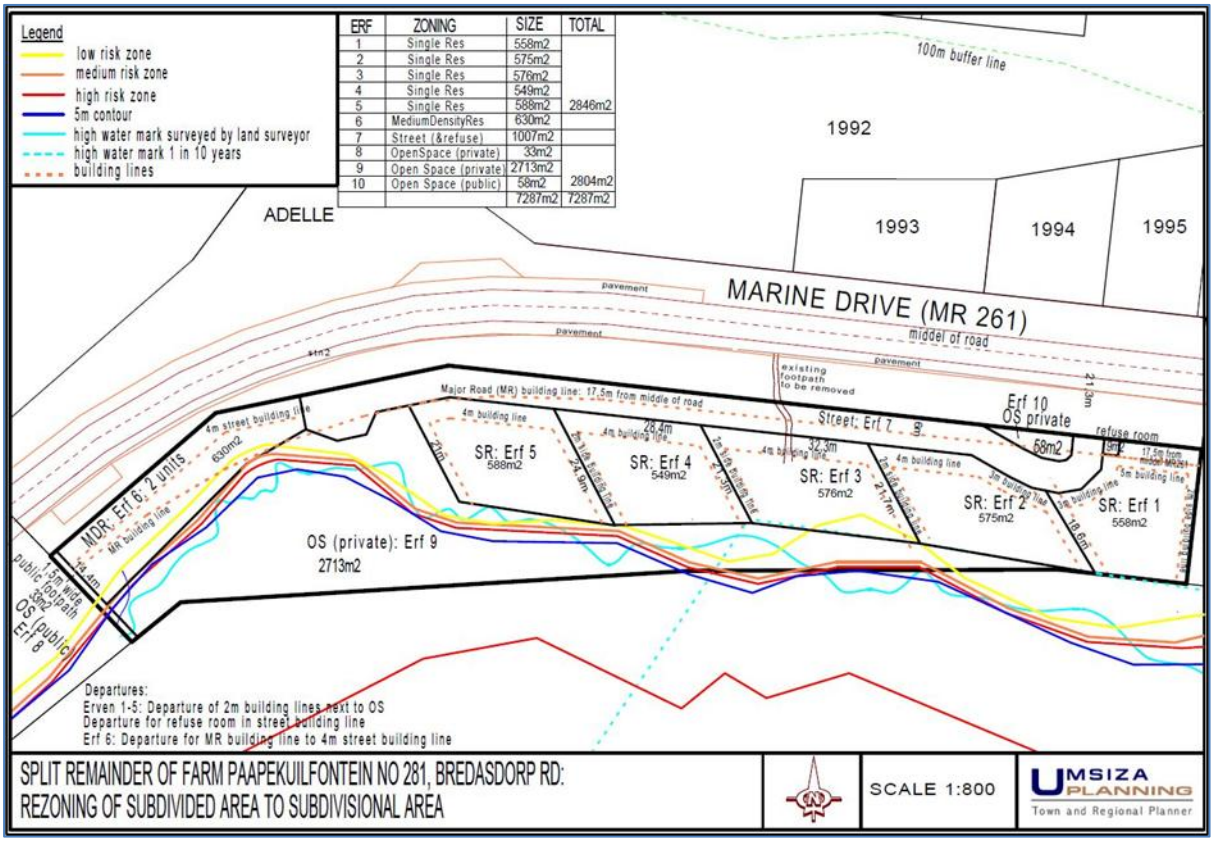


Figure 27a: Alternative 3 layout plan.

Figure 27b: Alternative 3 layout plan – Conceptual Render

Alternative 3, while similar to Alternative 2, incorporated key environmental planning considerations such as the 5 m contour line, the High-Water Mark, and the High, Medium, and Low Risk Coastal Zones. This layout included five single residential erven on the eastern end, ranging in size from 549 to 588m^2, and one medium-density residential erf of 630m^2, which was intended for two dwellings on the western extent of the site. It also proposed a private road access parallel to Marine Drive and a 1.5m wide public footpath along the western boundary, providing beach access below the High-Water Mark. A private open space of 2713m^2 was included, consisting of the beach and some of the rocky shoreline within the property boundary.

Alternative 3 is not considered the preferred alternative due to several reasons, including that the layout was not supported by the Heritage Impact Assessment (HIA) and Visual Impact Assessment (VIA). The layout contravened provisions of the ICMA, as the proposed private open space effectively restricted public access to the beach, limiting recreational and fishing opportunities along the coastline. This alternative was also not preferred from a botanical perspective due to development proposed for the more sensitive western section.

Alternative 4 – Previously preferred

Alternative 4 was presented as the previously preferred layout during Public Participation Process 1. It was developed in response to some of the concerns raised by the specialist team and sought to balance environmental and cultural sensitivity with development feasibility on the site.

The layout proposed a rezoning from Agriculture to Subdivisional Area, to accommodate 6 Single Residential Zoned erven, access to the coast via a 1.5 m path on the Western end of the site, internal access and Private Open Space erven. While the configuration reflected a more compact and environmentally responsive design than earlier options, it also introduced a Private Open Space Erf (Erf 8) positioned along the beach area, which effectively restricted public access and was deemed inconsistent with the principles of the National Environmental Management: Integrated Coastal Management Act (NEM: ICMA). The ICMA emphasises that the coastal zone must remain accessible for public use and enjoyment, and thus the privatisation of this area conflicted with its core intent.

From an environmental perspective, Alternative 4 achieved a reduction in development density and avoided areas of medium ecological sensitivity, including the Ecological Support Area (ESA1) and coastal risk zones. However, at the time of its assessment, no faunal specialist study had been undertaken. As a result, potential impacts on

terrestrial fauna, including species of conservation concern, were not yet fully understood or mitigated. This omission limited the environmental robustness of the layout and influenced subsequent revisions.

The planning parameters provided for 2 m lateral building lines for residences; and for garages and storage buildings, 1.5m from lateral and rear boundaries. This provides no appreciable opportunity to ensure continuous corridors between units to ensure substantive and generous visual connection with the ocean from Marine Drive. No Landscape Master Plan informed the layout, which limited the prediction of the impact particularly relating to Heritage and Visual aspects. The location of a service road to provide access to the properties contained no restriction to the boundary walling which further affected visual and cultural impacts. The alternative included no development or architectural guidelines, and thus no ability to control the architectural expression of the zoning parameters on any of these sites. The Heritage specialist acknowledged that a contemporary interpretation is feasible and possible for this layout. However, without architectural guidelines to establish more appropriate parameters, the roof-scape, massing and heights are not restricted. The visually continuous structures that are possible to achieve with the zoning parameters may have a cumulative effect of a "solid" wall architecture. Therefore, from a Heritage and Visual perspective, this layout was not desirable. It is likely that with guidelines that respond more directly to the indicators, and no permissible departures, the density of development permissible in terms of the preferred alternative would not be possible to achieve.

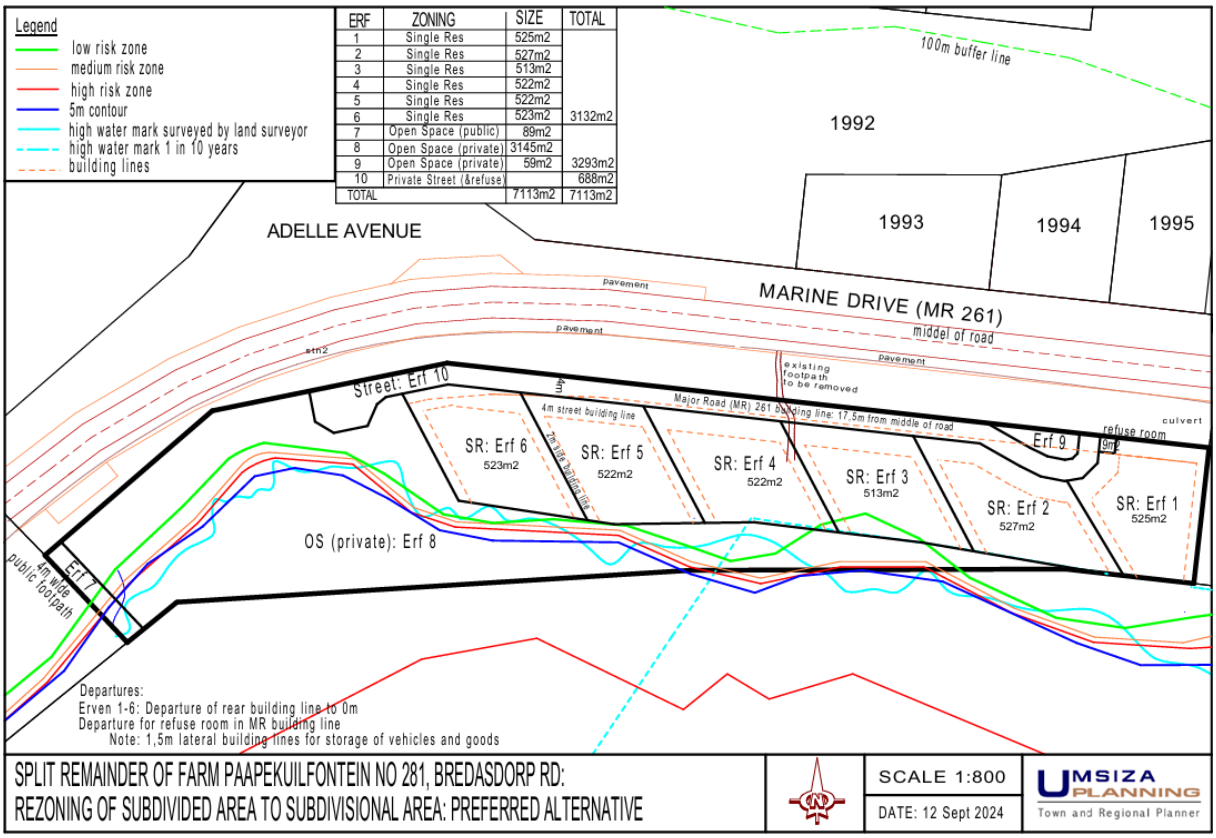


Figure 28: Alternative 4 – previously preferred.

Provide a motivation for the preferred design or layout alternative.

The final preferred layout (Alternative 5) has been selected as the most balanced and sustainable option for the proposed development. It reflects a progressive evolution of earlier layout alternatives, informed by specialist assessments, public participation outcomes, and statutory requirements. The design represents a considered compromise between enabling appropriate coastal residential development and safeguarding the ecological, cultural, and visual qualities that define the character of the site and its surroundings.

Balanced Residential Development and Density Reduction

A central motivation for Alternative 5 is the reduction of development density across the property. Earlier alternatives proposed a greater number of residential erven, including layouts that would have intensified development towards the seaward edge of the site. Alternative 5 reduces the extent of built form and carefully repositions residential erven inland, thereby minimizing ecological disturbance, avoiding sensitive habitats, and lessening the scale of visual intrusion from Marine Drive and other vantage points. A reduction in massing and a improvement in visual corridors has been achieved. This change directly addresses specialist recommendations and public concerns regarding overdevelopment, loss of vegetation, and visual intrusion into the landscape.

In both erven 1 and 2 the building placement is below the height of the road and within the building lines recommended in the Architectural Guidelines supplied for Alternative 5. The building roof line and massing also follow the natural ground plane and remain within the 7,5m height restriction. If the architectural and landscape guidelines are adhered to the visual impact will be mitigated and the dwellings can fit within the landscape.

As with erven 1 and 2 the massing exercise for erven 3 and 4 show the conceptual dwellings well below the road height. The architectural rendering applied for erf 3 is a more appropriate style provided there is sufficient overhang to minimise glare of large fenestration. In both instances the building massing and height remain below the building height of 7,5m and follow the natural ground plane.

In the examples for erven 5 and 6 the continuous roof-scape could be interrupted to avoid a cumulative effect of the continuous roof-line and mass. Although both these dwellings are below the road height the massing may have a negative impact if not mitigated with the use of muted colours and green roof planting.

The Architectural Guidelines and Landscape Development Plans illustrate setbacks and stormwater escape routes which create visual and green corridors between all residential units. The reduction in density at Spookdraai corner has considerably improved the visual and green corridors.

Response to DEA&DP Coastal Management Unit

The revised design shows positive response to input received from DEA&DP Coastal Management Unit (CMU). It was recommended that the development should be located as far landward as possible relative to the delineated coastal risk zones. In line with this, the layout introduces group housing with revised building lines which enables dwellings to shift approximately 3 m inland from their original proposed positions through the relaxation of the read building line of each erf. This adjustment reduces exposure to coastal risks, ensures compliance with the Integrated Coastal Management Act (ICMA), and enhances long-term resilience against coastal processes.

Integration with Natural Landscape and Visual Environment

Alternative 5 is designed to integrate with the natural topography of the site, rather than dominate it. Residential erven are positioned with sensitivity to natural contours, while open space erven retain indigenous vegetation, protect rocky shoreline features, and preserve ecological corridors. Architectural Guidelines and a Landscape Development Plan accompany the proposal, ensuring that building form, landscaping, and screening measures

work together to mitigate visual intrusion. This addresses the concerns raised through the Visual Impact Assessment (VIA) and public submissions regarding the risk of coastal views being obstructed by double-storey dwellings. The Architectural Guidelines and Landscape Development plans illustrate a vegetated buffer between the existing pedestrian walkway and the access service road. The latter along with the entrance gate and refuse room is located at a lower elevation (some 2m below road level), at which point the limited boundary wall is to be located, for which appropriate guidelines are established. Of particular importance are the guidelines regarding the building envelope and footprint of the proposed development. It is particularly important to ensure that garages are set-back from the road edge with a minimum of 5m to limit the cumulative impact of a solid wall along the site street edge. The indicated service yard must remain open with greening along the edges. These areas cannot be enclosed as it would have a visual intrusion and interrupt views between the individual dwellings.

Public Access and Avoidance of Privatisation

One of the strongest public concerns evident from PPP1, related to the ambiguity relating to the proposed Private Open Space Erven previously designated. Alternative 4, included a private open space (Erf 8) without a clear understanding relating to accessibility for the public to the coastline. In contrast, Alternative 5 introduces an open space erf (Erf 7) on the western portion of the site, with a formalised access pathway leading to the beach. This ensures that traditional fishing, angling, and recreational use of the coastline remains uninterrupted. The inclusion of formal coastal access both addresses statutory ICMA requirements and responds to the expressed needs of residents and visitors who value Spookdraai as a communal, heritage and recreational space.

Environmental and Ecological Protection

The revised layout maximises the retention of indigenous flora and avoids development within areas mapped as ecologically sensitive, particularly on the western portion of the site. The botanical sensitivities that were overlooked in Alternative 4 have been fully considered in Alternative 5, ensuring that vegetation corridors and sensitive habitats are conserved. Furthermore, stormwater and erosion management measures are integrated into the design, particularly in relation to the erosion ditch in the northeastern corner of the site, thereby protecting both the residential erven and the coastal open space over the long term.

Cultural and Heritage Responsiveness

The Spookdraai area is recognised as having heritage value and deep cultural significance. Earlier proposals were criticised for inadequately considering these factors, with the Heritage Impact Assessment (HIA) cautioning against layouts that would erode the sense of place. Alternative 5 responds to this by reducing visual dominance, respecting the coastal landscape character, and protecting traditional access to the shoreline, thus balancing development potential with the safeguarding of cultural landscapes. The proposal as outlined in Alternative 5 is supported by both the Heritage and Visual Specialists as outlined in those reports.

Outcome of Public Participation and Specialist Inputs

This preferred alternative is the result of a transparent process that gave equal weight to specialist assessments and community concerns. Key refinements such as the relocation of erven inland, inclusion of the open space (7), designation of the Admiralty Zone, formalisation of the stormwater outlet and integration of landscape guidelines were all direct outcomes of the comments raised during the public participation process and the findings of the HIA, VIA, and ecological studies. The result is a layout that is both more environmentally responsible and socially equitable.

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

As above

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

Alternative 1 (No-Go)

Positive Impacts

- → Preservation of the existing natural environment, including indigenous vegetation and fauna.
- → No disturbance to sensitive areas such as ecological corridors, coastal zones, or cultural heritage sites.
- → No contribution to visual or noise pollution in the area.

Negative Impacts

- → Missed opportunity to provide public coastal access.
- → No contribution to local economic development or housing needs.
- → Potential for site degradation over time due to lack of active management or conservation efforts.

Alternative 2

Positive Impacts

- → Provides new residential opportunities with proximity to the coast.
- → Development could support local economic growth through construction and tourism.

Negative Impacts

- → High density increases the environmental footprint, resulting in significant vegetation clearance and habitat loss, especially on the more sensitive western end of the property.
- → Lack of adequate open space and no provision for public coastal access, reducing social benefits.
- → Proximity of erven to the ocean creates potential risks related to coastal erosion and flooding.
- → Poor orientation for views and wind shielding reduces liveability for future residents.
- → Limited consideration of ecological sensitivity and cultural heritage features.
- → Potential contravention of the NEM: ICMA (2008, as amended) by effectively privatising portions of the coastal edge, thereby limiting the public's right of access to the coast (Sections 13 and 17 of ICMA).
- → Strong misalignment with public concerns raised during participation regarding access, density, and ecological preservation.

Alternative 3

Positive Impacts

- → Incorporates measures to address some coastal risks, such as aligning development with the 5 m contour line and risk zones.
- → Includes a public footpath providing access to the beach, enhancing social value.
- → Allocates private open space for conservation of the rocky shoreline and adjacent beach areas.

Negative Impacts

- → Increased density compared to the preferred alternative, leading to moderate vegetation clearance and habitat disturbance.
- → Departures from zoning guidelines could result in visual and aesthetic impacts.
- → Development footprint remains too close to sensitive coastal areas, increasing vulnerability to erosion and flooding.
- → Poor alignment with Heritage and Visual Impact Assessments due to the proximity of structures to the coastline and inadequate integration into the natural landscape.
- → Coastal access provided is limited and not fully compliant with the ICMA provisions, which require safeguarding of public access and prohibition of unjustifiable restrictions.
- → Continued public concern about privatisation and inadequate ecological buffer zones.

Alternative 4

This layout was presented as the previously preferred layout in the first round of public participation (January 2025)

Positive Impacts

- → Reduced density minimizes environmental disturbance, ensuring better conservation of indigenous vegetation and habitat.
- → Substantial allocation of open space supports ecological corridors and enhances biodiversity.
- → Includes an Open Space Zone, improving public coastal access and recreational opportunities.
- → Design integrates with the natural landscape, reducing visual and aesthetic impacts.
- → Coastal risk areas are avoided, enhancing long-term sustainability and safety.
- → Thoughtful orientation of erven optimizes views and provides better protection from prevailing winds, increasing liveability.

Negative Impacts

- → Some disturbance to the natural environment due to construction activities.
- → Limited encroachment on ecological areas, though minimized compared to other alternatives.
- → Potential for localized noise and air pollution during construction.
- → Privatisation of coastal access areas and limiting access to the coast

Alternative 5 (Preferred)

Positive impacts

- → Reduced overall development footprint compared to earlier layouts, ensuring fewer erven and greater ecological integration while still meeting residential needs.
- → The layout refinement is supported by the Heritage and Visual specialists
- → Medium Density zoning replaces traditional single residential erven, enabling dwellings to be positioned further inland (±3 m landward) and with a relaxation of the rear building line to 0 m. This reduces pressure on sensitive coastal edges.
- → Responds directly to DEADP Coastal Management recommendations by excluding high-risk areas and aligning all development landward of the most vulnerable zones, ensuring compliance with NEM: ICMA coastal set-back requirements.
- → Open space erf (Erf 7) formally secures coastal access for recreation, fishing, and walking, directly addressing community concerns and aligning with ICMA provisions safeguarding public access rights.

- → Landscape Development and Architectural Guidelines integrated into the plan reduce visual intrusion, ensure building form is harmonious with the coastal setting, and enhance the sense of place.
- → Retention of natural vegetation within designated open space erven ensuring minimisation of vegetation loss, biodiversity, and scenic character.
- → Stormwater and erosion management measures integrated into the design protect residential, public spaces and coastal environment, supporting long-term environmental sustainability.
- → Orientation of erven optimises views while improving protection from prevailing winds, ensuring liveability and functional urban design.
- → Incorporates recommendations from botanical, visual, heritage, faunal specialists, ensuring the plan is technically defensible and environmentally compliant.
- → Addresses key public objections raised in earlier PPP rounds (density, ecological disturbance, and loss of access), demonstrating meaningful evolution of the project in line with stakeholder input.
- → The preferred layout alternative defines the Alternative admiralty zone as illustrated in the Site Development Plan to continue to function as a public coastal zone under state ownership, ensuring continued public access along the beachfront.
- → Access through the Admiralty Zone will not be restricted, allowing residents and visitors to move freely along the coastal edge.
- → The southern boundary of the residential erven will be clearly demarcated using low-impact wall beams, ensuring defined property limits while minimising visual and environmental impact on the surrounding landscape.

Negative impacts

- → Localised vegetation disturbance and habitat loss will occur where erven and access roads are established, though limited to low botanical sensitivity areas.
- → Temporary construction-related impacts (noise, dust, and traffic disruptions) are unavoidable.
- → Some visual impact will remain due to the presence of new dwellings, though mitigated by guidelines and reduced density compared to earlier Alternatives.

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

Provide a description of the preferred technology alternative:

N/A - no technology alternatives proposed.

Provide a description of any other technology alternatives investigated.

No other alternatives have been investigated.

Provide a motivation for the preferred technology alternative.

N/A

Provide a detailed motivation if no alternatives exist.

N/A

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

N/A

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

Provide a description of the preferred operational alternative.

N/A

Provide a description of any other operational alternatives investigated.

N/A

Provide a motivation for the preferred operational alternative.

N/A

Provide a detailed motivation if no alternatives exist.

N/A

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

N/A

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

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

The 'No-Go' alternative, retaining the status quo, is not preferred for the following reasons

- → No opportunity for job creation and investment in the area (although small scale in nature)
- → No opportunity to provide safe and secure public access to the Spookdraai Beach area
- → Adhoc creation of footpaths across the site contribute to erosion and stormwater impacts
- → Risks associated with the status quo and degradation of the site over time

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

During the planning phase of the proposed development, four layout alternatives were systematically evaluated in order to identify a design that balances development objectives with environmental, social, and heritage considerations. The intent was to avoid negative impacts where possible, mitigate unavoidable impacts, and maximise positive benefits such as public access, ecological integration, and socioeconomic contributions. After the first round of public participation, a new revised layout (Alternative 5) emerged in response to concerns raised during public participation process and specialist recommendations. The evolution of the alternatives demonstrates a responsive process, informed by specialist input, legislative compliance requirements (particularly the NEM: ICMA), and public participation feedback.

No-Go

This option retains the status quo with the property in its current undeveloped state, thereby completely avoiding all potential environmental impacts. Indigenous vegetation, sensitive habitats, and coastal views would remain undisturbed. However, this alternative was not deemed reasonable or feasible because it offers no provision for housing and therefore does not align with the applicant's vision. Moreover, without active management, the site could degrade over time through informal use, alien vegetation encroachment, or uncontrolled erosion, all of which have been already indicated in the specialists' assessments.

Alternative 2

Alternative 2 proposed seven residential erven with a private road parallel to Marine Drive and limited open space below the High-Water Mark. Although this layout sought to maximise residential potential, it resulted in overly high density and the loss of indigenous vegetation, particularly in sensitive western areas. The design also failed to provide public coastal access, effectively leading to partial privatisation of the shoreline in contravention of the NEM: ICMA, which safeguards public access rights. Risks of coastal erosion and flooding were heightened by erven positioned close to the ocean, while orientation and wind exposure issues undermined the liveability of units. On balance, this alternative was considered environmentally and socially unsustainable.

Alternative 3

This option sought to improve upon Alternative 2 by considering the 5 m contour line, High-Water Mark, and designated coastal risk zones. It reduced the footprint to six erven, introduced a 1.5 m public footpath for beach access, and allocated 2 713 m^2 of private open space covering the rocky shoreline and beach. While this reflected a more cautious approach, significant shortcomings remained. The Heritage Impact Assessment (HIA) and Visual Impact Assessment (VIA) found the development would intrude on visual corridors, obstruct sea views, and degrade cultural landscape qualities. Furthermore, the proposal included zoning departures such as zero seaward building lines, undermining integration with the natural setting. Importantly, the designation of the beach as private open space (Erf 8) contravened the spirit and intent of the ICMA by effectively privatising coastal access. For these reasons, Alternative 3 was not considered sustainable.

Alternative 4

This layout reduced density compared to Alternatives 2 and 3, introducing six single residential erven, one public open space erf for coastal access, a street erf, and two private open space erven. It addressed some specialist concerns by retaining more indigenous flora, particularly within the ESA1 area on the western side, and by avoiding all coastal risk zones, in line with the WCBSP, (2017). Visual corridors and sightlines were enhanced through revised placement of dwellings, but the layout still lacked reduction of heritage and visual impacts. The allocation of Erf 8 (beach area) as private open space remained problematic, as it raised concerns of beach privatisation inconsistent with ICMA requirements. Thus, while an improvement, this alternative did not fully resolve key social and legislative issues.

Alternative 5 (Final Preferred)

Alternative 5 represents the culmination of an iterative design process informed by specialist input, statutory authority feedback, and public participation. It has evolved from previous layout options to achieve a balanced outcome that integrates environmental protection, visual sensitivity, and social accessibility while maintaining a viable and contextually appropriate development footprint. This alternative demonstrates a holistic refinement that aligns with both local and provincial spatial planning objectives and the intent of the National Environmental Management: Integrated Coastal Management Act (NEM: ICMA).

The updated layout proposes the rezoning of the site to a Sub-divisional Area comprising six (6) Medium Density Residential erven (Erven 1–6), Open Space erf (Erf 7) that provides public access to the beach, an Open Space erf (Erf 8) accommodating private recreational and landscaped areas, and one Street Zone erf (Erf 9) providing internal

vehicular circulation and access. This configuration optimises the site's developable area while consciously excluding sensitive coastal and higher botanical sensitive areas (western portion) from any form of built intervention.

A key enhancement introduced under Alternative 5 is the formal establishment of Erf 7 as Open Space, which directly addresses public and authority concerns regarding the potential privatisation of the Coastal Public Property (CPP). This measure guarantees ongoing public access to the coastline through a defined and managed walkway, thereby reinforcing the principles of inclusivity and equitable coastal access set out under Section 13 of the NEM: ICMA (Act 24 of 2008). Furthermore, this reallocation ensures that the scenic and recreational value of the area remains accessible to both residents and visitors, preserving its sense of place and community identity.

From an environmental perspective, Alternative 5 achieves a significant reduction in ecological footprint compared to earlier versions. The layout strategically aligns with the WCBSP (2017) mapping which avoids areas mapped as Ecological Support Area 1 (ESA1) (western portion) and those within high coastal risk zones as identified by specialists and confirmed through risk mapping. This ensures that the development footprint is confined to areas of low ecological sensitivity, thereby minimising direct habitat disturbance and preserving important ecological functions.

An additional improvement in Alternative 5 is the inclusion of a clear and detailed visual representation of the layout, which now illustrates not only the position and extent of each proposed residential dwelling but also the allocation of open spaces within each erf. This refinement enhances spatial clarity and allows for better understanding of how built and unbuilt areas will interact within the site. It also ensures that adequate open space buffers are maintained between individual erven and the natural coastal landscape, providing ecological connectivity and visual permeability.

The zoning for the proposed development has been revised from Single Residential to Medium Density Residential. This change enables a more compact layout that accommodates the necessary residential units within a smaller area, thereby limiting the disturbance to surrounding natural vegetation and sensitive coastal environments. The revised zoning framework also provides greater flexibility in implementing architectural and landscape design guidelines that promote visual harmony, energy efficiency, and sustainable land use within the site.

In line with this change, the residential dwellings have been repositioned further inland, situated above the 5 m contour, and located outside both the high-water mark surveyed line (HWM) and above 1-in-10-year flood line. This adjustment was made following DEA&DP Coastal Management Unit (CMU) recommendations and ensures compliance with National and Provincial coastal setback principles. By moving the development inland, potential risks associated with storm surges, coastal erosion, and sea-level rise are significantly reduced, thereby improving the safety and sustainability of the development over its lifespan. Additionally, the preferred layout alternative is in line with Section 7 of NEM:ICMA (Act 24 of 2008) protecting the Admiralty Zone and ensuring continued public access.

Architecturally, the adoption of group housing zoning parameters with 5 m street building lines and 0 m internal building lines enables the buildings to be positioned more efficiently, reducing visual sprawl and allowing greater setbacks from the coastal edge. Supporting Architectural Design Guidelines ensure that all dwellings are consistent with the natural surroundings, featuring low-profile forms, muted colour palettes, and materials that blend into the coastal landscape. Complementary Landscape Design Guidelines further mitigate potential visual impacts by integrating indigenous vegetation buffers and rehabilitating disturbed areas, ensuring that the built form blends with the natural environment over time.

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

The property is situated along the coastline of Struisbaai, within the Coastal Protection Zone (CPZ) and the Coastal Management Line (CML), highlighting its environmentally sensitive and geographically significant setting. It is important to note that Struisbaai as a whole falls within these zones due to its coastal position, and thus, development within the town must be carefully planned to ensure long-term sustainability and resilience.

The site itself comprises indigenous vegetation, sandy areas, and rocky shoreline, which contribute to its ecological and scenic value. **Botanical Assessment** revealed that some areas are already disturbed or degraded due to historical pathways, informal access routes, and stormwater discharges from culverts below Marine Drive. While these disturbances have affected soil stability and natural vegetation, slow natural revegetation is occurring in some areas. The overall habitat was classified by the botanical specialist as being in poor condition, though with sections of ecological sensitivity that required protection.

From a **Faunal** perspective, the assessment identified that while some mobile species utilise the site, no animal species of conservation concern were and identified and that would be compromised by carefully planned development.

The preferred design alternative, Alternative 5, was selected as the most balanced and sustainable option and is supported by the Heritage and Visual specialists. It achieves this by reducing overall density, avoiding high-risk coastal zones, and repositioning dwellings further inland in response to DEADP Coastal Management's recommendations. It also includes a dedicated Open Space erf with formalised pedestrian access to the shoreline, thereby ensuring that traditional fishing, recreational use, and community access are maintained in accordance with the NEM: Integrated Coastal Management Act (ICMA). This directly addresses one of the most significant concerns raised during public participation.

From a heritage perspective, Alternative 5 represents a substantial improvement over earlier layouts. The Heritage Impact Assessment (HIA) highlighted the cultural and ancestral significance of the Spookdraai area, emphasising the need to avoid privatisation of the coastal edge and minimise disturbance to areas of cultural value. By integrating open spaces along the shoreline and reorienting the residential erven to preserve view corridors, the preferred alternative respects the cultural landscape and ensures continued public connection with this historically important site.

Similarly, the Visual Impact Assessment (VIA) identified the risk of significant visual intrusion from earlier alternatives, particularly where double-storey dwellings could obstruct sea views from Marine Drive and surrounding properties. Alternative 5 addresses this by treating the property boundary differently, creating enhanced sightlines and visual corridors, and by introducing Architectural and Landscape Guidelines to mitigate bulk, height, and built form impacts. These measures ensure that the development integrates harmoniously into its coastal setting and reduces visual intrusion along one of Struisbaai's most scenic coastal drives.

2. "No-Go" areas

Explain what "no-go" area(s) have been identified during identification of the alternatives and provide the co-ordinates of the "no-go" area(s).
There are no No-Go areas that have been identified by the specialists.

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

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

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

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

Nature/ Type

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

Significance

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

Impact Magnitude	
Extent	**On site** – impacts that are limited to the boundaries of the development site.
	Local – impacts that affect an area in a radius of 20 km around the Development site.
	Regional – impacts that affect regionally important environmental resources or are experienced at a regional scale as determined by administrative boundaries, habitat type/ecosystem.
	National – impacts that affect nationally important environmental resources or affect an area that is nationally important/ or have macro-economic consequences
Duration	**Temporary** – impacts are predicted to be of short duration and intermittent/occasional.

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

Likelihood- the likelihood that an impact will occur

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

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

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

Definition of significance:

Negligible	An impact of negligible significance (or an insignificant impact) is where a resource or receptor (including people) will not be affected in any way by a particular activity, or the predicted effect is deemed to be 'negligible'.
Minor	An impact of minor significance is one where an effect will be experienced, but the impact magnitude is small (with and without mitigation) and within accepted standards, and/or the receptor is of low sensitivity/value.

Moderate	An impact of moderate significance is one within accepted limits and standards. The emphasis for moderate impacts is on demonstrating that the impact has been reduced to a level that is as low as reasonably practicable. This does not necessarily mean that 'moderate' impacts have to be reduced to 'minor' impacts, but that moderate impacts are managed effectively and efficiently.
Major	An impact of major significance is one where an accepted limit or standard may be exceeded, or large magnitude impacts occur to highly valued / sensitive resource / receptors. A goal of the EIA process is to get to a position where the Project does not have any major residual impacts.

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

Significance colour scale (if applicable):

Negative	Positive
Negligible	Negligible
Minor	Minor
Moderate	Moderate
Major	Major

Impact rating colour scale:

Negative	Positive
Negligible	Negligible
Low	Low
Medium	Medium
High	High

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

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

Summary of the Impact Assessment Process

Alternative 1 (No-Go)

Positive Impacts

- → Preservation of the existing natural environment, including indigenous vegetation and fauna.
- → No disturbance to sensitive areas, such as ecological corridors, coastal zones, or cultural heritage sites.
- → No contribution to visual or noise pollution in the area.
- → No job opportunities and therefore no economic growth.

Negative Impacts

- → Without the development, no jobs will be created during either the construction or operational phases, limiting socio-economic benefits for the local community.
- → The lack of development means no new housing will be provided to address the needs of the growing population in the area, potentially exacerbating existing housing shortages.

Alternative 2

Positive Impacts

- → Provides new residential opportunities with proximity to the coast.
- → Development could support local economic growth through construction, investments and tourism.
- → More housing development to support the growing population in the area.

Negative Impacts

- → High density increases the environmental footprint, resulting in significant vegetation clearance and habitat loss.
- → Lack of adequate open space and no provision for public coastal access, reducing social benefits.
- → Proximity of erven to the ocean creates potential risks related to coastal erosion and flooding.
- → Poor orientation for views and wind shielding reduces liveability for future residents.
- → Limited consideration of ecological sensitivity and cultural heritage features.

Alternative 3

Positive impacts

- → Incorporates measures to address some coastal risks, such as aligning development with the 5m contour line and risk zones.
- → Includes a public footpath providing access to the beach, enhancing social value.
- → Allocates private open space for the conservation of the rocky shoreline and adjacent beach areas.

Negative impacts

- → Increased density compared to the preferred alternative, leading to moderate vegetation clearance and habitat disturbance.
- → Departures from zoning guidelines could result in visual and aesthetic impacts.
- → Development footprint remains too close to sensitive coastal areas, increasing vulnerability to erosion and flooding.
- → Poor alignment with Heritage and Visual Impact Assessments due to the proximity of structures to the coastline and inadequate integration into the natural landscape.

Alternative 4 (previously preferred)

Positive impacts

- → Reduced density minimizes environmental disturbance, ensuring better conservation of indigenous vegetation and habitat.
- → Substantial allocation of open space supports ecological corridors and enhances biodiversity.
- → Includes an Open Space Zone, improving public coastal access and recreational opportunities.
- → Design integrates with the natural landscape, reducing visual and aesthetic impacts.
- → Coastal risk areas are avoided, enhancing long-term sustainability and safety.
- → Thoughtful orientation of erven optimizes views and provides better protection from prevailing winds, increasing liveability.

Negative impacts

- → Not enough information provided to fully assessment impact particularly relating to Visual and Heritage impacts.
- → Some disturbance to the natural environment due to construction activities.
- → Limited encroachment on ecological areas, though minimized compared to other alternatives.
- → Potential for localized noise and air pollution during construction.

Alternative 5 (Preferred)

Positive impacts

- → Reduced overall development footprint compared to earlier layouts, ensuring fewer erven and greater ecological integration while still meeting residential needs.
- → Medium density housing zoning replaces traditional single residential erven, enabling dwellings to be positioned further inland (±3 m landward) and clustered more efficiently. This reduces pressure on sensitive coastal edges.
- → Responds directly to DEADP Coastal Management recommendations by excluding high-risk areas and aligning all development landward of the most vulnerable zones, ensuring compliance with NEM: ICMA coastal set-back requirements.
- → Larger open space erf (Erf 7) formally secures coastal access for recreation, fishing, and walking, directly addressing community concerns and aligning with ICMA provisions safeguarding public access rights.
- → Landscape Development and Architectural Guidelines integrated into the plan reduce visual intrusion, ensure building form is harmonious with the coastal setting, and enhance the sense of place.
- → Retention of natural vegetation within designated open space erven ensuring minimisation of vegetation loss, biodiversity, and scenic character.

- → Stormwater and erosion management measures integrated into the design protect residential, public spaces and coastal environment, supporting long-term environmental sustainability.
- → Orientation of erven optimises views while improving protection from prevailing winds, ensuring liveability and functional urban design.
- → Incorporates recommendations from botanical, visual, heritage, faunal specialists, ensuring the plan is technically defensible and environmentally compliant.
- → Addresses key public objections raised in earlier PPP rounds (density, ecological disturbance, and loss of access), demonstrating meaningful evolution of the project in line with stakeholder input.

Negative impacts

- → Localised vegetation disturbance and habitat loss will occur where erven and access roads are established, though limited to low botanical sensitivity areas.
- → Temporary construction-related impacts (noise, dust, and traffic disruptions) are unavoidable.
- → Some visual impact will remain due to the presence of new dwellings, though mitigated by guidelines and reduced density compared to earlier Alternatives.

NO-GO

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**1. Socioeconomic impacts** No Job creation (-)
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term (construction phase)
Consequence of impact or risk:	Negative consequences include risks of unemployment, no investment opportunities and no economic growth potential
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	N/A
Indirect impacts:	Unemployment for unskilled labour.
Cumulative impact prior to mitigation:	Unemployment for unskilled labour.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (-)
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	→ Prioritize local hiring to maximize job creation for the community. → Ensure construction vehicles are adequately maintained, with proper scheduling and designated routes to minimize disruptions. → Ensure loads are securely fastened to prevent accidents or loss during transportation, which could impact public roads and road users.
Residual impacts:	Continued unemployment opportunities during the construction phase.
Cumulative impact post mitigation:	No job opportunities during construction, with no significant lasting effects post-mitigation.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**2. Transport impact** Increase in traffic volumes due to background traffic growth.
Nature of impact:	

Extent and duration of impact:	Regional, medium to long-term
Consequence of impact or risk:	Very-low
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	Reversible
Indirect impacts:	None
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Neutral
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Routine road maintenance by the Roads Authority.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Neutral
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**2. Visual impacts** **The site remains unchanged, and no development occurs.**
Nature of impact:	Neutral to positive – no new structures are introduced that could alter the landscape or visual character.
Extent and duration of impact:	Local: Permanent – The site's visual character remains unchanged indefinitely.
Consequence of impact or risk:	The status quo remains.
Probability of occurrence:	Definite – No development means the current visual landscape remains unchanged.
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	Not applicable – Since there is no change
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Neutral or slightly positive – The absence of development means no additional visual disturbance to the landscape.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	N/A
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A

Proposed mitigation:	N/A - No mitigation required as there is no development.
Residual impacts:	Neutral - Sense of place of the coastal landscape is maintained.
Cumulative impact post mitigation:	Neutral- Character of the coastal cultural landscape (context) is maintained. However, there is risk of informal footpaths being formed.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Neutral
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**3. Paleontological Heritage** No development takes place; therefore, no potential discovery of fossil bones and archaeological material.
Nature of impact:	Neutral – No disturbance or excavation, meaning no impact on paleontological resources.
Extent and duration of impact:	Local; Regional and National: The absence of excavation means no potential for new fossil discoveries that could contribute to scientific knowledge.
Consequence of impact or risk:	No disturbance to paleontological heritage, but also no potential for new scientific discoveries.
Probability of occurrence:	Definite – Since no development occurs, no fossils will be discovered or studied.
Degree to which the impact may cause irreplaceable loss of resources:	N/A - No excavation means no fossils are lost, but also no new information is gained.
Degree to which the impact can be reversed:	Not applicable – The status quo is maintained.
Indirect impacts:	Loss of opportunity for scientific discovery and contribution to paleontological knowledge
Cumulative impact prior to mitigation:	Neutral – No excavation means no destruction, but also no scientific gain.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	N/A - No impact on existing paleontological resources.
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	N/A
Residual impacts:	No loss of fossils and the associated scientific implications
Cumulative impact post mitigation:	Positive – No fossil material is lost due to excavation.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**4. Archaeological Impact** No development means no ground disturbance, thus no potential discovery of archaeological material.

Nature of impact:	Neutral – No impact on archaeological resources due to the absence of excavation or construction activities.
Extent and duration of impact:	Local; Regional and National – The status quo remains unchanged over the long term.
Consequence of impact or risk:	No consequence as no archaeological resources will be disturbed or discovered.
Probability of occurrence:	None – No excavation means no chance of disturbing or uncovering archaeological resources.
Degree to which the impact may cause irreplaceable loss of resources:	None – No development means no loss of potential archaeological or paleontological material.
Degree to which the impact can be reversed:	Not applicable – No impact occurs, so no need for reversal.
Indirect impacts:	No indirect impacts, as the site remains undisturbed.
Cumulative impact prior to mitigation:	No cumulative impact – the site retains its existing archaeological integrity.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Neutral – Since no development occurs, no archaeological risk exists.
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	N/A
Residual impacts:	No loss of archaeological resources and no potential discovery of Archaeological sites.
Cumulative impact post mitigation:	Negative – No discovery of new archaeological materials, ensuring preservation of any unknown resources.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**5. Heritage Impact** *Palaeontology* No development means no ground disturbance, thus no potential discovery of fossil bones *Archaeology* No development means no ground disturbance, thus no potential discovery of archaeological material. *Visual Impacts* The site remains unchanged, and no development occurs.
Nature of impact:	*Palaeontology* – Positive *Archaeology* – Neutral *Visual* – Neutral
Extent and duration of impact:	Local; Permanent; Regional- No impact on archaeological resources due to the absence of excavation or construction activities. No potential discovery of fossils and uncovering significant heritage resource.
Consequence of impact or risk:	*Palaeontology* – Loss of material palaeontological heritage.

	Archaeology - No consequence as no archaeological resources will be disturbed or discovered. *Visual/Heritage Resources* - No consequence as no visual impacts
Probability of occurrence:	*Palaeontology* – Definite *Archaeology* – None *Visual/ Heritage Resource* – Definite
Degree to which the impact may cause irreplaceable loss of resources:	*Palaeontology* – N/A *Archaeology* – N/A *Visual/ Heritage Resources* - N/A
Degree to which the impact can be reversed:	*Palaeontology* – N/A *Archaeology* – N/A. *Visual/ Heritage* – N/A
Indirect impacts:	*Palaeontology* – Loss of opportunity for scientific discovery and contribution to paleontological knowledge. *Archaeology* – No indirect impacts, as the site remains undisturbed. Significant threat to local Stone Age archaeological resources. *Visual* – N/A
Cumulative impact prior to mitigation:	*Palaeontology* - Neutral – No excavation means no destruction, but also no scientific gain. *Archaeology* – No cumulative impact – the site retains its existing archaeological integrity. *Visual/ Heritage* – Neutral or slightly positive – The absence of development means no additional visual disturbance to the landscape.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Palaeontology* – N/A - No impact on existing paleontological resources. *Archaeology* – Low- Since no development occurs, no archaeological risk exists. *Visual* – N/A
Degree to which the impact can be avoided:	*Palaeontology* – N/A *Archaeology* – N/A *Visual* – N/A
Degree to which the impact can be managed:	*Palaeontology* – N/A *Archaeology* – N/A *Visual* – N/A
Degree to which the impact can be mitigated:	***Palaeontology*** – No management required ***Archaeology*** – No management required. ***Visual*** – No management required.
Proposed mitigation:	N/A
Residual impacts:	*Palaeontology* – No loss of archaeological resources and no potential discovery of Archaeological sites. *Archaeology* – No significant residual impacts, as the archaeological resources are not significantly threatened by the development. No potential discovering of archaeological resources. *Visual* – Sense of place of the coastal landscape is maintained.
Cumulative impact post mitigation:	*Palaeontology* – Negative – No discovery of new archaeological materials, ensuring preservation of any unknown resources.

		Archaeology – No discovery of new archaeological materials, ensuring preservation of any unknown resources. *Visual* – Neutral - Character of the coastal cultural landscape (context) is maintained. However, there is risk of informal footpaths being formed.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Palaeontology*	Low (-)
	Archaeology	Low (-)
	Visual	Neutral
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:		**6. Botanical/ Terrestrial Biodiversity impacts** No alteration of existing botanical/terrestrial biodiversity.
Nature of impact:		Positive; No impact, as the status quo remains unchanged.
Extent and duration of impact:		Local, Regional, and National – the natural environment remains intact over the long term
Consequence of impact or risk:		No change in the existing biodiversity conditions on site.
Probability of occurrence:		No impact, as there is no development.
Degree to which the impact may cause irreplaceable loss of resources:		No loss of biodiversity resources, as they remain undisturbed. However, current conditions still persist on site.
Degree to which the impact can be reversed:		No impact, as there is no alteration to the environment.
Indirect impacts:		None
Cumulative impact prior to mitigation:		The natural environment remains unchanged.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		Low (as no new impacts arise).
Degree to which the impact can be avoided:		N/A
Degree to which the impact can be managed:		N/A
Degree to which the impact can be mitigated:		N/A
Proposed mitigation:		N/A
Residual impacts:		No loss of biodiversity as a result of no development. However, the existing development
Cumulative impact post mitigation:		No disturbance of existing environmental resources. However, there are risks of informal settlements and informal paths
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		Neutral
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:		**7. Coastal environment** No disturbance to the natural coastal environment, ecosystems, and biodiversity. No change in land use.
Nature of impact:		Neutral

Extent and duration of impact:	Local; Regional and National – The site remains unchanged, preserving existing ecological functions and processes.
Consequence of impact or risk:	No potential loss or alteration of natural habitats, biodiversity, or ecosystem services.
Probability of occurrence:	No development means no impact on the coastal environment.
Degree to which the impact may cause irreplaceable loss of resources:	No irreplaceable loss, as the natural state is maintained.
Degree to which the impact can be reversed:	No impact to reverse, as no disturbance occurs.
Indirect impacts:	Ecosystem integrity and coastal processes remains. No disruption of coastal habitat connectivity.
Cumulative impact prior to mitigation:	No negative cumulative impacts. Maintains ecological stability and natural coastal dynamics.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – No impact on the coastal environment due to lack of development.
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	No mitigations required. However, the site has been disturbed in some areas by informal footpaths and stormwater outlets, if these still persist, there is potential for future disturbances and degradation on site. Restoration efforts could be considered to prevent ongoing degradation.
Residual impacts:	No vegetation loss will take place. However, if the site is not developed, it will miss out on opportunities for vegetation restoration within the ESA area and could further degrade due to unmanaged disturbances.
Cumulative impact post mitigation:	Minimal ecological change, but potential for unmanaged degradation in disturbed areas.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Neutral
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**1. Socioeconomic impacts** → Loss of potential economic investment and job creation opportunities. → No improvement in infrastructure and services that could have benefited the local community. → No contribution to local tourism or economic growth. → Potential for continued degradation of the site due to unmanaged human activities (e.g., informal footpaths, stormwater runoff). → Missed opportunity for ecological restoration, particularly within Ecological Support Areas (ESAs). → Lack of formal control over land use, possibly leading to unauthorized activities or illegal dumping.

	→ Socioeconomic impacts due to the loss of potential benefits from the proposed development.
Nature of impact:	Negative
Extent and duration of impact:	Local (limited to the site and surrounding area); Long-term – as long as the site remains undeveloped.
Consequence of impact or risk:	No direct environmental harm, but potential negative social and economic consequences due to lost opportunities for investment and employment. Existing site disturbances (e.g., informal pathways, stormwater erosion) may persist.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Low – No irreplaceable ecological loss, as the site remains in its current state. However, lost economic and social opportunities may not be recoverable.
Degree to which the impact can be reversed:	N/A
Indirect impacts:	No contribution to local economic growth, job creation, or improved services.
Cumulative impact prior to mitigation:	No contribution to local economic growth, job creation, or improved services.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low - Negative implications for socioeconomic development.
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	No mitigation required
Residual impacts:	No investments in the area, no job opportunities.
Cumulative impact post mitigation:	Negative, as potential benefits from development (e.g., employment, infrastructure, tourism) will not be realized.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**3. Transport impact** Increase in traffic volumes due to background traffic growth.
Nature of impact:	Negative
Extent and duration of impact:	Regional, medium to long-term
Consequence of impact or risk:	Very-low
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	Reversible
Indirect impacts:	None
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Neutral

Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Routine road maintenance by the Roads Authority.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Neutral
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**2. Visual impacts** No change in visual character; the site remains in its natural state.
Nature of impact:	Neutral.
Extent and duration of impact:	Localized, long-term—natural landscape remains undisturbed.
Consequence of impact or risk:	No adverse visual impact. The site's natural aesthetics and scenic value are preserved.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	No irreplaceable loss, as the natural state is maintained.
Degree to which the impact can be reversed:	N/A
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	visual character of the broader coastal region is maintained.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	N/A
Residual impacts:	No change—natural conditions are maintained
Cumulative impact post mitigation:	No change—natural conditions are maintained
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (+)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**8. Coastal environment** No change in land use.
Nature of impact:	Neutral
Extent and duration of impact:	Local; Regional and National – The site remains unchanged, preserving existing ecological functions and processes.
Consequence of impact or risk:	No potential loss or alteration of natural habitats, or ecosystem services.

Probability of occurrence:	No development means no impact on the coastal environment.
Degree to which the impact may cause irreplaceable loss of resources:	No irreplaceable loss, as the natural state is maintained.
Degree to which the impact can be reversed:	No impact to reverse, as no disturbance occurs.
Indirect impacts:	Ecosystem integrity and coastal processes remains. No disruption of coastal habitat connectivity.
Cumulative impact prior to mitigation:	No negative cumulative impacts. Maintains ecological stability and natural coastal dynamics.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – No impact on the coastal environment due to lack of development.
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	→ No mitigations required. However, the site has been disturbed in some areas by informal footpaths and stormwater outlets, if these still persist, there is potential for future disturbances and degradation on site. Restoration efforts could be considered to prevent ongoing degradation.
Residual impacts:	No vegetation loss will take place. However, if the site is not developed, it will miss out on opportunities for vegetation restoration within the ESA area and could further degrade due to unmanaged disturbances.
Cumulative impact post mitigation:	Minimal ecological change, but potential for unmanaged degradation in disturbed areas.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Neutral
DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	N/A
Nature of impact:	-
Extent and duration of impact:	-
Consequence of impact or risk:	-
Probability of occurrence:	-
Degree to which the impact may cause irreplaceable loss of resources:	-
Degree to which the impact can be reversed:	-
Indirect impacts:	-
Cumulative impact prior to mitigation:	-
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-
Degree to which the impact can be avoided:	-
Degree to which the impact can be managed:	-
Degree to which the impact can be mitigated:	-
Proposed mitigation:	-
Residual impacts:	-
Cumulative impact post mitigation:	-

Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-

ALTERNATIVE 2

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**1. Socioeconomic impacts** Job creation (+)
Nature of impact:	**Job creation;** Positive
Extent and duration of impact:	Local; short-term (construction phase)
Consequence of impact or risk:	**Job Creation:** Positive consequences as it brings economic benefits to local residents, reducing unemployment rates temporarily.
Probability of occurrence:	**Job creation:** Definite
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Low
Indirect impacts:	Impact on public roads users
Cumulative impact prior to mitigation:	Cumulative impacts on roads and public users
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (+)
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Prioritize local hiring to maximize job creation for the community. → Ensure construction vehicles are adequately maintained, with proper scheduling and designated routes to minimize disruptions. → Ensure loads are securely fastened to prevent accidents or loss during transportation, which could impact public roads and road users.
Residual impacts:	**Job Creation:** Continued employment during the construction phase, contributing positively to the local economy.
Cumulative impact post mitigation:	**Job Creation:** Positive long-term economic benefits due to employment during construction.

Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High +ve
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**2. Transport impact** Traffic delay and congestion at intersections and road networks during the construction phase.
Nature of impact:	Negative
Extent and duration of impact:	Local, short-term
Consequence of impact or risk:	Very-low
Probability of occurrence:	Possible
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	Reversible
Indirect impacts:	None
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Heavy construction traffic should not be allowed on the public road network during the typical a.m. and p.m. peak hours.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**3. Dust** The dust could be generated during the site preparation.
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term
Consequence of impact or risk:	Visual impacts Nuisance for residents adjacent to the site as well as road users.
Probability of occurrence:	Likely

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

Proposed mitigation:	→ Limit noise levels (e.g. install and maintain silencers on machinery). → Provide protective wear for workers i.e. ear plugs. → Ensure that construction vehicles and machinery are maintained regularly to reduce noise generation. → Restrict construction to normal working hours
Residual impacts:	None
Cumulative impact post mitigation:	Typical noise impacts associated with a construction site
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**5. Visual impacts** Visual Impact may be expected – resulting directly from site clearance, bulk earthworks and removal of existing vegetation; with construction vehicles / building activity causing noise / dust.
Nature of impact:	Negative (visual disturbance to status quo), foreground construction activity.
Extent and duration of impact:	Local: Mid-term
Consequence of impact or risk:	Visual disturbance of status quo, foreground construction activity
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium-High – Where visual and scenic resources are affected to a limited extent only.
Degree to which the impact can be reversed:	Medium
Indirect impacts:	Increased activities associated with construction (later in time, elsewhere in space)
Cumulative impact prior to mitigation:	Development activity on adjacent properties.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High – Very High (-)
Degree to which the impact can be avoided:	Low-Medium
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low- Medium
Proposed mitigation:	→ Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced. → Addition it is recommended that the landscape and visual indicator are implemented, and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines on page 52 of the Visual Impact Assessment must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact.

	→ Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas. → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views. → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow. → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a "solid" wall architecture (fig. 61). All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property. → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".	
Residual impacts:	Change in sense of place of the coastal landscape	
Cumulative impact post mitigation:	Change in character of the coastal cultural landscape (context)	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (-)	High (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:	**6. Paleontological Heritage** Loss of fossil bones and archaeological material from excavations in the coversands and beach deposits.	
Nature of impact:	Positive	
Extent and duration of impact:	Local; Regional and National: Permanent	
Consequence of impact or risk:	Loss of material palaeontological heritage.	
Probability of occurrence:	Possible	
Degree to which the impact may cause irreplaceable loss of resources:	Significant Loss may still occur.	
Degree to which the impact can be reversed:	Irreversible	
Indirect impacts:	Enriched landscape geohistory.	

Cumulative impact prior to mitigation:	Some fossils are rescued for posterity and available for scientific study.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – Medium Positive
Degree to which the impact can be avoided:	Low. The locations of fossil bones in the deposits cannot be predicted.
Degree to which the impact can be managed:	Low. There is a high risk of valuable fossils being lost despite management actions to mitigate such loss.
Degree to which the impact can be mitigated:	Moderate
Proposed mitigation:	→ For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. → It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the proposed development. → The Fossil Finds Procedure provides guidelines to be followed in the event of fossil bone finds in the excavations. The works supervisor/foreman and workers involved in excavating the building foundations, infrastructure trenches and stormwater drainage must be informed of the need to watch for fossils and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find. → If a significant occurrence of fossil bones in a palaeontological context is discovered a professional palaeontologist must be appointed to collect them and to record their contexts. Said palaeontologist must also undertake the recording of the stratigraphic context and sedimentary geometry of the exposure, the sampling of ambient small fossil content and the compilation of the report for distribution to Heritage Western Cape, SAHRA, the approved curatorial institution and local heritage interest groups. → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.

Residual impacts:	Permanent loss of fossils and the associated scientific implications	
Cumulative impact post mitigation:	Positive – Discovery of new fossil evidence	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (+)	Medium (+)
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:	**7. Archaeological Impact** Buried shell middens, and unmarked Khoisan remains may be uncovered or intercepted during excavations for building foundations.	
Nature of impact:	Negative	
Extent and duration of impact:	Local: short-term	
Consequence of impact or risk:	Excavations for building foundations and services may uncover buried archaeological deposits.	
Probability of occurrence:	Probable	
Degree to which the impact may cause irreplaceable loss of resources:	Low	
Degree to which the impact can be reversed:	High	
Indirect impacts:	Archaeological resources being discovered.	
Cumulative impact prior to mitigation:	Archaeological resources being discovered.	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low	
Degree to which the impact can be avoided:	High	
Degree to which the impact can be managed:	High	
Degree to which the impact can be mitigated:	High	
Proposed mitigation:	→ No archaeological mitigation is needed prior to construction excavations commencing. → Archaeological monitoring of building foundations a services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist. → The above recommendations must be incorporated into the Environmental Management Plan (EMP) for the proposed development.	
Residual impacts:	Potential discovery of Archaeological sites.	
Cumulative impact post mitigation:	Potential discovery of Archaeological sites.	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very Low (-)	
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:	**8. Heritage Impact** *Palaeontology*	

	The possible presence of fossils in the subsurface does not have an a priori influence on the decision to proceed with the proposed development. *Archaeology* Buried shell middens, and unmarked Khoisan remains may be uncovered or intercepted during excavations for building foundations and services but the probability of this occurring, is considered to be Low. *Visual Impacts* The development is proposed to occupy a portion of the coastline which is pristine and with no adjacent development to form a continuous pattern.
Nature of impact:	*Palaeontology* – Positive *Archaeology* – Negative *Visual* – Negative
Extent and duration of impact:	Local; Permanent
Consequence of impact or risk:	*Palaeontology* – Loss of material palaeontological heritage. *Archaeology* – The proposed development on the property will likely impact the on important Stone Age archaeological resources. *Visual/Heritage Resources* – Impact on visual heritage due to development in a pristine, undeveloped coastal area.
Probability of occurrence:	*Palaeontology* – Likely *Archaeology* – Unlikely *Visual/ Heritage Resource* – Likely
Degree to which the impact may cause irreplaceable loss of resources:	*Palaeontology* – Significant loss may still occur. *Archaeology* – Buried shell middens, and unmarked Khoisan remains may be uncovered or intercepted during excavations for building foundations and services but the probability of this occurring, is considered to be Low. *Visual/ Heritage Resources* - Irreplaceable loss of pristine, undeveloped coastal aesthetic due to development.
Degree to which the impact can be reversed:	*Palaeontology* – Irreversible *Archaeology* – Reversible, provided excavation protocols are followed and materials are conserved appropriately. *Visual/ Heritage* – Irreversible, as once the development occurs, the pristine coastline cannot be restored.
Indirect impacts:	*Palaeontology* – Enriched landscape geo-history *Archaeology* – Indications are that a proposed housing development on re Farm 218 – RE (seafront) does not pose a significant threat to local Stone Age archaeological resources. *Visual* – Loss of coastal aesthetic affects community access to a natural setting, which may lead to social impacts on visitors and residents.
Cumulative impact prior to mitigation:	*Palaeontology* – Permanent loss of fossils and the associated scientific implications.

	Archaeology – Indications are that a proposed housing development on re Farm 218 – Re (seafront) does not pose a significant threat to local Stone Age archaeological resources. *Visual/ Heritage* – Cumulative impacts on visual intrusion due to loss of pristine, undeveloped coastal aesthetics.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Palaeontology* – Low *Archaeology* – Low *Visual* – Medium
Degree to which the impact can be avoided:	*Palaeontology* – Low. The locations of fossil bones in the deposits cannot be predicted. *Archaeology* – Low. The probability of uncovering significant archaeological remains is low. *Visual* – Low. The impact on visual heritage cannot be entirely avoided due to the coastal location of the development.
Degree to which the impact can be managed:	*Palaeontology* – Low. There is a high risk of valuable fossils being lost despite management actions to mitigate such loss. *Archaeology* – Low. The development does not pose a significant threat to local Stone Age archaeological resources, but monitoring during construction is necessary. *Visual* – Moderate. Management through landscaping, architectural guidelines, and adherence to visual planning can reduce visual intrusion.
Degree to which the impact can be mitigated:	*Palaeontology* – Moderate. Mitigation efforts can reduce the likelihood of irreversible loss of fossils, but the impact cannot be fully mitigated. *Archaeology* – Low. No significant mitigation is required, but archaeological monitoring is recommended during construction. *Visual* – Moderate. Effective design and planning (including appropriate landscaping, visual screening, and construction controls) can reduce visual impacts.
Proposed mitigation:	*Palaeontology* → For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP) is included in the Environmental Management Plan (EMP) for the proposed development. → The field supervisor/foreman and workers involved in excavations must be informed of the need to watch for fossil bones and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby

	archaeologist or palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find. → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense *Archaeology* → No archaeological mitigation is needed prior to construction excavations commencing. → Archaeological monitoring of building foundations and services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist. → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist. *Visual* → Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced. → Addition it is recommended that the landscape and visual indicator are implemented, and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines on page 52 of the Visual Impact Assessment must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact. → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas.

<table>
<tr><td colspan="2"></td><td colspan="2">→ Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public
→ Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views.
→ Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow.
→ The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a “solid” wall architecture (fig. 61). All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property.
→ The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated “green roofs”.</td></tr>
<tr><td colspan="2">Residual impacts:</td><td colspan="2">*Palaeontology* – Positive, as the development could lead to the discovery of new fossil records.
Archaeology – No significant residual impacts, as the archaeological resources are not significantly threatened by the development.
Visual – Ongoing visual impact on the coastal landscape due to the development but mitigated by design.</td></tr>
<tr><td colspan="2">Cumulative impact post mitigation:</td><td colspan="2">*Palaeontology* – Potential discovery of new fossil records.
Archaeology – No significant cumulative impact, as mitigation measures ensure the conservation of archaeological resources.
Visual – Cumulative impacts on visual aesthetics but mitigated through the careful planning and implementation of design guidelines.</td></tr>
<tr><td rowspan="3">Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)</td><td>***Palaeontology***</td><td>Low (+)</td><td>Medium (+)</td></tr>
<tr><td>***Archaeology***</td><td colspan="2">Low (-)</td></tr>
<tr><td>***Visual***</td><td>Medium (-)</td><td>High (-)</td></tr>
</table>

	Overall Heritage	High (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:		**9. Botanical/ Terrestrial Biodiversity impacts** Impact on botanical and biodiversity aspects of the site.
Nature of impact:		Negative: Loss of natural vegetation i.e. Southwestern Strandveld
Extent and duration of impact:		Local; Long-term
Consequence of impact or risk:		Loss of Southwestern Strandveld
Probability of occurrence:		Probable
Degree to which the impact may cause irreplaceable loss of resources:		Low
Degree to which the impact can be reversed:		Irreversible
Indirect impacts:		None
Cumulative impact prior to mitigation:		Contribution to loss of Southwestern Strandveld
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		High negative
Degree to which the impact can be avoided:		Very Low
Degree to which the impact can be managed:		Low
Degree to which the impact can be mitigated:		Low
Proposed mitigation:		On-site mitigation would not be possible since virtually the entire site would be developed.
Residual impacts:		High negative
Cumulative impact post mitigation:		Low negative
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		High (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:		**10. Coastal environment** The proposed development may result in disturbance to the coastal environment, impacting the delicate coastal ecosystem, including marine habitats, and adjacent shoreline areas.
Nature of impact:		Negative
Extent and duration of impact:		Local; short-term
Consequence of impact or risk:		Medium: The consequences include potential degradation of coastal habitats, disruption to coastal ecosystems, disturbance to flora and fauna, and possible loss of beach area due to coastal erosion. These consequences may result in loss of biodiversity and the aesthetic value of the area.

Probability of occurrence:	Medium- High: Given the proximity of the site to sensitive coastal areas and the nature of the proposed development, there is a high probability of impact.	
Degree to which the impact may cause irreplaceable loss of resources:	Medium-High	
Degree to which the impact can be reversed:	Medium	
Indirect impacts:	Potential pollution and increased human activity may impact the coastal environment including marine life.	
Cumulative impact prior to mitigation:	High: habitat disturbance, increased foot traffic, pollution, and additional stress on coastal ecosystems.	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High	
Degree to which the impact can be avoided:	Medium	
Degree to which the impact can be managed:	High: Effective management practices, such as coastal setback regulations, pollution control, and erosion prevention measures, can greatly reduce the negative impact on the coastal environment.	
Degree to which the impact can be mitigated:	Medium-High	
Proposed mitigation:	→ Avoidance of sensitive coastal areas, such as high-water mark, coastal risk areas and critical habitats. → Establishment of restricted zones for public access and careful planning of the public footpath to minimize disturbance. → Regular monitoring of the coastal environment for signs of habitat degradation, pollution, and erosion.	
Residual impacts:	Even after mitigation, some residual impacts may remain, particularly in terms of slight disturbances to the coastal environment during construction and possible slow recovery of ecosystems.	
Cumulative impact post mitigation:	Low- Medium	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (-)	High (-)
POST-CONSTRUCTION PHASE		
Potential impact and risk:	**1. Socioeconomic impacts** The post-construction phase of the development is expected to have several socioeconomic impacts, including the creation of job opportunities, stimulation of local businesses, and potential changes in property values and community dynamics. The presence of a new development can affect local employment, access to services, and the cost of living for both current and new residents.	
Nature of impact:	Positive	
Extent and duration of impact:	Local; Long-term	

Consequence of impact or risk:	The consequences could include positive effects, such as economic growth, increased property values, and improved infrastructure.
Probability of occurrence:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	Changes in the local labour market, with increased demand for both skilled and unskilled workers, potentially raising wage levels but also increasing the cost of living.
Cumulative impact prior to mitigation:	Job creation and improved infrastructure for the local community.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High Positive
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Engagement with local stakeholders to understand their needs and ensure the development benefits the local community. → Provision of affordable housing and support for local businesses to prevent displacement and encourage inclusive economic growth
Residual impacts:	Residual impacts may include ongoing changes to the local economy, such as higher property values and increased demand for goods and services, which could lead to higher living costs.
Cumulative impact post mitigation:	Job creation and improved infrastructure will provide long-term benefits to the local community.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (+)
POST-CONSTRUCTION	
Potential impact and risk:	**2. Transport impact** Traffic delay and Increase in traffic volumes due to background traffic growth.
Nature of impact:	Negative
Extent and duration of impact:	Local, short-term
Consequence of impact or risk:	Very-low
Probability of occurrence:	Possible
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	Reversible
Indirect impacts:	None

Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Routine road maintenance by the Roads Authority.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**3. Botanical/ Terrestrial Biodiversity impacts** Limited further loss of plant species found in Overberg Dune Strandveld.
Nature of impact:	No further impact after completion of construction
Extent and duration of impact:	Local; long- term.
Consequence of impact or risk:	The degradation or destruction of remaining indigenous vegetation may lead to a loss of biodiversity, disruption of ecological functions, and reduced aesthetic and recreational value.
Probability of occurrence:	Medium. There is a reasonable likelihood that post-construction activities or passive impacts (e.g., invasive species, human activity) could affect the indigenous vegetation if left unmanaged.
Degree to which the impact may cause irreplaceable loss of resources:	Medium-High While some indigenous vegetation may be restored, the loss of specific species or ecological functions may be irreversible if not actively managed or protected.
Degree to which the impact can be reversed:	Medium
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Medium-High
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	N/A
Residual impacts:	Medium
Cumulative impact post mitigation:	Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (-)

POST-CONSTRUCTION PHASE	
Potential impact and risk:	**4. Visual impacts** Contemporary layer added to the cultural landscape. Change in character of the coastal cultural landscape.
Nature of impact:	Negative: Intrusion of buildings in the foreground of a sensitive coastal landscape. Disturbance of an intact coastal landscape.
Extent and duration of impact:	Local; Long term
Consequence of impact or risk:	→ Alteration of the natural coastal aesthetic. → Potential visual intrusion for surrounding properties and public areas. → Loss of the original character and sense of place for the area.
Probability of occurrence:	High
Degree to which the impact may cause irreplaceable loss of resources:	Medium- High: The visual quality of the natural environment is altered, but no irreplaceable physical resources are directly impacted.
Degree to which the impact can be reversed:	Low: Mitigation measures such as landscaping, architectural design, and strategic placement of buildings and infrastructure can reduce visual impacts but cannot fully restore the original coastal landscape.
Indirect impacts:	Altered community perception of the area's character and desirability.
Cumulative impact prior to mitigation:	Medium-High: Combined with other developments in the area, the cumulative effect could significantly alter the visual character of the broader coastal region.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High
Degree to which the impact can be avoided:	Medium- High: Avoidance is possible through careful planning and design, such as limiting development to less visually intrusive areas.
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	→ Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced. → Addition it is recommended that the landscape and visual indicator are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the

	limitations of the site. The proposed Landscape and Architectural Guidelines on page 52 of the Visual Impact Assessment must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact. → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas. → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views. → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow. → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a "solid" wall architecture (fig. 61). All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property. → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".	
Residual impacts:	Some alteration of the visual landscape will remain, but it can be minimized with effective mitigation. Reduced impact on the sense of place compared to unmitigated scenarios.	
Cumulative impact post mitigation:	There will be some cumulative impact but should mitigation measures be applied this will in time be minimised - Low to Very-low negative.	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (-)	High (-)
POST-CONSTRUCTION PHASE		
Potential impact and risk:	**5. Coastal environment**	

	Alteration of the coastal landscape and potential degradation of coastal habitats due to increased human activity, infrastructure maintenance, and waste generation.	
Nature of impact:	Negative	
Extent and duration of impact:	Local; long-term	
Consequence of impact or risk:		
Probability of occurrence:	Moderate to high, depending on the level of ongoing management and adherence to mitigation measures.	
Degree to which the impact may cause irreplaceable loss of resources:	Medium	
Degree to which the impact can be reversed:	Moderate; some impacts, such as vegetation loss, can be reversed with active restoration, but others, such as habitat degradation, may require significant effort or remain irreversible.	
Indirect impacts:	Changes to the aesthetic and recreational value of the coastline.	
Cumulative impact prior to mitigation:	High: The coastal environmental may already be under pressure from other developments and stormwater outlets.	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High	
Degree to which the impact can be avoided:	Moderate; impacts can be minimized through careful planning and adherence to coastal management guidelines.	
Degree to which the impact can be managed:	High	
Degree to which the impact can be mitigated:	High	
Proposed mitigation:	→ Establish buffer zones to protect sensitive coastal areas. → Implement long-term monitoring of coastal processes and habitats. → Restrict access to ecologically sensitive areas using signage or fencing. → Restore disturbed vegetation with indigenous coastal plant species. → Regularly remove waste and debris from the site to prevent pollution.	
Residual impacts:	Minor disturbance to natural processes due to human presence and infrastructure maintenance. Reduced habitat quality in some areas if restoration is not fully effective.	
Cumulative impact post mitigation:	Low- Medium	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (-)	High (-)
DECOMMISSIONING AND CLOSURE PHASE		
Potential impact and risk:	N/A	
Nature of impact:	-	
Extent and duration of impact:	-	

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

ALTERNATIVE 3

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**1. Socioeconomic impacts** Job creation (+)
Nature of impact:	**Job creation;** Positive
Extent and duration of impact:	Local; short-term (construction phase)
Consequence of impact or risk:	**Job Creation:** Positive consequences as it brings economic benefits to local residents, reducing unemployment rates temporarily.
Probability of occurrence:	**Job creation:** Definite
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Low
Indirect impacts:	Impact on public roads users
Cumulative impact prior to mitigation:	Cumulative impacts on roads and public users
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (+)
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High

Proposed mitigation:	→ Prioritize local hiring to maximize job creation for the community. → Ensure construction vehicles are adequately maintained, with proper scheduling and designated routes to minimize disruptions. → Ensure loads are securely fastened to prevent accidents or loss during transportation, which could impact public roads and road users.
Residual impacts:	**Job Creation:** Continued employment during the construction phase, contributing positively to the local economy.
Cumulative impact post mitigation:	**Job Creation:** Positive long-term economic benefits due to employment during construction.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High positive
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**2. Transport impact** Traffic delay and congestion at intersections and road networks during the construction phase.
Nature of impact:	Negative
Extent and duration of impact:	Local, short-term
Consequence of impact or risk:	Very-low
Probability of occurrence:	Possible
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	Reversible
Indirect impacts:	None
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Heavy construction traffic should not be allowed on the public road network during the typical a.m. and p.m. peak hours.
Residual impacts:	Low
Cumulative impact post mitigation:	Low

Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**3. Dust** The dust could be generated during the site preparation.
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term
Consequence of impact or risk:	Visual impacts Nuisance for residents adjacent to the site as well as road users.
Probability of occurrence:	Likely
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	High
Indirect impacts:	Potential for reduced visibility, temporary visual impacts to the general area.
Cumulative impact prior to mitigation:	Dust may be generated as a result of earthmoving machinery required for construction.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Maintain ground cover for as long as possible to reduce the total surface area exposed to wind. Do not clear entire plots and rather clear building sites only → Ensure vehicle speed limits on site are kept to a minimum. → Delivery vehicles to keep loads covered. → Cover fine material stockpiles. → Wet dry and dusty surfaces using non-potable water. → Staff to wear correct PPE if dust is generated for long periods. → Road surfaces to be swept and kept clean of sand and fine materials.
Residual impacts:	None
Cumulative impact post mitigation:	Dust generated during construction; mitigation successful
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-Low Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**4. Noise**

	Noise generated from vehicles and machinery during the construction phase.
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term
Consequence of impact or risk:	Noise disturbance to transient receptors, i.e motorists, and pedestrians.
Probability of occurrence:	Likely
Degree to which the impact may cause irreplaceable loss of resources:	No resources will be impacted.
Degree to which the impact can be reversed:	High
Indirect impacts:	None
Cumulative impact prior to mitigation:	Noise generated from construction works
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low negative
Degree to which the impact can be avoided:	Low-Medium
Degree to which the impact can be managed:	Low-medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Limit noise levels (e.g. install and maintain silencers on machinery). → Provide protective wear for workers i.e. ear plugs. → Ensure that construction vehicles and machinery are maintained regularly to reduce noise generation. → Restrict construction to normal working hours
Residual impacts:	None
Cumulative impact post mitigation:	Typical noise impacts associated with a construction site
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-Low Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**5. Visual impacts** Visual Impact may be expected – resulting directly from site clearance, bulk earthworks and removal of existing vegetation; with construction vehicles / building activity causing noise / dust.
Nature of impact:	Negative (visual disturbance to status quo), foreground construction activity.
Extent and duration of impact:	Local: Mid-term
Consequence of impact or risk:	Visual disturbance of status quo, foreground construction activity
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium-High – Where visual and scenic resources are affected to a limited extent only.
Degree to which the impact can be reversed:	Medium

Indirect impacts:	Increased activities associated with construction (later in time, elsewhere in space)
Cumulative impact prior to mitigation:	Development activity on adjacent properties.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High - Very High (-)
Degree to which the impact can be avoided:	Low-Medium
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low- Medium
Proposed mitigation:	→ Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced. → Addition it is recommended that the landscape and visual indicator are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines on page 52 of the Visual Impact Assessment must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact. → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas. → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views. → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow. → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a “solid” wall architecture (fig. 61). All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property.

	→ The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".	
Residual impacts:	Change in sense of place of the coastal landscape	
Cumulative impact post mitigation:	Change in character of the coastal cultural landscape (context)	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (-)	High (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:	**6. Paleontological Heritage** Loss of fossil bones and archaeological material from excavations in the coversands and beach deposits.	
Nature of impact:	Positive	
Extent and duration of impact:	Local; Regional and National: Permanent	
Consequence of impact or risk:	Loss of material palaeontological heritage.	
Probability of occurrence:	Possible	
Degree to which the impact may cause irreplaceable loss of resources:	Significant Loss may still occur.	
Degree to which the impact can be reversed:	Irreversible	
Indirect impacts:	Enriched landscape geohistory.	
Cumulative impact prior to mitigation:	Some fossils are rescued for posterity and available for scientific study.	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – Medium Positive	
Degree to which the impact can be avoided:	Low. The locations of fossil bones in the deposits cannot be predicted.	
Degree to which the impact can be managed:	Low. There is a high risk of valuable fossils being lost despite management actions to mitigate such loss.	
Degree to which the impact can be mitigated:	Moderate	
Proposed mitigation:	→ For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. → It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the proposed development. → The Fossil Finds Procedure provides guidelines to be followed in the event of fossil bone finds in the excavations. The works supervisor/foreman and workers	

	involved in excavating the building foundations, infrastructure trenches and stormwater drainage must be informed of the need to watch for fossils and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find. → If a significant occurrence of fossil bones in a palaeontological context is discovered a professional palaeontologist must be appointed to collect them and to record their contexts. Said palaeontologist must also undertake the recording of the stratigraphic context and sedimentary geometry of the exposure, the sampling of ambient small fossil content and the compilation of the report for distribution to Heritage Western Cape, SAHRA, the approved curatorial institution and local heritage interest groups. → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.	
Residual impacts:	Permanent loss of fossils and the associated scientific implications	
Cumulative impact post mitigation:	Positive – Discovery of new fossil evidence	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (+)	Medium (+)

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**7. Archaeological Impact** Buried shell middens, and unmarked Khoisan remains may be uncovered or intercepted during excavations for building foundations.
Nature of impact:	Negative
Extent and duration of impact:	Local: short-term
Consequence of impact or risk:	Excavations for building foundations and services may uncover buried archaeological deposits.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	High
Indirect impacts:	Archaeological resources being discovered.
Cumulative impact prior to mitigation:	Archaeological resources being discovered.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ No archaeological mitigation is needed prior to construction excavations commencing. → Archaeological monitoring of building foundations a services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist. → The above recommendations must be incorporated into the Environmental Management Plan (EMP) for the proposed development.
Residual impacts:	Potential discovery of Archaeological sites.
Cumulative impact post mitigation:	Potential discovery of Archaeological sites.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very Low (-)

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**8. Heritage Impact** *Palaeontology* The possible presence of fossils in the subsurface does not have an a priori influence on the decision to proceed with the proposed development. *Archaeology* Buried shell middens, and unmarked Khoisan remains may be uncovered or intercepted during excavations for building foundations and services but the probability of this occurring, is considered to be Low. *Visual Impacts* The development is proposed to occupy a portion of the coastline which is pristine and with no adjacent development to form a continuous pattern.
Nature of impact:	*Palaeontology* – Positive *Archaeology* – Negative *Visual* – Negative
Extent and duration of impact:	Local; Permanent
Consequence of impact or risk:	*Palaeontology* – Loss of material palaeontological heritage. *Archaeology* - The proposed development on the property will likely impact the on important Stone Age archaeological resources. *Visual/Heritage Resources* - Impact on visual heritage due to development in a pristine, undeveloped coastal area.
Probability of occurrence:	*Palaeontology* – Likely *Archaeology* – Unlikely *Visual/ Heritage Resource* – Likely
Degree to which the impact may cause irreplaceable loss of resources:	*Palaeontology* – Significant loss may still occur. *Archaeology* – Buried shell middens, and unmarked Khoisan remains may be uncovered or intercepted during excavations for building foundations and services but the probability of this occurring, is considered to be Low. *Visual/ Heritage Resources* - Irreplaceable loss of pristine, undeveloped coastal aesthetic due to development.
Degree to which the impact can be reversed:	***Palaeontology*** – Irreversible ***Archaeology*** – Reversible, provided excavation protocols are followed and materials are conserved appropriately. ***Visual/ Heritage*** – Irreversible, as once the development occurs, the pristine coastline cannot be restored.

Indirect impacts:	***Palaeontology*** – Enriched landscape geo-history ***Archaeology*** – Indications are that a proposed housing development on re Farm 218 – RE (seafront) does not pose a significant threat to local Stone Age archaeological resources. ***Visual*** – Loss of coastal aesthetic affects community access to a natural setting, which may lead to social impacts on visitors and residents.
Cumulative impact prior to mitigation:	***Palaeontology*** - Permanent loss of fossils and the associated scientific implications. ***Archaeology*** – Indications are that a proposed housing development on re Farm 218 – Re (seafront) does not pose a significant threat to local Stone Age archaeological resources. ***Visual/ Heritage*** – Cumulative impacts on visual intrusion due to loss of pristine, undeveloped coastal aesthetics.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	***Palaeontology*** – Low ***Archaeology*** – Low ***Visual*** – Medium
Degree to which the impact can be avoided:	***Palaeontology*** – Low. The locations of fossil bones in the deposits cannot be predicted. ***Archaeology*** – Low. The probability of uncovering significant archaeological remains is low. ***Visual*** – Low. The impact on visual heritage cannot be entirely avoided due to the coastal location of the development.
Degree to which the impact can be managed:	***Palaeontology*** – Low. There is a high risk of valuable fossils being lost despite management actions to mitigate such loss. ***Archaeology*** – Low. The development does not pose a significant threat to local Stone Age archaeological resources, but monitoring during construction is necessary. ***Visual*** – Moderate. Management through landscaping, architectural guidelines, and adherence to visual planning can reduce visual intrusion.
Degree to which the impact can be mitigated:	***Palaeontology*** – Moderate. Mitigation efforts can reduce the likelihood of irreversible loss of fossils, but the impact cannot be fully mitigated. ***Archaeology*** – Low. No significant mitigation is required, but archaeological monitoring is recommended during construction. ***Visual*** – Moderate. Effective design and planning (including appropriate landscaping, visual screening, and construction controls) can reduce visual impacts.
Proposed mitigation:	***Palaeontology*** → For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP) (Appendix 2), is

	included in the Environmental Management Plan (EMP) for the proposed development. → The field supervisor/foreman and workers involved in excavations must be informed of the need to watch for fossil bones and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby archaeologist or palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find. → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense ***Archaeology*** → No archaeological mitigation is needed prior to construction excavations commencing. → Archaeological monitoring of building foundations and services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist. → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist. ***Visual*** → Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced. → Addition it is recommended that the landscape and visual indicator are implemented and these parameters are incorporated in the planning application to ensure any

	new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines on page 52 of the Visual Impact Assessment must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact. → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas. → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views. → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow. → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a "solid" wall architecture (fig. 61). All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property. → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".
Residual impacts:	*Palaeontology* – Positive, as the development could lead to the discovery of new fossil records. *Archaeology* – No significant residual impacts, as the archaeological resources are not significantly threatened by the development. *Visual* – Ongoing visual impact on the coastal landscape due to the development but mitigated by design.
Cumulative impact post mitigation:	*Palaeontology* – Potential discovery of new fossil records. *Archaeology* – No significant cumulative impact, as mitigation measures ensure the conservation of archaeological resources.

		Visual – Cumulative impacts on visual aesthetics but mitigated through the careful planning and implementation of design guidelines.	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	***Palaeontology***	Low (+)	Medium (+)
	Archaeology	Low (-)	
	Visual	Medium (-)	High (-)
	Overall Heritage	High (-)	
PLANNING, DESIGN AND DEVELOPMENT PHASE			
Potential impact and risk:		**9. Botanical/ Terrestrial Biodiversity impacts** Impact on botanical and biodiversity aspects of the site contributing to loss of vegetation on site.	
Nature of impact:		Negative: Loss of natural vegetation i.e. Southwestern Strandveld	
Extent and duration of impact:		Local; Long-term	
Consequence of impact or risk:		Loss of Southwestern Strandveld	
Probability of occurrence:		Probable	
Degree to which the impact may cause irreplaceable loss of resources:		Low	
Degree to which the impact can be reversed:		Irreversible	
Indirect impacts:		None	
Cumulative impact prior to mitigation:		Contribution to loss of Southwestern Strandveld	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		High negative	
Degree to which the impact can be avoided:		Very Low	
Degree to which the impact can be managed:		Low	
Degree to which the impact can be mitigated:		Low	
Proposed mitigation:		On-site mitigation would not be possible since virtually the entire site would be developed.	
Residual impacts:		High negative	

Cumulative impact post mitigation:	Low negative
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**10. Coastal environment** The proposed development may result in disturbance to the coastal environment, impacting the delicate coastal ecosystem, including marine habitats, and adjacent shoreline areas.
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term
Consequence of impact or risk:	Medium: The consequences include potential degradation of coastal habitats, disruption to coastal ecosystems, disturbance to flora and fauna, and possible loss of beach area due to coastal erosion. These consequences may result in loss of biodiversity and the aesthetic value of the area.
Probability of occurrence:	Medium- High: Given the proximity of the site to sensitive coastal areas and the nature of the proposed development, there is a high probability of impact.
Degree to which the impact may cause irreplaceable loss of resources:	Medium-High
Degree to which the impact can be reversed:	Medium
Indirect impacts:	Potential pollution and increased human activity may impact the coastal environment including marine life.
Cumulative impact prior to mitigation:	High: habitat disturbance, increased foot traffic, pollution, and additional stress on coastal ecosystems.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High: Effective management practices, such as coastal setback regulations, pollution control, and erosion prevention measures, can greatly reduce the negative impact on the coastal environment.
Degree to which the impact can be mitigated:	Medium-High
Proposed mitigation:	→ Avoidance of sensitive coastal areas, such as high-water mark, coastal risk areas and critical habitats. → Establishment of restricted zones for public access and careful planning of the public footpath to minimize disturbance. → Regular monitoring of the coastal environment for signs of habitat degradation, pollution, and erosion.
Residual impacts:	Even after mitigation, some residual impacts may remain, particularly in terms of slight disturbances to the coastal

	environment during construction and possible slow recovery of ecosystems.
Cumulative impact post mitigation:	Low- Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**1. Socioeconomic impacts** The post-construction phase of the development is expected to have several socioeconomic impacts, including the creation of job opportunities, stimulation of local businesses, and potential changes in property values and community dynamics. The presence of a new development can affect local employment, access to services, and the cost of living for both current and new residents.
Nature of impact:	Positive
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	The consequences could include positive effects, such as economic growth, increased property values, and improved infrastructure.
Probability of occurrence:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	Changes in the local labour market, with increased demand for both skilled and unskilled workers, potentially raising wage levels but also increasing the cost of living.
Cumulative impact prior to mitigation:	Job creation and improved infrastructure for the local community.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High Positive
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Engagement with local stakeholders to understand their needs and ensure the development benefits the local community. → Provision of affordable housing and support for local businesses to prevent displacement and encourage inclusive economic growth.
Residual impacts:	Residual impacts may include ongoing changes to the local economy, such as higher property values and increased demand for goods and services, which could lead to higher living costs.

Cumulative impact post mitigation:	Job creation and improved infrastructure will provide long-term benefits to the local community.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (+)
POST-CONSTRUCTION	
Potential impact and risk:	**6. Transport impact** Traffic delay and congestion at intersections and road networks during the operational phase.
Nature of impact:	Negative
Extent and duration of impact:	Local, short-term
Consequence of impact or risk:	Very low
Probability of occurrence:	Possible
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	Reversible
Indirect impacts:	None
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Routine road maintenance by the Roads Authority.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**2. Botanical/ Terrestrial Biodiversity impacts** Limited further loss of plant species found in Overberg Dune Strandveld associated with the operational phase
Nature of impact:	No further impact after completion of construction
Extent and duration of impact:	Local; long- term.
Consequence of impact or risk:	The degradation or destruction of remaining indigenous vegetation may lead to a loss of biodiversity, disruption of ecological functions, and reduced aesthetic and recreational value.
Probability of occurrence:	Medium. There is a reasonable likelihood that post-construction activities or passive impacts (e.g., invasive

	species, human activity) could affect the indigenous vegetation if left unmanaged.
Degree to which the impact may cause irreplaceable loss of resources:	Medium-High While some indigenous vegetation may be restored, the loss of specific species or ecological functions may be irreversible if not actively managed or protected.
Degree to which the impact can be reversed:	Medium
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Medium-High
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	N/A
Residual impacts:	Medium
Cumulative impact post mitigation:	Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**3. Visual impacts** Contemporary layer added to the cultural landscape. Change in character of the coastal cultural landscape.
Nature of impact:	Negative: Intrusion of buildings in the foreground of a sensitive coastal landscape. Disturbance of an intact coastal landscape.
Extent and duration of impact:	Local; Long term
Consequence of impact or risk:	→ Alteration of the natural coastal aesthetic. → Potential visual intrusion for surrounding properties and public areas. → Loss of the original character and sense of place for the area.
Probability of occurrence:	High
Degree to which the impact may cause irreplaceable loss of resources:	Medium- High: The visual quality of the natural environment is altered, but no irreplaceable physical resources are directly impacted.
Degree to which the impact can be reversed:	Low: Mitigation measures such as landscaping, architectural design, and strategic placement of buildings and infrastructure can reduce visual impacts but cannot fully restore the original coastal landscape.

Indirect impacts:	Altered community perception of the area's character and desirability.
Cumulative impact prior to mitigation:	Medium-High: Combined with other developments in the area, the cumulative effect could significantly alter the visual character of the broader coastal region.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High
Degree to which the impact can be avoided:	Medium- High: Avoidance is possible through careful planning and design, such as limiting development to less visually intrusive areas.
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	→ Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced. → Addition it is recommended that the landscape and visual indicator are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines on page 52 of the Visual Impact Assessment must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact. → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas. → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views. → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow. → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a "solid" wall architecture (fig. 61). All boundary walls must be permeable to allow vegetation

	and greenery to continue through the fencing. There should be no fencing along the sea edge of the property. → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".	
Residual impacts:	Some alteration of the visual landscape will remain, but it can be minimized with effective mitigation. Reduced impact on the sense of place compared to unmitigated scenarios.	
Cumulative impact post mitigation:	There will be some cumulative impact but should mitigation measures be applied this will in time be minimised - Low to Very-low negative.	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (-)	High (-)
POST-CONSTRUCTION PHASE		
Potential impact and risk:	**4. Coastal environment** Alteration of the coastal landscape and potential degradation of coastal habitats due to increased human activity, infrastructure maintenance, and waste generation.	
Nature of impact:	Negative	
Extent and duration of impact:	Local; long-term	
Consequence of impact or risk:	Potential alteration of coastal character and ecological function due to human presence and ongoing maintenance activities, which may affect vegetation stability, visual quality, and biodiversity integrity.	
Probability of occurrence:	Moderate to high, depending on the level of ongoing management and adherence to mitigation measures.	
Degree to which the impact may cause irreplaceable loss of resources:	Medium	
Degree to which the impact can be reversed:	Moderate; some impacts, such as vegetation loss, can be reversed with active restoration, but others, such as habitat degradation, may require significant effort or remain irreversible.	
Indirect impacts:	Changes to the aesthetic and recreational value of the coastline.	
Cumulative impact prior to mitigation:	High: The coastal environmental may already be under pressure from other developments and stormwater outlets.	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High	

Degree to which the impact can be avoided:	Moderate; impacts can be minimized through careful planning and adherence to coastal management guidelines.	
Degree to which the impact can be managed:	High	
Degree to which the impact can be mitigated:	High	
Proposed mitigation:	→ Establish buffer zones to protect sensitive coastal areas. → Implement long-term monitoring of coastal processes and habitats. → Restrict access to ecologically sensitive areas using signage or fencing. → Restore disturbed vegetation with indigenous coastal plant species. → Regularly remove waste and debris from the site to prevent pollution.	
Residual impacts:	Minor disturbance to natural processes due to human presence and infrastructure maintenance. Reduced habitat quality in some areas if restoration is not fully effective.	
Cumulative impact post mitigation:	Low- Medium	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (-)	High (-)
DECOMMISSIONING AND CLOSURE PHASE		
Potential impact and risk:	N/A	
Nature of impact:	-	
Extent and duration of impact:	-	
Consequence of impact or risk:	-	
Probability of occurrence:	-	
Degree to which the impact may cause irreplaceable loss of resources:	-	
Degree to which the impact can be reversed:	-	
Indirect impacts:	-	
Cumulative impact prior to mitigation:	-	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-	
Degree to which the impact can be avoided:	-	
Degree to which the impact can be managed:	-	
Degree to which the impact can be mitigated:	-	
Proposed mitigation:	-	
Residual impacts:	-	
Cumulative impact post mitigation:	-	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-	

ALTERNATIVE 4

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**1. Socioeconomic impacts** Job creation (+)
Nature of impact:	Job creation; Positive
Extent and duration of impact:	Local; short-term (construction phase)
Consequence of impact or risk:	**Job Creation**: Positive consequences as it brings economic benefits to local residents, reducing unemployment rates temporarily.
Probability of occurrence:	Job creation: Definite
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Low
Indirect impacts:	Impact on public roads users
Cumulative impact prior to mitigation:	Cumulative impacts on roads and public users
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (+)
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Prioritize local hiring to maximize job creation for the community. → Ensure construction vehicles are adequately maintained, with proper scheduling and designated routes to minimize disruptions. → Ensure loads are securely fastened to prevent accidents or loss during transportation, which could impact public roads and road users.
Residual impacts:	**Job Creation**: Continued employment during the construction phase, contributing positively to the local economy.
Cumulative impact post mitigation:	**Job Creation**: Positive long-term economic benefits due to employment during construction.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High positive**

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**2. Transport impact** Traffic delay and congestion at intersections and road networks during the construction phase.
Nature of impact:	Negative
Extent and duration of impact:	Local, short-term
Consequence of impact or risk:	Very low:
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	None
Degree to which the impact can be reversed:	Reversible
Indirect impacts:	None
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Heavy construction traffic should not be allowed on the public road network during the typical a.m. and p.m. peak hours.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**3. Dust** Dust will be generated during the site preparation.
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term
Consequence of impact or risk:	Visual impacts

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

Degree to which the impact can be reversed:	High
Indirect impacts:	None
Cumulative impact prior to mitigation:	Noise generated from construction works
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low negative
Degree to which the impact can be avoided:	Low-Medium
Degree to which the impact can be managed:	Low-medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Limit noise levels (e.g. install and maintain silencers on machinery). → Provide protective wear for workers i.e. ear plugs. → Ensure that construction vehicles and machinery are maintained regularly to reduce noise generation. → Restrict construction to normal working hours
Residual impacts:	None
Cumulative impact post mitigation:	Typical noise impacts associated with a construction site
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**5. Visual impacts** Intrusion of buildings in the foreground of a sensitive coastal landscape. Disturbance of an intact coastal landscape. • Contemporary layer added to the cultural landscape. Change in character of the coastal cultural landscape (context). • Visual intrusion of new buildings. • Change in sense of place of the coastal landscape. Insertion of new buildings.
Nature of impact:	Negative (visual disturbance to status quo), foreground construction activity.
Extent and duration of impact:	Local: permanent
Consequence of impact or risk:	Visual disturbance of status quo, foreground construction activity
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium-High – Where visual and scenic resources are affected to a limited extent only.
Degree to which the impact can be reversed:	Medium
Indirect impacts:	Increased activities associated with construction (later in time, elsewhere in space)
Cumulative impact prior to mitigation:	Development activity on adjacent properties.

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High - Very High (-)
Degree to which the impact can be avoided:	Low-Medium
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low- Medium
Proposed mitigation:	→ Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced. → Addition it is recommended that the landscape and visual indicator are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines on page 52 of the Visual Impact Assessment must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact. → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas. → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views. → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow. → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a “solid” wall architecture (fig. 61). All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property. → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render

	supplied. Where possible the roofs must be vegetated "green roofs".	
Residual impacts:	Change in sense of place of the coastal landscape	
Cumulative impact post mitigation:	Change in character of the coastal cultural landscape (context)	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (-)	High (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:	**6. Paleontological Heritage** Loss of fossil bones and archaeological material from excavations in the coversands and beach deposits.	
Nature of impact:	Positive	
Extent and duration of impact:	Local; Regional and National: Permanent	
Consequence of impact or risk:	Loss of material palaeontological heritage.	
Probability of occurrence:	Possible	
Degree to which the impact may cause irreplaceable loss of resources:	Significant Loss may still occur.	
Degree to which the impact can be reversed:	Irreversible	
Indirect impacts:	Enriched landscape geohistory.	
Cumulative impact prior to mitigation:	Some fossils are rescued for posterity and available for scientific study.	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – Medium Positive	
Degree to which the impact can be avoided:	Low. The locations of fossil bones in the deposits cannot be predicted.	
Degree to which the impact can be managed:	Low. There is a high risk of valuable fossils being lost despite management actions to mitigate such loss.	
Degree to which the impact can be mitigated:	Moderate	
Proposed mitigation:	→ For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. → It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the proposed development. → The Fossil Finds Procedure provides guidelines to be followed in the event of fossil bone finds in the excavations. The works supervisor/foreman and workers involved in excavating the building foundations, infrastructure trenches and stormwater drainage must be informed of the need to watch for fossils and archaeological material. Workers seeing potential	

	objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find. → If a significant occurrence of fossil bones in a palaeontological context is discovered a professional palaeontologist must be appointed to collect them and to record their contexts. Said palaeontologist must also undertake the recording of the stratigraphic context and sedimentary geometry of the exposure, the sampling of ambient small fossil content and the compilation of the report for distribution to Heritage Western Cape, SAHRA, the approved curatorial institution and local heritage interest groups. → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.	
Residual impacts:	Permanent loss of fossils and the associated scientific implications	
Cumulative impact post mitigation:	Positive – Discovery of new fossil evidence	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (+)	Medium (+)
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:	**7. Archaeological Impact** Buried shell middens, and unmarked Khoisan remains may be uncovered or intercepted during excavations for building foundations.	
Nature of impact:	Negative	
Extent and duration of impact:	Local: short-term	

Consequence of impact or risk:	Excavations for building foundations and services may uncover buried archaeological deposits.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	High
Indirect impacts:	Archaeological resources being discovered.
Cumulative impact prior to mitigation:	Archaeological resources being discovered.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ No archaeological mitigation is needed prior to construction excavations commencing. → Archaeological monitoring of building foundations a services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist. → The above recommendations must be incorporated into the Environmental Management Plan (EMP) for the proposed development.
Residual impacts:	Potential discovery of Archaeological sites.
Cumulative impact post mitigation:	Potential discovery of Archaeological sites.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**8. Heritage Impact** Impact on integrated heritage related aspects of the site (palaeontological, archaeological, botanical, visual) due to site clearance, removal of existing vegetation, earthworks, site establishment.
Nature of impact:	Negative; Change in sense of place, temporary loss of access
Extent and duration of impact:	Local; short-term
Consequence of impact or risk:	visual and physical disturbance of status quo, foreground construction activity
Probability of occurrence:	Definite

Degree to which the impact may cause irreplaceable loss of resources:	Medium – High
Degree to which the impact can be reversed:	Medium – Low
Indirect impacts:	Not identified
Cumulative impact prior to mitigation:	Activities associated with construction
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High
Degree to which the impact can be avoided:	Low – Medium
Degree to which the impact can be managed:	Low – Medium
Degree to which the impact can be mitigated:	Low – Medium
Proposed mitigation:	***Palaeontology*** → For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP) is included in the Environmental Management Plan (EMP) for the proposed development. → The field supervisor/foreman and workers involved in excavations must be informed of the need to watch for fossil bones and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby archaeologist or palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find. → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense ***Archaeology*** → No archaeological mitigation is needed prior to construction excavations commencing.

	→ Archaeological monitoring of building foundations and services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist. → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist. ***Visual*** → Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced. → In addition it is recommended that the landscape and visual indicator are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines on page 52 of the Visual Impact Assessment must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact. → This includes any new additions and alterations, an architectural and landscape design review commitee must assess each application and amendment individually and no building works or landscape works take place without prior approval. → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas. → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views. → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow. → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a

	cumulative effect of a "solid" wall architecture (fig. 61). All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property. → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".
Residual impacts:	Time for rehabilitation
Cumulative impact post mitigation:	Low/ neutral
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**9. Botanical** Impact on botanical and biodiversity aspects of the site.
Nature of impact:	Negative: Loss of natural vegetation i.e. Southwestern Strandveld
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	Loss of Southwestern Strandveld
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	None
Cumulative impact prior to mitigation:	Contribution to loss of Southwestern Strandveld
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium negative
Degree to which the impact can be avoided:	Very Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	Since the western end of the site supporting Agulhas Limestone Fynbos would remain intact, Alternative 4 mitigates the effect of both Alternative 2 and Alternative 3 since the western end of the site would not be developed.

Residual impacts:	Medium negative
Cumulative impact post mitigation:	Low negative
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**10. Coastal environment** The proposed development may result in disturbance to the coastal environment, impacting the delicate coastal ecosystem, including marine habitats, and adjacent shoreline areas.
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term
Consequence of impact or risk:	Low-Medium: The consequences include potential degradation of coastal habitats, disruption to coastal ecosystems, disturbance to flora and fauna, and possible loss of beach area due to coastal erosion. These consequences may result in loss of biodiversity and the aesthetic value of the area.
Probability of occurrence:	Medium- High: Given the proximity of the site to sensitive coastal areas and the nature of the proposed development, there is a high probability of impact.
Degree to which the impact may cause irreplaceable loss of resources:	Medium-High
Degree to which the impact can be reversed:	Medium
Indirect impacts:	Potential pollution and increased human activity may impact the coastal environment including marine life.
Cumulative impact prior to mitigation:	High: habitat disturbance, increased foot traffic, pollution, and additional stress on coastal ecosystems.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High: Effective management practices, such as coastal setback regulations, pollution control, and erosion prevention measures, can greatly reduce the negative impact on the coastal environment.
Degree to which the impact can be mitigated:	Medium-High
Proposed mitigation:	→ Avoidance of sensitive coastal areas, such as high-water mark, coastal risk areas and critical habitats. → Establishment of restricted zones for public access and careful planning of the public footpath to minimize disturbance.

	→ Regular monitoring of the coastal environment for signs of habitat degradation, pollution, and erosion.	
Residual impacts:	Even after mitigation, some residual impacts may remain, particularly in terms of slight disturbances to the coastal environment during construction and possible slow recovery of ecosystems.	
Cumulative impact post mitigation:	Low- Medium	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)	Medium (-)
POST-CONSTRUCTION PHASE		
Potential impact and risk:	**1. Socioeconomic impacts** The post-construction phase of the development is expected to have several positive socioeconomic impacts, including the creation of job opportunities, stimulation of local businesses, and potential changes in property values and community dynamics. The presence of a new development can affect local employment, access to services, and the cost of living for both current and new residents.	
Nature of impact:	Positive	
Extent and duration of impact:	Local; Long-term	
Consequence of impact or risk:	The consequences could include positive effects, such as economic growth, increased property values, and improved infrastructure.	
Probability of occurrence:	High	
Degree to which the impact may cause irreplaceable loss of resources:	Low	
Degree to which the impact can be reversed:	Irreversible	
Indirect impacts:	Changes in the local labour market, with increased demand for both skilled and unskilled workers, potentially raising wage levels but also increasing the cost of living.	
Cumulative impact prior to mitigation:	Job creation and improved infrastructure for the local community.	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High Positive	
Degree to which the impact can be avoided:	Medium	
Degree to which the impact can be managed:	High	
Degree to which the impact can be mitigated:	Medium	
Proposed mitigation:	→ Engagement with local stakeholders to understand their needs and ensure the development benefits the local community.	

	→ Provision of affordable housing and support for local businesses to prevent displacement and encourage inclusive economic growth
Residual impacts:	Residual impacts may include ongoing changes to the local economy, such as higher property values and increased demand for goods and services, which could lead to higher living costs.
Cumulative impact post mitigation:	Job creation and improved infrastructure will provide long-term benefits to the local community.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (+)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**2. Transport impact** Increase in traffic volumes due to background traffic growth.
Nature of impact:	Neutral
Extent and duration of impact:	Regional, medium to long-term
Consequence of impact or risk:	Very low:
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	None
Degree to which the impact can be reversed:	Reversible
Indirect impacts:	None
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Routine road maintenance by the Roads Authority.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**3. Botanical/ Terrestrial Biodiversity impacts** The post-construction phase may result in the disturbance or destruction of remaining indigenous vegetation, especially

	due to ongoing human activity, site management, or potential degradation through invasive species.
Nature of impact:	No further impact after completion of construction
Extent and duration of impact:	Eastern portion of the site; long-term
Consequence of impact or risk:	The degradation or destruction of remaining indigenous vegetation may lead to a loss of biodiversity, disruption of ecological functions, and reduced aesthetic and recreational value.
Probability of occurrence:	Medium. There is a reasonable likelihood that post-construction activities or passive impacts (e.g., invasive species, human activity) could affect the indigenous vegetation if left unmanaged.
Degree to which the impact may cause irreplaceable loss of resources:	Medium-High While some indigenous vegetation may be restored, the loss of specific species or ecological functions may be irreversible if not actively managed or protected.
Degree to which the impact can be reversed:	Medium
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Medium-High
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	N/A
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**4. Visual impacts** → Transformation of the site from a coastal landscape to residential (change in 'sense of place') o Change in character of the coastal cultural landscape o Visual intrusion of new buildings o Change in sense of place of the coastal landscape.
Nature of impact:	Negative: Intrusion of buildings in the foreground of a sensitive coastal landscape. Disturbance of an intact coastal landscape.
Extent and duration of impact:	Local; Long term

Consequence of impact or risk:	→ Alteration of the natural coastal aesthetic. → Potential visual intrusion for surrounding properties and public areas. → Loss of the original character and sense of place for the area.
Probability of occurrence:	**High**
Degree to which the impact may cause irreplaceable loss of resources:	**Medium- High**: The visual quality of the natural environment is altered, but no irreplaceable physical resources are directly impacted.
Degree to which the impact can be reversed:	**Low**: Mitigation measures such as landscaping, architectural design, and strategic placement of buildings and infrastructure can reduce visual impacts but cannot fully restore the original coastal landscape.
Indirect impacts:	Altered community perception of the area's character and desirability.
Cumulative impact prior to mitigation:	**Medium-High:** Combined with other developments in the area, the cumulative effect could significantly alter the visual character of the broader coastal region.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High
Degree to which the impact can be avoided:	**Medium- High:** Avoidance is possible through careful planning and design, such as limiting development to less visually intrusive areas.
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	→ Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced. → Addition it is recommended that the landscape and visual indicator are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines on page 52 of the Visual Impact Assessment must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact. → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas.

	→ Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views. → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow. → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a "solid" wall architecture (fig. 61). All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property. → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".
Residual impacts:	Some alteration of the visual landscape will remain, but it can be minimized with effective mitigation. Reduced impact on the sense of place compared to unmitigated scenarios.
Cumulative impact post mitigation:	There will be some cumulative impact but should mitigation measures be applied this will in time be minimised - Low to Very-low negative.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**5. Coastal environment** Alteration of the coastal landscape and potential degradation of coastal habitats due to increased human activity, infrastructure maintenance, and waste generation.
Nature of impact:	Negative
Extent and duration of impact:	Local; long-term
Consequence of impact or risk:	Potential alteration of coastal character and ecological function due to human presence and ongoing maintenance

	activities, which may affect vegetation stability, visual quality, and biodiversity integrity.
Probability of occurrence:	Moderate to high, depending on the level of ongoing management and adherence to mitigation measures.
Degree to which the impact may cause irreplaceable loss of resources:	Medium
Degree to which the impact can be reversed:	Moderate; some impacts, such as vegetation loss, can be reversed with active restoration, but others, such as habitat degradation, may require significant effort or remain irreversible.
Indirect impacts:	Changes to the aesthetic and recreational value of the coastline.
Cumulative impact prior to mitigation:	High: The coastal environmental may already be under pressure from other developments and stormwater outlets.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High
Degree to which the impact can be avoided:	Moderate; impacts can be minimized through careful planning and adherence to coastal management guidelines.
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Establish buffer zones to protect sensitive coastal areas. → Implement long-term monitoring of coastal processes and habitats. → Restrict access to ecologically sensitive areas using signage or fencing. → Restore disturbed vegetation with indigenous coastal plant species. → Regularly remove waste and debris from the site to prevent pollution.
Residual impacts:	Minor disturbance to natural processes due to human presence and infrastructure maintenance. Reduced habitat quality in some areas if restoration is not fully effective.
Cumulative impact post mitigation:	Low- Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**6. Heritage Impacts** Impact on integrated heritage related aspects (palaeontological, archaeological, botanical, visual)

Nature of impact:	Negative; Intrusion of buildings in the foreground of a sensitive coastal landscape. Disturbance of a intact coastal landscape; Change in sense of place, loss of access to coastal resources
Extent and duration of impact:	Local; Long – term
Consequence of impact or risk:	Change in character of the coastal cultural landscape
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium – High
Degree to which the impact can be reversed:	Low
Indirect impacts:	Not identified
Cumulative impact prior to mitigation:	Contribution to loss of coastal landscape and access
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	***Palaeontology*** → For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP) is included in the Environmental Management Plan (EMP) for the proposed development. → The field supervisor/foreman and workers involved in excavations must be informed of the need to watch for fossil bones and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby archaeologist or palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find. → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a

	SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense ***Archaeology*** → No archaeological mitigation is needed prior to construction excavations commencing. → Archaeological monitoring of building foundations and services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist. → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist. ***Visual*** → Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced. → In addition it is recommended that the landscape and visual indicator are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines on page 52 of the Visual Impact Assessment must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact. → This includes any new additions and alterations, an architectural and landscape design review commitee must assess each application and amendment individually and no building works or landscape works take place without prior approval. → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas. → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views.

	→ Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow. → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a "solid" wall architecture (fig. 61). All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property. → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".
Residual impacts:	Restrictions on access to coastal resources
Cumulative impact post mitigation:	Low – Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (-) / High (-)
DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	N/A
Nature of impact:	-
Extent and duration of impact:	-
Consequence of impact or risk:	-
Probability of occurrence:	-
Degree to which the impact may cause irreplaceable loss of resources:	-
Degree to which the impact can be reversed:	-
Indirect impacts:	-
Cumulative impact prior to mitigation:	-
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-
Degree to which the impact can be avoided:	-
Degree to which the impact can be managed:	-
Degree to which the impact can be mitigated:	-
Proposed mitigation:	-
Residual impacts:	-
Cumulative impact post mitigation:	-
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-

ALTERNATIVE 5 (PREFERRED)

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**1. Socioeconomic impacts** Job creation (+)
Nature of impact:	Job creation; Positive
Extent and duration of impact:	Local; short-term (construction phase)
Consequence of impact or risk:	**Job Creation**: Positive consequences as it brings economic benefits to local residents, reducing unemployment rates temporarily.
Probability of occurrence:	Job creation: Definite
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Low
Indirect impacts:	Impact on public roads users
Cumulative impact prior to mitigation:	Cumulative impacts on roads and public users
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (+)
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Prioritize local hiring to maximize job creation for the community. → Ensure construction vehicles are adequately maintained, with proper scheduling and designated routes to minimize disruptions. → Ensure loads are securely fastened to prevent accidents or loss during transportation, which could impact public roads and road users.
Residual impacts:	**Job Creation**: Continued employment during the construction phase, contributing positively to the local economy.
Cumulative impact post mitigation:	**Job Creation**: Positive long-term economic benefits due to employment during construction.

Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**High positive**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**2. Transport impact** Traffic delay and congestion at intersections and road networks during the construction phase.
Nature of impact:	Negative
Extent and duration of impact:	Local, short-term
Consequence of impact or risk:	Very low:
Probability of occurrence:	Possible
Degree to which the impact may cause irreplaceable loss of resources:	None
Degree to which the impact can be reversed:	Reversible
Indirect impacts:	None
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Heavy construction traffic should not be allowed on the public road network during the typical a.m. and p.m. peak hours.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**3. Dust** Dust will be generated during the site preparation.
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term

Consequence of impact or risk:	Visual impacts Nuisance for residents adjacent to the site as well as road users.
Probability of occurrence:	Likely
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	High
Indirect impacts:	Potential for reduced visibility, temporary visual impacts to the general area.
Cumulative impact prior to mitigation:	Dust may be generated as a result of earthmoving machinery required for construction.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Maintain ground cover for as long as possible to reduce the total surface area exposed to wind. Do not clear entire plots and rather clear building sites only → Ensure vehicle speed limits on site are kept to a minimum. → Delivery vehicles to keep loads covered. → Cover fine material stockpiles. → Wet dry and dusty surfaces using non-potable water. → Staff to wear correct PPE if dust is generated for long periods. → Road surfaces to be swept and kept clean of sand and fine materials.
Residual impacts:	None
Cumulative impact post mitigation:	Dust generated during construction; mitigation successful
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-Low Negative
Potential impact and risk:	**4. Noise** Noise generated from vehicles and machinery during the construction phase.
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term
Consequence of impact or risk:	Noise disturbance to transient receptors, i.e motorists, and pedestrians.
Probability of occurrence:	Likely

Degree to which the impact may cause irreplaceable loss of resources:	No resources will be impacted.
Degree to which the impact can be reversed:	High
Indirect impacts:	None
Cumulative impact prior to mitigation:	Noise generated from construction works
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low negative
Degree to which the impact can be avoided:	Low-Medium
Degree to which the impact can be managed:	Low-medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Limit noise levels (e.g. install and maintain silencers on machinery). → Provide protective wear for workers i.e. ear plugs. → Ensure that construction vehicles and machinery are maintained regularly to reduce noise generation. → Restrict construction to normal working hours in line with the municipal by-laws.
Residual impacts:	None
Cumulative impact post mitigation:	Typical noise impacts associated with a construction site
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-Low Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**5. Visual impacts** a) Site clearance, removal of existing vegetation, earthworks, site establishment. b) Change in character of the coastal cultural landscape (context) and Visual intrusion of new buildings. c) Change in sense of place of the coastal landscape
Nature of impact:	Negative (visual disturbance to status quo), foreground construction activity.
Extent and duration of impact:	Local: short/medium- term
Consequence of impact or risk:	Visual disturbance of status quo, foreground construction activity
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium-High
Degree to which the impact can be reversed:	Low
Indirect impacts:	Increased activities associated with construction (later in time, elsewhere in space)
Cumulative impact prior to mitigation:	Development activity on adjacent properties.

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High - Very High (-)
Degree to which the impact can be avoided:	Low-Medium
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low- Medium
Proposed mitigation:	→ Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced. → In addition it is recommended that the landscape and visual indicators are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines dated 12-09-2025 must be strictly adhered to to ensure long-term mitigation of the visual intrusion and impact. → This includes any new additions and alterations, an architectural and landscape design review commitee must assess each application and amendment individually and no building works or landscape works take place without prior approval. → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas. → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views. → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow. → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a “solid” wall architecture. All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property.

	→ The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".
Residual impacts:	This will be a local impact, but some residual impact will remain
Cumulative impact post mitigation:	There will be some cumulative impact but should mitigation measures be applied this will in time be minimised - Neutral to Low Negative
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**6. Paleontological Heritage** Loss of fossil bones and archaeological material from excavations in the coversands and beach deposits.
Nature of impact:	Positive
Extent and duration of impact:	Local; Regional and National: Permanent
Consequence of impact or risk:	Loss of material palaeontological heritage.
Probability of occurrence:	Possible
Degree to which the impact may cause irreplaceable loss of resources:	Significant Loss may still occur.
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	Enriched landscape geohistory.
Cumulative impact prior to mitigation:	Some fossils are rescued for posterity and available for scientific study.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – Medium Positive
Degree to which the impact can be avoided:	Low. The locations of fossil bones in the deposits cannot be predicted.
Degree to which the impact can be managed:	Low. There is a high risk of valuable fossils being lost despite management actions to mitigate such loss.
Degree to which the impact can be mitigated:	Moderate
Proposed mitigation:	→ For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. → It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the proposed development.

	→ The Fossil Finds Procedure provides guidelines to be followed in the event of fossil bone finds in the excavations. The works supervisor/foreman and workers involved in excavating the building foundations, infrastructure trenches and stormwater drainage must be informed of the need to watch for fossils and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find. → If a significant occurrence of fossil bones in a palaeontological context is discovered a professional palaeontologist must be appointed to collect them and to record their contexts. Said palaeontologist must also undertake the recording of the stratigraphic context and sedimentary geometry of the exposure, the sampling of ambient small fossil content and the compilation of the report for distribution to Heritage Western Cape, SAHRA, the approved curatorial institution and local heritage interest groups. → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.	
Residual impacts:	Permanent loss of fossils and the associated scientific implications	
Cumulative impact post mitigation:	Positive – Discovery of new fossil evidence	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (+)	Medium (+)

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**7. Archaeological Impact** Buried shell middens, and unmarked Khoisan remains may be uncovered or intercepted during excavations for building foundations.
Nature of impact:	Negative
Extent and duration of impact:	Local: short-term
Consequence of impact or risk:	Excavations for building foundations and services may uncover buried archaeological deposits.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	High
Indirect impacts:	Archaeological resources being uncovered.
Cumulative impact prior to mitigation:	Archaeological resources being uncovered.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ No archaeological mitigation is needed prior to construction excavations commencing. → Archaeological monitoring of building foundations a services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist.
Residual impacts:	Potential discovery of Archaeological sites.
Cumulative impact post mitigation:	Potential discovery of Archaeological sites.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**8. Heritage Impact** Impact on integrated heritage related aspects of the site (palaeontological, archaeological, botanical, visual) due to site clearance, removal of existing vegetation, earthworks, site establishment.

Nature of impact:	Negative; *Change in sense of place, temporary loss of access*
Extent and duration of impact:	Local; short-term
Consequence of impact or risk:	visual disturbance of status quo, foreground construction activity
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium – Medium -High
Degree to which the impact can be reversed:	Medium – Low
Indirect impacts:	Not identified
Cumulative impact prior to mitigation:	Activities associated with construction
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High, High
Degree to which the impact can be avoided:	Low – Medium
Degree to which the impact can be managed:	Low – Medium
Degree to which the impact can be mitigated:	Low – Medium
Proposed mitigation:	***Palaeontology*** → For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP) is included in the Environmental Management Plan (EMP) for the proposed development. → The field supervisor/foreman and workers involved in excavations must be informed of the need to watch for fossil bones and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby archaeologist or palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find. → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of

	discovered palaeontological remains by a contracted specialist shall be at the Developer's expense ***Archaeology*** → No archaeological mitigation is needed prior to construction excavations commencing. → Archaeological monitoring of building foundations and services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist. → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist. ***Visual*** → Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced. → In addition it is recommended that the landscape and visual indicators are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines dated 12-09-2025 must be strictly adhered to to ensure long-term mitigation of the visual intrusion and impact. → This includes any new additions and alterations, an architectural and landscape design review commitee must assess each application and amendment individually and no building works or landscape works take place without prior approval. → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas. → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views.

	→ Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow. → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a "solid" wall architecture. All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property. → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".
Residual impacts:	Time for rehabilitation
Cumulative impact post mitigation:	N/A
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**9. Botanical** Impact on botanical and biodiversity aspects of the site.
Nature of impact:	Negative: Loss of natural vegetation i.e. Southwestern Strandveld
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	Loss of Southwestern Strandveld
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	None
Cumulative impact prior to mitigation:	Contribution to loss of Southwestern Strandveld
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium negative
Degree to which the impact can be avoided:	Very Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low

Proposed mitigation:	Since the western end of the site supporting Agulhas Limestone Fynbos would remain intact, Alternative 5 mitigates the effect of both Alternative 2 and Alternative 3 since the western end of the site would not be developed.
Residual impacts:	Medium negative
Cumulative impact post mitigation:	Low negative
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**10. Coastal environment** The proposed development may result in disturbance to the coastal environment, impacting the delicate coastal ecosystem, including marine habitats, and adjacent shoreline areas.
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term
Consequence of impact or risk:	Low-Medium: The consequences include potential degradation of coastal habitats, disruption to coastal ecosystems, disturbance to flora and fauna, and possible loss of beach area due to coastal erosion. These consequences may result in loss of biodiversity and the aesthetic value of the area.
Probability of occurrence:	Medium- High: Given the proximity of the site to sensitive coastal areas and the nature of the proposed development, there is a high probability of impact.
Degree to which the impact may cause irreplaceable loss of resources:	Medium-High
Degree to which the impact can be reversed:	Medium
Indirect impacts:	Potential pollution and increased human activity may impact the coastal environment including marine life.
Cumulative impact prior to mitigation:	High: habitat disturbance, increased foot traffic, pollution, and additional stress on coastal ecosystems.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – Low
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High: Effective management practices, such as coastal setback regulations, repositioning the dwellings landward, pollution control, and erosion prevention measures, can greatly reduce the negative impact on the coastal environment.
Degree to which the impact can be mitigated:	Medium-High

Proposed mitigation:	→ Avoidance of sensitive coastal areas, such as high-water mark, coastal risk areas and critical habitats. → Establishment of restricted zones for public access and careful planning of the public footpath to minimize disturbance. → Regular monitoring of the coastal environment for signs of habitat degradation, pollution, and erosion.
Residual impacts:	Even after mitigation, some residual impacts may remain, particularly in terms of slight disturbances to the coastal environment during construction and possible slow recovery of ecosystems.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**11. Faunal impacts** Struisbaai supports extensive sandy and mixed rocky–sandy beaches that provide suitable breeding and foraging habitat for *Haematopus moquini* (African Black Oystercatcher). Regional monitoring and citizen science data confirm the regular occurrence of this species along the southern Cape coast, with known breeding territories in the broader region. However, the section of beach adjacent to RE/281 is narrow (~30 m at its widest, with <3 m outside of the tidal zone) and the rocky tidal areas are largely depauperate of suitable prey species. Furthermore, high levels of recreational beach use in the vicinity are likely to deter breeding. The immediate area adjacent to RE/281 is therefore not considered suitable as breeding habitat for *H. moquini*. The potential impact on this species is consequently assessed as low, with no expected loss of breeding habitat.
Nature of impact:	Negative
Extent and duration of impact:	Localised to the immediate coastal area adjacent to RE/281; short-term during construction.
Consequence of impact or risk:	Minor disturbance to foraging individuals; negligible long-term ecological consequence.
Probability of occurrence:	Low – given unsuitable breeding habitat and existing disturbance from beach users
Degree to which the impact may cause irreplaceable loss of resources:	Low – no breeding habitat or critical resources expected to be affected.
Degree to which the impact can be reversed:	High
Indirect impacts:	Temporary avoidance of foraging areas by shorebirds; minor displacement.
Cumulative impact prior to mitigation:	Low – cumulative disturbance levels similar to existing human activity in the area.

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Restrict all construction activities to daylight hours to minimise disturbance to nocturnal fauna. Limit vehicle and machinery movement to designated access routes and work areas to avoid unnecessary habitat disturbance. Store building materials on raised platforms or pallets to prevent their use as refuges by snakes and small mammals. No off-road driving should occur on beaches, dunes, or other sensitive habitats. → Enforce a no-harm policy for all wildlife encountered on-site, particularly reptiles. Any necessary relocation must be carried out by a suitably qualified and permitted handler. Prohibit domestic animals (e.g., dogs and cats) from entering the site during construction to reduce predation risk to native fauna. All site personnel should receive a brief induction on local fauna and the importance of species protection. → During the African Black Oystercatcher (*Haematopus moquini)* breeding season (October–March), survey the immediate project footprint and adjacent beaches for active nests. If nests are present, mark and maintain a minimum 50 m no-go buffer until chicks have fledged, in consultation with CapeNature. → Ensure all waste is stored in secure containers and regularly removed from the site to prevent attracting scavengers or predators. Avoid leaving food scraps or other organic waste exposed.
Residual impacts:	Negligible – temporary disturbance only, with no habitat loss or long-term displacement expected.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**12. Socioeconomic impacts** The post-construction phase of the development is expected to have several positive socioeconomic impacts, including the creation of job opportunities, stimulation of local businesses, and potential changes in property values and community dynamics. The presence of a new development

	can affect local employment, access to services, and the cost of living for both current and new residents.
Nature of impact:	Positive
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	The consequences could include positive effects, such as economic growth, increased property values, and improved infrastructure.
Probability of occurrence:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	Changes in the local labour market, with increased demand for both skilled and unskilled workers, potentially raising wage levels but also increasing the cost of living.
Cumulative impact prior to mitigation:	Job creation and improved infrastructure for the local community.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High Positive
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Investment in the area, attraction to the area. → Access to employment opportunities for the community during the operational phase, job creation, provision of housing in response to the provincial demand and investment in the area. → Engagement with local stakeholders to understand their needs and ensure the development benefits the local community. → Provision of affordable housing and support for local businesses to prevent displacement and encourage inclusive economic growth
Residual impacts:	Residual impacts may include ongoing changes to the local economy, such as higher property values and increased demand for goods and services, which could lead to higher living costs.
Cumulative impact post mitigation:	Job creation and improved infrastructure will provide long-term benefits to the local community.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (+)

POST-CONSTRUCTION PHASE (OPERATIONAL)	
Potential impact and risk:	**1. Transport impact** Traffic delay and congestion at intersections and road networks during the operational phase.
Nature of impact:	Negative
Extent and duration of impact:	Local, short-term
Consequence of impact or risk:	Very low:
Probability of occurrence:	Possible
Degree to which the impact may cause irreplaceable loss of resources:	None
Degree to which the impact can be reversed:	Reversible
Indirect impacts:	None
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Routine road maintenance by the Roads Authority.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very-low (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**2. Botanical/ Terrestrial Biodiversity impacts** Limited loss of plant species found in Overberg Dune Strandveld (Southwestern Strandveld).
Nature of impact:	No further impact after completion of construction
Extent and duration of impact:	Eastern portion of the site; long-term
Consequence of impact or risk:	Only the eastern part of the site would be impacted in the long-term. The western end would not be affected.
Probability of occurrence:	Probable – Low
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Medium
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	High

Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	The main mitigation is to ensure that the western end of the site that is the most sensitive remains undeveloped. Alternatives 2 and 3 would have the western end developed but Alternatives 4 and 5 (preferred) would avoid development there and so that is argued to be mitigation for the latter two alternatives.
Residual impacts:	Residual impacts are those impacts which remain after mitigation has been implemented. For Alternatives 2 and 3, the residual impacts would be Medium Negative, whereas for Alternatives 4 and 5 (the preferred alternative), the residual impact would be Low Negative since the development footprint would be smaller than for the other two alternatives. Since the residual impact for Alternative 5 (preferred) would be Low Negative, there is no requirement for a biodiversity offset.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**3. Visual impacts** a) Contemporary layer added to the cultural landscape b) Change in character of the coastal cultural landscape c) Visual intrusion of new buildings d) Change in sense of place of the coastal landscape.
Nature of impact:	Negative: Intrusion of buildings in the foreground of a sensitive coastal landscape. Disturbance of an intact coastal landscape.
Extent and duration of impact:	Local; Long term
Consequence of impact or risk:	→ Alteration of the natural coastal aesthetic. → Potential visual intrusion for surrounding properties and public areas. → Loss of the original character and sense of place for the area.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium- High
Degree to which the impact can be reversed:	Low
Indirect impacts:	Increased activities associated with construction
Cumulative impact prior to mitigation:	Development activity on adjacent properties

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – Medium
Degree to which the impact can be avoided:	Unavoidable
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	→ Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced. → In addition it is recommended that the landscape and visual indicators are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines dated 12-09-2025 must be strictly adhered to to ensure long-term mitigation of the visual intrusion and impact. → This includes any new additions and alterations, an architectural and landscape design review commitee must assess each application and amendment individually and no building works or landscape works take place without prior approval. → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas. → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views. → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow. → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a “solid” wall architecture. All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property.

	→ The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".
Residual impacts:	This will be a local impact, but some residual impact will remain
Cumulative impact post mitigation:	There will be some cumulative impact but should mitigation measures be applied this will in time be minimised - Neutral to Low Negative
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**4. Coastal environment** Alteration of the coastal landscape and potential degradation of coastal habitats due to increased human activity, infrastructure maintenance, and waste generation.
Nature of impact:	Negative
Extent and duration of impact:	Local; long-term
Consequence of impact or risk:	
Probability of occurrence:	Moderate to high, depending on the level of ongoing management and adherence to mitigation measures.
Degree to which the impact may cause irreplaceable loss of resources:	Medium
Degree to which the impact can be reversed:	Moderate; some impacts, such as vegetation loss, can be reversed with active restoration, but others, such as habitat degradation, may require significant effort or remain irreversible.
Indirect impacts:	Changes to the aesthetic and recreational value of the coastline.
Cumulative impact prior to mitigation:	High: The coastal environmental may already be under pressure from other developments and stormwater outlets.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High
Degree to which the impact can be avoided:	Moderate; impacts can be minimized through careful planning and adherence to coastal management guidelines.
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Establish buffer zones to protect sensitive coastal areas.

	→ Implement long-term monitoring of coastal processes and habitats. → Restrict access to ecologically sensitive areas using signage or fencing. → Restore disturbed vegetation with indigenous coastal plant species. → Regularly remove waste and debris from the site to prevent pollution.
Residual impacts:	Minor disturbance to natural processes due to human presence and infrastructure maintenance. Reduced habitat quality in some areas if restoration is not fully effective.
Cumulative impact post mitigation:	Low- Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**5. Heritage Impacts** Impact on integrated heritage related aspects (palaeontological, archaeological, botanical, visual)
Nature of impact:	Negative; Intrusion of buildings in the foreground of a sensitive coastal landscape. Disturbance of a intact coastal landscape; Change in sense of place
Extent and duration of impact:	Local; long-term
Consequence of impact or risk:	Change in character of the coastal cultural landscape
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium – High
Degree to which the impact can be reversed:	Low
Indirect impacts:	Not identified
Cumulative impact prior to mitigation:	Contribution to loss of coastal landscape and access
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	***Palaeontology*** → For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP) is included in the

	Environmental Management Plan (EMP) for the proposed development. → The field supervisor/foreman and workers involved in excavations must be informed of the need to watch for fossil bones and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby archaeologist or palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find. → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense ***Archaeology*** → No archaeological mitigation is needed prior to construction excavations commencing. → Archaeological monitoring of building foundations and services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist. → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist. ***Visual*** → Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced.

	→ In addition it is recommended that the landscape and visual indicators are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines dated 12-09-2025 must be strictly adhered to to ensure long-term mitigation of the visual intrusion and impact. → This includes any new additions and alterations, an architectural and landscape design review commitee must assess each application and amendment individually and no building works or landscape works take place without prior approval. → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space. → Limiting construction to within hoarding areas. → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views. → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow. → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a "solid" wall architecture. All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property. → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".	
Residual impacts:	Potential restrictions on access to coastal resources	
Cumulative impact post mitigation:	Low – neutral	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)	Medium (-)

DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	N/A
Nature of impact:	-
Extent and duration of impact:	-
Consequence of impact or risk:	-
Probability of occurrence:	-
Degree to which the impact may cause irreplaceable loss of resources:	-
Degree to which the impact can be reversed:	-
Indirect impacts:	-
Cumulative impact prior to mitigation:	-
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-
Degree to which the impact can be avoided:	-
Degree to which the impact can be managed:	-
Degree to which the impact can be mitigated:	-
Proposed mitigation:	-
Residual impacts:	-
Cumulative impact post mitigation:	-
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	-

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

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

Terrestrial Biodiversity and Botanical Assessment

Vegetation

→ Two vegetation types are found in the designated study area on Rem Paapekuil Fontein 281, Bredasdorp, namely Southwestern Strandveld, Agulhas Limestone Fynbos and Cape Seashore Vegetation.

→ The site falls within the Southern Coastal Bioregion, with the dominant vegetation type onsite that will be impacted by the proposed development is identified as Southwestern Strandveld (EN).

→ Agulhas Limestone Fynbos is Critically Endangered B1(iii), located on the western section of the property but it will not be affected by the development on Remainder Farm Paapekuil Fontein 281.

→ No plant species of conservation concern identified during site survey.

Site Terrain and Vegetation characteristics

→ The terrain consists of moderately sloping windswept aeolian sand above a rocky shoreline of Table Mountain Group sandstone.
→ The western portion of the site includes a sandy beach transitioning to Strandveld vegetation on steeper inland slopes.
→ Erosion of aeolian sand was noted, caused by stormwater outflow from a culvert at Marine Drive.

Invasive Species

→ Invasive Alien species such as *Plantago maritima, Reseda lutea,* and *Lagunaria patersoniae* were observed, likely introduced from nearby gardens.
→ Acacia cyclops, previously prominent on-site, has been partially removed, though smaller specimens remain and require further management to prevent regrowth.

Conclusions and Recommendations

→ Two vegetation types are found in the designated study area on Rem Paapekuilsfontein 218, Bredasdorp, namely Overberg Dune Strandveld and Cape Seashore Vegetation. On a regional and national scale Overberg Dune Strandveld is considered Endangered and Cape Seashore Vegetation as Least Threatened.
→ There is agreement between the findings of this study and the WCBSP, RLE classification and the screening tool sensitivity rating for plant species. However, the terrestrial biodiversity rating of High to Very High by the screening tool is not supported by this study. The use by the screening tool of the Agulhas National Park buffer and the ESA1 conservation results in an overemphasis of the terrestrial biodiversity sensitivity. This sensitivity should be no more than Medium.
→ Alien invasive plant species are no longer a problem on the site, since they have been removed. Should the development of the site not proceed the re-infestation of the site by *Acacia cyclops* should be monitored and the plants removed as necessary.
→ The Terrestrial Biodiversity and Botanical impact post mitigation, for the preferred Alternative 5, is **low negative.**

Heritage Impact Assessment

The Heritage Impact Report included Paleontological, Archaeological and Visual Impact Assessment.

Palaeontology

→ The site primarily comprises the Peninsula Formation with potential underlying deposits of Klein Brak and Strandveld Formations.
→ The Peninsula Formation is considered high sensitivity due to potential trace fossils. Klein Brak and Strandveld Formations are considered low sensitivity due to their general composition and the likelihood of modern species.
→ The proposed development is not expected to significantly impact the palaeontological resources.
→ The impact on Palaeontology for preferred Alternative 5 is low - medium positive.

Impact Management Measures

→ For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made.

- → It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the proposed development.
- → The Fossil Finds Procedure provides guidelines to be followed in the event of fossil bone finds in the excavations. The works supervisor/foreman and workers involved in excavating the building foundations, infrastructure trenches and stormwater drainage must be informed of the need to watch for fossils and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find.
- → If a significant occurrence of fossil bones in a palaeontological context is discovered a professional palaeontologist must be appointed to collect them and to record their contexts. Said palaeontologist must also undertake the recording of the stratigraphic context and sedimentary geometry of the exposure, the sampling of ambient small fossil content and the compilation of the report for distribution to Heritage Western Cape, SAHRA, the approved curatorial institution and local heritage interest groups.
- → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.

Archaeology

- → The area has a rich archaeological history, particularly in terms of Later Stone Age shell middens and colonial-era remains.
- → A field survey identified minimal archaeological remains, primarily shellfish fragments and a few lithic artifacts.
- → The proposed development is not expected to have a significant impact on archaeological resources.
- → The impact on Archaeology for preferred Alternative 5 is low negative.

Impact Management Measures

- → No archaeological mitigation is needed prior to construction excavations commencing.
- → Archaeological monitoring of building foundations and services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist
- → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist.

Cultural landscape and Visual Impact

- → The site is situated within a semi-rural cultural landscape of high visual significance and aesthetic value.
- → The site has a high visual sensitivity due to its coastal location and scenic qualities.
- → The proposed development, if not carefully designed, could negatively impact the visual character and public access to the coastal landscape.
- → The residential visual impact for preferred alternative 5 is low negative, provided that mitigation measures recommended are fully implemented.

Impact Management Measures

→ Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced.
→ In addition it is recommended that the landscape and visual indicators are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines must be strictly adhered to to ensure long-term mitigation of the visual intrusion and impact

Overall Heritage (Visual related impacts)

Based on a synthesis of the nature, duration, intensity, extent, and probability of potential effects, the Operational Phase Visual Impact is assessed as being of High Negative Significance without mitigation. This implies that the proposed development would have a considerable influence on the visual and heritage environment, necessitating the implementation of appropriate mitigation measures.

However, the evolution of the layout (Alternative 5 – preferred), together with the adoption of a comprehensive Architectural Guideline Document, Landscape Plan, and Landscape Guideline Document, will substantially reduce visual impacts when effectively implemented. The consistent management and long-term maintenance of these measures are critical to ensuring that the development remains visually compatible with its surrounding landscape context.

In overall terms, the heritage and related visual impacts are expected to be of Medium Negative. The proposed mitigation measures particularly those relating to landscape design and architectural controls, which directly respond to identified heritage and visual indicators will assist in reducing the overall impact. Furthermore, the visual integration of the development is anticipated to improve progressively over time as vegetation establishes and the landscape matures.

Visual Impact Assessment

Visual Resources

→ The site lies in a visually and culturally sensitive coastal landscape that forms part of the scenic route along Marine Drive, Struisbaai. It contributes significantly to the coastal character and visual heritage of the area.
→ The broader Overberg region features rolling hills and agricultural patterns.
→ The area transitions from rural landscapes to flat plains with minor hills as you approach Struisbaai.
→ The site lies at a bend in the main access road (Marine Drive) connecting Struisbaai and Agulhas, offering scenic views.
→ The surrounding area is a popular tourist destination due to its proximity to Cape Agulhas.

Landscape Character Analysis

The site sits along the Struisbaai coast, nestled at the foot of small hills.

The coastline is rugged with a sense of wilderness and untouched vegetation.

Residential development exists, but the overall feel is exposed and natural.

The site offers views towards the sea and surrounding areas, further emphasized by the bend in the road.

Key Findings

→ The intactness of the coastal landscape and lack of visual intrusions enhance the scenic quality.
→ Although partially altered, the adjacent area remains part of a high-quality coastal landscape.
→ The site's position makes it highly visible from surrounding areas and Marine Drive.
→ The view catchment area is relatively small, but views are significant due to the unique coastal setting.

Impact Assessment

The development is likely to cause negative visual impacts during construction due to:

→ Site clearance and earthworks.
→ Removal of existing vegetation.
→ Noise and dust from construction activities.
→ Disruption of the existing visual character.

Construction Phase

Medium adverse significance due to vegetation removal, earthworks, and visual disturbance, but short- to medium-term.

Operational Phase:

Initially rated as High Negative Significance, due to the intrusion of new dwellings in an otherwise undeveloped coastal edge. With mitigation (design and landscaping), impacts can be reduced to Low Negative and improve over time as vegetation matures.

Mitigation Measures

→ Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced.
→ In addition, it is recommended that the landscape and visual indicators are implemented, and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines dated 12-09-2025 must be strictly adhered to to ensure long-term mitigation of the visual intrusion and impact.
→ This includes any new additions and alterations, an architectural and landscape design review committee must assess each application and amendment individually and no building works or landscape works take place without prior approval.
→ Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space.
→ Limiting construction to within hoarding areas.
→ Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public
→ Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views.
→ Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow.
→ The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a “solid” wall architecture. All

boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property.

→ The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".

Palaeontological Impact Assessment

Key Findings

→ The proposed development site is primarily composed of the Peninsula Formation, with potential underlying deposits of Klein Brak and Strandveld Formations.
→ The Peninsula Formation is considered highly sensitive due to potential trace fossils.
→ The Klein Brak and Strandveld Formations are considered low sensitivity due to their general composition and the prevalence of modern species.
→ The site's coastal location and potential for storm surges could impact subsurface deposits.

Impact Assessment

→ The proposed development, while not expected to significantly impact palaeontological resources, has the potential to disturb the subsurface deposits.
→ The primary concern is the potential impact on land and marine animal bones and archaeological material.

Management and Mitigation measures

→ Should the development proceed, proposed mitigation recommendations must be incorporated into the Environmental Management Plan (EMP) for the proposed development.
→ Palaeontological, archaeological and botanical mitigations are proposed. In addition, strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), must be enforced.
→ In brief, the heritage, landscape and visual indicators are to be implemented and these parameters are to be incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact.
→ Public access to the beach must be provided via the public walkway on subdivision 7.

Additional mitigation measures

→ Although the inspection of construction excavations may be specified in the Archaeological Impact Assessment, it is not feasible for a specialist monitor to be continuously present during the Construction Phases, when fossils may be unearthed at any time. The rescue of fossil bones during earth works critically depends on spotting this material as it is uncovered during digging.
→ For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made.
→ It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the proposed development.
→ The Fossil Finds Procedure provides guidelines to be followed in the event of fossil bone finds in the excavations. The works supervisor/foreman and workers involved in excavating the building foundations, infrastructure trenches and stormwater drainage must be informed of the need to watch for fossils and archaeological

material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find.

→ If a significant occurrence of fossil bones in a palaeontological context is discovered a professional palaeontologist must be appointed to collect them and to record their contexts. Said palaeontologist must also undertake the recording of the stratigraphic context and sedimentary geometry of the exposure, the sampling of ambient small fossil content and the compilation of the report for distribution to Heritage Western Cape, SAHRA, the approved curatorial institution and local heritage interest groups.

→ A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.

Archaeological Impact Assessment

Key findings

→ The Agulhas region has a rich archaeological history dating back over a million years, with significant Later Stone Age (LSA) sites.

→ A field survey identified minimal archaeological remains, primarily shellfish fragments and a few lithic artifacts.

→ The site's location and the nature of the proposed development pose a low risk to significant archaeological resources.

Impact Assessment

→ The proposed development is unlikely to have a significant impact on important Stone Age archaeological resources.

Impact Management measures

→ No archaeological mitigation is needed prior to construction excavations commencing.

→ Archaeological monitoring of building foundations and services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist.

→ If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist.

Terrestrial Animal Site Sensitivity Verification Report and Compliance Statement

Key Findings

→ The site has been identified as having medium Animal species sensitivity due to the potential presence of *Bitis armata* (Southern Adder) and *Aneuryphymus montanus* (Yellow-winged Grasshopper), both classified as Vulnerable.

→ An additional species, the African Black Oystercatcher (*Haematopus moquini*), was flagged by CapeNature and considered in the specialist assessment.

→ Four distinct habitat types occur on the site: Strandveld, Seashore vegetation, Seep, and Sandy beach with rocky shores, each showing varying levels of disturbance from human activity and alien invasive vegetation.
→ Birds were the most abundant fauna, primarily in the Strandveld habitat, which also supported mammals and invertebrates.
→ Reptiles were recorded in the Seashore vegetation and sandy/rocky shore habitats, while amphibians were found in the seep area.
→ None of the three species of conservation concern were observed during the field survey, indicating that the site has low terrestrial animal sensitivity according to the Gazetted Terrestrial Animal Species Protocol (2020).
→ The development footprint does not overlap with critical breeding or foraging areas, and suitable habitat within the site for these species is limited.

Impact management measures

→ Construction-phase management: Restrict all construction activities to daylight hours to minimise disturbance to nocturnal fauna. Limit vehicle and machinery movement to designated access routes and work areas to avoid unnecessary habitat disturbance. Store building materials on raised platforms or pallets to prevent their use as refuges by snakes and small mammals. No off-road driving should occur on beaches, dunes, or other sensitive habitats.
→ Wildlife protection: Enforce a no-harm policy for all wildlife encountered on-site, particularly reptiles. Any necessary relocation must be carried out by a suitably qualified and permitted handler. Prohibit domestic animals (e.g., dogs and cats) from entering the site during construction to reduce predation risk to native fauna. All site personnel should receive a brief induction on local fauna and the importance of species protection.
→ Breeding season sensitivity: During the African Black Oystercatcher (*Haematopus moquini*) breeding season (October–March), survey the immediate project footprint and adjacent beaches for active nests. If nests are present, mark and maintain a minimum 50 m no-go buffer until chicks have fledged, in consultation with CapeNature.
→ Waste management: Ensure all waste is stored in secure containers and regularly removed from the site to prevent attracting scavengers or predators. Avoid leaving food scraps or other organic waste exposed.

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

Terrestrial Biodiversity Impact Assessment

→ Since the western end of the site supporting Agulhas Limestone Fynbos would remain intact, Alternative 5 mitigates the effect of all the previous layout since the western end of the site would not be developed and incorporates more public open space.

Heritage Impact Assessment

Palaeontology

→ Should the development proceed, proposed mitigation recommendations must be incorporated into the Environmental Management Plan (EMP) for the proposed development.
→ Palaeontological, archaeological and botanical mitigations are proposed. In addition, strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), must be enforced.
→ In brief, the heritage, landscape and visual indicators are to be implemented and these parameters are to be incorporated in the planning application to ensure any new development is sensitive and cognisant of

the limitations of the site. The proposed Landscape and Architectural Guidelines must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact.

- → Public access to the beach must be provided via the public walkway on subdivision 7.
- → Although the inspection of construction excavations may be specified in the Archaeological Impact Assessment, it is not feasible for a specialist monitor to be continuously present during the Construction Phases, when fossil bones may be unearthed at any time. The rescue of fossil bones during earth works critically depends on spotting this material as it is uncovered during digging. For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP) is included in the Environmental Management Plan (EMP) for the proposed development.
- → The field supervisor/foreman and workers involved in excavations must be informed of the need to watch for fossil bones and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby archaeologist or palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find.
- → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.

Archaeology

- → No archaeological mitigation is needed prior to construction excavations commencing.
- → Archaeological monitoring of building foundations and services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist.
- → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist.

Visual

- → Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced.
- → In addition it is recommended that the landscape and visual indicators are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines dated 12-09-2025 must be strictly adhered to to ensure long-term mitigation of the visual intrusion and impact.
- → This includes any new additions and alterations, an architectural and landscape design review commitee must assess each application and amendment individually and no building works or landscape works take place without prior approval.
- → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space.

- → Limiting construction to within hoarding areas.
- → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public
- → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views.
- → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow.
- → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a "solid" wall architecture. All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property.
- → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".

Visual Impact Assessment

- → Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced.
- → In addition it is recommended that the landscape and visual indicators are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines dated 12-09-2025 must be strictly adhered to to ensure long-term mitigation of the visual intrusion and impact.
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- → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow.
- → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a "solid" wall architecture. All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property.
- → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".

Palaeontological Impact Assessment

- → The possible presence of fossils in the subsurface does not have an *a priori* influence on the decision to proceed with the proposed development. However, mitigation measures are essential. The potential impact has a moderate influence upon the proposed project, consisting of implemented mitigation measures recommended below, to be followed during the Construction Phase.
- → Although the inspection of construction excavations may be specified in the Archaeological Impact Assessment, it is not feasible for a specialist monitor to be continuously present during the Construction Phases, when fossils may be unearthed at any time. The rescue of fossil bones during earth works critically depends on spotting this material as it is uncovered during digging.
- → For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made.
- → It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the proposed development.
- → The Fossil Finds Procedure provides guidelines to be followed in the event of fossil bone finds in the excavations. The works supervisor/foreman and workers involved in excavating the building foundations, infrastructure trenches and stormwater drainage must be informed of the need to watch for fossils and archaeological material.
- → Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find.
- → If a significant occurrence of fossil bones in a palaeontological context is discovered a professional palaeontologist must be appointed to collect them and to record their contexts. Said palaeontologist must also undertake the recording of the stratigraphic context and sedimentary geometry of the exposure, the sampling of ambient small fossil content and the compilation of the report for distribution to Heritage Western Cape, SAHRA, the approved curatorial institution and local heritage interest groups.
- → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.

Archaeological Impact Assessment

- → No archaeological mitigation is needed prior to construction excavations commencing.
- → Archaeological monitoring of building foundations and services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist.
- → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist.

Terrestrial Animal Site Sensitivity Verification Report and Compliance Statement

→ Construction-phase management: Restrict all construction activities to daylight hours to minimise disturbance to nocturnal fauna. Limit vehicle and machinery movement to designated access routes and work areas to avoid unnecessary habitat disturbance. Store building materials on raised platforms or pallets to prevent their use as refuges by snakes and small mammals. No off-road driving should occur on beaches, dunes, or other sensitive habitats.

→ Wildlife protection: Enforce a no-harm policy for all wildlife encountered on-site, particularly reptiles. Any necessary relocation must be carried out by a suitably qualified and permitted handler. Prohibit domestic animals (e.g., dogs and cats) from entering the site during construction to reduce predation risk to native fauna. All site personnel should receive a brief induction on local fauna and the importance of species protection.

→ Breeding season sensitivity: During the African Black Oystercatcher (*Haematopus moquini*) breeding season (October–March), survey the immediate project footprint and adjacent beaches for active nests. If nests are present, mark and maintain a minimum 50 m no-go buffer until chicks have fledged, in consultation with CapeNature.

→ Waste management: Ensure all waste is stored in secure containers and regularly removed from the site to prevent attracting scavengers or predators. Avoid leaving food scraps or other organic waste exposed.

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

None that the EAP is aware of.

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

Positive Impacts

→ The proposed development is expected to provide short-term employment opportunities during the construction phase, benefiting local contractors and labourers.

→ The addition of residential units may support modest economic growth in the area, as new residents contribute to local spending on goods, services, and amenities.

→ By formalizing the walkway (Erf 7) and including landscaping and larger open space, the development may improve recreational opportunities and community interaction along the coastal edge.

Negative Impacts

→ The transformation of the site from an undeveloped coastal landscape to a residential area will result in changes to the character of the land, which may affect the perception of the area for community members who value its natural, open qualities.

→ The introduction of buildings, roads, and associated infrastructure will alter the visual landscape, potentially affecting scenic views, particularly from Marine Drive and surrounding public spaces, although the impacts will be mitigated over time.

→ Additional residential housing may lead to minor increases in local traffic, noise, and activity, which could be noticed by nearby residents (local scale), although the scale of the development is small and impacts are expected to be limited.

→ Construction activities may temporarily generate dust, noise, and other minor disturbances; however, these will be managed through standard mitigation measures and will be short-term in nature.

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

The Spookdraai development is located within the Coastal Protection Zone (CPZ) and in close proximity to the High-Water Mark (HWM), an area potentially exposed to the impacts of climate change, including sea-level rise, storm-surge events and increased coastal erosion. In response to these risks, the residential footprint has been repositioned more than 3 m inland from its original location and placed outside of the delineated coastal risk and storm-surge zones, as informed by the 1:100-year flood line. This inland shift ensures that no dwellings or infrastructure are situated within areas susceptible to coastal flooding or shoreline retreat, thereby aligning with the precautionary principle embedded in the National Environmental Management Act (NEMA) and the Integrated Coastal Management Act (ICMA).

The engineering design incorporates stormwater management measures to manage increased runoff intensity during extreme rainfall events, while the use of permeable surfaces and indigenous landscaping will enhance infiltration and reduce erosion potential. Additionally, the designation of the entire area below the High-Water Mark as Admiralty Zone ensures that natural coastal buffers remain intact, providing space for coastal ecosystem adaptation and shoreline migration under future sea-level rise scenarios.

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

None that the EAP is aware of.

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

The integration of the findings and recommendations from the different specialist studies has been crucial in informing the mitigation measures to manage the potential impacts of the proposed development. The comprehensive approach ensures that the development minimizes negative environmental, cultural, and visual impacts while maximizing positive outcomes for the community and surrounding ecosystem.

Terrestrial Biodiversity Assessment

The Terrestrial Biodiversity Assessment identified the presence of indigenous vegetation and sensitive ecological areas on the site. This information was critical in guiding the development's layout to avoid sensitive ecological areas, thereby minimizing the disturbance to these sensitive habitats. To further mitigate potential impacts, the layout includes more open space, which help preserve biodiversity by maintaining habitat connectivity. Additionally, phased vegetation clearing has been proposed to reduce the extent of disturbance, and an invasive species management plan will be implemented to prevent the spread of non-native plant species. The replanting of indigenous flora is another important mitigation measure that will aid in restoring natural vegetation and enhancing ecological integrity on the site.

Heritage Impact Assessment

The Heritage Impact Assessment highlighted the site's location within a coastal cultural landscape of Grade IIIA significance, emphasizing its visual and contextual importance. In response to this, the development design has been carefully planned to preserve key landscape features and ensure that public access to culturally significant areas is maintained. To address the visual impact of the development, mitigation measures such as the inclusion of visual buffers have been incorporated. These buffers, along with the use of appropriate architectural styles and materials, will help reduce the visual intrusion of the development and ensure that it complements the surrounding environment. This approach respects the heritage value of the area and aims to minimize any disruption to the sense of place for both residents and visitors.

Visual Impact Assessment

The Visual Impact Assessment recognized the site's visual sensitivity, particularly due to its coastal location and high visibility from both public and private areas. To mitigate these visual impacts, the development incorporates landscaping plans that focus on using natural vegetation to screen the structures from view. This approach helps to integrate the development into the surrounding landscape, reducing its prominence. Additionally, the design of the buildings takes into account the height and materials used, ensuring that they blend with the natural environment. These measures are aimed at reducing the visual intrusion of the development while preserving the aesthetic value of the coastal landscape.

Terrestrial Animal Site Sensitivity Verification Report and Compliance Statement

The faunal specialist confirmed the presence of four distinct habitat types within the study area: Strandveld, Seashore vegetation, Seep, and Sandy beach with rocky shores. These habitats show varying degrees of disturbance, largely resulting from human activity such as informal footpaths, with occasional patches of alien invasive vegetation further modifying the natural environment.

A diverse range of fauna was observed across these habitats. Birds were the most abundant, particularly within Strandveld, which exhibited the highest species diversity. Reptiles were found in Seashore vegetation and sandy/rocky shore areas, amphibians were recorded in the seep habitat, and mammals were observed predominantly in Strandveld. Invertebrates were present throughout the site, mostly within Strandveld.

Despite the initial screening, none of the three species of conservation concern were recorded during the site survey. Consequently, the site is assessed as having low terrestrial animal sensitivity under the Gazetted Terrestrial Animal Species Protocol (2020). Field surveys and desktop analyses indicate that no Species of Conservation Concern (SCC) are likely to be significantly impacted by the proposed development. The development footprint does not overlap with critical breeding or foraging areas, and available habitat on site is limited.

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

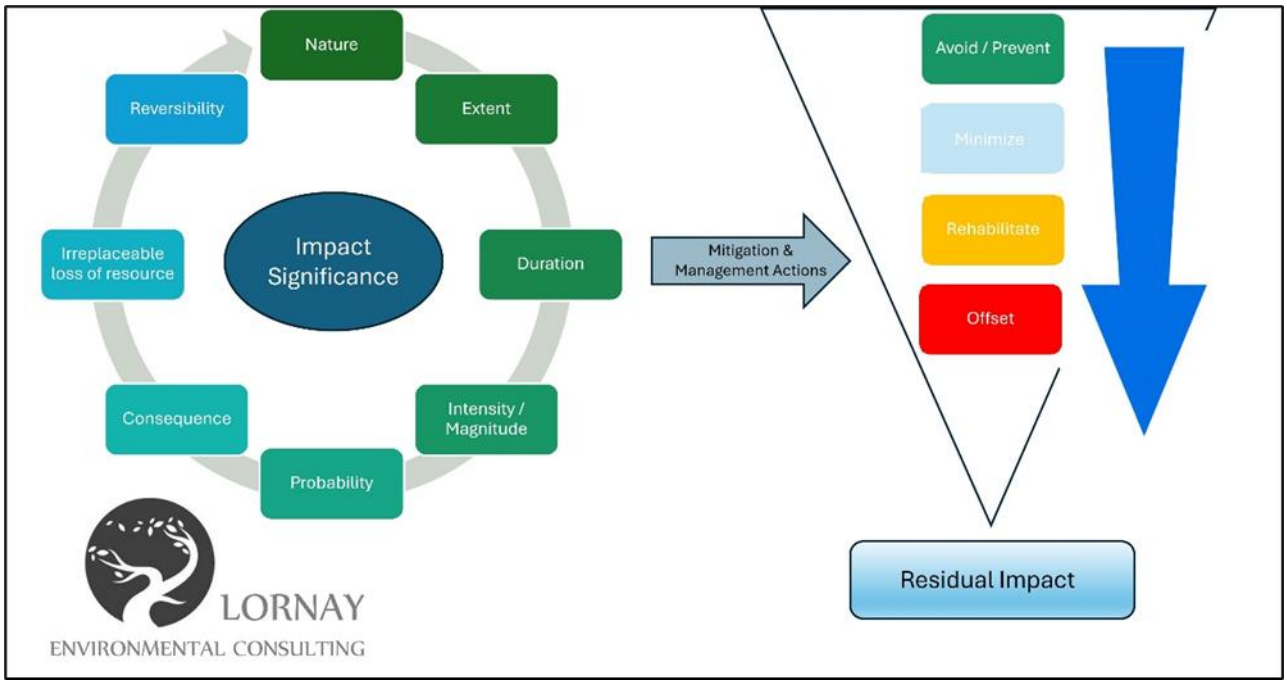


Figure 29: Mitigation hierarchy

The Mitigation Hierarchy, as prescribed by the National Environmental Management Act (NEMA), has been rigorously applied throughout the planning and design process for the proposed Spookdraai Residential Development in Struisbaai. The process follows the standard sequence of avoidance, minimization, rehabilitation, and offset, ensuring that the most practical and environmentally responsible layout was selected. Through iterative design, specialist input, and public participation, the development has evolved from initial alternatives through Alternative 4, culminating in Alternative 5, which is now identified as the preferred and most balanced layout.

Avoidance

Avoidance was the first principle applied in the mitigation hierarchy. The initial layouts (Alternatives 1–3) were assessed but found unsuitable due to several limitations, including high residential density, placement of erven within medium-sensitive vegetation areas, inadequate provision for public coastal access, and exposure to coastal risk zones such as erosion and storm surges. Alternative 4 improved upon these shortcomings by incorporating specialist recommendations, positioning residential erven above the 5 m contour line, and avoiding clearance of medium sensitive vegetation (Agulhas Limestone Fynbos) on the western portion of the site. In developing Alternative 5, avoidance measures were taken further by reducing overall residential density, repositioning dwellings inland to comply with DEADP Coastal Management guidance and preserving larger areas of natural vegetation. Additionally, sensitive cultural heritage sites were considered and retained, and public coastal access was formalized to avoid privatization of the beach, directly addressing ICMA requirements.

Moreover, the updated layout (Alternative 5) designates the area below the High-Water Mark as an Admiralty Zone, recognizing this portion of land as part of the littoral active zone intended for communal activities and public access. This ensures that natural coastal processes and public rights to coastal access are safeguarded, nd that the components of the development do not fall within this area. Furthermore, the revised layout maintains a substantial coastal buffer between the development footprint and the active shoreline, reducing exposure to coastal risks.

Minimization

Minimization measures were applied to reduce residual impacts after avoidance. This alternative introduces medium density housing in place of the originally proposed single residential erven. The revised zoning allows for a 5 m street building line and 0 m internal building line, enabling dwellings to be setback 3 m further inland compared to their original positions. Additionally, it also allows integration of larger open space erven, and strategic positioning of dwellings to enhance sightlines, visual corridors, and ecological connectivity. The western portion of the site has been designated as open space, ensuring the retention of indigenous flora and minimizing habitat fragmentation. Public coastal access has been formalized through a designated walkway along Erf 7, providing recreational and fishing opportunities while minimizing potential impacts on sensitive habitats. Visual impacts were also carefully considered; low-profile building forms and naturalistic layouts were incorporated to harmonize the development with the surrounding landscape, maintaining the aesthetic and scenic value of the Struisbaai coastal strip.

Rehabilitation

Rehabilitation measures were developed to address impacts that could not be avoided or minimized. Where indigenous vegetation is cleared within the development footprint, Alternative 5 provides for restoration and revegetation using indigenous coastal species, particularly along the main road edge and within the western open space erf. This rehabilitation will follow the approved Landscape Development Plan and Architectural Guidelines to ensure that vegetation blends naturally with the surrounding environment. A key focus is to maintain a natural green edge, free from exotic species or manicured gardens, thereby preserving both the visual and ecological integrity of the area.

Offset

Where impacts could not be fully avoided, minimised or rehabilitated the Offset requirements in terms of the Biodiversity Offset regulations are appliable. For this small-scale type of development, the Biodiversity Offset requirements are not applicable. In addition, the Terrestrial Biodiversity and Animal Species Impact after mitigation for Alternative 5 are of low significance, therefore the Biodiversity Offset Regulations are not triggered and require no further investigation.

SECTION J: GENERAL

1. Environmental Impact Statement

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

Terrestrial Biodiversity Impact Assessment Findings

→ The assessment highlights that the eastern portion of the site is Southwestern Strandveld vegetation type, whereas the western portion is Agulhas Limestone fynbos vegetation.
→ The terrain is moderately sloping consisting of deep aeolian sand above a rocky shoreline consisting of Table Mountain Group sandstone. The western part of the site has a sandy beach with the toe of the slope having a margin of Cape Seashore Vegetation with the steeper slope inland and above the beach being vegetated by Strandveld and limestone fynbos.
→ There are ongoing disturbance effects on the coastal environment.
→ Western Cape Biodiversity Spatial Mapping shows that the western part of the site is classified as ESA1, whereas the larger remainder of the site is that will be developed is not recognised as sensitive.
→ The vegetation on the erf is a poor representative of Southwestern Strandveld, with a low species-richness
→ The Botanical Assessment identifies that plant species sensitivity for the most site is low, whereas the western portion of the site plant species sensitivity should not be considered more than medium sensitivity.
→ Ecological processes on the site are closely linked to the proximity of the sea, with most of the plants being adapted to the salty, windy coastal environment.
→ The release of stormwater onto the site from culverts below the coastal road has caused some disruption of the sandy soil and, where the water erosion has occurred, revegetation is occurring naturally but is very slow.
→ No bird species were obviously using the habitat for feeding or nesting. In addition, no insect communities were evident in the Dune Strandveld habitat either.
→ The area of impact of the proposed development would be very small it would not contribute significantly to the loss of this Southwestern Strandveld ecosystem.
→ Although there would be total loss of the vegetation on the eastern part of the site, this loss would not be great over the extent of the vegetation type as a whole

Palaeontological Impact Assessment Findings

→ The wave-eroded bedrock quartzites of the Peninsula Fm. underlie the proposed development site.
→ The palaeontological sensitivity of the Peninsula Fm. bedrock is rated HIGH by the screening tool, but the proposed small development is not expected to significantly impact the trace fossil content which might be preserved in the folded and deformed strata beneath the surficial sands.
→ Fossil shells, scattered fossil bones such as from whales, dolphins, seals and seabirds may occur in the deposits but are generally very rare. These are not likely to be extinct species, but species beyond their modern-day ranges may occur.
→ In summary, both the beach deposits and aeolian coversands of the Project Area are accorded LOW palaeontological sensitivity and in the impact assessment below are considered together.
→ A typical housing development entails trenches for foundations (~0.6 m depth) and services infrastructure (up to ~1.2 m depth) and will primarily affect the coversands and will probably intersect the beach deposits in places.

Visual Impact Assessment findings

- → The Site currently forms part of a coastal cultural landscape which includes areas, views and component resources of high scenic, cultural or historical significance.
- → Due to its position on the coast and relation to the higher elevation of the surrounding areas the site is particularly visible from the surroundings areas and along the scenic route of Marine Drive and the properties along the adjacent town of Agulhas.
- → The portion of the field-of-view dominated by the proposal decreases substantially at distances beyond 1km from the site, as the proposal becomes screened by existing landforms and vegetation.
- → The Receptors of the anticipated visual impact include residential areas which are considered to have High Visual Sensitivity. The site falls within proposed urban edge, but interfaces with a coastal cultural landscape with high visual / scenic amenity value.
- → Although the area of visual influence is relatively contained and local in nature the significance of the coastal landscape setting, the unique position of the site in relation to the rest of development in Struisbaai and the scenic route of Marine Drive, results in the proposed development to have a significantly high visual impact on the scenic, heritage and visual resources.
- → Negative Visual Impact may be expected – resulting directly from site clearance, bulk earthworks and removal of existing vegetation; with construction vehicles / building activity causing noise / dust
- → The mitigation measures proposed in particular the landscape plan, Architectural guidelines and Landscape guidelines which responded to the indicators supplied, will assist in mitigating the overall impact and the visual impact will improve with time as the vegetation grows and the landscape matures.

Archaeological Impact Assessment findings

- → A few traces of archaeological heritage resources were recorded during the field study.
- → Fragments of weathered marine shellfish (mostly *Turbo sarmaticus*/ alikreukel & some limpet/ *Scutellastra longicosta*), a flaked quartz chunk, and a limestone flake (Sites 152-182) were recorded in the coastal footpath that runs alongside the rocky shoreline.
- → Traces of shellfish (*Turbo sarmaticus*) were also recorded in a few open patches of windblown sand on the vegetated slopes above the coastal track (Sites 192, 222 & 212).
- → A few fragments of weathered shellfish and several broken beach cobbles were recorded on the elevated rocky shelf at the end of the small sandy beach.
- → A few isolated fragments of shellfish were noted in the side wall of the sandy depression, but no anthropogenic remains were noted.
- → No organic remains such as pottery, bone or ostrich eggshell were found.
- → The thin traces of shellfish, very few artefactual remains, and no visible cultural items such as pottery means that the archaeological remains have been graded as having Low (lllC) local significance.
- → The results of the study indicate that, a small housing development on Farm - Re 281 (seafront) in Struisbaai, will likely not impact on important Stone Age archaeological heritage resources.

Coastal Environment

- → The property is situated within Coastal Protection Zone and the high-water mark of the sea as with the majority of Struisbaai and their coastal developed properties
- → The preferred alternative will be situated above the 5 m contour line of the sea and as far back om the erven as possible.
- → The site development plan in the preferred alternative avoids encroachment or development within coastal risk zones

→ Legal input confirms that Alternative 5 adequately adheres to the principles of ICMA – See **Appendix K.**

Terrestrial Animal Site Sensitivity Verification Report and Compliance Statement

→ The site has been identified as having medium animal species sensitivity due to the potential presence of *Bitis armata* (Southern Adder) and *Aneuryphymus montanus* (Yellow-winged Grasshopper), both classified as Vulnerable.
→ An additional species, the African Black Oystercatcher (*Haematopus moquini*), was flagged by CapeNature and considered in the specialist assessment.
→ Four distinct habitat types occur on the site: Strandveld, Seashore vegetation, Seep, and Sandy beach with rocky shores, each showing varying levels of disturbance from human activity and alien invasive vegetation.
→ Birds were the most abundant fauna, primarily in the Strandveld habitat, which also supported mammals and invertebrates.
→ Reptiles were recorded in the Seashore vegetation and sandy/rocky shore habitats, while amphibians were found in the seep area.
→ None of the three species of conservation concern were observed during the field survey, indicating that the site has low terrestrial animal sensitivity according to the Gazetted Terrestrial Animal Species Protocol (2020).
→ The development footprint does not overlap with critical breeding or foraging areas, and suitable habitat within the site for these species is limited.

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

See **Appendix B** and specialist reports

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

Alternative 1 (No-Go)

Positive Impacts

→ Preservation of the existing natural environment, including indigenous vegetation and fauna.
→ No disturbance to sensitive areas such as ecological corridors, coastal zones, or cultural heritage sites.
→ No contribution to visual or noise pollution in the area.

Negative Impacts

→ Missed opportunity to provide public coastal access.
→ No contribution to local economic development or housing needs.
→ Potential for site degradation over time due to lack of active management or conservation efforts.

Alternative 2

Positive Impacts

→ Provides new residential opportunities with proximity to the coast.
→ Development could support local economic growth through construction and tourism.

Negative Impacts

- → High density increases the environmental footprint, resulting in significant vegetation clearance and habitat loss.
- → Lack of adequate open space and no provision for public coastal access, reducing social benefits.
- → Proximity of erven to the ocean creates potential risks related to coastal erosion and flooding.
- → Poor orientation for views and wind shielding reduces liveability for future residents.
- → Limited consideration of ecological sensitivity and cultural heritage features.

Alternative 3

Positive Impacts

- → Incorporates measures to address some coastal risks, such as aligning development with the 5m contour line and risk zones.
- → Includes a public footpath providing access to the beach, enhancing social value.
- → Allocates private open space for conservation of the rocky shoreline and adjacent beach areas.

Negative Impacts

- → Increased density compared to the preferred alternative, leading to moderate vegetation clearance and habitat disturbance.
- → Departures from zoning guidelines could result in visual and aesthetic impacts.
- → Development footprint remains too close to sensitive coastal areas, increasing vulnerability to erosion and flooding.
- → Poor alignment with Heritage and Visual Impact Assessments due to the proximity of structures to the coastline and inadequate integration into the natural landscape.

Alternative 4

Positive Impacts

- → Reduced density minimizes environmental disturbance, ensuring better conservation of indigenous vegetation and habitat.
- → Substantial allocation of open space supports ecological corridors and enhances biodiversity.
- → The alternative integrates with the natural landscape, reducing visual and aesthetic impacts.
- → Coastal risk areas are avoided, enhancing long-term sustainability and safety of the property.
- → Thoughtful orientation of erven optimizes views and provides better protection from prevailing winds, increasing liveability.

Negative Impacts

- → Some disturbance to the natural environment due to construction activities.
- → Limited encroachment on ecological areas, though minimized compared to other alternatives.
- → Potential for localized noise and air pollution during construction.
- → The layout would result in the privatisation of the beachfront boundary, as the private open space area is below the High-Water Mark (HWM). This could limit public access to the coast and conflict with the principles of the Integrated Coastal Management Act (NEM: ICMA), which promotes unrestricted public access and use of coastal areas.

Alternative 5

Positive

- → Reduced density minimises environmental disturbance, with only vegetation loss within low botanical sensitive areas.
- → The layout integrates a larger Open Space (POS) zone on the western portion of the property, contributing to the retention of ecological and social value along the property and maintaining landscape permeability.
- → Provision for formal coastal access enhances public accessibility while managing potential informal and uncontrolled access.
- → The retention of the Admiralty Zone as a public coastal area ensures continued public access along the beachfront and alignment with coastal management principles under the NEM: Integrated Coastal Management Act (ICMA). Legal input confirms that Alternative 5 adequality addresses the principles and requirements of ICMA – See **Appendix K.**

Negative

- → Some disturbance to the natural environment due to construction activities.
- → Limited encroachment on ecological areas, though minimized compared to other alternatives.
- → Potential for localized noise and air pollution during construction

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

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

Based on the findings of the specialist studies and the assessment process, the following impact management outcomes are recommended:

Terrestrial Biodiversity Assessment

The main concern relates to loss of Southwestern Strandveld and/or Agulhas Limestone Fynbos vegetation type.

Mitigation measures recommended by the specialist:

- → Alien invasive plant species are no longer a problem on the site, since they have been removed. Should the development of the site not proceed the re-infestation of the site by Acacia cyclops should be monitored and the plants removed as necessary.
- → The western portion of the site as well as the development footprint should be fenced off during the construction phase to prevent further vegetation loss, all areas outside these zones must be no go areas
- → The areas that will not be developed should be restored to prevent erosion.

Heritage Impact Assessment

Palaeontology

- → Although the inspection of construction excavations may be specified in the Archaeological Impact Assessment, it is not feasible for a specialist monitor to be continuously present during the Construction Phases, when fossil bones may be unearthed at any time. The rescue of fossil bones during earth works

critically depends on spotting this material as it is uncovered during digging. For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP),is included in the Environmental Management Plan (EMP) for the proposed development.

→ The field supervisor/foreman and workers involved in excavations must be informed of the need to watch for fossil bones and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby archaeologist or palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find.

→ A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.

Archaeology

→ No archaeological mitigation is needed prior to construction excavations commencing.

→ Archaeological monitoring of building foundations and services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist.

→ If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist.

Visual

→ Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced.

→ In addition, it is recommended that the landscape and visual indicators are implemented, and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines dated 12-09-2025 must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact.

→ This includes any new additions and alterations, an architectural and landscape design review committee must assess each application and amendment individually and no building works or landscape works take place without prior approval.

→ Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space.

→ Limiting construction to within hoarding areas.

→ Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public

→ Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views.

- → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow.
- → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a "solid" wall architecture. All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property.
- → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".

Palaeontological Impact Assessment

Management outcome:

A typical conventional housing development entails trenches for foundations ((~0.6 m depth) and services infrastructure (up to ~1.2 m depth) and will primarily affect the coversands and will probably intersect the beach deposits in places. In view of the vulnerability of the proposed seashore development to infrequent, but damaging storm surges it is possible that alternative structures may be built, such as plinth and girder construction which may involve less subsurface impact. Note that the prime concern is for land and marine animal bones and archaeological material. The shell content in the Holocene raised beach deposits is not paleontologically sensitive.

According to the specialist report, the proposed small development is not expected to significantly impact the trace fossil content which might be preserved in the folded and deformed strata beneath the surficial sands. In addition to fossil shells, scattered fossil bones such as from whales, dolphins, seals and seabirds may occur in the deposits but are generally very rare. These are not likely to be extinct species, but species beyond their modern-day ranges may occur. However, the mitigation measures will be implemented as follows:

Mitigation measures recommended by the specialist:

- → The possible presence of fossils in the subsurface does not have an *a priori* influence on the decision to proceed with the proposed development. However, mitigation measures are essential. The potential impact has a moderate influence upon the proposed project, consisting of implemented mitigation measures recommended below, to be followed during the Construction Phase.
- → Although the inspection of construction excavations may be specified in the Archaeological Impact Assessment, it is not feasible for a specialist monitor to be continuously present during the Construction Phases, when fossils may be unearthed at any time. The rescue of fossil bones during earth works critically depends on spotting this material as it is uncovered during digging.
- → For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made.
- → It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the proposed development.
- → The Fossil Finds Procedure provides guidelines to be followed in the event of fossil bone finds in the excavations. The works supervisor/foreman and workers involved in excavating the building foundations, infrastructure trenches and stormwater drainage must be informed of the need to watch for fossils and archaeological material.
- → Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby palaeontologist on the nature of the find

and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find.

→ If a significant occurrence of fossil bones in a palaeontological context is discovered a professional palaeontologist must be appointed to collect them and to record their contexts. Said palaeontologist must also undertake the recording of the stratigraphic context and sedimentary geometry of the exposure, the sampling of ambient small fossil content and the compilation of the report for distribution to Heritage Western Cape, SAHRA, the approved curatorial institution and local heritage interest groups.

→ A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.

Archaeological Impact Assessment

Management outcome:

Buried shell middens, and unmarked Khoisan remains may be uncovered or intercepted during excavations for building foundations and services but the probability of this occurring, is considered to be Low.

Mitigation Measures recommended by the specialist:

→ No archaeological mitigation is needed prior to construction excavations commencing.

→ Archaeological monitoring of building foundations and services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist

→ If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist.

Visual Impact Assessment

Management outcome

Minimize visual intrusion and maintain the aesthetic integrity of the site and surroundings.

Mitigation measures recommended by the specialist

→ Strict adherence to heritage and environmental conservation and management controls, especially during the construction phases of the development (including sufficient hoarding, lighting and signage, as well as noise and dust control for occupational health and safety), should be enforced.

→ In addition, it is recommended that the landscape and visual indicators are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines dated 12-09-2025 must be strictly adhered to to ensure long-term mitigation of the visual intrusion and impact.

→ This includes any new additions and alterations, an architectural and landscape design review committee must assess each application and amendment individually and no building works or landscape works take place without prior approval.

- → Use of greening and permeable fencing along the significant edges. Provide clear sightline and view corridors by providing green buffers. Keeping the significant portion along Spookdraai as an open space.
- → Limiting construction to within hoarding areas.
- → Maintain the access to the beach and footpath which are currently along the coastline and an amenity to the public
- → Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views.
- → Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow.
- → The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas. Avoid continuous structures that may have a cumulative effect of a "solid" wall architecture. All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property.
- → The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs".

Terrestrial Animal Site Sensitivity Verification Report and Compliance Statement

Although the site is assessed as having low terrestrial animal sensitivity and no Species of Conservation Concern are expected to be significantly impacted, the following precautionary measures are recommended to ensure responsible environmental management and compliance with best-practice guidelines;

- → Construction-phase management: Restrict all construction activities to daylight hours to minimise disturbance to nocturnal fauna. Limit vehicle and machinery movement to designated access routes and work areas to avoid unnecessary habitat disturbance. Store building materials on raised platforms or pallets to prevent their use as refuges by snakes and small mammals. No off-road driving should occur on beaches, dunes, or other sensitive habitats.
- → Wildlife protection: Enforce a no-harm policy for all wildlife encountered on-site, particularly reptiles. Any necessary relocation must be carried out by a suitably qualified and permitted handler. Prohibit domestic animals (e.g., dogs and cats) from entering the site during construction to reduce predation risk to native fauna. All site personnel should receive a brief induction on local fauna and the importance of species protection.
- → Breeding season sensitivity: During the African Black Oystercatcher (Haematopus moquini) breeding season (October–March), survey the immediate project footprint and adjacent beaches for active nests. If nests are present, mark and maintain a minimum 50 m no-go buffer until chicks have fledged, in consultation with CapeNature.
- → Waste management: Ensure all waste is stored in secure containers and regularly removed from the site to prevent attracting scavengers or predators. Avoid leaving food scraps or other organic waste exposed.

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

- → It is recommended that the landscape and visual indicators are implemented and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site.
- → The proposed Landscape and Architectural Guidelines must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact.

- → If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist.
- → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.
- → The construction areas must be fenced prior to the commencement of construction. The fencing must be weatherproof. All areas outside the construction fence are strict no-go areas for the duration of development
- → Public coastal access must be maintained in the with the Access Plan as per **Appendix B.**
- → Landscaping on the seaside of the erf should be minimal with natural gardens which blend into the naturally occurring habitats

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

The proposed development, as presented in Alternative 5, should be authorised. This layout represents the culmination of a rigorous planning process, incorporating specialist input, public participation feedback, and the application of the mitigation hierarchy to achieve the best practicable environmental option. The site currently experiences high levels of informal traffic, ad hoc footpaths, and stormwater discharge, which have resulted in localized erosion. Botanical surveys confirm that the plant species present are not of conservation concern, and the proposed development footprint has been designed to avoid ecologically sensitive areas while minimising visual and environmental impacts.

Alternative 5 differs significantly from previous layouts (Alternatives 2, 3, and 4) in several respects. The development footprint is smaller, and residential erven have been repositioned inland to avoid encroachment on Coastal Risk Zones. This ensures that all dwellings are sited in safer locations, in line with recommendations from DEA&DP Coastal Management. Additionally, public coastal access has been formalised, directly addressing concerns raised during the public participation process and aligning the layout with the requirements of the Integrated Coastal Management Act (ICMA) . The western portion of the site, mapped as ESA1, is fully excluded from development and will be restored following construction, ensuring the protection of sensitive indigenous vegetation and habitats. Legal input confirms that the proposal in in line with the requirements of ICMA.

The proposed layout also integrates measures to mitigate visual and landscape impacts. Residential erven are designed to maintain sightlines and visual corridors, while open space areas are maximised to retain natural vegetation and enhance ecological connectivity. Architectural and Landscape Guidelines, will guide building design, ensuring low-profile structures that blend harmoniously with the surrounding environment. These measures collectively minimise visual intrusion and maintain the natural and cultural character of the site.

The EAP supports the conditions outlined below:

- → It is recommended that the landscape and visual indicator are implemented, and these parameters are incorporated in the planning application to ensure any new development is sensitive and cognisant of the limitations of the site. The proposed Landscape and Architectural Guidelines on page 52 of the Visual Impact Assessment must be strictly adhered to, to ensure long-term mitigation of the visual intrusion and impact.

→ If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist.

→ A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.

→ The construction areas must be fenced prior to the commencement of construction. The fencing must be weatherproof. All areas outside the construction fence are strict no-go areas for the duration of development

→ Public coastal access must be maintained via Erf 7 and in line with the public access plan (Appendix B)

→ Landscaping on the seaside of the erf should be minimal with natural gardens which blend into the naturally occurring habitats

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

None that the EAP is aware of.

2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.

This Environmental Authorisation is grated for:

→ A period of five years from the date of issue, during which the holder must commence with the authorised listed activities.

→ A period of ten (10) years, from the date the holder commenced with the authorised listed activities, during this period the authorised listed activities must be concluded.

3. Water

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.

Water will be reused and recycled where possible.

4. Waste

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

Waste is collected weekly by the municipality, and it is recycled on the dumping site.

5. Energy Efficiency

8.1.	Explain what design measures have been taken to ensure that the development proposal will be energy efficient.
It is recommended that the Landscape Architectural Guidelines be followed.	

Lornay Environmental Consulting

SECTION K: DECLARATIONS

DECLARATION OF THE APPLICANT

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

I, M.A. WURBACH, ID number 6508255219087 in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
  - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - Legitimate costs in respect of specialist(s) reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

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

24 · 10 · 2025

Signature of the Applicant: Date:

HELENICA NUMBER 1 (PTY) LTD.

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

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

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

29/10/2025

Signature of the EAP: Date:

Lornay Environmental Consulting Pty Ltd

Name of company (if applicable):

DECLARATION OF THE REVIEW EAP
NOT APPLICABLE

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

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

Signature of the EAP: Date:

Name of company (if applicable):

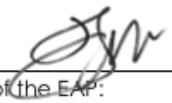
Lornay Environmental Consulting

DECLARATION OF THE SPECIALIST

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

I ..Prof Jan A Venter....., as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.



24/10/2025

Signature of the EAP: Date:

Wildlife Conservation Decision Support

Name of company (if applicable):

Lornay Environmental Consulting

DECLARATION OF THE SPECIALIST

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

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

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

Jonathan Kaplan — 25 October 2025

Signature of the EAP: Date:

Agency for Cultural Resource Management

Name of company (if applicable):

Lornay Environmental Consulting

DECLARATION OF THE SPECIALIST

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

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

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

Signature of the EAP: _____ Date: 25 October 2025

Name of company (if applicable):

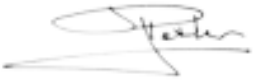
Lornay Environmental Consulting

DECLARATION OF THE SPECIALIST

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

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

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
  - ~~am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);~~
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

Signature of the EAP: 

Date: 29 October 2025

Name of company (if applicable): Sole Proprietor

PALAEONTOLOGICAL IMPACT ASSESSMENT

PROPOSED SEAFRONT DEVELOPMENT ON A PORTION OF PAAPEKUIL FONTEIN RE/281
MARINE DRIVE, STRUISBAAI, CAPE AGULHAS MUNICIPALITY
BREDASDORP MAGISTERIAL DISTRICT, WESTERN CAPE
DRAFT 27 SEPTEMBER 2023
FINAL 14 OCTOBER 2025

Lornay Environmental Consulting

DECLARATION OF THE SPECIALIST

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

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

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

29 October 2025

Signature of the EAP: Date:

Innovative Transposrt Solutions Cape (Pty)Ltd

Name of company (if applicable):

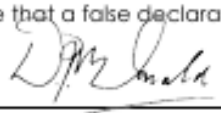
Lornay Environmental Consulting

DECLARATION OF THE SPECIALIST

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

I ...**David Jury McDonald** as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.



31 October 2025

Signature of the EAP: Date:

Bergwind Botanical Surveys & Tours CC

Name of company (if applicable):

DECLARATION OF THE REVIEW SPECIALIST

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

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

Signature of the EAP: Date:

Name of company (if applicable):