LORNAY
ENVIRONMENTAL CONSULTING

DRAFT BIODIVERSITY OFFSET REPORT:

PAAPEKUILSFONTEIN CONSERVATION MASTER PLAN

Proposed Residential Development and Associated Infrastructure on Erf 3495, Struisbaai

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Property	Erf 3495, Struisbaai (12.22 ha), Cape Agulhas Municipality
Competent authority	Department of Environmental Affairs and Development Planning (DEA&DP), Western Cape
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1. INTRODUCTION

1.1. Background to the project

Lornay Environmental Consulting (Pty) Ltd has been appointed by Helemika Number 1 (Pty) Ltd (hereafter referred to as "the applicant") to apply for Environmental Authorisation in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), for the proposed residential development on Erf 3495, Struisbaai, known as Bella Vista.

Erf 3495 is 12.22 ha in extent and is located on the south-western edge of Struisbaai, within the urban edge. It is bounded by Adelle Street to the east, the municipal water reservoirs and Noreen Street to the south, and the Remainder of Farm Paapekuilsfontein No. 281 (RE/281) to the west and north. The application entails the rezoning of the property from Agricultural Zone to Subdivisional Area and its subdivision into single residential erven, private streets, private open space and an Open Space (Conservation Area, Erf 80). The preferred layout (Alternative 2) confines development to the southern and central portions of the property and retains the northern 3.96 ha (32.7%) as Erf 80, a single no development area which adjoins the natural habitat on RE/281.



Figure 1: Locality of Erf 3495, Struisbaai.

The entire property supports Agulhas Limestone Fynbos, a vegetation type listed as Critically Endangered in the Revised National List of Ecosystems that are Threatened and in need of Protection (GN 2747, Government Gazette No. 47526, 18 November 2022). Almost the entire property is mapped as a Critical Biodiversity Area 1 (CBA1) in the Western Cape Biodiversity Spatial Plan (2023). The property also supports a subpopulation of the Endangered *Mimetes saxatilis* at the eastern limit of its distribution. The Botanical and Terrestrial Biodiversity Impact Assessment (McDonald, 2026) and the Terrestrial Animal Site Sensitivity Verification and Species Specialist Assessment (Venter & Swart, November 2026) confirm that, after the full application of the mitigation hierarchy, the development of Alternative 2 will result in the permanent loss of approximately 8.15 ha of Critically Endangered vegetation and CBA1 habitat, with a residual impact of Medium Negative significance.

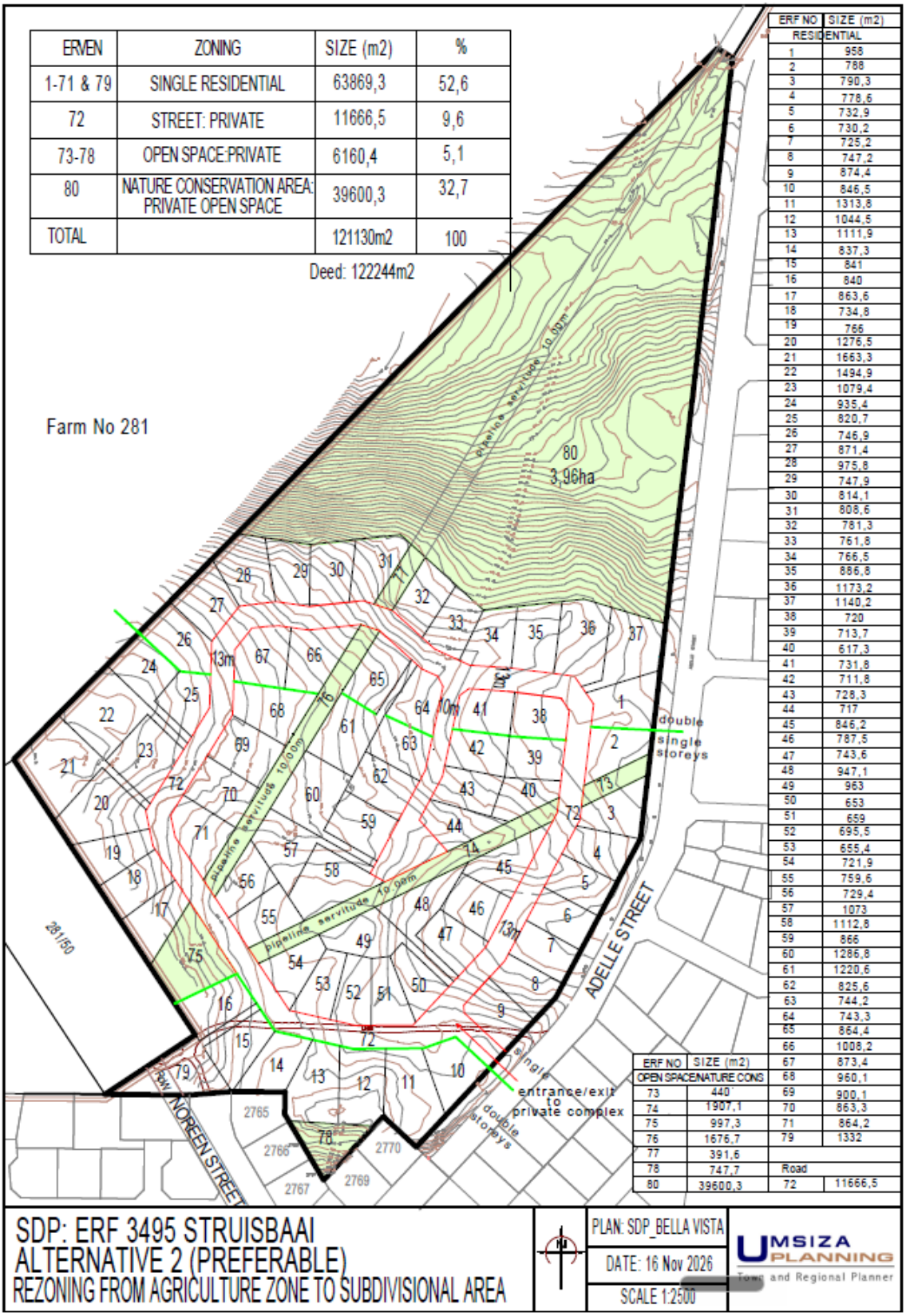


Figure 2: Preferred layout (Alternative 2).

In terms of Chapter 6.2 of the National Biodiversity Offset Guideline (2023), a biodiversity offset is required where residual negative impacts on biodiversity are of medium or high significance.

The botanical specialist supports the proposed Struisbaai Conservation Master Plan, which proposes approximately 327 ha of conservation areas on RE/281, as the appropriate mechanism to address the residual impacts at a landscape scale, subject to specific conditions. The faunal specialists treat the Master Plan as additional landscape-scale mitigation, and leave the need for any further conservation mechanism to the competent authority. This Biodiversity Offset Report determines the offset requirement for the proposed development in accordance with the National Biodiversity Offset Guideline (2023), identifies and evaluates the proposed offset sites, and sets out the mechanism through which the selected offset site is to be secured in perpetuity, namely declaration as a Nature Reserve in terms of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) (NEM:PAA) through the CapeNature Biodiversity Stewardship Programme (Level 3).

It is emphasised that, in accordance with Chapter 5.1.1 of the National Biodiversity Offset Guideline, a biodiversity offset may never be used as a reason why an environmental authorisation should be granted. The offset proposed in this report is a mitigation measure, which must be implemented only if the competent authority decides to grant environmental authorisation on the merits of the application as a whole.

1.2. Purpose and scope of the report

This report has been compiled in accordance with Chapter 7 of the National Biodiversity Offset Guideline, which sets out the steps for determining biodiversity offset requirements and the minimum content of a Biodiversity Offset Report. It is submitted together with the Basic Assessment Report (BAR), and addresses the following:

- → the application of the mitigation hierarchy, the justification for the offset and the reasons why the No-Go alternative is not recommended;
- → the significance of the residual negative biodiversity impacts, and the degree of risk that those impacts cannot be offset;
- → the basic and adjusted offset ratios, the unique or special biodiversity features that affect the offset requirement, and an explicit statement of the required size of the offset;
- → the biodiversity outcomes required on the offset site;
- → the portfolio of candidate offset sites, their availability and feasibility, and the reasons for the selection of the proposed offset site;
- → the legal mechanism for securing the offset site, the conceptual management and financial planning for the offset, and the Biodiversity Offset Implementation Agreement;
- → engagement with conservation authorities and interested and affected parties; and
- → recommended conditions of authorisation and the actions required to give effect to the offset.

1.3. Process status

The status of the environmental and heritage processes relevant to this report is as follows:

1. The Basic Assessment process is in progress, and the first round of public participation (PPP1) is being undertaken in November 2026.
2. A Notification of Intent to Develop was submitted to Heritage Western Cape, and a draft Heritage Impact Assessment has been compiled for comment.
3. The specialist studies informing this report (botanical and terrestrial biodiversity, faunal, palaeontological, visual, agricultural and traffic) have been completed in draft or final form.
4. The Paapekuilsfontein Master Plan is a draft concept option for the Paapekuilsfontein landholding, to be further refined with input from SANParks and CapeNature. It has not yet been approved by CapeNature or SANParks, and the proposed conservation areas have not yet been legally secured.

2. LEGISLATIVE AND POLICY FRAMEWORK

The following legislation, guidelines and policies are relevant to the determination and implementation of the biodiversity offset:

Instrument	Relevance to the offset
National Biodiversity Offset Guideline (GN 3569 of 23 June 2023).	Sets out when an offset is required, the principles of offsetting (including like-for-like, additionality and permanence), default offset ratios by ecosystem threat status, acceptable securing mechanisms and the minimum content of an offset report.
Western Cape Guideline on Biodiversity Offsets (DEA&DP, 2015)	Provincial guidance on offset ratios, modifying factors (including habitat condition) and the role of Cape Nature in determining offset requirements.
National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)	Listing of Agulhas Limestone Fynbos as Critically Endangered (GN 2747 of 18 November 2022) and protection of threatened species.
National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003)	Provides for the declaration of private land as a Nature Reserve by the MEC with the agreement of the landowner, consultation requirements, endorsement of the title deed, assignment of a management authority and the preparation of a management plan.
Western Cape Biodiversity Spatial Plan (Cape Nature, 2023)	Mapping of CBA1 on Erf 3495 and RE/281, with the management objective of no further loss of natural habitat.
National Protected Area Expansion Strategy	Erf 3495 and the surrounding landscape fall within a focus area for protected area expansion, within the buffer of Agulhas National Park.
Cape Nature Biodiversity Stewardship Programme	The provincial mechanism through which private and communal land of high biodiversity value is secured through voluntary agreements with landowners, including declaration as a Nature Reserve.

3. ASSUMPTIONS AND LIMITATIONS

This report is based on the best information available at the time of reporting, and the following assumptions and limitations apply:

- → The baseline information is drawn from the specialist studies undertaken for the project, the National Vegetation Map (2024), the Red List of Ecosystems (2022) and the Western Cape Biodiversity Spatial Plan (2023). It is assumed that the specialists applied appropriate methodologies and that their findings are accurate within the scope of their surveys.
- → The extent of the development footprint (8.15 ha) is taken from the zoning schedule of the Alternative 2 layout. It may change marginally during the process and following from public participation.
- → The Paapekuilsfontein Conservation Master Plan is a conceptual working plan. The extent, boundaries, corridors and management arrangements of the proposed conservation areas have not been finalised or surveyed, and the vegetation and species of conservation concern within them have not yet been verified in the field at the level required to confirm offset equivalence.

→ The Remainder of Farm Paapekuilsfontein No. 281 (RE/281), on which a large portion of the offset site is located, is owned by the developer. The proposed development area and approx. 4 ha of open space as well as the candidate offset site, is therefore under the control of the applicant, and its availability does not depend on negotiation with a third-party landowner.

→ The determination of the final offset ratio, the adequacy of the offset site and the acceptability of the securing mechanism rests with the competent authority, informed by Cape Nature and SANParks. Cape Nature's right to revise its position on receipt of further information is acknowledged.

4. RECEIVING ENVIRONMENT

4.1. Vegetation type and ecosystem status

The entire extent of the subject property, Erf 3495, is mapped as Agulhas Limestone Fynbos in the National Vegetation Map (2024), and this was confirmed in the field by the botanical specialist during surveys undertaken on the subject property. Agulhas Limestone Fynbos is a species-rich vegetation type restricted to the calcareous soils of the Bredasdorp Group on the Agulhas Plain and is listed as Critically Endangered. On Erf 3495 the vegetation is mid-high to tall proteoid–asteraceous fynbos, with emergent proteoids and a prominent restioid understorey, and includes limestone pavements and outcrops that support many limestone endemics.

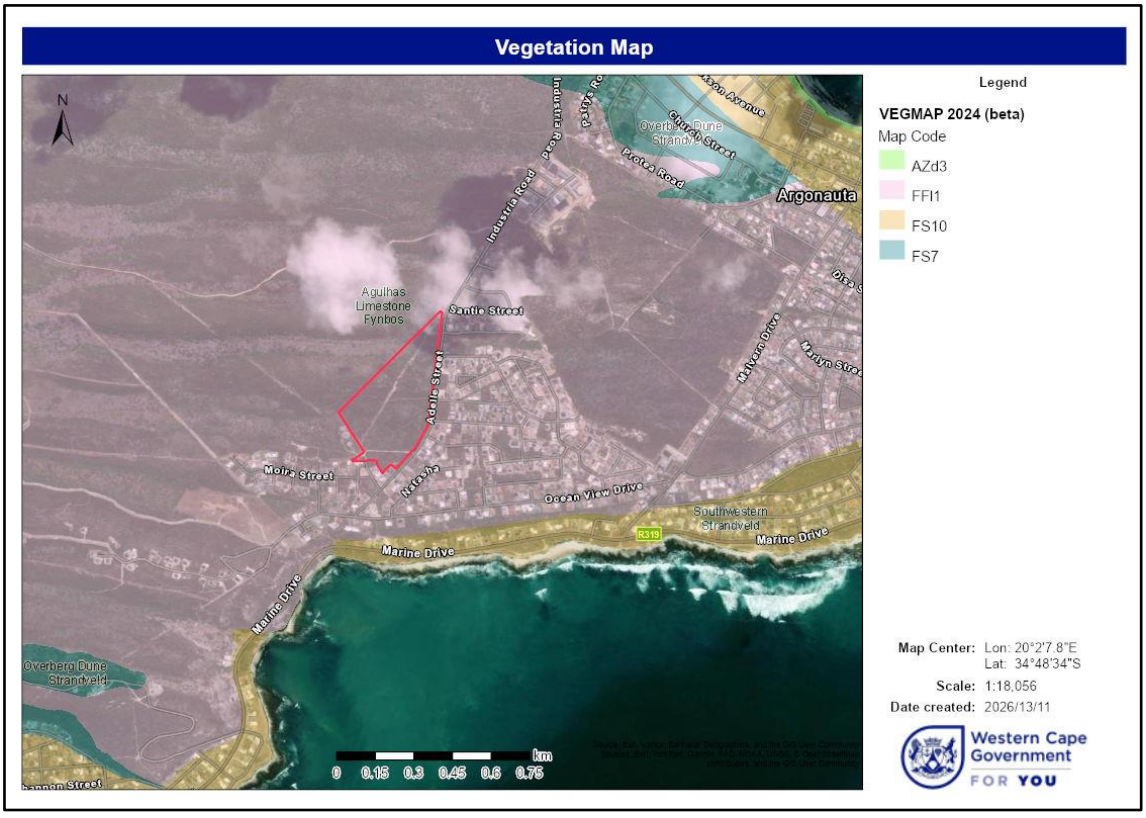


Figure 3. 2024 National Vegetation Map showing that the entire subject property is mapped as Agulhas Limestone, Critically Endangered ecosystem type.

In the look up table in Annexure A of the National Biodiversity Offset Guideline, Agulhas Limestone Fynbos is listed as Critically Endangered, with a Remaining Ecosystem Extent of 92% and an Ecosystem Protection Level of Poorly Protected. Its Critically Endangered status therefore arises from its restricted geographic distribution and the ongoing pressures on it, rather than from a large reduction in extent. The national guideline notes that a restricted geographic distribution may justify a higher basic offset ratio.

The vegetation on Erf 3495 is in fair to good condition. Disturbance is confined to the informal tracks, the two municipal pipeline servitudes, a disturbed area adjacent to the reservoirs, and patches invaded by *Acacia cyclops, Acacia saligna* and *Myoporum sp*. Outside these areas, the fynbos is largely intact, although mature and, in places, senescent owing to the long absence of fire. The Red List of Ecosystems maps the natural vegetation on the property as a remnant of a Critically Endangered ecosystem.



Photo 1. Mature, species-rich Agulhas Limestone Fynbos on Erf 3495.



Photo 2. Exposed calcrete (limestone) habitat that supports many limestone endemics.

4.2. Plant species of conservation concern

The following plant species of conservation concern and limestone endemics were recorded on the property by the appointed botanical specialist (McDonald, 2026):

Table 1. Plant species of conservation concern recorded on Erf 3495.

Species	Red List status	Notes
Mimetes saxatilis	Endangered	Limestone endemic at its eastern distribution limit at Struisbaai. Recorded within the development footprint. Population not quantified. Cannot be transplanted.
Leucospermum patersonii	Vulnerable	Limestone endemic.
Gladiolus miniatus	Vulnerable	Endemic geophyte.
Gladiolus variegatus	Vulnerable	Endemic geophyte.
Leucadendron meridianum	Near Threatened	Limestone endemic, widespread on the property.
Leucadendron muirii	Near Threatened	Limestone endemic.
Protea obtusifolia	Near Threatened	Limestone endemic, closely associated with M. saxatilis.
Leucospermum truncatum	Near Threatened	Limestone endemic.



Photo 3. *Mimetes saxatilis* (Endangered) on Erf 3495.



Photo 4. The flower head of the *Mimetes saxatilis*.

4.3. Biodiversity Spatial Plan and landscape context

Almost the entire property is mapped as CBA1 in the Western Cape Biodiversity Spatial Plan (2023), with a small degraded area adjacent to the reservoirs. The management objective for a CBA1 is to maintain the area in a natural or near-natural state, with no further loss of natural habitat. The National Web-based Environmental Screening Tool rates the terrestrial biodiversity sensitivity of the property as Very High, triggered by the CBA1 classification, the Critically Endangered vegetation, the National Protected Area Expansion Strategy focus area and the SANParks buffer of Agulhas National Park.



Figure 4: Western Cape Biodiversity Spatial Plan (2023) showing the subject property falling within the Critical Biodiversity Area 1 (terrestrial).

Erf 3495 lies at the eastern end of a continuous tract of Agulhas Limestone Fynbos that extends westwards over Paapekuilsfontein (RE/281) towards the protected areas of Agulhas National Park. The botanical specialist identifies the connection between the urban edge of Struisbaai and Agulhas National Park as the principal function of the CBA1 in this area. The ecological processes that sustain the vegetation, namely fire, pollination by birds and insects, and the dispersal of seed by indigenous ants, depend on the persistence of large, connected areas of natural habitat.

4.4. Fauna and ecological connectivity

The Terrestrial Animal Site Sensitivity Verification and Species Specialist Assessment (Venter & Swart, November 2026) assigns a High overall Site Ecological Importance to the faunal habitats and ecological processes on the property. Site Ecological Importance is High for the habitat of the Black Harrier, the Southern Adder and the Scarce Mountain Copper, and for faunal landscape connectivity, and Medium for Denham's Bustard, the Southern Black Korhaan and the Fynbos Buttonquail. Species recorded on the property during the faunal survey include Cape Grysbok, Cape Golden Mole, Angulate Tortoise, the Rûens Velvet Worm and a diverse fynbos bird assemblage. A broader faunal investigation of the Paapekuilsfontein landholding confirmed that faunal movement, habitat connectivity and cumulative habitat loss operate at a scale well beyond the boundaries of Erf 3495.

5. APPLICATION OF THE MITIGATION HIERARCHY

5.1. Application of the mitigation hierarchy

The first principle of the National Biodiversity Offset Guideline is that offsets are the final option in the mitigation hierarchy, and may only be considered once avoidance, minimisation and rehabilitation have been applied to their full and feasible extent. The mitigation hierarchy, including the consideration of project alternatives, has been applied to the proposed development as follows:

Table 2. Application of the mitigation hierarchy to the proposed development.

Step	Measures applied
Avoid	→ Alternative 1 (84 erven, footprint of approximately 10.16 ha, conservation area of 2.06 ha enclosed by erven) was rejected in favour of Alternative 2. → Alternative 2 removes the 13 erven on the northern slope, reduces the footprint to approximately 8.15 ha and avoids a further 2.0 ha of habitat compared to Alternative 1. → The northern 3.96 ha (Erf 80) is retained as a single no development area / proposed conservation area, that adjoins RE/281, maintaining the connectivity function of the CBA1. → A pre-construction census of *Mimetes saxatilis* is to be undertaken, and the boundary of Erf 80 and the adjacent erven adjusted to retain the densest stands where feasible.
Minimise	→ Demarcation of the construction footprint and treatment of Erf 80 as a construction no-go area. → Search and rescue of geophytes, succulents and other transplantable species, and collection of seed of *M. saxatilis* and other Proteaceae for propagation. → Stripping and re-use of topsoil; landscaping with locally indigenous species only. → Fauna-permeable, appropriate fencing on the developed edge of Erf 80, with the security perimeter enclosing the residential component only. → Controls on lighting, domestic animals, vehicle speed, pesticides and the Argentine ant.
Rehabilitate	→ Alien invasive plant clearing on the whole property before construction, with ongoing control in Erf 80. → Removal of cut alien material and woodcutting debris. → Ecological fire management of Erf 80, coordinated with the adjoining RE/281, with firebreaks on the developed edge only. → Progressive rehabilitation of temporarily disturbed areas.
Offset	The permanent loss of approximately 8.15 ha of Critically Endangered Agulhas Limestone Fynbos and CBA1 habitat, and part of the *M. saxatilis* subpopulation, cannot be addressed on site. An offset is therefore required, as set out in Sections 6 to 10 of this report.

The botanical specialist confirms that on-site mitigation cannot reduce the residual impacts further, because the only scope to address the loss of the Critically Endangered vegetation on Erf 3495 is the protection of equivalent habitat elsewhere. The Struisbaai Conservation Master Plan addresses this at a landscape scale. It is a draft

concept option for the Paapekuilsfontein landholding, to be further refined with input from SANParks and Cape Nature and is submitted as a conceptual proposal during the first round of the Public Participation Process (PPP). The plan identifies and sets aside a Nature Conservation Area within the subject property (~4 ha, Erf 80), which is intended to be formally protected in perpetuity as well as the majority of the remaining natural area on RE/281. This proposed concept area is a high value conservation area to secure not only due to its faunal and botanical richness and diversity, but also its location within the landscape. The proposal has the ability to add over 300 ha of conservation area to join with the Agulhas National Park as well as the adjacent Erf 1032, Struisbaai, which has been recently zoned as Private Nature Reserve. The long term benefits of securing these linkages are significant.

Note that the landowner has flagged possible future development nodes on RE/281, as part of the broader conservation plan.

5.2. Justification for the offset

A biodiversity offset is required for the following reasons:

- → After the full application of the mitigation hierarchy, the residual impacts on Agulhas Limestone Fynbos, the CBA1 and *Mimetes saxatilis* remain of Medium Negative significance. Chapter 6.2 of the guideline requires an offset where residual impacts are of medium or high significance.
- → The impacts are permanent and irreversible. The guideline defines a permanent impact as one that lasts thirty years or more.
- → The impacts affect biodiversity of major potential concern within a CBA1 (Section 7.2), which must be counterbalanced if the development is to be authorised.
- → The cumulative impact on Agulhas Limestone Fynbos at Struisbaai is rated Medium Negative unless the conservation areas proposed in the Struisbaai Conservation Master Plan are secured, in which case it is reduced to Low Negative.

5.3. The No-go Alternative

The No-Go alternative entails the retention of Erf 3495 in its current state. The specialists rate the No-Go alternative as having Low to Medium Negative impacts, associated with ongoing degradation through alien plant invasion, woodcutting and the long absence of fire, as there is no responsible party or legal obligation to manage the property under the status quo. The property lies within the Struisbaai urban edge and is identified for future residential use in the Cape Agulhas Municipality Spatial Development Framework (2022–2027). The No-Go alternative would therefore not secure or manage the property, nor would it secure the larger, connected conservation area on RE/281 that would be achieved through the offset. The overall need and desirability of the development, and the reasons why the No-Go alternative is not recommended, are assessed in the BAR. The offset is not advanced as a reason to authorise the development.

6. IMPACT ANALYSIS AND RESIDUAL IMPACTS

The significance of the impacts of Alternative 2 on biodiversity, before and after on-site mitigation, as rated by the botanical and faunal specialists, is summarised in **Table 3**. In accordance with Chapter 6.2 of the guideline, significance takes into account the intensity, extent and duration of each impact and the likelihood of its occurrence.

Table 3. Specialist impact ratings for Alternative 2 (Preferred layout).

Impact	Before mitigation	After mitigation (residual)
Loss of Agulhas Limestone Fynbos and CBA1 habitat (botanical)	High Negative	Medium Negative
Loss of plant species of conservation concern, including *M. saxatilis* (botanical)	High Negative	Medium Negative
Fragmentation, edge effects and disruption of ecological processes (botanical)	Medium Negative	Low Negative
Spread of alien invasive plants (botanical)	Medium Negative	Low Negative
Permanent loss and transformation of faunal habitat (faunal)	Medium–High Negative	Medium Negative
Habitat fragmentation and faunal landscape connectivity (faunal)	Medium–High Negative	Medium Negative
Construction-related disturbance and mortality (faunal)	Medium–High Negative	Medium Negative
Operational disturbance of retained faunal habitat (faunal)	Medium–High Negative	Medium Negative
Cumulative impact on Agulhas Limestone Fynbos at Struisbaai (botanical)	Medium Negative (without secured conservation areas)	Low Negative (with Master Plan conservation areas secured)

The significant residual negative biodiversity impact to be offset is therefore the permanent loss of approximately 8.15 ha of Critically Endangered Agulhas Limestone Fynbos within a CBA1, including limestone outcrop habitat, part of the subpopulation of *Mimetes saxatilis* (Endangered) and associated limestone endemics, faunal habitat of High Site Ecological Importance, and part of the landscape linkage between the Struisbaai urban edge and Agulhas National Park.

7. OFFSET REQUIREMENT DETERMINATION

7.1. Basic Offset Ratio

Chapter 7.2.1 of the guideline sets out a standard, area-based approach to determining the basic offset ratio, based on the Remaining Ecosystem Extent, the Ecosystem Protection Level and the Ecosystem Threat Status of the affected ecosystem type, as recorded in the look-up table in Annexure A. The higher of the ratio based on Remaining Ecosystem Extent and Ecosystem Protection Level, and the ratio based on Ecosystem Threat Status, is selected as the starting ratio. The application of the standard approach to Agulhas Limestone Fynbos is set out in **Table 4.**

Table 4. Basic offset ratio for Agulhas Limestone Fynbos (Annexure A of the guideline).

Step in the standard approach	Agulhas Limestone Fynbos
Ecosystem Threat Status	Critically Endangered
Remaining Ecosystem Extent	92% (Band 4)
Ecosystem Protection Level	Poorly Protected
(A) Threshold of Potential Concern ratio (applies if extent ≤ 30%)	Not applicable
(B) Ratio based on Remaining Ecosystem Extent and Protection Level	0:1
(C) Ratio based on Ecosystem Threat Status	30:1
(D) Starting ratio (higher of B and C)	30:1

7.2. Adjusted Offset ratio

Chapter 7.2.1(2) of the guideline provides for the basic ratio to be increased by a factor of 1.5, up to a maximum of 30:1, where the impact occurs in a CBA2. This adjustment does not apply, as the affected area is a CBA1 and the starting ratio is already at the maximum of 30:1. The guideline treats CBA1 as potentially irreplaceable biodiversity, and residual impacts on irreplaceable biodiversity cannot be offset. The botanical specialist has considered this for Erf 3495. The residual impacts of Alternative 2 are rated Medium Negative, and the specialist concludes that the loss of Critically Endangered Agulhas Limestone Fynbos in a CBA1 and of Mimetes saxatilis habitat are red flags that "are not regarded as fatal flaws for Alternative 2", provided that the conditions in Section 7.5 are met. The guideline also notes that not all CBA1 areas in the Western Cape Biodiversity Spatial Plan are necessarily irreplaceable, and that the reasons for the classification should be obtained from CapeNature. This confirmation will be requested from CapeNature during the current public participation process.

7.3. Unique or specialist biodiversity feature

Chapter 7.3 of the guideline requires that biodiversity features other than ecosystem extent, protection level, threat status and priority status be considered, and the offset requirements adjusted if necessary. These features, and their implications for the offset, are set out in **Table 5** below.

Table 5. Unique or special biodiversity features (Chapter 7.3 of the guideline).

Feature	Situation on Erf 3495	Requirements for the offset
(a) Condition of the affected habitat	Largely intact and in fair to good condition; disturbance confined to tracks, servitudes and alien-invaded patches.	The offset site must be in comparable or better condition. No reduction of the ratio for degraded habitat is warranted.
(b) Threatened or restricted-range species	Mimetes saxatilis (Endangered) at its eastern distribution limit, and Vulnerable and Near Threatened limestone endemics.	The offset site must support viable populations of M. saxatilis and the associated limestone endemics, confirmed by field verification.
(c) Special habitats	Limestone (calcrete) pavements and outcrops that support limestone endemics.	The offset site must include equivalent limestone pavement and outcrop habitat.
(d) Role in ecological processes	Part of the landscape linkage between the Struisbaai urban edge and Agulhas	The offset site must provide an effective, connected link to Agulhas National Park and adjoin

	National Park; fire, pollination and ant-mediated seed dispersal.	Erf 80, and be large enough to allow ecological burning.
(e) Ecological infrastructure	No ecological infrastructure on which communities depend for ecosystem services was identified.	No additional requirement.

7.4. Required offset ratio

Applying the starting ratio of 30:1, with no adjustment, the required size of the offset is as follows:

Table 6: Required size of the biodiversity offset.

Development component	Offset ratio	Area lost (ha)	Offset required (ha)
Agulhas Limestone Fynbos (Critically Endangered) – residential erven, private streets and private open space	30:1	± 8.15	± 244.5
TOTAL		**± 8.15**	**± 244.5**

The proposed mechanism to meet this requirement is the Struisbaai Conservation Master Plan. The Master Plan is a landscape-scale conservation framework including the remaining Open Space on Erf 3495 and the Remainder of Farm Paapekuilsfontein No. 281 (RE/281), both of which are owned by the applicant. The conservation areas comprise approximately 327 ha on RE/281. Erf 80 (3.96 ha) on Erf 3495 is retained as an avoidance measure and is managed as part of the same conservation unit, but is not counted towards the offset area. The proposed conservation area directly abuts the Agulhas National Park and the Private Open Space on Erf 1032. The opportunity to add large scale conservation areas to existing nature reserves is significant.

The positions of the specialists on the Master Plan are as follows:

→ Botanical specialist (McDonald, October 2026). The specialist states that, from a botanical perspective, the Master Plan has the attributes of a landscape-scale offset. Its conservation areas:

- are in the order of forty times the development footprint of Alternative 2;
- adjoin Erf 3495 and the Erf 80 Nature Conservation Area;
- comprise the same vegetation type, Agulhas Limestone Fynbos, on the same limestone substrate; and
- would secure the connection between the urban edge of Struisbaai and Agulhas National Park, which is the principal function of the CBA1 in this area.

The specialist supports the Master Plan as the appropriate mechanism to address the residual impacts of Alternative 2, provided the conditions set out in Section 7.5 are met. On that basis, the specialist concludes that the cumulative impact on Agulhas Limestone Fynbos would be reduced from Medium Negative to Low Negative once the conservation areas are formally secured and managed.

→ Faunal specialists (Venter & Swart, November 2026). The specialists treat the broader Paapekuilsfontein conservation framework as additional landscape-scale mitigation for habitat loss, fragmentation and reduced faunal connectivity, which cannot be adequately managed within Erf 3495

alone. It does not change their Site Ecological Importance classifications or impact ratings. They leave the determination of whether any additional conservation mechanism is required to the competent authority, informed by the relevant conservation authorities.

The extent of the proposed conservation areas, compared with the offset requirement for Erf 3495, is shown in **Table 7.**

Table 7: Summary of the proposed offset.

Parameter	Area (ha)
Development footprint of Alternative 2	± 8.15
Offset required at 30:1	± 244.5
Total Master Plan conservation areas	± 327

The proposed conservation areas (approximately 327 ha) therefore exceed the offset of approximately 244.5 ha indicated for Erf 3495. The relationship of the conservation areas to the future developments proposed on RE/281 is addressed in Section 9.4.

Additional requirements for the offset area are:

- → be in comparable or better ecological condition than the affected habitat;
- → include limestone pavement and outcrop habitat;
- → support *Mimetes saxatilis* and the associated limestone endemics; and
- → be connected to Erf 80 and the protected areas of Agulhas National Park.

The offset area is to be provided within the conservation areas of the Struisbaai Conservation Master Plan, as supported by the botanical specialist, subject to the conditions in Section 7.5. The final conservation areas must be surveyed and secured in perpetuity at the highest level of Stewardship.

7.5. Conditions set by the botanical specialist

The botanical specialist (McDonald, October 2026) supports the Master Plan as the mechanism to address the residual impacts of Alternative 2, subject to the following five conditions. If the conservation areas on RE/281 are not secured, the specialist states that a separate biodiversity offset for Erf 3495 would be required.

- → **Condition 1. Legal security:** the conservation areas must be legally secured in perpetuity, for example by declaration as a nature reserve or protected environment, a biodiversity stewardship agreement with CapeNature, or incorporation into Agulhas National Park, with a title deed restriction.
- → **Condition 2. Management:** a management plan with a responsible management authority and secured funding (alien clearing, fire management and access control) must be in place.
- → **Condition 3. Mapping and verification:** the conservation areas, ecological corridors and feeder areas must be shown explicitly on the final Master Plan, with their extent, and the vegetation and species of conservation concern must be verified in the field in the appropriate season.
- → **Condition 4. Timing:** the securing of the conservation areas must be tied to the authorisation of Erf 3495, so that it is in place before, or at the same time as, the loss of habitat on Erf 3495.

→ **Condition 5. Combined adequacy:** as the same conservation areas will be presented as mitigation for the other Master Plan developments, their adequacy must be demonstrated against the combined residual impacts of all of these developments, and not Erf 3495 alone. This is addressed in Section 9.4.

8. REQUIRED BIODIVERSITY OUTCOMES

The guideline requires that the biodiversity outcomes to be achieved in the offset area, be specified, so that the offset is measurable, auditable and enforceable. The following outcomes are proposed. The measurable targets and indicators must be finalised in the Biodiversity Offset Management Plan (BOMP), in consultation with CapeNature and SANParks.

Table 8: Required biodiversity outcomes on the offset site

Outcome	**Indicator**	**Proposed target (to be confirmed in the BOMP)**
Offset site secured in perpetuity	Declaration as a Nature Reserve and endorsement on the title deed	Declaration within the period agreed with CapeNature / SANParks
Extent of Agulhas Limestone Fynbos secured	Surveyed area of the offset site	Approximately 327 ha
Ecological condition maintained or improved	Vegetation condition class; cover of invasive alien plants	No net decline in condition; invasive alien cover reduced to maintenance levels within 5 years
Populations of *M. saxatilis* and limestone endemics maintained	Number and distribution of *M. saxatilis* plants, and recruitment after fire	Baseline established in the first year; no decline over the liability period
Fire-driven ecological processes restored.	Veld age; implementation of the fire management plan	Ecological burns undertaken in accordance with the fire management plan.
Landscape connectivity maintained	Connection between Erf 80, the offset site and Agulhas National Park; functionality of faunal passages	No new barriers; all faunal passages functional
Management effectiveness	Independent audits and annual reports	Annual reports submitted; audits at the intervals required by NEM:PAA and the EA.

9. CANDIDATE OFFSET SITES AND SELECTION OF THE OFFSET SITE

9.1. Site selection principles

Chapter 7.4 of the guideline requires the Biodiversity Offset Report to include a portfolio of candidate offset sites, even where the offset site has already been selected, and to explain why the selected site was chosen over the others. Offset sites should be like-for-like; located in biodiversity priority areas such as CBAs and National Protected Area Expansion Strategy focus areas; secure the best examples of the affected features; improve connectivity between protected and priority areas; preferably adjoin existing protected areas; and be in a natural or near-natural condition.

9.2. Portfolio of candidate offset sites

The scenario presents a unique opportunity, as a large area of strategically located land is owned by the applicant and proposed as the offset area. The conservation areas are proposed as a property-wide commitment for Erf 3495 and for the future developments flagged on RE/281 (Section 9.4). A single offset area is therefore proposed, within the landscape-scale Paapekuilsfontein Conservation Master Plan. Sites outside the Paapekuilsfontein landholding were not pursued, as the conservation areas on RE/281 combine like-for-like Agulhas Limestone Fynbos on the same limestone substrate, contiguity with Erf 3495 and Erf 80, and the CBA1 corridor towards Agulhas National Park, on land under the control of the applicant.

Table 9. Candidate offset sites on the Remainder of the Farm 281.

Candidate site	Description	Availability and feasibility	Evaluation
Conservation area within RE/281 (approximately 327 ha)	Agulhas Limestone Fynbos on the same limestone substrate, within the same CBA1, adjoining Erf 3495 and Erf 80 and extending towards Agulhas National Park and Erf 1032 Private Nature Reserve.	Located on RE/281, the landholding to which the Struisbaai Conservation Master Plan applies	Meets the offset requirements, significant location in landscape allows for long-term enlargement and connectivity of key protected areas in the landscape.
Remainder of 3495 ~4ha) (Re/3495)	Agulhas Limestone Fynbos on the same limestone substrate, Faunal Importance, same CBA1, extending towards Agulhas National Park and the Erf 1032 Private Nature Reserve.	Part of proposed development of Erf 3495	Meets the offset requirements, significant location in landscape allows for long terms enlargement and connectivity of key protected areas in the landscape.

9.3. Selected offset site and reasons for selection

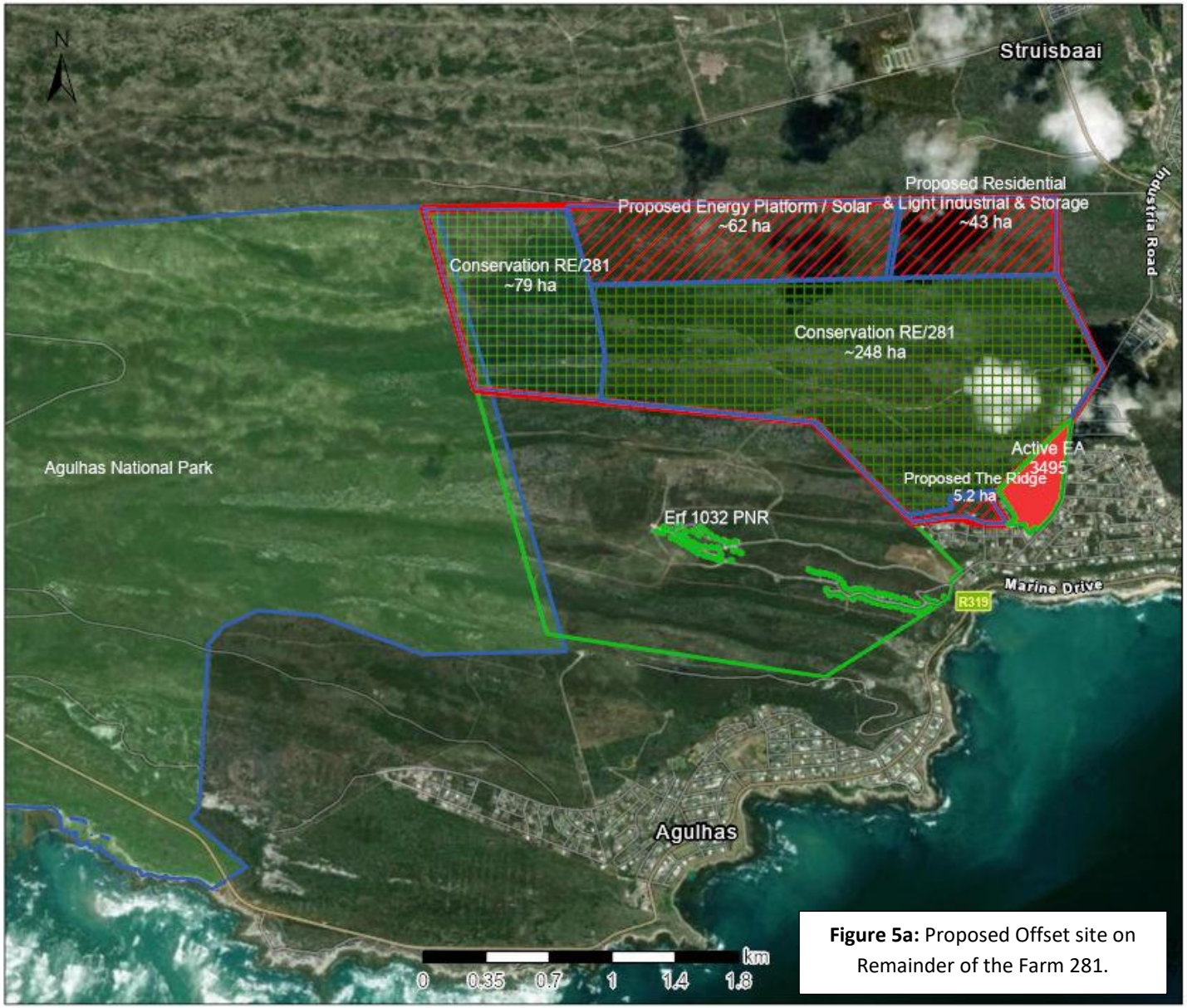
The conservation areas of approximately 327 ha on RE/281 are proposed as the offset site, with Erf 80 managed as part of the same conservation unit. The candidate offset site is therefore available and within the control of the applicant, which substantially improves the feasibility of securing it. The developer, as landowner, is able to request the declaration of the offset site as a Nature Reserve, to register interim security over it, and to commit the land to the offset in perpetuity without the need to acquire the land or to negotiate with a third party. In terms of Chapter 7.4.2 of the guideline, the securing mechanisms are most effective where the EA holder is also the owner of the offset site.

The reasons for its selection are as follows:

- → It is like-for-like, comprising Agulhas Limestone Fynbos on the same limestone substrate as the affected area, and is expected to support the same limestone endemics.
- → It lies within the same CBA1 and National Protected Area Expansion Strategy focus area, and within the buffer of Agulhas National Park.

- → It adjoins Erf 80 and extends towards Agulhas National Park and would therefore secure the landscape linkage that is the principal function of the CBA1, consistent with the guideline's preference for integrated, landscape-scale offsets.
- → It is of sufficient extent to meet the offset requirement on its own.
- → It forms part of a single landholding for which a landscape-scale conservation framework has already been prepared, which improves the feasibility of securing and managing the site.
- → The land is not currently protected, so its declaration as a Nature Reserve would be additional to existing conservation obligations.

PAAPEKUILSFONTEIN CONSERVATION PLAN



Legend

Map Center: Lon: 20°0'23.6"E
Lat: 34°48'34"S

Scale: 1:36,112

Date created: 2026/16/11

Western Cape Government
FOR YOU

Figure 5a: Proposed Offset site on Remainder of the Farm 281.

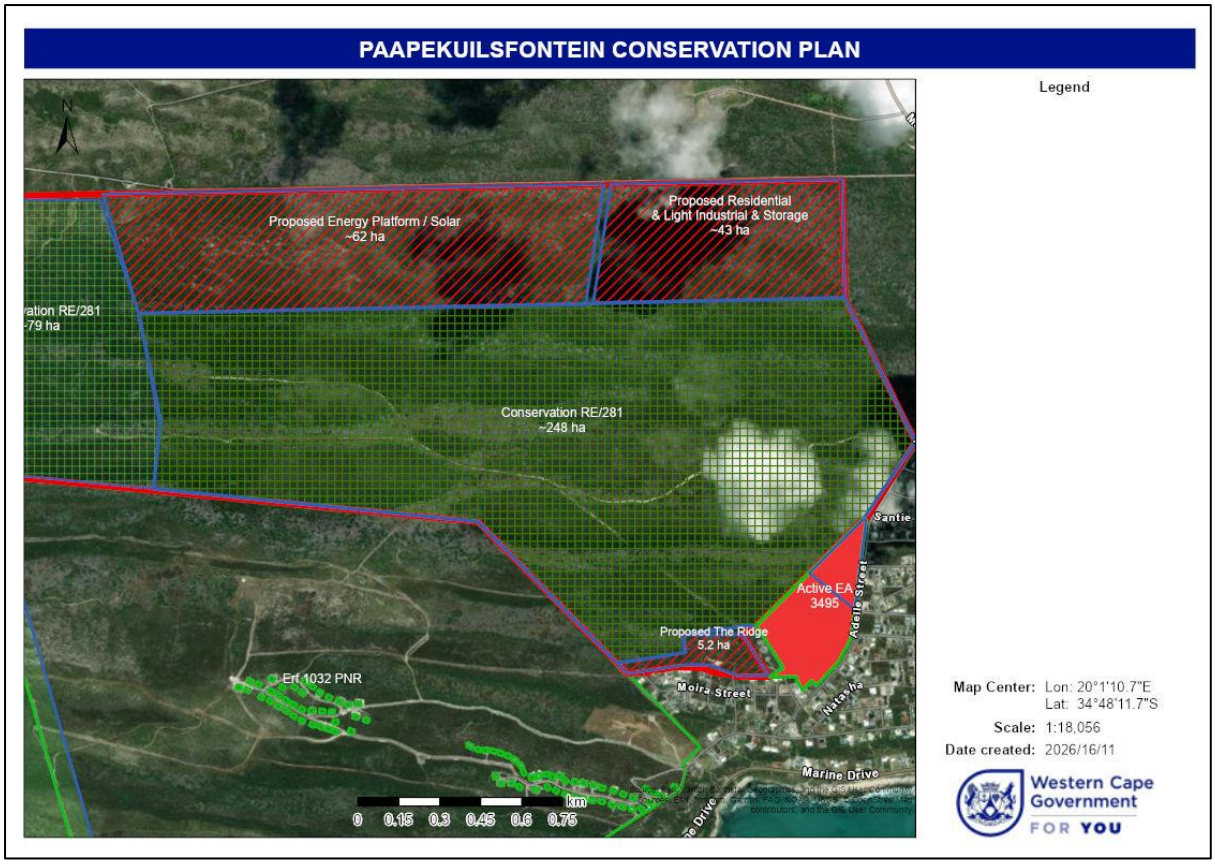


Figure 5b: Proposed Offset site on Remainder of the Farm 281.

9.4. Allocation of the Master Plan conservation areas

The Master Plan conservation areas (approximately 327 ha on RE/281) are proposed as a single, property-wide conservation commitment for Erf 3495 and for the future developments proposed on RE/281. Erf 3495 is the first development to be assessed against this commitment, and its indicative offset requirement of approximately 244.5 ha falls within the conservation areas. The botanical specialist requires the adequacy of the conservation areas to be demonstrated against the combined residual impacts of all Master Plan developments. The offset requirements of the future developments cannot be determined at this stage, as their final footprints, vegetation and condition have not been assessed. Each will be subject to its own environmental authorisation process, in which its residual impacts and offset requirement will be assessed against the secured conservation areas. The competent authority, informed by CapeNature and SANParks, will then decide whether further measures are required. The value of the conservation areas lies principally in their location. They are contiguous with Erf 3495 and Erf 80, and extend westwards to adjoin Agulhas National Park and the Private Nature Reserve on Erf 1032. In doing so, they secure the CBA1 corridor between the Struisbaai urban edge and the protected area network, which the botanical specialist identifies as the principal function of the CBA1 in this area. The guideline provides for offset ratios to be adjusted with reference to the CBA map, and favours offset sites that promote connectivity at a landscape scale. The Master Plan fixes the conservation boundaries before any further development is planned. Future proposals on RE/281 must therefore be designed around the conservation network, so that its ecological connections are not progressively narrowed through successive applications, as recommended by the faunal specialists. To prevent the same land being counted more than once, the conservation areas, the portion relied on for Erf 3495, and any portion later relied on for another development

must be recorded in the Biodiversity Offset Implementation Agreement, the Nature Reserve management plan and the National Biodiversity Offset Register.

Table 10. Master Plan developments and offset status.

Development	Footprint (ha)	Ratio	Indicative offset (ha)
Erf 3495	± 8.15	30:1	± 244.5
The Ridge	± 5.2	Not determined	Pending
Energy platform / solar facility	± 62	Not determined	Pending
Residential, light industrial and storage area	± 43	Not determined	Pending
TOTAL	**± 118.4**		**Pending**

10. SECURING OF THE OFFSET SITE: CAPENATURE STEWARDSHIP PROGRAMME – LEVEL 3 NATURE RESERVE

10.1. The CapeNature Biodiversity Stewardship Programme

Chapter 7.4.2 of the guideline requires offset sites to be secured for biodiversity conservation, ideally in perpetuity, and identifies the declaration of a protected area in terms of NEM:PAA as the preferred mechanism, particularly for areas adjacent to existing protected areas. Biodiversity stewardship is the approach through which conservation authorities enter into voluntary agreements with landowners to secure and manage land of high biodiversity value. Proposals are assessed by CapeNature against the biodiversity value of the land and its contribution to provincial conservation targets, and are considered by the CapeNature Stewardship Review Committee.

Table 11. Indicative levels of the CapeNature Biodiversity Stewardship Programme.

Level	Mechanism	Legal status and security	Suitability as an offset for Erf 3495
Level 3	Nature Reserve	Declared by the MEC under NEM:PAA with the agreement of the landowner. A formal protected area, endorsed on the title deed, with an approved management plan and a contract with CapeNature. Highest level of security.	Suitable. Provides security in perpetuity for a permanent impact on a Critically Endangered ecosystem. Preferred mechanism.
Level 2	Biodiversity Agreement	Contractual agreement between the landowner and CapeNature for a fixed term, with a management plan. Not a declared protected area.	Not sufficient on its own, as the term is finite while the impact is permanent.
Level 1	Conservation Area / partnership	Voluntary, non-binding commitment by the landowner. No legal protection.	Not suitable as an offset.

The terminology and terms of the stewardship levels must be confirmed with CapeNature at the start of the stewardship process.

10.2. Motivation for a Level 3 Nature Reserve

Declaration of the offset site as a Nature Reserve is the preferred mechanism for the Struisbaai Conservation Master Plan, for the following reasons:

- → The impact on Erf 3495 is permanent and irreversible. The National Biodiversity Offset Guideline requires that the offset be secured for at least the duration of the impact, which in this case means in perpetuity. Only a declared protected area, endorsed on the title deed, provides this level of security.
- → The land is of the highest biodiversity value. It supports Critically Endangered Agulhas Limestone Fynbos in a CBA1, an Endangered plant species and habitat of High Site Ecological Importance for several faunal species of conservation concern and lies within a National Protected Area Expansion Strategy focus area. It is therefore likely to meet the criteria for the highest level of stewardship.
- → The land adjoins the Agulhas National Park, as well as the Private Nature Reserve on Erf 1032 and the proposed additional area will provide a significant benefit of increasing the protected areas and allowing for large scale ecological connectivity.
- → Declaration under NEM:PAA brings with it a statutory management plan, a designated management authority and oversight by CapeNature, which together address the second condition set by the botanical specialist (Section 7.5).

10.3. Steps to declare the offset site as a Nature Reserve

The process to declare the offset site as a Nature Reserve through the CapeNature Biodiversity Stewardship Programme is summarised in Table 12. The sequence and timing should be confirmed with CapeNature.

Table 12. Steps to secure the offset site as a Level 3 Nature Reserve.

Step	Action	Responsible party	Timing
1	Formal expression of interest to the CapeNature Biodiversity Stewardship Programme by the owner of RE/281 and the applicant, with the Master Plan and specialist reports.	Applicant, landowner, EAP	During PPP1 (now)
2	Field verification of the offset site: vegetation and condition mapping, and surveys of *Mimetes saxatilis* and other species of conservation concern in the appropriate season (spring).	Botanical specialist	Spring 2027, before the final BAR
3	Site assessment by CapeNature and consideration by the CapeNature Stewardship Review Committee; confirmation that the site qualifies as a Nature Reserve.	CapeNature / SANParks	Before the final BAR
4	Finalisation of the Master Plan with surveyed boundaries of the conservation areas, corridors and preparation of a Surveyor-General diagram.	Applicant, land surveyor, EAP	Before the Final BAR

Step	Action	Responsible party	Timing
5	Agreement on the offset ratio and requirement with CapeNature, recorded in writing, and conclusion of a written offset agreement between the applicant, the landowner and CapeNature.	Applicant, landowner, CapeNature / SANParks	Before the final BAR / decision
6	Interim security: registration of a title deed restriction or notarial conservation servitude over the offset site in favour of CapeNature, pending declaration.	Landowner, conveyancer	Before commencement of construction
7	Conclusion of the stewardship (Nature Reserve) contract with CapeNature and preparation of the draft management plan.	Landowner, CapeNature / SANParks	Before commencement of construction
8	Public consultation on the intention to declare, as required by NEM:PAA.	CapeNature / SANParks	After step 7
9	Declaration of the Nature Reserve by the MEC by notice in the Provincial Gazette, and endorsement of the declaration on the title deed.	MEC, CapeNature, SANParks, Registrar of Deeds	Within 24 months of authorisation as far as possible
10	Assignment of the management authority and approval of the management plan in terms of NEM:PAA.	MEC, CapeNature, SANParks, Management Authority	Within 12 months of declaration
11	Implementation of the management plan, monitoring and annual reporting to CapeNature and DEA&DP.	Management authority	Ongoing, in perpetuity

10.4. Interim security and timing

The fourth condition set by the botanical specialist (Section 7.5) requires the offset to be secured before, or at the same time as, the loss of habitat on Erf 3495. The declaration of a Nature Reserve can take a considerable time. It is therefore recommended that the Environmental Authorisation, if granted, require that no vegetation clearing may commence on Erf 3495 until the written offset agreement between the applicant, the landowner of RE/281 and CapeNature has been signed, and interim security (a title deed restriction or notarial conservation servitude in favour of CapeNature) has been registered over the conservation areas.

10.5. Management authority and management plan

The landowner of the offset site, or an entity nominated by the landowner (such as a conservation trust, a non-profit company or the Homeowners' Association of the development), will be assigned as the management authority of the Nature Reserve, with CapeNature / SANParks providing oversight and technical support. The management plan, prepared in terms of NEM:PAA and in consultation with CapeNature / SANParks, should address at least the following:

- → the objectives of the Nature Reserve, including the persistence of Agulhas Limestone Fynbos, *Mimetes saxatilis* and the associated limestone endemics, and the maintenance of connectivity with Agulhas National Park;
- → an alien invasive plant clearing programme with initial clearing, systematic follow-up and removal of cut material;
- → an ecological fire management plan, prepared with the local fire protection association and CapeNature, which allows prescribed burning of the reserve together with Erf 80;
- → access control, fencing and fauna permeability, and controls on dumping, woodcutting and informal use;
- → the incorporation and management of Erf 80 as part of the same conservation unit;
- → monitoring of vegetation condition, alien plant cover, fire, species of conservation concern and fauna, with defined indicators; and
- → an annual plan of operation, a budget and reporting requirements.

10.6. Funding

The offset must be supported by secured, long-term funding for management. It is recommended that a dedicated conservation fund be established, funded through a capital contribution by the developer and a conservation levy on each residential erf, collected by the Homeowners' Association and ring-fenced for the management of the Nature Reserve and Erf 80. The estimated annual management cost, and the mechanism to secure funding in perpetuity, must be set out in the management plan and agreed with CapeNature / SANParks.

10.7. Incentives available to the landowner

Land declared as a Nature Reserve may qualify for fiscal and other incentives, including a property rates exclusion for protected areas in terms of the Local Government: Municipal Property Rates Act, 2004, and tax incentives for declared protected areas in terms of the Income Tax Act, 1962. CapeNature also provides technical support for management planning, alien clearing and fire management. The applicability of these incentives must be confirmed with CapeNature, the Cape Agulhas Municipality and a tax adviser.

10.8. Alternative mechanisms

Should declaration as a Nature Reserve not be achievable, the following alternative mechanisms, in order of preference, may be considered in consultation with CapeNature and SANParks:

- → declaration as a Protected Environment in terms of NEM:PAA, together with a title deed restriction securing the land in perpetuity;
- → incorporation of the offset site into Agulhas National Park, by agreement with SANParks; or
- → registration of a notarial conservation servitude in perpetuity in favour of CapeNature / SANParks, supported by a management plan and secured funding.

11. RECOMMENDED CONDITIONS OF AUTHORISATION

It is recommended that the following conditions relating to the offset be included in the environmental authorisation, if granted:

1. The applicant must secure an offset agreed with CapeNature / SANParks (currently approximately 327 ha) of Agulhas Limestone Fynbos on RE/281, as shown on the Struisbaai Conservation Master Plan, through declaration as a Nature Reserve in terms of NEM:PAA.
2. No vegetation clearing may commence on Erf 3495 until (a) the written offset agreement between the applicant, the landowner of RE/281 and CapeNature has been signed, and (b) a title deed restriction or

notarial conservation servitude has been registered over the conservation areas in favour of CapeNature. Proof must be submitted to DEA&DP.

3. Declaration of the Nature Reserve must be completed within the period agreed with CapeNature / SANParks, and proof of declaration and title deed endorsement must be submitted to DEA&DP.
4. Erf 80 must be zoned for nature conservation, protected by a title deed restriction, and incorporated into the management of the Nature Reserve.
5. A management plan for the Nature Reserve and Erf 80, with an assigned management authority and secured funding, must be prepared in consultation with CapeNature / SANParks and approved before the transfer of the first residential erf.
6. The management authority must submit an annual offset implementation and monitoring report to Cape Nature and DEA&DP.

12. SUMMARY OF ACTIONS REQUIRED

Table 13 summarises the actions required to give effect to the offset, and the stage of the process at which each must be completed.

Table 13. Offset implementation roadmap.

Stage	Action required	Responsible
Now (PPP1)	Initiate engagement with CapeNature (Biodiversity Stewardship Programme and Landscape Conservation) and SANParks. Confirm the ownership of RE/281 and obtain the landowner's written commitment to the offset and Nature Reserve. Circulate this report with the BAR for comment.	Applicant, EAP
Before the final BAR	Spring field verification of the offset site (vegetation, condition, *M. saxatilis* and SCC). Finalise and survey the Master Plan conservation areas, and record the portion relied on for Erf 3495. Obtain the CapeNature Stewardship Review Committee outcome. Agree the offset ratio and extent with CapeNature / SANParks in writing. Update this report and the BAR.	Applicant, specialists, EAP,
Before decision	Conclude the written offset agreement between the applicant, landowner and CapeNature / SANParks. Confirm the funding arrangement and management authority.	Applicant, landowner, CapeNature / SANParks
Before construction	Register interim security (title deed restriction or notarial servitude). Sign the stewardship (Nature Reserve) contract. Submit proof to DEA&DP.	Landowner, conveyancer, CapeNature/ SANParks

Stage	Action required	Responsible
After authorisation	Public consultation and gazetting of the Nature Reserve; title deed endorsement. Approve the management plan and assign the management authority. Implement management, monitoring and annual reporting.	CapeNature / SANParks, MEC, management authority

13. CONCLUSION

This Biodiversity Offset Report has been prepared to support the Basic Assessment for the proposed residential development on Erf 3495, Struisbaai, and sets out the Struisbaai Conservation Master Plan commitment within which future development proposed on RE/281 will be assessed. The following key points are confirmed:

1. **Residual impact:** After the full application of the mitigation hierarchy, including the selection of Alternative 2 and the retention of Erf 80, the development will result in the permanent loss of approximately 8.15 ha of Critically Endangered Agulhas Limestone Fynbos and CBA1 habitat, and part of the subpopulation of the Endangered *Mimetes saxatilis*. The residual impact is of Medium Negative significance, and a biodiversity offset is required.
2. **Offset requirement:** Applying the default ratio of 30:1 for Critically Endangered ecosystems in the National Biodiversity Offset Guideline (2023), the offset requirement is approximately 244.5 ha of Agulhas Limestone Fynbos in equal or better condition. A reduction for degraded habitat is not considered applicable, as the affected habitat is largely intact. The final ratio and offset requirement will be determined by the competent authority, informed by CapeNature and SANParks.
3. **Offset site:** The Struisbaai Conservation Master Plan proposes approximately 327 ha of contiguous Agulhas Limestone Fynbos on RE/281, which meets the principles of like-for-like, additionality, proximity and connectivity, and would satisfy the Erf 3495 requirement. Erf 80 is managed as part of the same conservation unit. The conservation areas are proposed as a property-wide commitment for Erf 3495 and for the future developments flagged on RE/281, each of which will be assessed against the secured conservation areas in its own environmental authorisation process. The condition and species of conservation concern of the conservation areas must be verified in the field.
4. **Offset mechanism:** The preferred mechanism is declaration of the offset site, together with Erf 80, as a Nature Reserve in terms of NEM:PAA under the CapeNature Biodiversity Stewardship Programme (Level 3), which provides security in perpetuity, a statutory management plan and a designated management authority. The written offset agreement must be signed and interim security registered before any vegetation clearing on Erf 3495.
5. **Next steps:** Engagement with CapeNature and SANParks must be initiated during the current public participation phase, and the field verification, survey, Stewardship Review Committee approval and offset agreement must be completed before the final BAR is submitted to the competent authority.

This report will be updated following consultation with CapeNature and SANParks as well as other interested parties.