



**LORNAY**  
ENVIRONMENTAL CONSULTING

## **PROOF OF PUBLIC PARTICIPATION**

Proposed Residential dwellings and associated infrastructure

Portion 4 of the Farm 643, Stanford, Caledon RD

**June 2026**

**Consultant:**

**Michelle Naylor** | Env. Consultant | M.Sc., Pr. Sci. Nat., EAPSA  
cell: 083 245 6556 | [michelle@lornay.co.za](mailto:michelle@lornay.co.za) | [www.lornay.co.za](http://www.lornay.co.za)  
Unit 5/1F, Hemel en Aarde Wine Village, Hermanus, 7200  
Lornay Environmental Consulting Pty Ltd | Reg 2015/445417/07

## CONTENTS

1. INTRODUCTION .....	3
2. LIST OF INTERESTED AND AFFECTED PARTIES AND ORGANS OF STATE .....	4
3. WRITTEN NOTICE TO I&APS AND ORGANS OF STATE OF DRAFT BAR: .....	5
4. PROOF OF NOTICE TO I&APS AND ORGANS OF STATE .....	7
5. NEWSPAPER ADVERTISEMENT .....	10
6. NOTICEBOARDS .....	12
7. COMMENTS AND RESPONSE REPORT AND REGISTER FOR I&APS .....	15
8. COMMENTS RECEIVED DURING DRAFT / PRE-APPLICATION PUBLIC PARTICIPATION.....	53

## **1. INTRODUCTION**

The Public Participation Process was conducted in terms of the Environmental Impact Assessment (EIA) regulations as promulgated in the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) (as amended) and the 2014 NEMA EIA Regulations promulgated in Government Gazette No. 38282 and Government Notice R983, R984 and R985 on 4 December 2014 (as amended). All potential interested and affected parties (I&APS) and applicable organs of state were notified of the Draft Basic Assessment Report (BAR) . One round of public participation for the Draft BAR was conducted for a 30-day period to I&APS and organs of state, to register and comment. Noticeboards were placed on site, and a newspaper advertisement was placed in the local newspaper. All comments were recorded in a comments and response report and a register for I&APS was opened. Once the 30-day public participation on the Draft BAR was complete, all comments made were attended to and the BAR was amended as required.

**PUBLIC PARTICIPATION PROCESS 1:**  
**22 January 2026 to 23 February 2026**

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

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

<b>PRE-APPLICATION PUBLIC PARTICIPATION</b>	
<b>Organs of State</b>	
-	-
<b>WC Government Env Affairs &amp; Dev Planning</b>	<b>Department of Agriculture</b>
<b>Development Management</b>	Cor van der Walt / B. Layman
Ntanga Mabasa	<a href="mailto:Cor.VanderWalt@westerncape.gov.za">Cor.VanderWalt@westerncape.gov.za</a>
Registry Office	
1st Floor, Utilitas Building	
1 Dorp Street	
8001	
<a href="mailto:Bernadette.Osborne@westerncape.gov.za">Bernadette.Osborne@westerncape.gov.za</a>	
<b>Cape Nature</b>	<b>Overberg District Municipality</b>
Rhett Smart & Rowena Crowe	F. Kotze / R. Volschenk
<a href="mailto:rsmart@capenature.co.za">rsmart@capenature.co.za</a>	Private Bag x 22
<a href="mailto:rcrowe@capenature.co.za">rcrowe@capenature.co.za</a>	Bredasdorp
	7280
<b>BOCMA</b>	F. Kotze
R. Le Roux	<a href="mailto:rvolschenk@odm.org.za">rvolschenk@odm.org.za</a>
Private Bag x3055	
Worcester	<b>Overstrand Municipality</b>
6850	Penelope Aplon
023 346 8000	PO Box 20
	Hermanus
	7200
	<a href="mailto:paplon@overstrand.gov.za">paplon@overstrand.gov.za</a>
<b>Whale Coast Conservation</b>	<a href="mailto:carendse@overstrand.gov.za">carendse@overstrand.gov.za</a>
<a href="mailto:sheraine.wcc@gmail.com">sheraine.wcc@gmail.com</a>	
<a href="mailto:pat.miller7@outlook.com">pat.miller7@outlook.com</a>	
<b>IAPS</b>	
<b>Portion 3 of Farm 643</b>	
Jeff Grier	

<a href="mailto:jeff.grier@iwayini.co.za">jeff.grier@iwayini.co.za</a>	
<b>RE/ 643</b>	
Mike Bosman	
<a href="mailto:mike@bosmans.co.za">mike@bosmans.co.za</a>	
<b>Portion 12 of the Farm 643</b>	
<a href="mailto:sandra@rivergatefarm.co.za">sandra@rivergatefarm.co.za</a>	
<b>Portion 5 of Farm 643</b>	
Ross Breeders	
<a href="mailto:Ray.Stanbury@rpb.co.za">Ray.Stanbury@rpb.co.za</a>	
<a href="mailto:Lawrence.DeVilliers@rpb.co.za">Lawrence.DeVilliers@rpb.co.za</a>	
<b>RE/293</b>	
Richard Metcalf Family Trust	
<a href="mailto:nina@walshacres.co.za">nina@walshacres.co.za</a>	

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

The I&AP's identified above were given written notice regarding the proposed development on Portion 4 of the Farm Middelburg No. 643, via registered mail or courier, as appropriate. The written notice included details of the applicable legislation, the proposed development and means to provide comment or register as I&AP. See written notice below:



**LORNAY**  
ENVIRONMENTAL CONSULTING

22 January 2026

**NOTICE OF PUBLIC PARTICIPATION PROCESS  
PORTION 4 OF THE FARM 643, STANFORD, CALEDON RD**

Notice is hereby given of the public participation period in terms of the Environmental Impact Assessment (EIA) regulations under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), as well as the 2014 NEMA EIA Regulations (as amended) published in Government Gazette No. 38282, Government Notices R983, R984, and R985 on 4 December 2014.

You are invited to register as an Interested and Affected Party (I&AP) and/or submit comments on the Draft Basic Assessment Report for the proposed development of two single residential dwellings, a manager's cottage and associated infrastructure on Portion 4 of the Farm 643, Stanford.

A copy of the Draft Basic Assessment Report is available on our website, or upon request. Interested and Affected Parties (I&APs), as well as Organs of State, are invited to register and submit written comments. Public Participation will close on the **23 February 2026**.

**LORNAY REF:** PTN/4/643

**DEA&DP REFERENCE:** 16/3/3/6/7/1/E2/37/1155/25

**APPLICANT:** Cheddles Pty Ltd

**LOCATION:** Portion 4 of the Farm 643, Stanford

**PROJECT OVERVIEW:** The proposed development involves the establishment of two single residential dwellings, a manager's cottage and associated infrastructure on Portion 4 of the Farm 643, Stanford.

The following Listed Activities are applied for in terms of the NEMA EIA Regulations:

- **Listing Notice 1 (GN R983):** Activity 12; 17; 19; 19A
- **Listing Notice 3 (GN R985):** Activity 12; 14

**HOW TO PARTICIPATE:** Please register or submit your comment, via the following details:

**LORNAY ENVIRONMENTAL CONSULTING**

**For Att:** Michelle Naylor

**Tel:** 083 245 6556

**Email:** [comment@lornay.co.za](mailto:comment@lornay.co.za)

**Website:** [www.lornay.co.za](http://www.lornay.co.za)

**IMPORTANT NOTICE:** In accordance with the Protection of Personal Information Act (POPI Act, 2023), by registering and commenting as an I&AP your name and comments will be made public.



*Environmental Impact Assessments | Basic Assessments | 24G  
Applications | Water Use License Applications | Environmental Audits  
Lornay Environmental Consulting Pty Ltd | Reg 2015/445417/07  
Unit 5/1F, Hemel & Aarde Wine Village, Hermanus*



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

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

**michelle@lornay.co.za**

---

**From:** michelle@lornay.co.za  
**Sent:** Wednesday, 21 January 2026 11:25  
**To:** 'Ntanganedzeni Mabasa'; Rhett Smart; 'rcrowe@capenature.co.za'; 'Rafeeq Le Roux'; 'fsmith@bocma.co.za'; 'info@bocma.co.za'; Rulien Volschenk; 'Chester Arendse'; 'Penelope Aplon'; 'Brandon Layman'; 'Cor Van der Walt'  
**Cc:** DEADP EIA Admin; 'Sheraine Van Wyk'; 'pat.miller7@outlook.com'  
**Subject:** Notice of Public Participation 1 | Ptn/4/643 Stanford  
**Attachments:** Notice of PPP1 PTN 4 OF 643.pdf

Dear Organs of State and / or Interested and Affected Parties,

**THE PROPOSED DEVELOPMENT OF RESIDENTIAL DWELLINGS ON PORTION 4 OF FARM 643, CALEDON**  
**Lornay Ref: PTN/4/643**  
**DEA&DP Ref: 16/3/3/6/7/1/E2/37/1155/25**

Please see attached notice of your commenting opportunity on the Draft Basic Assessment Report for the above-mentioned case.

Should you have no comment, please ignore this notice.

Kind regards,



**LORNAY**  
**ENVIRONMENTAL CONSULTING**

*Michelle Naylor*  
*M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAAs*  
Hemel & Aarde Wine Village – Unit 5/1F  
Hermanus, 7200, South Africa  
T +27 (0) 83 245 6556  
E [michelle@lornay.co.za](mailto:michelle@lornay.co.za) | W [www.lornay.co.za](http://www.lornay.co.za)  
Reg No. 2015/445417/07 | Vat. Reg. 429 031 9468

You are receiving communication from us for professional reasons or as an identified Interested and Affected Party only. The Protection of Personal Information Act (POPIA) requires that we protect your information and that we obtain your consent to communicate with you in the future.

If you wish to be removed from any data list, please state so and we will remove your details.

Note that we will only use your personal information in a confidential and professional manner relating to this specific project.

**comment@lornay.co.za**

---

**From:** comment@lornay.co.za  
**Sent:** Wednesday, 21 January 2026 11:15  
**To:** 'Jeff GRIER'; 'mike@bosmans.co.za'; 'sandra@rivergatefarm.co.za';  
'Ray.Stanbury@rpb.co.za'; 'Lawrence.DeVilliers@rpb.co.za'; 'nina@walshacres.co.za'  
**Subject:** Notice of Public Participation 1 | Ptn/4/643 Stanford  
**Attachments:** Notice of PPP1 PTN 4 OF 643.pdf

Dear Organs of State and / or Interested and Affected Parties,

**THE PROPOSED DEVELOPMENT OF RESIDENTIAL DWELLINGS ON PORTION 4 OF FARM 643, CALEDON**  
**Lornay Ref: PTN/4/643**  
**DEA&DP Ref: 16/3/3/6/7/1/E2/37/1155/25**

Please see attached notice of your commenting opportunity on the Draft Basic Assessment Report for the above-mentioned case.

Should you have no comment, please ignore this notice.

Kind regards,



**LORNAY**

**ENVIRONMENTAL CONSULTING**

*Michelle Naylor*

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

Hemel & Aarde Wine Village – Unit 5/1F

Hermanus, 7200, South Africa

T +27 (0) 83 245 6556

E [michelle@lornay.co.za](mailto:michelle@lornay.co.za) | W [www.lornay.co.za](http://www.lornay.co.za)

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

You are receiving communication from us for professional reasons or as an identified Interested and Affected Party only. The Protection of Personal Information Act (POPIA) requires that we protect your information and that we obtain your consent to communicate with you in the future.

If you wish to be removed from any data list, please state so and we will remove your details.

Note that we will only use your personal information in a confidential and professional manner relating to this specific project.

## **5. NEWSPAPER ADVERTISEMENT**

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

## ANIMAL WELFARE CONTACT DETAILS

**HERMANUS ANIMAL WELFARE SOCIETY (HAW'S)**

028 312 1281  
adoptions@hermanusanimalwelfare.co.za

**BARC GANSBAAI ANIMAL WELFARE**

083 742 3903  
barc.animalwelfare@gmail.com

**KLEINMOND ANIMAL WELFARE SOCIETY**

028 271 5004  
kawsoffice627@gmail.com

**GRABOUW ANIMAL WELFARE SOCIETY**

071 258 5770  
admin@gaws.org.za

**STANFORD ANIMAL WELFARE SOCIETY**

064 881 2294  
sawstanford@gmail.com

**GRABOUW/BOTRIVIER R.A.D (Rescued Animal Drive)**

loveisrescue@gmail.com



### EVERY DROP COUNTS

## ALGEMENE PLAASWERKER

SAAI- EN VEEPLAAS IN DIE CALEDON OMGEWING BENODIG DIE VOLGENDE PERSOON:

- Geldige bestuurliensensie
- Minstens 3 jaar plaaservaring
- Tans op 'n plaas in die Overberg werksaam
- Betroubaar en geen drinkers
- Bereid om oortyd te werk

**SKAKEL 079 195 2661**

## BOEDELKENSIGGEWING

In die boedel van wyle **ELIZABETH SUSANNA DE KOCK** Identiteitsnommer: 360520 0024 08 4 wat woonagtig was te **Overberg Tehuis, De La Vigne Straat, Riviersonderend en wat te Riviersonderend op 7 Junie 2025** gestierf het.

Boedelnommer: **014167/2025**

Krediteure in die bogenoemde boedel word hiermee versoek om hulles eisde in te lewer by die ondergetekende binne 'n tydperk van 30 (DERTIG) dae.

**VOLSCHENK REKENMEESTERS**  
POSBUS 303, CALEDON, 7230

In the Estate of the Late **MARTHA LUISE LLEWELLYN**, Identity number: 440715 0120 08 0 of 19A Longmarket Street, Stanford who died at Hermanus on 18 October 2025, married out of community of property.

MASTER'S REFERENCE: 29424/2025

Debtors and Creditors in the above Estate are requested to pay their debts and lodge their claims with the undersigned within a period of 30 (THIRTY) days reckoned as from **FRIDAY, 23 JANUARY 2026**.

**GUTHRIE & THERON ATTORNEYS,**  
W J A D U TOIT, FOR EXECUTOR  
77 MAIN ROAD, HERMANUS  
REF: JVR/jr/VL0315

## BOEDELKENSIGGEWING

Likwidasie- en distribusierekening In die boedel van wyle **HERMANUS JACOBUS KRIEL** Identiteitsnommer: 341115 5018 08 4 wat woonagtig was te **Piet Reliefstraat 245, Sandbaai en wat te Hermanus op 21 April 2023** gestierf het.

Boedelnommer: **006593/2023**

Kennis geskied hiermee dat die Eerste- en Finale Likwidasie- en distribusierekening in die bogenoemde boedel ter insae lê ten die kantore van die Meester van die Wes-Kaap Hoë Hof, Kaapstad en die Landdros, Hermanus vir 'n tydperk van 21 dae gereken vanaf **23 Januarie 2026**.

**VOLSCHENK REKENMEESTERS**  
POSBUS 303, CALEDON, 7230

## FORM JJJ LOST OR DESTROYED NOTARIAL DEED OF CESSION

Notice is hereby given in terms of regulation 68 of the Deeds Registries Act, 1937, of the intention to apply for the issue of a certified copy of Notarial Deed of Cession No. **SK1958/2005**

passed by **PIETER TROOST JOHANNES JACOBUS CALITZ** Identity Number 590128 5179 083 and **HILDA GERTRUIDA CALITZ** Identity Number 030321 0134 088 Married in community of property to each other

in favour of **PIETER STEPHANUS SMITH** Identity number: 4007275032002 Married out of community of property

inspect of the following exclusive use area: An Exclusive use area **PARKING BAY PR27** consisting of An Exclusive Use Area described as **PARKING BAY PR27** measuring 17 (Seventeen) square metres, being as each part of the common property, comprising the land and the scheme known as **OAK TERRACE** in respect of the land and building or buildings situate at **HERMANUS IN THE OVERSTRAND MUNICIPALITY DIVISION OF CALEDON, WESTERN CAPE PROVINCE**, as shown and more fully described on Sectional Plan No. **SS 501/1997**

HELD BY Notarial Deed of Cession Number **SK 1958/2005** which has been lost or destroyed

All interested persons having objection to the issue of such copy are hereby required to lodge the same in writing with the Registrar of Deeds Cape Town, Floor 4, Information Desk, 2 Ribbok Street, Foreshore, Cape Town, CAPE TOWN, within two weeks from the date of the publication of this notice.

Dated at **HERMANUS** on 15 January 2026

**APPLICANT ON BEHALF OF PURCHASER VORSTER & STEYN ATTORNEYS HERMANUS**  
jmaritz@vorsteyn.co.za  
028 313 0033  
16 MITCHELL STREET  
HERMANUS, 7200  
REFERENCE: L01699/JMARITZ/qjvr

## LOST OR DESTROYED DEED

Notice is hereby given in terms of regulation 68 of the Deeds Registries Act, 1937, of the intention to apply for the issue of a certified copy of Certificate of Registered Grant of Leasehold **TL18424/1992**

passed by (in favour of) **TOWN COUNCIL OF ZWELIHLE NEO SEMARU** Date of Birth: **06 December 1965** Married out of community of property

in respect of the following property: **ERF 372 ZWELIHLE IN THE AREA OF THE TOWN COUNCIL OF ZWELIHLE ADMINISTRATIVE DISTRICT OF CALEDON IN EXTENT 10 (TWO HUNDRED AND TEN) Square metres**

HELD BY Certificate of Registered Grant of Leasehold **TL18424/1992** which has been lost or destroyed.

All interested persons having objection to the issue of such copy are hereby required to lodge the same in writing with the Registrar of Deeds Cape Town, Floor 4, Information Desk, 2 Ribbok Street, Foreshore, Cape Town, CAPE TOWN, within two weeks from the date of the publication of this notice.

Dated at **HERMANUS** on 06 JANUARY 2026

**VORSTER & STEYN ATTORNEYS HERMANUS**  
jmaritz@vorsteyn.co.za  
028 313 0033  
16 MITCHELL STREET  
HERMANUS, 7200

## LOST OR DESTROYED DEED

Notice is hereby given in terms of Regulation 68 of the Deeds Registries Act, 1937, of the intention to apply for the issue of a certified copy of Deed of Transfer Number **T32560/1999** passed by **ROMMEL TWINTIG BLEGGINGS CC**, Registration number **CK96/04429/23** in favour of **GERT ANDRIES DU PLOOY** Identity number **350517 5018 00 6** and **GERTRUIDA JOHANNA MARTHINA DU PLOOY** Identity number **400826 0051 08 0**, Married in community of property to each other, in respect of **ERF 1258 DE KELDERS IN THE MUNICIPALITY FOR THE AREA OF GANSBAAI, DIVISION CALEDON, PROVINCE WESTERN CAPE, IN EXTENT 162 (ONE HUNDRED AND SIXTY TWO) Square metres**, HELD BY Deed of Transfer Number **T32560/1999**, which has been lost or destroyed.

All interested persons having objection to the issue of such copy are hereby required to lodge the same in writing with the Registrar of Deeds: Western Cape at Cape Town, Floor 4, Info Desk, 2 Ribbok Street, Foreshore, Cape Town within two weeks from the date of the publication of this notice.

Dated at Rustenburg this 7th day of January 2026

Applicant **DU PLESSIS & VAN DER WESTHUIZEN INCORPORATED**

**C/O DU PLESSIS & VAN DER WESTHUIZEN INC**  
Address: 2 EDAM AVENUE, WATERVAL EAST X37, RUSTENBURG, 0299  
E-mail address: ron@dupwest.co.za  
Contact number: 014 523 4600  
Reference: **DUP390/0001**

## FORM JJJ LOST OR DESTROYED NOTARIAL DEED OF CESSION

Notice is hereby given in terms of regulation 68 of the Deeds Registries Act, 1937, of the intention to apply for the issue of a certified copy of Notarial Deed of Cession No. **SK3853/2005**

passed by **PIETER TROOST JOHANNES JACOBUS CALITZ** Identity Number 590128 5179 083 and **HILDA GERTRUIDA CALITZ** Identity Number 030321 0134 088 Married in community of property to each other

in favour of **PIETER STEPHANUS SMITH** Identity number: 4007275032002 Married out of community of property

inspect of the following exclusive use area: An Exclusive use area **PARKING BAY PR27** consisting of An Exclusive Use Area described as **PARKING BAY PR27** measuring 17 (Seventeen) square metres, being as each part of the common property, comprising the land and the scheme known as **OAK TERRACE** in respect of the land and building or buildings situate at **HERMANUS IN THE OVERSTRAND MUNICIPALITY DIVISION OF CALEDON, WESTERN CAPE PROVINCE**, as shown and more fully described on Sectional Plan No. **SS 501/1997**

HELD BY Notarial Deed of Cession Number **SK1853/2005** which has been lost or destroyed

All interested persons having objection to the issue of such copy are hereby required to lodge the same in writing with the Registrar of Deeds Cape Town, Floor 4, Information Desk, 2 Ribbok Street, Foreshore, Cape Town, CAPE TOWN, within two weeks from the date of the publication of this notice.

Dated at **HERMANUS** on 15 January 2026

APPLICANT ON BEHALF OF PURCHASER VORSTER & STEYN ATTORNEYS HERMANUS

jmaritz@vorsteyn.co.za  
028 313 0033  
16 MITCHELL STREET  
HERMANUS, 7200  
REFERENCE: L01699/JMARITZ/qjvr

## CANCELLATION OF LOST OR DESTROYED BOND

Notice is hereby given in terms of Regulation 68 of the Deeds Registries Act, 1937, of the intention to apply for the issue of a certified copy of SB6576/2025 passed by **DEIRDRE-ANN MOMBBERG**, Identity Number 631115 0136 08 8, Unmarried for a capital amount of **R1 200 000.00** in favour of **ADRIAAN WILLEM DU PLESSIS**, Identity Number 590717 5120 08 9, Unmarried in respect of certain (1) SECTION NO 8 MOMBORGMEWS, situate at **NEWLANDS, IN THE CITY OF CAPE TOWN, DIVISION CAPE, WESTERN CAPE PROVINCE, IN EXTENT 266 (TWO HUNDRED AND SIXTY) Square Metres** (2) An exclusive use area described as **STORE S17** measuring 7 (SEVEN) Square Metres, in the scheme known as **MOMBORGMEWS**, situate at **NEWLANDS, IN THE CITY OF CAPE TOWN, DIVISION CAPE, WESTERN CAPE**, which has been lost or destroyed.

All persons having objection to the issue of such copy are hereby required to contact the Registrar of Deeds: WESTERN CAPE at CAPE TOWN, FLOOR 4, RECEPTION DESK, 2 RIBBOK STREET, FORESHORE, CAPE TOWN within two weeks after the date of the publication of this notice.

Dated at **HERMANUS** on 16 January 2026

**CONVEYANCER TERTIABOTHA (LPCM98871) VORSTER & STEYN ATTORNEYS HERMANUS**  
Email: cran@vorsteyn.co.za, Tel: 028 313 0033  
**MITCHELL HOUSE, 16 MITCHELL STREET, HERMANUS, 7200**  
REFERENCE: MOMBBERG

## FORM JJJ LOST OR DESTROYED NOTARIAL DEED OF CESSION

Notice is hereby given in terms of regulation 68 of the Deeds Registries Act, 1937, of the intention to apply for the issue of a certified copy of Notarial Deed of Cession No. **SK1725/2005**

passed by **ANNE-MARIE LONG** Identity Number 311208 0911 187 Unmarried and **MARGARET SARAH FINCH** Identity Number 4407107 0132 181 Unmarried

in favour of **PIETER STEPHANUS SMITH** Identity number: 4007275032002 Married out of community of property

inspect of the following exclusive use area: An Exclusive use area **PARKING BAY PR27** consisting of An Exclusive Use Area described as **PARKING BAY PR25** measuring 19 (Nineteen) square metres, being as each part of the common property, comprising the land and the scheme known as **OAK TERRACE** in respect of the land and building or buildings situate at **HERMANUS IN THE OVERSTRAND MUNICIPALITY DIVISION OF CALEDON, WESTERN CAPE PROVINCE**, as shown and more fully described on Sectional Plan No. **SS 501/1997**

HELD BY Notarial Deed of Cession Number **SK1725/2005** which has been lost or destroyed

All interested persons having objection to the issue of such copy are hereby required to lodge the same in writing with the Registrar of Deeds Cape Town, Floor 4, Information Desk, 2 Ribbok Street, Foreshore, Cape Town, CAPE TOWN, within two weeks from the date of the publication of this notice.

Dated at **HERMANUS** on 15 January 2026

**APPLICANT ON BEHALF OF PURCHASER VORSTER & STEYN ATTORNEYS HERMANUS**  
jmaritz@vorsteyn.co.za  
028 313 0033  
16 MITCHELL STREET  
HERMANUS, 7200  
REFERENCE: L01699/JMARITZ/qjvr

## NOTICE OF PUBLIC PARTICIPATION PROCESS FOR THE PROPOSED RESIDENTIAL DWELLINGS AND ASSOCIATED INFRASTRUCTURE ON PORTION 4 OF THE FARM 643, STANFORD, CALEDON RD

Notice is hereby given of the public participation period for the above-mentioned project. In terms of the Environmental Impact Assessment (EIA) regulations under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), as well as the 2014 NEMA EIA Regulations (as amended) published in Government Gazette No. 38282, Government Notice R2003, R2004, and R2005 on 4 December 2014.

You are invited to register as an interested and affected party (I/A/P) and/or submit comments on the Draft Basic Assessment Report for the proposed development of residential dwellings and associated infrastructure on Portion 4 of the Farm 643, Stanford.

**LORNAY REF: P7K 4, 643 DEADOP REFERENCE: 16/3/24/07/11/2/37/1155/25**  
APPLICANT: Cheddies Pty Ltd  
LOCATION: Portion 4 of the Farm 643, Stanford  
PROJECT OVERVIEW: The proposed development involves the establishment of two single residential dwellings and associated infrastructure on Portion 4 of the Farm 643, Stanford.

**LISTED ACTIVITIES:** The following Listed Activities are applied for in terms of the NEMA EIA Regulations:  
→ **Listing Notice 1 (GN R203):** Activities 12; 17; 19; 19A  
→ **Listing Notice 3 (GN R205):** Activities 12; 14  
A copy of the Draft Basic Assessment Report is available on our website, or upon request. Interested and Affected Parties (I/A/Ps), as well as Organs of State, are invited to register and submit written comments. Public Participation will close on the **23 February 2026**.

Please register or submit your comment as follows:  
**Lornay Environmental Consulting**  
For Attn: Michelle Naylor  
Tel: 028 245 6556  
Email: comment@lornay.co.za  
Website: www.lornay.co.za

Lornay Environmental Consulting is the independent GAP facilitating the NEMA process only. Developer views are their own. Please provide issue-based, factual, and respectful comments only.

**IMPORTANT NOTICE:** In accordance with the Protection of Personal Information Act (POPIA) 2023, by registering and completing an I/A/P you consent to our use of your personal information for the purposes of the NEMA process only. Your personal information will be used for:

- 240 Applications (Water Use Licenses Applications) [Environmental Act]



## BECOME A KAUAI FRANCHISEE.

Kauai, South Africa's leading health food restaurant brand, is looking for the right franchisee for a new store in Hermanus. There's rapidly growing demand for healthy food across the country, and the right person can help meet this need in Hermanus. If you're passionate about wellness and nutrition and ready to be actively involved in running a purpose-driven business, we'd love to hear from you. Candidates must have a minimum capital of R1.8 million to apply. Get in touch with us at [franchising@kauai.co.za](mailto:franchising@kauai.co.za) to explore whether you're the right person to grow with us in Hermanus.



FOLLOW US @kauaiglobal  
[WWW.KAUAI.CO.ZA](http://WWW.KAUAI.CO.ZA)

## 6. NOTICEBOARDS

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







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

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

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



## COMMENTS AND RESPONSE REPORT

**PROJECT:** PTN 4 OF THE FARM 643

### DRAFT BAR / PRE-APPLICATION

NAME:	COMMENT:	RESPONSE:	DATE & REF:
<p>Chester Arendse (Overstrand Municipality)</p>	<p>Your email dated 21st January 2026, please find attached comments from the Overstrand Environmental Management &amp; Conservation Division on the Public Participation Process Application for Farm 643 Portion 4, Stanford.</p> <p>Upon feedback provided from the Department of Environmental Affairs and Development Planning (DEA&amp;DP), additional comments might be provided. With regards to this application, the EM&amp;C does not approve this application yet.</p> <p>A well-drafted report was submitted, and all the aspects were noted. Part of that, the following points were highlighted and noted:</p> <ul style="list-style-type: none"> <li>Specialist studies further support authorization of the development. The botanical specialist confirmed that the vegetation on site is of low ecological sensitivity, with no presence of Agulhas Limestone Fynbos or any plant</li> </ul>		<p><b>Date:</b> 23/02/26</p>

	<p>Species of Conservation Concern.</p> <ul style="list-style-type: none"> <li>• Similarly, the faunal specialist determined the Site Ecological Importance to be low, with impacts manageable through appropriate mitigation.</li> <li>• Based on the assessments that were conducted, it is advised that Alternative 3 would be the most suitable option. This option highlights important aspects of avoiding ecologically sensitive areas, and integrates all specialist recommendations, the development can be undertaken in an environmentally responsible manner</li> </ul> <p>It is also noted that the following conditions should apply once authorization is obtained:</p> <ul style="list-style-type: none"> <li>• All essential service infrastructure will be off grid, with water sourced from groundwater under Schedule 1 domestic use, and sewage managed through a closed conservancy tank serviced by the</li> <li>• Overstrand Municipality. Importantly, the residential dwellings, conservancy tanks, and all associated infrastructure will be positioned above the 5 m contour, more than 100 m from the High-Water Mark of the watercourse, and more than 32 m from the Klein Rivier, thereby avoiding flood-prone and ecologically sensitive riparian zones.</li> <li>• Keep developing outside the 50 m no-go buffer surrounding mapped katydid habitat.</li> <li>• Maintain all permanent structures and service infrastructure above the 5 m contour and more than 100 m from the High-Water Mark of the Klein Rivier.</li> <li>• Limit vegetation clearing strictly to the development footprint and retain at least 70% of the property under natural vegetation cover to maintain ecological connectivity.</li> <li>• Implement an alien vegetation control programme throughout the property, including long-term monitoring</li> </ul>	<p>Comment is noted. However, it should be noted that the new preferred alternative has been updated, and the new preferred alternative is Alternative 4 which responds to al the concerns raised by the organs of state and is in line with the relevant specialist recommendations.</p>	
--	--	---	--

	<p>and clearing of invasive species.</p> <ul style="list-style-type: none"> <li>• Avoid disturbance to mature wild olive trees and other structurally significant indigenous vegetation.</li> <li>• Design and construct the jetties and slipways in a manner that minimizes watercourse disturbance, and ensures no infilling, excavation, or pollution occurs within the river.</li> <li>• Implement all faunal protection measures, including pre-construction walk-throughs, no-go areas, and strict management of construction activities to avoid harm to Species of Conservation Concern.</li> <li>• Use alien clearing and appropriate fire management to preserve a patchy vegetation structure, favouring species sensitive to tall, dense shrub encroachment.</li> <li>• It is also noted that the proposed road to be developed will not be wider than 4m</li> </ul> <p>Farm 643 Portion 4 falls within the Coastal Protection EMOZ and Rural Risk Zones, and under this the following conditions should be adhered to:</p> <ul style="list-style-type: none"> <li>• After construction, any exposed ground area must be stabilized using ground covering plants or mulches to minimize the risk of erosion.</li> <li>• Any new development must be designed and positioned within reason to limit potential flood damage and risk to human life, including but not limited to positioning buildings in suitably acceptable elevated portions of properties.</li> <li>• Planting or harboring of declared alien invasive vegetation on property is prohibited.</li> <li>• Discharge of grey water or domestic effluent within any natural system is prohibited.</li> <li>• No land user within this EMO may utilize the vegetation in a vlei, marsh or within the flood area of watercourse in a manner that may cause deterioration or damage to the natural resources.</li> </ul>	<p>Comment is noted. These conditions have been integrated into the BAR and the EMPr.</p>	
--	---	---	--

	<ul style="list-style-type: none"> <li>Disposal of cigarette butts, ash or other hazardous material in any place or manner other than a receptable designated for such items.</li> </ul> <p>The Municipality reserves the right to revise these comments based on the availability of new information</p>		
<p>Vhengani Ligudu (BOCMA)</p>	<p>RE: THE PROPOSED DEVELOPMENT OF RESIDENTIAL DWELLINGS ON PORTION 4 OF THE FARM 643, CALEDON</p> <p>With reference to the above-mentioned document received by this office on 27/01/2026, requesting comments.</p> <p><u>This office, Breede-Olifants Catchment Management Agency (BOCMA) has reviewed the report and has the following comments:</u></p> <ol style="list-style-type: none"> <li>All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered.</li> <li>The desktop assessment indicates that the property is located along the Klein River and is mapped as an estuary. Kindly confirm whether any wetlands occur within or near the property.</li> </ol> <p><u>General Conditions:</u></p> <ul style="list-style-type: none"> <li>The disposal of sewage must at all times comply with the requirements of Sections 22 and 40 of the National Water Act of 1998, (Act 36 of 1998).</li> <li>In the event of water abstraction from any water</li> </ul>	<p>Comment is noted. The proposed major construction activities as well as the operational activities of the development shows adherence to NWA legislations. As indicated in the Aquatic Compliance Statement, the northern portion of the site falls within the extent of the Klein River estuary. No additional aquatic features mapped within the remainder of the site.</p> <p>The National Geo-Spatial Information (NGI) River line vector data (2019) indicates the Klein River associated with the estuary along the northern border of the site, no additional rivers are located within the 100 m regulated proximity of the study site. Additionally, no watercourse or wetland indicators were identified within the proposed site.</p>	<p><b>Date:</b> 23/02/26</p>

	<p>resource, the necessary authorisation must be obtained from this office or the Department.</p> <ul style="list-style-type: none"> <li>• No pollution of surface water or groundwater resources may occur.</li> <li>• Stormwater management must be addressed both in terms of flooding, erosion and pollution potential.</li> <li>• No stormwater runoff from any premises containing waste, or water containing waste emanating from industrial activities may be discharged into a water resource. Polluted stormwater must be contained.</li> <li>• Please note that engaging in activity that triggers the National Water Act without authorisation is an offence and will result in the BOCMA taking legal action against the proponent in terms of Section 151 of the National Water Act, 1998 (Act 36 of 1998).</li> </ul> <p>This office reserves the right to revise initial comments and request further information based on any additional information that may be received. The onus remains with the registered property owner to confirm adherence to any other relevant legislation that any activities might trigger and/or need authorization.</p> <p>Please do not hesitate to contact the above official should there be any queries.</p> <p>Yours faithfully</p>		
<p>Rulien Volschenk        (Overberg District Municipality)</p>	<p>RE: NOTICE OF PUBLIC PARTICIPATION PROCESS PORTION 4 OF THE FARM 643, STANFORD, CALEDON</p> <p>The Environmental Management Services Department of the Overberg District Municipality hereby acknowledges receipt of the Basic Assessment Report for the proposed establishment of two single residential dwellings, manager’s cottage, jetty, slipway, swimming pool, and a fire pit.</p>		<p><b>Date:</b> 23/02/26</p>

	<p>The Municipality supports the placement if the proposed development behind the Coastal Management Line (CML) and the 5m contour. However, the applicant should take note that the proposed residential dwellings remain located within the designated Rural Risk Zone (RRZ). These regulatory zones play a critical role in guiding appropriate development within coastal areas, ensuring that environmental sensitivities and potential risks are adequately managed. The primary objectives of the coastal management (setback) line include:</p> <ul style="list-style-type: none"> <li>• Protecting costal public property, private asserts, and public safety;</li> <li>• Identifying and conserving features within the coastal protection zone;</li> <li>• Preserving the aesthetic, ecological, and cultural integrity of the costal landscape.</li> </ul> <p>The applicant must ensure that suitable mitigation measures are implemented to safeguard infrastructure against extreme flood events.</p> <p>It is noted that the Botanical specialist concluded that the vegetation type on the property does not constitute Agulhas Limestone Fynbos but rather an undescribed shrubland. The protection of indigenous habitat remains important, and mitigation measures that limit the extent of development and prevent further degradation of the receiving environment should be prioritised. In accordance with the National Environmental Management: Biodiversity Act, 2004, and the Conservation of Agricultural Resources Act, 1983, landowners are responsible for the management and control of invasive species on their properties. An alien vegetation management plan should therefore be developed and implemented for the entire property to avoid further impacts on sensitive ecosystems.</p> <p>The Overberg District Municipality reserves the right to amend</p>	<p>Comment is acknowledged. The coastal risk zones and coastal management lines have been duly considered and incorporated into the Preferred Layout Alternative. The BAR and the proposed layout also make reference to the Rural Risk Zone and discuss the development intent, demonstrating that the amended layout aligns with the primary objectives of the coastal management line in accordance with the requirements of the National Environmental Management: Integrated Coastal Management Act (NEM:ICMA).</p> <p>Noted. The specialist studies undertaken for this assessment identified the no-go areas, buffer areas which need to be incorporated and considered to safeguard the surrounding environment as well as to protect the ecological integrity of the site and the adjacent Klein river estuary. All these have been taken into consideration in the current preferred layout (Alternative 4).</p>	
--	---	--	--

	<p>these comments or request further information should additional relevant details become available.</p> <p>Yours sincerely,</p>		
<p>Rhett Smart (Cape Nature)</p>	<p>Pre-Application Basic Assessment Report for the Proposed Residential Dwellings, Jetty and Slipway on Portion 4 of Farm Middelburg 643, Stanford</p> <p>CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments.</p> <p><b>Desktop Information</b></p> <p>The property is mapped as Critical Biodiversity Area 1 (CBA) in the current official Western Cape Biodiversity Spatial Plan. The vegetation occurring on site is mapped as Agulhas Limestone Fynbos in the National Vegetation Map, which is listed as critically endangered. The property is bordered by the Klein River Estuary and associated estuarine functional zone (EFZ) to the north with no additional aquatic features mapped.</p> <p>The results from the screening tool indicate a very high sensitivity for terrestrial biodiversity and aquatic biodiversity, high sensitivity for animal species and medium sensitivity for plant species. The site sensitivity verification indicates that the terrestrial biodiversity and plant species themes are addressed in the one specialist study and the animal species theme in another specialist study.</p> <p>It is motivated that no specialist study is required for the aquatic biodiversity theme, as only the jetty, slipway, fire pit and swimming pool are located below the 5 m contour within the EFZ. This motivation is not supported, as the Klein River Estuary is a national priority estuary and it will be impacted upon by the jetty and slipway. It is also likely that authorisation will be required in</p>	<p>The Aquatic Compliance Statement was undertaken and confirms that the development is not located within or near a wetland. It is noted that the National Geo-Spatial Information (NGI) River line vector data (2019) indicates the Klein River associated with the estuary along the northern border of the site, no</p>	<p><b>Date:</b> 23/02/26</p>

	<p>terms of the National Water Act which would require input from an aquatic biodiversity specialist.</p> <p>It is necessary to refer to the precedent for the development on the adjacent property to the east, Portion 3 of Farm 643, where there was an application for a main dwelling in 2024. In that case, the application was for the adoption of an ad hoc setback line, as it was determined that the vegetation occurring on site does not fall within an endangered or critically endangered ecosystem, and therefore Listing Notice 3 Activity 12 was not triggered. The only activities which were triggered, as determined, were Listing Notice 1 Activity 17 and Listing Notice 1 Activity 19A for which an ad hoc setback line can be adopted.</p> <p><b>Botanical and Terrestrial Biodiversity Assessment</b></p> <p>The botanical and terrestrial biodiversity assessment was undertaken by the same specialist as for 3/643 referred to above and reference is made to the study on 3/643. In this regard the vegetation on 3/643 was confirmed to not consist of Agulhas Limestone Fynbos based on the species composition and further confirmed by the geology, as the site is not underlain by limestone. It was further motivated that the vegetation had been disturbed by historical agricultural activities and more recently impacted by lack of fire. The assessment states that the same is true for 4/643 and the description for the study on 3/643 is repeated. Species lists are provided of species occurring on both properties and only on the two individual properties.</p> <p>Two main habitat types are described, namely: the floodplain of the Klein River Estuary consisting of reedbeds flanked by buffalo grass (<i>Stenotaphrum secundatum</i>) with isolated shrubs; and mid-high to tall dense shrubland over the remainder of the property</p>	<p>additional rivers are located within the 100 m regulated proximity of the study site. Additionally, no watercourse or wetland indicators were identified within the proposed site. Therefore, a Water Use License is not required.</p> <p>Noted.</p>	
--	--	---	--

	<p>with thicket patches. The vegetation is described as moribund and in need of fire for rejuvenation. The conclusion is that the vegetation is not Agulhas Limestone Fynbos but an undescribed shrubland and therefore the vegetation can be considered the same as is located on 3/643. The additional species listed for 4/643 mainly consist of disturbance tolerant species including exotic species and listed alien invasive species.</p> <p>Therefore, it is necessary to interrogate why Listing Notice 3 Activity 12 is applicable to this application and not 3/643. In this regard we wish to note that Listing Notice 3 Activity 12 also refers to clearing indigenous vegetation within 100 m of the high water mark of the EFZ in addition to clearing indigenous vegetation within a critically endangered or endangered ecosystem. Listing Notice 3 Activity 12 is therefore relevant to this application regardless of the vegetation classification and should have applied for 3/643, and there is no ad hoc setback line exclusion for this activity. It is possible that the SANBI Red Listed Ecosystem remnants layer was used for the interpretation of the presence of natural habitat, as most of 3/643 is not included but 4/643 is. It would appear that the SANBI remnants layer is based on the Department of Forestry, Fisheries and the Environment (DFFE) land cover data (2018, 2020 and 2022) as the mapping matches up.</p> <p>With regards to 3/643, we wish to note that there was extensive engagement between CapeNature and the project team regarding the classification of the vegetation type, including a site visit. There was also engagement between the environmental assessment practitioner and SANBI. We maintain our stance as previously that the vegetation occurring on site should be aligned to an existing vegetation type or otherwise would need to be recognised by SANBI as a new vegetation type. Should the interpretation be that secondary vegetation that arises after disturbance which is not representative of the original critically endangered or endangered vegetation type prior to disturbance</p>	<p>The comment is noted. However, since the vegetation onsite remains unclassified as per the botanical specialist assessment. Additionally, since the site was not cleared on indigenous vegetation during the past 10 years, Listing Notice 3; Activity 12 is applicable.</p> <p>Noted.</p>	
--	---	---	--

	<p>be interpreted as not triggering Listing Notice 3 Activity 12, this must be officially accepted and applied and would need to be more clearly defined in order to qualify. It is however acknowledged that secondary vegetation such as that occurring on site is of significantly lower biodiversity value from a botanical perspective than the original vegetation type. In this case the original vegetation type would not have been Agulhas Limestone Fynbos in any case as was agreed by both botanists, but possibly Western Rûens Shale Renosterveld.</p> <p>With regards to the historical disturbance, the 3&amp;4/643 were not cultivated in a long period of time based on the evidence from historical aerial imagery. There is no evidence of cultivation during the extent of historical Google Earth imagery extending back to 2003, despite that the sites were mapped as cultivated with lucerne/medics in the 2013 Department of Agriculture crop census. Older imagery from the National Geospatial Information (NGI) portal indicates that the sites were cultivated in 1976 with vegetation re-establishing in the 1989 imagery.</p> <p>The site ecological importance (SEI) is calculated, although there were no Species of Conservation Concern (SCCs) identified. Three alternative layouts were presented with the first proposed layout of the dwelling encroaching into the EFZ and the other two layouts (including project preferred alternative) staying out of the EFZ apart from the structures mentioned above. The residual impact after mitigation is rated as medium for the first layout and low for the other two layouts. The mitigation measures include standard mitigation which is supported.</p> <p>We wish to note that there are records of plant SCCs on iNaturalist, despite the statement in the botanical assessment that there are no other records for the site other than those from the botanical study. We therefore recommend that these records need to be reviewed and the report amended as required.</p>	<p>Noted. However, the site contains areas showing previous disturbances</p> <p>Noted.</p> <p>Comment is noted. It is also important to note that iNaturalist was consulted by the appointed botanical specialist.</p>	
--	--	--	--

	<p><b>Terrestrial Animal Species Assessment</b></p> <p>The terrestrial animal species assessment identified five faunal habitats on the site, namely Phragmites reedbeds, Kikuyu grass, dense shrubland fynbos, open shrubland fynbos and Eucalyptus stands. We wish to note that the botanist did not record alien invasive Kikuyu grass (previously <i>Pennisetum clandestinum</i>, now <i>Cenchrus clandestinus</i>) but did record buffalo grass (<i>Stenotaphrum secundatum</i>) and couch/kweek grass (<i>Cynodon dactylon</i>).</p> <p>An extensive species list is provided of the species recorded on site during the three diurnal and nocturnal field site visits in August and within the five habitats encompassing mammals, birds, reptiles, amphibians and invertebrates. A total of 11 SCCs were recorded. Bontebok (<i>Damaliscus pygargus pygargus</i>) is listed as vulnerable however they were introduced to the property. The site is however within the natural distribution range of the species (Cowell &amp; Birss 2017). We are aware that there was a captivity permit for bontebok on 3/643 and wish to query if they are the same animals. The list of five additional SCCs considered likely to occur on site in addition to those flagged in the screening tool includes four species which are included in the list of species recorded, therefore it should be one additional species.</p> <p>The assessment includes determination of the SEI and an assessment of the impact of the development on the SCCs flagged in the screening tool, recorded on site and predicted to occur. The SEI is rated as high for Black Harrier (<i>Circus maurus</i>), southern adder (<i>Bitis armata</i>) and mute winter katydid (<i>Brinkiella aptera</i>). Targeted surveys of the mute winter katydid were undertaken with a total of 43 individuals recorded and the key habitats on site were mapped. A 50 m high sensitivity buffer zone was designated from the identified habitat. The preferred layout was designed based on the avoidance of this buffer zone for the second dwelling.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	
--	---	---	--

	<p>It is noted that the 10 SCCs restricted to the estuarine habitat are rated as low SEI, as the proposed development is located outside of the EFZ. The African Marsh Harrier (<i>Circus ranivorus</i>) which was observed utilizing the reedbed habitat is however rated as medium SEI.</p> <p>Impact assessment tables are provided for each species as well as faunal connectivity. The residual impact for Black Harrier and faunal connectivity can be reduced to low-medium and for the other impacts low or less. A number of mitigation measures are listed, all of which must be considered as essential mitigation and included within the Environmental Management Programme (EMPr). Key mitigation measures worth noting include conserving the property through a stewardship agreement or similar, reducing the number of jetties from two to one and maintaining a buffer from the reed margins and estuary edges.</p> <p>We wish to note that it is proposed by members of the Stanford community to encourage all landowners downstream of Stanford to clear their properties of reeds as a flood risk mitigation measure. CapeNature has concerns regarding the ecological impacts of this action as the reedbeds are important faunal habitat e.g. African Marsh Harrier. Although not part of the application, we recommend that the faunal specialist should provide input on this proposal and it should be included as a required mitigation measure/restriction for consideration for authorisation.</p> <p>We wish to note that the outcome from the animal species assessment provides evidence that even if the plant species diversity of a property containing mature secondary vegetation is low, it can still provide important faunal habitat. It is further noted that specialist studies and application of the screening tool is not required for ad hoc setback line applications.</p> <p><b>Coastal Setback, Jetty and Slipway</b></p>	<p>The applicant must engage with Cape Nature in finding a suitable conservation mechanism for the remainder of the property.</p> <p>It is important to note that the control of reeds has been incorporated into the MMP as one of the method statements.</p>	
--	--	--	--

	<p>The primary buildings associated with the proposed development are located outside of the EFZ and therefore also behind the coastal management line. The proposed development is however located within the coastal protection zone and therefore the regulations for the Coastal Protection Zone Environmental Management Overlay Zone (EMOZ) of the Overstrand Municipality must be adhered to. The Klein River Estuarine Management Plan must also be adhered to.</p> <p>As noted above, the current preferred layout has reduced the number of jetties from two – one for each dwelling - to a single jetty. CapeNature has a draft policy which is used in evaluating applications for jetties in terms of the Sea Shore Act and for NEMA applications. Sea Shore Leases are only issued once environmental authorisation is obtained. The policy states a maximum of one jetty per dwelling, however ideally it is preferred to only have one jetty per property therefore the reduction to a single jetty is supported. The other specifications in the CapeNature policy should also be adhered to.</p> <p>CapeNature does not support private slipways. Slipways have a more significant impact on the estuary banks than jetties in terms of a hard structure which can increase erosion and alter flow. In the case of the current property, it is located within close proximity (<math>\pm 2</math> km) to the public slipway in Stanford which can be used to launch boats. CapeNature therefore objects to the proposed slipway. We further recommend that the Department of Environmental Affairs and Development Planning (DEA&amp;DP) Coastal Management component should provide comment on the proposed jetty and slipway.</p> <p>The proposed jetty and slipway must be assessed in the aquatic biodiversity specialist study which we recommended above. It must be ensured that the location of the proposed jetty will have minimal impact on the hydrology and ecological function of the system. The specialist should ideally have expertise in estuarine</p>	<p>The proposal adheres to the Klein River Estuarine Management Plan.</p> <p>Noted.</p> <p>The slipway is completely removed from the development component proposed on the subject property. However, a pathway is proposed to provide access to the proposed jetty infrastructure.</p> <p>An Aquatic Biodiversity Compliance Statement has been undertaken and involves the assessment of the proposed jetty and pathway. It is important to note that the slipway no longer forms part of the development components, a pathway is proposed</p>	
--	---	--	--

	<p>systems. The potential impact of reed clearing should also be assessed in the aquatic biodiversity study.</p> <p><b>Conclusion</b></p> <p>In conclusion, an aquatic biodiversity specialist study must be undertaken to assess the impact of the proposed jetty and slipway on the Klein River Estuary and associated habitats before the application is considered further. CapeNature does not support private slipways, especially when there is a public slipway in close proximity that can be used. We are satisfied that the impacts on terrestrial biodiversity have been adequately addressed, however queries raised above must be responded to and confirmation provided regarding implementation of the proposed mitigation measures.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>instead.</p> <p>Aquatic Biodiversity Compliance Statement was commissioned.</p> <p>Noted, a slipway no longer forms part of the development components.</p>	
<p>Ntanganedzeni Mabasa DEADP: Development Management</p>	<p>COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (“BAR”) IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (“NEMA”), 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT (“EIA”) REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 4 OF FARM NO. 643, STANFORD</p> <ol style="list-style-type: none"> <li>1. The electronic copy of the draft BAR, as received by the Directorate: Development Management (“this Directorate”) on 21 January 2026, and the Directorate’s acknowledgement thereof issued on 29 January 2026, refer.</li> <li>2. This Directorate’s comment is as follows:             <ol style="list-style-type: none"> <li>2.1. According to the latest google earth imagery, potential vegetation clearance may have been undertaken along</li> </ol> </li> </ol>	<p>The area is approximately less than 100m<sup>2</sup></p>	<p>23/02/26</p>

	<p>the boundary of the site bordering the river/estuary, as well as an area next to the development footprint designated for the manager’s cottage. This may constitute unlawful commencement of a listed activity. Clarity must be provided in this regard.</p> <p>2.2. The Terrestrial Animal Site Sensitivity Verification and Species Specialist Assessment Report dated December 2025, compiled by Wildlife Conservation Decision Support includes a recommendation that consideration should be given to assign all retained natural habitat (approximately 70% of site) to a formal conservation status, such as a stewardship agreement, to ensure long-term ecological management, and to secure long-term management of estuary-edge natural habitat through stewardship or conservation agreements. Since it is stated that the development is deemed acceptable under strict conditions, including the long-term ecological management of undeveloped areas, confirmation is required whether these specialist recommendations will be implemented. In addition, comment must be obtained from CapeNature whether the recommendations are supported.</p> <p>2.3. The Terrestrial Biodiversity Impact Assessment dated October 2025, compiled by Bergwind Botanical Surveys cc concluded that the vegetation present on the site is not representative of mapped critically endangered Agulhas Limestone Fynbos and that the Critical Biodiversity Area mapping in terms of the 2024 Western Cape Biodiversity Spatial Plan (“WCBSP”) is incorrect.</p> <p>CapeNature has developed a WCBSP verification protocol. Only CapeNature can provide official confirmation whether a change in the mapping is warranted or not. Furthermore, there is a formal process that must be followed to obtain this confirmation. Unless the required confirmation is obtained, the mapping must be</p>	<p>Cape Nature acknowledged the recommended mitigation measures. See Cape Nature’s comment attached above.</p> <p>Noted.</p> <p>See Cape Nature’s comment attached above.</p>	
--	--	---	--

	<p>considered and remains applicable. In addition, comment must be obtained from CapeNature regarding the Terrestrial Biodiversity Impact Assessment findings.</p> <p>2.4. As stated in the correspondence dated 22 April 2025, this Directorate reiterates that given the development’s proximity to the Kleinrivier Estuary additional specialist input may be required. Especially given that the proposed development footprint is within the coastal protection zone, which is generally not supported. Hence, should any authority that has jurisdiction in respect of any aspect of the proposed development request that further specialist studies be conducted, and where the request is supported by this Directorate, this must take precedence (i.e. comment from this Department’s Coastal Management Sub-Directorate, CapeNature and the local and district municipality).</p> <p>2.5. Written confirmation must be obtained from a registered service provider that they have available capacity to regularly empty the conservancy tank and written confirmation is required from the municipality of sufficient capacity at the Wastewater Treatment Works to service the proposed development.</p> <p>2.6. Similarly, written confirmation must be obtained from a registered service provider that they have available capacity to provide the required solid waste removal services and the municipality must confirm that there is sufficient capacity at the landfill site to service the proposed development.</p> <p>2.7. Confirmation is required from the Breede-Olifants Catchment Management Agency (“BOCMA”) whether the proposed development triggers any water uses that will require approval in terms of the National Water Act, 1998 (Act No. 36 of 1998) (“NWA”). If a Water Use Licence Application (“WULA”) is required, proof of submission of the application to the BOCMA and a copy of the WULA</p>	<p>Concerns and recommendations raised by the relevant authorities have been taken into account in the new updated SDP (Alternative 4).</p> <p>The service confirmation report is still pending and will be included in the final submission of the BAR.</p> <p>The service confirmation report is still pending and will be included in the final submission of the BAR.</p> <p>Subsequent to the correspondence from BOCMA, a confirmation of the nearby wetlands or watercourses was required. The Aquatic Biodiversity Compliance Statement was commissioned and confirmed that the</p>	
--	---	---	--

	<p>Information must be included in the BAR.</p> <p>2.8. The Site Development Plan (“SDP”) of the preferred alternative must include any buffer / no-go areas that will be incorporated, as recommended by the specialist findings, especially if is the remainder of the site will be conserved. The updated SDP must also be included the Environmental Management Programme (“EMPr”), as per regulatory requirements.</p> <p>2.9. In terms of Regulation 34 of the NEMA EIA Regulations, 2014, the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation, the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person (other than the Environmental Assessment Practitioner and Environmental Control Officer) and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014. It is recommended on page 170 of the draft BAR that independent environmental audits be conducted every six months during the construction phase, with one final construction audit at conclusion of construction. The recommended frequency must be included in the relevant section/s of the EMPr. Note that this frequency will be included as a condition should Environmental Authorisation be granted. The applicant must therefore confirm that the recommended frequency can be adhered to, since failure will be deemed as a non-</p>	<p>development is not located within or near a wetland. However, the delineated EFZ edge is associated with the Klein River Estuary and therefore falls within the coastal environment regulated in terms of the Integrated Coastal Management Act and associated estuarine management frameworks. Ground-truthing confirmed that the proposed residential development footprint is located outside of freshwater wetland and riverine systems typically regulated as inland watercourses under NEMA.</p> <p>The amended SDP includes the recommended buffers/no go areas, (see Appendix B4 – Alternative 4; Preferred Site Development Plan).</p> <p>Noted. This section has been updated on the BAR&gt;</p>	
--	---	---	--

	<p>compliance.</p> <p>2.10. Since Activity 19A of Listing Notice 1 is triggered by the proposed development, it is recommended that a Maintenance Management Plan (“MMP”) forms a component of the Environmental Management Programme. Should the Department agree to the proposed MMP, future maintenance work specified within the MMP would not require an Environmental Authorisation prior to the undertaking thereof.</p> <p>2.11. Comment from, but not limited to the following Organs of Statement must be obtained</p> <p>2.11.1. CapeNature        2.11.2. This Department’s Coastal Management Sub-Directorate        2.11.3. BOCMA        2.11.4. Overstrand Municipality        2.11.5. Overberg District Municipality        2.11.6. Department of Agriculture</p> <p>2.12. The Public Participation Process (“PPP”) must comply with the requirements of Regulation 41 of the EIA Regulations 2014, and proof of compliance with all the steps undertaken must be included in the BAR.</p> <p>3. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p> <p>4. Please note that the proposed development may not commence prior to an Environmental Authorisation being granted by the Competent Authority.</p> <p>5. This Directorate reserves the right to revise its comments and request further information from you based on any new or revised information received.</p>	<p>The MMP has been compiled and is attached as Appendix I.</p> <p>See attached comments from Cape Nature, BOCMA, Overstrand Municipality, Overberg District Municipality. However, comments from DEA&amp;DP: CMU and Department of Agriculture are still pending.</p>	
--	--	--	--



**LORNAY**  
ENVIRONMENTAL CONSULTING

**REGISTER FOR INTERESTED AND AFFECTED PARTIES**

**PROJECT:** Ptn 4 of the Farm 643

NAME:	ORGANISATION:	POSTAL ADDRESS:	TEL:	EMAIL:	COMMENT:	DATE & REF:
Chester Arendse	Overstrand Municipality			<a href="mailto:carendse@overstrand.gov.za">carendse@overstrand.gov.za</a>	<p>Your email dated 21st January 2026, please find attached comments from the Overstrand Environmental Management &amp; Conservation Division on the Public Participation Process Application for Farm 643 Portion 4, Stanford.</p> <p>Upon feedback provided from the Department of Environmental Affairs and Development Planning (DEA&amp;DP), additional comments might be provided. With regards to this application, the EM&amp;C does not approve this application yet.</p> <p>A well-drafted report was submitted, and all the aspects were noted. Part of that, the following points were highlighted and noted:</p> <ul style="list-style-type: none"> <li>Specialist studies further support authorization of the development. The botanical specialist confirmed that</li> </ul>	Date: 23/02/26 (Received on the 24th)

					<p>the vegetation on site is of low ecological sensitivity, with no presence of Agulhas Limestone Fynbos or any plant Species of Conservation Concern.</p> <ul style="list-style-type: none"> <li>• Similarly, the faunal specialist determined the Site Ecological Importance to be low, with impacts manageable through appropriate mitigation.</li> <li>• Based on the assessments that were conducted, it is advised that Alternative 3 would be the most suitable option. This option highlights important aspects of avoiding ecologically sensitive areas, and integrates all specialist recommendations, the development can be undertaken in an environmentally responsible manner</li> </ul> <p>It is also noted that the following conditions should apply once authorization is obtained:</p> <ul style="list-style-type: none"> <li>• All essential service infrastructure will be off grid, with water sourced from groundwater under Schedule 1 domestic use, and sewage managed through a closed conservancy tank serviced by the</li> <li>• Overstrand Municipality. Importantly, the residential dwellings, conservancy tanks, and all associated infrastructure will be positioned above the 5 m contour, more than 100 m from the High-Water Mark of the watercourse, and more than 32 m from the Klein Rivier, thereby avoiding flood-prone and ecologically sensitive riparian zones.</li> <li>• Keep developing outside the 50 m no-go buffer surrounding mapped katydid habitat.</li> <li>• Maintain all permanent structures and service infrastructure above the 5 m contour and more than 100 m from the High-Water Mark of the Klein Rivier.</li> <li>• Limit vegetation clearing strictly to the development footprint and retain at least 70% of the property under natural vegetation cover to maintain ecological connectivity.</li> </ul>	
--	--	--	--	--	--	--

					<ul style="list-style-type: none"> <li>• Implement an alien vegetation control programme throughout the property, including long-term monitoring and clearing of invasive species.</li> <li>• Avoid disturbance to mature wild olive trees and other structurally significant indigenous vegetation.</li> <li>• Design and construct the jetties and slipways in a manner that minimizes watercourse disturbance, and ensures no infilling, excavation, or pollution occurs within the river.</li> <li>• Implement all faunal protection measures, including pre-construction walk-throughs, no-go areas, and strict management of construction activities to avoid harm to Species of Conservation Concern.</li> <li>• Use alien clearing and appropriate fire management to preserve a patchy vegetation structure, favouring species sensitive to tall, dense shrub encroachment.</li> <li>• It is also noted that the proposed road to be developed will not be wider than 4m</li> </ul> <p>Farm 643 Portion 4 falls within the Coastal Protection EMOZ and Rural Risk Zones, and under this the following conditions should be adhered to:</p> <ul style="list-style-type: none"> <li>• After construction, any exposed ground area must be stabilized using ground covering plants or mulches to minimize the risk of erosion.</li> <li>• Any new development must be designed and positioned within reason to limit potential flood damage and risk to human life, including but not limited to positioning buildings in suitably acceptable elevated portions of properties.</li> <li>• Planting or harboring of declared alien invasive vegetation on property is prohibited.</li> <li>• Discharge of grey water or domestic effluent within any natural system is prohibited.</li> <li>• No land user within this EMO may utilize the</li> </ul>	
--	--	--	--	--	--	--

					<p>vegetation in a vlei, marsh or within the flood area of watercourse in a manner that may cause deterioration or damage to the natural resources.</p> <ul style="list-style-type: none"> <li>• Disposal of cigarette butts, ash or other hazardous material in any place or manner other than a receptacle designated for such items.</li> </ul> <p>The Municipality reserves the right to revise these comments based on the availability of new information</p>	
Vhengani Ligudu	BOCMA			<p><a href="mailto:VLigudu@bocma.co.za">VLigudu@bocma.co.za</a></p>	<p>RE: THE PROPOSED DEVELOPMENT OF RESIDENTIAL DWELLINGS ON PORTION 4 OF THE FARM 643, CALEDON</p> <p>With reference to the above-mentioned document received by this office on 27/01/2026, requesting comments.</p> <p><u>This office, Breede-Olifants Catchment Management Agency (BOCMA) has reviewed the report and has the following comments:</u></p> <ol style="list-style-type: none"> <li>6. All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered.</li> <li>7. The desktop assessment indicates that the property is located along the Klein River and is mapped as an estuary. Kindly confirm whether any wetlands occur within or near the property.</li> </ol> <p><u>General Conditions:</u></p> <ul style="list-style-type: none"> <li>• The disposal of sewage must at all times comply with the requirements of Sections 22 and 40 of the National Water Act of 1998, (Act 36 of 1998).</li> <li>• In the event of water abstraction from any water resource, the necessary authorisation must be obtained from this office or the Department.</li> <li>• No pollution of surface water or groundwater</li> </ul>	Date: <b>23/02/26</b>

					<p>resources may occur.</p> <ul style="list-style-type: none"> <li>• Stormwater management must be addressed both in terms of flooding, erosion and pollution potential.</li> <li>• No stormwater runoff from any premises containing waste, or water containing waste emanating from industrial activities may be discharged into a water resource. Polluted stormwater must be contained.</li> <li>• Please note that engaging in activity that triggers the National Water Act without authorisation is an offence and will result in the BOCMA taking legal action against the proponent in terms of Section 151 of the National Water Act, 1998 (Act 36 of 1998).</li> </ul> <p>This office reserves the right to revise initial comments and request further information based on any additional information that may be received. The onus remains with the registered property owner to confirm adherence to any other relevant legislation that any activities might trigger and/or need authorization.</p> <p>Please do not hesitate to contact the above official should there be any queries.</p> <p>Yours faithfully</p>	
Rulien Volschenk	Overberg District Municipality			<a href="mailto:rvolschenk@odm.org.za">rvolschenk@odm.org.za</a>	<p>RE: NOTICE OF PUBLIC PARTICIPATION PROCESS PORTION 4 OF THE FARM 643, STANFORD, CALEDON</p> <p>The Environmental Management Services Department of the Overberg District Municipality hereby acknowledges receipt of the Basic Assessment Report for the proposed establishment of two single residential dwellings, manager’s cottage, jetty, slipway, swimming pool, and a fire pit.</p> <p>The Municipality supports the placement if the proposed development behind the Coastal Management Line (CML) and the 5m contour. However, the applicant should take note that</p>	<b>Date:</b> 23/02/26

					<p>the proposed residential dwellings remain located within the designated Rural Risk Zone (RRZ). These regulatory zones play a critical role in guiding appropriate development within coastal areas, ensuring that environmental sensitivities and potential risks are adequately managed. The primary objectives of the coastal management (setback) line include:</p> <ul style="list-style-type: none"> <li>• Protecting costal public property, private asserts, and public safety;</li> <li>• Identifying and conserving features within the coastal protection zone;</li> <li>• Preserving the aesthetic, ecological, and cultural integrity of the costal landscape.</li> </ul> <p>The applicant must ensure that suitable mitigation measures are implemented to safeguard infrastructure against extreme flood events.</p> <p>It is noted that the Botanical specialist concluded that the vegetation type on the property does not constitute Agulhas Limestone Fynbos but rather an undescribed shrubland. The protection of indigenous habitat remains important, and mitigation measures that limit the extent of development and prevent further degradation of the receiving environment should be prioritised. In accordance with the National Environmental Management: Biodiversity Act, 2004, and the Conservation of Agricultural Resources Act, 1983, landowners are responsible for the management and control of invasive species on their properties. An alien vegetation management plan should therefore be developed and implemented for the entire property to avoid further impacts on sensitive ecosystems.</p> <p>The Overberg District Municipality reserves the right to amend these comments or request further information should additional relevant details become available.</p>	
--	--	--	--	--	--	--

					Yours sincerely,	
Rhett Smart	Cape Nature			<a href="mailto:rsmart@capenature.co.za">rsmart@capenature.co.za</a>	<p>Pre-Application Basic Assessment Report for the Proposed Residential Dwellings, Jetty and Slipway on Portion 4 of Farm Middelburg 643, Stanford</p> <p>CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments.</p> <p><b>Desktop Information</b></p> <p>The property is mapped as Critical Biodiversity Area 1 (CBA) in the current official Western Cape Biodiversity Spatial Plan. The vegetation occurring on site is mapped as Agulhas Limestone Fynbos in the National Vegetation Map, which is listed as critically endangered. The property is bordered by the Klein River Estuary and associated estuarine functional zone (EFZ) to the north with no additional aquatic features mapped.</p> <p>The results from the screening tool indicate a very high sensitivity for terrestrial biodiversity and aquatic biodiversity, high sensitivity for animal species and medium sensitivity for plant species. The site sensitivity verification indicates that the terrestrial biodiversity and plant species themes are addressed in the one specialist study and the animal species theme in another specialist study.</p> <p>It is motivated that no specialist study is required for the aquatic biodiversity theme, as only the jetty, slipway, fire pit and swimming pool are located below the 5 m contour within the EFZ. This motivation is not supported, as the Klein River Estuary is a national priority estuary and it will be impacted upon by the jetty and slipway. It is also likely that authorisation will be required in terms of the National Water Act which</p>	<b>23/02/26</b>

					<p>would require input from an aquatic biodiversity specialist.</p> <p>It is necessary to refer to the precedent for the development on the adjacent property to the east, Portion 3 of Farm 643, where there was an application for a main dwelling in 2024. In that case, the application was for the adoption of an ad hoc setback line, as it was determined that the vegetation occurring on site does not fall within an endangered or critically endangered ecosystem, and therefore Listing Notice 3 Activity 12 was not triggered. The only activities which were triggered, as determined, were Listing Notice 1 Activity 17 and Listing Notice 1 Activity 19A for which an ad hoc setback line can be adopted.</p> <p><b>Botanical and Terrestrial Biodiversity Assessment</b></p> <p>The botanical and terrestrial biodiversity assessment was undertaken by the same specialist as for 3/643 referred to above and reference is made to the study on 3/643. In this regard the vegetation on 3/643 was confirmed to not consist of Agulhas Limestone Fynbos based on the species composition and further confirmed by the geology, as the site is not underlain by limestone. It was further motivated that the vegetation had been disturbed by historical agricultural activities and more recently impacted by lack of fire. The assessment states that the same is true for 4/643 and the description for the study on 3/643 is repeated. Species lists are provided of species occurring on both properties and only on the two individual properties.</p> <p>Two main habitat types are described, namely: the floodplain of the Klein River Estuary consisting of reedbeds flanked by buffalo grass (<i>Stenotaphrum secundatum</i>) with isolated shrubs; and mid-high to tall dense shrubland over the remainder of the property with thicket patches. The vegetation is described as moribund and in need of fire for rejuvenation. The conclusion</p>	
--	--	--	--	--	---	--

					<p>is that the vegetation is not Agulhas Limestone Fynbos but an undescribed shrubland and therefore the vegetation can be considered the same as is located on 3/643. The additional species listed for 4/643 mainly consist of disturbance tolerant species including exotic species and listed alien invasive species.</p> <p>Therefore, it is necessary to interrogate why Listing Notice 3 Activity 12 is applicable to this application and not 3/643. In this regard we wish to note that Listing Notice 3 Activity 12 also refers to clearing indigenous vegetation within 100 m of the high water mark of the EFZ in addition to clearing indigenous vegetation within a critically endangered or endangered ecosystem. Listing Notice 3 Activity 12 is therefore relevant to this application regardless of the vegetation classification and should have applied for 3/643, and there is no ad hoc setback line exclusion for this activity. It is possible that the SANBI Red Listed Ecosystem remnants layer was used for the interpretation of the presence of natural habitat, as most of 3/643 is not included but 4/643 is. It would appear that the SANBI remnants layer is based on the Department of Forestry, Fisheries and the Environment (DFFE) land cover data (2018, 2020 and 2022) as the mapping matches up.</p> <p>With regards to 3/643, we wish to note that there was extensive engagement between CapeNature and the project team regarding the classification of the vegetation type, including a site visit. There was also engagement between the environmental assessment practitioner and SANBI. We maintain our stance as previously that the vegetation occurring on site should be aligned to an existing vegetation type or otherwise would need to be recognised by SANBI as a new vegetation type. Should the interpretation be that secondary vegetation that arises after disturbance which is not representative of the original critically endangered or endangered vegetation type prior to disturbance be interpreted as not triggering Listing</p>	
--	--	--	--	--	---	--

					<p>Notice 3 Activity 12, this must be officially accepted and applied and would need to be more clearly defined in order to qualify. It is however acknowledged that secondary vegetation such as that occurring on site is of significantly lower biodiversity value from a botanical perspective than the original vegetation type. In this case the original vegetation type would not have been Agulhas Limestone Fynbos in any case as was agreed by both botanists, but possibly Western Rûens Shale Renosterveld.</p> <p>With regards to the historical disturbance, the 3&amp;4/643 were not cultivated in a long period of time based on the evidence from historical aerial imagery. There is no evidence of cultivation during the extent of historical Google Earth imagery extending back to 2003, despite that the sites were mapped as cultivated with lucerne/medics in the 2013 Department of Agriculture crop census. Older imagery from the National Geospatial Information (NGI) portal indicates that the sites were cultivated in 1976 with vegetation re-establishing in the 1989 imagery.</p> <p>The site ecological importance (SEI) is calculated, although there were no Species of Conservation Concern (SCCs) identified. Three alternative layouts were presented with the first proposed layout of the dwelling encroaching into the EFZ and the other two layouts (including project preferred alternative) staying out of the EFZ apart from the structures mentioned above. The residual impact after mitigation is rated as medium for the first layout and low for the other two layouts. The mitigation measures include standard mitigation which is supported.</p> <p>We wish to note that there are records of plant SCCs on iNaturalist, despite the statement in the botanical assessment that there are no other records for the site other than those from the botanical study. We therefore recommend that these</p>	
--	--	--	--	--	---	--

					<p>records need to be reviewed and the report amended as required.</p> <p><b>Terrestrial Animal Species Assessment</b></p> <p>The terrestrial animal species assessment identified five faunal habitats on the site, namely Phragmites reedbeds, Kikuyu grass, dense shrubland fynbos, open shrubland fynbos and Eucalyptus stands. We wish to note that the botanist did not record alien invasive Kikuyu grass (previously <i>Pennisetum clandestinum</i>, now <i>Cenchrus clandestinus</i>) but did record buffalo grass (<i>Stenotaphrum secundatum</i>) and couch/kweek grass (<i>Cynodon dactylon</i>).</p> <p>An extensive species list is provided of the species recorded on site during the three diurnal and nocturnal field site visits in August and within the five habitats encompassing mammals, birds, reptiles, amphibians and invertebrates. A total of 11 SCCs were recorded. Bontebok (<i>Damaliscus pygargus pygargus</i>) is listed as vulnerable however they were introduced to the property. The site is however within the natural distribution range of the species (Cowell &amp; Birss 2017). We are aware that there was a captivity permit for bontebok on 3/643 and wish to query if they are the same animals. The list of five additional SCCs considered likely to occur on site in addition to those flagged in the screening tool includes four species which are included in the list of species recorded, therefore it should be one additional species.</p> <p>The assessment includes determination of the SEI and an assessment of the impact of the development on the SCCs flagged in the screening tool, recorded on site and predicted to occur. The SEI is rated as high for Black Harrier (<i>Circus maurus</i>), southern adder (<i>Bitis armata</i>) and mute winter katydid (<i>Brinkiella aptera</i>). Targeted surveys of the mute winter katydid were undertaken with a total of 43 individuals recorded and</p>	
--	--	--	--	--	--	--

					<p>the key habitats on site were mapped. A 50 m high sensitivity buffer zone was designated from the identified habitat. The preferred layout was designed based on the avoidance of this buffer zone for the second dwelling.</p> <p>It is noted that the 10 SCCs restricted to the estuarine habitat are rated as low SEI, as the proposed development is located outside of the EFZ. The African Marsh Harrier (<i>Circus ranivorus</i>) which was observed utilizing the reedbed habitat is however rated as medium SEI.</p> <p>Impact assessment tables are provided for each species as well as faunal connectivity. The residual impact for Black Harrier and faunal connectivity can be reduced to low-medium and for the other impacts low or less. A number of mitigation measures are listed, all of which must be considered as essential mitigation and included within the Environmental Management Programme (EMPr). Key mitigation measures worth noting include conserving the property through a stewardship agreement or similar, reducing the number of jetties from two to one and maintaining a buffer from the reed margins and estuary edges.</p> <p>We wish to note that it is proposed by members of the Stanford community to encourage all landowners downstream of Stanford to clear their properties of reeds as a flood risk mitigation measure. CapeNature has concerns regarding the ecological impacts of this action as the reedbeds are important faunal habitat e.g. African Marsh Harrier. Although not part of the application, we recommend that the faunal specialist should provide input on this proposal and it should be included as a required mitigation measure/restriction for consideration for authorisation.</p> <p>We wish to note that the outcome from the animal species assessment provides evidence that even if the plant species</p>	
--	--	--	--	--	--	--

				<p>diversity of a property containing mature secondary vegetation is low, it can still provide important faunal habitat. It is further noted that specialist studies and application of the screening tool is not required for ad hoc setback line applications.</p> <p><b>Coastal Setback, Jetty and Slipway</b></p> <p>The primary buildings associated with the proposed development are located outside of the EFZ and therefore also behind the coastal management line. The proposed development is however located within the coastal protection zone and therefore the regulations for the Coastal Protection Zone Environmental Management Overlay Zone (EMOZ) of the Overstrand Municipality must be adhered to. The Klein River Estuarine Management Plan must also be adhered to.</p> <p>As noted above, the current preferred layout has reduced the number of jetties from two – one for each dwelling - to a single jetty. CapeNature has a draft policy which is used in evaluating applications for jetties in terms of the Sea Shore Act and for NEMA applications. Sea Shore Leases are only issued once environmental authorisation is obtained. The policy states a maximum of one jetty per dwelling, however ideally it is preferred to only have one jetty per property therefore the reduction to a single jetty is supported. The other specifications in the CapeNature policy should also be adhered to.</p> <p>CapeNature does not support private slipways. Slipways have a more significant impact on the estuary banks than jetties in terms of a hard structure which can increase erosion and alter flow. In the case of the current property, it is located within close proximity (<math>\pm 2</math> km) to the public slipway in Stanford which can be used to launch boats. CapeNature therefore objects to the proposed slipway. We further recommend that the Department of Environmental Affairs and Development</p>	
--	--	--	--	--	--

					<p>Planning (DEA&amp;DP) Coastal Management component should provide comment on the proposed jetty and slipway.</p> <p>The proposed jetty and slipway must be assessed in the aquatic biodiversity specialist study which we recommended above. It must be ensured that the location of the proposed jetty will have minimal impact on the hydrology and ecological function of the system. The specialist should ideally have expertise in estuarine systems. The potential impact of reed clearing should also be assessed in the aquatic biodiversity study.</p> <p><b>Conclusion</b></p> <p>In conclusion, an aquatic biodiversity specialist study must be undertaken to assess the impact of the proposed jetty and slipway on the Klein River Estuary and associated habitats before the application is considered further. CapeNature does not support private slipways, especially when there is a public slipway in close proximity that can be used. We are satisfied that the impacts on terrestrial biodiversity have been adequately addressed, however queries raised above must be responded to and confirmation provided regarding implementation of the proposed mitigation measures.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	
Ntanganedzeni Mabasa	DEADP: Development Management			<a href="mailto:Ntanganedzeni.Mabasa@westerncape.gov.za">Ntanganedzeni.Mabasa@westerncape.gov.za</a>	COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (“BAR”) IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (“NEMA”), 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT (“EIA”) REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 4 OF FARM NO. 643, STANFORD	

					<p>3. The electronic copy of the draft BAR, as received by the Directorate: Development Management (“this Directorate”) on 21 January 2026, and the Directorate’s acknowledgement thereof issued on 29 January 2026, refer.</p> <p>4. This Directorate’s comment is as follows:</p> <p>7.1. According to the latest google earth imagery, potential vegetation clearance may have been undertaken along the boundary of the site bordering the river/estuary, as well as an area next to the development footprint designated for the manager’s cottage. This may constitute unlawful commencement of a listed activity. Clarity must be provided in this regard.</p> <p>7.2. The Terrestrial Animal Site Sensitivity Verification and Species Specialist Assessment Report dated December 2025, compiled by Wildlife Conservation Decision Support includes a recommendation that consideration should be given to assign all retained natural habitat (approximately 70% of site) to a formal conservation status, such as a stewardship agreement, to ensure long-term ecological management, and to secure long-term management of estuary-edge natural habitat through stewardship or conservation agreements. Since it is stated that the development is deemed acceptable under strict conditions, including the long-term ecological management of undeveloped areas, confirmation is required whether these specialist recommendations will be implemented. In addition, comment must be obtained from CapeNature whether the recommendations are supported.</p> <p>7.3. The Terrestrial Biodiversity Impact Assessment dated October 2025, compiled by Bergwind Botanical Surveys cc concluded that the vegetation present on the site is not representative of mapped critically</p>	
--	--	--	--	--	---	--

					<p>endangered Agulhas Limestone Fynbos and that the Critical Biodiversity Area mapping in terms of the 2024 Western Cape Biodiversity Spatial Plan (“WCBSA”) is incorrect.</p> <p>CapeNature has developed a WCBSA verification protocol. Only CapeNature can provide official confirmation whether a change in the mapping is warranted or not. Furthermore, there is a formal process that must be followed to obtain this confirmation. Unless the required confirmation is obtained, the mapping must be considered and remains applicable. In addition, comment must be obtained from CapeNature regarding the Terrestrial Biodiversity Impact Assessment findings.</p> <p>7.4. As stated in the correspondence dated 22 April 2025, this Directorate reiterates that given the development’s proximity to the Kleinrivier Estuary additional specialist input may be required. Especially given that the proposed development footprint is within the coastal protection zone, which is generally not supported. Hence, should any authority that has jurisdiction in respect of any aspect of the proposed development request that further specialist studies be conducted, and where the request is supported by this Directorate, this must take precedence (i.e. comment from this Department’s Coastal Management Sub-Directorate, CapeNature and the local and district municipality).</p> <p>7.5. Written confirmation must be obtained from a registered service provider that they have available capacity to regularly empty the conservancy tank and written confirmation is required from the municipality of sufficient capacity at the Wastewater Treatment Works to service the proposed development.</p>	
--	--	--	--	--	---	--

					<p>7.6. Similarly, written confirmation must be obtained from a registered service provider that they have available capacity to provide the required solid waste removal services and the municipality must confirm that there is sufficient capacity at the landfill site to service the proposed development.</p> <p>7.7. Confirmation is required from the Breede-Olifants Catchment Management Agency (“BOCMA”) whether the proposed development triggers any water uses that will require approval in terms of the National Water Act, 1998 (Act No. 36 of 1998) (“NWA”). If a Water Use Licence Application (“WULA”) is required, proof of submission of the application to the BOCMA and a copy of the WULA Information must be included in the BAR.</p> <p>7.8. The Site Development Plan (“SDP”) of the preferred alternative must include any buffer / no-go areas that will be incorporated, as recommended by the specialist findings, especially if is the remainder of the site will be conserved. The updated SDP must also be included the Environmental Management Programme (“EMPr”), as per regulatory requirements.</p> <p>7.9. 9 In terms of Regulation 34 of the NEMA EIA Regulations, 2014, the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation, the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person (other than the Environmental Assessment Practitioner and Environmental Control Officer) and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014. It is recommended on page 170 of the draft BAR that independent environmental audits be conducted every six months during the construction phase, with</p>	
--	--	--	--	--	--	--

					<p>one final construction audit at conclusion of construction. The recommended frequency must be included in the relevant section/s of the EMPr. Note that this frequency will be included as a condition should Environmental Authorisation be granted. The applicant must therefore confirm that the recommended frequency can be adhered to, since failure will be deemed as a non-compliance.</p> <p>7.10. Since Activity 19A of Listing Notice 1 is triggered by the proposed development, it is recommended that a Maintenance Management Plan (“MMP”) forms a component of the Environmental Management Programme. Should the Department agree to the proposed MMP, future maintenance work specified within the MMP would not require an Environmental Authorisation prior to the undertaking thereof.</p> <p>7.11. Comment from, but not limited to the following Organs of Statement must be obtained</p> <p>7.11.1. CapeNature          7.11.2. This Department’s Coastal Management Sub-Directorate          7.11.3. BOCMA          7.11.4. Overstrand Municipality          7.11.5. Overberg District Municipality          7.11.6. Department of Agriculture</p> <p>7.12. The Public Participation Process (“PPP”) must comply with the requirements of Regulation 41 of the EIA Regulations 2014, and proof of compliance with all the steps undertaken must be included in the BAR.</p> <p>8. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p>	
--	--	--	--	--	--	--

---

					<p>9. Please note that the proposed development may not commence prior to an Environmental Authorisation being granted by the Competent Authority.</p> <p>This Directorate reserves the right to revise its comments and request further information from you based on any new or revised information received.</p>	
--	--	--	--	--	---	--

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



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

NAVRAE | ENQUIRIES : CHESTER ARENDSE | 028 384 8320  
DATE | DATUM : 23 FEBRUARY 2026

Dear Michelle Naylor  
LORNAY ENVIRONMENTAL CONSULTING  
Hemel & Aarde Wine Village – Unit 5/1F  
PO Box 1990, Hermanus, 7200, South Africa  
T +27 (0) 83 245 6556  
E [michelle@lornay.co.za](mailto:michelle@lornay.co.za) | W [www.lornay.co.za](http://www.lornay.co.za)

**RE: Notice of Public Participation | Farm 643 Portion 4, Stanford**

Your email dated 21<sup>st</sup> January 2026, please find attached comments from the Overstrand Environmental Management & Conservation Division on the Public Participation Process Application for Farm 643 Portion 4, Stanford.

Upon feedback provided from the Department of Environmental Affairs and Development Planning (DEA&DP), additional comments might be provided. With regards to this application, the EM&C does not approve this application yet.

A well-drafted report was submitted, and all the aspects were noted. Part of that, the following points were highlighted and noted:

- Specialist studies further support authorization of the development. The botanical specialist confirmed that the vegetation on site is of low ecological sensitivity, with no presence of Agulhas Limestone Fynbos or any plant Species of Conservation Concern.
- Similarly, the faunal specialist determined the Site Ecological Importance to be low, with impacts manageable through appropriate mitigation.
- Based on the assessments that were conducted, it is advised that Alternative 3 would be the most suitable option. This option highlights important aspects of avoiding ecologically sensitive areas, and integrates all specialist recommendations, the development can be undertaken in an environmentally responsible manner.

It is also noted that the following conditions should apply once authorization is obtained:

- All essential service infrastructure will be off grid, with water sourced from groundwater under Schedule 1 domestic use, and sewage managed through a closed conservancy tank serviced by the Overstrand Municipality. Importantly, the residential dwellings, conservancy tanks, and all associated infrastructure will be positioned above the 5 m contour, more than 100 m from the High-Water Mark of the watercourse, and more than 32 m from the Klein Rivier, thereby avoiding flood-prone and ecologically sensitive riparian zones.
- Keep developing outside the 50 m no-go buffer surrounding mapped katydid habitat.
- Maintain all permanent structures and service infrastructure above the 5 m contour and more than 100 m from the High-Water Mark of the Klein Rivier.
- Limit vegetation clearing strictly to the development footprint and retain at least 70% of the property under natural vegetation cover to maintain ecological connectivity.

Tel.: 028 384 8320  
E-mail: [carendse@overstrand.gov.za](mailto:carendse@overstrand.gov.za)  
72 Main Road GANSBAAI | 7220

- Implement an alien vegetation control programme throughout the property, including long-term monitoring and clearing of invasive species.
- Avoid disturbance to mature wild olive trees and other structurally significant indigenous vegetation.
- Design and construct the jetties and slipways in a manner that minimizes watercourse disturbance, and ensures no infilling, excavation, or pollution occurs within the river.
- Implement all faunal protection measures, including pre-construction walk-throughs, no-go areas, and strict management of construction activities to avoid harm to Species of Conservation Concern.
- Use alien clearing and appropriate fire management to preserve a patchy vegetation structure, favoring species sensitive to tall, dense shrub encroachment.
- It is also noted that the proposed road to be developed will not be wider than 4m.

Farm 643 Portion 4 falls within the Coastal Protection EMOZ and Rural Risk Zones, and under this the following conditions should be adhered to:

- After construction, any exposed ground area must be stabilized using ground covering plants or mulches to minimize the risk of erosion.
- Any new development must be designed and positioned within reason to limit potential flood damage and risk to human life, including but not limited to positioning buildings in suitably acceptable elevated portions of properties.
- Planting or harboring of declared alien invasive vegetation on property is prohibited.
- Discharge of grey water or domestic effluent within any natural system is prohibited.
- No land user within this EMO may utilize the vegetation in a vlei, marsh or within the flood area of watercourse in a manner that may cause deterioration or damage to the natural resources.
- Disposal of cigarette butts, ash or other hazardous material in any place or manner other than a receptacle designated for such items.

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

Regards



**Chester Arendse**

Assistant Environmental Officer  
Environmental Management & Conservation Division  
Overstrand Municipality

T: +27 (0) 28 384 8320 |

E: [carendse@overstrand.gov.za](mailto:carendse@overstrand.gov.za)

Tel.: 028 384 8320

E-mail: [carendse@overstrand.gov.za](mailto:carendse@overstrand.gov.za)

72 Main Road GANSBAAI | 7220



**BREEDDE-OLIFANTS**  
CATCHMENT MANAGEMENT AGENCY

T. 023 346 8000

E. [info@bocma.co.za](mailto:info@bocma.co.za)

A. Corner Mountain Mill & Eastlake Road.  
Worcester, Western Cape.  
South Africa 6850

W. [www.breeddegouritzcma.co.za](http://www.breeddegouritzcma.co.za)

Enquiries: V Ligudu  
Ref: 4/10/2/G40L/FARM 643/4, CALEDON  
Date: 23/02/2026

**LORNAY ENVIRONMENTAL CONSULTING**

Unit 5/1F  
Hemel & Aarde Wine Village  
Hermanus  
7200

Attention: Michelle Naylor

**RE: THE PROPOSED DEVELOPMENT OF RESIDENTIAL DWELLINGS ON PORTION 4 OF THE FARM 643, CALEDON**

With reference to the above-mentioned document received by this office on **27/01/2026**, requesting comments.

This office, Breedde-Olifants Catchment Management Agency (BOCMA) has reviewed the report and has the following comments:

1. All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered.
2. The desktop assessment indicates that the property is located along the Klein River and is mapped as an estuary. Kindly confirm whether any wetlands occur within or near the property.

**General Conditions:**

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



**BREED-OLIFANTS**  
CATCHMENT MANAGEMENT AGENCY

A. Corner Mountain Mill & Eastlake Road.  
Worcester, Western Cape.  
South Africa 6850

T. 023 346 8000

E. [info@bocma.co.za](mailto:info@bocma.co.za)

W. [www.breedegouritzcma.co.za](http://www.breedegouritzcma.co.za)

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

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

Yours faithfully

*Liquduwc*

**MR JAN VAN STADEN**

**CHIEF EXECUTIVE OFFICER (Acting)**



# OVERBERG

DISTRIKSMUNISIPALITEIT  
DISTRICT MUNICIPALITY  
UMASIPALA WESITHILI



*MELD ASB/PLEASE QUOTE*

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

*Navrae/Enquiries:* Francois Kotze

*Bylyn/Ext.:*

Privaatsak: X22

Private Bag:  
BREDASDORP  
7280

Tel: (028) 4251157

Faks/Fax: (028) 4251014

E-mail/E-pos: [rvolschenk@odm.org.za](mailto:rvolschenk@odm.org.za)

23 February 2026

## LORNAY ENVIRONMENTAL CONSULTING

P.O Box 1990  
HERMANUS  
7200

For attention: Michelle Naylor

### RE: NOTICE OF PUBLIC PARTICIPATION PROCESS PORTION 4 OF THE FARM 643, STANFORD, CALEDON

The Environmental Management Services Department of the Overberg District Municipality hereby acknowledges receipt of the Basic Assessment Report for the proposed establishment of two single residential dwellings, a manager's cottage, jetty, slipway, swimming pool, and fire pit.

The Municipality supports the placement of the proposed development behind both the Coastal Management Line (CML) and the 5 m contour. However, the applicant should take note that the proposed residential dwellings remain located within the designated Rural Risk Zone (RRZ). These regulatory zones play a critical role in guiding appropriate development within coastal areas, ensuring that environmental sensitivities and potential risks are adequately managed. The primary objectives of the coastal management (setback) line include:

- Protecting coastal public property, private assets, and public safety;
- Identifying and conserving features within the coastal protection zone;
- Preserving the aesthetic, ecological, and cultural integrity of the coastal landscape.

The applicant must ensure that suitable mitigation measures are implemented to safeguard infrastructure against extreme flood events.

It is noted that the Botanical Specialist concluded that the vegetation type on the property does not constitute Agulhas Limestone Fynbos but rather an undescribed shrubland. The protection of indigenous habitat remains important, and mitigation measures that limit the extent of development and prevent further degradation of the receiving environment should be prioritised. In accordance with the National Environmental Management: Biodiversity Act, 2004, and the Conservation of Agricultural Resources Act, 1983, landowners are responsible for the

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

management and control of invasive species on their properties. An alien vegetation management plan should therefore be developed and implemented for the entire property to avoid further impacts on sensitive ecosystems.

The Overberg District Municipality reserves the right to amend these comments or request further information should additional relevant details become available.

Yours sincerely



**R. BOSMAN**  
**MUNICIPAL MANAGER**



**CONSERVATION INTELLIGENCE: SOUTH**

postal 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
physical 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
website [www.capenature.co.za](http://www.capenature.co.za)  
enquiries Rhett Smart  
telephone 087 087 8017  
email [rsmart@capenature.co.za](mailto:rsmart@capenature.co.za)  
reference LS14/2/6/1/7/2/643-4\_residential\_Stanford  
date 23 February 2026

Lornay Environmental Consulting  
P.O. Box 1990  
Hermanus  
7200

Attention: Michelle Naylor  
By email: [michelle@lornay.co.za](mailto:michelle@lornay.co.za)

Dear Ms Naylor

**Pre-Application Basic Assessment Report for the Proposed Residential Dwellings, Jetty and Slipway on Portion 4 of Farm Middelburg 643, Stanford**

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments.

**Desktop Information**

The property is mapped as Critical Biodiversity Area I (CBA) in the current official Western Cape Biodiversity Spatial Plan. The vegetation occurring on site is mapped as Agulhas Limestone Fynbos in the National Vegetation Map, which is listed as critically endangered. The property is bordered by the Klein River Estuary and associated estuarine functional zone (EFZ) to the north with no additional aquatic features mapped.

The results from the screening tool indicate a very high sensitivity for terrestrial biodiversity and aquatic biodiversity, high sensitivity for animal species and medium sensitivity for plant species. The site sensitivity verification indicates that the terrestrial biodiversity and plant species themes are addressed in the one specialist study and the animal species theme in another specialist study.

It is motivated that no specialist study is required for the aquatic biodiversity theme, as only the jetty, slipway, fire pit and swimming pool are located below the 5 m contour within the EFZ. This motivation is not supported, as the Klein River Estuary is a national priority estuary and it will be impacted upon by the jetty and slipway. It is also likely that authorisation will be required in terms of the National Water Act which would require input from an aquatic biodiversity specialist.

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

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mwandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

It is necessary to refer to the precedent for the development on the adjacent property to the east, Portion 3 of Farm 643, where there was an application for a main dwelling in 2024. In that case, the application was for the adoption of an *ad hoc* setback line, as it was determined that the vegetation occurring on site does not fall within an endangered or critically endangered ecosystem, and therefore Listing Notice 3 Activity 12 was not triggered. The only activities which were triggered, as determined, were Listing Notice 1 Activity 17 and Listing Notice 1 Activity 19A for which an *ad hoc* setback line can be adopted.

### **Botanical and Terrestrial Biodiversity Assessment**

The botanical and terrestrial biodiversity assessment was undertaken by the same specialist as for 3/643 referred to above and reference is made to the study on 3/643. In this regard the vegetation on 3/643 was confirmed to not consist of Agulhas Limestone Fynbos based on the species composition and further confirmed by the geology, as the site is not underlain by limestone. It was further motivated that the vegetation had been disturbed by historical agricultural activities and more recently impacted by lack of fire. The assessment states that the same is true for 4/643 and the description for the study on 3/643 is repeated. Species lists are provided of species occurring on both properties and only on the two individual properties.

Two main habitat types are described, namely: the floodplain of the Klein River Estuary consisting of reedbeds flanked by buffalo grass (*Stenotaphrum secundatum*) with isolated shrubs; and mid-high to tall dense shrubland over the remainder of the property with thicket patches. The vegetation is described as moribund and in need of fire for rejuvenation. The conclusion is that the vegetation is not Agulhas Limestone Fynbos but an undescribed shrubland and therefore the vegetation can be considered the same as is located on 3/643. The additional species listed for 4/643 mainly consist of disturbance tolerant species including exotic species and listed alien invasive species.

Therefore, it is necessary to interrogate why Listing Notice 3 Activity 12 is applicable to this application and not 3/643. In this regard we wish to note that Listing Notice 3 Activity 12 also refers to clearing indigenous vegetation within 100 m of the high water mark of the EFZ in addition to clearing indigenous vegetation within a critically endangered or endangered ecosystem. Listing Notice 3 Activity 12 is therefore relevant to this application regardless of the vegetation classification and should have applied for 3/643, and there is no *ad hoc* setback line exclusion for this activity. It is possible that the SANBI Red Listed Ecosystem remnants layer was used for the interpretation of the presence of natural habitat, as most of 3/643 is not included but 4/643 is. It would appear that the SANBI remnants layer is based on the Department of Forestry, Fisheries and the Environment (DFFE) land cover data (2018, 2020 and 2022) as the mapping matches up.

With regards to 3/643, we wish to note that there was extensive engagement between CapeNature and the project team regarding the classification of the vegetation type, including a site visit. There was also engagement between the environmental assessment practitioner and SANBI. We maintain our stance as previously that the vegetation occurring on site should be aligned to an existing vegetation type or otherwise would need to be recognised by SANBI as a new vegetation type. Should

the interpretation be that secondary vegetation that arises after disturbance which is not representative of the original critically endangered or endangered vegetation type prior to disturbance be interpreted as not triggering Listing Notice 3 Activity 12, this must be officially accepted and applied and would need to be more clearly defined in order to qualify. It is however acknowledged that secondary vegetation such as that occurring on site is of significantly lower biodiversity value from a botanical perspective than the original vegetation type. In this case the original vegetation type would not have been Agulhas Limestone Fynbos in any case as was agreed by both botanists, but possibly Western Rûens Shale Renosterveld.

With regards to the historical disturbance, the 3&4/643 were not cultivated in a long period of time based on the evidence from historical aerial imagery. There is no evidence of cultivation during the extent of historical Google Earth imagery extending back to 2003, despite that the sites were mapped as cultivated with lucerne/medics in the 2013 Department of Agriculture crop census. Older imagery from the National Geospatial Information (NGI) portal indicates that the sites were cultivated in 1976 with vegetation re-establishing in the 1989 imagery.

The site ecological importance (SEI) is calculated, although there were no Species of Conservation Concern (SCCs) identified. Three alternative layouts were presented with the first proposed layout of the dwelling encroaching into the EFZ and the other two layouts (including project preferred alternative) staying out of the EFZ apart from the structures mentioned above. The residual impact after mitigation is rated as medium for the first layout and low for the other two layouts. The mitigation measures include standard mitigation which is supported.

We wish to note that there are records of plant SCCs on iNaturalist, despite the statement in the botanical assessment that there are no other records for the site other than those from the botanical study. We therefore recommend that these records need to be reviewed and the report amended as required.

### **Terrestrial Animal Species Assessment**

The terrestrial animal species assessment identified five faunal habitats on the site, namely *Phragmites* reedbeds, Kikuyu grass, dense shrubland fynbos, open shrubland fynbos and *Eucalyptus* stands. We wish to note that the botanist did not record alien invasive Kikuyu grass (previously *Pennisetum clandestinum*, now *Cenchrus clandestinus*) but did record buffalo grass (*Stenotaphrum secundatum*) and couch/kweek grass (*Cynodon dactylon*).

An extensive species list is provided of the species recorded on site during the three diurnal and nocturnal field site visits in August and within the five habitats encompassing mammals, birds, reptiles, amphibians and invertebrates. A total of 11 SCCs were recorded. Bontebok (*Damaliscus pygargus pygargus*) is listed as vulnerable however they were introduced to the property. The site is however within the natural distribution range of the species (Cowell & Birss 2017). We are aware that there was a captivity permit for bontebok on 3/643 and wish to query if they are the same animals. The list

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

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

of five additional SCCs considered likely to occur on site in addition to those flagged in the screening tool includes four species which are included in the list of species recorded, therefore it should be one additional species.

The assessment includes determination of the SEI and an assessment of the impact of the development on the SCCs flagged in the screening tool, recorded on site and predicted to occur. The SEI is rated as high for Black Harrier (*Circus maurus*), southern adder (*Bitis armata*) and mute winter katydid (*Brinkiella aptera*). Targeted surveys of the mute winter katydid were undertaken with a total of 43 individuals recorded and the key habitats on site were mapped. A 50 m high sensitivity buffer zone was designated from the identified habitat. The preferred layout was designed based on the avoidance of this buffer zone for the second dwelling.

It is noted that the 10 SCCs restricted to the estuarine habitat are rated as low SEI, as the proposed development is located outside of the EFZ. The African Marsh Harrier (*Circus ranivorus*) which was observed utilizing the reedbed habitat is however rated as medium SEI.

Impact assessment tables are provided for each species as well as faunal connectivity. The residual impact for Black Harrier and faunal connectivity can be reduced to low-medium and for the other impacts low or less. A number of mitigation measures are listed, all of which must be considered as essential mitigation and included within the Environmental Management Programme (EMPr). Key mitigation measures worth noting include conserving the property through a stewardship agreement or similar, reducing the number of jetties from two to one and maintaining a buffer from the reed margins and estuary edges.

We wish to note that it is proposed by members of the Stanford community to encourage all landowners downstream of Stanford to clear their properties of reeds as a flood risk mitigation measure. CapeNature has concerns regarding the ecological impacts of this action as the reedbeds are important faunal habitat e.g. African Marsh Harrier. Although not part of the application, we recommend that the faunal specialist should provide input on this proposal and it should be included as a required mitigation measure/restriction for consideration for authorisation.

We wish to note that the outcome from the animal species assessment provides evidence that even if the plant species diversity of a property containing mature secondary vegetation is low, it can still provide important faunal habitat. It is further noted that specialist studies and application of the screening tool is not required for *ad hoc* setback line applications.

### **Coastal Setback, Jetty and Slipway**

The primary buildings associated with the proposed development are located outside of the EFZ and therefore also behind the coastal management line. The proposed development is however located within the coastal protection zone and therefore the regulations for the Coastal Protection Zone Environmental Management Overlay Zone (EMOZ) of the Overstrand Municipality must be adhered to. The Klein River Estuarine Management Plan must also be adhered to.

As noted above, the current preferred layout has reduced the number of jetties from two – one for each dwelling - to a single jetty. CapeNature has a draft policy which is used in evaluating applications for jetties in terms of the Sea Shore Act and for NEMA applications. Sea Shore Leases are only issued once environmental authorisation is obtained. The policy states a maximum of one jetty per dwelling, however ideally it is preferred to only have one jetty per property therefore the reduction to a single jetty is supported. The other specifications in the CapeNature policy should also be adhered to.

CapeNature does not support private slipways. Slipways have a more significant impact on the estuary banks than jetties in terms of a hard structure which can increase erosion and alter flow. In the case of the current property, it is located within close proximity ( $\pm 2$  km) to the public slipway in Stanford which can be used to launch boats. CapeNature therefore objects to the proposed slipway. We further recommend that the Department of Environmental Affairs and Development Planning (DEA&DP) Coastal Management component should provide comment on the proposed jetty and slipway.

The proposed jetty and slipway must be assessed in the aquatic biodiversity specialist study which we recommended above. It must be ensured that the location of the proposed jetty will have minimal impact on the hydrology and ecological function of the system. The specialist should ideally have expertise in estuarine systems. The potential impact of reed clearing should also be assessed in the aquatic biodiversity study.

### **Conclusion**

In conclusion, an aquatic biodiversity specialist study must be undertaken to assess the impact of the proposed jetty and slipway on the Klein River Estuary and associated habitats before the application is considered further. CapeNature does not support private slipways, especially when there is a public slipway in close proximity that can be used. We are satisfied that the impacts on terrestrial biodiversity have been adequately addressed, however queries raised above must be responded to and confirmation provided regarding implementation of the proposed mitigation measures.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Regards

**Rhett  
Smart**  Digitally signed  
by Rhett Smart  
Date: 2026.02.23  
18:07:10 +02'00'

Rhett Smart

For: Manager: Landscape Conservation Intelligence South

cc. Rowena Crowe, CapeNature

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

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

References:

Cowell, C.R. and Birss, C. 2017. Biodiversity Management Plan for The Bontebok (*Damaliscus pygargus*) in South Africa. Unpublished Report, jointly developed by South African National Parks, CapeNature and the National Department of Environmental Affairs. Version 1.0



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

**REFERENCE:** 16/3/3/6/7/1/E2/37/1155/25

**DATE:** 23 February 2026

The Board of Directors  
Cheddles (Pty) Ltd  
6 Frere Road  
**SEA POINT**  
8000

**Attention: Mr. Hedley Gerhard**

Cell: 072 778 6392  
Email: hedleyg@gmail.com

Dear Sir

**COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT ("BAR") IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT ("NEMA"), 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 4 OF FARM NO. 643, STANFORD.**

1. The electronic copy of the draft BAR, as received by the Directorate: Development Management ("this Directorate") on 21 January 2026, and the Directorate's acknowledgement thereof issued on 29 January 2026, refer.
2. This Directorate's comment is as follows:
  - 2.1 According to the latest google earth imagery, potential vegetation clearance may have been undertaken along the boundary of the site bordering the river/estuary, as well as an area next to the development footprint designated for the manager's cottage. This may constitute unlawful commencement of a listed activity. Clarity must be provided in this regard.
  - 2.2 The Terrestrial Animal Site Sensitivity Verification and Species Specialist Assessment Report dated December 2025, compiled by Wildlife Conservation Decision Support includes a recommendation that consideration should be given to assign all retained natural habitat (approximately 70% of site) to a formal conservation status, such as a stewardship agreement, to ensure long-term ecological management, and to secure long-term management of estuary-edge natural habitat through stewardship or conservation agreements. Since it is stated that the development is deemed acceptable under strict conditions, including the long-term ecological management of undeveloped areas, confirmation is required whether these specialist recommendations will be implemented. In addition, comment must be obtained from CapeNature whether the recommendations are supported.
  - 2.3 The Terrestrial Biodiversity Impact Assessment dated October 2025, compiled by Bergwind Botanical Surveys cc concluded that the vegetation present on the site is not representative of mapped

critically endangered Agulhas Limestone Fynbos and that the Critical Biodiversity Area mapping in terms of the 2024 Western Cape Biodiversity Spatial Plan ("WC BSP") is incorrect.

CapeNature has developed a WC BSP verification protocol. Only CapeNature can provide official confirmation whether a change in the mapping is warranted or not. Furthermore, there is a formal process that must be followed to obtain this confirmation. Unless the required confirmation is obtained, the mapping must be considered and remains applicable. In addition, comment must be obtained from CapeNature regarding the Terrestrial Biodiversity Impact Assessment findings.

- 2.4 As stated in the correspondence dated 22 April 2025, this Directorate reiterates that given the development's proximity to the Kleinrivier Estuary additional specialist input may be required. Especially given that the proposed development footprint is within the coastal protection zone, which is generally not supported. Hence, should any authority that has jurisdiction in respect of any aspect of the proposed development request that further specialist studies be conducted, and where the request is supported by this Directorate, this must take precedence (i.e. comment from this Department's Coastal Management Sub-Directorate, CapeNature and the local and district municipality).
- 2.5 Written confirmation must be obtained from a registered service provider that they have available capacity to regularly empty the conservancy tank and written confirmation is required from the municipality of sufficient capacity at the Wastewater Treatment Works to service the proposed development.
- 2.6 Similarly, written confirmation must be obtained from a registered service provider that they have available capacity to provide the required solid waste removal services and the municipality must confirm that there is sufficient capacity at the landfill site to service the proposed development.
- 2.7 Confirmation is required from the Breede-Olifants Catchment Management Agency ("BOCMA") whether the proposed development triggers any water uses that will require approval in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If a Water Use Licence Application ("WULA") is required, proof of submission of the application to the BOCMA and a copy of the WULA Information must be included in the BAR.
- 2.8 The Site Development Plan ("SDP") of the preferred alternative must include any buffer / no-go areas that will be incorporated, as recommended by the specialist findings, especially if the remainder of the site will be conserved. The updated SDP must also be included in the Environmental Management Programme ("EMPr"), as per regulatory requirements.
- 2.9 In terms of Regulation 34 of the NEMA EIA Regulations, 2014, the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation, the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person (other than the Environmental Assessment Practitioner and Environmental Control Officer) and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014. It is recommended on page 170 of the draft BAR that independent environmental audits be conducted every six months during the construction phase, with one final construction audit at conclusion of construction. The recommended frequency must be included in the relevant section/s of the EMPr. Note that this frequency will be included as a condition should Environmental Authorisation be granted. The applicant must therefore confirm that the recommended frequency can be adhered to, since failure will be deemed as a non-compliance.

2.10 Since Activity 19A of Listing Notice 1 is triggered by the proposed development, it is recommended that a Maintenance Management Plan ("MMP") forms a component of the Environmental Management Programme. Should the Department agree to the proposed MMP, future maintenance work specified within the MMP would not require an Environmental Authorisation prior to the undertaking thereof.

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

- 2.11.1 CapeNature
- 2.11.2 This Department's Coastal Management Sub-Directorate
- 2.11.3 BOCMA
- 2.11.4 Overstrand Municipality
- 2.11.5 Overberg District Municipality
- 2.11.6 Department of Agriculture

2.12 The Public Participation Process ("PPP") must comply with the requirements of Regulation 41 of the EIA Regulations 2014, and proof of compliance with all the steps undertaken must be included in the BAR.

3. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.
4. Please note that the proposed development may not commence prior to an Environmental Authorisation being granted by the Competent Authority.
5. This Directorate reserves the right to revise its comments and request further information from you based on any new or revised information received.

Yours faithfully

 Digitally signed by Andrea  
Thomas  
Date: 2026.02.23 17:45:27  
+0200

pp **HEAD OF COMPONENT**

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

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

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

