LORNAY
ENVIRONMENTAL CONSULTING

BASIC ASSESSMENT REPORT

PROPOSED ESTABLISHMENT OF ADDITIONAL BOAT GARAGES ON PORTION 6 OF THE FARM STOFFELS RIVIER NO. 494, STOFFELS RIVIER, MALGAS

09 OCTOBER 2026

Compiled by:

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Western Cape Government

Department of Environmental Affairs and Development Planning

BASIC ASSESSMENT REPORT

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

APRIL 2024

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APRIL 2024

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

GENERAL PROJECT DESCRIPTION

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

PROPOSED ESTABLISHMENT OF ADDITIONAL STORAGE AND BOAT GARAGES ON PORTION 6 OF THE FARM STOFFELS RIVIER NO. 494, STOFFELS RIVIER, MALGAS

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

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

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

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

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

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

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

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

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

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

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

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

6. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR

due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.

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

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

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

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

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

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

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

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

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

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

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

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	

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

ACRONYMS

DAFF:	Department of Forestry and Fisheries
DEA:	Department of Environmental Affairs
DEA& DP:	Department of Environmental Affairs and Development Planning
DHS:	Department of Human Settlement
DoA:	Department of Agriculture
DoH:	Department of Health
DWS:	Department of Water and Sanitation
EMPr:	Environmental Management Programme
HWC:	Heritage Western Cape
NFEPA:	National Freshwater Ecosystem Protection Assessment

NSBA:	National Spatial Biodiversity Assessment
TOR:	Terms of Reference
WCBSP:	Western Cape Biodiversity Spatial Plan
WCG:	Western Cape Government

ATTACHMENTS

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

The following checklist of attachments must be completed.

APPENDIX			**✓ (Tick) or x (cross)**
Appendix A:	**Maps**		
	Appendix A1:	**Locality Map**	✓
	Appendix A2:	**Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning**	
	Appendix A3:	**Map with the GPS co-ordinates for linear activities**	
Appendix B:	**Appendix B:**	**Site development plan(s)**	✓
	Appendix B2	**A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;**	✓
Appendix C:	**Photographs**		✓
Appendix D:	**Biodiversity overlay map**		✓
Appendix E:	**Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.**		
	Appendix E1:	**Final comment/ROD from HWC**	N/A

	Appendix E2:	**Copy of comment from Cape Nature**	Pending
	Appendix E3:	**Final Comment from the ~~DWS~~ BOCMA**	Pending
	Appendix E4:	**Comment from the DEA: Oceans and Coast**	N/A
	Appendix E5:	**Comment from the DAFF**	N/A
	Appendix E6:	**Comment from WCG: Transport and Public Works**	N/A
	Appendix E7:	**Comment from WCG: DoA**	Pending
	Appendix E8:	**Comment from WCG: DHS**	N/A
	Appendix E9:	**Comment from WCG: DoH**	N/A
	Appendix E10:	**Comment from DEA&DP: Pollution Management**	N/A
	Appendix E11:	**Comment from DEA&DP: Waste Management**	N/A
	Appendix E12:	**Comment from DEA&DP: Biodiversity**	Pending
	Appendix E13:	**Comment from DEA&DP: Air Quality**	N/A
	Appendix E14:	**Comment from DEA&DP: Coastal Management**	Pending
	Appendix E15:	**Comment from the local authority**	Pending
	Appendix E16:	**Confirmation of all services (water, electricity, sewage, solid waste management)**	Pending
	Appendix E17:	**Comment from the District Municipality**	Pending
	Appendix E18:	**Copy of an exemption notice**	N/A
	Appendix E19	**Pre-approval for the reclamation of land**	N/A
	Appendix E20:	**Proof of agreement/TOR of the specialist studies conducted.**	Pending

	Appendix E21:	**Proof of land use rights**	N/A
	Appendix E22:	**Proof of public participation agreement for linear activities**	N/A
Appendix E:	**Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.**		✓
Appendix G:	**Specialist Report(s)** **APPENDIX G1: TERRESTRIAL BIODIVERSITY IMPACT ASSESSMENT**		✓
Appendix H:	**EMPr**		✓
Appendix I:	**Screening tool report**		✓
Appendix:	**The impact and risk assessment for each alternative**		
Appendix:	**Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline**		
Appendix…..	**Any other attachments must be included as subsequent appendices**		

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE: REGION 1		GEORGE OFFICE: BEGION 3
	(City of Cape Town, West Coast District	(Cape Winelands District & Overberg District)	(Central Karoo District & Garden Route District)
Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	Breede Riverine Body Corporate		
Name of contact person for Applicant/Proponent (if other):	Damie Smit		
Company/ Trading name/State Department/Organ of State:	Breede Riverine Body Corporate		
Company Registration Number:	SS289/1984		
Postal address:	PO Box 2000		
	Bellville	Postal code: 7535	
Telephone:	(021) 910 0707	Cell: +27 (0) 83 245 6556	
E-mail:	danie@osro.co.za	Fax: ( )	
Company of EAP:	Lornay Environmental Consulting		
EAP name:	Michelle Naylor		
Postal address:	Unit 5/1F Hemel en Aarde Wine Village,		
	Hermanus	Postal code: 7200	
Telephone:	( )	Cell:	
E-mail:	michelle@lornay.co.za	Fax: ( )	
Qualifications:	Master of Science (Rhodes University)		
EAP registration no:	2019/698		
Duplicate this section where there is more than one landowner Name of landowner:	Breede Riverine Estate Body Corporate		
Name of contact person for landowner (if other):			
Postal address:			
		Postal code:	
Telephone:	( )	Cell:	
E-mail:		Fax: ( )	
Name of Person in control of the land:	As above		
Name of contact person for person in control of the land:			
Postal address:			
		Postal code:	
Telephone:	( )	Cell:	
E-mail:		Fax: ( )	

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	Swellendam Municipality	
Contact person:	Johan van Niekerk	
Postal address:	49 Voortrek Street, Swellendam	
		Postal code: 6740
Telephone	(028) 514 7448	Cell:
E-mail:	jvanniekerk@swellendam.gov.za	Fax: ( )

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

1.	Is the proposed development (please tick):	New		Expansion	x
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				

The proposed site is classified as a previously disturbed site. While no permanent building structures currently stand on the specific extension footprint, the area does **not** represent undisturbed or pristine natural habitat. Historical satellite imagery and botanical specialist ground-truthing confirm that the central development corridor was completely disturbed of natural vegetation prior to August 2009, subsequently suffered dense infestation by invasive alien trees, and was further modified by flood sediment stockpiling following the May 2026 Breede River flood event.

~~3.~~	~~**For Linear activities or developments**~~	
~~3.1.~~	~~Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:~~	
~~3.2.~~	~~Development footprint of the proposed development for all alternatives.~~	~~m²~~
~~3.3.~~	~~Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.~~	
~~3.4.~~	~~Indicate how access to the proposed routes will be obtained for all alternatives.~~	
~~3.5.~~	~~SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives~~	
~~3.6.~~	~~**Starting point co-ordinates for all alternatives**~~	
	~~Latitude (S)~~	~~º~~ ~~‘~~ ~~“~~
	~~Longitude (E)~~	~~º~~ ~~‘~~ ~~“~~
	~~**Middle-point co-ordinates for all alternatives**~~	
	~~Latitude (S)~~	~~º~~ ~~‘~~ ~~“~~
	~~Longitude (E)~~	~~º~~ ~~‘~~ ~~“~~
	~~**End point co-ordinates for all alternatives**~~	

	~~Latitude (S)~~	~~º~~	~~'~~	~~"~~
	~~Longitude (E)~~	~~º~~	~~'~~	~~"~~
~~Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.~~				
4.	**Other developments**			
4.1.	Property size(s) of all proposed site(s):	519 200 m^2 (51.92 ha)		
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):	The existing developed footprint within the subject property comprising residential area, access roads, pathways, existing boat garages (4 boat garage blocks) and associated infrastructure measures approximately **115 214.41 m2 (11.52 ha**).		
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:	Proposed 8 Blocks of storage garages: Approximately **13 000 m^2 (1.3 ha)**.		
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).			

A small section of the subject property, named as Portion 6 of the Farm Stoffels Rivier No. 494, measuring 51.92 ha (519,200 m^2, is proposed for construction of garages for boat and storage purposes. The property currently comprises a sectional title housing development, existing access roads, existing boat garage blocks (4 garage blocks), and a network of informal jeep tracks and pathways traversing the site. The existing developed footprint on the property accounts for approximately 11.52 ha (115,214.41 m^2).

The proposed development entails the addition of the Boat and storage blocks, through an establishment of eight (8) buildings, each comprising five (5) individual storage units, resulting in a total of forty (40) new storage garages designed (See **Figure 1** below). These garage blocks will be located within a development area of approximately 13 000 m^2 (1.3 ha) situated on the inland portion of the property above the 45 m geographical contour line and more than 100 m from the high-water mark of the Breede Rivier Estuary. This positioning was selected to ensure the proposed structures are appropriately located relative to the site topography and existing Boat Garage blocks and that they utilise the disturbed or impacts areas on the subject property as far as possible.

A initial botanical site survey conducted by the Overberg Renosterveld Conservation Trust in 2019, found that the majority of the proposed development area is characterised by a high density of alien vegetation, predominantly *Acacia cyclops* (Rooikrans), with scattered occurrences of *A. saligna* (Port Jackson) and *Eucalyptus conferruminata* (Spider Gum), and a correspondingly low diversity of understorey flora. The Botanical Impact Assessment conducted as part of the EIA process (2026), confirmed that these alien trees were cleared in early 2022, and the central cleared corridor was subsequently used to temporarily store flood sediment and mud, removed from the riverbank dwellings following the May 2026 Breede River flood event along the coastal portion of the property.

Proposed Structures

The proposed project entails the construction of additional garages for storage purposes. Following the botanical specialist ground-truthing and spatial optimization, the preferred layout (Alternative 2) consists of:

- **Garage Units & Storage Blocks:** A total of **eight (8)** garage blocks, each housing five (5) individual storage units, resulting in **forty (40)** new storage garages.
    - Each garage block measures **12 m x 25 m**
    - All garage blocks will be located within an overall layout envelope of approximately **1.3 ha (13,000 m^2)** situated above the 45 m geographical contour line**.** This siting ensures that the development is consolidated directly adjacent to existing storage areas and utilizes historically disturbed ground to the maximum extent.

- Garage blocks will be spaced approximately 2.5 m apart and will include a turning aisle of 26 m to ensure safe manoeuvring space for towing vehicles and boat trailers.
- High-security, open-view / Clearview fencing will be installed around the approved development perimeter prior to construction to strictly confine vehicle movement and prevent contractor laydown or vegetation clearing beyond the authorized footprint

Associated Infrastructure Access

- Access to the proposed storage garage blocks will be facilitated via an existing access road. No new road will be required.
- No service infrastructure will be required for the development. The garages will use solar power for the limited electrical needs, no sewer facilities will be provided.



Figure 1-1: Site development plan (Alternative 2 – Preferred).

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

There is an existing access road providing access to the subject property. No new road will need to be constructed.

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	7	3	0	0	0	0	0	0	0	0	0	4	9	4	0	0	0	0	6

4.7.	Coordinates of the proposed site(s) for all alternatives:			
	Latitude (S)	34 °	20 ‘	51.84 “
	Longitude (E)	19 °	37 ‘	12.31 “

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

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

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

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

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.	YES	NO X
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.	YES	NO X
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3.	YES	NO X
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	YES	NO X
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")	YES	NO X
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	YES X	NO
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	YES	NO X
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.	YES	NO X

3. Other legislation

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

4. Policies

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

1. Western Cape Provincial Spatial Development Framework (2014)

The Western Cape Provincial Spatial Development Framework (PSDF, 2014) was assessed in relation to the proposed additional Boat Garage blocks on Portion 6 of the Farm 494, Malgas. The PSDF (2014) applies five overarching principles quality and liveability, spatial efficiency, spatial justice, accessibility, and sustainability and resilience given effect through three spatial themes: the sustainable use of Provincial resources, the space-economy, and settlement. The following objectives, drawn from these themes, were identified as being of direct relevance to the proposed development and are addressed in turn below:

- R1 – Protect Biodiversity and Ecosystem Services
- R2 – Safeguard Inland and Coastal Water Resources, and Manage the Sustainable Use of Water
- R3 – Safeguard the Western Cape's Agricultural and Mineral Resources, and Manage their Sustainable Use
- E2 – Diversify and Strengthen the Rural Economy
- S1 – Protect, Manage and Enhance Sense of Place, Cultural and Scenic Landscapes

R1: Protect Biodiversity and Ecosystem Services

The PSDF requires that development be directed away from areas of intact or high-value biodiversity, with disturbed or degraded land prioritised for new development footprints. The proposed garage blocks are situated within an area confirmed by a 2019 botanical site survey (Overberg Renosterveld Conservation Trust) to be dominated by a high density of alien vegetation, principally *Acacia cyclops*, with scattered *A. saligna* and *Eucalyptus conferruminata*, and a correspondingly low diversity of indigenous understorey flora. The development footprint therefore comprises an already-degraded, alien-infested area rather than intact natural habitat, and the proposal is considered consistent with the objective of directing new development away from areas of ecological value**.**

R2: Safeguard Inland and Coastal Water Resources

Given the property's location adjacent to the Breede River, the PSDF's objective of safeguarding inland water resources is directly relevant. The proposed garage blocks are located above the 45 m geographical contour line, a positioning specifically selected to set the development back from the river and associated riparian and floodplain areas. No new roads, stormwater infrastructure, sewage infrastructure, or water or electrical connections are required, meaning the proposal introduces no new discharge points, hardened surfaces requiring stormwater management, or servicing infrastructure with the potential to affect the river or its associated water resources. The development is therefore considered to appropriately safeguard the adjacent water resource.

R3: Safeguard Agricultural and Mineral Resources

The PSDF seeks to protect high-potential agricultural land from irreversible transformation. The proposed development footprint (approximately 1.3 ha) represents a small addition relative to the total property extent (51.92 ha) and the already-developed footprint (11.52 ha) and is located on land that is alien-infested rather than under active or potential agricultural production. The proposal does not compromise agricultural land capable of supporting productive use and is considered consistent with this objective.

E2: Diversify and Strengthen the Rural Economy

The PSDF supports appropriately scaled economic activity that diversifies rural economies without undermining the character or resource base on which they depend. The proposed additional Boat Garage blocks supports recreational and tourism-related use of the Breede River, consistent with the existing character and use of the property and surrounding Malgas area, and represents an incremental, low-impact addition to an existing, established land use rather than a new or transformative activity.

S1: Protect, Manage and Enhance Sense of Place, Cultural and Scenic Landscapes

The PSDF places emphasis on protecting the scenic and rural character of landscapes such as the Breede River valley. The proposed garages are designed as an extension of the existing Boat Garage blocks (4 existing garage blocks), utilising the same built form and access arrangement, and are positioned to relate appropriately to the site topography. Access will be via an existing informal route, with no new road infrastructure required, thereby avoiding additional visual or physical disturbance to the surrounding landscape.

2. Overberg District Municipality Integrated Development Plan (2026/27)

The IDP Review for 2026/2027 was assessed in relation to the proposed extension of the Boat Garage blocks on Portion 6 of the Farm Stoffels Rivier No. 494, Malgas an area falling within Swellendam Municipality, itself

one of the four local municipalities constituting the Overberg District. The following components of the IDP were identified as being of direct relevance to the proposed development:

- The District's spatial and settlement context, which specifically identifies Malgas as a rural node of Swellendam Municipality, defined by its pontoon ferry crossing of the Breede River;
- Strategic Goal SG1 (Basic Services and Infrastructure) and SG2 (Local Economic Development);
- Chapter 6: Regional Economic Development and Tourism, which identifies nature-based and river-related recreation as a district priority, and lists Malgas among the district's tourism-relevant towns and villages;
- Section 2.3.2 (Terrestrial Ecosystems) and Section 2.3.4.1 (Catchments) of the Environmental Analysis, which identify invasive alien species and inappropriate development as key pressures on district biodiversity and water resources; and
- Section 2.3.4.4 (Wetlands) and the broader freshwater ecosystems analysis, given the property's location adjacent to the Breede River.

The IDP specifically describes Malgas as a rural settlement within Swellendam Municipality, "located at a pontoon ferry on the Breede River, the last crossing of the river before it reaches the ocean," and situated within an area the IDP describes as boasting "a rich agriculture... and a powerful historical background." The proposed development represents an incremental extension of an existing, established land use (the 4 Boat Garage blocks) within this recognised rural settlement, rather than the introduction of a new land use or the extension of urban development into an undeveloped rural area. It is therefore considered consistent with the settlement pattern the IDP recognises and describes for Malgas.

Basic Services and Infrastructure

SG1 commits the ODM to "ensure the well-being of all in the Overberg through the provision of efficient basic services and infrastructure." Given that the proposed garage blocks require no new sewage treatment, stormwater infrastructure, water connection, or electricity supply, and will be accessed via an existing informal route, the development places no additional demand on municipal basic services infrastructure. This is considered favourable in the context of SG1, as it does not require the Municipality to extend service capacity or infrastructure investment to accommodate the development.

Local Economic Development

SG2 commits the ODM to "promote local economic development by supporting initiatives in the District" that grow the district and rural economies. Chapter 6 of the IDP identifies nature-based tourism, river-related recreation (including sunset cruises), and agri-tourism as core components of the district's tourism offering and specifically lists Malgas among the towns and villages contributing to this offering. The proposed extension of the Boat Garage blocks supports continued recreational use of the Breede River by the local community and visitors, consistent with this recognised economic function of Malgas within the district's tourism economy and is considered to support the objectives of SG2.

The IDP identifies invasive alien species, land degradation, and inappropriate development as key pressures on both terrestrial ecosystems and the Breede catchment (within which the property falls). The proposed development directly responds to these identified pressures: the development footprint is located within an area confirmed by botanical survey to be dominated by alien vegetation (predominantly *Acacia cyclops*), rather than intact indigenous vegetation, and is positioned above the 45 m contour, away from the river and associated riparian habitat. The proposal therefore avoids compounding the pressures the IDP identifies as

threatening the catchment and is sited on land already degraded by the invasive species the IDP flags as a district-wide concern.

Freshwater Ecosystems and the Breede River

The Breede River is recognised in the IDP both as one of the district's estuaries and as part of the Lower Breede catchment within the Breede-Olifants Water Management Area, with the IDP emphasising the importance of protecting such catchments for water quality and the livelihoods (including agriculture) they support. The proposed development's setback above the 45 m contour, its reliance on an existing access route rather than new road infrastructure, and the absence of any new stormwater or wastewater discharge points are considered consistent with the protection of the river and its catchment as valued in the IDP.

3. Swellendam Municipality Integrated Development Plan (2022-2027)

The Swellendam Municipality Integrated Development Plan (IDP) (2022–2027) identifies Malgas as a rural settlement within the Municipality where agriculture, tourism, and the natural environment form the basis of the local economy. The proposed extension of the existing Boat Garage blocks on Portion 6 of the Farm Stoffels Rivier No. 494 was assessed against the objectives and development priorities contained in the IDP. The following components were identified as being directly relevant to the proposed development:

- Strategic Objective 1: Promote sustainable economic growth and employment opportunities;
- Strategic Objective 2: Protect and manage environmental resources in a sustainable manner;
- Sustainable tourism and rural development initiatives;
- Provision and efficient use of municipal infrastructure and services; and
- Protection of the Breede River and surrounding natural environment.

Sustainable Economic Development

The IDP promotes economic growth through the expansion of tourism and recreational opportunities that are compatible with the rural character of the Municipality. The proposed extension of the existing Boat Garage blocks supports recreational boating activities associated with the Breede River and contributes to the local tourism economy without introducing a new or incompatible land use. The proposal therefore aligns with the Municipality's objective of supporting sustainable local economic development while maintaining the area's rural character.

Efficient Use of Existing Infrastructure

The IDP encourages the efficient utilisation of existing infrastructure and discourages unnecessary expansion of municipal services into rural areas. The proposed development will utilise the existing internal access road and does not require new water supply, sewerage, stormwater or electricity infrastructure. As the garages are intended solely for boat storage, the proposal will not generate additional demand on municipal services, thereby supporting the efficient use of existing infrastructure.

Environmental Sustainability

The IDP recognises the importance of conserving biodiversity, protecting water resources, and preventing environmental degradation. The proposed development footprint is located within an area previously identified as being heavily invaded by alien vegetation and has been positioned above the 45 m contour to maintain an appropriate setback from the Breede River. No indigenous vegetation of high conservation value will be targeted, and no infrastructure associated with wastewater or stormwater discharge is proposed. The

development therefore responds positively to the Municipality's objective of protecting environmentally sensitive areas and maintaining the ecological functioning of the Breede River corridor.

Rural Character and Sense of Place

The IDP seeks to maintain the distinctive rural landscape and scenic qualities of settlements such as Malgas. The proposed extension represents a continuation of an existing Boat Garage blocks and will adopt the same architectural form and scale as the existing garage blocks. No new roads or significant earthworks are required, ensuring that the visual character and sense of place of the surrounding landscape are maintained.

5. Guidelines

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

1. Western Cape Biodiversity Spatial Plan Handbook and Guidelines (2023)

The Western Cape Biodiversity Spatial Plan (WCBSP) Handbook and Guidelines (2023) was used as a key decision-support tool during the planning and assessment of the proposed development. The WCBSP identifies Critical Biodiversity Areas (CBAs), Ecological Support Areas (ESAs), Protected Areas, and Other Natural Areas (ONAs) that require appropriate management to ensure the continued functioning of biodiversity, ecological processes, and ecosystem services. The guidelines provide land-use recommendations aimed at avoiding, minimising, or mitigating impacts on biodiversity priority areas and promoting sustainable development.

Broad desktop mapping under the WCBSP (2023) classifies the property as overlapping with Critical Biodiversity Area 1 (CBA1: Terrestrial), reflecting the regional presence of Potberg Ferricrete Fynbos, an ecosystem listed as Critically Endangered (CR). However, detailed site sensitivity verification and botanical ground-truthing conducted by the specialist revealed that broad provincial CBA1 mapping contained inaccuracies, as it mapped historically cleared ground, alien tree-infested corridors, and May 2026 flood sediment stockpiles as CBA1.

In accordance with WCBSP Handbook ground-truthing protocols, the specialist refined the spatial CBA mapping across the study area into three distinct ecological zones:

- **Primary Natural Fynbos (Western Section):** Intact climax vegetation exhibiting high native richness and supporting plant Species of Conservation Concern (SCC). Verified as True CBA1 (Very High Site Ecological Importance) and designated as a strict, permanent No-Go conservation zone.
- **Secondary Recovered Vegetation (Central Area):** Vegetation recovered following pre-2009 clearing and 2022 alien tree removal. Reclassified as CBA2 / ESA1 (Medium SEI).
- Existing garage margins, cleared tracks, and May 2026 flood sediment stockpiles were reclassified as ESA2 / Transformed footprints (Very Low SEI).

2. **The Public Participation Guideline in terms of National Environmental Management Act, 1998 Environmental Impact Assessment Regulations, 2014 as amended: Department of Environmental Affairs, 2017**

This document was used to guide the Public Participation Process for the proposed application and ensure the stakeholder engagement process was inclusive. The aim was to communicate as early as possible, with as many people as possible, through as many different channels as possible.

3. **The Guideline on Need and Desirability - Department of Environmental Affairs, 2017.**

This guideline was utilised in the formulation of the need and desirability assessment for the proposed development application. It provided a structured framework for evaluating whether the proposed activity is consistent with the applicable spatial planning and land use management instruments, including the relevant zoning scheme, Spatial Development Framework (SDF), and Integrated Development Plan (IDP). The guideline assisted in demonstrating the socio-economic rationale for the proposed development, its alignment with identified community needs, and its contribution to sustainable development objectives. The assessment informed the Basic Assessment Report by providing a clear justification for why the proposed activity is necessary and desirable in its proposed location.

6. Protocols

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

Agriculture Theme – High Sensitivity

The National Web-based Environmental Screening Tool rates the proposed development site as High sensitivity for the Agriculture Theme, attributable to the designation of the land as Agricultural Zone 1 and the presence of rainfed annual crop cultivation and planted pastures in the surrounding area. Notwithstanding this desktop sensitivity rating, it is motivated that no further specialist agricultural assessment is required for the proposed development, on the following basis.

While the property is zoned Agricultural Zone 1, the property is not utilised for agriculture The existing developed footprint on the property accounts for approximately 11.52 ha (115,214.41 m^2) and comprises existing residential dwellings, four existing boat storage garages, a boat storage yard, existing access roads, and a network of informal jeep tracks and pathways. The property is therefore already substantially committed to residential and recreational storage uses rather than agricultural production.

The specific area proposed for the construction of the additional boat garage blocks has a well-documented history of disturbance and degradation. A botanical assessment conducted in October 2019 by Dr Odette Curtis-Scott of the Overberg Renosterveld Conservation Trust confirmed that the majority of the proposed development area was at that time covered by a high density of invasive alien vegetation, predominantly *Acacia cyclops* (Rooikrans), with scattered *Acacia saligna* (Port Jackson) and *Eucalyptus conferruminata* (Spider Gum), and a very low diversity of indigenous flora in the understory. The condition of the proposed development site was later confirmed by the botanical specialist to have been historically disturbed. The site is underlain by shallow "koffieklip" Ferricrete gravel, lacks irrigation infrastructure, has been historically disturbed, and is surrounded by built residential storage infrastructure. The proposed development area

therefore does not support, and has not supported, any form of active agricultural production within the recent historical period.

The proposed Boat Garage blocks, consisting of eight (8) blocks at 12 m x 25 m each, represents a minor incremental extension of an existing storage use within a property that is already developed and does not contribute to active agricultural production. The proposed development will not result in the loss of any high-value agricultural land, will not compromise agricultural productivity on surrounding properties, and is compatible with the existing land use pattern of the Stoffels Rivier area, which is characterised by a mix of agricultural, residential, and river-based recreational uses.

Animal Species Theme – High Sensitivity

The National Web-based Environmental Screening Tool rates the proposed development site as High sensitivity for the Animal Species Theme. The sensitivity features identified include two High sensitivity avian species *Neotis denhami* (Denham's Bustard) and *Circus maurus* (Black Harrier) and a number of Medium sensitivity species, including *Podica senegalensis* (African Finfoot), *Circus ranivorus* (African Marsh Harrier), *Hydroprogne caspia* (Caspian Tern), *Afrotis afra* (Southern Black Korhaan), *Chrysoritis brooksi tearei*, and *Aneuryphymus montanus*.

It is motivated that no formal Animal Species Assessment is required for the proposed development based on the following species-specific basis:

***Neotis denhami* (Denham's Bustard) — High Sensitivity**

Denham's Bustard is classified as Vulnerable on the regional South African Red List (BirdLife South Africa, 2024) and as Near Threatened on the global IUCN Red List (BirdLife International, 2016). In South Africa, the species inhabits high rainfall sour grassveld, planted pastures, and cereal croplands, particularly within Fynbos landscapes. In the Western Cape, Denham's Bustard can be locally numerous in mosaics of cultivated pastures, agricultural croplands, and natural vegetation. The species is primarily associated with open ground habitats with low vegetation structure and avoids dense shrubland and closed vegetation cover in favour of open grassland, floodplains, and agricultural land.

The proposed development area is characterised by dense invasive alien vegetation stands (*Acacia cyclops*, *Acacia saligna*), recovering indigenous shrubland, and rocky ferricrete substrate none of which constitutes the open grassland or cultivated pasture habitat preferred by this species. The surrounding landscape similarly comprises dense alien thicket, indigenous fynbos shrubland, and riparian vegetation, with no open grassland of the type favoured by Denham's Bustard present within or immediately adjacent to the proposed development footprint. The proposed development area is therefore assessed as providing negligible habitat value for this species, and no direct impact on Denham's Bustard is anticipated.

***Podica senegalensis* (African Finfoot) — Medium Sensitivity**

The African Finfoot is classified as Vulnerable on the regional South African Red List, with fewer than 1,000 mature individuals estimated in the region and a projected continuing decline of over 10% across three generations. The species primarily inhabits slow-flowing, well-vegetated rivers and streams, particularly within or near protected areas. Its habitat requirements are restricted to lowland to submontane silt-free, well-vegetated rivers and lakes in forest and woodland, and mangroves.

The proposed development footprint is situated above the 45 m contour line and more than 32 m from any mapped watercourse. The development does not encroach into the riparian or estuarine functional zone of the Breede River, which constitutes the only habitat on the broader property that could support African Finfoot. No direct impact on African Finfoot or its habitat is anticipated as a result of the proposed development.

***Circus ranivorus* (African Marsh Harrier) and *Hydroprogne caspia* (Caspian Tern) — Medium Sensitivity**

Both species are associated with wetland, estuarine, and open water habitats (Hockey, P.A.R., Dean, W.R.J. and Ryan, P.G, 2005). Their Medium sensitivity rating for this site is attributable to the property's proximity to the Breede River and Breede Estuary. As the proposed development footprint does not encroach into any riparian, wetland, or estuarine habitat, and is situated more than 32 m from all mapped watercourses, no direct impact on either species or their habitat is anticipated.

***Afrotis afra* (Southern Black Korhaan) — Medium Sensitivity**

Southern Black Korhaan is endemic to southwestern South Africa and is restricted to the non-grassy, winter rainfall Fynbos and Succulent Karoo biomes, occurring in a narrow strip along the southern and western coastlines of South Africa (Hofmeyr, S.D. 2012) . The species has historically been very common but appears to have become scarcer with a more fragmented distribution. The species could potentially utilise intact Fynbos and Renosterveld patches on the property for foraging and breeding. However, as the development footprint has been confined to the degraded, alien-dominated portions of the site with all intact vegetation patches retained as exclusion areas, the residual impact on potential Southern Black Korhaan habitat is assessed as low. Therefore, no further assessment is required for this animal species.

***Chrysoritis brooksi tearei* and *Aneuryphymus montanus* — Medium Sensitivity**

Both invertebrate taxa are identified as Medium sensitivity features associated with the broader landscape. No targeted invertebrate assessment has been undertaken. However, given that the proposed development footprint is confined to historically disturbed and alien-dominated ground which provides significantly reduced habitat quality relative to intact indigenous vegetation the probability of these taxa occurring within the footprint in ecologically significant numbers is assessed as low. The retention of all intact vegetation patches outside the development footprint, specifically the western portion (No-go area) further reduces the risk of impact on these species.

The Animal Species Theme sensitivity ratings, considered in conjunction with the SSV findings, have reinforced the importance of confining the proposed development footprint to the degraded, alien-dominated portions of the site and retaining all intact vegetation patches as exclusion areas. On the basis of the above species-specific motivations, it is motivated that no formal Animal Species specialist assessment is required for this application. Photographic evidence of the current site condition is provided in the annexures to this BAR.

Aquatic Biodiversity Theme – Very High Sensitivity

According to the National Web-based Environmental Screening Tool, the property is mapped as Very High sensitivity under the Aquatic Biodiversity Theme, attributable to its location adjacent to the Breede River. No watercourses or wetlands have been mapped within the proposed development footprint itself.

It is motivated that no formal Aquatic Biodiversity Impact Assessment is required for the proposed development, on the following basis.

Desktop mapping using the Cape Farm Mapper and the NFEPA dataset confirmed that no watercourses or wetlands are mapped within the proposed development footprint itself. Two non-perennial drainage lines are mapped on the broader property, however, the proposed boat storage garage blocks are situated more than 32 m from the edge of these drainage lines, ensuring that the prescribed watercourse buffer applicable under Listing Notice 1 of the 2014 EIA Regulations is not triggered. No groundwater seeps, wetlands, or freshwater features were identified within the proposed development footprint.

The proposed development footprint is situated above the 45 m geographical contour line and does not encroach into the riparian zone, floodplain, estuarine functional zone, or any other aquatic habitat associated with the Breede River or Breede Estuary. The Development area is located more than 100 m from the high water mark of the Breede Rivier. The proposed development does not involve any infilling, excavation, alteration, or disturbance of any watercourse bed or banks, and does not involve any activity that would result in the discharge of effluent, stormwater, or pollutants into any surface water body. No ablution facilities, fuel storage, chemical storage, or waste treatment infrastructure is proposed as part of the development.

The proximity of the Breede River to the property has, however, directly influenced the design and siting of the proposed development in the following ways;

(i) all proposed structures have been confined to land situated above the 45 m contour line; no new stormwater infrastructure discharging toward the river corridor is proposed;
(ii) and existing disturbed surfaces are utilised for access and circulation to the maximum extent practicable, minimising new areas of impermeable surface that could increase surface runoff velocity or volume toward the river and its associated riparian buffer zone.
(iii) More than 100 m from HWM

Archaeological and Cultural Heritage Theme – Low Sensitivity

According to the National Web-based Environmental Screening Tool, the site is mapped as Low sensitivity for the Archaeological and Cultural Heritage Theme. No heritage structures, graves, or historical material were identified within the development corridor. The character of the site will not change as a result of the proposed development. On this basis, it is motivated that no detailed Heritage Impact Assessment is required for the proposed development. Standard chance-finds procedures will nonetheless be included in the EMPr in the event that heritage resources are exposed during construction.

Civil Aviation Theme – High Sensitivity

According to the National Web-based Environmental Screening Tool, the site is mapped as High sensitivity for the Civil Aviation Theme, likely attributable to proximity to an aerodrome or to applicable flight path and obstacle height restrictions. However, no flight paths or aviation obstacles in the vicinity of the site have been identified as being affected by the proposed development. The proposed boat garage structures are of low height and ancillary in nature and will be aligned alongside the existing boat garages already present on the subject property. On this basis, it is recommended that no further specialist assessment is required.

Defence Theme – Low Sensitivity

According to the National Web-based Environmental Screening Tool, the site is mapped as Low sensitivity for the Defence Theme. No defence-related installations, facilities, or restricted airspace associated with military

or national defence use have been identified in relation to the subject property or the proposed development. On this basis, it is motivated that no further specialist assessment is required for this theme.

Palaeontology Theme – Very High Sensitivity

According to the National Web-based Environmental Screening Tool, the site is mapped as Very High sensitivity for the Palaeontology Theme, attributable to the underlying geology of the broader area. The proposed development footprint is limited in extent and confined to shallow foundation excavations required for the boat garage structures, situated adjacent to the existing Boat Garages. Given the limited depth and extent of excavation required, and that no fossil-bearing outcrops or exposures have been identified on the site, it is motivated that no further specialist palaeontological assessment is required, subject to the inclusion of standard chance-fossil-finds procedures in the EMPr in the event that fossil material is exposed during construction.

Plant Species Theme – Medium Sensitivity

According to the National Web-based Environmental Screening Tool, the study area was assigned a Medium Sensitivity for the Plant Species Theme due to the potential presence of sensitive Fynbos (e.g., *Aspalathus spp.*, *Leucadendron spp.*, *Lobostemon spp.*, *Selago spp.*, and *Hermannia spp.*). A comprehensive field ground-truthing survey and botanical assessment was undertaken. A total of 96 plant species were recorded on-site and the survey confirmed the presence of 9 plant Species of Conservation Concern. The confirmed presence of Threatened and Near Threatened SCC elevates the true site-specific sensitivity for intact and recovering natural vegetation to High Sensitivity. However, spatial evaluation confirms that Threatened SCC are concentrated within the intact western primary fynbos patch. Under the preferred Alternative 2 layout, this primary patch is completely avoided as a strict No-Go area.

Terrestrial Biodiversity Theme – Very High Sensitivity

According to the National Web-based Environmental Screening Tool, the property is mapped as Very High sensitivity for the Terrestrial Biodiversity Theme. This rating is driven by broad provincial mapping intersecting Critical Biodiversity Areas (CBA1: Terrestrial), a Critically Endangered ecosystem (Potberg Ferricrete Fynbos) and a Freshwater Ecosystem Priority Area (FEPA) river sub-catchment.

The Terrestrial Biodiversity Impact Assessment verified that while the property falls within Potberg Ferricrete Fynbos, broad provincial Western Cape Biodiversity Spatial Plan (WCBSP 2023) layers contain notable spatial inaccuracies due to site disturbance history. Historical satellite imagery confirms that the central study area was completely disturbed prior to August 2009, subsequently experiencing severe infestation by *Acacia cyclops* (Rooikrans). Following alien clearing in 2022, flood sediment excavated from dwellings flooded by the Breede River in May 2026 was deposited across this central corridor, further modifying the site. The patch of vegetation on the western portion of the property outside the development footprint consist of intact climax vegetation with high native richness and low historical disturbance and thus is verified as Very High SEI.

The secondary vegetation is present within a Central portion of the site, within the proposed development area. The vegetation in this area consists of recovered vegetation, following historical disturbance and alien tree removal. This area is also classified as Medium SEI. The existing garage margins, tracks, rubble mounds, and May 2026 sediment stockpiles areas are mapped as Very Low SEI.

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 1**	Describe the portion of the proposed development to which the applicable listed activity relates.
27	The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for - (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.	The proposed Boat Garage blocks entails the establishment of eight (8) garage blocks (comprising 40 individual storage garage units in total) within a development area of approximately 13 000 m^2 (1.3 ha), situated on a portion of Portion 6 of the Farm Stoffels Rivier No. 494 above the 45 m geographical contour line.
Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 3**	Describe the portion of the proposed development to which the applicable listed activity relates.
12	The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.	The proposed storage block will result in the clearance of indigenous vegetation within an area mapped as Potberg Ferricrete Fynbos, a vegetation type listed as Critically Endangered in terms of The Revised National List of Ecosystems That Are Threatened and In Need of Protection (2022).

Note:
- The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted.
- Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.

The development area is located more than 100 m from the high water mark of the estuary and more than 32 m from any watercourses or wetlands.

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

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

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

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

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

Site Selection and Alternative Properties

No alternative properties or geographical sites were investigated for the proposed development other than Portion 6 of the Farm Stoffels Rivier No. 494, Stoffels Rivier, Malgas, within the Swellendam Municipality. The selection of this specific property is driven by the fact that an established residential and recreational estate the Breede Riverine Estate and existing boat garages comprising four (4) garage blocks are already established on site. The proposed development represents a logical, consolidated extension of this existing infrastructure rather than a greenfield development elsewhere along the Breede River corridor.

Site and Situational Context

The subject property forms part of the Breede Riverine Estate, a residential and recreational estate situated on the southern bank of the Breede Rivier, approximately 6 km downstream of the settlement of Malgas. The property comprises a combination of transformed and degraded areas associated with existing estate infrastructure which accounts for an established footprint of roughly 11.52 ha (115,214.41 m^2) interspersed with recovering secondary vegetation and intact natural habitats. Access to the Breede River for recreational boating is the primary amenity offered by the estate, consequently, the proposed garage structures are sited to serve this storage function directly, utilizing established internal access roads without requiring new linear road construction or off-site infrastructure expansion.

The property is not vegetatively homogeneous and instead comprises a mosaic of vegetation types, reflecting a transitional gradient across the site. The majority of the property, including the proposed development site, falls within Potberg Ferricrete Fynbos, a Critically Endangered vegetation type that extends beyond the property boundary, forming part of a broader regional occurrence of this vegetation type in the surrounding landscape.

Along the northern margin of the property, bordering the Stoffelsrivier, the property transitions into non-terrestrial (estuarine) habitat associated with the river corridor, reflecting the property's frontage onto, and ecological association with, the estuarine environment. Immediately adjacent to this estuarine margin, and extending into the north-eastern portion of the property, Eastern Ruens Shale Renosterveld and Cape Lowland Alluvial Vegetation are also present. This vegetation heterogeneity is relevant to the overall site sensitivity, notwithstanding that the proposed development footprint itself is confined to the Potberg Ferricrete Fynbos unit and avoids the more sensitive estuarine and alluvial vegetation types along the river margin.

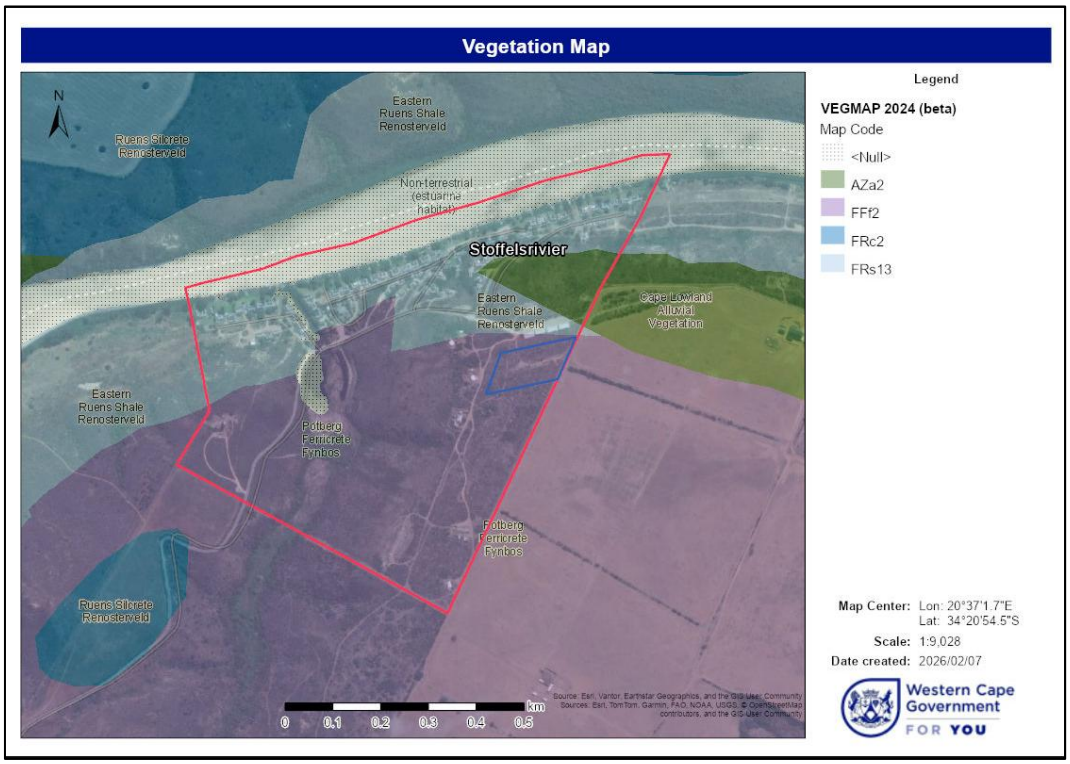


Figure 1-2: Vegetation present on the subject property.

Broader-Scale Context

At a broader landscape scale, the Breede Rivier supports an estuary of high regional and national ecological importance. The stretch of river adjacent to the subject property falls within a rural, low-density settlement matrix characterized by agricultural land interspersed with river-frontage recreational estates. By consolidating the proposed 40 boat garages against existing built infrastructure on previously modified ground, Alternative 2 (preferred) preserves regional ecological connectivity, prevents urban sprawl along the riverbank, and aligns with the sustainable development objectives of the Swellendam Spatial Development Framework (SDF).

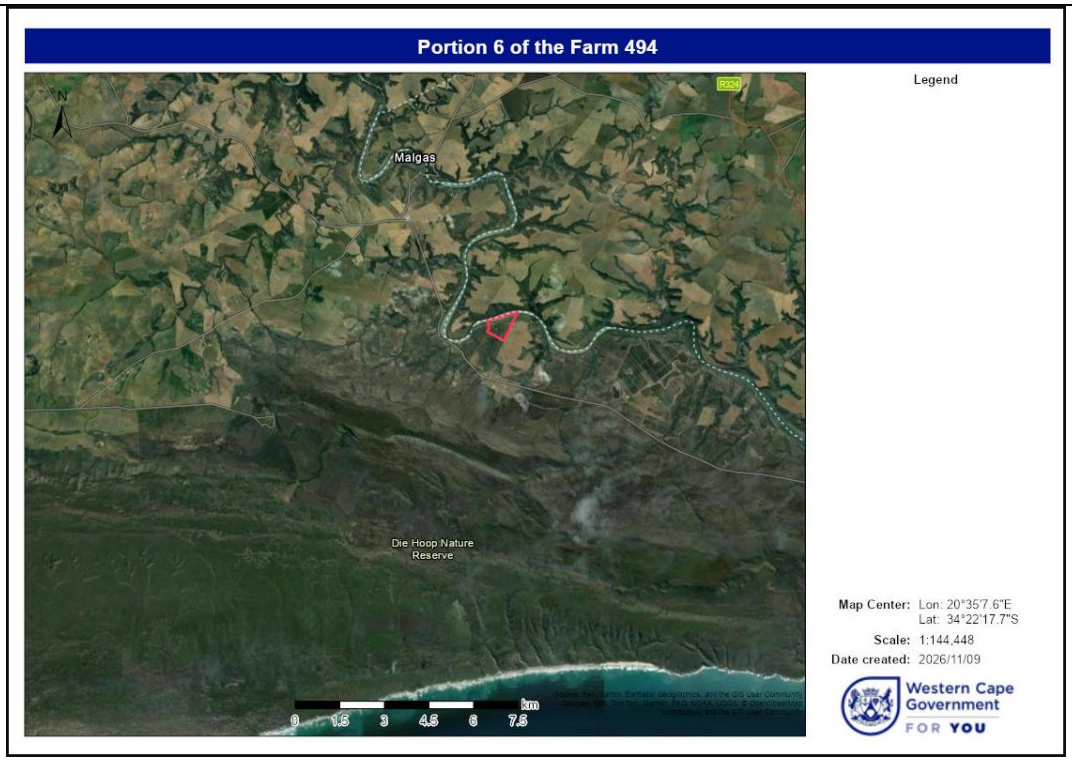


Figure 1-3: Location of the preferred property – Portion 6 of the Farm 494.

Preferred Alternative 2 entails the establishment of eight (8) new garage blocks, each containing five (5) individual storage units, providing a total of forty (40) new boat storage garages. Each garage block measures 12 m x 25 m situated within an overall layout envelope of approximately 1.3 ha (13,000 m^2). The preferred layout is consolidated directly adjacent to the existing boat garage blocks, situated entirely above the 45 m geographical contour line and positioned more than 100 m (approximately 245 m) from the High-Water Mark (HWM) of the Breede River Estuary. Furthermore, the facilities are designed strictly as "dry" storage blocks requiring no water, electricity, or sewage/effluent infrastructure, ensuring zero operational discharge into the surrounding sub-catchment.

Botanical Sensitivity & Layout Optimization

The subject property exhibits a transitional vegetation gradient. Along its northern margin bordering the Stoffels Rivier and Breede River, the property transitions into non-terrestrial estuarine habitat, bordered by Eastern Rûens Shale Renosterveld and Cape Lowland Alluvial Vegetation. The southern inland portion where the development is located is underlain by Potberg Ferricrete Fynbos, an ecosystem listed as Critically Endangered (CR).

While broad desktop mapping under the Western Cape Biodiversity Spatial Plan (WCBSP 2023) designates the area as Critical Biodiversity Area 1 (CBA1), ground-truthing verified that the central development corridor was cleared prior to 2009, heavily infested by *Acacia cyclops* (cleared in 2022), and further modified by May 2026 flood sediment stockpiles. Guided by specialist sensitivity mapping, Alternative 2 (preferred) was spatially optimized to completely avoid the intact primary natural fynbos patch on the western portion of the property (Very High SEI). Instead, Alternative 2 restricts direct habitat transformation to 0.1139 ha of secondary vegetation (CBA2/ESA1) and maximizes the use of 0.1261 ha of modified ground (ESA2), achieving zero direct loss of primary CBA1 fynbos and reducing residual ecological impacts to a Low significance level.

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

The proposed development, involving the construction of the additional boat garage blocks, is consistent with the existing land use rights applicable to the property, as indicated in the Notice of Intent (NOI) and the accompanying application form. The subject property is zoned Agricultural Zone 1, and the proposed Boat Garage blocks are appropriately situated within this agriculturally zoned land.

The property already accommodates an existing Boat Garage blocks comprising four (4) boat garages, established under the existing land use rights applicable to the property. The proposed additional garage blocks constitute an extension of this existing, lawfully established use, and are therefore in line with, and represent a continuation of, the existing land use rights already exercised on the subject property.

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

No potential conflict exists between the existing approvals applicable to the proposed site, as indicated in the Notice of Intent (NOI) and/or application form, and the proposed development. The proposed additional Boat Garage blocks constitutes an extension of the existing established land use on the property and is consistent with the existing land use rights and approvals already applicable to the site. Accordingly, no conflict resolution measures are required in this regard.

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

Western Cape Provincial Spatial Development Framework (2014)

The Western Cape Provincial Spatial Development Framework (PSDF, 2014) was assessed in relation to the proposed Boat Garage blocks on Portion 6 of the Farm 494, Stoffels Rivier. The PSDF applies five overarching principles quality and liveability, spatial efficiency, spatial justice, accessibility, and sustainability and resilience given effect through three spatial themes: the sustainable use of Provincial resources, the space-economy, and settlement. The following objectives, drawn from these themes, were identified as being of direct relevance to the proposed development and are addressed in turn below:

- R1 – Protect Biodiversity and Ecosystem Services
- R2 – Safeguard Inland and Coastal Water Resources, and Manage the Sustainable Use of Water
- R3 – Safeguard the Western Cape's Agricultural and Mineral Resources, and Manage their Sustainable Use
- E2 – Diversify and Strengthen the Rural Economy
- S1 – Protect, Manage and Enhance Sense of Place, Cultural and Scenic Landscapes

R1: Protect Biodiversity and Ecosystem Services

The PSDF requires that development be directed away from areas of intact or high-value biodiversity, with disturbed or degraded land prioritised for new development footprints. The proposed garage blocks are situated within an area confirmed by a 2019 botanical site survey (Odette, Overberg Renosterveld Conservation Trust) to be dominated by a high density of alien vegetation, principally *Acacia cyclops*, with scattered *A. saligna* and *Eucalyptus conferruminata*, and a correspondingly low diversity of indigenous understorey flora. The development footprint therefore comprises an already-degraded, alien-infested area rather than intact natural

habitat, and the proposal is considered consistent with the objective of directing new development away from areas of ecological value.

R2: Safeguard Inland and Coastal Water Resources

Given the property's location adjacent to the Breede River, the PSDF's objective of safeguarding inland water resources is directly relevant. The proposed garage blocks are located above the 45 m geographical contour line, a positioning specifically selected to set the development back from the river and associated riparian and floodplain areas. No new roads, stormwater infrastructure, sewage infrastructure, or water or electrical connections are required, meaning the proposal introduces no new discharge points, hardened surfaces requiring stormwater management, or servicing infrastructure with the potential to affect the river or its associated water resources. The development is therefore considered to appropriately safeguard the adjacent water resource.

R3: Safeguard Agricultural and Mineral Resources

The PSDF seeks to protect high-potential agricultural land from irreversible transformation. The proposed development footprint (approximately 1.3 ha) represents a small addition relative to the total property extent (51.92 ha) and the already-developed footprint (11.52 ha) and is located on land that is alien-infested rather than under active or potential agricultural production. The proposal does not compromise agricultural land capable of supporting productive use and is considered consistent with this objective.

E2: Diversify and Strengthen the Rural Economy

The PSDF supports appropriately scaled economic activity that diversifies rural economies without undermining the character or resource base on which they depend. The additional proposed Boat Garage blocks supports recreational and tourism-related use of the Breede River, consistent with the existing character and use of the property and surrounding Malgas area, and represents an incremental, low-impact addition to an existing, established land use rather than a new or transformative activity.

S1: Protect, Manage and Enhance Sense of Place, Cultural and Scenic Landscapes

The PSDF places emphasis on protecting the scenic and rural character of landscapes such as the Breede River valley. The proposed garages are designed as an extension of the existing Boat Garage (4 existing garage blocks), utilising the same built form and access arrangement, and are positioned to relate appropriately to the site topography. Access will be via an existing informal route, with no new road infrastructure required, thereby avoiding additional visual or physical disturbance to the surrounding landscape.

4.2	The Integrated Development Plan of the local municipality.

Swellendam Municipality Integrated Development Plan (2022–2027)

The subject property is situated within Stoffels Rivier, a rural riverfront settlement located approximately 6 km from Malgas, within the jurisdiction of the Swellendam Local Municipality. The Swellendam Municipality Integrated Development Plan (IDP) (2022–2027) identifies settlements such as Stoffels Rivier and Malgas as rural nodes in which agriculture, tourism, and the natural environment form the basis of the local economy. The proposed extension of the existing boat garage blocks on Portion 6 of the Farm Stoffels Rivier No. 494 was assessed against the objectives and development priorities contained in the IDP, with the following components identified as directly relevant to the proposed development:

- Strategic objective 1: promote sustainable economic growth and employment opportunities;
- Strategic objective 2: protect and manage environmental resources in a sustainable manner;
- Sustainable tourism and rural development initiatives;
- Provision and efficient use of municipal infrastructure and services; and
- Protection of the Breede River and surrounding natural environment.

Sustainable economic development

The IDP promotes economic growth through the expansion of tourism and recreational opportunities that are compatible with the rural character of the municipality. The proposed extension of the existing boat garage blocks supports recreational boating activities associated with the Breede River and contributes to the local tourism economy without introducing a new or incompatible land use. The proposal therefore aligns with the municipality's objective of supporting sustainable local economic development while maintaining the area's rural character.

Efficient use of existing infrastructure

The IDP encourages the efficient utilisation of existing infrastructure and discourages the unnecessary expansion of municipal services into rural settlements such as Stoffels Rivier. The proposed development will make use of the existing internal access road and does not require new water supply, sewerage, stormwater, or electricity infrastructure. As the garages are intended solely for boat storage, the proposal will not generate additional demand on municipal services, thereby supporting the efficient use of existing infrastructure within the settlement.

Environmental sustainability

The IDP recognises the importance of conserving biodiversity, protecting water resources, and preventing environmental degradation. The proposed development footprint is located within an area previously identified as being heavily invaded by alien vegetation and has been positioned above the 45 m contour to maintain an appropriate setback from the Breede River. No indigenous vegetation of high conservation value will be targeted, and no infrastructure associated with wastewater or stormwater discharge is proposed. The development therefore responds positively to the municipality's objective of protecting environmentally sensitive areas and maintaining the ecological functioning of the Breede River corridor.

Rural character and sense of place

The IDP seeks to maintain the distinctive rural landscape and scenic qualities of settlements such as Stoffels Rivier and Malgas. The proposed extension represents a continuation of an existing, established boat garage and will adopt the same architectural form and scale as the existing garage blocks. No new roads or significant earthworks are required, ensuring that the visual character and sense of place of the Stoffels Rivier settlement and the surrounding landscape are maintained.

4.3.	The Spatial Development Framework of the local municipality.

The Swellendam Municipality Spatial Development Framework (SDF), as contained within the IDP (2022–2027), provides spatial guidance for land use and development within the municipal area, translating the IDP's strategic objectives into spatially referenced categories and development guidelines. The SDF identifies Stoffels Rivier

and Malgas as rural settlements situated along the Breede River corridor, within which development is guided by the area's agricultural, tourism, and environmental characteristics rather than urban growth imperatives.

The subject property, Portion 6 of the Farm Stoffels Rivier No. 494, falls within Agricultural land use zoning of the Swellendam SDF. The proposed extension of the existing boat garage park was assessed against the applicable spatial guidelines for this designation, including:

- Consolidation of development within existing developed footprints, rather than the extension of development into undeveloped or agricultural land; and
- Maintenance of appropriate setbacks from watercourses and the Breede River corridor in line with the Breede Rivier Estuary Management Plan.

The proposed development is considered consistent with these spatial guidelines. The development represents an extension of an existing, established land use within the already-developed portion of the Breede Riverine Estate, rather than a new development within an undeveloped or agriculturally zoned area. The development footprint is sited above the 45 m contour and maintains a setback of more than 100 m from the High-Water Mark of the Breede River Estuary, consistent with the SDF's approach to managing development within the river corridor. Furthermore, the siting of the development within a previously degraded and alien-infested area, avoiding intact vegetation and the rectified Critical Biodiversity Areas, aligns with the SDF's objective of directing development away from environmentally sensitive spatial categories.

On this basis, the proposed extension of the boat garage park is considered to be spatially consistent with the guidance and land use categories set out in the Swellendam Municipality SDF.

4.4.	The Environmental Management Framework applicable to the area.

No EMF in place.

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

To be added after the first round of Public Participation Process.

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

According to the Western Cape Biodiversity Spatial Plan (2023), the site is mapped as a Critical Biodiversity Area (CBA1; terrestrial) in respect of terrestrial biodiversity, reflecting the site's broader significance as Potberg Ferricrete Fynbos (Critically Endangered) vegetation type. In terms of the WCBSP Handbook, CBA1 areas are regarded as irreplaceable or near-irreplaceable for meeting biodiversity targets, and the guideline management objective is "Natural" meaning land use should remain natural, with any transformation avoided where possible and only considered where no reasonable alternative exists.

The ground-truthing conducted by the botanical specialist verified that the WCBSP (2023) layers contain spatial inaccuracies, as they do not account for the site's complex anthropogenic disturbance history. Historical satellite imagery and site evaluations confirm that the central study corridor was in a disturbed prior to August 2009. Following this, the area was covered dense infestation by NEM:BA-listed invasive alien trees, predominantly *Acacia cyclops* (Rooikrans), alongside scattered *Acacia saligna* (Port Jackson) and *Eucalyptus conferruminata* (Spider Gum). While alien tree clearing was undertaken in early 2022, this history of severe

infestation significantly reduced the functional CBA1 value and ecological integrity of the central footprint relative to the surrounding intact fynbos.

The ecological character of the central footprint was further modified following a severe flood event along the Breede River in May 2026. The flood waters inundated dwellings and internal road infrastructure across the estate, depositing substantial volumes of river sand and silt. To restore residential access and safety, sediment was removed from flooded infrastructure as an emergency flood response. Because depositing or stockpiling this material in aquatic features or watercourse buffers would have triggered a listed activity under the National Water Act (NWA; Act 36 of 1998) or NEMA EIA Regulations, no alternative off-site stockpiling location was legally or logistically available. Consequently, the excavated sediment was placed strictly across the central corridor that was already degraded and cleared of alien trees, ensuring that no indigenous vegetation clearing took place to accommodate the stockpiles. Today, this area consists of modified ground with only low, sparse remnants of recovering secondary vegetation.

The botanical specialist further refined the BSP based on true verification of the nature of the current state of the site such that three zones were identified based on findings. These zones consist of primary natural vegetation on the western section of the property, this area is covered in intact vegetation with high native species richness and plant species of conservation concern and was verified as true CBA1 with Very High SEI. The secondary recovered vegetation section within the central area proposed for the development was reclassified as CBA2/ESA1 by the botanist and was given an SEI score of Medium. Lastly, the modified margins including roads, transformed areas were all reclassified as ESA2 and were given a Very Low SEI score.

The refinement of the original layout (Alternative 1) was guided by the botanical specialist. The preferred layout (Alternative 2) completely avoids the western CBA1 (No-Go zone), and restricts necessary clearing within areas of secondary vegetation, and maximizes the utilization of 0.1261 hectares of modified land (including the May 2026 flood sediment stockpiles). By directing development onto degraded ground and achieving zero direct loss of primary natural CBA1 habitat, Preferred Alternative 2 aligns directly with the WCBSP Handbook guidelines, keeping residual ecological impacts at a Low significance level and rendering formal biodiversity offsets unnecessary

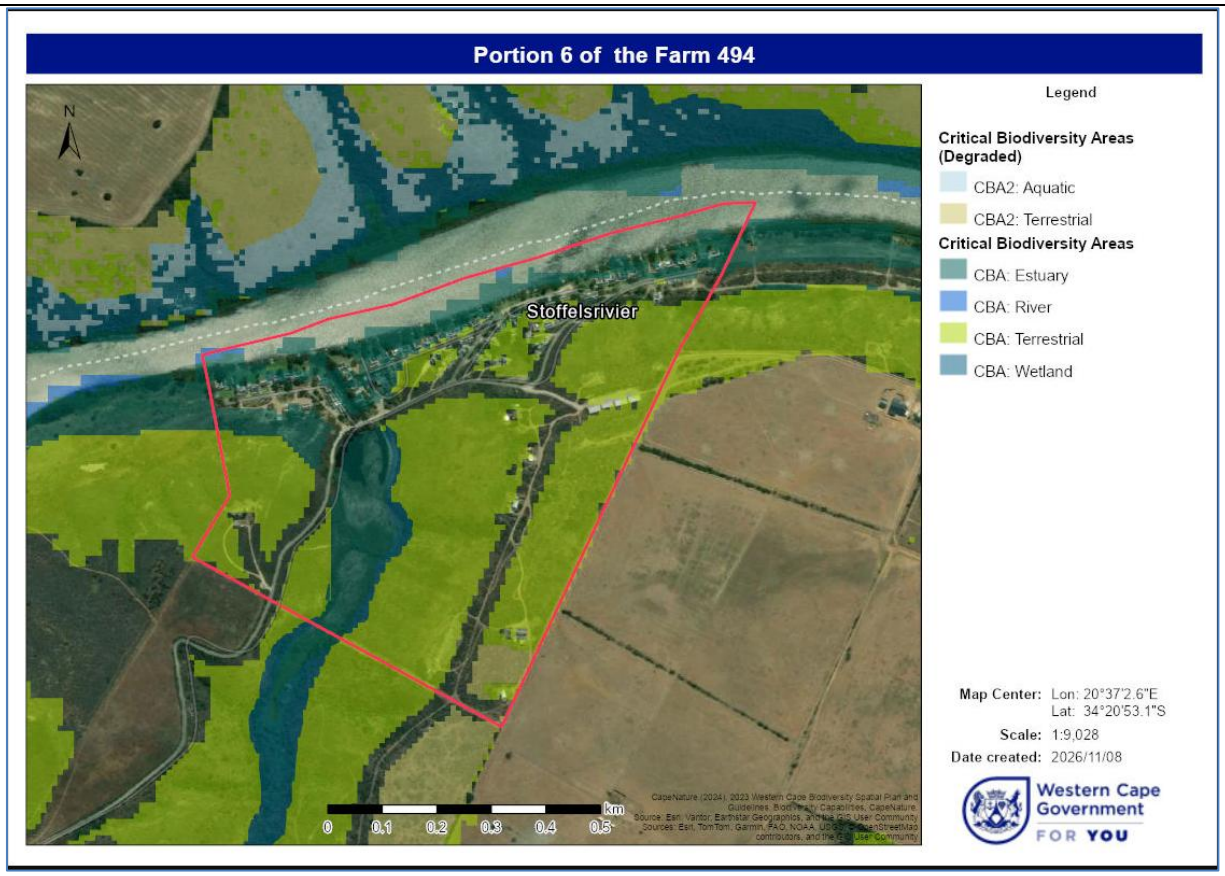


Figure 2-1: According to Western Cape Biodiversity Spatial Plan (2023) the site is mapped as Critical Biodiversity Area 1; terrestrial.

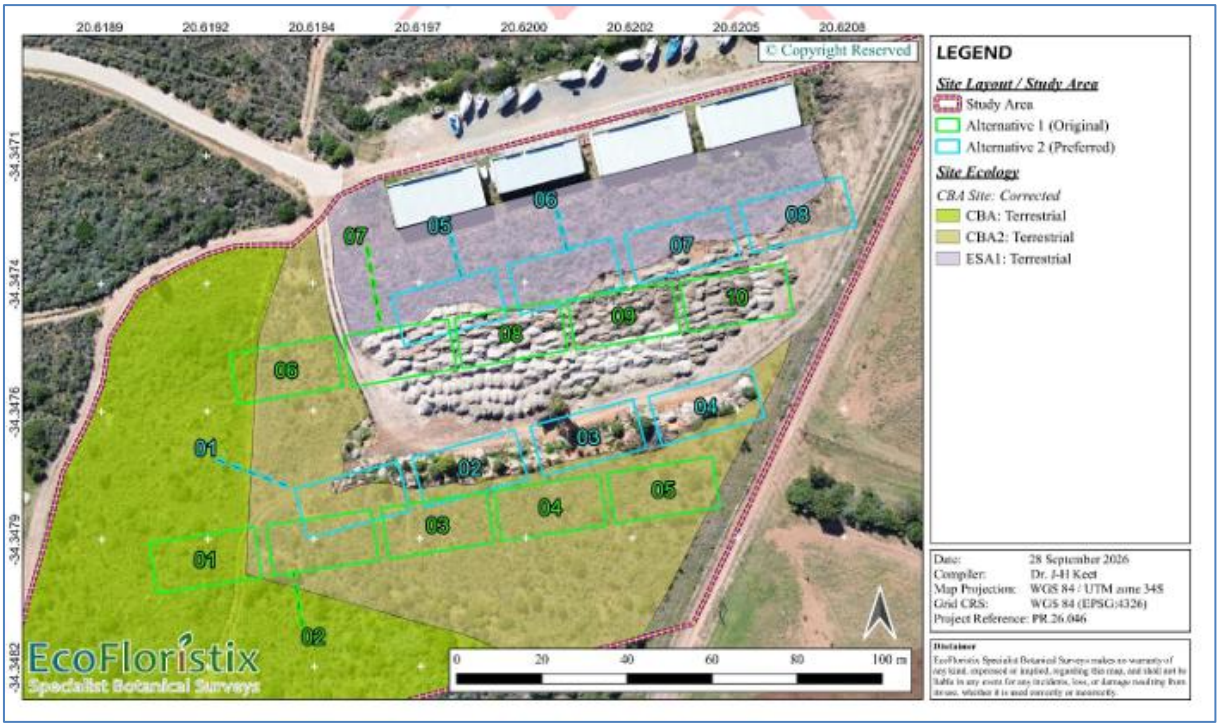


Figure 2-2: Corrected Critical Biodiversity Areas within the study area. ***Source***; (Keet, 2026).

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

The subject property is situated adjacent to the Breede River Estuary and falls within the Coastal Protection Zone as defined in terms of the Integrated Coastal Management Act, 2008 (Act 24 of 2008) (ICMA). In terms of Section 17 of ICMA, the purpose of the Coastal Protection Zone is to protect the ecological integrity of the coastal environment, to ensure that the use of land adjacent to coastal public property does not negatively affect the coastal environment, and to make land near the coast available for public use where appropriate, while managing risks associated with dynamic coastal processes such as flooding and erosion.

The proposed development is consistent with this intention, the footprint is located more than 100m from the High-Water Mark of the Breede Rivier estuary, with no proposed infrastructure situated within the 100m HWM buffer and above the 45m topographical contour. This siting avoids direct encroachment on the estuarine functional zone (EFZ) and associated riparian/wetland habitat, reduces exposure of the development to coastal hazards (flooding, erosion, storm surge), and maintains the ecological functioning of the immediate estuary margin in keeping with the CPZ's core objective of managing development to protect, rather than compromise, coastal ecological processes.

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

Screening tool report has not change from the one submitted with the NOI.

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

The proposed development is situated outside the urban edge. The proposed boat garage storage blocks are, by their nature, dependent on proximity to the Breede Rivier estuary for practical use and cannot reasonably be located within an urban area. The development is limited to storage use only, requires no additional bulk services or municipal infrastructure, and therefore does not place demand on urban service capacity that would otherwise justify prioritising a vacant urban site. As such, the proposal does not compete with or undermine the objective of optimising vacant urban land, as no urban alternative would serve the intended purpose.

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

The proposed development as indicated above, mainly seeks the development for the proposed Boat and storage Garage Park and will not require extension of service infrastructure.

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

The proposal only pertains to the expansion of the existing Boat Garage Park and will not result to any changes in the service infrastructure or electricity demands. Therefore, no services confirmation is required.

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

The need and desirability of the proposed development on Portion 6 of the Farm Stoffels Rivier No. 494, Malgas, has been assessed in accordance with the Department of Environmental Affairs and Development Planning (DEA&DP) Guideline on Need and Desirability (March 2013) and the DEA Integrated Environmental Management Guideline Series. These guidelines require the need and desirability of a proposed activity to be considered in

relation to two interrelated themes, namely: (i) securing ecologically sustainable development and the wise use of natural resources; and (ii) promoting justifiable economic and social development.

Ecological integrity considerations

The property is situated adjacent to the Breede River Estuary and falls within a mapped Critical Biodiversity Area 1 (CBA1) for terrestrial biodiversity. This sensitivity is primarily associated with the underlying Potberg Ferricrete Fynbos, a Critically Endangered ecosystem status present on the proposed development footprint.

A follow-up site survey undertaken by the botanist confirmed that portions of the previously disturbed vegetation on the property have undergone notable recovery following earlier alien vegetation clearing. These recovering, intact vegetation patches support a number of Species of Conservation Concern (SCC) and are consequently regarded as areas of high ecological sensitivity.

In response to these findings, the development layout was refined to avoid intact, high-sensitivity vegetation as far as practicable. The original proposal considered ten boat garage blocks, each measuring approximately 12 m × 25 m (300 m^2). Through the alternatives assessment and botanical specialist input, the initial layout was refined in order to minimise the loss of vegetation within areas of intact natural vegetation. Therefore, Alternative 2 (preferred) utilises the previously disturbed/degraded portion of the property as far as possible, ensuring less disturbance to the intact vegetated areas on the property. Additionally, the preferred layout also introduces reduction in garage blocks, with eight (8) boat garages blocks proposed. This refined layout therefore demonstrates a clear response to the ecological sensitivity of the property by prioritising the use of already disturbed areas and minimising impacts on intact, high-sensitivity vegetation and associated SCC as far as possible.

The property is also traversed by mapped non-perennial drainage lines. The preferred development footprint is located more than 32m from the watercourse features and maintains a setback of more than 100 m from the High-Water Mark of the Breede River Estuary. The proposed development therefore avoids direct impacts on the estuarine environment and associated watercourse features.

Socio-economic considerations

The proposed activity is limited to the provision of boat storage facilities and does not require additional bulk municipal services or significant new municipal infrastructure. Consequently, the development is not expected to place an incremental demand on existing municipal service capacity.

The property is situated outside the urban edge. As such, considerations relating specifically to the optimisation of vacant land within existing urban areas are not directly applicable to the proposal. Furthermore, the functional purpose of the facility is intrinsically linked to its proximity to the Breede River and associated boating activities. An alternative location further away from the river would therefore not reasonably serve the intended purpose of the proposed boat garage facility.

The proposed development would accordingly provide a practical facility for the storage of boats while making use of an existing disturbed portion of the property and without requiring substantial additional municipal infrastructure.

Best Practicable Environmental Option

When considered holistically, the refined preferred layout represents the Best Practicable Environmental Option (BPEO) for the proposed activity at this location. The BPEO has been informed by the alternatives assessment

and specialist input, with the layout progressively refined from an original ten-unit proposal down to the preferred eight-unit layout in order to avoid and minimise environmental impacts.

The siting of all eight preferred blocks entirely within previously disturbed/degraded areas, avoiding intact, high-sensitivity vegetation and most SCC, demonstrates the application of the mitigation hierarchy and a clear effort to reduce ecological impacts.

The preferred layout also maintains an appropriate setback from the Breede River Estuary and avoids direct impacts on the mapped non-perennial drainage features. The development consequently avoids or minimises impacts on the estuarine environment, watercourses, and intact high-sensitivity vegetation to the greatest extent practicable through the alternatives assessment process.

The proposed activity is therefore considered needed, as it responds to an identified practical requirement for boat storage in close proximity to the Breede River, and desirable, as the preferred layout has been iteratively refined in response to specialist environmental input to avoid and minimise impacts on sensitive environmental features. The proposal provides for the intended use while making use of an already disturbed portion of the property and avoiding the need for significant additional municipal infrastructure.

SECTION F: PUBLIC PARTICIPATION

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

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

N/A

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

To be included after PPP 1.

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

DEA&DP: Land Use DEADP: Biodiversity and Coastal Management DEA&DP Coastal Management Unit National Department of Agriculture Cape Nature BOCMA Overberg District Municipality Swellendam Municipality

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

N/A

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

To be included after PPP 1.

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

To be included after PPP 1.

Note:

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

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

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

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

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

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

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

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. Groundwater

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

2. Surface water

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

3. Coastal Environment (Estuarine Environment)

3.1.	Was a specialist study conducted?	YES	NO X
3.2.	Provide the name and/or company who conducted the specialist study.		
N/A – the development area is located more than 100 m from the high water mark.			
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		

Section 63 of Integrated Coastal Management Act (2008) – the site is not located within 100 m of the high water mark of the Breede River estuary.

Section 63 of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (ICMA) requires that, where an environmental authorisation is required for a coastal activity, the competent authority must take all relevant factors into account. Of relevance to this application is whether the proposed development will affect coastal public property, the Coastal Protection Zone (CPZ) or coastal access land, and if so, whether it is consistent with the purpose for which these areas are established. In addition, given the location of the property adjacent to the Breede River Estuary, consideration must be given to the applicable estuarine management plans, coastal management programmes, coastal management lines and coastal management objectives. The likely impact of coastal environmental processes on the proposed activity must also be considered, as well as whether the development is situated within coastal public property, the CPZ or coastal access land and, if so, whether it is consistent with the purpose for which these areas are established.

To give effect to these considerations, the subject property was reviewed against the DEA&DP Coastal Management Map Viewer, which maps the CPZ, the Coastal Management Line (CML), the High-Water Mark, coastal public property and coastal access land, together with the Estuarine Environmental Integrity, Coastal/Estuarine Dynamics and Rural Risk Zone layers applicable to the Breede River Estuary. This review confirmed that the proposed development footprint is situated outside of the mapped CPZ and outside of the mapped CML and does not fall within any of the mapped Rural Risk Zones (refer to **Figure 3** below).

On this basis, the considerations in Section 63 which apply specifically where a development is situated within coastal public property, the CPZ or coastal access land will not be affected, as the footprint does not affect any of these designated areas. Notwithstanding this, given the property's proximity to the Breede River Estuary, the remaining relevant factors were applied as a precautionary measure in siting the development. These include the applicable estuarine management plan and coastal management objectives for the Breede River, as well as the likely impact of dynamic coastal and estuarine processes, such as flooding and erosion, on the proposed activity.

This consideration directly informed the layout of the proposed development. The footprint is positioned landward of the 45 m contour and more than 100 m from the High-Water Mark of the Breede River Estuary in excess of the mapped CPZ and CML setbacks applicable to the site. This siting was adopted as a deliberate design response to reduce the development's exposure to coastal and estuarine hazards. It also supports consistency with the Estuarine Management Plan applicable to the Breede River Estuary, although the footprint falls outside the area to which the Plan formally applies.

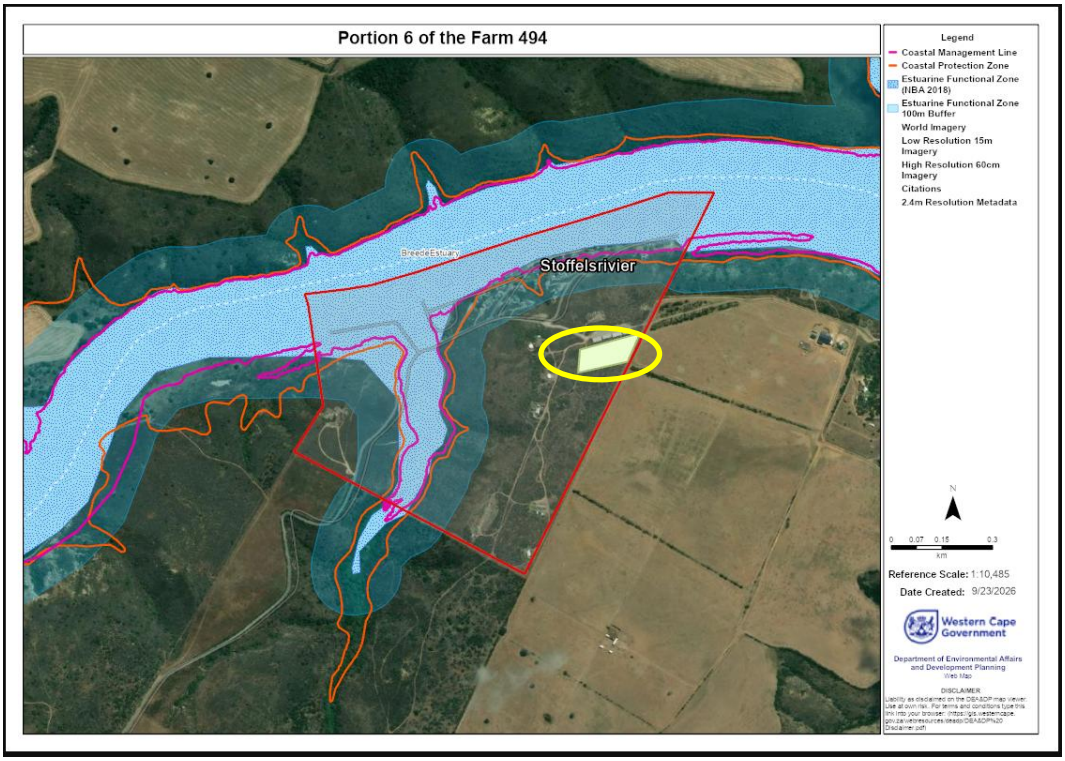


Figure 3: View of the subject property, including the proposed development area (yellow circle) in relation to the mapped Coastal Management Line, Coastal Protection Zone, Estuarine Environmental Integrity and Coastal/Estuarine Dynamics layers, Rural Risk Zones, and High-Water Mark, as extracted from the DEA&DP Coastal Management Map Viewer.

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

The site is not located within 100 m of the high-water mark of the estuary and is located significantly more than 5m above the 5 m contour / Estuarine Functional Zone.

The Draft Breede River Estuarine Management Plan (EMP, 2025) establishes an overarching framework for maintaining the ecological integrity, water quality, and biodiversity of the estuary by regulating land use, building control, and infrastructural development along the river corridor. A central directive of the EMP is the implementation of an Estuary Zonation Plan (EZP) and development buffer zones including the Estuarine Functional Zone (EFZ), Coastal Protection Zone (CPZ), Coastal Management Lines (CML), and prescribed watercourse buffers to prevent inappropriate encroachment and cumulative habitat degradation. In direct response to these strategic EMP objectives, the proposed expansion of the boat storage facility on Portion 6 of Farm Stoffels Rivier No. 494 was designed to strictly adhere to the EMP's spatial planning and risk-avoidance principles.

To align with the EMP's mandate to protect estuarine functional areas and riparian buffer zones, the proposed development footprint has been intentionally set back well beyond regulated estuarine limits. Specifically, the

eight additional boat storage blocks are positioned more than 245 meters from the edge of the Breede River Estuary and strictly elevated above the 45-meter geographical contour line, ensuring complete exclusion from the EFZ, CPZ, and coastal risk zones. Furthermore, all proposed structures maintain a setback of more than 32 meters from mapped non-perennial drainage lines and wetlands on the property, thereby respecting the 32-meter riparian buffer zone prescribed under environmental regulations and emphasized in the EMP for bank and watercourse protection.

The EMP identifies bank destabilisation, unmanaged infrastructure expansion and surface water contamination associated with development adjacent to the estuary as key threats. The eight (8) proposed boat garage blocks will be located alongside the four existing garage blocks, within an area characterised by historical disturbance and alien vegetation infestation. The development will also not require the expansion of water or sewage infrastructure. Consequently, no additional impacts on estuarine water quality or hydrological regimes are anticipated.

Moreover, the EMP establishes governance protocols requiring development proposals within estuarine influence zones to undergo appropriate environmental assessment and to align with applicable Spatial Development Frameworks (SDFs) and municipal zoning schemes. In accordance with these governance protocols and applicable local policies, the siting of the additional garage blocks, together with their location within the broader regional context discussed above, is considered consistent with the relevant planning and environmental management objectives.

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

The subject property is located adjacent to the Breede Rivier Estuary, as indicated in Figure 3 above, the proposed development footprint is not situated within the modelled Coastal Risk Zones, Coastal Protection Zone (CPZ), Littoral Active Zone (LAZ), or Estuarine Functional Zone (EFZ). The proposed development footprint is positioned more than 245 meters from the edge of the estuary and elevated above the 45-meter geographical contour line, while maintaining a buffer of more than 32 meters from all mapped non-perennial drainage lines and wetlands on the property.

The mapping and presence of these sensitive coastal and estuarine zones functioned as critical planning boundaries, directly influencing the siting, scale, and spatial design of the project. Rather than encroaching upon dynamic coastal landforms or aquatic functional areas, the development has been deliberately confined to a previously modified and historically degraded area. The eight proposed boat storage blocks represent a minor extension that is clustered directly alongside the four existing boat garage blocks and utilizes existing access tracks and internal circulation routes. This approach restricts physical disturbance to alien-infested, disturbed ground and prevents the fragmentation of intact natural habitats or sensitive coastal corridors.

Siting the development entirely outside of the Coastal Risk Zones, CPZ, LAZ, and EFZ ensures long-term operational safety and ecological protection. Positioned safely above flood-prone elevations and dynamic estuarine processes, the structures are protected from natural coastal hazards, flooding, and sea-level rise without requiring artificial shoreline stabilization or physical protection works. Furthermore, because the project requires no civil infrastructure upgrades, no effluent discharge, and no new stormwater outlets directed toward the river corridor, it prevents adverse hydrological or water quality impacts, safeguarding the ongoing functional integrity of the Breede River Estuary.

4. Biodiversity

4.1.	Were specialist studies conducted?	YES X	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		
Jan-Hendrik Keet – EcoFloristix Specialist Botanical Survey			
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		

A number of systematic conservation planning tools and biodiversity informants were consulted to guide the siting and layout of the proposed development. Desktop information was verified at site level by the appointed botanical specialist on a field survey conducted on 29 July 2026. The findings of that assessment are integrated below.

National Vegetation Map

The National Vegetation Map (2024) indicates that the property overlaps Potberg Ferricrete Fynbos (FFf 2), Eastern Rûens Shale Renosterveld (FRs 13) and a small portion of Cape Lowland Alluvial vegetation (Aza 2). Ground-truthing by the specialist confirmed that only Potberg Ferricrete Fynbos occurs on site, including within the proposed development footprint. The remaining two vegetation types were not found.

Potberg Ferricrete Fynbos is classified as Critically Endangered in terms of the Red List of Ecosystems (2021). Approximately 47.8% of its historic extent remains (± 1 940 ha of ± 4 057 ha), largely owing to cultivation and alien plant invasion.

National Biodiversity Assessment (NBA 2018) and National Protected Area Expansion Strategy

The NBA 2018 informs the ecosystem threat status referred to above. The NBA 2018 also categorises the Breede Estuary as Vulnerable and as a high priority for formal protection. According to the NPAES dataset, the property does not fall within or near any NPAES focus area. The closest, the Agulhas focus area, is ± 12.6 km to the south-west. No formally protected area occurs on or adjacent to the property. The Gouritz Cluster Biosphere Reserve is located ± 0.3 km to the north and will not be affected. The proposed development will therefore not compromise any NPAES target.

Western Cape Biodiversity Spatial Plan (WCBSP, 2023)

The WCBSP (2023), together with its accompanying handbook, maps the property predominantly as Critical Biodiversity Area 1 (CBA1: Terrestrial). The associated land management objective is to maintain the remaining habitat in a natural condition, with no further loss of habitat, and transformation is to be avoided wherever a reasonable alternative exists. The specialist verified the provincial mapping on site and found it to be broadly accurate but subject to site-level errors. The CBA1 mapping overlaps existing infrastructure and a large area that was cleared prior to August 2009, invaded by *Acacia cyclops* and subjected to alien clearing in early 2022. The truly natural vegetation in the western portion of the property is not classified in the provincial dataset. The recovered secondary vegetation in the central portion is better classified as CBA2 or Ecological Support Area 1 (ESA1). The fragment directly south of the existing boathouses is better classified as an Ecological Support Area, given its disturbance history, proximity to infrastructure and edge effects. The specialist accordingly produced a corrected CBA map (**Figure 5),** which was adopted as the basis for the layout of the proposed development.



Figure 4: Critical Biodiversity Area 1 (CBA1) as mapped by the WCBSP (2023).

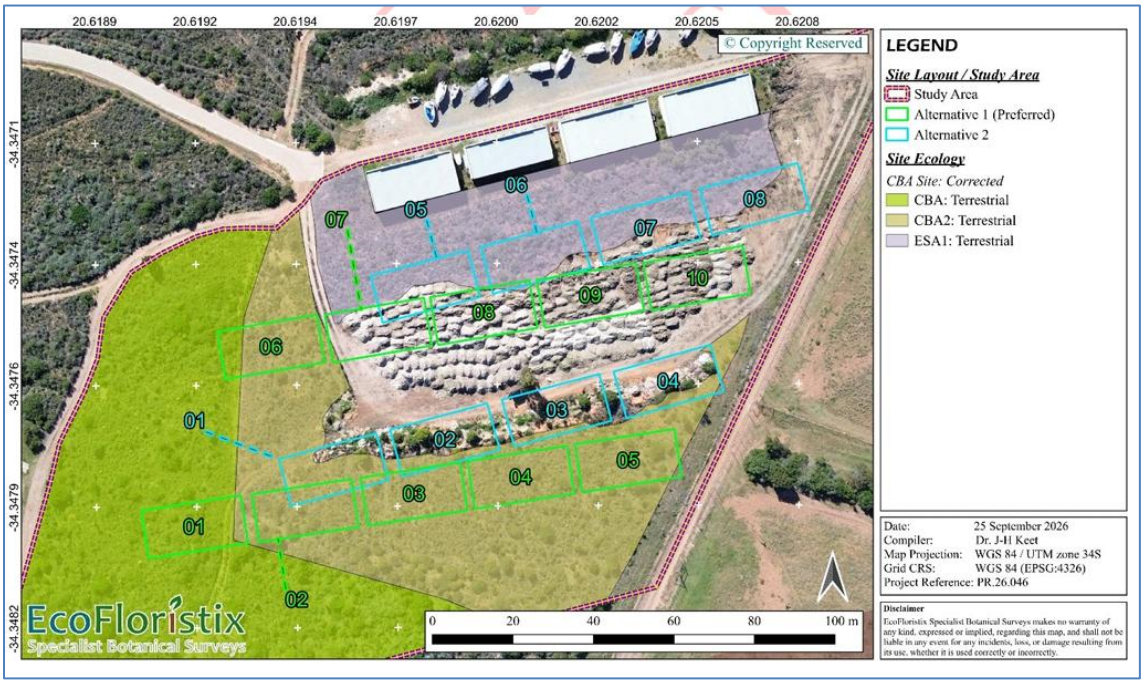


Figure 5: Critical Biodiversity Areas within the study area as indicated by the botanical specialist.

National Freshwater Ecosystem Priority Areas (NFEPA) and Cape Farm Mapper

The Cape Farm Mapper and the NFEPA dataset were consulted to determine whether any wetlands or drainage lines are present on or adjacent to the proposed development site. Desktop mapping did not identify any wetlands or watercourses within the proposed development footprint. Two non-perennial drainage lines are mapped elsewhere on the broader property; however, the proposed structures are located more than 32 m from the edge of these features. The property overlaps a River FEPA and its associated quaternary catchment, as well as a small part of an NFEPA river, in respect of the Breede River. It does not overlap any Strategic Water Source Area. The

specialist did not observe any important hydrological features on the property and, given the small scale of the proposed footprint, considers it highly unlikely that the proposed activities will have a major impact on any hydrological feature.

Botanical specialist findings

The botanical specialist recorded a total of 96 plants species onsite, of which 92 are indigenous and 4 alien species as well as 16 plants species that are protected. A total of 9 plants SCC has been observed onsite, Adenandra *gummifera*, *Agathosma foetidissima*, *Agathosma minuta*, *Aspalathus rosea*, *Drosanthemum autumnale*, *Hermannia lavandulifolia*, *Ixia capillaris*, *Massonia setulosa* and *Selago ramosissima*. The unpublished entity *Serruria* "ludwigii" was also recorded. The alien species recorded were *Acacia cyclops*, *A. mearnsii*, *A. saligna* and *Eucalyptus conferruminata*, none of which occurs in high abundance.

Two vegetation categories, both of which conform to Potberg Ferricrete Fynbos vegetation type were identified by the botanical specialist. The natural (primary) community in the western portion of the property that has never been cleared and has experienced minimal past disturbance. This portion has been assigned a Site Ecological Importance of Very High. The secondary community in the central portion has regrown following disturbance that occurred before August 2009. This area was assigned a Site Ecological Importance of Medium. Highly degraded and transformed areas, including existing infrastructure, cleared ground and rubble, are considered to have a Very Low Site Ecological Importance.

Most of the individual plant species of conservation concern occur outside the proposed development footprint area, with the exception of *Agathosma foetidissima*, which occurs in high abundance across the secondary community, such that the loss of some individuals cannot be avoided. The specialist considers this acceptable in view of the species' abundance and list demonstrated recolonisation of the previously disturbed ground. A single individual of the nationally protected tree *Sideroxylon inerme* subsp. *inerme* occurs outside both footprints and must be protected during construction.

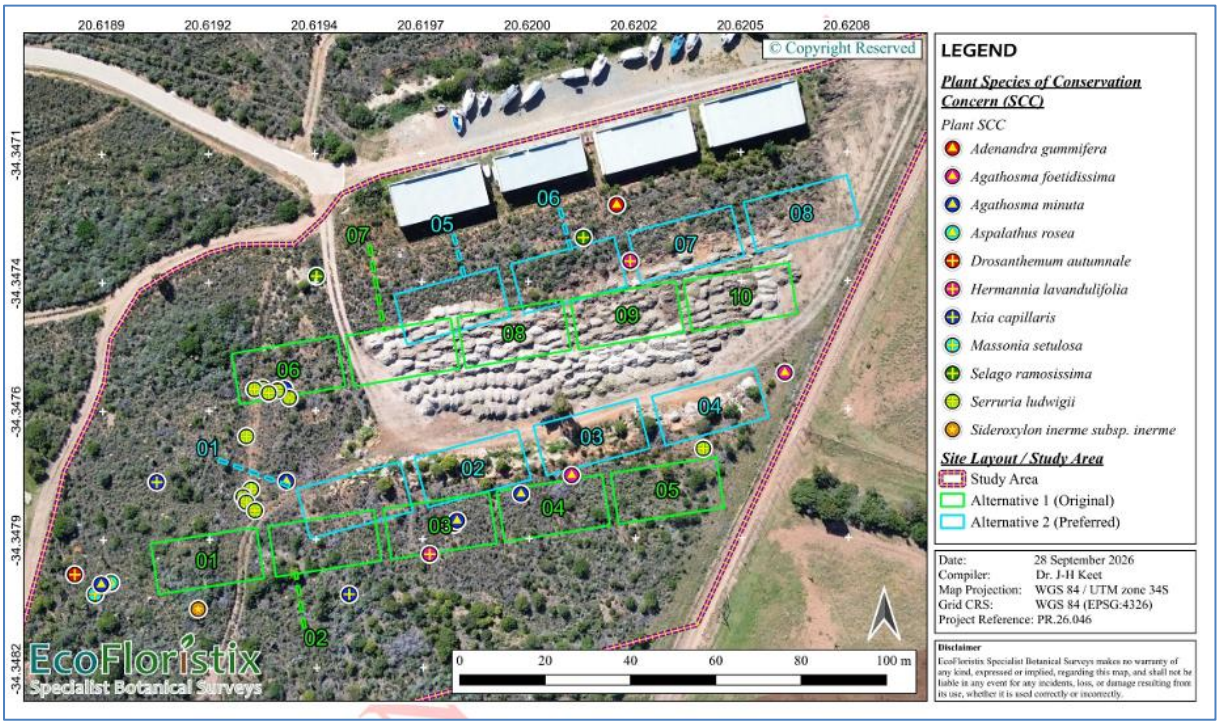


Figure 6: Localities of plant Species of Conservation Concern (SCC) that were observed within the study area. ***Source;*** (Keet, 2026).

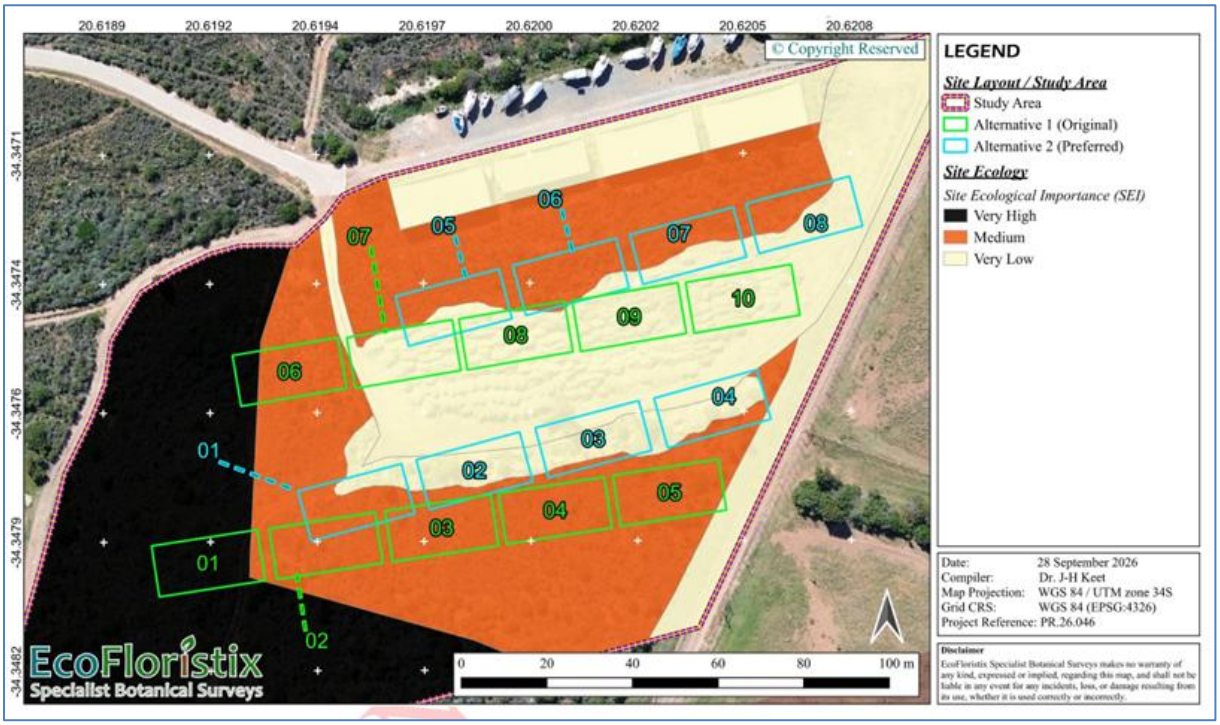


Figure 7: Site Ecological Importance mapping.

Influence on Layout Design

Based on the specialist assessment, the natural western fragment of the Potberg Ferricrete Fynbos vegetation was identified as the most sensitive feature of the property. Two layout alternatives have been assessed by the botanical specialist, including the original layout (Alternative 1) proposed by the applicant as well as Alternative 2 (Preferred) which was recommended by the botanical specialist. Under Alternative 1, comprising ten blocks, the impact would result in the loss of 0.1825 ha of Potberg Ferricrete Fynbos, comprising 0.0334 ha of natural vegetation and 0.1491 ha of secondary vegetation, and would affect *Serruria* "ludwigii" and a greater number of SCC individuals. Alternative 2, comprising eight blocks, was specifically optimised to avoid all-natural vegetation. It limits vegetation loss to 0.1139 ha of secondary vegetation, with a further 0.1261 ha falling on critically modified (0.0662 ha) and seriously modified (0.0599 ha) land, and it almost entirely avoids the loss of Endangered SCC.

In accordance with the mitigation hierarchy, avoidance was prioritised in the design of the layout. Preference was given first to transformed areas and then to secondary vegetation, while intact natural vegetation is excluded entirely. The specialist rates the impacts of Alternative 2 as Low after mitigation in respect of the loss of plant communities, the loss of SCC and the cumulative impacts on conservation targets and broad-scale ecological processes. The specialist therefore concludes that no fatal flaws are evident and that Alternative 2 is the recommended and supported layout, subject to conditions. These are that the natural western fragment be treated as a No-Go area; that clearing be limited to the approved footprint; that permits be obtained from the relevant competent authority before any SCC or protected species are damaged, destroyed or relocated; that a long-term alien plant management and monitoring programme be implemented, including at least three follow-up treatments; and that disturbed areas outside the footprint be rehabilitated with locally occurring indigenous species. Given the Low residual impact, the specialist considers a biodiversity offset unnecessary.

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

According to the Western Cape Biodiversity Spatial Plan (WCBSP 2023), the subject property is broadly mapped as overlapping with a Critical Biodiversity Area 1 (CBA1: Terrestrial). However, desktop analyses and detailed ground-truthing by the botanical specialist revealed that the WCBSP (2023) CBA layer contains spatial inaccuracies, intersecting directly with existing infrastructure on the subject property as well as a large, disturbed area and adjacent farmland on the western boundary. In terms of the WCBSP (2023), CBA1 areas represent irreplaceable biodiversity features that must be maintained in a natural or near-natural condition to meet conservation targets and sustain ecosystem functioning. The primary land management objective applicable to CBA1 is to avoid any further transformation of natural habitat and to actively manage remaining natural habitat against threats such as invasive alien plant species, uncontrolled fires, and encroachment.

In order to align the development with the WCBSP objectives, the botanical specialist conducted a Site Sensitivity Verification (SSV) to ground-truth and refine the site's CBA classification (refer to **Figure 5** above). The verification highlighted that an intact primary fragment of Potberg Ferricrete Fynbos in the western portion of the study area which had been omitted from the WCBSP classification dataset contains high-sensitivity vegetation harbouring Species of Conservation Concern (SCC) and should formally be designated as CBA1. As a result, this area of the site has been given a SEI score of Very High and is identified as a No-go area (**Figure 6**). Conversely, areas that underwent historical vegetation clearing and alien plant invasion, but have since recovered secondary vegetation cover, were reclassified as CBA2 or ESA1 to reflect their secondary nature. Furthermore, the area located directly south of the existing boat garages was designated as ESA2 (or ESA1) given its past disturbance history, proximity to infrastructure, pronounced edge effects, and isolated nature compared to other natural fragments.

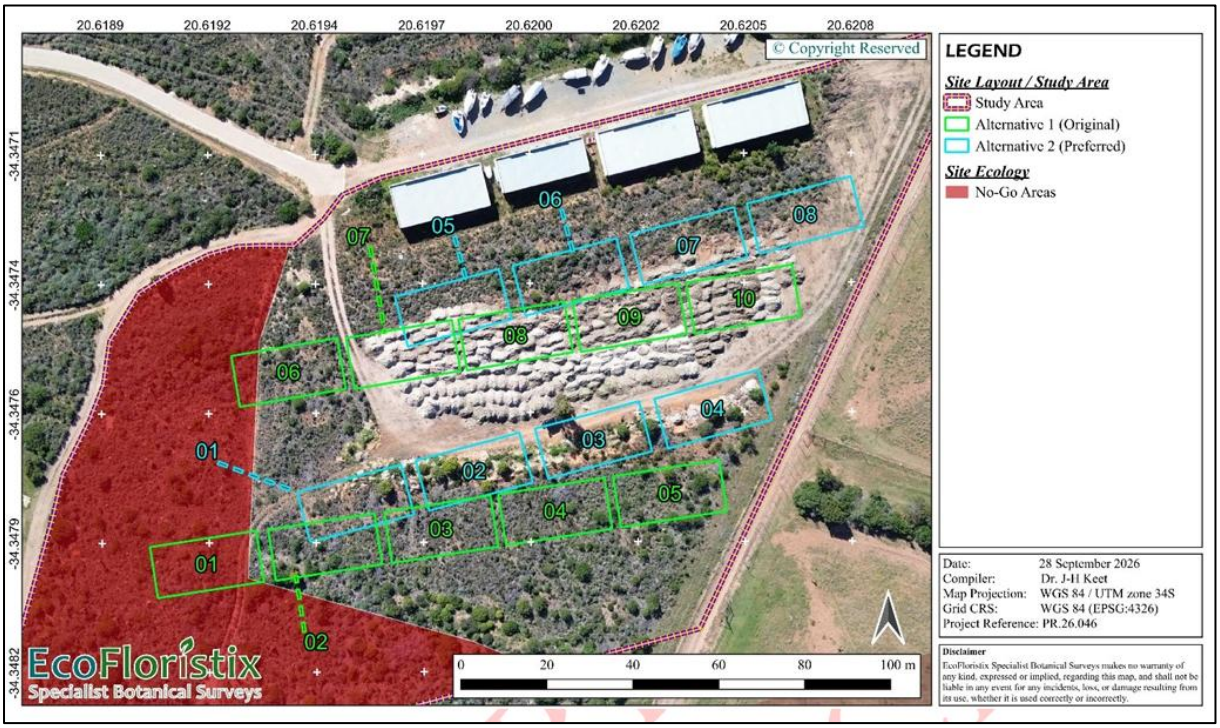


Figure 8: Areas identified as a No-go in the botanical specialist report.

The refined CBA mapping and associated WCBSP land management guidelines directly influenced the spatial planning and layout optimization of the proposed development. Rather than placing infrastructure within irreplaceable natural habitat, the preferred layout (Alternative 2) completely avoids the verified CBA1 fragment in the western section. Instead, Alternative 2 directs the proposed garage footprints into transformed, heavily

modified, or secondary habitat zones (classified as CBA2, ESA1, or ESA2). Siting the development within degraded and alien-infested footprints upholds the WCBSP objective of avoiding primary CBA1 habitat transformation while facilitating active invasive alien plant clearing and ongoing site management to restore overall ecological functionality.

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

The proposed Boat Garage Park on Portion 6 of Farm Stoffels Rivier No. 494 is located within an area mapped as Critical Biodiversity Area 1 (CBA1: Terrestrial) under the Western Cape Biodiversity Spatial Plan (WCBSP, 2023). The potential impacts of the proposed development on the three key site-specific BSP features Landscape Functionality, Critical Biodiversity Area status, and Vegetation Cover are assessed below, together with an explanation of how these considerations have influenced the proposed development.

Landscape Functionality

In the context of the WCBSP, Landscape Functionality refers to the capacity of the broader landscape to sustain ecological processes, including pollination, seed dispersal, hydrological regulation, and connectivity between remnant habitat patches. The subject property is situated within a sensitive ecological transition zone between the Breede River corridor (mapped as a FEPA river and estuarine functional area) and the surrounding Potberg Ferricrete Fynbos and Rûens Renosterveld landscape. The proposed development will result in the permanent transformation of the landscape under the footprint to accommodate eight additional boat storage blocks. However, spatial planning for the preferred layout (Alternative 2) explicitly preserves landscape functionality by clustering these new blocks directly alongside the four existing boat garage blocks and utilizing established internal access tracks. The vast majority of the footprint falls within historically disturbed, alien infested area that currently contributes negligibly to landscape connectivity or ecosystem functioning. While the development (Alternative 2) involves a minor extension into a small patch of recovering indigenous vegetation and bare ground, the design avoids fragmenting the broader terrestrial-aquatic movement corridor. Furthermore, by maintaining a setback of more than 245 meters from the Breede River Estuary and more than 32 meters from all mapped non-perennial drainage lines and wetlands, the development ensures that landscape hydrological processes and riparian corridors remain completely undisturbed.

Key Biodiversity Priority Areas

According to the Western Cape Biodiversity Spatial Plan (2023), the proposed development site falls within Critical Biodiversity Area (CBA1; terrestrial). The primary management objective for CBA1 (Terrestrial) under the WCBSP is to maintain the land in a natural or near-natural state with no further loss of intact habitat, ensuring that any development within this area be low-impact and biodiversity-sensitive. The botanical specialist ground truthing through site verification confirmed a clear distinction between the desktop mapping and the actual ground ecological condition. The proposed development area consists predominantly of areas that have been heavily degraded by historical infestations of alien vegetation, particularly *Acacia cyclops* (Rooikrans), with scattered occurrences of *Acacia saligna* and *Eucalyptus conferruminata*, as well as physical disturbance associated with existing informal jeep tracks. In accordance with the WCBSP guidelines, the classification of the site as a Critical Biodiversity Area (CBA) directly influenced the project design by confining the proposed development footprint primarily to already modified and degraded areas. This approach minimises further degradation and disturbance within areas supporting relatively intact natural vegetation.

Vegetation cover

The proposed development footprint is underlain by Potberg Ferricrete Fynbos, a vegetation type categorised as Critically Endangered in the Revised List of Terrestrial Ecosystems that are Threatened and in Need of Protection

(2022). Field ground-truthing and Site Sensitivity Verification (SSV) conducted by the botanical specialist confirmed that the broader property supports a heterogeneous mosaic of vegetation conditions. While an intact, climax primary natural fynbos patch occurs on the western portion of the property, large sections of the central corridor targeted for development have been substantially modified by past anthropogenic disturbance. These past disturbances include complete disturbance of vegetation prior to 2009, dense infestations of invasive alien trees (*Acacia cyclops* cleared in 2022), and emergency stockpiling of river sand following the May 2026 Breede River flood event.

Under Preferred Alternative 2, direct habitat transformation is strictly confined to 0.1139 hectares of secondary recovered vegetation (CBA2/ESA1) and maximizes the utilization of 0.1261 hectares of critically and seriously modified land (ESA2/transformed). By concentrating development within previously disturbed ground, consolidating new blocks against existing built garage structures, and preserving irreplaceable primary natural fynbos, Preferred Alternative 2 minimizes habitat loss and fragmentation while reducing residual ecological impacts to a Low significance level.

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

The subject property is not located within a protected area.

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

The botanical specialist ground-truthing confirmed that the actual development footprint is restricted to historically disturbed, secondary vegetation and modified ground (including May 2026 flood sediment stockpiles) directly adjacent to existing boat garage infrastructure. The primary natural Potberg Ferricrete Fynbos patch on the western section of the property which provides higher-quality natural habitat and foraging cover for indigenous wildlife is completely avoided under Preferred Alternative 2 and designated as a permanent No-Go conservation zone. The avoidance of this intact fragment maintains local ecological corridors and prevents the fragmentation of faunal habitat.

5. Geographical Aspects

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

Topography and Slope

The property is characterized by gently undulating to moderately sloping terrain that descends northward toward the Breede River corridor. To account for topography and avoid dynamic hydrological risks, the proposed development footprint is deliberately situated entirely above 45m geographical contour line. Siting of the development above this elevation ensures that the structures are located well outside low lying flood prone areas and the riparian transition zone, preventing flood exposure during extreme flow events.

Watercourses and Drainage

Hydrological and aquatic features represent the most critical geographical considerations on the property, given that the Breede River forms the northern boundary and is mapped as a Freshwater Ecosystem Priority Area (FEPA) river, a Critical Biodiversity Area (CBA: River/Estuary), and an Estuarine Functional Zone (EFZ) carrying Very High aquatic biodiversity sensitivity. While two non-perennial drainage lines and a wetland are mapped on the broader property, spatial verification confirms that the development footprint does not intersect with any watercourse or wetland feature. All proposed garage structures maintain a setback of more than 32 meters from these non-

perennial drainage lines and wetlands present on the subject property. Consequently, the project involves no infilling, bed or bank excavation, or abstraction of surface water.

Agricultural Land

The property is zoned Agricultural Zone 1 and is surrounded by agricultural land, particularly to the east where cultivated fields are visible on aerial imagery. Although the national screening tool reflects a High sensitivity rating for agriculture due to regional crop cultivation, field verification confirms that the development footprint does not utilise any actively cultivated land or high-value soils. The selection of the preferred layout (Alternative 2) was heavily influenced by agricultural preservation and land-use efficiency, confining the eight new storage blocks directly adjacent to the four existing boat garage blocks within a historically disturbed, alien dominated area (*Acacia cyclops*). By clustering the infrastructure within an already modified precinct, the proposed activity prevents the fragmentation of surrounding agricultural land, avoids transforming productive agricultural soil, and maintains full alignment with the surrounding mixed agricultural and riverine land-use character.

6. Heritage Resources

6.1.	Was a specialist study conducted?	YES	NO x
6.2.	Provide the name and/or company who conducted the specialist study.		
N/A			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
There are no sensitive heritage resources that will be affected by the proposed development. The proposal includes the construction of additional boat garage blocks adjacent to the existing garages. The character of the site will not be altered.			

7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.
Based on the scope of the development, it does not trigger the requirements set out under the National Heritage Resources Act (NHRA), which are described as below. Section 38 of the Act states as follows: *38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as-* (a) *the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length* **– Not applicable** *(b) the construction of a bridge or similar structure exceeding 50m in length; –* **Not applicable** *(c) any development or other activity which will change the character of a site-* *(i) exceeding 5 000 m2 in extent; or –* **Not applicable** *(ii) involving three or more existing erven or subdivisions thereof; or –* **Not applicable**

(iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or – **Not applicable**

(iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority; – **Not applicable**

(d) the re-zoning of a site exceeding 10 000 m² in extent; or– **Not applicable**

(e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development. – **Not applicable**

The proposed development footprint is limited in extent and confined to shallow foundation excavations required for the boat garage structures, situated adjacent to the existing Boat Garages. Given the limited depth and extent of excavation required, and that no fossil-bearing outcrops or exposures have been identified on the site, it is motivated that no further specialist palaeontological assessment is required, subject to the inclusion of standard chance-fossil-finds procedures in the EMPr in the event that fossil material is exposed during construction. Given the above it is confirmed that no further Heritage application is required or applicable.

8. Socio/Economic Aspects

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

The proposed development is located on Portion 6 of Farm Stoffels Rivier No. 494, situated south of Malgas along the Breede River, within the jurisdictional area of the Swellendam Local Municipality (SLM). The SLM falls within the Overberg District Municipality (ODM) in the Western Cape Province. The Swellendam Local Municipality is the largest local municipality in the Overberg District, covering an area of 3,835 km^2 and accounting for approximately one third of the district's total geographical area. According to the 2022 South African Census, the municipality had a total population of 47,114 people. The average population growth rate is relatively restrained, with annual growth of approximately 1.0 per cent expected between 2022 and 2027.

Malgas and Stoffels Rivier

Malgas is a small settlement located on a pontoon ferry crossing on the Breede River, the last crossing of the river before it reaches the ocean. The settlement had a recorded population of 44 people in the 2011 Census, with Afrikaans being the predominant first language (74.4%) and the racial composition reflecting a mix of Coloured (50.0%), White (38.6%), and Black African (11.4%) residents. The surrounding Stoffels Rivier area is characterised by a dispersed, low-density rural residential and recreational population, with permanent residents being limited in number. The area is predominantly privately owned, with properties used for a combination of agricultural, residential, and leisure/recreational purposes

Tourism and Recreation Economy

The Breede River corridor in the vicinity of Malgas and Stoffels Rivier supports a well-established river-based recreational and tourism economy. The southern bank of the Breede River is lined with holiday homes that have boat jetties and motorboats to support the riverine lifestyle characteristic of the area, and many holiday rentals are available for visitors. Recreational activities associated with the Breede River include fishing, boating, swimming, water skiing, and stand-up paddle boarding, making the river corridor a popular family holiday destination. The area is particularly valued for fishing and birdwatching, as the Breede River estuary sustains an

abundance of fish species, including Cob, Spotted Grunter, and Garrick, and attracts fish eagles, ospreys, fish owls, and kingfishers.

Malgas is also known as one of the few places in the world where a hand-drawn pontoon cable ferry still operates, a heritage feature that draws visitors to the area and contributes to the local tourism economy.

Relevance to the Proposed Development

The existing social and economic characteristics of the Stoffels Rivier and Malgas area are directly relevant to the proposed Boat Garage Park. The area's established river-based recreational economy, characterised by boat ownership and water-based leisure activities among both permanent residents and seasonal visitors, creates a demonstrated local demand for secure, dedicated boat storage facilities in close proximity to the Breede River. The four existing storage garages on the property are already operating in response to this demand. The proposed addition of further garage blocks directly supports the recreational and tourism economy of the area by providing additional secure storage capacity for boats used in the river corridor.

The proposed development is not anticipated to have any negative impact on the existing social character of the Stoffels Rivier community. It does not introduce any industrial activity, additional permanent residential population, or land use incompatible with the existing agricultural, residential, and recreational character of the area. Construction employment will provide a short-term localised economic benefit, and the operational phase of the development will contribute modestly to the local economy through rates and service payments to the Swellendam Local Municipality.

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

The proposed Boat Garage Park is anticipated to generate a number of positive socio-economic contribution at local, municipality and regional level, both during construction and post-construction phase:

Construction phase

The construction of the eight (8) proposed storage garage blocks and associated infrastructure will generate short-term localised employment opportunities. Construction activities, including site preparation, foundation work, structural erection, and internal road and yard surfacing, will require both skilled and unskilled labour. Where possible, it is proposed that the applicant prioritise the employment of workers from the, Stoffels Rivier, Malgas and broader Swellendam Local Municipality area, in line with the principles of local economic development (LED) promoted under the Swellendam Local Municipality Integrated Development Plan (IDP). The procurement of construction materials, plant hire, and associated services will further stimulate economic activity in the regional supply chain.

Post-construction phase

Economic contribution through recreational tourism support

The Breede River corridor in the vicinity of Malgas and Stoffels Rivier supports a well-established recreational economy centred on boating, fishing, water skiing, and river-based leisure activities. Boat ownership among both permanent residents and seasonal visitors to the area is a significant feature of this recreational economy. The proposed Boat Garages directly supports this existing economic activity by providing secure, dedicated, and conveniently located storage facilities for privately owned boats, reducing the logistical burden on boat owners who would otherwise be required to transport or store vessels at more distant locations. By making it easier and more practical for recreational users to keep and maintain boats in the area, the development indirectly supports

the broader tourism and hospitality economy of the Malgas and Stoffels Rivier area, including accommodation establishments, fishing and boat charter operators, and the local retail and hospitality sector.

Revenue and rates contribution

The proposed development will result in a new rateable improvement on the property, contributing to the Swellendam Local Municipality's rates base. The rental income generated by the boat storage blocks will remain within the local and regional economy, with the applicant being a private individual with established ties to the Stoffels Rivier area.

Property value and investment

The formalisation of the boat storage uses through the environmental authorisation process, combined with the improved infrastructure represented by the new garage blocks, is anticipated to enhance the value of the property and contribute positively to investment confidence in the Stoffels Rivier area. The proposed development demonstrates private sector investment in well-located recreational infrastructure that complements the established character of the Breede River corridor.

Social Contribution

The proposed development does not introduce any change in the residential or social character of the Stoffels Rivier community. It does not result in any displacement of existing residents or users, and it does not introduce activities that are incompatible with the existing rural residential and recreational land use pattern of the area. The provision of additional secure boat storage contributes to the safety and security of privately owned vessels in the area, reducing the risk of theft or vandalism associated with unsecured outdoor storage.

The proposed development further supports a recreational lifestyle that is central to the social identity of the Malgas and Stoffels Rivier community and its seasonal visitor population, contributing to the quality of life of residents and visitors who participate in river-based recreational activities along the Breede River corridor.

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

N/A

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

The proposed development on Portion 6 of the Farm Stoffels Rivier No. 494, Stoffels Rivier, Malgas, involves the construction and operation of eight (8) new boat garage blocks (comprising 40 individual storage blocks) within an overall layout envelope of approximately 1.3 ha. The property currently supports residential dwellings, four (4) existing boat garage blocks, internal gravel access roads, and informal tracks, accounting for an existing developed footprint of approximately 11.52 ha out of the total 51.92 ha property extent.

Potential impacts on human health, well-being, visual aesthetics, and local sense of place were evaluated across both the construction and operational phases to ensure full alignment with sustainable development principles and the Environmental Management Programme (EMPr).

Noise

Construction Phase:

Construction activities will generate temporary noise impacts associated with the use of machinery, power tools, vehicles, and on-site labour. These impacts are inherently short-term and will be limited to the construction period. In order to minimise disturbance to surrounding residents and the natural character of the area, construction activities will be restricted to standard working hours (Monday to Friday, 07:00 to 17:00, and Saturday, 07:00 to 13:00), in compliance with the noise control provisions of the applicable municipal by-laws and the requirements of the National Environmental Management Act, 1998 (NEMA). No night-time or Sunday construction activities are proposed. These measures will be incorporated as binding conditions in the Environmental Management Programme (EMPr).

Operational Phase:

The proposed development involves boat storage only. No mechanical workshops, boat maintenance activities involving power tools or machinery, or other noise-generating operational activities are proposed. The movement of vehicles and trailers accessing the storage units will generate occasional low-level traffic noise, consistent in character and intensity with existing vehicle movements on the property. No significant operational noise impacts are anticipated.

Dust

Construction Phase:

Earthworks associated with site preparation, foundation excavation, and internal road construction will generate temporary dust emissions, particularly during dry and windy conditions. Dust suppression measures, including the watering of exposed surfaces and the limitation of stockpile heights, will be implemented during construction and incorporated into the EMPr. Given the low-density and dispersed settlement pattern of the Stoffels Rivier area, the potential for dust to affect surrounding residents is considered low, provided standard dust suppression measures are applied.

Operational Phase:

No operational dust impacts are anticipated. The internal access roads and boat storage yard will be surfaced or stabilised to minimise dust generation from vehicle and trailer movements.

Odours

The proposed development does not involve any activities that will generate odours. No fuel storage, waste processing, ablution facilities, effluent treatment, or food preparation activities are proposed in association with the boat storage use. No odour impacts are anticipated during either the construction or operational phases of the development.

Visual Character and Sense of Place

Construction Phase:

The construction phase will temporarily alter the visual character of the proposed development area through the presence of construction plant, materials stockpiles, and partially completed structures. These impacts are short-term and will be resolved upon completion of construction.

Operational Phase:

The proposed storage garages are single-storey, utilitarian structures consistent in scale and character with the four existing storage garages already present on the property. The proposed garage blocks will be positioned adjacent to and in visual continuity with the existing garage structures, ensuring that the development reads as an incremental extension of an established use rather than a visually discordant new element in the landscape. The development area is situated above the 45 m contour line and is partially screened from the Breede River corridor by existing vegetation. The dominant visual character of the broader Stoffels Rivier area, which is defined by the Breede River, surrounding agricultural lands, and indigenous fynbos and renosterveld vegetation, will not be materially altered by the proposed development.

The proposed development layout, as refined through the botanical specialist's Site Sensitivity Verification process, preserves the intact vegetation patches identified on the site. The retention of these patches contributes positively to the visual and ecological character of the development area and provides a degree of natural screening between the proposed structures and the surrounding landscape.

Sense of Place

The Stoffels Rivier and Malgas area is characterised by a strong sense of place rooted in its river-based recreational lifestyle, agricultural landscape, and relatively undisturbed natural environment. The proposed boat storage use is entirely consistent with this established character, given that boating and river recreation are central to the social identity of the area. The proposed development formalises and expands an existing storage facility that already serves the local boating community and does not introduce any land use that is foreign to or incompatible with the established sense of place of the Stoffels Rivier corridor.

Light Pollution

The proposed development is a storage facility only and is not anticipated to require significant external lighting beyond basic security lighting. Should security lighting be installed, it will be directed downward and inward toward the structure to minimise light spillage into the surrounding natural environment and toward the Breede River corridor, consistent with dark sky principles applicable in rural areas. Lighting specifications will be incorporated into the EMPr.

Traffic and Access

The proposed development will not generate significant additional traffic. Vehicle movements will be limited to the occasional delivery and retrieval of privately owned boats by trailer, which is consistent in character with existing traffic patterns on the property and the surrounding access roads. No public road upgrades or traffic management interventions are required as a result of the proposed development.

Conclusion

The proposed Boat Garage blocks are not anticipated to result in any significant negative impacts on the health and well-being of surrounding residents or the broader Stoffels Rivier community during either the construction or operational phases. The temporary construction phase impacts primarily noise and dust are manageable through standard mitigation measures that will be incorporated into the EMPr. The operational phase introduces no noise, odour, visual, or sense-of-place impacts that are incompatible with the existing character of the area. The proposed development has been influenced by these health and well-being considerations in its siting, layout design, and proposed operational restrictions, as described above.

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. Details of the alternatives identified and considered

1.1.	Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred property and site alternative.

The subject property, Portion 6 of the Farm Stoffels Rivier No. 494, situated in Stoffels Rivier south of Malgas within the Swellendam Local Municipality, Western Cape Province, is presented as the sole preferred site alternative for the proposed Boat Garage blocks development. The property measures approximately 51.92 ha in extent and is partially developed, accommodating existing residential dwellings, an existing Boat Garage blocks comprising four (4) storage garages, a boat storage yard, and existing service infrastructure including access roads and informal jeep tracks.

No Alternative Properties Considered

No alternative properties or sites were considered for the proposed Boat Garage blocks. This is motivated on the following basis: the applicant holds a legal interest only in Portion 6 of Farm Stoffels Rivier No. 494, and the proposal is specifically intended to extend and complement existing boat storage infrastructure already present on this property. The proposed development entails the construction of eight (8) additional boat storage garage blocks to be located directly adjacent to the existing four garage structures, thereby consolidating the boat storage use within a single, defined node on the property rather than introducing a new development footprint on an undisturbed portion of the site or on an alternative property.

Site History and Current Conditions

Field investigations and historical satellite imagery analysis confirm that the specific footprint selected for the development has a well-documented history of prior anthropogenic disturbance. Analysis of historical satellite imagery indicates that a substantial portion of the central study corridor was completely cleared of natural vegetation prior to August 2009. Following this initial mechanical disturbance, the central area experienced dense infestation by invasive alien plant (IAP) species, predominantly *Acacia cyclops* (Rooikrans), alongside scattered occurrences of *Acacia saligna* (Port Jackson) and *Eucalyptus conferruminata* (Spider Gum). Targeted alien clearing operations were undertaken across this footprint in early 2022, leaving the central corridor in a recovering secondary state (refer to **Figure 9** – **Figure 13** below).

The ecological condition of the central corridor was further modified following a severe flood event along the Breede River in May 2026. Flood waters inundated residential dwellings and estate infrastructure, depositing significant volumes of river sand and silt. As an emergency flood response to restore access and safety, the excavated sediment was stockpiled across the central already degraded corridor. Because this corridor was already degraded following prior alien clearing, no indigenous vegetation was cleared to accommodate the flood sand stockpiles. The botanical specialist ground-truthing confirmed the absence of stockpiled vegetation material, verifying that sediment deposition was confined strictly to an already disturbed footprint rather than intact indigenous vegetation. Currently, only the western section of the property supports a truly natural, climax vegetation fragment, while the central corridor consists of secondary recovering vegetation and modified ground. This western portion has been identified as a No-go and is excluded from the proposed development.



Figure 9: 2020 Google Earth Aerial Imagery.



Figure 10: 2021 Aerial imagery.



Figure 11: March 2022 – Aerial imagery shows that the proposed area proposed for the construction was previously infested with alien vegetation which has been cleared.



Figure 12: The 2022 aerial imagery shows the proposed site was previously covered in alien vegetation and as a result it was cleared.



Figure 13: The aerial imagery shows that the proposed site was covered in alien vegetation which appeared to have been cleared in March 2022.

Integration with Botanical Sensitivity Mapping

Desktop spatial datasets under the South African National Vegetation Map (VegMap 2024) map the subject property as underlain by Potberg Ferricrete Fynbos, an ecosystem listed as Critically Endangered (CR). Furthermore, broad provincial mapping under the Western Cape Biodiversity Spatial Plan (WCBSP 2023) designates the general area as Critical Biodiversity Area 1 (CBA1: Terrestrial). However, detailed site ground-truthing conducted by the botanical specialist revealed that broad provincial CBA1 mapping contained inaccuracies, as it mapped historically degraded ground, alien-infested corridors, and flood sediment stockpiles as CBA1.

In accordance with national site sensitivity protocols, the botanical specialist refined the broad desktop Critical Biodiversity Area (CBA) mapping across the study area into three distinct ecological zones. The western section of the property comprises primary natural fynbos featuring intact climax vegetation, high native species richness, and plant Species of Conservation Concern (SCC). This area was verified as true CBA1 with a Very High Site Ecological Importance (SEI) and designated as a strict, No-Go area. The central corridor consists of secondary recovered vegetation that regrew following prior 2009 disturbance and 2022 alien removal. This community was reclassified as CBA2 / ESA1 with a Medium SEI. Lastly, the modified margins comprising existing garage perimeters, cleared tracks, and May 2026 flood sediment stockpiles were reclassified as ESA2 / transformed footprints with a Very Low SEI.

The application of the botanical sensitivity map directly informed the selection and layout optimization of Preferred Alternative 2. While the original proposal (Alternative 1) comprising (10 garage blocks of 50 units) encroached into primary western fynbos causing the direct loss of 0.1825 hectares of vegetation, including 0.0334 hectares of primary CBA1 habitat. The preferred layout (Alternative 2) comprising 8 garage blocks (40 storage units) achieves 100% spatial avoidance of primary natural CBA1 fynbos. Alternative 2 also restricts habitat transformation to 0.1139

hectares of secondary vegetation (CBA2/ESA1) and maximizes the utilization of 0.1261 hectares of modified land (ESA2/transformed). By completely avoiding high sensitivity are designated as a No-Go zone and confining development to previously transformed ground, Alternative 2 (preferred) reduces residual direct and cumulative ecological impacts to a Low significance level, rendering formal biodiversity offsets unnecessary.

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

No other properties or site alternatives were investigated by the applicant either than the subject property, Portion 6 of the Farm Stoffels Rivier No. 494.

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

The subject property, Portion 6 of the Farm 494, is the only property and site alternative available for consideration, as the applicant holds legal title to this property only, and does not have a legal interest in, or control over, any other property that could reasonably accommodate the proposed development. As the proposed Boat Garage blocks expansion is specifically intended to extend and complement the existing Boat Garage blocks situated on Portion 6 of the Farm 494, the identification of alternative properties elsewhere would not be feasible, practical, or relevant to the objectives of the application.

On this basis, a comparative site selection matrix was not undertaken, as such an assessment presupposes the availability of two or more competing property or site alternatives. In the absence of any such alternatives, the preferred site was instead motivated on the basis of the following considerations:

- The applicant's legal tenure is limited to Portion 6 of the Farm 494;
- The property already accommodates an established Boat Garage blocks, residential dwellings, and associated service infrastructure, rendering the site inherently suited to the proposed extension;
- Locating the proposed eight (8) additional boat garages adjacent to the existing four (4) garages consolidates the development footprint within an already partially developed node of the 51.92 ha property, in support of the mitigation hierarchy of avoidance, minimisation, and consolidation of impacts.
- The area proposed is situated more than 100m from the High-Water Mark of the Breede River Estuary and above 5m topographical contour.

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

The process followed to determine the preferred layout and siting of the additional boat garages within Portion 6 of the Farm Stoffels Rivier No. 494 was based on a combination of site inspection findings, existing lawful infrastructure, specialist botanical input, and a comparative assessment of the alternatives considered.

Site Inspection and Contextual Understanding

An initial site visit was conducted by the environmental assessment practitioner(s) to gain a first-hand understanding of the property. This included assessment of the location and extent of existing development comprising residential dwellings, the existing Boat Garage blocks, and associated service infrastructure as well as the property's relationship to the Breede River Estuary and the general biophysical character of the undeveloped portions of the 51.92 ha property.

Site Characteristics Informing the Preferred Location

The area identified for the additional boat garages is situated above 5m contour relative to the Breede Rivier Estuary, placing it outside the applicable riparian setback and rendering it a suitable location for the establishment of storage structures of this nature. The elevated position, combined with the property's direct relationship to the Breede River

Estuary, further supports practical vehicular and pedestrian access to the coast for the purposes for which the structures are intended.

Consolidation of the existing infrastructure

Given that the proposed expansion is intended to extend the existing Boat Garage blocks, the site inspection confirmed that the area immediately adjacent to the existing four (4) garages represented the only logical and practical location for the additional boat garage blocks. This approach was adopted in preference to a dispersed or standalone footprint elsewhere on the property, as it consolidates boat storage infrastructure within a single development node, thereby limiting the overall disturbance footprint and avoiding fragmentation of undeveloped areas.

Botanical Specialist Input

The spatial configuration and micro-siting of the preferred layout (Alternative 2) were directly guided by specialist botanical ground-truthing and Site Ecological Importance (SEI) mapping. Although broad desktop datasets map the subject property as underlain by Potberg Ferricrete Fynbos an ecosystem listed as Critically Endangered (CR) and classified as a Critical Biodiversity Area 1 (CBA1: Terrestrial), field investigations confirmed that the site exhibits significant ecological heterogeneity. The western portion of the site, as mapped by the specialist, consists of an intact primary natural fynbos fragment characterized by climax vegetation, low historical disturbance, and high native species richness, supporting Threatened plant Species of Conservation Concern (SCC) such as *Selago ramosissima* (EN) and *Agathosma minuta* (EN). This primary community was verified as True CBA1 with a Very High Site Ecological Importance (SEI) and designated as a strict, permanent "No-Go" area.

In contrast, the central study corridor represents a secondary recovered plant community that regrew following August 2009 disturbance and early 2022 invasive alien plant clearing (*Acacia cyclops*). The ecological condition of this central corridor was further modified following the emergency stockpiling of river sand excavated from dwellings damaged during the May 2026 Breede River flood event. In accordance with national site sensitivity guidelines, the specialist reclassified this secondary community as CBA2 / ESA1 with a Medium SEI, while existing garage perimeters, cleared tracks, and flood sediment stockpiles represent transformed footprints with a Very Low SEI.

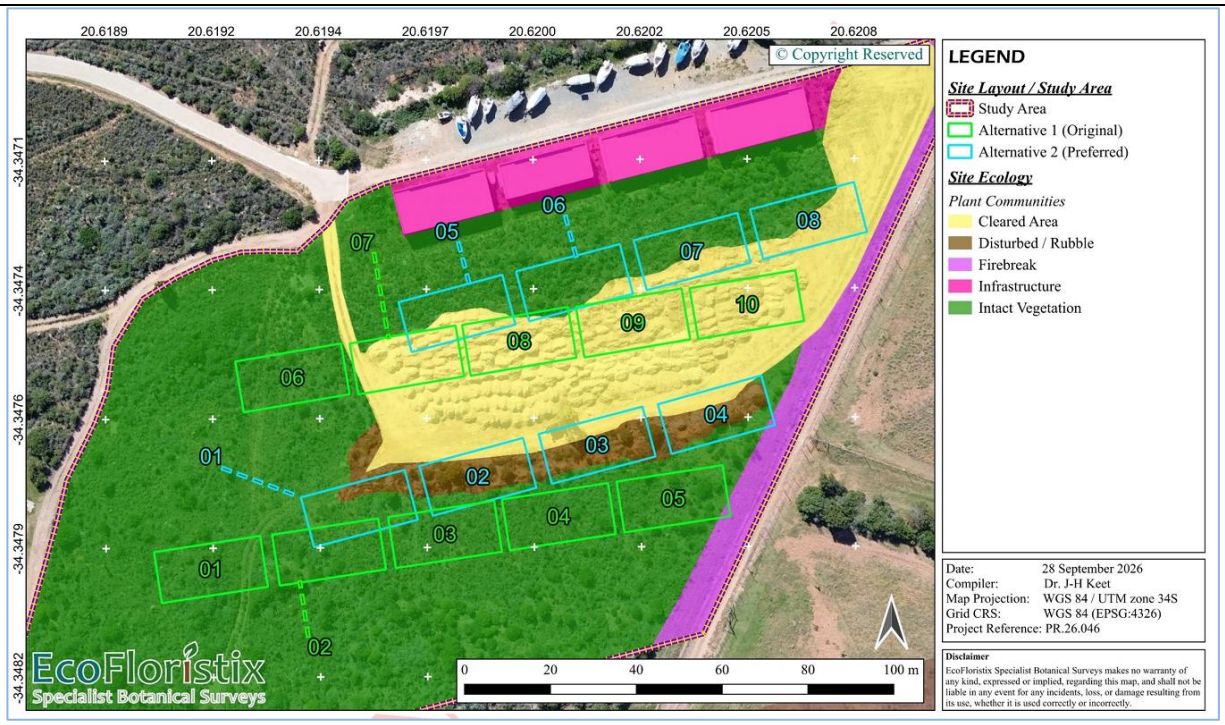


Figure 14: botanical mapping showing areas that have been disturbed on the site as well as intact vegetated areas.

Comparative Assessment of Alternatives

Two development layout alternatives were formally evaluated alongside the Baseline (No-Go) Scenario to determine the most environmentally acceptable spatial configuration for the proposed boat garage expansion on Portion 6 of the Farm Stoffels Rivier No. 494. Initially, Alternative 1 (the original layout proposal) was formulated prior to detailed botanical sensitivity mapping. Alternative 1 proposed the construction of ten (10) boat garage blocks housing a total of 50 individual storage units within a 1.3 ha layout envelope. Because Alternative 1 aligned new garage blocks directly contiguous with existing structures without accounting for underlying botanical sensitivity, it encroached directly into intact primary natural Potberg Ferricrete Fynbos on the western section of the property. This layout would have resulted in the direct transformation of 0.1825 hectares of native vegetation, including 0.0334 hectares of primary natural CBA1 habitat, while impacting individuals of Threatened plant Species of Conservation Concern (SCC). Consequently, Alternative 1 carried a Medium residual ecological impact significance pre- and post-mitigation.

In direct response to these specialist findings, the layout was reconfigured and optimized to establish Preferred Alternative 2. Alternative 2 reduces the scope of development to eight (8) boat garage blocks housing 40 individual storage units within the 1.3 ha development envelope. Alternative 2 shifted all structural footprints eastwards onto degraded ground, achieving 100% spatial avoidance of primary natural CBA1 fynbos. Direct habitat transformation under Alternative 2 is strictly restricted to 0.1139 hectares of secondary vegetation (CBA2/ESA1) and maximizes the utilization of 0.1261 hectares of modified and transformed land (ESA2).

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

No property or site alternatives were considered for the proposed development, and the following motivation is provided in this regard, as required in terms of Appendix 1 of the EIA Regulations, 2014 (as amended). Portion 6 of the Farm 494 is situated directly adjacent to the Breede River Estuary and is the only property in respect of which

the applicant holds legal title. On this basis alone, no other property could reasonably or lawfully have been considered as an alternative site for the proposed development.

Beyond the question of legal tenure, the subject property is also considered the most suitable site for the proposed development on functional and locational grounds. The property already accommodates the necessary existing infrastructure, including residential dwellings, the existing Boat Garage blocks, and associated services, and is well located along the banks of the Breede River Estuary, providing direct and appropriate access to the water body that the proposed boat garages are intended to serve. This locational advantage cannot readily be replicated on an alternative property, as the functional viability of a boat garage facility is inherently dependent on proximity and direct access to the river.

Furthermore, the proposed development does not constitute the establishment of a new land use on the property, but rather the extension of an existing Boat Garage blocks. As such, the consideration of alternative sites elsewhere would not only have been legally and practically unfeasible, given the applicant's limited property holding, but would also have undermined the objective of consolidating boat storage infrastructure within a single, already-developed node, in line with the principles of avoidance and minimisation of environmental impact. Accordingly, it is motivated that Portion 6 of the Farm 494 is the only feasible and reasonable property and site alternative available for the proposed development, and that no further alternatives require consideration.

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

Positive impacts

- The proposed development is well located within the subject property, as it will be situated directly adjacent to the existing Boat Garage blocks, thereby consolidating boat storage infrastructure within an already-developed node rather than introducing a new development footprint elsewhere on the property.
- As the subject property is located adjacent to the Breede River, the proposed Boat Garage blocks (8 additional garage storages) will be situated above the 1:100-year flood line and above 45 m contour, thereby avoiding the flood-prone area associated with the river and reducing the risk of flood-related impacts on the development and the receiving environment.
- The proposed development makes use of existing service infrastructure and access routes already established on the property, thereby limiting the extent of new bulk infrastructure, associated earthworks, and vegetation clearance that would otherwise be required.
- The consolidation of the development within the existing node supports efficient land use management and reduces the cumulative visual and environmental footprint on the broader 51.92 ha property.

Negative impacts

- Loss of natural vegetation and disturbance of soils within the proposed development footprint as a result of vegetation clearance and earthworks associated with the construction of the additional boat garages.
- Potential disturbance to, or displacement of, small fauna occurring within the development footprint during the construction phase.
- Potential for increased surface water runoff and sedimentation into the Breede River Estuary during construction, in the absence of appropriate erosion and stormwater control measures.
- Potential cumulative impact on the visual character of the riverine/rural landscape as a result of the incremental expansion of built infrastructure on the property.
- Potential for increased vehicular activity, noise, and general disturbance in the vicinity of the site during the construction phase.

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

Provide a description of the preferred activity alternative.

The preferred activity alternative involves the establishment of an extension to the existing Boat Garage blocks situated on Portion 6 of the Farm 494, Malgas. Only eight (8) boat garages are included in this application, to be constructed directly adjacent to the existing Boat Garage blocks comprising four (4) storage garages already established on the property. No other alternative activity has been investigated on the subject property in this application.

Provide a description of any other activity alternatives investigated.

No other activity alternatives were investigated. The proposed Boat / storage garage units are the only activity proposed for the storage of boats on Portion 6 of the Farm 494, Malgas, and no alternative land uses or activities were considered by the applicant.

The proposed activity is intended solely to extend the existing Boat Garage blocks already situated on the property and does not present an opportunity for alternative activities to be reasonably considered, given that the purpose of the application is specifically to provide additional storage capacity consistent with the existing use of the property. On this basis, no other activity alternatives were investigated.

Provide a motivation for the preferred activity alternative.

The preferred activity is the construction of a Boat Garage blocks, located adjacent to the Breede River. No alternative activities have been investigated for the proposal, as the establishment of additional boat storage capacity is the specific need being addressed on the subject property.

The activity therefore serves the purpose of establishing an extension to the existing boat garage blocks, ensuring that adequate storage capacity is available for boats on the subject property. It is further noted that the area is recognised as a holiday and recreational destination associated with the Breede River, and the proposed activity is accordingly well suited to this context, making use of the area's existing recreational character through the expansion of the existing, already-established boat garage facility.

Provide a detailed motivation if no activity alternatives exist.

No other activity alternatives exist for the subject property, as the establishment of additional boat storage capacity reflects the applicant's specific and intended use of the property and is inherently tied to its location and existing land use.

The subject property, Portion 6 of Farm Stoffels Rivier No. 494, Malgas, is situated on the riverfront of the Breede River Estuary and already accommodates an existing boat garage blocks comprising four garage blocks. This existing use establishes the baseline activity on the property and confirms that the site's function is and has historically been dedicated to the storage of recreational watercraft in support of boating activity on the Breede River.

The need for additional boat storage capacity has been informed by the seasonal nature of visitation to the Malgas area, which experiences a marked increase in tourists and holidaymakers during peak holiday periods. This seasonal influx has resulted in a corresponding increase in demand for boat storage that the existing four-garage facility can no longer adequately accommodate. The proposed development therefore responds directly to an identified and quantifiable shortfall in existing infrastructure, rather than introducing a new or unrelated land use to the property.

As the proposed activity is directly linked to, and dependent upon, the property's location adjacent to the Breede River and the associated recreational boating activity in the area, no other activity would reasonably address the identified need. An alternative activity one unrelated to boat storage would not respond to the demand that has been identified, nor would it be consistent with the property's established riverfront use. The proposed extension of the existing boat garage blocks is therefore considered the only viable activity to accommodate the identified demand for additional boat storage capacity on the subject property.

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

As indicated above, no other activity alternatives were investigated for the subject property beyond the proposed extension of the existing Boat Garage blocks. The following impacts relate to this activity alternative, informed by the site characteristics and the refined preferred layout (Alternative 2).

Positive impacts

→ The refined preferred layout (Alternative 2) makes use of the existing degraded/ impacted areas on the subject property, minimising vegetation loss within areas of recovering intact vegetation patches and associated Species of Conservation Concern (SCC) identified elsewhere on site.
→ The area proposed for the boat garage blocks (approximately 1.3 ha) represents a small proportion of the overall 51.92 ha property, limiting the overall extent of disturbance.
→ The proposed garages require no new water supply, sewerage, stormwater, or electricity infrastructure, thereby avoiding indirect environmental impacts (e.g. increased runoff, wastewater discharge, or energy demand) typically associated with expanded municipal services.
→ The development will make use of an existing informal access route, avoiding the need for new road construction and the associated vegetation clearance, soil disturbance, and habitat fragmentation this would otherwise cause.
→ The development footprint is positioned above the 45 m contour and maintains a setback of more than 100 m from the High-Water Mark of the Breede River Estuary, avoiding direct impacts on the estuarine environment and associated watercourse features.
→ The development supports local tourism and recreational boating activity associated with the Breede Rivier, contributing to the local economy in a manner consistent with the area's existing land use character, without introducing a new or incompatible activity.

Negative impacts

→ The property falls within a mapped Critical Biodiversity Area 1 (CBA1), underlain by Potberg Ferricrete Fynbos, a Critically Endangered vegetation type. Notwithstanding the siting refinements made, the development will result in the permanent loss of vegetation, including some transitional or marginal habitat, within this vegetation type and possibly plant species of conservation concern (SCC).
→ The introduction of additional structures and associated activity (vehicle movement, human presence) may result in localised edge effects on adjacent intact vegetation, including increased risk of alien plant re-infestation, trampling, or disturbance to fauna using the site.
→ The proposed extension adds to the existing developed footprint (currently 11.52 ha), incrementally increasing the total transformed area on a property situated within a CBA1, contributing to cumulative biodiversity loss in the Malgas area over time.
→ Site clearance, earthworks, and construction activity associated with the eight garage blocks may result in temporary impacts, including soil compaction and erosion risk, dust generation, and disturbance to fauna in the vicinity of the development footprint.

→ The addition of eight new garage blocks will alter the visual character of the site to some degree, notwithstanding that the structures are designed to match the existing garage blocks in form and scale.

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

Provide a description of the preferred design or layout alternative.

ALTERNATIVE 2 - PREFERRED

Alternative 2 is identified as the preferred site development layout for the proposed additional Boat Garage blocks on Portion 6 of Farm Stoffels Rivier No. 494, Malgas. This layout was refined by the appointed botanical specialist following a comprehensive site sensitivity verification (SSV) undertaken to assess the underlying vegetation cover, site topography, and localized ecological condition. The field investigation revealed that while intact climax primary vegetation patches on the western portion of the property support high native species richness and Threatened plant Species of Conservation Concern (SCC) such as *Selago ramosissima* and *Agathosma minuta*. However, the central study corridor consists of secondary vegetation recovering from 2009 disturbance and 2022 alien tree removal (*Acacia cyclops*), as well as a transformed area containing river sand stockpiled following the May 2026 Breede River flood event.

Through this spatial optimization process, the scope was scaled down to accommodate eight (8) boat garage blocks, each housing five (5) individual storage units, providing a total of forty (40) new boat storage garages. Under Alternative 2, direct habitat transformation is strictly restricted to 0.1139 hectares of secondary recovered vegetation (CBA2/ESA1) and maximizes the utilization of 0.1261 hectares of critically and seriously modified land (ESA2/transformed), successfully reducing residual ecological impacts to a Low significance level.

Alternative 2 clusters the eight proposed garage blocks into two compact, parallel rows positioned directly alongside the four (4) existing boat garage blocks on the northern portion of the property. Operational access will be facilitated exclusively via the existing internal gravel access road and informal estate tracks, eliminating the need to construct new access roads or widen existing routes. Furthermore, the garage blocks are designed strictly as "dry" storage units requiring no water supply connections, ablution facilities, sewage pipes, effluent treatment systems, or electrical grid expansions. The entire layout envelope is situated above the 45-meter geographical contour line, maintaining a substantial setback of more than 245 meters from the High-Water Mark (HWM) of the Breede River Estuary and more than 32 meters from all mapped non-perennial drainage lines and wetland features on the property.



Figure 15: Alternative 2 – Preferred.

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

Alternative 1

Alternative 1 represents the initial development layout proposed by the applicant prior to detailed botanical sensitivity mapping and Site Sensitivity Verification (SSV). Under this layout, ten (10) boat garage blocks housing a total of 50 individual storage units were proposed (comprising one 12 m x 30 m block and nine 12 m x 25 m blocks). Alternative 1 aligned new garage blocks directly contiguous with existing structures without accounting for underlying ecological sensitivity. Consequently, Alternative 1 encroached directly into intact primary natural Potberg Ferricrete Fynbos on the western section of the property. This would have resulted in the direct transformation of 0.1825 hectares of native vegetation, comprising 0.0334 hectares of primary CBA1 natural habitat (Very High Site Ecological Importance) and 0.1491 hectares of secondary vegetation, while destroying localized populations of Threatened plant Species of Conservation Concern (SCC) such as *Selago ramosissima* and *Agathosma minuta*. Because Alternative 1 carries a Medium residual ecological impact significance both pre- and post-mitigation and causes unnecessary destruction of high-sensitivity fynbos, it is formally rejected as the non-preferred layout option.



Figure 16: Alternative 1 – Non-preferred layout.

No-go

The No-Go Alternative refers to the option of not proceeding with the proposed additional Boat Garage blocks, whereby the site would remain in its current state, with no further development taking place on Portion 6 of the Farm Stoffels Rivier No. 494, Malgas.

Under the No-Go Alternative, the existing garage structures on the property would remain as they are, and the undeveloped portion of the site comprising both the degraded, alien-infested areas and the intact vegetation patches supporting Species of Conservation Concern identified by the botanical specialist would remain unaltered. No additional clearance of vegetation, earthworks, or construction activity associated with the proposed boat garage blocks would occur. From a purely biophysical perspective, the No-Go Alternative would avoid all impacts associated with the proposed development, including any clearance of intact vegetation, construction-phase impacts (noise, dust, erosion, sedimentation risk to the Breede River Estuary).

The No-Go Alternative would forgo the socio-economic benefits associated with the proposed development, including temporary construction-phase employment and local economic activity, and the operational-phase contribution to recreational boating and angling tourism on the Breede River that indirectly supports local tourism-related businesses in Malgas and the wider Breede River Valley. It would also not meet the applicant's stated need and desirability for additional boat storage capacity in the area.

While the No-Go Alternative would avoid all direct environmental impacts associated with construction, it is not preferred, as it fails to address the identified need and desirability for the development and forgoes the associated socio-economic benefits. Given that the preferred Alternative 2 has been specifically optimized to achieve 100% spatial avoidance of primary CBA1 natural fynbos (0.00 ha loss) and confines development to modified and secondary ground, the residual environmental impact of proceeding with Alternative 2 is Low.

Provide a motivation for the preferred design or layout alternative.

Alternative 2 is motivated as the environmentally, operationally, and spatially preferred layout for the proposed Boat Garage blocks expansion on Portion 6 of Farm Stoffels Rivier No. 494, Malgas. This configuration is the direct result of an iterative, specialist-led spatial refinement process designed to fulfil the applicant's demand for recreational boat storage while strictly adhering to the environmental mitigation hierarchy (avoidance, minimization, and mitigation).

Alternative 1 was designed prior to field-based ground-truthing and would have resulted in the direct transformation and permanent loss of intact, recovering Potberg Ferricrete Fynbos a Critically Endangered vegetation type and associated plant Species of Conservation Concern (SCC). In contrast, Alternative 2 was formulated following a site sensitivity verification (SSV) by a botanical specialist who mapped all intact vegetation patches and SCC locations as high sensitivity areas. By reducing the total unit count from ten to eight boat garage blocks, Alternative 2 successfully redirects most of the construction footprint into historically disturbed, alien-dominated (*Acacia cyclops*) ground.

Alternative 2 represents an optimal spatial design that maximizes existing infrastructure while preventing landscape fragmentation. The eight proposed garage blocks are arranged into two compact, parallel rows positioned directly adjacent to the four existing boat garage blocks on the northern portion of the property. This clustering strategy relies entirely on established access roads and informal internal jeep tracks, eliminating the need to construct new access roads or expand civil infrastructure networks. Furthermore, because the development is restricted strictly to boat storage, it requires no water supply, sewage disposal, or electrical grid expansions, ensuring a negligible operational footprint.

A critical planning motivation for Alternative 2 is its complete exclusion from dynamic aquatic and coastal ecosystems. Although the broader property abuts the Breede River Estuary mapped as a Critical Biodiversity Area (CBA: River/Estuary) and Estuarine Functional Zone (EFZ) carrying Very High aquatic sensitivity Alternative 2 is deliberately situated more than 245 meters from the estuary edge and elevated above the 45-meter geographical contour line. Additionally, the footprint maintains a setback of more than 32 meters from all mapped non-perennial drainage lines and wetlands on the property.

Alternative 2 demonstrates full alignment with provincial spatial and estuarine management policies. Alternative 2 satisfies both strategic plans by concentrating development within an existing disturbed cluster and respecting prescribed coastal set-backs.

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

N/A

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

Alternative 1 – Non-Preferred

Positive impacts

- → Retains full development yield of 10 boat garage blocks, one measuring 12 x 30 m.
- → Boat garages are aligned adjacent to the existing garages, requiring no extension of internal roads.
- → Boat garages are located more than 32 m from the mapped non-perennial drainage lines on the property.
- → Boat garages are situated more than 100 m from the High-Water Mark of the Breede River Estuary.

Negative impacts

- → From an ecological perspective, Alternative 1 results in significant direct transformation of high-sensitivity native vegetation because it was formulated prior to fine-scale botanical ground-truthing.
- → This layout causes the direct loss of 0.1825 hectares of Potberg Ferricrete Fynbos, which includes 0.0334 hectares of primary natural Critical Biodiversity Area 1 (CBA1) habitat exhibiting Very High Site Ecological Importance (SEI).
- → It encroaches directly into intact fynbos patches supporting Threatened plant Species of Conservation Concern (SCC), causing the direct destruction of range-restricted species such as *Selago ramosissima* and *Agathosma minuta*.
- → Furthermore, the larger clearance footprint increases construction-phase risks of soil erosion, dust generation, and potential sediment runoff toward adjacent drainage lines and the Breede River Estuary. The loss of primary fynbos compromises local ecological buffering functions and contributes to habitat fragmentation on the property.

Alternative 2 – Preferred

Positive impacts

- → Eight (8) garage blocks are proposed for development, utilising areas that are currently impacted or disturbed on the subject property, within the already degraded, alien-infested footprint, thereby minimising vegetation loss within intact areas.
- → Garage blocks are located more than 32 m from the mapped non-perennial drainage lines on the property.
- → Garage blocks are situated more than 100 m from the High-Water Mark of the Breede River Estuary.
- → The layout allows for adequate turning/manoeuvring space for both the proposed boat garages and vehicles.

- → Direct habitat transformation is strictly confined to 0.1139 hectares of secondary recovered vegetation (CBA2/ESA1) while maximizing the utilization of 0.1261 hectares of modified and transformed land (ESA2), including river sand stockpiles deposited during the May 2026 Breede River flood event.

- → Siting within the already degraded, alien-infested footprint may contribute to a reduction in alien vegetation cover on the property if clearance is followed by appropriate rehabilitation, in line with the EMPr.

- → The reduced construction footprint relative to Alternative 1 correspondingly reduces construction-phase impacts such as noise, dust and vehicle movement in proximity to intact vegetation and the estuary.

- → By concentrating construction on previously disturbed ground, Alternative 2 avoids Threatened SCC populations on the western portion of the property

Negative impacts

- → Despite significant spatial optimization, Alternative 2 entails the unavoidable clearance of 0.1139 hectares of secondary recovered Potberg Ferricrete Fynbos.
- → This results in the localized loss of individual plants within the central corridor, specifically *Agathosma foetidissima*, a resilient SCC that occurs in high local abundance and has demonstrated strong recolonization ability on disturbed area.
- → Minor short-term construction-phase disturbances such as localized noise, dust emissions, and light vehicle traffic will occur in proximity to secondary vegetation during earthworks and building assembly.

No-go

Positive impacts

- → Avoids all direct construction-phase impacts, including vegetation clearance, noise, dust, erosion and sedimentation.
- → From an immediate biophysical standpoint, it eliminates short-term risks of native vegetation clearance, construction noise, dust generation, soil compaction, and potential sediment runoff into nearby watercourses

Negative impacts

- → No development-related economic or social benefits would be realised, including the opportunity to improve or expand existing boat garage blocks and associated recreational use of the property.
- → Degraded and alien-infested areas on the property would remain unmanaged in the absence of a development-linked rehabilitation obligation, foregoing an opportunity for coordinated alien clearance and rehabilitation that would otherwise form part of the EMPr under Alternative 2.

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

Provide a description of the preferred technology alternative:

N/A

Provide a description of any other technology alternatives investigated.

N/A

Provide a motivation for the preferred technology alternative.

N/A

Provide a detailed motivation if no alternatives exist.

No technology alternatives have been proposed or assessed for this development. The proposal is limited to the establishment of additional boat garages, which by their nature do not require electricity and do not involve a choice between competing technologies, processes, or engineering systems.

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

No technology Alternatives have been proposed for this development.

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

Provide a description of the preferred operational alternative.

N/A

Provide a description of any other operational alternatives investigated.

N/A

Provide a motivation for the preferred operational alternative.

N/A

Provide a detailed motivation if no alternatives exist.

No operational alternatives have been identified or are considered applicable to this proposal. The operational function of the development is limited to the private storage of boats within the proposed garage blocks. This is a passive, low-intensity land use with no associated processing, manufacturing, or resource-intensive activity, and no variation in how this storage function is operated would result in a materially different environmental outcome.

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

N/A

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

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

The No-Go option is not preferred for the proposed development. The proposal includes the establishment of additional boat garage blocks, which would have a positive impact on the area, since the proposed blocks will meet the identified demand for additional secure boat storage capacity associated with recreational boating and angling activity on the Breede River, and will support local tourism-related economic activity in Malgas, Stoffels Rivier and the wider Breede River Valley.

In addition to the socio-economic need the development addresses, proceeding with the preferred layout (Alternative 2) will result in the clearing and ongoing control of invasive alien vegetation (predominantly *Acacia cyclops*) within the development footprint, representing a net improvement to the ecological condition of that portion of the site relative to its current, degraded state.

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

No reasonable or feasible property or location alternatives exist outside of Portion 6 of the Farm Stoffels Rivier No. 494. The proposed development is specifically intended to expand an existing recreational boat storage amenity within the Breede Riverine Estate. The facility directly serves the property owners and residents of the estate who hold boat storage rights and access the Breede River Estuary via the estate's established launching slipway.

Securing an alternative off-site property or greenfield location elsewhere along the Breede River corridor is neither practical nor environmentally desirable. Establishing a standalone storage facility elsewhere would duplicate civil infrastructure, increase landscape fragmentation along the river, require the construction of new access roads, and create an isolated operational footprint outside an established residential estate node. Siting the expansion directly contiguous with the four (4) existing boat garage blocks on Portion 6 represents the only logical spatial approach to consolidate infrastructure and prevent unnecessary environmental transformation across the broader 51.92 ha property.

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

The proposed construction of additional boat storage garages on Portion 6 of the Farm Stoffels Rivier No. 494, Stoffels Rivier, Malgas, represents the preferred and most sustainable approach for satisfying the identified need and desirability for expanded recreational boat storage within the Breede Riverine Estate.

Preferred Layout (Alternative 2):

Alternative 2 is formally confirmed as the preferred development layout. This configuration was directly informed by fine-scale botanical ground-truthing and Site Ecological Importance (SEI) mapping to adhere strictly to the environmental mitigation hierarchy of avoidance, minimisation, and rehabilitation. Alternative 2 reduces the development scale to eight (8) boat garage blocks housing forty (40) individual storage units (within a 1.3 ha layout envelope).

Unlike Alternative 1 which directly into intact western fynbos, causing 0.1825 ha of native vegetation loss including 0.0334 ha of primary CBA1 habitat, Alternative 2 achieves 100% spatial avoidance of primary natural CBA1 fynbos, designating the intact western fragment as a permanent No-Go zone. Direct habitat transformation under Alternative 2 is strictly restricted to 0.1139 hectares of secondary recovered vegetation (CBA2/ESA1) and maximizes the utilization of 0.1261 hectares of modified land (ESA2), including river sand stockpiles deposited following the May 2026 Breede River flood event.

Preferred Location of the Activity:

The preferred location for the garage expansion is situated on the northern portion of the property, directly contiguous with the four (4) existing boat garage blocks. Siting the expansion within an established infrastructure node consolidates development, utilizes existing estate access roads, and prevents spatial fragmentation across the 51.92 ha property.

Hydro-geomorphically, the proposed layout is situated entirely above the 45-meter geographical contour line, maintaining a substantial inland setback of approximately 245 meters (well in excess of the 100 m coastal setback) from the High-Water Mark (HWM) of the Breede River Estuary. Furthermore, the footprint maintains a buffer setback of more than 32 meters from all mapped non-perennial drainage lines and wetland features on the property. This spatial separation preserves the estuarine functional zone, eliminates 1:100-year flood risk to the structures, and prevents runoff or sedimentation impacts into nearby aquatic ecosystems.

Operational and Aesthetic Considerations:

No technology or operational alternatives were deemed applicable, given the passive, "dry" nature of the proposed storage facility. The garage blocks require no municipal water supply connections, ablution facilities, sewage pipes, effluent treatment systems, or electrical grid expansions, ensuring a negligible operational footprint. Architecturally, the proposed single-storey structures match the scale, height, and finishes of the existing garage blocks, reading as a logical extension of an established use with zero material visual impact.

Rejection of the No-Go Alternative:

The No-Go (No-Development) Option was evaluated but is not preferred. While it avoids immediate construction activity, it fails to satisfy the verified demand for secure boat storage, forfeits local socio-economic opportunities during construction and operation, and leaves existing site degradation unmanaged. In the absence of an approved Environmental Management Programme (EMPr) under Alternative 2, alien plant re-infestation (*Acacia cyclops*) and unmanaged flood sediment stockpiles would persist, foregoing a coordinated opportunity for long-term alien clearing and ecological rehabilitation.

Best Practicable Environmental Option (BPEO):

On the basis of the comparative alternatives assessment, the application of the mitigation hierarchy, statutory setback compliance, and specialist botanical verification, Alternative 2, located at the specified footprint on Portion

6 of the Farm Stoffels Rivier No. 494, Stoffels Rivier, Malgas, is confirmed as the Best Practicable Environmental Option (BPEO) and is formally recommended for Environmental Authorisation.

2. "No-Go" areas

Explain what "no-go" area(s) have been identified during identification of the alternatives and provide the co-ordinates of the "no-go" area(s).

During the botanical impact assessment and site sensitivity verification conducted for the project the intact primary natural Potberg Ferricrete Fynbos vegetation patch located on the western portion of the property was formally identified and designated as a strict, permanent No-Go area. This primary natural community consists of intact climax fynbos that has experienced minimal historical disturbance, exhibits high native plant species richness, and supports multiple plant Species of Conservation Concern (SCC) including Threatened species such as *Selago ramosissima* (Endangered) and *Agathosma minuta* (Endangered). Based on these ecological attributes, the botanical specialist assigned this western fragment a Site Ecological Importance (SEI) score of Very High and corrected its spatial classification to true Critical Biodiversity Area 1 (CBA1: Terrestrial).

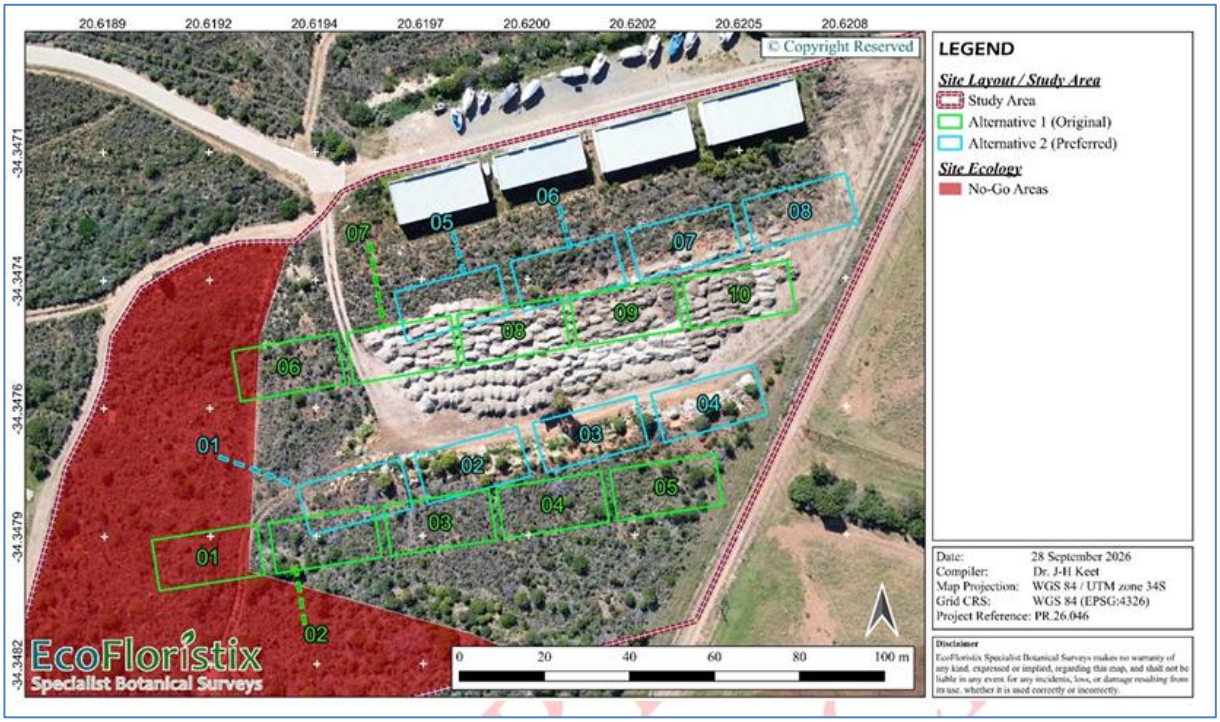


Figure 17: No-go area identified by the botanical specialist.

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

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

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

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

Nature/ Type

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

Significance

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

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

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

Likelihood- the likelihood that an impact will occur

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

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

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

Definition of significance:

Negligible	An impact of negligible significance (or an insignificant impact) is where a resource or receptor (including people) will not be affected in any way by a particular activity, or the predicted effect is deemed to be 'negligible'.

Minor	An impact of minor significance is one where an effect will be experienced, but the impact magnitude is small (with and without mitigation) and within accepted standards, and/or the receptor is of low sensitivity/value.
Moderate	An impact of moderate significance is one within accepted limits and standards. The emphasis for moderate impacts is on demonstrating that the impact has been reduced to a level that is as low as reasonably practicable. This does not necessarily mean that 'moderate' impacts have to be reduced to 'minor' impacts, but that moderate impacts are managed effectively and efficiently.
Major	An impact of major significance is one where an accepted limit or standard may be exceeded, or large magnitude impacts occur to highly valued / sensitive resource / receptors. A goal of the EIA process is to get to a position where the Project does not have any major residual impacts.

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

Significance colour scale (if applicable):

Negative	Positive
Negligible	Negligible
Minor	Minor
Moderate	Moderate
Major	Major

Impact rating colour scale:

Negative	Positive
Negligible	Negligible
Low	Low
Medium	Medium
High	High

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

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

ALTERNATIVE 1

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**1. SOCIOECONOMIC IMPACTS** During the construction phase, the proposed development will require the employment of workers on site. This will contribute to short-term job creation, skills transfer, and local economic stimulation through wages and procurement of goods and services from local suppliers.
Nature of impact:	Positive
Extent and duration of impact:	Local and short-term
Consequence of impact or risk:	Provides temporary income and skills development opportunities for local labour, particularly semi-skilled and unskilled workers, contributing to household income and local economic activity.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	None
Degree to which the impact can be reversed:	None
Indirect impacts:	Increased demand for local accommodation, goods, and services (e.g. building materials suppliers, local retailers); potential increase in local spending power; possible strain on local infrastructure/services if a large influx of non-local labour occur.
Cumulative impact prior to mitigation:	Low – Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very High
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	→ Prioritise employment of local labour from the Malgas area where suitably skilled or trainable individuals are available. → Implement a local procurement policy favouring local suppliers and contractors where feasible. → Provide on-the-job skills training and development opportunities where practical. → Maintain a transparent recruitment process (e.g. via the ward councillor or community liaison forum) to ensure equitable access to employment opportunities. → Ensure compliance with the Basic Conditions of Employment Act and fair labour practices.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (+)

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**2. DUST** During the construction phase of the development, site clearance, excavation, earthworks, stockpiling of soil/sand, and vehicle movement on unpaved surfaces will generate dust emissions, particularly during dry and windy conditions.
Nature of impact:	Negative
Extent and duration of impact:	Site specific; Short- term (during the construction phase)
Consequence of impact or risk:	Medium — dust generation could cause nuisance to nearby residents and sensitive receptors, temporarily reduce local air quality, and settle on adjacent vegetation, potentially affecting photosynthesis and plant health in sensitive fynbos areas.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	High
Indirect impacts:	Potential health irritation (respiratory) to workers and nearby residents; reduced visibility on access roads; dust deposition on nearby properties, vehicles, or vegetation; possible nuisance complaints from neighbouring landowners.
Cumulative impact prior to mitigation:	Low – Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	→ Apply water suppression (dust suppression via water spraying) on exposed soil surfaces, stockpiles, and unpaved access roads during dry and windy conditions. → Restrict vehicle speeds on unpaved site roads to reduce dust generation. → Minimise the extent and duration of exposed/cleared soil areas clear only the area required for immediate construction activities (phased site clearance). → Cover or stabilise stockpiled soil/sand (e.g. with shade cloth, hessian, or vegetation) when not in active use. → Schedule dust-generating activities (e.g. excavation) to avoid periods of strong wind where practical. → Establish and maintain vegetated or physical buffers around stockpile areas where feasible. → Implement a complaints register/mechanism for nearby residents to report dust nuisance, with corrective action triggered accordingly. → Ensure the ECO monitors dust generation and suppression compliance during site inspections.
Residual impacts:	Minor, localised, temporary dust nuisance may still occur during peak construction activity or high-wind events despite mitigation.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**3. VISUAL IMPACTS** During the construction phase of the development, the proposed development will contribute to the clearance of indigenous vegetation on an area which is currently vegetated. This clearance will contribute to a visible change in the landscape, which was previously vegetated; however, this change will be visually contained to the construction footprint and will be a precursor to the more permanent visual change associated with the operational phase structures.
Nature of impact:	Negative
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	Medium — construction activity and vegetation clearance will be visually noticeable and may detract from the current sense of place and scenic quality of the area, particularly in a landscape valued for its natural coastal/fynbos character.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Low – Medium
Degree to which the impact can be reversed:	Medium — the construction-related visual disturbance (stockpiles, exposed soil, equipment, hoarding) is reversible upon completion of construction and can be improved through rehabilitation of disturbed areas not covered by permanent infrastructure; however, visual change associated with permanent structures will persist into the operational phase.
Indirect impacts:	Potential temporary reduction in scenic/aesthetic value for nearby residents, road users, and recreational users of the area (e.g. estuary users, hikers); possible perception of reduced sense of place during the construction period; dust and construction lighting (if night work occurs) may compound visual disturbance.
Cumulative impact prior to mitigation:	Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – Medium
Degree to which the impact can be avoided:	Low – Medium
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Limit vegetation clearance strictly to the approved development footprint and demarcate "no-go" areas to prevent unnecessary clearing. → Phase site clearance to coincide with construction programme requirements, avoiding premature clearing of areas not yet under active construction. → Screen construction activities from public viewpoints where practical (e.g. using shade cloth screening or retaining vegetated buffers along site boundaries). → Stockpile cleared vegetation/topsoil in a manner that minimises visual prominence and enables later use in rehabilitation. → Maintain a tidy, well-managed construction site (e.g. controlled storage of materials, prompt removal of litter and waste) to reduce visual clutter.

	→ Rehabilitate and re-vegetate disturbed areas not required for permanent infrastructure as soon as practicable following construction, using indigenous species appropriate to the surrounding vegetation type. → Restrict construction lighting to what is necessary for safety and security, directed away from surrounding properties and sensitive viewpoints, to limit visual/light spill impacts.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**4. NOISE** Generation of noise during construction activities, including site clearing, earthworks, delivery vehicles, use of construction machinery (e.g. excavators, compactors) and hand/power tools during erection of the ten garage blocks. This may cause temporary disturbance to nearby landowners, farm workers, and fauna utilising the adjacent Breede River riparian corridor and retained fynbos vegetation.
Nature of impact:	Negative
Extent and duration of impact:	Local; Short-term
Consequence of impact or risk:	Low
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	None
Degree to which the impact can be reversed:	Fully reversible
Indirect impacts:	Potential secondary disturbance to fauna movement along the Breede River corridor during peak construction noise periods; possible cumulative nuisance if construction coincides with other activity in the area.
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Restrict construction activities to normal working hours (weekdays only, with limited or no weekend/public holiday work unless otherwise agreed with the ECO). → Ensure all plant, machinery and vehicles are fitted with functioning silencers/mufflers and are properly serviced and maintained. → Switch off idling machinery and vehicles when not in active use. → Where practicable, schedule the noisiest activities (e.g. clearing, earthworks) for the middle of the day rather than early morning/late afternoon.

	→ Maintain a complaints register and respond to any noise-related complaints from neighbouring landowners within a reasonable timeframe.
Residual impacts:	Very Low
Cumulative impact post mitigation:	Very Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**5. BOTANICAL/ ECOLOGICAL IMPACTS** Loss of plant community types, specifically Potberg Ferricrete Fynbos (Endangered).
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term
Consequence of impact or risk:	Low
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	The loss of natural and secondary Potberg Ferricrete Fynbos would reduce the extent and connectivity of habitat that supports Species of Conservation Concern (SCC). Alternative 1 would also encroach upon the primary natural fragment in the western portion of the site. Clearing and soil disturbance would create opportunities for the establishment and spread of invasive alien plant species, notably *Acacia cyclops*, *A. saligna*, *A. mearnsii* and *Eucalyptus conferruminata*. Edge effects, fragmentation of the remaining vegetation and localised erosion may also result. Within the footprint, individuals of *Agathosma foetidissima* (Near Threatened), *Hermannia lavandulifolia* (Vulnerable) and *Serruria* "ludwigii" would be lost, with the latter two occurring in low numbers.
Cumulative impact prior to mitigation:	The proposed loss adds to the historical transformation of Potberg Ferricrete Fynbos, of which approximately 47.8% remains. It would reduce the ability to meet provincial and national conservation targets for a Critically Endangered ecosystem and its associated SCC.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Medium (Limited)
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Any landowners must adhere to their legal obligations to actively eradicate and manage alien vegetation infestations present on the applicable and surrounding properties. → SCC and/or protected plant species should be avoided wherever possible. If individuals cannot be avoided, then a permit for their destruction must be obtained from the relevant local authority.

	→ No plant species, whether native or exotic, should be brought into, or removed from, the study area, to prevent the spread of exotic or invasive species or the illegal collection of plants. → No plants may be translocated or otherwise uprooted or disturbed for rehabilitation or other purposes without express permission from the Contractor's EO or without the relevant permits. → Blanket clearing of vegetation must be limited to the proposed footprint, and only where necessary; no clearing outside of permitted areas may take place. → Clearing of vegetation should be minimized and avoided where possible. → Immediately rehabilitate all areas outside of the proposed development site that were disturbed and implement mitigation measures to prevent associated impacts from re-occurring.
Residual impacts:	Low-Medium
Cumulative impact post mitigation:	Low-Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**6. BOTANICAL/ ECOLOGICAL IMPACTS** Loss of Species of Conservation Concern (SCC) and protected plant species.
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term
Consequence of impact or risk:	Very Low
Probability of occurrence:	Highly Probable
Degree to which the impact may cause irreplaceable loss of resources:	Marginal
Degree to which the impact can be reversed:	Partly Reversed
Indirect impacts:	Further loss of SCC habitat and reduced population connectivity at the site. Loss of SCC individuals may, cumulatively, contribute to a future elevation of the national conservation status of these species if similar habitat is lost in the surrounding area. Disturbance around the footprint may also affect adjacent SCC individuals.
Cumulative impact prior to mitigation:	Most of the SCC recorded are habitat-restricted and are declining because of agricultural transformation and alien plant invasion. Under Alternative 1, the footprint overlaps with individuals of *Agathosma foetidissima*, *Hermannia lavandulifolia* (Vulnerable; a few individuals) and *Serruria* "ludwigii" (a few individuals). Because most of the remaining habitat has already been lost, further losses add to an existing cumulative pressure on these species.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Low
Degree to which the impact can be avoided:	Partial. Most of the individual SCC occur outside the footprint and can be avoided through demarcation.
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium

Proposed mitigation:	→ Any landowners must adhere to their legal obligations to actively eradicate and manage alien vegetation infestations present on the applicable and surrounding properties. → SCC and/or protected plant species should be avoided wherever possible. If individuals cannot be avoided, then a permit for their destruction must be obtained from the relevant local authority. → No plant species, whether native or exotic, should be brought into, or removed from, the study area, to prevent the spread of exotic or invasive species or the illegal collection of plants. → No plants may be translocated or otherwise uprooted or disturbed for rehabilitation or other purposes without express permission from the Contractor's EO or without the relevant permits. → Blanket clearing of vegetation must be limited to the proposed footprint, and only where necessary; no clearing outside of permitted areas may take place. → Clearing of vegetation should be minimized and avoided where possible. → Immediately rehabilitate all areas outside of the proposed development site that were disturbed and implement mitigation measures to prevent associated impacts from re-occurring.
Residual impacts:	Low – Medium
Cumulative impact post mitigation:	Low – Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – Medium
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**7. ECOLOGICAL/ BOTANICAL IMPACTS** Spread and/or establishment of alien and invasive plant species.
Nature of impact:	Negative
Extent and duration of impact:	Local; Medium-term
Consequence of impact or risk:	Very Low
Probability of occurrence:	Highly Probable
Degree to which the impact may cause irreplaceable loss of resources:	Marginal
Degree to which the impact can be reversed:	Moderatey reversible
Indirect impacts:	Large parts of the site were densely invaded in the past. Most of this infestation has since been cleared, but individuals of *Acacia cyclops* (Category 1b), *A. saligna* (Category 1b), *A. mearnsii* (Category 2) and *Eucalyptus conferruminata* (Category 1b) remain. These species are nitrogen-fixing legumes (the *Acacia* species) that alter soil conditions to the detriment of indigenous species. Soil disturbance from clearing and construction, the movement of vehicles, equipment and workers, and the import of building materials create opportunities for the establishment of these species and for the introduction of new ones. The alien species now present do not occur in high abundance.
Cumulative impact prior to mitigation:	Establishment of alien plants in the disturbed footprint and adjacent secondary vegetation would degrade habitat quality for SCC and further reduce the value of the Critically Endangered vegetation type.

	The specialist notes that the two alternatives carry the same risk in this regard.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – Low
Degree to which the impact can be avoided:	Partial
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ IAPs, wherever present, must be cleared as per NEM:BA requirements where applicable and must not be allowed to spread. → Clearing methods should aim to keep disturbance to a minimum and must be undertaken in accordance with relevant guidelines. Any area that is cleared of IAPs must receive regular follow-up treatments (preferably at least three follow-ups) to ensure that populations do not re-establish after such initial clearing efforts. → Any chemicals/herbicides used during clearing efforts must strictly be used only in accordance with the manufactures guidelines. → Under no circumstances should unqualified persons be allowed to conduct IAPs clearing using chemicals/herbicides or dangerous equipment without supervision from a suitably qualified pest control officer. Such a qualified pest control officer must be present on site at all times during IAPs clearing. → No planting or importing of any alien species to the site for landscaping, rehabilitation, or any other purpose should be allowed.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**8. ECOLOGICAL/BOTANICAL IMPACTS** The loss of vegetation types on a cumulative basis from the broader area negatively impacts provincial and national conservation targets.
Nature of impact:	Negative
Extent and duration of impact:	Local; Long- term
Consequence of impact or risk:	Medium - The loss might in future contribute to affecting and elevating national listings if similar habitats in the surrounding area also disappear.
Probability of occurrence:	Highly Probable
Degree to which the impact may cause irreplaceable loss of resources:	Marginal
Degree to which the impact can be reversed:	Moderately reversible
Indirect impacts:	Removal of vegetation within areas of intact vegetation as well as plan species of conservation concern in these areas will contribute to decline of these species.
Cumulative impact prior to mitigation:	

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Partial
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Avoid unnecessary damage to vegetation wherever possible. → Any signs of erosion resulting from the project activities must be rectified immediately and monitored thereafter to ensure that there is no re-occurrence. → All affected areas resulting from the proposed activities, and that are not part of the proposed activities, should be re-vegetated with locally occurring native species to bind the soil and limit erosion potential. → Avoid No-Go areas wherever possible.
Residual impacts:	Medium – Low
Cumulative impact post mitigation:	Medium – Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**9. ECOLOGICAL/ BOTANICAL IMPACTS** Disruption of broad-scale ecological processes.
Nature of impact:	Negative
Extent and duration of impact:	Local; Short-term
Consequence of impact or risk:	Medium - Habitat destruction and fragmentation can potentially disrupt the connectivity of the landscape for fauna and flora, and impair their ability to respond to environmental fluctuations. It can also eventually lead indirectly to the loss of local plant community types, SCC, protected plant species, and genetic diversity, among other things, if these occur on a cumulative basis in the surrounding areas.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Marginal
Degree to which the impact can be reversed:	Moderately reversible
Indirect impacts:	Disruption of landscape connectivity for flora and fauna, impairment of ecosystem resilience to environmental fluctuations, and potential indirect loss of local plant communities, SCC populations, protected species, and genetic diversity across the broader landscape.
Cumulative impact prior to mitigation:	Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Partial
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Avoid unnecessary damage to vegetation wherever possible. → Any signs of erosion resulting from the project activities must be rectified immediately and monitored thereafter to ensure that there is no re-occurrence. → All affected areas resulting from the proposed activities, and that are not part of the proposed activities, should be re-

	vegetated with locally occurring native species to bind the soil and limit erosion potential. → Avoid No-Go areas wherever possible.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
POST- CONSTRUCTION PHASE	
Potential impact and risk:	**1. SOCIOECONOMIC IMPACT** The operational phase of the proposed boat garage blocks is anticipated to generate positive socio-economic outcomes for the local area. The development is expected to contribute to a change in the economic status of the Malgas area through increased local economic activity, including opportunities for local employment, procurement of goods and services from local suppliers, and increased municipal revenue for Swellendam Municipality. The development may further stimulate secondary economic activity associated with tourism and recreational use of the Breede River, contributing to the broader socio-economic upliftment of the surrounding community.
Nature of impact:	Positive
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	Low
Probability of occurrence:	Possible
Degree to which the impact may cause irreplaceable loss of resources:	Low degree
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	Increased local employment and skills development; increased demand for local goods and services (construction and hospitality-related suppliers); potential increase in property values in the surrounding area; increased municipal rates and revenue base for Swellendam Municipality; potential stimulation of subsidiary tourism and recreational economic activity along the Breede River.
Cumulative impact prior to mitigation:	Positive cumulative impacts
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Positive
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	→ Prioritize local labour for the operational phase and maintenance positions where suitably skilled individuals are available.
Residual impacts:	Medium – High; Continued positive contribution to the local income generation and municipal revenue for the operational lifetime of the development.
Cumulative impact post mitigation:	Medium – High

Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High (+)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**2. VISUAL** The potential impacts associated with the proposed additional boat garages is anticipated to result in change of sense of place and change of the scenic character of the site. However, the development I situated on the agricultural land use areas, and outside the urban edge, the minimal impacts expected from the visual impacts are only felt on a site-specific level.
Nature of impact:	Negative
Extent and duration of impact:	Site specific; Long-term
Consequence of impact or risk:	Low
Probability of occurrence:	Define
Degree to which the impact may cause irreplaceable loss of resources:	Low – no irreplaceable loss of resources anticipated; the change relates to visual character rather than loss of a physical resource.
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	Minimal; potential minor perception effects on occasional passers-by or neighbouring land users, given the site's location outside the urban edge and within an agricultural setting.
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ The external finishes (roof sheeting, cladding and wall colours) of the proposed units shall match or closely complement those of the existing boat garages on the property, to maintain visual consistency and avoid the introduction of contrasting or reflective materials into the agricultural setting. → Building height shall be restricted to that required for functional boat storage purposes only, so as to limit the vertical visual profile of the structures against the surrounding landscape. → Where practicable, existing vegetation and topographic screening on the property shall be retained and, where necessary, supplemented with locally indigenous vegetation planting along the periphery of the development footprint, to provide additional visual screening from surrounding vantage points without compromising the intact, high-sensitivity vegetation identified elsewhere in this report. → No external lighting beyond that required for basic operational safety and security shall be installed; where required, lighting shall be low-intensity, downward-directed, and shielded, to limit night-time visual intrusion and glare on the surrounding agricultural and riverine environment.
Residual impacts:	Low
Cumulative impact post mitigation:	Low

Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**10. ECOLOGICAL/ BOTANICAL IMPACTS** Disruption of broad-scale ecological processes.
Nature of impact:	Negative
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	Medium - Habitat destruction and fragmentation can potentially disrupt the connectivity of the landscape for fauna and flora, and impair their ability to respond to environmental fluctuations. It can also eventually lead indirectly to the loss of local plant community types, SCC, protected plant species, and genetic diversity, among other things, if these occur on a cumulative basis in the surrounding areas.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Marginal
Degree to which the impact can be reversed:	Moderately reversible
Indirect impacts:	Disruption of landscape connectivity for flora and fauna, impairment of ecosystem resilience to environmental fluctuations, and potential indirect loss of local plant communities, SCC populations, protected species, and genetic diversity across the broader landscape.
Cumulative impact prior to mitigation:	Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Partial
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Avoid unnecessary damage to vegetation wherever possible. → Any signs of erosion resulting from the project activities must be rectified immediately and monitored thereafter to ensure that there is no re-occurrence. → All affected areas resulting from the proposed activities, and that are not part of the proposed activities, should be re-vegetated with locally occurring native species to bind the soil and limit erosion potential. Avoid No-Go areas wherever possible.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
DECOMMISSIONING PHASE	
Potential impact and risk:	**N/A**
Nature of impact:	N/A
Extent and duration of impact:	N/A
Consequence of impact or risk:	N/A
Probability of occurrence:	N/A

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

ALTERNATIVE 2 – PREFERRED

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**1. SOCIOECONOMIC IMPACTS** During the construction phase, the proposed development will require the employment of workers on site. This will contribute to short-term job creation, skills transfer, and local economic stimulation through wages and procurement of goods and services from local suppliers.
Nature of impact:	Positive
Extent and duration of impact:	Local and short-term
Consequence of impact or risk:	Provides temporary income and skills development opportunities for local labour, particularly semi-skilled and unskilled workers, contributing to household income and local economic activity.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	None
Degree to which the impact can be reversed:	None
Indirect impacts:	Increased demand for local accommodation, goods, and services (e.g. building materials suppliers, local retailers); potential increase in local spending power; possible strain on local infrastructure/services if a large influx of non-local labour occur.
Cumulative impact prior to mitigation:	Low – Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very High
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	→ Prioritise employment of local labour from the Malgas area where suitably skilled or trainable individuals are available. → Implement a local procurement policy favouring local suppliers and contractors where feasible. → Provide on-the-job skills training and development opportunities where practical. → Maintain a transparent recruitment process (e.g. via the ward councillor or community liaison forum) to ensure equitable access to employment opportunities. → Ensure compliance with the Basic Conditions of Employment Act and fair labour practices.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (+)

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**2. DUST** During the construction phase of the development, site clearance, excavation, earthworks, stockpiling of soil/sand, and vehicle movement on unpaved surfaces will generate dust emissions, particularly during dry and windy conditions.
Nature of impact:	Negative
Extent and duration of impact:	Site specific; Short- term (during the construction phase)
Consequence of impact or risk:	Medium — dust generation could cause nuisance to nearby residents and sensitive receptors, temporarily reduce local air quality, and settle on adjacent vegetation, potentially affecting photosynthesis and plant health in sensitive fynbos areas.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	High
Indirect impacts:	Potential health irritation (respiratory) to workers and nearby residents; reduced visibility on access roads; dust deposition on nearby properties, vehicles, or vegetation; possible nuisance complaints from neighbouring landowners.
Cumulative impact prior to mitigation:	Low – Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	→ Apply water suppression (dust suppression via water spraying) on exposed soil surfaces, stockpiles, and unpaved access roads during dry and windy conditions. → Restrict vehicle speeds on unpaved site roads to reduce dust generation. → Minimise the extent and duration of exposed/cleared soil areas clear only the area required for immediate construction activities (phased site clearance). → Cover or stabilise stockpiled soil/sand (e.g. with shade cloth, hessian, or vegetation) when not in active use. → Schedule dust-generating activities (e.g. excavation) to avoid periods of strong wind where practical. → Establish and maintain vegetated or physical buffers around stockpile areas where feasible. → Implement a complaints register/mechanism for nearby residents to report dust nuisance, with corrective action triggered accordingly. → Ensure the ECO monitors dust generation and suppression compliance during site inspections.
Residual impacts:	Minor, localised, temporary dust nuisance may still occur during peak construction activity or high-wind events despite mitigation.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**3. VISUAL IMPACTS** During the construction phase of the development, the proposed development will contribute to the clearance of indigenous vegetation on an area which is currently vegetated. This clearance will contribute to a visible change in the landscape, which was previously vegetated; however, this change will be visually contained to the construction footprint and will be a precursor to the more permanent visual change associated with the operational phase structures.
Nature of impact:	Negative
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	Medium — construction activity and vegetation clearance will be visually noticeable and may detract from the current sense of place and scenic quality of the area, particularly in a landscape valued for its natural coastal/fynbos character.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Low – Medium
Degree to which the impact can be reversed:	Medium — the construction-related visual disturbance (stockpiles, exposed soil, equipment, hoarding) is reversible upon completion of construction and can be improved through rehabilitation of disturbed areas not covered by permanent infrastructure; however, visual change associated with permanent structures will persist into the operational phase.
Indirect impacts:	Potential temporary reduction in scenic/aesthetic value for nearby residents, road users, and recreational users of the area (e.g. estuary users, hikers); possible perception of reduced sense of place during the construction period; dust and construction lighting (if night work occurs) may compound visual disturbance.
Cumulative impact prior to mitigation:	Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – Medium
Degree to which the impact can be avoided:	Low – Medium
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Limit vegetation clearance strictly to the approved development footprint and demarcate "no-go" areas to prevent unnecessary clearing. → Phase site clearance to coincide with construction programme requirements, avoiding premature clearing of areas not yet under active construction. → Screen construction activities from public viewpoints where practical (e.g. using shade cloth screening or retaining vegetated buffers along site boundaries). → Stockpile cleared vegetation/topsoil in a manner that minimises visual prominence and enables later use in rehabilitation. → Maintain a tidy, well-managed construction site (e.g. controlled storage of materials, prompt removal of litter and waste) to reduce visual clutter.

	→ Rehabilitate and re-vegetate disturbed areas not required for permanent infrastructure as soon as practicable following construction, using indigenous species appropriate to the surrounding vegetation type. → Restrict construction lighting to what is necessary for safety and security, directed away from surrounding properties and sensitive viewpoints, to limit visual/light spill impacts. → Construction-related visual disturbance (e.g. stockpiled materials, temporary structures) shall be confined to the designated construction footprint and screened or removed promptly on completion of construction, in accordance with the EMPr.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**4. NOISE** Generation of noise during construction activities, including site clearing, earthworks, delivery vehicles, use of construction machinery (e.g. excavators, compactors) and hand/power tools during erection of the ten garage blocks. This may cause temporary disturbance to nearby landowners, farm workers, and fauna utilising the adjacent Breede River riparian corridor and retained fynbos vegetation.
Nature of impact:	Negative
Extent and duration of impact:	Local; Short-term
Consequence of impact or risk:	Low
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	None
Degree to which the impact can be reversed:	Fully reversible
Indirect impacts:	Potential secondary disturbance to fauna movement along the Breede River corridor during peak construction noise periods; possible cumulative nuisance if construction coincides with other activity in the area.
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Restrict construction activities to normal working hours (weekdays only, with limited or no weekend/public holiday work unless otherwise agreed with the ECO). → Ensure all plant, machinery and vehicles are fitted with functioning silencers/mufflers and are properly serviced and maintained. → Switch off idling machinery and vehicles when not in active use.

	→ Where practicable, schedule the noisiest activities (e.g. clearing, earthworks) for the middle of the day rather than early morning/late afternoon. → Maintain a complaints register and respond to any noise-related complaints from neighbouring landowners within a reasonable timeframe.
Residual impacts:	Very Low
Cumulative impact post mitigation:	Very Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**5. BOTANICAL/ ECOLOGICAL IMPACTS** Loss of plant community types, specifically Potberg Ferricrete Fynbos (Endangered).
Nature of impact:	Negative
Extent and duration of impact:	Local; Medium – Term
Consequence of impact or risk:	Very Low
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Marginal
Degree to which the impact can be reversed:	Moderately reversible
Indirect impacts:	Decline to the Potberg Ferricrete Vegetation type as a result of clearance of indigenous vegetation.
Cumulative impact prior to mitigation:	Low-Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Partial
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Any landowners must adhere to their legal obligations to actively eradicate and manage alien vegetation infestations present on the applicable and surrounding properties. → SCC and/or protected plant species should be avoided wherever possible. If individuals cannot be avoided, then a permit for their destruction must be obtained from the relevant local authority. → No plant species, whether native or exotic, should be brought into, or removed from, the study area, to prevent the spread of exotic or invasive species or the illegal collection of plants. → No plants may be translocated or otherwise uprooted or disturbed for rehabilitation or other purposes without express permission from the Contractor's EO or without the relevant permits. → Blanket clearing of vegetation must be limited to the proposed footprint, and only where necessary; no clearing outside of permitted areas may take place. → Clearing of vegetation should be minimized and avoided where possible.

	→ Immediately rehabilitate all areas outside of the proposed development site that were disturbed and implement mitigation measures to prevent associated impacts from re-occurring.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**6. ECOLOGICAL/ BOTANICALIMPACTS** Loss of plant Species of Conservation Concern
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term
Consequence of impact or risk:	Very – Low : A2 is again a superior layout since it almost completely avoids Endangered species, and will also lead to a recued loss of *Agathosma foetidissima*, which is especially abundant in the area directly south of the cleared central section.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Marginal Loss
Degree to which the impact can be reversed:	Partially reversible
Indirect impacts:	Decline in the plant species associated with Potberg Ferricrete Fynbos vegetation type.
Cumulative impact prior to mitigation:	Low – Loss of plant species of conservation concern.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Partial
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Any landowners must adhere to their legal obligations to actively eradicate and manage alien vegetation infestations present on the applicable and surrounding properties. → SCC and/or protected plant species should be avoided wherever possible. If individuals cannot be avoided, then a permit for their destruction must be obtained from the relevant local authority. → No plant species, whether native or exotic, should be brought into, or removed from, the study area, to prevent the spread of exotic or invasive species or the illegal collection of plants. → No plants may be translocated or otherwise uprooted or disturbed for rehabilitation or other purposes without express permission from the Contractor's EO or without the relevant permits. → Blanket clearing of vegetation must be limited to the proposed footprint, and only where necessary; no clearing outside of permitted areas may take place. → Clearing of vegetation should be minimized and avoided where possible.

	→ Immediately rehabilitate all areas outside of the proposed development site that were disturbed and implement mitigation measures to prevent associated impacts from re-occurring.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**7. ECOLOGICAL/ BOTANICAL IMPACTS** Spread and/or establishment of alien and/or invasive species.
Nature of impact:	Negative
Extent and duration of impact:	Local; Medium – Term
Consequence of impact or risk:	Very Low;
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss
Degree to which the impact can be reversed:	Moderately reversible
Indirect impacts:	Degradation of surrounding native plant communities, alteration of soil nutrient conditions (e.g. nitrogen fixation by *Acacia cyclops*), displacement of native fynbos species, and increased fire risk
Cumulative impact prior to mitigation:	Medium – Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – Low
Degree to which the impact can be avoided:	Partial Avoidance
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ IAPs, wherever present, must be cleared as per NEM:BA requirements where applicable and must not be allowed to spread. → Clearing methods should aim to keep disturbance to a minimum and must be undertaken in accordance with relevant guidelines. → Any area that is cleared of IAPs must receive regular follow-up treatments (preferably at least three follow-ups) to ensure that populations do not re-establish after such initial clearing efforts. → Any chemicals/herbicides used during clearing efforts must strictly be used only in accordance with the manufactures guidelines. → Under no circumstances should unqualified persons be allowed to conduct IAPs clearing using chemicals/herbicides or dangerous equipment without supervision from a suitably qualified pest control officer. Such a qualified pest control officer must be present on site at all times during IAPs clearing. → No planting or importing of any alien species to the site for landscaping, rehabilitation, or any other purpose should be allowed.
Residual impacts:	Low
Cumulative impact post mitigation:	Low

Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**8. ECOLOGICAL/ BOTANICAL IMPACTS** The loss of vegetation types on a cumulative basis from the broader area negatively impacts provincial and national conservation targets.
Nature of impact:	Negative
Extent and duration of impact:	Local; Long – Term
Consequence of impact or risk:	Low - Direct loss under Alternative 2 is restricted to a very small footprint of secondary vegetation (0.1139 ha) and modified land (0.1261 ha), while completely avoiding primary natural Potberg Ferricrete Fynbos patches.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Marginal Loss
Degree to which the impact can be reversed:	Moderate
Indirect impacts:	Indirect contribution to national and provincial conservation target reductions and potential long-term influences on the threat listings of Species of Conservation Concern (SCC) if similar habitats in the surrounding region are lost cumulatively.
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Partial Avoidance
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Avoid unnecessary damage to vegetation wherever possible. → Any signs of erosion resulting from the project activities must be rectified immediately and monitored thereafter to ensure that there is no re-occurrence. → All affected areas resulting from the proposed activities, and that are not part of the proposed activities, should be re-vegetated with locally occurring native species to bind the soil and limit erosion potential. → Avoid No-Go areas wherever possible.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**9. ECOLOGICAL/ BOTANICAL IMPACTS** Disruption of broad-scale ecological processes.
Nature of impact:	Negative
Extent and duration of impact:	Local; Medium – Term

Consequence of impact or risk:	Very Low - Given the small scale of proposed operations and the complete avoidance of primary natural fynbos, the layout will not drastically alter broad-scale ecological processes.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Marginal
Degree to which the impact can be reversed:	Moderately Reversible
Indirect impacts:	Potential disruption of landscape connectivity for fauna and flora, impairment of ecosystem adaptability to environmental fluctuations, and potential indirect cumulative loss of local plant communities, Species of Conservation Concern (SCC), protected plant species, and genetic diversity across the broader surrounding landscape.
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Partial
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Avoid unnecessary damage to vegetation wherever possible. → Any signs of erosion resulting from the project activities must be rectified immediately and monitored thereafter to ensure that there is no re-occurrence. → All affected areas resulting from the proposed activities, and that are not part of the proposed activities, should be re-vegetated with locally occurring native species to bind the soil and limit erosion potential. → Avoid No-Go areas wherever possible.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
POST- CONSTRUCTION PHASE	
Potential impact and risk:	**10. SOCIOECONOMIC IMPACT** The operational phase of the proposed boat garage blocks is anticipated to generate positive socio-economic outcomes for the local area. The development is expected to contribute to a change in the economic status of the Malgas area through increased local economic activity, including opportunities for local employment, procurement of goods and services from local suppliers, and increased municipal revenue for Swellendam Municipality. The development may further stimulate secondary economic activity associated with tourism and recreational use of the Breede River, contributing to the broader socio-economic upliftment of the surrounding community.
Nature of impact:	Positive
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	Low
Probability of occurrence:	Possible

Degree to which the impact may cause irreplaceable loss of resources:	Low degree
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	Increased local employment and skills development; increased demand for local goods and services (construction and hospitality-related suppliers); potential increase in property values in the surrounding area; increased municipal rates and revenue base for Swellendam Municipality; potential stimulation of subsidiary tourism and recreational economic activity along the Breede River.
Cumulative impact prior to mitigation:	Positive cumulative impacts
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Positive
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	→ Prioritize local labour for the operational phase and maintenance positions where suitably skilled individuals are available.
Residual impacts:	Medium – High; Continued positive contribution to the local income generation and municipal revenue for the operational lifetime of the development.
Cumulative impact post mitigation:	Medium – High
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High (+)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**11. VISUAL** The potential impacts associated with the proposed additional boat garages is anticipated to result in change of sense of place and change of the scenic character of the site. However, the development I situated on the agricultural land use areas, and outside the urban edge, the minimal impacts expected from the visual impacts are only felt on a site-specific level.
Nature of impact:	Negative
Extent and duration of impact:	Site specific; Long-term
Consequence of impact or risk:	Low
Probability of occurrence:	Define
Degree to which the impact may cause irreplaceable loss of resources:	Low – no irreplaceable loss of resources anticipated; the change relates to visual character rather than loss of a physical resource.
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	Minimal; potential minor perception effects on occasional passers-by or neighbouring land users, given the site's location outside the urban edge and within an agricultural setting.
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low

Proposed mitigation:	→ The external finishes (roof sheeting, cladding and wall colours) of the proposed units shall match or closely complement those of the existing boat garages on the property, to maintain visual consistency and avoid the introduction of contrasting or reflective materials into the agricultural setting. → Building height shall be restricted to that required for functional boat storage purposes only, so as to limit the vertical visual profile of the structures against the surrounding landscape. → Where practicable, existing vegetation and topographic screening on the property shall be retained and, where necessary, supplemented with locally indigenous vegetation planting along the periphery of the development footprint, to provide additional visual screening from surrounding vantage points without compromising the intact, high-sensitivity vegetation identified elsewhere in this report. → No external lighting beyond that required for basic operational safety and security shall be installed; where required, lighting shall be low-intensity, downward-directed, and shielded, to limit night-time visual intrusion and glare on the surrounding agricultural and riverine environment.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**12. ECOLOGICAL IMPACTS** Spread and/or Establishment of Invasive Alien Plant (IAP) Species
Nature of impact:	Negative
Extent and duration of impact:	Local; Medium – term
Consequence of impact or risk:	Very Low
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss
Degree to which the impact can be reversed:	Moderately reversible
Indirect impacts:	Degradation of surrounding native plant communities, modification of soil nutrient profiles (e.g., nitrogen fixation by *Acacia* species), suppression of native fynbos seed germination, and increased fire risk.
Cumulative impact prior to mitigation:	Medium – Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – Low
Degree to which the impact can be avoided:	Partial Avoidance
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ APs, wherever present, must be cleared as per NEM:BA requirements where applicable and must not be allowed to spread. → Clearing methods should aim to keep disturbance to a minimum and must be undertaken in accordance with relevant guidelines.

	→ Any area that is cleared of IAPs must receive regular follow-up treatments (preferably at least three follow-ups) to ensure that populations do not re-establish after such initial clearing efforts. → Any chemicals/herbicides used during clearing efforts must strictly be used only in accordance with the manufactures guidelines. → Under no circumstances should unqualified persons be allowed to conduct IAPs clearing using chemicals/herbicides or dangerous equipment without supervision from a suitably qualified pest control officer. Such a qualified pest control officer must be present on site at all times during IAPs clearing. → No planting or importing of any alien species to the site for landscaping, rehabilitation, or any other purpose should be allowed.
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
DECOMMISSIONING PHASE	
Potential impact and risk:	N/A
Nature of impact:	N/A
Extent and duration of impact:	N/A
Consequence of impact or risk:	N/A
Probability of occurrence:	N/A
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Degree to which the impact can be reversed:	N/A
Indirect impacts:	N/A
Cumulative impact prior to mitigation:	N/A
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	N/A
Degree to which the impact can be avoided:	N/A
Degree to which the impact can be managed:	N/A
Degree to which the impact can be mitigated:	N/A
Proposed mitigation:	N/A
Residual impacts:	N/A
Cumulative impact post mitigation:	N/A
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	N/A

NO GO

The No-Go Alternative assumes that the proposed establishment of additional boat garages on Portion 6 of the Farm Stoffels Rivier No. 494 will not proceed, and the site will remain in its current state. Under this baseline scenario, current land uses will continue, and the site will remain free from construction-related disturbances such as vegetation clearing, earthworks, heavy vehicle movement, and infrastructure development. Consequently, direct physical impacts associated with the construction phase including temporary dust generation, noise, and localized visual disturbance will be completely avoided.

However, maintaining the baseline condition does not equate to an undisturbed or pristine ecological state. Site investigations reveal that the central study area has a distinct history of human disturbance, including historical vegetation clearing and ongoing infestations of invasive alien plants (IAPs), predominantly *Acacia cyclops* (Rooikrans). Under the No-Go Alternative, existing alien plant infestations and site degradation will persist without the mandatory, structured alien clearing and long-term management commitments that would otherwise be enforced through the project's Environmental Management Programme (EMPr). Over time, unmanaged alien vegetation could spread further into surrounding secondary and primary fynbos communities.

From a socio-economic perspective, the No-Go Alternative avoids short-term construction nuisances for neighbouring residents. However, it also means that no short-term localized employment or skills development opportunities will be created during construction. Furthermore, the opportunity to provide additional secure, organized boat storage for the Breede Riverine Body Corporate and the local river-based recreational economy will be foregone.

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

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

Summary of the Findings:

- → The National Web-Based Screening Tool Report identify the site with Medium Sensitivity for plants species theme and Very High for Terrestrial Biodiversity Theme.
- → According to South African National Vegetation Map (2024) the vegetation onsite is mapped as Potberg Ferricrete Fynbos vegetation.
- → Ground-truthing also confirmed that the study area supports Potberg Ferricrete Fynbos (Critically Endangered).
- → A total of 96 plant species were recorded through online databases (e.g., POSA and iNaturalist) and through site survey conducted by the botanist.
- → The botanical survey also confirmed 9 plant species of conservation concern, including, *Agathosma foetidissima* (Near Threatened), *Adenandra gummifera* (VU), *Agathosma minuta* (EN), *Aspalathus rosea* (EN), *Hermannia lavandulifolia* (VU), *Ixia capillaris* (NT), *Massonia setulosa* (NT), *Selago ramosissima* (EN), and *Drosanthemum autumnale*.
- → The primary natural vegetated area on the western portion of the property is characterised by climax composition and low historical disturbance, this area has been assigned with a Site Ecological Importance score of Very High and designated as a No-go.

- → The secondary vegetated area on the central portion of the property is subjected to past clearance prior to 2009 and *Acacia cyclops* infestation followed by recent flood sediment deposition. This portion of the property is therefore, assigned with a Site Ecological Importance score of Medium.
- → The existing boat garage margins cleared tracks, and all the existing transformed areas have been assigned a Site Ecological Importance score of Very Low.
- → Two layout alternatives (Alternative 1 and Alternative 2 – Preferred) have been assessed, with Alternative 2 being a preferred option.
- → The proposed development area is located above 45m contour and more than 100m from the High-Water Mark of the Breede Rivier Estuary.
- → The location of the proposed garage blocks is well situated more than 32m from the mapped wetlands and watercourses.

Mitigation measures recommended by the botanical specialist:

- → Any landowners must adhere to their legal obligations to actively eradicate and manage alien vegetation infestations present on the applicable and surrounding properties.
- → SCC and/or protected plant species should be avoided wherever possible. If individuals cannot be avoided, then a permit for their destruction must be obtained from the relevant local authority.
- → No plant species, whether native or exotic, should be brought into, or removed from, the study area, to prevent the spread of exotic or invasive species or the illegal collection of plants.
- → No plants may be translocated or otherwise uprooted or disturbed for rehabilitation or other purposes without express permission from the Contractor's EO or without the relevant permits.
- → Blanket clearing of vegetation must be limited to the proposed footprint, and only where necessary; no clearing outside of permitted areas may take place.
- → Clearing of vegetation should be minimized and avoided where possible.
- → Immediately rehabilitate all areas outside of the proposed development site that were disturbed and implement mitigation measures to prevent associated impacts from re-occurring.
- → IAPs, wherever present, must be cleared as per NEM:BA requirements where applicable and must not be allowed to spread.
- → Clearing methods should aim to keep disturbance to a minimum and must be undertaken in accordance with relevant guidelines.
- → Any area that is cleared of IAPs must receive regular follow-up treatments (preferably at least three follow-ups) to ensure that populations do not re-establish after such initial clearing efforts.
- → Any chemicals/herbicides used during clearing efforts must strictly be used only in accordance with the manufactures guidelines.
- → Under no circumstances should unqualified persons be allowed to conduct IAPs clearing using chemicals/herbicides or dangerous equipment without supervision from a suitably qualified pest control officer. Such a qualified pest control officer must be present on site at all times during IAPs clearing.
- → No planting or importing of any alien species to the site for landscaping, rehabilitation, or any other purpose should be allowed.
- → Avoid unnecessary damage to vegetation wherever possible.
- → Any signs of erosion resulting from the project activities must be rectified immediately and monitored thereafter to ensure that there is no re-occurrence.
- → All affected areas resulting from the proposed activities, and that are not part of the proposed activities, should be re-vegetated with locally occurring native species to bind the soil and limit erosion potential.
- → Avoid No-Go areas wherever possible.

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

Terrestrial Biodiversity Impact Assessment

Mitigation measures

- → Any landowners must adhere to their legal obligations to actively eradicate and manage alien vegetation infestations present on the applicable and surrounding properties.
- → SCC and/or protected plant species should be avoided wherever possible. If individuals cannot be avoided, then a permit for their destruction must be obtained from the relevant local authority.
- → No plant species, whether native or exotic, should be brought into, or removed from, the study area, to prevent the spread of exotic or invasive species or the illegal collection of plants.
- → No plants may be translocated or otherwise uprooted or disturbed for rehabilitation or other purposes without express permission from the Contractor's EO or without the relevant permits.
- → Blanket clearing of vegetation must be limited to the proposed footprint, and only where necessary; no clearing outside of permitted areas may take place.
- → Clearing of vegetation should be minimized and avoided where possible.
- → Immediately rehabilitate all areas outside of the proposed development site that were disturbed and implement mitigation measures to prevent associated impacts from re-occurring.
- → IAPs, wherever present, must be cleared as per NEM:BA requirements where applicable and must not be allowed to spread.
- → Clearing methods should aim to keep disturbance to a minimum and must be undertaken in accordance with relevant guidelines.
- → Any area that is cleared of IAPs must receive regular follow-up treatments (preferably at least three follow-ups) to ensure that populations do not re-establish after such initial clearing efforts.
- → Any chemicals/herbicides used during clearing efforts must strictly be used only in accordance with the manufactures guidelines.
- → Under no circumstances should unqualified persons be allowed to conduct IAPs clearing using chemicals/herbicides or dangerous equipment without supervision from a suitably qualified pest control officer. Such a qualified pest control officer must be present on site at all times during IAPs clearing.
- → No planting or importing of any alien species to the site for landscaping, rehabilitation, or any other purpose should be allowed.
- → Avoid unnecessary damage to vegetation wherever possible.
- → Any signs of erosion resulting from the project activities must be rectified immediately and monitored thereafter to ensure that there is no re-occurrence.
- → All affected areas resulting from the proposed activities, and that are not part of the proposed activities, should be re-vegetated with locally occurring native species to bind the soil and limit erosion potential.
- → Avoid No-Go areas wherever possible.

3.	List the specialist investigations and the impact management measures that will **not** be implemented and provide an explanation as to why these measures will not be implemented.

None that the EAP is aware.

4.	Explain how the proposed development will impact the surrounding communities.

The Boat Garage blocks development is located on Portion 6 of Farm Stoffels Rivier No. 494, within the Malgas area on the Breede River, within the Swellendam Municipal area (Overberg District Municipality). The surrounding community is predominantly rural, comprising farming operations, smallholdings, and a small, dispersed residential and tourism-oriented population associated with the Malgas village and the Breede River recreational

corridor. Given the scale and nature of the development, the socio-economic impacts are assessed as localised and largely construction-phase in nature, with limited but positive operational-phase effects.

Construction Phase

- Temporary employment opportunities for local labour and use of local contractors/suppliers during construction would provide a short-term positive economic benefit to the Malgas and broader Swellendam area, where formal employment opportunities are limited.

- Construction vehicle movement on local access roads may cause temporary disturbance (dust, noise, road wear) to neighbouring farms and residents using the same access routes. This is considered a low-significance, short-term impact, manageable through standard construction traffic management.

- Construction activity may generate temporary noise and visual intrusion for neighbouring properties and river users, mitigated through standard construction-phase controls (working hours, silencers, screening).

Operational Phase

- The facility would support recreational boating and angling tourism associated with the Breede River, indirectly benefiting local tourism-related businesses (accommodation, boat launch services, guiding, retail) in Malgas and the wider Breede River Valley.

- Given the development's confinement to an already degraded, alien-infested footprint above the 45 m contour and setback from the estuary HWM, the change to the visual character experienced by surrounding landowners and river users is expected to be limited.

- Increased boat storage capacity may result in a modest increase in vessel traffic on the Breede River, with a potential cumulative effect on river user experience (congestion at the jetty/launch point, wake, noise) shared by neighbouring riparian landowners and other recreational users. This should be assessed cumulatively with existing boat storage/launch facilities in the area.

- The rural and relatively undeveloped character of this stretch of the Breede River is a factor in local sense of place and property value for surrounding landowners. Any incremental development of this nature contributes to a cumulative change in this character, even where the individual footprint is small.

5.	Explain how the risk of climate change may influence the proposed activity or development and how has the potential impacts of climate change been considered and addressed.

Regional Climate Context

The Western Cape Climate Change Response Strategy: Vision 2050 (WCCCRS, 2023), sets out the province's vision to achieve net-zero emissions and climate resilience for the province by 2050, and provides the overarching policy framework guiding climate response and implementation across sector departments and municipalities, supported by an Implementation Plan detailing response actions, role players and monitoring arrangements. According to the Western Cape Department of Environmental Affairs and Development Planning, the province can expect more hot days and heat waves, higher minimum and maximum temperatures, fewer cold and frost days, reduced average rainfall (particularly in the western parts of the province), and an increase in the frequency and intensity of extreme weather events including floods, droughts and storm surges.

At a district, the Overberg District Municipality Climate Change Adaptation Summary Report which covers Swellendam, Cape Agulhas, Overstrand and Theewaterskloof local municipalities indicates that the District is

projected to experience low to medium range warming across most of its area, with the far northeast tip facing medium to high range warming. According to CSIR (2019) projections modelled for the Overberg District under the RCP 8.5 emissions scenario, shows rising annual average temperatures and shifting annual average rainfall across the district through 2050, with increases in the number of extreme rainfall days likely to result in more intense storms and flooding events.

These trends are consistent with the Western Cape SmartAgri Plan's updated climate change trends and projections, compiled by the Climate System Analysis Group at the University of Cape Town, which finds that average temperatures in the Western Cape have risen at 1.2 times the global average rate, with hot extremes increasing and cold extremes decreasing over the historical record, and that decreasing rainfall should be expected across most of the province, with rising temperatures bringing significant water balance challenges even where rainfall decline is not pronounced. Provincial authorities have also reported a marked recent increase in the frequency of climate-related disaster events: the Western Cape experienced four flooding events, multiple major fires, and a weather-related regional electricity blackout between June 2023 and June 2024 alone, compared with historically one or two major events per year, with associated disaster management costs rising accordingly.

Influence of Climate Change on the proposed development

Climate change risk has informed both the siting and the design response of the proposed development. Most significantly, the development has been deliberately located above the 45 m contour and more than 100 m from the High-Water Mark of the Breede River Estuary. This siting decision provides a substantial margin above current flood lines and is intended to accommodate the increased flooding risk associated with the rise in extreme rainfall days projected for the Overberg district under current CSIR and Climate System Analysis Group modelling, rather than relying on historical flood assumptions alone. Confining most of the development to the already degraded footprint further limits the area of exposed soil at any given time, reducing erosion risk under the higher-intensity rainfall conditions projected for the district.

Construction-phase mitigation measures set out elsewhere in the EMPr directly address several of these risks. Temporary sediment control and stormwater management measures have been specified to address the risk of higher-intensity rainfall events during construction, while the clearing and ongoing control of *Acacia cyclops*, a highly flammable, fire-adapted invasive species, reduces standing fuel load on site and directly addresses the elevated wildfire risk associated with the district's warming trend. Complementary fire risk management measures, including safe handling of cleared biomass and the availability of firefighting equipment during clearing operations, further reduce this risk.

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

None

7.	Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.

Terrestrial Biodiversity Impact Assessment

The integration of specialist input into the project lifecycle commenced during the pre-application phase through close collaboration with the appointed Terrestrial Biodiversity and Plant Species Specialist. Although the DFFE National Web-based Environmental Screening Tool initially flagged the study area as having Very High Sensitivity for the Terrestrial Biodiversity Theme and Medium Sensitivity for the Plant Species Theme due to overlapping Critical Biodiversity Area (CBA1) spatial layers, detailed field ground-truthing revealed significant site-specific ecological heterogeneity. Ground-truthing confirmed that while the broader property contains Critically Endangered Potberg

Ferricrete Fynbos, the central development area consists of secondary vegetation recovering from pre-2009 mechanical clearing and 2022 alien tree clearing (*Acacia cyclops*), as well as modified ground containing sediment stockpiled following the May 2026 Breede River flood event.

Through a fine-scale Site Ecological Importance (SEI) assessment, the specialist refined the spatial sensitivity map across the property into three distinct ecological zones. The western primary natural fynbos features intact climax composition supporting Threatened plant Species of Conservation Concern (SCC) such as *Selago ramosissima* (EN) and *Agathosma minuta* (EN) verified as True CBA1 (Very High SEI) and designated as a strict, permanent No-Go conservation zone. The central secondary vegetation corridor represents a recovered community following past disturbance, reclassified as CBA2 / ESA1 (Medium SEI) and suitable for managed infill development. Lastly, transformed footprints and existing infrastructure margins comprising cleared tracks, garage perimeters, and flood sand stockpiles were reclassified as ESA2 / Transformed (Very Low SEI).

The initial proposal (Alternative 1) placed structures directly into intact western fynbos, causing the loss of 0.1825 ha of native vegetation, including 0.0334 ha of primary CBA1 habitat. In direct response to specialist recommendations, the applicant reconfigured the spatial layout to establish. Alternative 2 achieves 100% spatial avoidance of primary CBA1 natural fynbos. Under Preferred Alternative 2, native vegetation clearance is strictly restricted to 0.1139 hectares of secondary vegetation (CBA2/ESA1) while maximizing the utilization of 0.1261 hectares of modified land (ESA2).

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

The mitigation hierarchy, comprising avoidance, minimisation and rehabilitation, was systematically applied in identifying the Best Practicable Environmental Option (BPEO) for the proposed additional boat garages on Portion 6 of the Farm Stoffels Rivier No. 494. Two layout alternatives were considered, namely Alternative 1, which represents the original ten-unit layout, and Alternative 2, which represents the refined layout developed with input from the botanical specialist. Alternative 1 provides for ten proposed boat garages within the approximately 1.3 ha boat garage blocks. Alternative 2 was subsequently developed and refined in response to the environmental sensitivities identified through the botanical assessment and site sensitivity verification process.

The assessment of the two alternatives demonstrates the application of the mitigation hierarchy as the development layout was progressively refined to avoid sensitive environmental features where practicable, minimise unavoidable impacts, and provide for rehabilitation of areas temporarily disturbed during construction. The botanical specialist's use of detailed digital mapping was particularly important in informing the positioning of the proposed boat garages and refining Alternative 2 in relation to the site's ecological and physical constraints. These included the presence of Critically Endangered Potberg Ferricrete Fynbos, the site's topographical contours, non-perennial drainage features and the property's location in proximity to the Breede River Estuary.

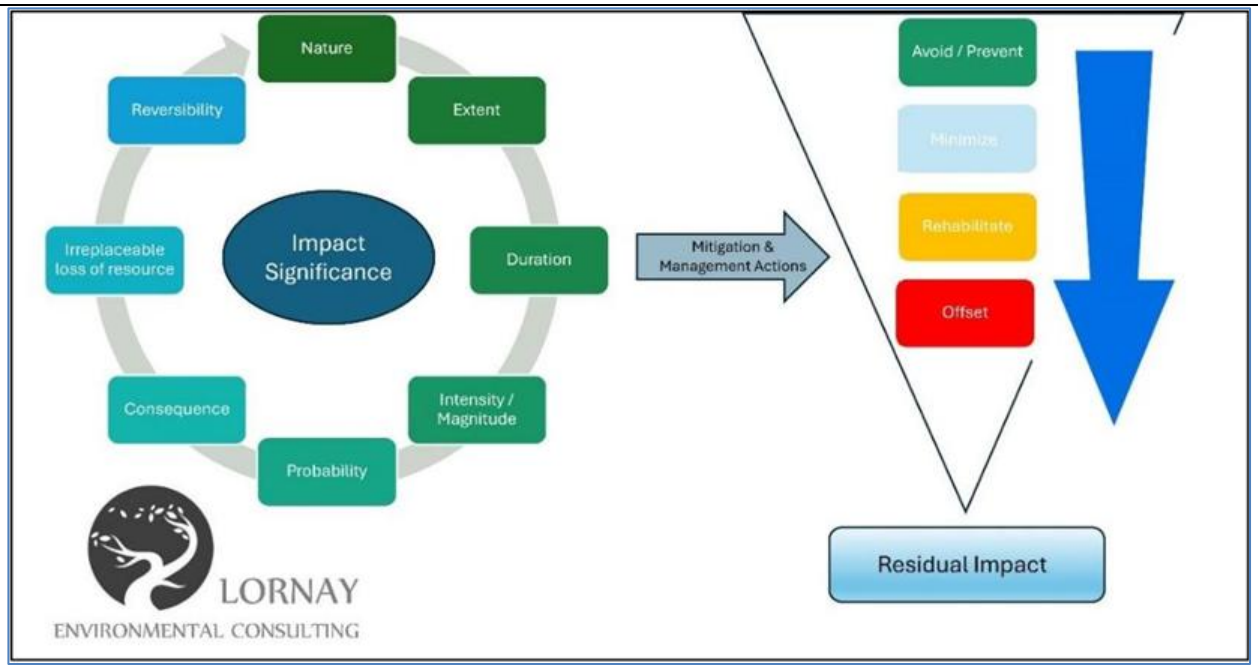


Figure 18: Mitigation Hierarchy.

Avoidance

Avoidance represents the primary and most effective tier of the mitigation hierarchy and was applied as the initial step in reconfiguring the site layout. Broad desktop spatial layers originally designated the entire subject property as Critical Biodiversity Area 1 (CBA1: Terrestrial), however, specialist field verification confirmed that the site exhibits distinct ecological zonation. The western portion of the site supports an intact climax primary natural fynbos patch harboring plant SCC, such as *Selago ramosissima* (EN) and *Agathosma minuta* (EN), which was verified as true CBA1 (Very High SEI) and designated as a strict, permanent No-Go area. While Alternative 1 encroached directly into this primary fynbos (causing the direct loss of 0.1825 ha of native vegetation, including 0.0334 ha of primary CBA1 habitat), Alternative 2 achieved 100% spatial avoidance of primary natural CBA1 fynbos by shifting all structural footprints eastwards onto degraded areas. Furthermore, both layout alternatives deliberately maintain a buffer setback of more than 32 metres from all mapped non-perennial drainage lines and wetlands, while Preferred Alternative 2 is situated above the 45-metre geographical contour line and approximately 245 metres inland from the High-Water Mark (HWM) of the Breede River Estuary, avoiding direct interaction with dynamic estuarine, riparian, and flood-prone environments.

Minimisation

Where physical footprints could not completely avoid native vegetation, the minimisation principle was rigorously applied to reduce the extent, duration, and severity of potential environmental impacts. The applicant reconfigured the development scope from ten (10) garage blocks (50 units) under Alternative 1 down to eight (8) garage blocks (40 units) under Alternative 2, reducing the building footprint within the 1.3 ha layout envelope. Through true-scale digital mapping, Alternative 2 confines native vegetation clearance strictly to 0.1139 hectares of secondary recovered vegetation (CBA2/ESA1) and maximizes the utilization of 0.1261 hectares of modified and transformed area (ESA2), including river sand stockpiles deposited during the May 2026 Breede River flood event. Operational impacts are intrinsically minimized by designing the facility strictly for "dry" recreational storage, requiring zero water supply connections, ablution facilities, sewage pipes, or high-intensity night lighting. During construction,

impacts will be further minimized by enforcing strict working hours, dust suppression measures, and erecting Clearview perimeter fencing prior to earthworks to confine all activity strictly to the authorized footprint.

Rehabilitation

Rehabilitation forms the final component of the mitigation hierarchy and applies to all areas temporarily disturbed during the construction phase, as well as broader historical degradation across the development envelope. Under the framework of a binding Environmental Management Programme (EMPr), all construction working margins outside the final building footprints will be immediately stabilized and re-vegetated using locally occurring, indigenous fynbos species. Crucially, because the central corridor has suffered past disturbance and alien tree infestation (*Acacia cyclops*), implementing Preferred Alternative 2 legally binds the developer to an active Invasive Alien Plant (IAP) management protocol requiring a minimum of three follow-up treatments. This ensures that unmanaged flood sediment stockpiles and alien seedbanks are systematically controlled, turning a previously degraded corridor into a restored, alien-free boundary buffer.

Best Practicable Environmental Option

The comparative evaluation between Alternative 1 and Alternative 2 demonstrates that Preferred Alternative 2 provides a significantly stronger, fully compliant application of the mitigation hierarchy. By scaling down the structural footprint, achieving total avoidance of irreplaceable primary CBA1 natural fynbos, utilizing previously modified ground, respecting aquatic buffer setbacks, and committing to post-construction rehabilitation and alien control. Alternative 2 (preferred) successfully reduces residual direct, indirect, and cumulative ecological impacts to a Low significance level. Consequently, Alternative 2 represents the Best Practicable Environmental Option (BPEO), successfully balancing the verified socio-economic demand for recreational boat storage with statutory biodiversity preservation imperatives, rendering formal biodiversity offsets unnecessary and unwarranted.

SECTION J: GENERAL

1. Environmental Impact Statement

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

Findings of the EIA:

- → The site lies within the Potberg Ferricrete Fynbos vegetation type, which is listed as Critically Endangered (Red List of Ecosystems, 2022). The desktop (VegMap, 2024) analysis indicated possible overlap with Eastern Rûens Shale Renosterveld and Cape Lowland Alluvial Vegetation. Ground-truthing confirmed that only Potberg Ferricrete Fynbos occurs on site and within the proposed footprints.
- → The cleared areas have shown a notable degree of recovery and now support secondary Potberg Ferricrete Fynbos. The western portion of the property remains primary natural vegetation with minimal historical disturbance. The specialist rated its Site Ecological Importance as Very High and designated it a No-Go area. The secondary vegetation was rated Medium.
- → Ninety-six plant species were recorded, including nine Species of Conservation Concern (five of them threatened) and sixteen protected species. These include the Near Threatened *Agathosma foetidissima*, which is abundant across the secondary vegetation.

- → The site is mapped as a CBA1 (Terrestrial), which typically requires maintaining land in a natural state. The EIA findings influenced the layout to prioritize development on the already-degraded, alien-infested footprints to minimize the loss of functional CBA1 value.
- → The property is adjacent to the Breede River, a recognized FEPA river and part of an estuarine functional zone.
- → To safeguard water resources and manage flood risks, the development is positioned above the 45m geographical contour line and more than 100m from the High-Water Mark.
- → The project requires no new roads, stormwater infrastructure, sewage treatment, or electrical connections, thereby introducing no new discharge points or hardened surfaces that could negatively affect the river.
- → The Preferred layout (Alternative 2) involves the construction of eight (8) blocks and was refined based on specialist input. The garages are positioned primarily within historically degraded area, secondary vegetated areas, which is situated adjacent to the existing boat garages.
- → The proposal supports the established river-based tourism and recreational economy of Malgas and Stoffels river by providing secure storage for boats used in the corridor.
- → The construction phase is expected to generate short-term localized employment, and skills transfer for the community.
- → Because the garages are for storage only and require no bulk services, the development places no additional demand on municipal infrastructure.
- → The proposal supports the regional recreational boating and angling tourism economy in Malgas and the lower Breede River Valley by addressing a verified shortage of secure boat storage.
- → The project generates short-term local employment, temporary trade opportunities, and skills transfer during the construction phase.
- → Because the facility requires no municipal bulk services or infrastructure upgrades, this means no financial or operational burden on the Swellendam Municipality for the expansion of service infrastructure.

1.2.	Provide a map that that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2)

Appendix B.

1.3.	Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.

The proposed development involves the expansion of a boat storage garage facility on Portion 6 of the Farm Stoffels Rivier No. 494, Malgas, within the Breede Riverine Estate. The project encompasses the construction of eight (8) boat garage blocks housing forty (40) individual storage units under Alternative 2 (preferred). A comprehensive environmental impact assessment (EIA) and specialist botanical ground-truthing evaluated the environmental, socio-economic, and community impacts across the proposed development and its alternatives.

Environmental Impacts and Risks

Positive Impacts

- → Alternative 2 was reconfigured on the specialist's recommendation to avoid entirely the intact, primary natural Potberg Ferricrete Fynbos on the western portion of the site. This area is CBA1 and has a Very High Site Ecological Importance, and it is to be retained as a permanent No-Go area. It is also where the Endangered *Selago ramosissima* and *Agathosma minuta* were recorded. The majority of Species of Conservation Concern individuals lie outside the Alternative 2 footprint.

→ Alternative 2 limits clearing of indigenous vegetation to 0.1139 ha of secondary (recovered) vegetation. A further 0.1261 ha falls on critically and seriously modified ground, including flood sediment deposited after the May 2026 flood.
→ Authorisation of the project under an Environmental Management Programme (EMPr) legally binds the developer to an active IAP control program targeting species such as *Acacia cyclops* (Rooikrans), requiring a minimum of three follow-up treatments to deplete soil seedbanks.
→ The boat garages are situated entirely above the 45 m contour line, more than 245 metres inland from the Breede River Estuary High-Water Mark (HWM), and more than 32 metres from non-perennial drainage lines, the facility presents a negligible hydrological risk and requires no riverbank modification or in-stream works.
→ The proposed additional boat garages will be operating strictly as passive "dry" storage, as a result no municipal water supply, electricity grid expansions, ablution infrastructure, or sewage disposal systems will be required.

Negative impacts

→ Direct clearance of 0.1139 hectares of secondary recovering Potberg Ferricrete Fynbos (a Critically Endangered ecosystem type) within the development footprint.
→ Unavoidable loss of localized individuals of *Agathosma foetidissima* (Near Threatened), though the specialist noted this species occurs in high local abundance and demonstrates strong recolonization resilience on disturbed ground.
→ Minor, short-term risks of localized dust emissions, noise, soil erosion, and light machinery movement during earthworks and building assembly.

Socioeconomic impacts

Positive impacts

→ The additional boat garages addresses demand for secure recreational boat storage within the Breede Riverine Estate, supporting river-based recreation and tourism in Malgas and the lower Breede River.
→ The construction phase is expected to generate short-term local employment and trade opportunities and temporary skills transfer.
→ As the structures require no municipal bulk services, the development places no additional operational or financial burden on the Swellendam Municipality.

Negative impacts

→ A short-term increase in construction traffic and noise on the existing internal estate access road, affecting residents of the estate.
→ Possible increased boating activity on the estuary resulting from additional storage capacity.

2. Recommendation of the Environmental Assessment Practitioner ("EAP")

2.1.	Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMPr

The following overarching Impact Management Outcomes are based on the Plant Species and Terrestrial Biodiversity Impact Assessment and must guide implementation across all phases of the proposed development. They apply to the preferred layout (Alternative 2):

Outcome 1: Protection of the primary natural vegetation and No-Go zone

The intact, primary natural Potberg Ferricrete Fynbos in the western portion of the site (Very High Site Ecological Importance; Critical Biodiversity Area 1) is to be retained in full as a permanent No-Go area. No clearing, soil disturbance, stockpiling, vehicle access or storage of materials may occur within this area.

Outcome 2: Minimisation of vegetation clearance

All clearing, earthworks and construction traffic are to be confined to the authorised Alternative 2 footprint of approximately 1.3 ha. This comprises 0.1139 ha of secondary Potberg Ferricrete Fynbos and 0.1261 ha of critically and seriously modified land. No clearing may occur outside this footprint.

Outcome 3: Protection of plant Species of Conservation Concern and protected flora

Nine Species of Conservation Concern and sixteen provincially or nationally protected plant species were recorded on site. No Species of Conservation Concern or protected species may be damaged, destroyed, relocated or removed without the permit required from the competent authority. Avoidance is the primary measure. Search-and-rescue is a secondary measure, applied only under permit and only to species for which relocation is viable.

Outcome 4: Eradication and suppression of listed invasive alien plants

All listed invasive alien plants within the development footprint (*Acacia cyclops*, *A. saligna*, *A. mearnsii* and *Eucalyptus conferruminata*) are to be removed in accordance with the NEM:BA Alien and Invasive Species Regulations. This is to be followed by monitoring and repeat treatments to deplete soil-stored seedbanks and prevent re-establishment.

Outcome 5: Preservation of watercourse, estuarine and riparian systems

Spatial separation is to be maintained between all structures and the Breede River Estuary and any drainage lines. All structures are to be located above the 45 m contour and at the distances from the estuarine High-Water Mark and drainage lines.

Outcome 6: Land stabilisation and rehabilitation

Any erosion arising from project activities is to be remediated immediately. Disturbed margins outside the permanent footprint are to be rehabilitated with locally occurring indigenous species.

Mitigation measures provided by the EAP:

- → Development activities must be confined strictly to the degraded and secondary footprint areas identified in the assessment (Alternative 2).
- → Before any site preparation, all intact vegetation and sensitive areas, including the primary natural fynbos fragment, must be clearly demarcated as No-Go areas. This is to prevent encroachment by personnel, vehicles and equipment.
- → A pre-construction walk-down must be undertaken by a suitably qualified specialist or the Environmental Control Officer (ECO) before any vegetation clearance. Its purpose is to mark Species of Conservation Concern and protected species for avoidance and to identify individuals suitable for rescue under permit.
- → The single nationally protected tree (*Sideroxylon inerme* subsp. *inerme*), which lies outside both footprints, must be fenced and protected from damage during construction.
- → Invasive alien plants within the footprint must be cleared before or during construction using approved methods. At least three follow-up treatments are required. Herbicides may be applied only in accordance with manufacturers' guidelines and under supervision.

→ No plant species, native or exotic, may be brought onto or removed from the site. No alien species may be used for landscaping or rehabilitation.

→ No plants may be translocated, uprooted or disturbed for rehabilitation without the permission of the ECO and the relevant permits.

2.2.	Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.

Demarcation and Strict Protection of No-Go Conservation Zones

- Prior to any site establishment, vegetation clearing, or earthworks, the primary natural Potberg Ferricrete Fynbos patch located on the western portion of the property (verified as True CBA1) must be physically demarcated and barricaded using Clearview or visual warning fencing as a permanent No-Go conservation zone.
- A formal pre-construction site walkdown must be conducted by the Environmental Control Officer (ECO) or botanical specialist prior to site preparation to inspect the authorized footprint, verify No-Go fence placements, and mark plant Species of Conservation Concern (SCC) and protected flora.
- Special care and protective barricading must be established around the confirmed individual specimen of the nationally protected tree *Sideroxylon inerme* subsp. *inerme* (White Milkwood), located outside the development footprint, to prevent root compaction, physical damage, or material stockpiling under its canopy during construction.
- In accordance with NEM:BA Alien and Invasive Species (A&IS) Regulations, all listed IAP species (*Acacia cyclops*, *Acacia saligna*, *Eucalyptus conferruminata*) within the operational footprint must be systematically cleared.

2.3.	Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.

Based on the findings of the specialist assessments undertaken, the outcomes of the alternatives assessment, and the public participation process conducted for the proposed development, it is the reasoned opinion of the EAP that the proposed Boat Garage blocks development on Portion 6 of the Farm Stoffels Rivier No. 494, Malgas, should be authorised, subject to the findings presented in this application.

Firstly, the proposed development represents an extension of the existing, lawfully established land use on the subject property, and is consistent with the applicable Agricultural Zone 1 land use rights and the objectives of the Swellendam Municipality Integrated Development Plan (2022–2027). The Agricultural Zone 1 designation accommodates the proposed activity, and the property is of sufficient extent to accommodate the increasing demand for boat storage associated with growing visitor numbers to the area.

Secondly, the preferred layout Alternative 2, comprising eight (8) garage blocks has been sited to achieve 100% spatial avoidance of primary natural Critical Biodiversity Area 1 (CBA1) Potberg Ferricrete Fynbos on the western section of the property. Direct native vegetation clearance is strictly confined to 0.1139 hectares of secondary recovered vegetation (CBA2/ESA1) while maximizing the utilization of 0.1261 hectares of modified and transformed ground (ESA2), including flood sediment stockpiles deposited following the May 2026 Breede River flood event. Under these managed conditions, both direct and cumulative ecological impacts are reduced to a Low residual significance level, rendering formal biodiversity offsets unnecessary and unwarranted.

Recommended Conditions of Authorisation

Should the development be granted, it is recommended that the following conditions be included:

1. Development activities shall be strictly confined to the approved development footprint of approximately 1.3 ha, as reflected in the approved Site Development Plan (Alternative 2) and no encroachment into surrounding intact vegetation shall be permitted.
2. Clearview (Boroque-type) fencing shall be erected to demarcate the approved development footprint prior to the commencement of any construction activity and shall be maintained for the duration of construction.
3. A pre-construction walk-down must be undertaken by a suitably qualified specialist or the Environmental Control Officer (ECO) before any vegetation clearance. Its purpose is to mark Species of Conservation Concern and protected species for avoidance and to identify individuals suitable for rescue under permit.
4. The single nationally protected tree (*Sideroxylon inerme subsp. inerme*), which lies outside both footprints, must be fenced and protected from damage during construction.
5. No clearing of vegetation shall occur outside the demarcated development footprint. Prior to construction, the demarcated footprint shall be verified by a suitably qualified specialist to confirm alignment with areas of previously disturbed/degraded vegetation and avoidance of intact vegetation and SCC locations.
6. Alien vegetation removed as part of construction shall be managed in accordance with the EMPr, and disturbed areas shall be rehabilitated using indigenous vegetation upon completion of construction.
7. Construction activities shall be managed to prevent sedimentation, erosion, and stormwater runoff into the Breede River and associated drainage features; no stockpiling of construction material or spoil shall occur within 32 m of any watercourse.
8. All construction activities shall be restricted to daylight hours to minimise disturbance to surrounding residents and fauna.
9. Should any previously unrecorded heritage, palaeontological, or archaeological material be exposed during construction, work in that area shall cease immediately, and the find shall be reported to Heritage Western Cape in accordance with the National Heritage Resources Act, 1999.
10. The Holder of Environmental Authorisation shall retain records of compliance with the EMPr and conditions of authorisation and shall make these available to the competent authority upon request.

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

None that the EAP is aware of.

2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.

The holder must commence the listed activities onsite within a period of five (5) years from the date of issue of this Environmental Authorisation.
The development must be concluded within ten (10) years from the date of commencement of the first listed activity.

Conduct Environmental Audits yearly during the duration of the construction with one final construction audit at conclusion of construction.

11. Water

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.

The Western Cape is a water-scarce region subject to recurring drought conditions and municipal water restrictions. Accordingly, the proposed development must incorporate water-sensitive design and operational practices to

minimise reliance on potable (municipal) water supply, reduce overall water demand, and maximise opportunities for water reuse and recycling, throughout both the construction and operational phases.

Construction phase

→ Where feasible the use of non-potable water sources for related construction related activities (e.g dust suppression, compaction, general site washing) in preference to municipal potable supply, subject to confirmation of water use authorisation/registration requirements with BOCMA where applicable.
→ Rainwater harvested from temporary site structures (e.g. site office/ablution roofing) be collected
→ Avoid unnecessary washing down of vehicles, equipment, or surfaces using potable water; use of dry-cleaning methods (sweeping, brushing) to be prioritised.

12. Waste

Explain what measures have been taken to reduce, reuse or recycle waste.
Waste will be separated onsite via the bins allocated for each type of waste. Additionally, all related water will be collected onsite and disposed of at a registered waste facility.

13. Energy Efficiency

8.1.	Explain what design measures have been taken to ensure that the development proposal will be energy efficient.
No Alternative energy designs have been proposed for the development. The development is mainly limited to the construction of boat garages and therefore, no energy will be required for the proposed development.	

SECTION K: DECLARATIONS

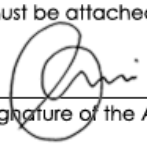
DECLARATION OF THE APPLICANT

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

I PJ Naude, ID number 6505235054089 in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
  - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - Legitimate costs in respect of specialist(s) reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.



02/10/2026

Signature of the Applicant: Date:

The Breede Riverine Body Corporate

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I MICHELLE NAYLOR EAP Registration number 2019/698 as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this BAR and any other documents/reports submitted in support of this BAR;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;



06-10-2026

Signature of the EAP: Date:

LORNAY ENVIRONMENTAL CONSULTING

Name of company (if applicable):

DECLARATION OF THE REVIEW EAP

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

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

Signature of the EAP: Date:

Name of company (if applicable):

DECLARATION OF THE SPECIALIST

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

I Dr. Jan-Hendrik Keet, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
  - ~~am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);~~
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.



04 October 2026

Signature of the Specialist: Date:

EcoFloristix Specialist Botanical Surveys (trading under Acuity JRK Pty Ltd)

Name of company (if applicable):

DECLARATION OF THE REVIEW SPECIALIST

I ……., as the appointed Review Specialist hereby declare/affirm that:

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

Signature of the EAP: Date:

Name of company (if applicable):