LORNAY
ENVIRONMENTAL CONSULTING

PRE-APPLICATION
BASIC ASSESSMENT REPORT

PROPOSED RESIDENTIAL DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON ERF 3495, STRUISBAAI, BREDASDORP

20 NOVEMBER 2026

Consultant:

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Lornay Environmental Consulting Pty Ltd| Reg 2015/445417/07

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 RESIDENTIAL DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON ERF 3495, STRUISBAAI, BREDASDORP RD

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 List	
Appendix A | Locality	
Appendix A	Locality Map
Appendix B | Alternatives	
Appendix B1	Alternative Layout 1
Appendix B2	Alternative Layout 2 (Preferred)
Appendix C | Photo report	
Appendix C	Photo Report
Appendix D | BGIS	
Appendix D	BGIS Map
Appendix E | HWC	
Appendix E1	Heritage Western Cape Response to NID
Appendix F | Public Participation Process	
Appendix F	Notice of Public Participation Process
Appendix G | Specialist	
Appendix G1	Agricultural Compliance Statement
Appendix G2	Botanical and Terrestrial Biodiversity Impact Assessment
Appendix G3	Terrestrial Animal Site Sensitivity Verification and Species Assessment
Appendix G4	Heritage Impact Assessment
Appendix G5	Palaeontological Impact Assessment
Appendix G6	Visual Impact Assessment
Appendix G7	Transport Impact Assessment
Appendix G8	Electrical Engineering Report
Appendix G9	Civil Engineering Report
Appendix G10	Architectural Guidelines
Appendix G11	Landscape Plan
Appendix H | EMP	
Appendix H	Environmental Management Plan
Appendix I | Screening	
Appendix I1	Screening Tool Report
Appendix I2	Site Sensitivity Verification Report
Appendix J | Services Confirmation Report	
Appendix J1	Services Confirmation Report
Appendix K | Paapekuilsfontein Conservation Master Plan	

Appendix K	Paapekuilsfontein Conservation Master Plan
Appendix L | Biodiversity Offset Report	
Appendix L	Biodiversity Offset Report

SECTION A: ADMINISTRATIVE DETAILS

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

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

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	Cape Agulhas Municipality	
Contact person:	Environmental Manager	
Postal address:	1 Dirkie Uys Street	
	PO Box 517280	Postal code:
Telephone	028 425 5500	Cell:
E-mail:	info@capeagulhas.gov.za	Fax: ( )

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

1.	Is the proposed development (please tick):	New	x	Expansion	
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				
The property has never been developed for urban, agricultural or industrial purposes and contains no existing buildings or built infrastructure. The Botanical and Terrestrial Biodiversity Impact Assessment confirms that the entire erf supports Agulhas Limestone Fynbos, a vegetation type listed as Critically Endangered. The underlying vegetation type is described as mid-high to tall proteoid–asteraceous fynbos which is in fair to good condition, and it is mature and, in some places is considered senescent.					
~~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)~~	~~°~~	~~'~~	~~"~~	
	~~Longitude (E)~~	~~°~~	~~'~~	~~"~~	
	~~Middle-point co-ordinates for all alternatives~~				
	~~Latitude (S)~~	~~°~~	~~'~~	~~"~~	
	~~Longitude (E)~~	~~°~~	~~'~~	~~"~~	
	~~End point co-ordinates for all alternatives~~				
	~~Latitude (S)~~	~~°~~	~~'~~	~~"~~	
	~~Longitude (E)~~	~~°~~	~~'~~	~~"~~	
~~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):	12.22 ha (122 244 m²)			
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):	0 m²			

4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:	

Land Use/Zoning	Erf Number(s)	Area (m^2)	Area (ha)
Single Residential	1 – 71 & 79	63869.3 m^2	6.38 ha
Private Streets / Internal Roads	72	11 666.5 m^2	1.16 ha
Private Open Space (POS)	73 - 78	6160.4 m^2	0.62 ha
Nature Conservation Area (no development area, excluded from the development footprint)	80	39 600.3 m^2	3.96 ha
Development footprint, Alternative 2 (Erven 1 -71 and 79): 81 529.7 m^2 (8.15 ha). Development footprint, **Alternative 1: approximately 10.16 ha. Total property area including Erf 80:**		Alternative 2 (pref): 81529.7 m^2	Alternative 2 (pref) 8.15 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).

The applicant, Helemika Number 1 (Pty) Ltd, has appointed Lornay Environmental Consulting (Pty) Ltd as the independent Environmental Assessment Practitioner (EAP) to undertake the Environmental Authorisation process in terms of the National Environmental Management Act (NEMA, Act No. 107 of 1998) and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended).

This application relates to the proposed establishment of the Bella Vista Residential Development on Erf 3495, Struisbaai, located within the Cape Agulhas Local Municipality. The total extent of the subject property as reflected in the title deed is 122 244 m^2 (12.22 ha). The property is bounded by Adelle Street to the east, existing residential developments to the south and east, and undeveloped land (Farm 281) to the north and west. Although situated within the urban edge as demarcated in the Cape Agulhas Spatial Development Framework (SDF), the property is currently zoned Agricultural Zone 1 in terms of the Cape Agulhas Integrated Zoning Scheme (2022).

To accommodate the proposed development, a land use application is being made in terms of the Cape Agulhas Municipal Land Use Planning By-law (2022) for:

- → **Rezoning (Section 15(2)(a)):** Rezoning Erf 3495 from Agricultural Zone 1 to Sub-Divisional Zone.
- → **Subdivision (Section 15(2)(d))**: Subdivision of the Sub-Divisional Zone into the following erven:

Table 1: Components of the proposed development.

Land Use/Zoning	Erf Number(s)	Area (m^2)	Area (ha)
Single Residential	1 – 71 & 79	63869.3 m^2	6.38 ha
Private Streets / Internal Roads	72	11 666.5 m^2	1.16 ha
Private Open Space (POS)	73 - 78	6160.4 m^2	0.62 ha
Nature Conservation Area (POS): Private Open Space	80	39 600.3 m^2	3.96 ha
Total:		121 130 m^2	12.11 ha

The development proposal incorporates the following components:

Residential erven

→ The development will consist of 72 single residential erven ranging in size from 617.3 m^2 to 1663.3 m^2, covering a combined area of approximately **63869.3 m^2.**
→ Each erf will accommodate a single residential dwelling with associated outbuildings (e.g., covered verandahs, double garages, and service courtyards).
→ The proposed housing units will consist of both single-storey and double-storey typologies. To ensure cohesive design and integration with the surrounding coastal environment, all individual house designs are governed by the estate's **Architectural Guidelines (refer to Appendix G10).**

Internal Access/ Private Roads

→ Vehicular access to the proposed development will be provided via one access: a primary access off Adelle Street.
→ The internal private road network spans a total footprint of 11 666,5 m^2 within 13 m wide road reserves
  - Erf 72: (11 666.5 m^2).

Open space

→ A total of six (6) private open space erven (Erven 73–78) is proposed, covering a combined area of approximately **6160 m^2** will serve as planted green corridors, pedestrian walkways, and storm runoff attenuation corridors.

Nature Conservation Area

→ Erf 80 (approximately 39 600.3 m^2) has been designated as a Nature Conservation Area.
→ Erf 80 will remain in its natural state, managed under fynbos conservation guidelines with no private boundary walls, path extensions, or structures encroaching into this zone.

<u>Associated infrastructure</u>

Water

Potable water will be supplied by the Cape Agulhas Municipality via connection to the existing municipal water network. The proposed development will connect to the existing 160mm diameter uPVC municipal watermain located along the western road reserve edge of Adelle Street, equipped with a bulk municipal water meter.

Two 10m wide municipal water pipeline servitudes traverse the site (crossing Private Open Spaces Erven 73–77 and Erf 80), carrying existing bulk supply mains to municipal reservoirs. No direct connections to these reservoir mains are permitted, and no deep-rooted vegetation or permanent buildings may encroach onto these servitudes.

To ensure water conservation, every house is required to install a minimum 5,000-litre rainwater harvesting tank connected to roof gutters, used for flushing toilets and garden irrigation. Tanks must be buried underground or screened behind masonry walls.

Sewer

The entire development will be served by a 100% waterborne gravity sewer reticulation network. Due to favourable natural slope and terrain fall, no on-site sewage pump stations, septic tanks, or effluent treatment plants are required.

Electricity

The current load requirement for the new residential development is 227kVA. This supply is currently available and can be provided on the existing network after the required upgrades have been undertaken. Electricity will be supplied by the Cape Agulhas Municipality, and each erf will be fitted with an individual municipal prepaid meter.

Solid Waste

Municipal domestic refuse generated by the development will be managed, collected, and disposed of by the Cape Agulhas Municipality.

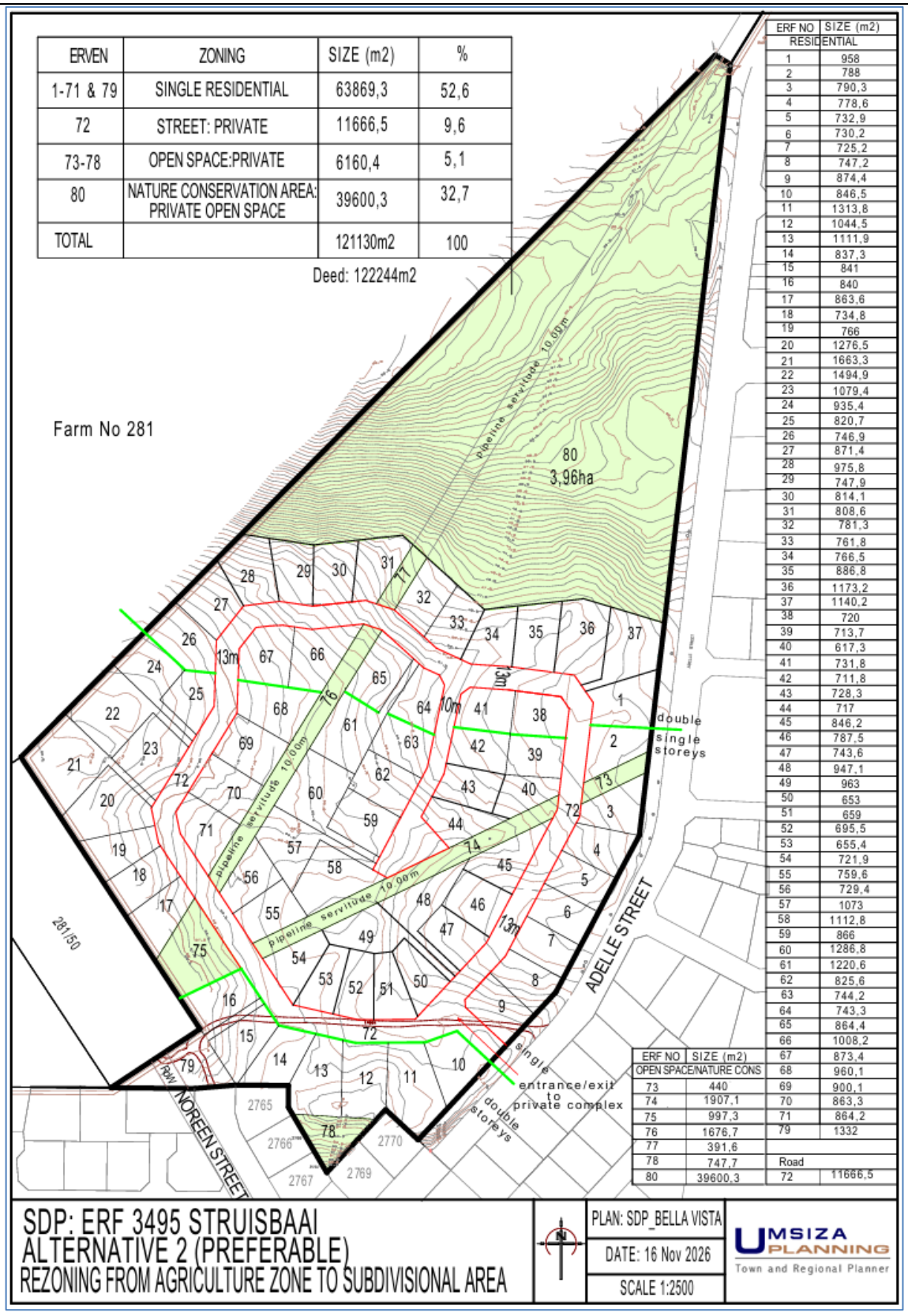


Figure 1: Proposed site development plan (Preferred Alternative 2).

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

Access to the proposed development site, for the preferred Alternative 2 layout will be obtained directly from Adelle Street, an existing municipal road which directly abuts the eastern boundary of Erf 3495, Struisbaai.

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	1	1	0	0	0	8	0	0	0	0	3	4	9	5	0	0	0	0	0

4.7.	Coordinates of the proposed site(s) for all alternatives:			
	Latitude (S)	34°	48‘	33.51“
	Longitude (E)	20°	2‘	0.56“

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 X	NO
The National Water Act, 1998 (Act No. 36 of 1998) (“NWA”). If yes, attach a copy of the comment from the DWS as Appendix E3.	YES	NO X
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (“NEM:AQA”). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	YES	NO X
The National Environmental Management Waste Act (Act No. 59 of 2008) (“NEM:WA”)	YES	NO X
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 (“NEMBA”).	YES X	NO
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) (“NEMPAA”).	YES	NO X
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.	YES	NO X

3. Other legislation

List any other legislation that is applicable to the proposed activity or development.
N/A.

4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.
Western Cape Provincial Spatial Development Framework (2020) The Western Cape Provincial Spatial Development Framework (WC PSDF), amended in 2020 under the Land Use Planning Act (LUPA, Act 3 of 2014) and the Spatial Planning and Land Use Management Act (SPLUMA, Act 16 of 2013), serves as the overarching provincial spatial roadmap. The framework is structured around three spatial themes, namely Resources, Space-Economy and Settlement. The principal objectives of the PSDF are to direct public and private investment toward spatially targeted transformation zones, promote compact and resource-efficient human settlements, enforce urban containment to prevent outward sprawl, safeguard valuable natural, scenic, and agricultural assets, and strengthen the ecological and built environment's

resilience against climate change risks. The policy advocates a transition toward proactive resource management, green infrastructure, low-carbon development, water security, and ecosystem restoration.

The proposed development directly complies with the PSDF's urban containment mandate because Erf 3495 is located entirely within the established Urban Edge of Struisbaai. The establishment of 72 single residential erven (covering approximately 63869.3 m^2) is a greenfield residential development within the urban edge, directly adjacent to existing residential neighbourhoods to the south and east.

The PSDF's mandate is to safeguard ecological infrastructure and manage natural hazard risks of which thus has been taken into consideration into the layout (Alternative 2). The preferred layout (Alternative 2) set asides, a total of approximately 39 600.3 m^2 as a Conservation Areas that will remain natural and excluded from development. In addition, six Private Open Space erven serve as planted green corridors and stormwater attenuation paths across the development footprint.

Cape Agulhas Municipality Spatial Development Framework (CAMSDF, 2022-2027)

The MSDF's spatial development vision (Section 7.2) is for *"A municipality that offers a good quality of life, rich life experience and diverse economic opportunities, ensures spatial justice and sustainability, and protects natural and heritage assets."* The vision is pursued through eight key strategies (Section 7.3). Five of these are relevant to the proposed development. Key Strategy 1 seeks to create sustainable human settlements through new development in strategic locations with access to basic services, public facilities, economic opportunities and transport. Key Strategy 2 promotes infill residential development within existing settlements to increase densities and improve access to infrastructure and services. Key Strategy 3 seeks to protect protected areas, Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) by keeping them in a natural or near-natural state and permitting only low-impact, biodiversity-sensitive land uses. Key Strategy 7 aims to limit urban sprawl and contain development within defined urban edges, and Key Strategy 8 seeks to protect agricultural land.

At settlement level, the proposals for Struisbaai are set out in Section 8.10.3 and Table 43 (Struisbaai MSDF Proposals) and are mapped on Map 42 (Spatial Development Proposals) and Map 43 (Environment and Heritage Protection). The MSDF describes Struisbaai as the largest coastal settlement in the municipality and a sought-after retirement and holiday destination. The Struisbaai proposals comprise protective actions, which include protecting the surrounding protected areas, CBAs, ESAs and wetlands from development and discouraging development within coastal setback lines; change actions, which include amendments to the urban edge; and new development actions. Under Project 4, the new development actions identify potential eco-estate development west of the existing industrial area, a pocket of land along Adelle Street, and the next phase of Langezandt.

Urban Edge and Settlement Containment

Section 8.6.3 of the MSDF states that the urban edge is intended to direct urban growth, protect environmental resources located outside the urban area, limit urban sprawl, and make better use of infrastructure, public facilities and economic opportunities. Erf 3495 lies within the Struisbaai urban edge. It is bounded by Adelle Street and the existing Ocean View Heights residential development to the east, and by existing residential development to the south. The proposed development does not require any amendment to the urban edge and therefore does not contribute to the MSDF's monitoring indicator for land approved for development outside the delineated urban edges (Section 11.5). The proposal is consistent with Key Strategy 7.

Alignment with the Struisbaai Settlement Proposals

Table 43 of the MSDF identifies a pocket of land along Adelle Street as a potential new development area under Project 4. Erf 3495 is bounded by Adelle Street to the east and falls within this area. Residential development

of the property is therefore consistent with the new development actions that the MSDF identifies for Struisbaai.

Compact Development and Use of Existing Infrastructure

The development will be serviced through extensions of existing municipal networks, as described in the Civil Engineering Report. Water will be supplied from the existing 160 mm diameter municipal watermain along the western road reserve of Adelle Street, with a bulk water meter installed for municipal metering. Sewage will gravitate to the existing 160 mm diameter municipal sewer at the corner of Adelle Street and Santie Street, which drains to the Ocean View Heights pump station, and no pumping will be required. Stormwater will discharge to the existing municipal system in Adelle Street and Karen Close, where the Ocean View Heights attenuation ponds were designed to receive flows from this property. Access will be taken from Adelle Street via Erf 72. The development therefore extends existing infrastructure rather than requiring stand-alone services, in line with Key Strategies 1 and 2.

Section 8.4 of the Cape Agulhas MSDF notes that reservoir storage in Struisbaai only marginally exceeds the required 72 hours of Annual Average Daily Demand (AADD). The SDF also notes that the existing distribution network does not have sufficient capacity to serve future development areas, and that no budget was allocated for network upgrades in the 2024/25 financial year. The proposed development responds to this constraint in four ways. First, the Cape Agulhas Municipality confirmed in a letter of 3 October 2025 that municipal water and sewer services are available to the development. Second, the development's water demand is modest, with a calculated AADD of 0.74 ℓ/s. Third, the Architectural Guidelines reduce reliance on the municipal supply by requiring each erf to install a roof-fed rainwater tank of at least 5 000 litres for garden irrigation and toilet flushing, and water-wise fittings are required throughout. Grey-water systems are encouraged. Finally, the developer will pay bulk contribution levies to the Municipality, and these will go towards upgrading bulk infrastructure.

The 72 single residential erven range from 617.3 m^2 to 1 663.3 m^2 in extent. This equates to a gross density of approximately 5.8 dwelling units per hectare across the 12.22 ha property, approximately 8.7 dwelling units per hectare across the 8.15 ha development footprint, and approximately 11.4 dwelling units per hectare across the 6.38 ha of residential erven. These densities are lower than the MSDF's planning assumption of 15 households per hectare for low-density housing (Table 32). The lower yield is a direct result of the decision to retain approximately one-third of the property (3.96 ha) as a Nature Conservation Area. It is also consistent with the erf sizes and character of the adjoining residential areas, in line with the MSDF's requirement that densification in Struisbaai be context-sensitive and in keeping with the height and character of surrounding development.

Protection of Critical Biodiversity Areas

The subject property supports Agulhas Limestone Fynbos, a Critically Endangered vegetation type, across the entire property, and is mapped as Critical Biodiversity Area 1 (CBA1) in the 2023 Western Cape Biodiversity Spatial Plan. Key Strategy 3 of the SDF and the Struisbaai protective actions seek to keep CBAs in a natural or near-natural state and to protect them from development. The proposed development will permanently transform approximately 8.15 ha (67%) of the property and therefore does not fully align with Key Strategy 3 at the scale of the property. In response, the mitigation hierarchy has been applied as described below.

Avoidance has been achieved through the selection of Alternative 2 as the preferred layout. Alternative 2 avoids 1.9 ha more natural habitat than Alternative 1 and retains the northern 3.96 ha of the property as Erf 80 (Nature Conservation Area: Private Open Space). Erf 80 forms a single block contiguous with natural habitat on the Remainder of Farm 281, rather than a narrow band of vegetation enclosed by erven.

Minimisation and rehabilitation measures have been recommended by the botanical specialist. Erf 80 is to be zoned for nature conservation, secured by a title deed restriction or equivalent legal instrument, and fenced

along its developed edge with fauna-permeable fencing. Alien invasive vegetation is to be cleared across the whole erf before construction, and clearing is to be maintained within Erf 80 during the operational phase. Geophytes and succulents are to be rescued before clearing, and topsoil and seed are to be recovered for re-use. A pre-construction census of *Mimetes saxatilis* (Endangered) is to be undertaken so that the densest stands can be retained where feasible. All landscaping is to use locally indigenous species, and a fire management plan is to be prepared that allows ecological burning of Erf 80 together with the adjoining conservation land.

The botanical specialist rates the residual impact of Alternative 2 on Agulhas Limestone Fynbos and the CBA1 as Medium Negative, which is the level at which a biodiversity offset must be considered. The Paapekuilsfontein Conservation Master Plan proposes approximately 327 ha of conservation areas on the wider Paapekuilsfontein property. These areas are approximately 40 times the size of the Alternative 2 development footprint, comprise the same vegetation type on the same limestone substrate, and would secure the ecological connection between the Struisbaai urban edge and Agulhas National Park. If these areas are formally secured and managed, the cumulative impact of Alternative 2 on Agulhas Limestone Fynbos would reduce from Medium Negative to Low Negative.

This approach is consistent with Section 8.6.2 of the MSDF, which requires the integrity of CBAs and ESAs to be maintained and strengthened, and which proposes a proactive initiative to enhance the continuity of the biodiversity network by proclaiming conservation areas. Whether the Conservation Master Plan, or any component of it, should be formalised as a biodiversity offset will be determined by the competent authority, informed by Cape Nature.

Agricultural Land

The property lies within the urban edge, supports natural vegetation and is not utilised for agricultural purposes. The development will therefore not result in the loss of cultivated agricultural land. The agricultural aspects of the property are addressed in the Agricultural Compliance Statement prepared by SoilZA (30 September 2026), in support of Key Strategy 8.

Sense of Place, Scenic Quality and Heritage

The Architectural Guidelines include controls intended to maintain the visual character of the area. Single storey houses are required on the 45 central ridge-line erven, with double storey houses permitted on 27 erven along the northern and southern edges. The Visual Impact Assessment (Terra+ Landscape Architects, Draft, 18 November 2026) supports the single storey restriction on the ridge line, but finds that the double storey edge zones are the most exposed edges of the development when seen from outside the estate, and requires that they be verified through visual simulations from Viewpoints 1, 2, 6 and 7 before the Architectural Guidelines are finalised. Houses are to comprise simple pitched-roof forms finished in warm off-white render and local stone under dark grey or charcoal matt roofs, and gardens are to be planted with locally indigenous species, for which the plant palette of the Master Landscape Plan is to be revised in accordance with the VIA. Outdoor lighting is limited to low-level, shielded, downward-facing fittings with a colour temperature of 3 000 K or less to limit pollution along the coast. With these measures, the VIA rates the construction phase visual impact as Low Adverse and the operational phase visual impact as Low to Moderate Negative after mitigation. No historic or culturally significant precinct identified in the MSDF is affected by the development. The Palaeontological Impact Assessment recommends that a Fossil Finds Procedure be implemented during excavation, and this will be incorporated into the EMPr.

MSDF Alignment Checklist

Section 11.4 of the MSDF provides a checklist for assessing the alignment of development proposals. The property is located within a CBA, and the development's response to this is set out under the Protection of Critical Biodiversity Areas heading above. The proposal partially protects and enhances existing ecological

systems through the retention, legal protection and rehabilitation of Erf 80, linked to the Paapekuilsfontein Conservation Master Plan. It will not result in the loss of cultivated agricultural land, and it is located within, rather than outside or on, the Struisbaai urban edge. The property does not lie within a coastal setback, river or estuarine setback, or flood line. Rainwater collection is mandatory, and grey-water re-use and solar photovoltaic energy are encouraged through the Architectural Guidelines. Potential impacts on sense of place are managed through storey zoning, material controls and lighting controls, with the double storey zones on the northern and southern edges subject to verification through visual simulations in terms of the VIA. Finally, the development extends existing water, sewer, stormwater and road networks at Adelle Street rather than relying on stand-alone services.

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.

The guidelines considered relevant to the proposed development on Erf 3495, Struisbaai, are listed below, together with an explanation of how each has informed the development proposal and the Basic Assessment process.

EIA Guideline and Information Document Series (March 2013)

The Department of Environmental Affairs' EIA Guideline and Information Document Series was applied to the various components of this Basic Assessment process. The specific guidelines considered are set out below.

Guideline for the Review of Specialist Input in the EIA Process

This guideline informed the appointment, briefing, and review of the specialists involved in the Basic Assessment process. The specialists referred to the guideline in preparing their assessments, and the Environmental Assessment Practitioner (EAP) reviewed their findings for adequacy, consistency, and relevance to the proposed development. The specialist findings informed the identification of impacts, the evaluation of the layout alternatives, and the mitigation measures included in the Environmental Management Programme (EMPr).

Guideline for Environmental Management Plans

This guideline was considered in preparing the EMPr that accompanies this report. The EMPr consolidates the impacts identified by the specialists and the measures recommended to avoid, minimise, or manage them. It also sets out how these measures are to be implemented, monitored, and audited during the construction and operational phases. This ensures that impacts on the development site and its surroundings are avoided where feasible and otherwise reduced.

Guideline on Alternatives

This guideline was considered in establishing and comparing the layout alternatives. The specialist team assessed two layout alternatives. Alternative 2 was identified as the preferred alternative because it is the layout of least environmental sensitivity. It confines development to the southern portion of the erf and excludes the northern portion. The no-go alternative was also assessed, as required. It is not the preferred alternative, as the applicant intends to develop the site. The specialist findings informed the preference for Alternative 2.

Guideline on Need and Desirability (Department of Environmental Affairs, 2017)

This guideline was considered in the application for Environmental Authorisation. It assists in understanding the social, economic, and environmental impacts that must be taken into account, including the nature, scale, and location of the proposed development and the wise use of land. The need and desirability of the proposed development is addressed in **Section E** of this report.

Guideline on Public Participation (Department of Environmental Affairs, 2017)

This guideline was considered in designing and conducting the public participation process, which was undertaken in accordance with Chapter 6 of the EIA Regulations, 2014 (as amended).

Western Cape Biodiversity Spatial Plan and Guidelines (2023)

The Western Cape Biodiversity Spatial Plan (WCBSP) Handbook and Guidelines are a key tool for land-use planning and environmental decision-making in the province. The WCBSP identifies, maps, and protects areas critical for maintaining biodiversity, ecological processes, and climate resilience. Through its classification of Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs), it ensures that sensitive ecosystems and priority habitats are recognised and safeguarded before development decisions are made. This helps prevent irreversible biodiversity loss and promotes long-term ecological sustainability.

The WCBSP also emphasises the maintenance of ecological connectivity. It highlights the importance of protecting natural linkages such as rivers, wetlands, coastal systems, and ecological corridors, so that landscape functioning and species movement can continue. This connectivity is essential for ecosystem resilience, particularly under climate change. By safeguarding these areas, the WCBSP also supports climate adaptation and reduces risks associated with flooding, erosion, and drought.

The WCBSP identifies Erf 3495 as falling almost entirely within a Critical Biodiversity Area 1 (CBA 1) with small portion located on the southern portion of the property, remaining unclassified. Land in this category must be maintained in a natural or near-natural state, with no further loss of natural habitat permitted and only low-impact, biodiversity-sensitive land uses supported. This classification is corroborated by the Botanical Specialist, who recorded the following:

- The site contains Critically Endangered Agulhas Limestone Fynbos.
- It supports several limestone-endemic plant species.
- It hosts numerous Species of Conservation Concern (SCCs), including *Mimetes saxatilis* (Endangered), *Gladiolus variegatus* (Vulnerable), and *Leucadendron meridianum* (Near Threatened), among others.

These requirements were considered highly relevant to the proposed activity. The botanical specialist assessment (October 2026) rates the loss of Critically Endangered Agulhas Limestone Fynbos, CBA1 habitat and *Mimetes saxatilis* habitat as High Negative before mitigation for both alternatives. With mitigation, the residual impact of Alternative 2 is Medium Negative, while that of Alternative 1 remains High Negative. The presence of *Mimetes saxatilis* at its easternmost distribution limit further heightens the conservation significance of the site, as additional losses could escalate the species' threat status. These sensitivities align directly with the WCBSP objective of preventing further habitat loss in CBA 1 areas.

National Biodiversity Offset Guideline (2023)

The National Biodiversity Offset Guideline (Government Notice No. 3569, Government Gazette No. 48841, 23 June 2023) was applied to determine whether a biodiversity offset is required for the proposed development. It provides a standardised national framework for when offsets are necessary, how they should be designed, and the conditions under which they may be used to address residual impacts associated with the loss of

biodiversity. The guideline positions offsetting as the final step of the mitigation hierarchy: avoid, minimise, rehabilitate and, only then, offset. An offset is required only where a significant residual impact on biodiversity remains after all reasonable measures to avoid and minimise impacts have been applied. An offset may not be used to justify a development that has not first given effect to the earlier steps of the hierarchy. The guideline also recognises that some residual impacts cannot be offset, particularly impacts on irreplaceable biodiversity or impacts for which no suitable offset receiving area can be found. The risk that an impact cannot be offset must therefore be considered explicitly.

The mitigation hierarchy has been applied to the proposed development. Alternative 1, which provided for 84 erven, a development footprint of approximately 10.16 ha and a 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 and reduces the footprint to approximately 8.15 ha, avoiding a further 2.0 ha of habitat. It also retains the northern 3.96 ha as Erf 80, a single no-development area that adjoins the natural habitat on the Remainder of Farm Paapekuilsfontein No. 281 (RE/281) and maintains the connectivity function of the CBA1. Construction-phase and operational measures to minimise and rehabilitate impacts are set out in the EMPr.

Despite these measures, the Botanical and Terrestrial Biodiversity Impact Assessment (McDonald, October 2026) and the Terrestrial Animal Site Sensitivity Verification and Species Specialist Assessment (Venter & Swart, November 2026) confirm that the development of Alternative 2 will result in residual impacts on biodiversity. These comprise the permanent loss of approximately 8.15 ha of Critically Endangered Agulhas Limestone Fynbos within a Critical Biodiversity Area 1 (CBA1), including limestone outcrop habitat. They also comprise the loss of part of the local subpopulation of *Mimetes saxatilis* (Endangered), which lies at the eastern limit of its range and cannot be transplanted, together with associated limestone endemics, and the loss of faunal habitat of High Site Ecological Importance. The specialists assess these residual impacts as Medium Negative after mitigation. The botanical specialist confirms that on-site mitigation cannot reduce them further, as the only scope to address the loss of Critically Endangered vegetation is the protection of equivalent habitat elsewhere. A biodiversity offset is therefore required for the proposed development.

The offset requirement was determined using the standard approach of the guideline. In the look-up table in Annexure A of the guideline, Agulhas Limestone Fynbos is listed as Critically Endangered, with a Remaining Ecosystem Extent of 92% and an Ecosystem Protection Level of Poorly Protected, giving a starting offset ratio of 30:1. No adjustment of the ratio is proposed, as the affected habitat is largely intact and in fair to good condition. Applying this ratio to the development footprint of approximately 8.15 ha, an offset of approximately 244.5 ha of Agulhas Limestone Fynbos in comparable or better ecological condition is required. The offset area must:

- 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 final ratio and offset requirement will be determined by the competent authority, informed by CapeNature and SANParks.

The proposed mechanism to meet this requirement is the Paapekuilsfontein Conservation Master Plan (also referred to as the Struisbaai Conservation Master Plan). The Master Plan is a landscape-scale conservation framework covering the remaining open space on Erf 3495 and RE/281, both of which are owned by the applicant. It identifies conservation areas of approximately 327 ha on RE/281, which:

adjoin Erf 3495 and Erf 80;

comprise Agulhas Limestone Fynbos on the same limestone substrate within the same CBA1; and

extend westwards to adjoin Agulhas National Park and the Private Nature Reserve on Erf 1032, Struisbaai.

The proposed conservation areas therefore exceed the offset requirement of approximately 244.5 ha for Erf 3495. Erf 80 is retained as an avoidance measure and will be managed as part of the same conservation unit, but is not counted towards the offset area. The conservation areas are proposed as a single, property-wide conservation commitment for Erf 3495 and for the future developments identified on RE/281. Each of those future developments 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 botanical specialist states that 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, comprise the same vegetation type on the same 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, subject to five conditions:

- the conservation areas must be legally secured in perpetuity;
- a management plan, with a responsible management authority and secured funding, must be in place;
- the conservation areas must be mapped and their vegetation and species of conservation concern verified in the field;
- the conservation areas must be secured before, or at the same time as, the loss of habitat on Erf 3495; and
- the adequacy of the conservation areas must be demonstrated against the combined residual impacts of all the Master Plan developments.

On this 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. The faunal 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. They retain their site-level impact ratings, and leave the determination of whether any additional conservation mechanism is required to the competent authority, informed by the relevant conservation authorities.

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
Agricultural Theme – Medium Sensitivity The Screening Tool classifies the site as medium agricultural sensitivity. In accordance with the Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Agricultural Resources, an Agricultural Compliance Statement was prepared, and the report will be submitted as one of the appendices in the BAR. The specialist found that the cropping potential of the site is limited by a combination of climatic constraints (arid climate), terrain constraints (steep slopes on old dune topography), and soil constraints (very sandy soils

of low water-holding capacity and shallow soils overlying a hardpan horizon). The site and its surroundings have never been used for agricultural production and are unsuitable for viable rain-fed crop production.

On the basis of the on-site verification, the specialist disputed the medium sensitivity classification of the Screening Tool and verified the entire site as being of **low** agricultural sensitivity.

An agricultural impact is a change in the future agricultural production potential of land, which in this instance arises from the exclusion of agriculture from the development footprint. The specialist concluded that the development footprint falls below the threshold at which land should be conserved for agricultural production, and that the proposed development will result in a negligible loss of future agricultural production potential. The agricultural impact is therefore assessed as being of low significance and acceptable. The specialist recommends that the development be approved from an agricultural perspective, and this recommendation is not subject to any conditions. No mitigation or monitoring measures for inclusion in the EMPr are required.

Animal Species Theme – High Sensitivity

The National Web-Based Environmental Screening Tool identifies Erf 3495 as being of **High** sensitivity for the Animal Species Theme. Because High sensitivity was confirmed, a full Terrestrial Animal Species Specialist Assessment Report has been compiled rather than a Compliance Statement. This rating is based on the potential occurrence of eight animal Species of Conservation Concern (SCC) within the study area, as listed in **Table 2** below. Four of these species are flagged at High sensitivity and four at Medium sensitivity.

The Western Cape Biodiversity Spatial Plan (2023) maps Erf 3495, together with the wider Paapekuilsfontein property, as Critical Biodiversity Area 1 (CBA 1). The site supports Critically Endangered Agulhas Limestone Fynbos, which provides foraging, breeding and refuge habitat for a range of fauna associated with the limestone landscapes of the Agulhas Plain. The Faunal Specialist confirms that Erf 3495 forms part of a larger connected landscape extending westwards towards the Agulhas National Park, rather than being an isolated habitat patch. Maintaining habitat connectivity matters for two groups of fauna:

- Mobile species, such as raptors and bustards, rely on connected natural habitat for movement, dispersal and access to foraging and breeding areas.

- Less mobile species, such as the Southern Adder, Fynbos Buttonquail and Scarce Mountain Copper, rely on continuity between habitat patches to maintain local populations, recolonise areas after disturbance such as fire, and persist in the longer term.

The specialist also recorded three broad faunal habitats on the site:

- Bottomland habitat in the north, characterised by deeper sandy soils and dense stands of *Acacia cyclops*;

- Sloped habitat, which is rocky and supports restios and *Leucadendron*; and

- Flatland habitat, dominated by limestone rock slabs with restios, *Protea* and *Leucadendron*.

Species recorded during the survey included Cape Grysbok, Cape Golden Mole, Angulate Tortoise, the Rûens Velvet Worm and a diverse fynbos bird assemblage, including Cape Sugarbird and Orange-breasted Sunbird.

None of the eight Screening Tool SCC was directly observed during the survey. The specialists nevertheless confirmed that the site provides actual or potentially suitable habitat for six of them. The outcome for each species is summarised below.

Table 2: Species Identified in the screening tool report.

Species	Screening Tool Sensitivity	Likelihood occurrence/ habitat suitability	Site Ecological Importance
Black Harrier (*Circus maurus*)	High	Highly suitable foraging habitat and suitable breeding habitat. Recent research-grade records exist in the area.	High
Denham's Bustard (*Neotis denhami*)	High	Currently moderately unsuitable because the vegetation is long unburnt. Would become highly suitable after fire.	Medium
Southern Black Korhaan (*Afrotis afra*)	High	Currently suboptimal because the vegetation is dense. Moderate-to-high likelihood of occurrence in the area, with use driven by fire.	Medium
African Marsh Harrier (*Circus ranivorus*)	High	Unsuitable. There is no wetland habitat on site.	Very Low
Fynbos Buttonquail (*Turnix hottentottus*)	Medium	Currently low-to-moderate likelihood. Would become highly suitable 2–5 years after fire.	Medium
Southern Adder (*Bitis armata*)	Medium	High likelihood. Suitable rocky limestone fynbos is present, and there are confirmed records from Struisbaai.	High
Scarce Mountain Copper (*Trimenia malagrida maryae*)	Medium	Possible. The host-plant genera *Diosma*, *Agathosma* and *Euchaetis* are present on the site, and associated ants occur nearby	High
Yellow-winged Agile Grasshopper (*Aneuryphymus montanus)*	Medium	Not present. The species is a montane specialist, and the site lies at low elevation near the coast.	Very Low

*The Fynbos Buttonquail is listed as Vulnerable in the Screening Tool but was downlisted to Near Threatened in the 2025 regional Red List.

Alternative 2 (preferred layout) proposes a residential development with 72 residential erven covering a development footprint of approximately 6.38 ha (52.6% of the layout area), private streets approximately 1.16 ha (9.6 %) and private open space approximately 0.61 ha (5.1%). The steep northern portion of the property, approximately 3.96 ha (32.7%), is retained as Erf 80, a Private Nature Conservation Area. The impacts of habitat loss, fragmentation and operational disturbance are rated Medium–High negative before mitigation

and are reduced to Medium negative after mitigation. This applies to faunal connectivity and to the habitat of each SCC with a Medium or High SEI.

Aquatic Biodiversity Theme – Low Sensitivity

The Screening Tool classifies the site as being of low sensitivity for the Aquatic Biodiversity Theme. This is consistent with the absence of watercourses, wetlands, or other aquatic features on the property or in its immediate surroundings. As no aquatic ecosystems occur within the development footprint or its immediate surroundings, no specialist aquatic biodiversity assessment is required.

Archaeological and Cultural Heritage Theme – Very High Sensitivity

The National Web-Based Environmental Screening Tool identifies Erf 3495 as being of **Very High** sensitivity for the Archaeological and Cultural Heritage Theme. Struisbaai and the wider Agulhas area are known for their archaeological and cultural heritage, including the Hotagterklip fishermen's cottages (Provincial Heritage Site), historical fish traps and numerous shipwrecks along the coast.

No dedicated assessment protocol has been prescribed for this theme. Heritage resources are therefore assessed in terms of Section 38 of the National Heritage Resources Act (Act No. 25 of 1999) (NHRA).

A Notification of Intent to Develop (NID) was submitted to Heritage Western Cape (HWC) under Case No. HWC23083108MS0904. In its response, HWC required a Heritage Impact Assessment (HIA) focusing on palaeontology and the visual impact on the cultural landscape. HWC did not require a separate archaeological assessment. The HIA was compiled by Ms Cindy Postlethwayt (APHP-accredited heritage practitioner).

The heritage practitioner found that the site has no intrinsic historical, architectural or archaeological significance. Its heritage value lies mainly in its natural and visual qualities as an open, elevated fynbos ridge at the edge of Struisbaai, and in its palaeontological potential. The relevant heritage issues for the proposed development are therefore palaeontology and visual impact on the cultural landscape.

Civil Aviation Theme – High Sensitivity

The National Web-based Screening Tool identifies the site as having high sensitivity under the Civil Aviation Theme. This classification is typically applied to areas located within proximity to registered airfields, flight paths, or aviation infrastructure where tall structures or certain land uses could potentially interfere with air traffic operations or pose safety risks. Accordingly, the proposed development is not expected to have any negative impact on civil aviation operations. No further assessment is required.

Defence Theme – Low Sensitivity

The National Web-based Screening Tool identifies the site as having low sensitivity under the Defence Theme. This classification indicates that the proposed development is not located within or near any areas of strategic importance to national defence, nor within zones restricted for defence activities. As such, the proposed development is not expected to interfere with any defence operations or infrastructure. No further assessment is required.

Palaeontology Theme – Very High Sensitivity

The National Web-Based Environmental Screening Tool identifies Erf 3495 as being of Very High sensitivity for the Palaeontology Theme. The site is underlain by the Waenhuiskrans Formation, a calcrete-capped Quaternary aeolianite (fossil dune) that SAHRIS rates as Very High palaeontological sensitivity because fossil bones have previously been found in coastal developments within this formation.

A NID was submitted to Heritage Western Cape, correspondence to the NID required a Palaeontological Impact Assessment (PIA) to be undertaken for the project site. The PIA was compiled by John Pether and will be incorporated into the BAR as an appendix. The specialist acknowledged the Very High rating of the Waenhuiskrans Formation but found that the actual palaeontological significance of the site is **Moderate**, for the following reasons:

- Any fossil bones on site are expected to be of later Quaternary age (approximately 160 000 to 100 000 years old). They would mainly represent animal species that are still living today and are already well known from archaeological sites in the region.

- The site lies on an elevated ridge crest. Springs or vleis, which attract animals and concentrate fossil bones, are unlikely to have occurred there.

- Hyaena burrows, which can hold rich bone accumulations, are more likely on eroding slopes than on the flat ridge where development is proposed.

- The dense fynbos cover means a surface survey is unlikely to reveal fossils, so the risk can only be managed during excavation.

The development involves shallow excavations, namely house foundations (about 0.6 m deep) and service trenches (up to about 1.2 m deep). These will disturb the capping calcrete and the sands directly beneath it. Fossils may be uncovered and destroyed during construction. Without mitigation, the impact is rated Medium Negative. Because fossil locations cannot be predicted and full-time monitoring is not practical, the specialist recommends that a Fossil Finds Procedure be included in the EMPr.

Plant Species Theme – High Sensitivity

According to the National Web-based Screening Tool report identifies the site as High Sensitive due to likely occurrence of 46 plant species of conservation concern. The site is mapped as Agulhas Limestone Fynbos which is Critically Endangered vegetation type. The botanical specialist (Appendix G2, October 2026) recorded eight plant species of conservation concern and limestone endemics on the site, including *Mimetes saxatilis* (Endangered), which occurs within the development footprint, lies at the eastern limit of its range and cannot be transplanted, and *Leucospermum patersonii, Gladiolus miniatus* and *Gladiolus variegatus* (all Vulnerable).

Alternative 2 has been adopted as the preferred layout. Compared with Alternative 1, it avoids an additional 1.9 ha of habitat and retains 3.96 ha (32.7%) of the erf as the Erf 80 Nature Conservation Area. Erf 80 is a single block that adjoins natural habitat on RE/281. Development of Alternative 2 will nevertheless result in the permanent loss of approximately 8.15 ha of Critically Endangered Agulhas Limestone Fynbos. It will also result in the loss of individuals and habitat of plant SCC within the development footprint, including part of the local *Mimetes saxatilis* subpopulation, which lies at the eastern limit of the species' range and cannot be transplanted.

The Botanical Specialist rates this impact as High negative before mitigation. With mitigation, it reduces to Medium negative, provided that a pre-construction survey of *Mimetes saxatilis* is carried out.

Terrestrial Biodiversity Theme – Very High Sensitivity

The National Web-Based Environmental Screening Tool identifies Erf 3495 as being of Very High sensitivity for the Terrestrial Biodiversity Theme. The rating is triggered by the property's location within Agulhas Limestone Fynbos (Critically Endangered), a Critical Biodiversity Area 1 (CBA1), Ecological Support Areas, the National Protected Area Expansion Strategy focus area and the Agulhas National Park buffer.

The Site Sensitivity Verification, undertaken by Dr D.J. McDonald of Bergwind Botanical Surveys & Tours, confirmed the Very High sensitivity rating. The entire erf supports Agulhas Limestone Fynbos which is in fair to good condition, and almost the entire erf is mapped as CBA1. The site is also contiguous with natural habitat on the adjoining RE/281, which extends westwards towards Agulhas National Park. The existing tracks, pipeline servitude and disturbed area near the reservoirs are of lower sensitivity, but they are small and do not alter the overall rating. Alien vegetation presence and woodcutting debris are degrading parts of the site, and the fynbos is mature and in places senescent owing to a long absence of fire.

The proposed development would result in the permanent loss of approximately 8.15 ha of Critically Endangered vegetation and CBA1 habitat under the preferred Alternative 2. The retained habitat would be exposed to edge effects, including fire exclusion, trampling, dumping, pets, alien plant spread and invasion by the Argentine ant. Alternative 2 limits these impacts by retaining the northern 3.96 ha (Erf 80) as a single conservation block that remains connected to RE/281. With mitigation, the specialist rates the residual loss of habitat as Medium Negative. The residual impacts of fragmentation and alien invasion are rated Low Negative. Alternative 1 is not supported, as its residual impacts remain High Negative.

Because a Medium Negative residual impact remains on a Critically Endangered ecosystem and a CBA1, a biodiversity offset must be considered. The botanical specialist considers that the Struisbaai Conservation Master Plan, a draft concept option proposing approximately 327 ha of conservation areas on RE/281, may take the place of a biodiversity offset if specific conditions are met, and notes that the extent of Agulhas Limestone Fynbos within these areas has not been verified in the field. The faunal specialist regards the Master Plan as additional landscape-scale mitigation that does not alter the residual impact ratings.

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.	The extent of the proposed development is approximately 8.15 ha, excluding the conservation area proposed.
28	Residential, mixed, retail, commercial, industrial, or institutional developments where such land was used for agriculture, game farming, equestrian purposes, or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.	The property is zoned Agricultural Zone 1. Although it lies within the Cape Agulhas Municipality urban edge, DEA&DP determined that the site is outside the built-up urban area, and sub-paragraph (ii) is applied on that basis. The proposed residential development will cover a development footprint of approximately 8.15 ha, which exceeds the 1 ha threshold.

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 meters or more of indigenous vegetation 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.	Approximately 81529.7 m^2 of Agulhas Limestone Fynbos vegetation, classified as Critically Endangered will be cleared for the establishment of 72 residential erven, private access roads and private open spaces.
Note: • The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted. • Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.		

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

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

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

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

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

There are no alternative sites that were considered for this proposal, other than the subject property, Erf 3495, located in Struisbaai within the Cape Agulhas Municipality. The property is currently zoned as Agricultural Zone 1, although it has never been used for farming and is situated on the western side of Adelle Street, within the established urban edge of Struisbaai, directly adjacent to existing residential settlements to the east and south. The property falls within a serviced urban area with existing municipal infrastructure and access roads in close proximity. The internal road network will connect to Adelle Street, which is the main access point to the property. Water, sewer, and electrical services will therefore be connected to the development without requiring major extensions of service infrastructure. This minimises potential environmental impacts that would otherwise arise if the development was located outside the established urban edge.

The property covers approximately 12.22 hectares, and its location within an established residential area ensures that the proposed development will be compatible with surrounding land uses. The development proposal involves the rezoning and subdivision of Erf 3495 into single residential erven designed to align with the character and density of the existing neighbourhood. Under the preferred site development plan, referred to as Alternative 2, the primary objective is to subdivide the property into 72 single residential erven, alongside the provision of six open space erven, an internal road network with one access off Adelle Street, and associated infrastructure. A key feature of the plan is the allocation of the northern portion of the site as a nature conservation area, which will remain undeveloped and serve as private open space, for preservation of the ecological features associated with the Agulhas Limestone vegetation type.

The preferred site development plan makes provisions for the following components:

Main Components of the development

Residential erven

→ The development will consist of 72 single residential erven covering a combined area of approximately **63869.3 m^2.**
→ Individual plot sizes range from 617.3 m^2 to 1663.3 m^2
→ Each erf will accommodate a single residential dwelling with associated outbuildings (e.g., garages, patios). Architectural guidelines will ensure cohesive design and integration with the surrounding built environment.

Private Roads

→ An internal road network will be established off Adelle Street to provide access to each residential erf.
→ Roads will be up to 6 m wide within 13 m road reserves (Erf 72), accommodating vehicular access, stormwater drainage, and pedestrian walkways where applicable.
→ The total road footprint amounts to approximately **11666.5 m^2**

Open space (Private)

→ A total of six (6) private open space erven (Erven 73–78) is proposed, covering a combined area of approximately **6160.4 m^2**.
→ Two 10-metre municipal pipeline servitudes traverse the site within these open space corridors.

Nature Conservation Area

- → Erf 80 (approximately 39,600.3 m^2) has been designated as a Nature Conservation Area.
- → This portion of land will be retained in its natural state and managed for biodiversity conservation.

Associated infrastructure

Water

The water connection for the proposed residential development on Erf 3495 will be made to the existing municipal water reticulation network of the Cape Agulhas Local Municipality. Specifically, the development will connect directly to an existing 160 mm diameter municipal watermain positioned along the western road reserve edge of Adelle Street, which tees off from an existing 200 mm diameter main supplying Ocean View Heights. A municipal bulk water meter will be installed at this connection point for municipal consumption metering.

To link the development to the municipal main and reticulate water internally across the site, the required pipeline network will consist of 110 mm diameter uPVC Class 16 piping. These pipelines will be laid within the private road reserve behind the road kerbs, installed in trenches measuring up to 1.0 m deep and 700 mm wide. The main supply connection is sized to convey a total peak design capacity of 17.9584 ℓ/s, which accommodates the projected domestic Peak Flow of 2.9584 ℓ/s (calculated from an Annual Average Daily Demand of 0.7396 ℓ/s across the 72 residential erven) alongside the required firefighting supply requirement of 15 ℓ/s at a 15 m minimum residual head.

Two existing municipal reservoir supply pipelines traverse the property within dedicated 10-metre-wide servitudes. The Cape Agulhas Local Municipality strictly prohibits any direct connection to these bulk reservoir lines, and construction contractors must ensure that these pipelines remain fully protected and undisturbed throughout all building phases.

Sewer

The proposed residential development on Erf 3495 will be equipped with a full internal waterborne gravity sewer reticulation network servicing all 72 residential erven. Due to the favourable natural slope and elevation of the property, wastewater will drain entirely by gravity without requiring any internal sewage pumping stations. Internal pipelines will consist of 110 mm Ø and 160 mm Ø Class 34 heavy-duty uPVC solid wall pipes, installed beneath surfaced road reserves in trenches up to 2.5 metres deep.

The proposed development's internal sewer reticulation will connect directly to the existing municipal infrastructure via a 160 mm Ø gravity sewer main situated at the intersection of Adelle Street and Santie Street. Effluent will flow through this municipal line into the Ocean View Heights sewer pump station located at Peggy Close. The Cape Agulhas Miunicipality confirmed in writing that sufficient municipal sewage capacity is available for the development.

The total sewage generated across the 72 single residential plots (calculated at a design allowance of 630 litres per unit per day) equates to a Daily Dry Weather Flow (DDWF) of 0.5177 ℓ/s and an Instantaneous Peak Wet Weather Flow (IPWWF) of 1.5531 ℓ/s.

Electricity

Electrical power for the proposed residential development on Erf 3495 will be supplied directly by the Cape Agulhas Local Municipality (not Eskom), following the bulk load evaluation prepared by specialist electrical engineers Converge Consulting. Each of the 72 single residential erven will be equipped with an individual

municipal prepaid meter. Property owners will apply directly to the Cape Agulhas Municipality for their electrical service connection and will be responsible for the municipal connection fee and meter costs.

Internal electrical distribution lines will be reticulated underground within shared utility trenches behind the road kerbs to preserve streetscape aesthetics. To allow seamless municipal service connections from the street, each individual property owner must install two 110 mm underground service sleeves beneath their driveway where it crosses the road verge.

Solid Waste

Solid waste and household refuse generated by the proposed residential development on Erf 3495 will be collected, managed, and disposed of by the Cape Agulhas Local Municipality.

The internal private road network and turning circles (13-metre road reserves) have been specifically engineered to accommodate municipal refuse collection vehicles, ensuring comfortable movement and access to all 72 residential erven.

To maintain streetscape aesthetics and environmental hygiene, the development's architectural guidelines require that individual refuse bins on each erf be fully screened from public view. All refuse bins must be stored within enclosed service courtyards or behind screen walls attached to the main dwelling, so they are not visible from the street, private open spaces, or neighbouring properties.

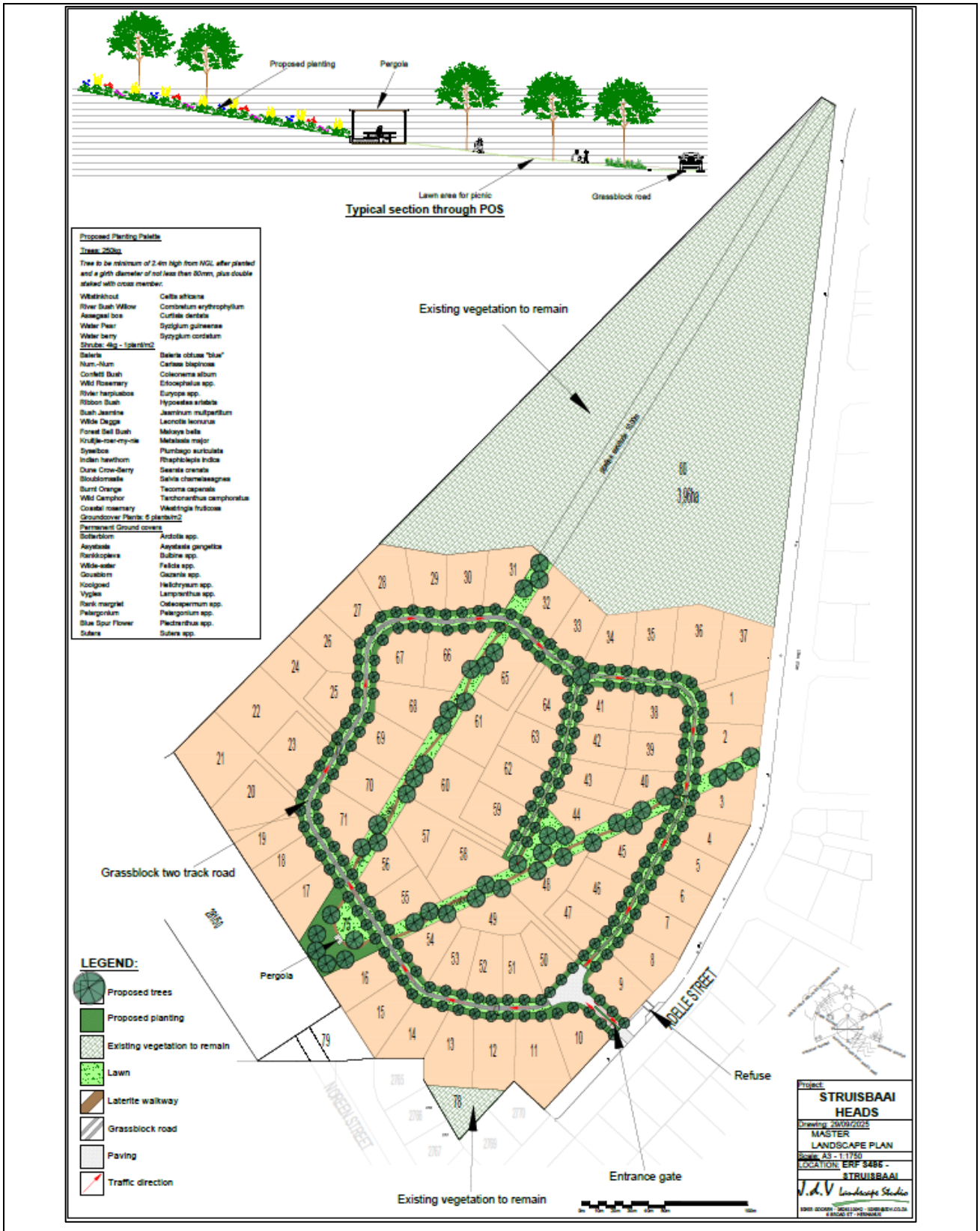


Figure 2: View of the Landscape Plan of the proposed development.



Figure 2-2: The landscape plan proposed showing the view of houses for the proposed residential development.



Figure 2-3: The landscape plan proposed showing the view of houses for the proposed residential development.

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?

The property is currently zoned as Agricultural Zone 1, although it has never been used for farming purposes and is situated within the urban edge of Struisbaai. As such, the proposed residential development does not align with the existing land use designation, since the current zoning does not permit the intended subdivision and residential use. To address this, the application includes provisions for the rezoning of the property from Agricultural Zone 1 to Subdivisional Area, which would allow for the establishment of single residential erven and associated infrastructure.

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.

N/A

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, with the 2020 Chapter 4 Amendment)

The Western Cape Provincial Spatial Development Framework (PSDF) was adopted in 2014 as the product of provincial inter-departmental and inter-governmental collaboration, undertaken with the private sector, academia and non-governmental organisations. It is regarded as compliant with the Western Cape Land Use Planning Act, 2014 (Act 3 of 2014) (LUPA) and the Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013) (SPLUMA). Chapter 4 of the PSDF was amended in November 2020 to align PSDF implementation with the Provincial Strategic Plan 2019–2024 and to set priority interventions for the following five years. The PSDF, read together with the November 2020 Chapter 4 Amendment (hereafter "the PSDF"), is the version applied in this assessment.

The PSDF is a provincial policy framework. It sets a spatial vision and spatial agenda, identifies key spatial transitions, and guides the location and form of public investment in the natural and built environments. It seeks to move the Province towards:

- more inclusivity, productivity, competitiveness and opportunities in urban and rural space-economies;
- better protection of spatial assets (including cultural and scenic landscapes) and strengthened resilience of natural and built environments; and
- improved effectiveness in the governance of urban and rural areas.

The PSDF is organised around three spatial themes, namely Resources (spatial assets), Space-Economy and Settlement, under which thirteen policies are grouped (Figure 31 of the 2020 Chapter 4 Amendment):

Resources

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; R4 Recycle and recover waste, deliver clean energy sources, shift from private to public transport, and adapt to and mitigate against climate change; R5 Safeguard cultural and scenic assets.

Space-Economy

E1 Use regional infrastructure investment to leverage economic growth; E2 Diversify and strengthen the rural economy; E3 Revitalise and strengthen urban space-economies as the engine of growth.

Settlement

S1 Protect, manage and enhance sense of place, cultural and scenic landscapes; S2 Improve inter- and intra-regional accessibility; S3 Promote compact, mixed-use and integrated settlements; S4 Balance and coordinate the delivery of facilities and social services; S5 Promote sustainable, integrated and inclusive housing in formal and informal markets.

Site and development context

Erf 3495, Struisbaai, is approximately 12,22 ha in extent and falls within the jurisdiction of the Cape Agulhas Municipality. The property is vacant land straddling adjacent east–west orientated calcreted ridge crests on the south-western outskirts of Struisbaai and is accessed from the R319 via Adelle Street. It adjoins existing

residential development (Ocean View Heights and the residences along Adelle Street) to the south and east, and the Remainder of Farm 281 (Paapekuilsfontein) to the west and north.

The preferred layout (Alternative 2) provides for 72 single residential erven with associated roads, services and private open space, confined to the southern portion of the property. The development footprint of Alternative 2 is approximately 8,15 ha. The northern portion of the property, approximately 3,96 ha, is retained as Erf 80 (Nature Conservation Area: Private Open Space), which is contiguous with natural habitat on RE/281. Alternative 1 (not preferred) has a larger development footprint of approximately 10,16 ha.

The Struisbaai Conservation Master Plan is a draft concept option for the broader Paapekuilsfontein landholding, to be further refined with input from SANParks and CapeNature. It proposes approximately 327 ha of conservation areas across RE/281. The Master Plan is referred to by both the botanical and faunal specialists as a landscape-scale mitigation measure and is addressed under Policy R1 below.

Settlement theme

The Settlement theme seeks to protect, manage and enhance sense of place and cultural and scenic landscapes (S1), to promote compact, mixed-use and integrated settlements (S3), to balance and coordinate the delivery of facilities and social services (S4), and to promote sustainable, integrated and inclusive housing (S5). The key transitions for this theme include a move from "greenfields" development and low-density sprawl towards increased densities in appropriate locations aligned with resources and the space-economy, from limited tenure options and standardised housing types towards a wider range of housing typologies, and from poor quality public spaces towards high quality public spaces.

Location within the existing settlement footprint

The property lies within the Struisbaai urban edge and is contiguous with existing residential development to the south and east. The development therefore consolidates the western edge of the settlement and does not leapfrog urban development into the surrounding rural or natural landscape. It does not give rise to ribbon or dispersed development, and it is serviced by extension of existing municipal infrastructure in Adelle Street (see Policy E1 below). It is acknowledged that the site is undeveloped and that the development is therefore a greenfields development; the extent to which it is consistent with the PSDF transition away from greenfields development rests on its location within the urban edge and on the retention of the northern portion of the site in a natural state.

The CAM SDF (2022–2027) directs that development in Cape Agulhas be contained within defined urban edges (Key Strategy 7) and that critical biodiversity areas be protected and conserved (Key Strategy 3). The CAM SDF proposals for Struisbaai (Table 43) include, under new development of significant scale, a potential eco-estate development to the west of the existing industrial area and a pocket along Adelle Street (Project 4). The relationship of the proposed development to these proposals, and to the urban edge, is addressed in the land use planning application.

Density and form

The PSDF favours increased densities in appropriate locations, aligned with resources and the space-economy. The development is a low-to-medium density single residential layout. This density is considered appropriate to the location because: (i) the site is on the edge of a small coastal settlement; (ii) the site supports Critically Endangered vegetation and is subject to terrain and ridge-line constraints, which have led to the exclusion of approximately one-third of the property from development; and (iii) the layout uses a range of erf sizes (three size bands), which supports a degree of variety in the housing offering. The retention of the northern portion as a conservation area is a deliberate trade-off between density and the protection of the PSDF's spatial assets.

Sense of place and scenic landscape (S1)

Alternative 2 was selected as the preferred layout, in part because it retains the steep and visually exposed northern slope as Erf 80 and restricts the 45 central ridge-line erven to single storey. The draft Architectural Guidelines permit double storey dwellings on 27 erven along the northern edge (Erven 1, 26 to 38, 41 and 64 to 67) and the southern edge (Erven 10 to 16 and 79). The VIA (Draft, 18 November 2026) notes that these zones were placed primarily to protect views within the estate and that, seen from outside the estate, they form the most exposed edges of the development. They are therefore to be verified through visual simulations from Viewpoints 1, 2, 6 and 7, with affected erven restricted to single storey, or the upper floor set back, where required. The Architectural Guidelines further give effect to the protection of scenic quality through:

- maximum building heights of 6,0 m (single storey zone) and 7,5 m (double storey zone), measured from natural ground level based on the pre-earthworks survey, with fill platforms not creating a new natural ground level;
- a limit on upper floors in the double storey zone to 50% of the ground floor footprint, and a prohibition on rooms in the roof space in the single storey zone;
- a restricted palette of natural materials and muted, earthy tones, being warm off-white plaster, local limestone or sandstone, weathered timber, and charcoal or grey matt roof sheeting, with brilliant white walls and reflective roof finishes not permitted;
- minimal, low-level, shielded and downward-facing external lighting of 3 000 K or less, with no floodlights, uplighters or coloured lights, so that the development retains a rural character at night and does not add to light pollution along the coast; and
- visually open fencing (maximum 1,8 m) or low dry-stone walls (maximum 1,0 m) along the boundaries with Erf 80 and private open space, with no tall solid walls on these edges.

The Architectural Guidelines also require gardens to be planted from an approved palette so that houses sit as "islands" within indigenous planting. The VIA, however, finds that the current Master Landscape Plan palette does not yet respond to the requirement for naturally occurring species, as it includes species not indigenous to the Agulhas plain (such as *Rhaphiolepis indica* and *Westringia fruticosa*), riverine and forest trees, lawn and exotic shrubs. The palette is to be revised to locally indigenous species suited to the exposed coastal conditions, in consultation with the botanical specialist. Subject to this revision and to the verification of the double storey zones, these measures are consistent with the PSDF objective of protecting scenic landscapes (Policy S1).

Open Spaces

Private open space and the Nature Conservation Area are integrated into the layout. The two 10 m municipal water pipeline servitudes are retained as Private open space, and access to Erf 80 is provided only through the estate path system, with no private paths or gates from individual erven.

Housing and public investment (S4 and S5)

The development adds formal, serviced residential erven to the Struisbaai housing market. The PSDF recognises that settlements differ in their growth potential and that the response to housing and service provision must be differentiated accordingly. The development is a private sector development; it does not depend on public housing subsidy or provincial capital expenditure, and it therefore does not conflict with the PSDF emphasis on directing public investment to the settlements with the greatest growth potential. It is noted that the development serves the market housing segment and does not, in itself, contribute to the inclusive housing objectives of Policy S5.

Space-Economy Theme

The Space-Economy theme seeks to revitalise and strengthen urban space-economies as the engine of growth (E3), to diversify and strengthen the rural economy (E2), and to use regional infrastructure to leverage economic growth (E1).

The 2018 Growth Potential of Towns Study (GPS18), which the PSDF identifies as a key spatial decision-support tool, classifies Cape Agulhas Municipality as having "medium" development potential. The development of Erf 3495 is a modest, incremental addition to an existing urban settlement and is of a scale consistent with that classification. It does not require the creation of new regional infrastructure or a new node. The development is expected to contribute to the local economy through construction-phase activity and an enlarged rates base for the Municipality, and to support the local tourism and holiday-home economy on which Struisbaai relies.

The PSDF further requires that the alignment of land use decisions with provincial and municipal spatial strategies is tracked, including decisions taken by Municipal Planning Tribunals. The relevant local instrument for Erf 3495 is the Cape Agulhas MSDF; consistency with the MSDF and the development's location within the urban edge are addressed in the town planning application.

Resources theme

Biodiversity and ecological infrastructure (Policy R1)

Policy R1 seeks to protect biodiversity and ecosystem services. The PSDF relies on the WCBSP as the basis for identifying and securing biodiversity priority areas, and the 2020 Chapter 4 Amendment identifies the Western Cape Ecological Infrastructure Investment Framework (2019) as a key informant for the conservation and restoration of ecological infrastructure. This is the policy area in which the development must be assessed most carefully.

The Botanical and Terrestrial Biodiversity Impact Assessment (October 2026) records that:

- the vegetation of Erf 3495 is entirely Agulhas Limestone Fynbos, a Critically Endangered ecosystem, in fair to good condition and disturbed mainly by tracks, invasive *Acacia* species and woodcutting;
- almost the entire erf is classified as Critical Biodiversity Area 1 (CBA1) in the WCBSP (2023);
- the screening tool ratings of High plant species sensitivity and Very High terrestrial biodiversity sensitivity are verified by the field surveys;
- the erf supports *Mimetes saxatilis* (Endangered), a limestone endemic at the eastern limit of its distribution, together with *Leucospermum patersonii* (Vulnerable) and other limestone endemics and species of conservation concern; *M. saxatilis* occurs within the development footprint of both alternatives and cannot be transplanted; and
- habitat retained in contact with RE/281 has a far greater conservation value than habitat retained as isolated patches.

The botanical specialist rates the loss of Agulhas Limestone Fynbos, CBA1 habitat and *M. saxatilis* habitat as High Negative before mitigation for both alternatives. With mitigation, the residual impact of Alternative 2 is Medium Negative, whereas that of Alternative 1 remains High Negative with mitigation. The specialist does not support Alternative 1 and supports Alternative 2 subject to the mitigation measures in the report and to the residual impacts being addressed through formally secured conservation areas. The specialist does not regard the red flags as fatal flaws for Alternative 2, provided that those conditions are met.

The Terrestrial Animal Species Assessment identifies the overall Site Ecological Importance of the faunal receptors as High. The site provides actual or potentially suitable habitat for several faunal species of conservation concern, including Black Harrier (*Circus maurus*), Denham's Bustard (*Neotis denhami*), Southern Black Korhaan (*Afrotis afra*), Fynbos Buttonquail (*Turnix hottentottus*), Southern Adder (*Bitis armata*) and Scarce Mountain Copper (*Trimenia malagrida maryae*). The faunal specialist identifies Alternative 2 as the preferred option from a faunal perspective and confirms that its residual impacts on faunal habitat and landscape connectivity are not altered by landscape-scale conservation measures.

The WCBSP (2023) sets the desired management objective for CBA1 as maintenance in a natural or near-natural state with no further loss of habitat. It states that development should ideally be avoided in CBAs; where it cannot be avoided, the application of the mitigation hierarchy must be demonstrated, and a biodiversity offset may be considered as a last resort where the impact cannot be avoided or reduced to a residual low significance. The proposed development responds to this as follows:

The preferred layout (Alternative 2) confines development to the southern portion of the property and retains the steep northern portion, approximately 3,96 ha, as Erf 80. Erf 80 is retained as a single block contiguous with natural habitat on RE/281, which the botanical specialist identifies as the configuration of greatest conservation value. Alternative 2 reduces the development footprint by approximately 2 ha compared with Alternative 1.

The specialists require, among other measures, a spring census of *M. saxatilis* before the layout is finalised, with the boundary of Erf 80 adjusted to retain the densest stands where feasible; zoning of Erf 80 for nature conservation, protected by a title deed restriction or equivalent instrument and fenced with fauna-permeable fencing on its developed edge; demarcation of the construction footprint; search and rescue of transplantable species and seed collection of Proteaceae; alien invasive clearing of the whole erf; a fire management plan that keeps firebreaks on the developed edge so that Erf 80 can be burnt with RE/281; and controls on lighting, noise, pets and access. These measures are incorporated into the EMPr.

The residual Medium Negative impact on a Critically Endangered ecosystem and CBA1 is the level at which a biodiversity offset must be considered in terms of the National Biodiversity Offset Guideline (2023) and the Western Cape biodiversity offsets guideline (2015). The botanical specialist considers that the Struisbaai Conservation Master Plan (approximately 327 ha, contiguous with Erf 3495 and of the same vegetation type) has the attributes of a landscape-scale offset, and that it can take the place of a biodiversity offset for Erf 3495 only if the conservation areas are legally secured in perpetuity, are subject to a funded management plan, and are secured before or at the same time as the loss of habitat on Erf 3495. Its adequacy must also be demonstrated against the combined residual impacts of all developments proposed in the Master Plan. If the conservation areas on RE/281 are not secured, a separate biodiversity offset for Erf 3495 would be required.

The development is therefore not consistent with Policy R1 on the basis of avoidance alone, since it entails the permanent loss of approximately 8,15 ha of Critically Endangered vegetation within a CBA1. Its consistency with Policy R1 depends on the full application of the mitigation hierarchy, including the secure, long-term protection of Erf 80 and of equivalent habitat on RE/281 through the Conservation Master Plan or a separate biodiversity offset. In line with the WCBSP land-use guidelines, the application is referred to CapeNature for comment, and the adequacy of the offset mechanism rests with the competent authority, informed by CapeNature and SANParks.

Water, climate resilience and risk (Policies R2 and R4)

The 2020 Chapter 4 Amendment notes that the 2019 Western Cape Provincial Risk Profile identifies drought as the highest risk facing the Province, and that the way settlements are planned plays a key role in reducing risk and building resilience. The CAM MSDF records that Struisbaai relies on groundwater for its water supply and that water provision in the town is under pressure. The development responds through the following measures in the Architectural Guidelines and the Civil Engineering Report:

- a rainwater tank of at least 5 000 litres for every house, used for irrigation and toilet flushing;
- water-wise fittings throughout and encouragement of grey water systems;
- stormwater drained to the street system and attenuated, with permeable paving encouraged and hard surfaces kept to a minimum; and
- encouragement of rooftop solar PV and energy-efficient LED lighting.

The annual average daily water demand of the development is estimated at approximately 0,74 ℓ/s, and the Municipality has confirmed the availability of water supply.

Agricultural resources (Policy R3)

Policy R3 seeks to safeguard the Western Cape's agricultural and mineral resources and to manage their sustainable use. The National Web-based Environmental Screening Tool classifies the site as ranging from low to medium agricultural sensitivity. The Site Sensitivity Verification and Agricultural Compliance Statement confirms that the site and its surrounds have never been used for agricultural production, and that the cropping potential of the site is limited by climate (arid; mean annual rainfall of 424 mm), terrain (hilly ridges of old coastal dunes with slopes of 0 to 25%) and soils (predominantly shallow sands on hardpan carbonate, and very sandy soils with low water holding capacity). The specialist disputes the screening tool's medium rating and verifies the entire site as being of low agricultural sensitivity. The specialist concludes that the development will result in a negligible loss of future agricultural production potential and is acceptable.

The PSDF agricultural priority is the conservation of land capable of viable crop production, and not the retention of all agriculturally zoned land. As the property falls below that threshold, the development is consistent with Policy R3. The specialist notes that the property is currently zoned for agriculture, and that the comment of the Department of Agriculture is therefore likely to be required through the land use application process.

Cultural and scenic assets (Policy R5)

The Palaeontological Impact Assessment finds that the excavations for foundations (approximately 0,6 m deep) and services (up to approximately 1,2 m deep) will affect the capping calcrete and underlying sands of the Waenhuiskrans Formation, which is rated Very High palaeontological sensitivity on SAHRIS. Because the site lies on a topographically elevated ridge crest, where a water source attracting animals is unlikely to have been present, the probability of fossil bones being common is reduced. The impact is rated Medium Negative without mitigation and Medium to High Positive with mitigation, since fossils that are found can be rescued for scientific study. The specialist recommends that a Fossil Finds Procedure be included in the EMPr and implemented through the ECO during construction and confirms that the possible presence of fossils does not influence the decision to proceed. The visual and scenic measures described under Policy S1 above further support Policy R5.

The Visual Impact Assessment (November 2026) places the site within a cultural landscape of medium to high scenic, cultural and historical significance, although the site itself is not a declared scenic or heritage resource. The visual sensitivity of the area is rated Moderate, the Visual Absorption Capacity Low to Moderate and the visual intrusion Moderate. The construction phase visual impact is rated Medium Adverse before mitigation and Low Adverse after mitigation, and the operational phase visual impact Moderate Adverse before mitigation and Low to Moderate Negative after mitigation. The VIA recommends the amended Alternative 2 Preferred Layout (16 November 2026) for approval from a visual impact perspective, subject to the implementation of the recommended architectural and landscape mitigation measures, the verification of the double storey edge zones through visual simulations, and a further round of assessment once the Architectural Guidelines and 3D simulations have been developed.

4.2	The Integrated Development Plan of the local municipality.

Cape Agulhas Municipality Integrated Development Plan (2022 – 2027)

The MSDF outlines eight key strategies, namely to:

1. Create sustainable human settlements through new development in strategic locations with access to basic services, public facilities, economic opportunities and public transportation.

2. Promote infill residential development within existing settlements to increase densities and promote access to infrastructure, social services and economic opportunities.

3. Protect and conserve protected areas, critical biodiversity areas and ecological support areas by keeping these areas in a natural or near natural state and only allowing low impact, biodiversity sensitive land uses as appropriate.

4. Create diverse economic opportunities by promoting agriculture and tourism.

5. Protect and enhance historic and culturally significant precincts and places.

6. Eradicate informal settlements and integrate them with formal areas, social facilities and economic opportunities.

7. Limit urban sprawl and contain development within defined urban edges.

8. Protect and conserve agricultural land through strict policy and guidelines.

4.3.	The Spatial Development Framework of the local municipality.

Cape Agulhas Municipality Spatial Development Framework (2022 – 2027)

The Cape Agulhas Municipality Spatial Development Framework (CAMSDF, 2022/27) serves as the core spatial component of the Integrated Development Plan (IDP). Its overarching purpose is to establish a long-term spatial vision, coordinate sector planning, and direct public and private infrastructure investment across the municipality.

Urban Edge and Strategic Infill Development

The proposed development directly aligns with the spatial principles of the Cape Agulhas Municipality by providing greenfield residential development within the established urban edge of Struisbaai. Situated on the western side of Adelle Street and bordering existing residential settlements to the east and south (including Ocean View Heights), the 12.22-hectare site represents a logical extension of the built environment. By utilising land situated inside the defined urban boundary, the proposal avoids urban sprawl, encourages compact municipal development, and ensures efficient land-use integration.

Optimal Land Use and Density Integration

Although the property is currently zoned Agricultural Zone 1, specialist assessments confirm that the land has negligible agricultural value due to arid climate constraints, steep topography, and shallow sandy soils over hardpan. Rezoning and subdividing the land into 72 single residential erven under the preferred Alternative 2 layout optimises land utilisation without removing viable agricultural land from production. The plot sizes and height limitations match the coastal character, plot density, and low-slung visual profile of the surrounding neighbourhood.

Environmental Conservation and Open Space Protection

In accordance with municipal environmental policies and green infrastructure directives, the preferred layout (Alternative 2) prioritises biodiversity preservation by designating Erf 80 (39,600.3 m^2 or ~3.96 ha) representing 32.7% of the total site area as a dedicated Nature Conservation Area. Located on the steep north-facing slope in the north of the property, this area remains undeveloped to protect Agulhas Limestone fynbos vegetation and ecological corridors. Additionally, six private open space erven (Erven 73–78) and two 10-metre wide pipeline servitudes are integrated across the site to maintain green buffers and private open space.

Bulk infrastructure Efficiency and Sustainable goals

The Cape Agulhas Municipality Spatial Development Framework emphasises efficient service delivery and sustainable resource management. Because Erf 3495 is situated adjacent to serviced urban land, all internal water, sewerage, electricity, and road networks connect directly to existing municipal infrastructure along Adelle Street subject to the electrical network upgrades identified in the electrical services report (**Appendix G8**), including 11 kV cabling, transformers, metering and a contribution to shared network costs.

4.4.	The Environmental Management Framework applicable to the area.

No Environmental Management Framework (EMF), as contemplated in Chapter 2 of the Environmental Management Framework Regulations, 2010 (GN R547 of 18 June 2010), has been adopted for the Cape Agulhas Local Municipality or for the area within which Erf 3495 is located. Accordingly, no EMF-defined environmental management zones, sensitivity classifications or zone-specific development controls apply to the property.

In the absence of an applicable EMF, the environmental sensitivity of the site has been determined with reference to the Western Cape Biodiversity Spatial Plan (WCBSP, 2023) and the findings of the specialist assessments undertaken for the proposed development. In terms of the WCBSP (2023), the site is located within a terrestrial Critical Biodiversity Area 1 (CBA1). CBA1 areas are areas in a natural condition that must be safeguarded to meet biodiversity targets, and the associated land management objective is to maintain them in a natural or near-natural state, with no further loss of natural habitat. The specialist assessments further confirm that the underlying vegetation on the subject property has a Site Ecological Importance (SEI) rating of High.

Given the CBA1 designation and the High SEI rating, the proposed development should remain confined to the southern portion of the erf, as provided for under the preferred layout (Alternative 2), with the northern portion of the property excluded from development and retained in its natural state. This approach applies the mitigation hierarchy by prioritising avoidance of the most sensitive habitat and is consistent with the management objectives of the WCBSP in the absence of a site-specific EMF.

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

To be addressed after PPP1.

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

The Western Cape Biodiversity Spatial Plan Handbook and Guideline (2023) is the provincial document which maps out the Key Biodiversity Areas, including amongst others the Critical Biodiversity Area (CBA1 and CBA2), Ecological Support Areas (ESA1 and ESA2), Other Natural Areas. The subject property is mapped to be situated within the Critical Biodiversity Area (CBA1; terrestrial). The site also contains high abundance of plant species of conservation concern associated with the underlying vegetation type, Agulhas Limestone Fynbos which is listed as Critically Endangered ecosystem type. Agulhas Limestone Fynbos is listed as Critically Endangered in terms of the Revised National List of Ecosystems that are Threatened and in Need of Protection (GN 47526 of 2022).

The site is situated within an area characterised by high abundance of plant species of conservation concern. Moreover, the faunal specialist also highlights that the property is located within a landscape of high

conservation importance. A number of animal species were recorded during the site survey, however, no animal species of conservation concern have been identified by the specialist during the site survey. Moreover, it is noted that the field assessment survey confirmed the site's potential to support several SCC, including Black Harrier, Denham's Bustard (*Neotis denhami*), Southern Black Korhaan (Afrotis afra), Fynbos Buttonquail (*Turnix hottentottus*), Southern Adder (*Bitis armata*), and the Scarce Mountain Copper butterfly (*Trimenia malagrida maryae*).

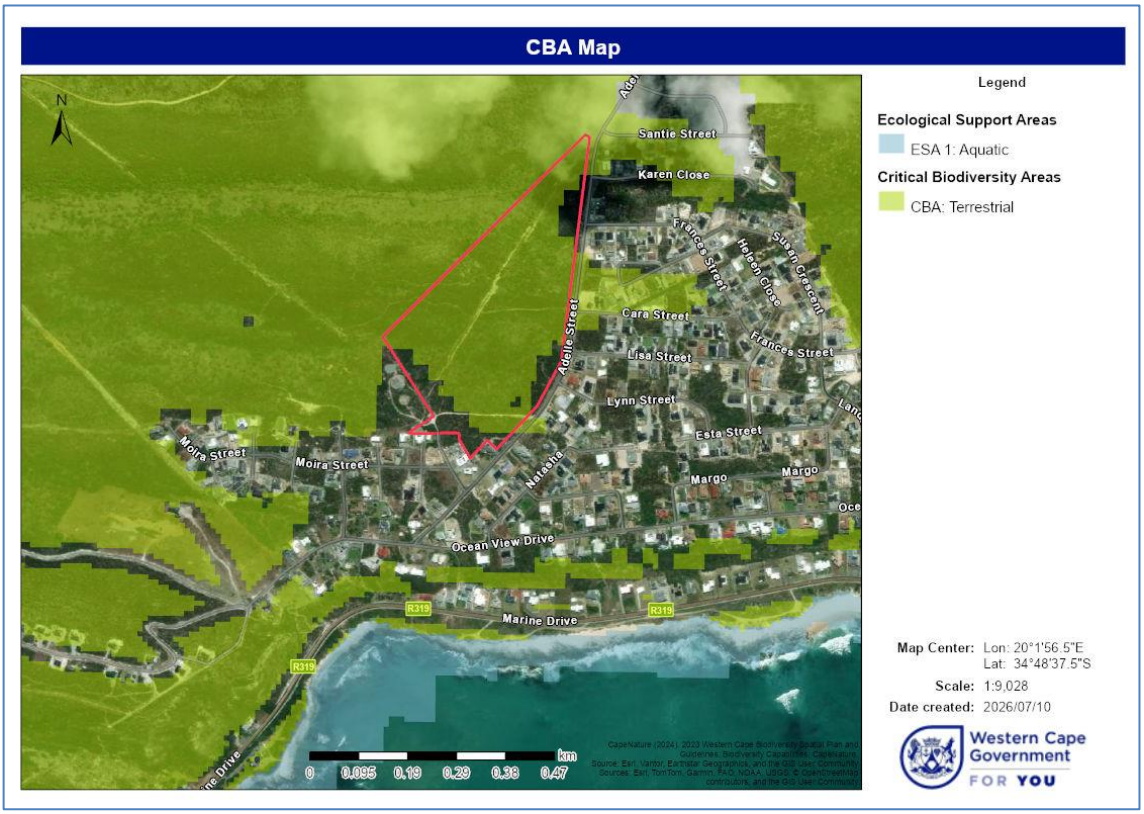


Figure 3: Critical Biodiversity Area (CBA1; terrestrial) mapping, WCBSP (2023).

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

N/A. The development is not located within a coastal environment.

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

The animal species, plant species, terrestrial biodiversity and agriculture theme ratings are unchanged from those reported in the earlier versions of the specialist assessments.

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

The proposed residential development on Erf 3495, Struisbaai directly aligns with sustainable spatial planning principles by optimising unutilised vacant land situated within the established urban edge of Struisbaai, as designated in the Cape Agulhas Municipality Spatial Development Framework (2022–2027). The subject property is approximately 12.22-hectare in extent and represents a logical opportunity for infill development, as it directly adjoins existing residential erven within its vicinity, including existing erven to the south and east. By directing growth to underutilised parcels of land inside the defined urban boundary, the development actively counteracts urban sprawl, protecting outlying rural landscapes and natural greenfields from unnecessary peripheral expansion.

The selection of Erf 3495 for urban optimisation is further supported by its verified low agricultural potential and lack of crop production viability. Specialist agricultural studies confirm that the land is constrained by shallow, highly sandy soils on underlying hardpan carbonate, steep dune slopes, and an arid climate, rendering it unsuited for viable rain-fed agriculture. Because the property has never been used for agricultural production and remains isolated from surrounding agricultural activities, converting this vacant, agriculturally zoned land into structured housing results in a negligible loss of agricultural capability. This ensures that vacant land within the town's perimeter is unlocked without encroaching upon prime arable land elsewhere in the region.

A major positive impact of developing within the urban edge is the direct integration into existing municipal service infrastructure networks. Because Erf 3495 is bordered by existing municipal road reserves such as Adelle Street and Noreen Street the site can connect directly to the surrounding civil engineering infrastructure, including bulk water distribution, sewer mains, stormwater systems, and electrical networks. Utilising established bulk infrastructure avoided the substantial capital expenditure and environmental disruption associated with extending long service corridors to isolated rural locations, thereby optimising municipal utility operations and improving long-term service delivery efficiency.

Furthermore, the preferred spatial site development plan (Alternative 2) demonstrates a highly efficient, context-sensitive optimisation of the 12.22-hectare site. The layout efficiently clusters 72 single residential erven across 6.38 hectares (52.6% of the property) on the southern and central portions of the land. Concurrently, it reserves 3.96 ha (32.7% of the total area) as a dedicated Private Open Space / Nature Conservation Area on the steep north-facing slope (Erf 80), alongside integrated private open space corridors and municipal servitudes. This balanced planning approach transforms a previously vacant parcel into an active, servicing-efficient urban neighbourhood while permanently safeguarding local fynbos biodiversity, water pipeline servitudes, and visual corridors.

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

The proposed residential housing development on Erf 3495, Struisbaai has been planned to optimise the utilisation of existing municipal infrastructure and local natural resources, minimising unnecessary capital expenditure and reducing operational pressures on municipal service networks.

Proximity and Integration with Municipal Civil Infrastructure

The property is situated directly within the designated urban edge of Struisbaai, bordered by existing residential developments along Adelle Street and Noreen Street. This location within the urban edge allows the development to connect directly into surrounding civil utility networks, including existing bulk water distribution, municipal sewerage networks, electrical supply grids, and established road corridors. Capitalising on adjacent municipal infrastructure avoids the costly extensions and environmental impacts associated with building new, isolated service lines across rural land. Each residential erf will connect directly to the municipal electrical network equipped with individual prepaid meters, encouraging responsible energy consumption and active demand management by residents.

Strategic Preservation and Utilisation of Existing Infrastructure Servitudes

The site development layout (Alternative 2) directly respects and incorporates existing municipal infrastructure assets present on the property. Two 10-meter-wide municipal water pipeline servitudes currently traverse Erf 3495, conveying bulk water supply mains. Rather than creating spatial conflicts or necessitating expensive pipeline diversions, the preferred layout places these servitudes entirely within designated Private Open Space green corridors (Erven 73–77) and the Nature Conservation Area (Erf 80). This design permanently safeguards the municipal water mains from structural encroachment while maintaining unobstructed maintenance access for municipal engineering teams.

Demand-Side Water Management and Resource Efficiency

To alleviate pressure on the local municipal water supply, the development incorporates strict on-site water conservation measures. Every homeowner is required to install a minimum 5,000-litre rainwater storage tank connected to roof catchments to supply water for garden irrigation and toilet flushing. All residences must be fitted with low-flow showerheads, tap aerators/flow restrictors, and dual-flush toilets, with greywater recycling systems actively encouraged. High-water-demand lawns are capped at a maximum of 30% of individual garden areas, and landscaping must be restricted to a drought-tolerant, locally indigenous coastal fynbos plant palette. In this regard, the VIA requires the current Master Landscape Plan palette to be revised to remove non-indigenous, riverine and forest species and to limit lawn.

Renewable Energy Integration and Passive Climate Design

The architectural guidelines establish clear criteria to optimise energy efficiency across the built footprint. The design standards promote the installation of flush-mounted rooftop solar Photovoltaic (PV) systems and split solar water heating systems to reduce reliance on the municipal grid. Houses are restricted to narrow, simple rectangular plan forms (maximum width of 6.5 meters) with shaded verandahs and pergolas, maximising natural cross-ventilation, daylighting, and thermal efficiency while complying strictly with SANS 10400-XA energy standards.

Compact Land Optimisation and Resource Protection

By utilising land verified as having low agricultural capability due to shallow, sandy soils over hardpan carbonate and steep dune topography the development unlocks unutilised urban land without compromising prime arable soils. Alternative 2 optimises the 12.22-hectare site by clustering 72 single residential erven over 52.6% of the property, leaving 32.7% (3.96 ha) as a dedicated Nature Conservation Area (Erf 80) alongside 5.1% in Private Open Space. This compact layout balances efficient infrastructure delivery with long-term ecological preservation.

The proposed development will make efficient use of the existing road network. The site lies within the urban edge of Struisbaai and adjoins Adelle Street, an existing Class 4 local distributor that links to Main Road (MR261) by way of the Main Road, Industria Road and Argonauta Avenue intersection. The Transport Impact Assessment confirms that this intersection and the new site access will operate at acceptable levels of service under the 2031 total traffic scenario. No upgrades to the external road network are required. The development will therefore be served by existing public road infrastructure, and no new external roads will be constructed. Public transport is available along Main Road, within reach of the site.

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

The Cape Agulhas Local Municipality confirmed in writing (letter dated 3 October 2025) that municipal water and sewerage services are available in the vicinity and that the municipality has sufficient, unallocated capacity to support the proposed 72-erf residential development on Erf 3495. In addition, the developer will pay standard municipal bulk contribution levies and connection fees per unit to contribute toward bulk infrastructure networks.

Water supply services

An existing 160 mm Ø municipal watermain is located directly adjacent to the property along the western boundary of Adelle Street (which tees off from an existing 200 mm Ø bulk supply main). Ground levels on the property sit below the local municipal reservoirs, ensuring natural gravity water pressure without requiring booster pumps. The municipality confirmed capacity to satisfy the development's projected Annual Average

Daily Demand (AADD of 0.7396 ℓ/s), Peak Domestic Flow (2.9584 ℓ/s), and Firefighting Supply (15 ℓ/s at 15 m residual head) via a bulk meter connection on Adelle Street.

Sewage

An existing 160 mm Ø municipal gravity sewer main is available at the intersection of Adelle Street and Santie Street. The municipality confirmed capacity for the site's wastewater output calculated at a Daily Dry Weather Flow (DDWF of 0.5177 ℓ/s) and an Instantaneous Peak Wet Weather Flow (IPWWF of 1.5531 ℓ/s) which will drain by gravity into the Ocean View Heights pump station at Peggy Close without requiring any internal pumping stations.

Electricity

Electrical engineering report confirm that electrical supply will be provided by the Cape Agulhas Local Municipality. Each erf will connect underground to the adjacent municipal power network on Adelle Street and will be fitted with an individual municipal prepaid meter.

Solid Waste Management

Household refuse will be collected and disposed of by the Cape Agulhas Municipality. Municipal refuse trucks will access the site via the internal 13-metre road reserves.

Stormwater Drainage

Stormwater will be attenuated on-site and safely discharged into the existing municipal stormwater channels along Adelle Street via an engineered silt, debris, and energy dissipation trap.

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.

The need for and desirability of a proposed activity is a mandatory consideration in the decision-making process for an application for Environmental Authorisation. Section 24O(1)(b) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), read with Regulation 18 of the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), requires the competent authority to take into account all relevant factors, including the need for and desirability of the activity. Appendix 1, Section 3(1)(f) of the EIA Regulations, 2014 further requires that a Basic Assessment Report (BAR) contain a motivation for the need and desirability of the proposed development, including the need and desirability of the activity in the context of the preferred location.

This section has been compiled with reference to the Department of Environmental Affairs and Development Planning (DEA&DP) Guideline on Need and Desirability and the national Integrated Environmental Management Guideline on Need and Desirability (Department of Environmental Affairs, 2017).

In terms of these guidelines, need and desirability is not assessed as a stand-alone justification, but as an integrated test of whether the proposed activity is ecologically sustainable and socially and economically justifiable, consistent with the National Environmental Management Principles contained in Section 2 of NEMA.

For the purposes of this assessment:

- Need relates to the timing of the proposed activity and whether it responds to a demonstrated societal requirement, as expressed in the applicable strategic planning instruments and the availability of supporting infrastructure.

- Desirability relates to the appropriateness of the proposed activity at the specific location, having regard to the biophysical sensitivity of the site, the surrounding land uses, and the sense of place of the receiving environment.

The assessment draws on the findings of the specialist studies undertaken for the application, the Department of Forestry, Fisheries and the Environment (DFFE) National Web-based Environmental Screening Tool report, the applicable provincial and municipal spatial planning frameworks, and the engineering services information supplied by the Applicant.

Site Context and Baseline Conditions Considered

Erf 3495, Struisbaai, is a vacant, undeveloped property of approximately 12.22 ha located on the western side of Adelle Street, within the Cape Agulhas Local Municipality. The property adjoins established residential neighbourhoods, including Ocean View Heights, and is bordered by existing urban development and municipal road reserves.

The land falls from approximately 65 m above mean sea level at the municipal reservoirs in the south to approximately 30 m at the northern apex of the property. A broad crest runs east to west through the central erven, and the northern portion of the property (Erf 80) is a steep north-facing slope. The soils are shallow and sandy, overlying a calcrete hardpan, and the property has not been cultivated or used for commercial agriculture. Existing municipal water pipeline servitudes traverse the property.

The natural vegetation on the property comprises Agulhas Limestone Fynbos, which covers the entire property. The ecological condition, conservation status and spatial biodiversity designation of the property are described below.

NEED

Strategic Planning Alignment and Timing

Consistency with spatial planning instruments

The proposed development is consistent with the spatial planning principles of the Spatial Planning and Land Use Management Act, 2013 (Act No. 16 of 2013) (SPLUMA) and the Western Cape Land Use Planning Act, 2014 (Act No. 3 of 2014) (LUPA), in particular the principles of spatial efficiency, spatial sustainability and spatial resilience. The alignment of the proposal with the Western Cape Provincial Spatial Development Framework (PSDF, 2020) is addressed in this BAR.

The Cape Agulhas Municipal Spatial Development Framework (MSDF) promotes compact settlement form, residential infill on vacant land within existing settlements, and the containment of urban growth within the delineated urban edge. Erf 3495 is located inside the urban edge of Struisbaai and is contiguous with existing residential development. The proposal is therefore a greenfield development within the urban edge.

Existing land use rights and concurrent applications

The property is currently zoned Agricultural Zone 1 in terms of the Cape Agulhas Municipality: By-law on Municipal Land Use Planning. The proposed subdivision and rezoning require approval in terms of the By-law, and the land use application is being processed concurrently with this application for Environmental Authorisation. The proposed residential use is compatible with the land uses on the adjoining properties.

Timing and societal need

Struisbaai is identified as a growth node within the Cape Agulhas Municipality and functions as a coastal holiday, residential and retirement settlement. The proposal responds to the demand for serviced single residential erven within the existing settlement. The proposed timing is considered appropriate because:

- the property is located within the urban edge and is earmarked for urban development in the applicable spatial planning framework;
- the Cape Agulhas Local Municipality has confirmed that bulk service capacity is available (Section 4); and
- the development can be accommodated without new external bulk water or sewer infrastructure, subject to the electrical network upgrades identified in the electrical services report (**Appendix G8**).

The proposed development is therefore considered to be needed at this time and in this location.

Bulk Services and Infrastructure Capacity

The Cape Agulhas Local Municipality has confirmed in writing, by letter dated 3 October 2025, that water sources and storage, sewerage purification and electricity are available to serve the proposed 72 single residential erven.

All internal civil services will connect to the existing municipal networks in Adelle Street and Santie Street. No new pump stations or wastewater treatment works are required to serve the development. Electrical network upgrades, including 11 kV cabling, transformers and metering, are required in terms of the electrical services report (Appendix G8). The proposal therefore makes efficient use of existing public infrastructure, in accordance with the NEMA principle that development must be socially, environmentally and economically sustainable.

The existing municipal water pipeline servitudes that traverse the property have been accommodated over private open space Erven 73 to 77 plus Erf 80, which ensures that municipal access to, and the integrity of this infrastructure is retained. No connections to these pipelines servitudes will be required for the proposed development.

The demand placed on municipal water supply will be further reduced by the mandatory rainwater harvesting and water-efficiency measures contained in the Architectural Guidelines.

DESIRABILITY

Suitability of the Site for the proposed activity

Terrestrial biodiversity and vegetation

The natural vegetation of the property comprises Agulhas Limestone Fynbos, which is listed as Critically Endangered (GN 47526 of 2022) in terms of the Revised National List of Ecosystems that are Threatened and in Need of Protection (2022). In terms of the Western Cape Biodiversity Spatial Plan (2023), the property is mapped as a Critical Biodiversity Area (CBA1; terrestrial).

Fauna

The DFFE Screening Tool rates the property as High sensitivity for the Animal Species Theme. The Terrestrial Animal Species Assessment identifies the overall Site Ecological Importance of the property as High. The property provides actual or potentially suitable habitat for several faunal species of conservation concern, including Black Harrier (*Circus maurus*), Denham's Bustard (*Neotis denhami*), Southern Black Korhaan (*Afrotis afra*), Fynbos Buttonquail (*Turnix hottentottus*), Southern Adder (*Bitis armata*) and Scarce Mountain Copper (*Trimenia malagrida maryae*).

The faunal specialist identifies Alternative 2 as the preferred option from a faunal perspective, as it concentrates development in the southern portion of the property and retains Erf 80 as habitat connected to the wider Paapekuilsfontein landscape. The specialist confirms that habitat loss, fragmentation and disturbance cannot be fully eliminated through site-level mitigation, and that the residual impact ratings remain applicable. The recommended mitigation includes long-term conservation management of Erf 80, alien vegetation control and restoration, maintenance of ecological connectivity, appropriate fire management, controls on lighting, noise, vehicles, domestic animals and access to retained natural areas, and monitoring and adaptive management. The Conservation Master Plan is regarded by the faunal specialist as an important additional landscape-scale mitigation measure, with its regulatory treatment to be determined by the competent authority.

Agriculture

The DFFE Screening Tool rates the property as ranging from Low to Medium sensitivity for the Agriculture Theme. The Site Sensitivity Verification and Agricultural Compliance Statement (SoilZA, 30 September 2026) verifies the entire property as being of low agricultural sensitivity, with no potential for viable rainfed crop production. This is attributed to the arid climate (mean annual rainfall of 424 mm), the terrain (hilly ridges of old coastal dunes with slopes of up to 25%) and the soils (predominantly shallow sands on hardpan carbonate, with low water holding capacity). The property and its surrounds have never been used for agricultural production. The specialist concludes that the development will result in a negligible loss of future agricultural production potential and is acceptable.

Heritage, Archaeology and Palaeontology

The Palaeontological Impact Assessment (November 2026) finds that excavations for foundations (approximately 0.6 m deep) and services (up to approximately 1.2 m deep) will affect the capping calcrete and underlying sands of the Waenhuiskrans Formation, which is rated Very High palaeontological sensitivity on SAHRIS. Because the property lies on an elevated ridge crest, where a water source attracting animals is unlikely to have been present, the probability of fossil bones being common is reduced. The impact is rated Medium Negative without mitigation and Medium to High Positive with mitigation. The specialist confirms that the possible presence of fossils does not influence the decision to proceed and recommends that a Fossil Finds Procedure be included in the EMPr and implemented through the ECO during construction. The Heritage Impact Assessment found no graves, structures or sites of historical or social significance on the property, and that the property has no intrinsic historical or architectural significance. It contributes to contextual significance because it retains its open and natural qualities at the current edge of urban development. The HIA recommends that Heritage Western Cape support the development, subject to the finalisation of the Architectural Guidelines and Landscape Master Plan and the completion of the visual simulations.

Sense of place and visual character

The Architectural Guidelines restrict the 45 central ridge-line erven to single storey dwellings with a maximum height of 6.0 m above natural ground level, and permit double storey dwellings of up to 7.5 m on 27 erven along the northern and southern edges. They also prescribe a muted, earthy palette of natural materials, minimal shielded external lighting, and visually open boundary treatments along Erf 80 and private open space. These controls are intended to ensure that the development reads as a low, stepped group of houses set within indigenous planting, consistent with the character of the adjoining residential areas. The Visual Impact Assessment finds that the development will turn a natural, vegetated limestone ridge into a residential area, with the greatest change experienced by adjoining residents. It supports the single storey restriction on the ridge line, but finds that the double storey edge zones are the most exposed edges of the development when seen from outside the estate and must be verified through visual simulations from Viewpoints 1, 2, 6 and 7. With the recommended mitigation, the VIA rates the residual visual impact as Low Adverse during construction and Low to Moderate Negative during operation, and recommends the amended Alternative 2 Preferred Layout (16

November 2026) for approval, subject to the finalisation of the Architectural Guidelines and a further round of assessment once 3D simulations have been prepared. Alternative 1 is not supported.

Socio-economic considerations

The socio-economic need and desirability of the proposal is considered below in the context of the socio-economic profile of the municipal area and the strategic direction set out in the CAM MSDF.

Socio-economic profile

The CAM MSDF, which draws on the 2022 Socio-Economic Profile of the Cape Agulhas Municipality (Western Cape Government), records the following:

- the municipal population was 35 758 in 2022, with an estimated 14 507 workers, of whom 12 163 (83.8%) were employed in the formal sector;
- Cape Agulhas recorded the lowest unemployment rate in the Overberg District in 2021 (12.3%), but unemployment has increased by 6.4% since 2015, and the proportion of the population that is not economically active increased from 2020 to 2021;
- despite economic recovery in 2021, the municipal economy shed an estimated 402 net jobs, including 61 in the construction sector, indicating that employment creation has lagged behind economic recovery; and
- the formally employed workforce is predominantly semi-skilled (45%) and low-skilled (39.5%).

The CAM MSDF further notes that the expansion of coastal settlements, new urban developments and tourism activities contribute to the growth of the construction sector, which is labour-intensive, has significant short-term job creation potential and has backward and forward linkages to locally sourced trades such as electrical fittings, plumbing and painting. In this context, development that generates employment for semi-skilled and low-skilled workers, particularly in the construction sector, is considered to contribute positively to the socio-economic needs of the municipal area.

Employment

The proposed development is expected to generate short-term employment during the construction phase, including the installation of civil engineering services and electrical infrastructure and the subsequent construction of dwellings on the 72 residential erven. As dwellings on serviced erven are typically constructed by individual owners over an extended period, construction-related employment is anticipated to be sustained for several years beyond the initial servicing phase. These opportunities are expected to benefit local contractors, artisans, labourers and building material suppliers in Struisbaai and the broader Cape Agulhas area. In the operational phase, the development is expected to support ongoing employment in domestic work, garden and maintenance services, security services, and the management of the Nature Conservation Area, including alien invasive vegetation clearing and ecological restoration.

Tourism and the local economy

The CAM MSDF identifies Struisbaai as the largest coastal settlement in the municipality and as a sought-after retirement town and holiday destination. It recognises tourism as an economic development tool to combat unemployment, broaden the skills base and alleviate poverty, and notes that the coastal areas of the municipality have particularly high potential for tourism expansion. The provision of additional market-related residential opportunities in Struisbaai is expected to support demand for permanent, retirement and holiday accommodation, which in turn supports the local tertiary economy, including the wholesale and retail trade,

catering and accommodation sectors. The tertiary sector is the largest contributor to employment in the municipal area (71.2% in 2020). An increase in the resident and seasonal population associated with the development is therefore anticipated to have a positive indirect effect on local businesses and service providers.

Municipal finances and infrastructure

The creation of 72 additional rateable residential properties will broaden the municipal rates base and generate ongoing revenue through property rates and service charges, contributing to the financial sustainability of the Cape Agulhas Municipality and its capacity to deliver services to the broader community. The development adjoins existing residential development and is accessed from an existing municipal road (Adelle Street), which allows for the logical extension of existing municipal infrastructure rather than isolated or leapfrog development.

It is noted that the development serves the market-related housing segment and does not address the low-income housing needs identified in the CAM MSDF for Struisbaai, which are to be met through the municipal projects north of the Blompark Precinct and east of Struisbaai North.

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 Public Participation Process 1.

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

DEADP: Land Use

DEADP: Biodiversity Management

National Department of Agriculture

Overberg District Municipality

Cape Agulhas Municipality

CapeNature

South African National Parks (Agulhas National Park)

Heritage Western Cape

Western Cape Department of Infrastructure; Roads

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.

Pending

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 Public Participation Process 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

3.1.	Was a specialist study conducted?	YES	NO x
3.2.	Provide the name and/or company who conducted the specialist study.		
N/A			
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
N/A			
3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.		
N/A			
3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.		
N/A			

4. Biodiversity

4.1.	Were specialist studies conducted?	YES x	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		

Botanical and Terrestrial Biodiversity Impact Assessment

Dr D.J. McDonald – Bergwind Botanical Surveys and Tours CC.

Terrestrial Animal Site Sensitivity Verification and Species Specialist Assessment Report

Jan A Venter & Rudi Swart – Wildlife Conservation Decision Support.

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.

Botanical and Terrestrial Biodiversity Impact Assessment

The botanical specialist used the National Vegetation Map (VEGMAP, 2024) to determine the vegetation type of the property. The Western Cape Biodiversity Spatial Plan (2023), the Red List of Ecosystems remnant layer (SANBI, 2022) and the National Web-based Environmental Screening Tool were also applied, as the specialist protocols require. The Revised National List of Ecosystems that are Threatened and in need of Protection (2022) was used to confirm the conservation status of the underling vegetation type. Google Earth Pro™ historical imagery was also used to describe the disturbance history of the property.

To compile a list of plant species which area likely to occur onsite, the specialist consulted the iNaturalist database and used species data that he collected on 27 October 2022 and in 2023 in the Agulhas Limestone Fynbos immediately west of the erf, including the survey for the proposed "The Ridge" development. Because the vegetation is continuous and of the same type, these surveys help to interpret the vegetation on Erf 3495. The assessment also takes into account the requirements of CapeNature and the Botanical Society of South Africa, the Western Cape guidelines for biodiversity specialists (Brownlie, 2005; Cadman, 2016) and the SANBI Species Environmental Assessment Guideline (2020).

Field surveys

The botanical specialist surveyed Erf 3495 on foot on three occasions, recording waypoints and survey routes with a handheld GPS and GPS-enabled camera. The first survey, on 20 December 2022, followed the tracks cut through the vegetation and recorded the habitat and plant species by photograph. The second survey, on 10 November 2023, focused on recording plants of *Mimetes saxatilis* in the part of the erf planned for development, and on recording other species in flower. The third survey, on 4 October 2026, traversed the southern, western and central parts of the erf during a wider survey of RE/281 (Paapekuilsfontein). Morning waypoints were recorded along the south-western boundary and afternoon waypoints along a north-east to south-west line through the centre of the erf.

The vegetation

The whole of Erf 3495 is mapped as Agulhas Limestone Fynbos, a vegetation type that grows on the lime-rich soils of the Agulhas Plain. A narrow band of strandveld (Overberg Dune Strandveld, now included in Southwestern Strandveld) runs along the coast to the south, outside the erf. Agulhas Limestone Fynbos is very rich in species and contains many endemic plants adapted to lime-rich soils. It is a moderately dense, low shrubland with tall proteas and similar shrubs standing above it, with restio-rich (reed-like) fynbos in sandy areas and on limestone pavements.

On the subject property (Erf 3495) the vegetation is mid-high to tall fynbos dominated by proteas and daisy-family shrubs, with emergent shrubs reaching 1.5 to 2 m. The characteristic proteas are *Protea obtusifolia*, *Leucadendron meridianum* and *Mimetes saxatilis*, three limestone endemics that grow closely together on the erf. Restios are prominent in the lower layer and form dense stands on shallow soil over calcrete, while the sandy pockets support more open, restio-rich vegetation. In early October 2026 the vegetation was in full growth and flower, with conspicuous white-flowered shrubs, buchus (*Agathosma* spp.), everlastings, ericas, lobelias and several bulbs in flower.

The spring survey of 4 October 2026 recorded, among others, *Reseda lutea*, *Agathosma collina* (a dense, white-flowered buchu visited by butterflies), *Wahlenbergia calcarea*, *Lobostemon fruticosus*, *Restio leptoclados*, *Restio eleocharis*, *Cassytha ciliolata*, *Oedera capensis*, *Leucadendron meridianum*, *Achyranthemum paniculatum*, *Ficinia praemorsa* (a limestone endemic on limestone outcrops), *Moraea tripetala*, *Hyobanche sanguinea*, *Chascanum cernuum*, *Erica coccinea*, *Bobartia longicyma*, *Mimetes saxatilis*, *Serruria bolusii* and *Wachendorfia paniculata*. The survey of 10 November 2023 recorded, among others, *Achyranthemum mucronatum*, *Achyranthemum paniculatum*, *Leucospermum truncatum*, *Helichrysum patulum*, *Lachnaea axillaris* (Near Threatened), *Chironia tetragona*, *Aspalathus ciliaris* and *Mimetes saxatilis*. Other species photographed on the erf include *Indigofera pillansii*, *Erica plukenetii*, *Erica viscaria* subsp. *longifolia*, *Agathosma imbricata*, *Phylica pubescens* subsp. *orientalis*, *Leucospermum patersonii*, *Protea obtusifolia*, *Gladiolus miniatus*, *Gladiolus variegatus* and *Gladiolus rogersii*. The specialist's list of species likely to occur on the erf, drawn from iNaturalist and the surveys to the west, contains more than 100 indigenous species and is given in full in Section 7.5 of Annexure D of the Botanical and Terrestrial Biodiversity Impact Assessment.

The specialist describes the vegetation as being in fair to good condition. The main negative influences are invasive Australian acacias, especially rooikrans, the tracks and the branches left by woodcutters. The fynbos is mature and in places senescent, with a high proportion of dead shrubs, which shows that it has not burnt for a long time. From the spring survey, the specialist concludes that the Agulhas Limestone Fynbos on Erf 3495 is intact over most of the erf, rich in species and typical in structure, with limestone pavement and outcrop habitat in the central and southern parts.

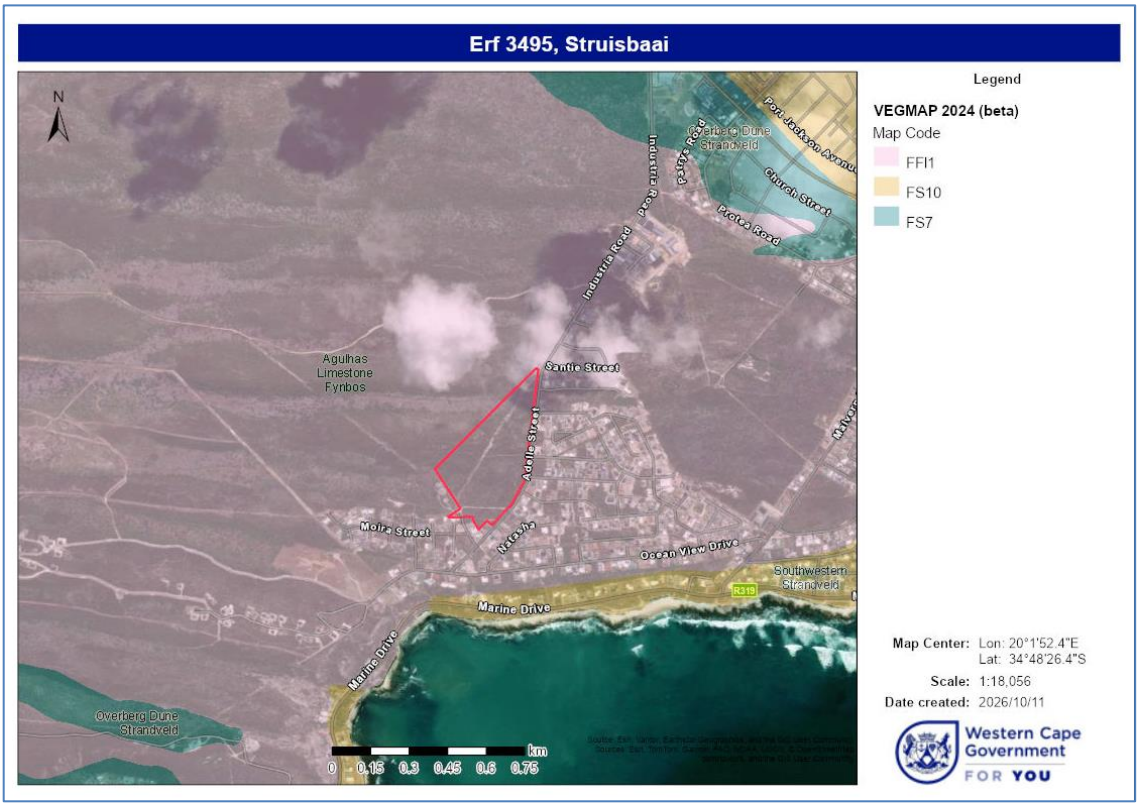


Figure 4: Agulhas Limestone Fynbos vegetation (Critically Endangered).



Photo 1: View of the vegetation on the southern boundary of Erf 3495.



Photo 2: Limestone outcrop with tufted restios and the limestone endemic *Ficinia praemorsa*. Rocky limestone habitat of this kind supports many of the limestone endemics. ***Source:*** McDonald (2026).



Photo 3: Mature, species-rich limestone fynbos with restios below and proteas above.

Plants Species of Conservation Concern

The botanist recorded a total of eight plant species of conservation concern and limestone endemics on Erf 3495, as inserted in the table below. The botanist also considers it likely that more plants species of conservation concern occur on the erf, because a complete list would require fieldwork in different seasons over several years.

Table 3: Plants species of conservation concern recorded onsite.

Species	Red list Status	Specialist notes
Mimetes saxatilis	Endangered (EN)	Limestone endemic at its eastern distribution limit at Struisbaai. Recorded in 2022, 2023 and 2026 in the central and eastern parts of the erf, within the development footprint of both alternatives. Population not counted. Screening Tool: High.
Leucospermum patersonii	Vulnerable (VU)	Limestone endemic. Screening Tool: Medium.
Gladiolus miniatus	Vulnerable (VU)	Endemic bulb
Gladiolus variegatus	Vulnerable (VU)	Endemic bulb
Leucadendron meridianum	Near Threatened (NT)	Limestone endemic, widespread on the erf.
Leucadendron muirii	Near Threatened (NT)	Limestone endemic

Protea obtusifolia	Near Threatened (NT)	Limestone endemic, closely associated with *M. saxatilis* and *L. meridianum* on the erf.
Leucospermum truncatum	Near Threatened (NT)	Limestone endemic

Mimetes saxatilis is of particular importance. It is an Endangered limestone endemic that reaches the eastern limit of its distribution at Struisbaai. On 10 November 2023, a botanical survey recorded ten individual plants in the portions of the subject property, including the central (approximately S 34°48'29"–30", E 20°01'59"–20°02'04") and in the eastern parts of the subject property. Further plants were noted in October 2026. The specialist found that plants on the development footprint would be lost together with their habitat, and that they cannot be relocated in a search-and-rescue exercise because they do not transplant successfully. Like most proteas of limestone fynbos, the species grows back only from seed after fire, and its seeds are dispersed by ants. Its survival on the erf therefore depends on the limestone habitat, the ant community and an appropriate fire regime all remaining intact.



Photo 4: Upright leafy stems of *Mimetes saxatilis* (Endangered). ***Source:*** McDonald (2026).



Photo 5: *Leucospermum patersonii* (Vulnerable). Source: McDonald (2026).



Photo 6: *Protea obtusifolia* (Near Threatened), a limestone endemic. Source: McDonald (2026).



Photo 7: *Leucospermum truncatum* (Near Threatened), a pincushion of limestone fynbos. Source: McDonald (2026).



Photo 8. *Gladiolus miniatus* (Vulnerable). Source: McDonald (2026).



Photo 9. *Gladiolus variegatus* (Vulnerable). Source: McDonald (2026).

Ecological processes and connectivity

The botanical specialist identifies fire as the main ecological driver of Agulhas Limestone Fynbos. Many of its species, including the proteas, depend on fire to grow back from seed, and without fire for a long period the vegetation becomes senescent and loses species. The fynbos on Erf 3495 is mature and in places senescent. The cut *Acacia* material on the site adds to the fuel load and to the risk of an unnaturally hot fire. The specialist notes that once houses are built next to the retained vegetation, prescribed burning becomes difficult, and fire is likely to be excluded from small conservation areas surrounded by development.

Pollination and seed dispersal are the other key processes. The proteas are pollinated by birds and insects, and the seeds of many limestone fynbos species, including *Mimetes saxatilis* and the buchus, are dispersed by ants. The indigenous ant community is vulnerable to invasion by the alien Argentine ant (*Linepithema humile*), which is commonly associated with urban development and does not disperse fynbos seeds. The specialist identifies this as an indirect threat to the retained vegetation once the development is occupied.

Erf 3495 lies at the eastern end of a continuous tract of Agulhas Limestone Fynbos that extends westwards across RE/281 towards Agulhas National Park. It is bounded by urban development to the east and south, and its northern and western parts adjoin the natural habitat on RE/281. The specialist found that the erf's contribution to landscape connectivity depends on this contact with RE/281: habitat kept along the western and northern boundaries maintains the connection, whereas habitat kept as isolated patches within the development would not.

Animals observed during the botanical survey

The botanical specialist observed animals, birds and insects during his botanical survey. On 4 October 2026 a copper butterfly, *Chrysoritis thysbe* subsp. *thysbe*, was photographed feeding on the white-flowered buchu *Agathosma collina* in the south-western part of the erf. Another copper, *Chrysoritis zeuxo*, and the protea scarlet butterfly *Capys alpheus*, photographed on *Leucospermum truncatum*, were also recorded. These butterflies depend on ants to complete their larval development. The specialist found that their presence shows the limestone fynbos on the erf provides habitat for butterflies that rely on the ant–plant associations described above.

He also notes that the Endangered scarce mountain copper (*Trimenia malagrida maryae*), a butterfly of rocky limestone ridges with short fynbos, is known historically from Struisbaai, although it has not been recorded there for at least ten years.

The bird life is typical of coastal shrubland in the Western Cape. The birds recorded included Karoo prinia, southern boubou, red-faced mousebird, bar-throated apalis, southern double-collared sunbird and yellow bishop; Cape spurfowl was also seen.



Photo 10: The copper butterfly *Chrysoritis thysbe* subsp. *thysbe* feeding on *Agathosma collina*. Source: McDonald (2026).



Photo 11: *Chrysoritis zeuxo*, a copper butterfly whose larvae are associated with ants. Source: McDonald (2026).



Photo 12: The protea scarlet butterfly *Capys alpheus*. ***Source:*** McDonald (2026).

Conservation status and site sensitivity

The vegetation mapped for the subject property is Agulhas Limestone Fynbos, which is classified as a Critically Endangered (CR) ecosystem in terms of the Revised National List of Ecosystems that are Threatened and in Need of Protection (2022). With the exception of the disturbed area located in the southwestern portion of the property, specifically around the existing reservoirs, the remainder of the property is mapped as Agulhas Limestone Fynbos. The Western Cape Biodiversity Spatial Plan (2024) classifies almost the entire property as a Critical Biodiversity Area (CBA1); terrestrial) with a small area situated on the southwest of the property and remains unclassified.

The Screening Tool Report identifies the Plant Species Theme as having High sensitivity, while the Terrestrial Biodiversity Theme is rated as Very High sensitivity. These sensitivity ratings are further supported by the specialist's site assessment, which confirmed the presence of a number of plants species of conservation concern as well as a fair to good state of vegetation on the subject property. This is further supported by the confirmed presence of *Mimetes saxatilis* (Endangered) and *Leucospermum patersonii* (Vulnerable) verifies the High plant species sensitivity. The Critically Endangered status of the vegetation, its intact condition, the CBA1 classification and its contact with natural habitat on RE/281 verify the Very High terrestrial biodiversity sensitivity.

The tracks, the pipeline servitude and the disturbed area near the reservoirs are of lower sensitivity, but they are small and do not change the overall rating. Several Medium-sensitivity species listed by the Screening Tool, such as *Leucadendron linifolium* and *Leucadendron laxum*, grow in seasonally wet sandy flats that do not occur on the erf and are unlikely to be present. Other plants species, such as *Leucospermum heterophyllum*, *Aspalathus prostrata* and *Lampranthus ceriseus*, could occur on the limestone but were not recorded, however, the specialist flags these as unrecorded rather than absent.

The specialist, therefore, concludes that Erf 3495 supports intact, Agulhas Limestone Fynbos in a CBA1, with a population of the Endangered *Mimetes saxatilis* near the limit of its range. The whole erf is of High to Very High sensitivity, and the presence of alien vegetation does not make it any less sensitive.

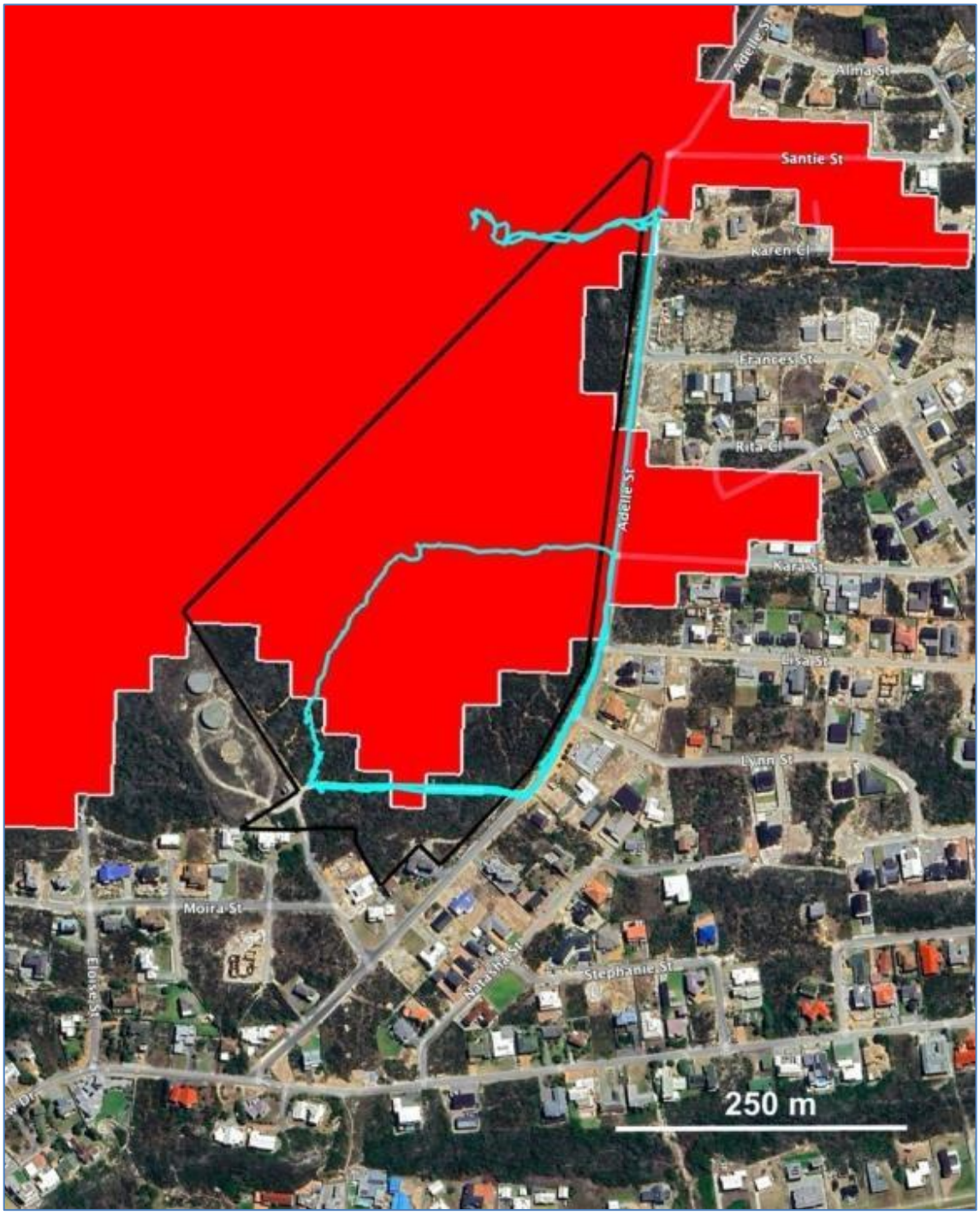


Figure 5: Red List of Ecosystems remnants at Struisbaai. Red shows Critically Endangered Agulhas Limestone Fynbos; Erf 3495 is outlined in black. ***Source:*** McDonald (2026).

Impacts identified by the botanical specialist

The specialist assessed four impacts, separately for the construction and operational phases. A decommissioning phase was not assessed, because the residential development would be permanent.

The first impact is the direct loss of Agulhas Limestone Fynbos and CBA1 habitat during construction. Building the erven, streets and services would permanently remove all the fynbos on the development footprint. Under both alternatives this impact is High Negative before mitigation. After mitigation it remains High Negative for Alternative 1, because the 2.06 ha retained is a narrow band enclosed by erven and mitigation on site is inadequate. For Alternative 2 it is reduced to Medium Negative, because the 3.96 ha retained is a single block joined to RE/281.

Under the No-Go alternative there is no direct loss, but the fynbos would slowly decline through alien invasion and woodcutting (Low Negative).

The second impact is the loss of plant species of conservation concern. Plants of *Mimetes saxatilis* (Endangered), *Leucospermum patersonii* (Vulnerable) and other limestone endemics on the development footprint would be lost. Because *M. saxatilis* cannot be transplanted, search and rescue are not a mitigation measure for this species. The impact is High Negative before mitigation under both alternatives and remains High Negative for Alternative 1. For Alternative 2 it is reduced to Medium Negative, provided that a census of *M. saxatilis* is done before construction and the layout is refined to keep the densest stands where feasible. Under the No-Go alternative, the proteas may decline in the absence of fire (Low Negative).

The third impact, during the operational phase, is fragmentation, edge effects and the disruption of ecological processes. The retained habitat would be affected by edge effects, the exclusion of fire, trampling, dumping, pets and the spread of the Argentine ant. Under Alternative 1, the Nature Conservation Area is a narrow band enclosed by erven that is unlikely to remain functional; the impact is High Negative, reduced to Medium Negative with mitigation. Under Alternative 2, the Nature Conservation Area has only one developed edge and stays connected with RE/281; the impact is Medium Negative, reduced to Low Negative if Erf 80 is managed together with the adjoining conservation area on RE/281.

The fourth impact, also operational, is the spread of alien invasive plants, including garden escapes. It is Medium Negative under all three alternatives. With an alien clearing programme as a condition of the development, it falls to Low Negative for both layout alternatives and could become Low Positive within Erf 80 if clearing is sustained. Under the No-Go alternative there is no responsible party to clear aliens, so the impact remains Medium Negative. The specialist also identifies indirect impacts, including a greater risk of Argentine ant invasion, which disrupts seed dispersal by ants, the exclusion of fire from the retained habitat, and more people entering the retained habitat and RE/281 (trampling, dumping and informal paths).

Terrestrial Animal Species Specialist Assessment

Biodiversity informants and methods

The DFFE Screening Tool rated the Animal Species Theme for Erf 3495 as High. A Terrestrial Animal Species Specialist Assessment was prepared. The faunal specialists considered the eight animal species of conservation concern listed by the Screening Tool, as well as any other faunal species or ecological processes they considered relevant from site conditions, available biodiversity information and specialist judgement.

The desktop study used iNaturalist and Global Biodiversity Information Facility (GBIF) records, together with reports, field guides and scientific literature, to determine which species have been recorded in the area and which species of conservation concern may be present. The Western Cape Biodiversity Spatial Plan (CapeNature, 2023) and the botanical assessment of the erf (McDonald, 2024) were also used. The site survey was undertaken on 2 August 2025, in mild conditions that the specialists describe as good for detecting the target species. Four skilled observers searched the site on foot, and two of them carried out 10-minute point surveys within the development site and its surroundings. Animals, and signs of their presence such as calls, tracks and droppings, were recorded and photographed at seven locations across the erf.

The site visit set out to confirm whether any of the listed species were present in the development area and whether any species of conservation concern not flagged by the Screening Tool are present. The specialists note that the absence of a species during a field survey does not necessarily mean that it does not occur there, and that weather and other conditions can affect what is found.

The Site Ecological Importance (SEI) of each species and process was evaluated following the SANBI Species Environmental Assessment Guideline. SEI combines conservation importance (how important the site is for

threatened species and ecosystems), functional integrity (the condition and connectedness of the habitat) and receptor resilience (how well a species or habitat can withstand or recover from disturbance). The Project Area of Influence was set at 300 m around the development footprint for birds, including raptors, and 100 m for small mammals, reptiles, amphibians and insects, covering the whole property and beyond.

Since the original assessment, the faunal specialists have carried out a broader investigation across the wider Paapekuilsfontein property, with additional field surveys undertaken for the assessment of faunal habitat sensitivity, ecological processes and landscape connectivity. This provides the landscape-scale context for considering the cumulative effects of developing Erf 3495. The change of the proposal to an access-controlled private estate also required the specialists to consider the effect of perimeter security fencing on animal movement.

Faunal habitats

The faunal specialists confirmed that the vegetation on Erf 3495 is Critically Endangered Agulhas Limestone Fynbos. The site is moderately transformed in places by the existing pipeline, jeep tracks and invasive alien vegetation, mainly rooikrans (*Acacia cyclops*) and, to a lesser extent, Port Jackson willow (*Acacia saligna*), which are present throughout the site but are denser and taller in the north. Despite this, substantial areas of natural and semi-natural limestone fynbos remain.

The faunal specialists mapped three broad faunal habitats on the subject property. This includes the bottomland habitat covering part of the northern section of the property with its soils which are highlighted to be deeper and sandier, with fewer rock slabs, and it is dominated by tall, dense stands of rooikrans. The sloped habitat is considered to be rocky and dominated by restios, conebushes (*Leucadendron*) and less dense alien vegetation, with patches of rooikrans. Whereas the flatland habitat is described to be dominated by limestone rock slabs with a mix of restios, proteas and conebushes, alien vegetation, and the area is crossed by a few jeep tracks.

Animals recorded on the site

The faunal specialists recorded the following animals during the site visit. The mammals were Cape grysbok and Cape golden mole. The reptiles were angulate tortoise, ocellated gecko and marbled leaf-toed gecko. Twenty bird species were recorded: bar-throated apalis, Cape bulbul, Cape spurfowl, Cape sugarbird, Cape weaver, Cape white-eye, Cape robin-chat, fiscal flycatcher, greater double-collared sunbird, Karoo prinia, large-billed lark, laughing dove, orange-breasted sunbird, ring-necked dove, red-faced mousebird, southern double-collared sunbird, white-throated canary, yellow bishop, yellow canary and common starling; fiery-necked nightjar had been recorded earlier by McDonald (2024). The invertebrates were pine emperor moth, equine maiden moth, small pugnacious ant (*Anoplolepis steingroeveri*), sugar ant (*Camponotus sp*.), tenspot ground beetle, Cape zebra cockroach, Rûens velvet worm, rain spider, striped lesser thicktail scorpion and drab thicktail scorpion; the fynbos protea scarlet butterfly had been recorded earlier by McDonald (2024). No animal species of potential concern other than the eight listed by the Screening Tool was identified as likely to be present.

Animal species of conservation concern

The Screening Tool listed eight animal species of conservation concern for Erf 3495. None of them was observed during the August 2025 site visit. The faunal specialists' findings on each species are set out below.

Black harrier (*Circus maurus*)

The specialists found Erf 3495 to be highly suitable foraging habitat and suitable breeding habitat and assessed the likelihood of the species occurring in the Struisbaai area as high, especially during the breeding season (July to November) and post-breeding dispersal (December to February). Based on the habitat suitability and likelihood of occurrence, the Site Ecological Importance (SEI) for this species was rated as High.

Denham's bustard *(Neotis denhami)*

The specialist assessment indicates that much of the natural vegetation surrounding Struisbaai has remained unburnt for an extended period, rendering the current habitat moderately unsuitable for Denham's Bustard, which favours more open vegetation associated with recently burnt veld. However, following a fire, the resulting younger and more open vegetation would provide highly suitable foraging habitat and potentially suitable breeding habitat for the species. The Site Ecological Importance (SEI) for this species was rated as Medium.

Southern black korhaan *(Afrotis afra)*

The specialist assessment indicates that the vegetation surrounding Erf 3495 has remained unburnt for an extended period and is currently tall and dense, rendering it moderately unsuitable for the species. However, the habitat is expected to become more suitable following a fire, when vegetation becomes shorter and more open. The likelihood of the species occurring in the Struisbaai area was assessed as moderate to high. The Site Ecological Importance (SEI) for this species was rated as Medium.

African marsh harrier (*Circus ranivorus*)

The African Marsh Harrier is closely associated with wetland habitats, including marshes, vleis and reedbeds, which provide suitable breeding and foraging grounds. As Erf 3495 does not contain significant wetland habitat, the specialist assessment determined that the site is unsuitable for this species. Consequently, the likelihood of the species regularly occurring or breeding within the proposed development area was assessed as very low. The Site Ecological Importance (SEI) for this species was rated as Very Low.

Fynbos buttonquail (*Turnix hottentottus*)

Much of the vegetation surrounding Struisbaai is currently old and dense, rendering the habitat moderately unsuitable for the species. Accordingly, the likelihood of its occurrence in the development area is considered low to moderate under current conditions. However, habitat suitability and the likelihood of occurrence could increase substantially during the two to five years following a fire. The Site Ecological Importance (SEI) for this species was rated as Medium.

Southern adder (*Bitis armata*)

This small, well-camouflaged viper has a small, patchy range along the south-western coast of the Western Cape, made up of a northern subpopulation, a south-eastern subpopulation from Hermanus to De Hoop, and a third subpopulation in the Cape Town area that is now locally extinct. It lives in coastal lowland fynbos on sandy and rocky ground, sheltering under rock slabs between dense shrubs. Its threats include urban development, invasive alien trees, off-road vehicles, persecution and illegal collection for the pet trade. Published photographs and several research-grade iNaturalist records confirm its presence in Struisbaai. Furthermore, suitable habitat is present on Erf 3495. Based on the available distribution records and habitat suitability, the specialist assessment rated the likelihood of the species occurring on the property as high. The Site Ecological Importance (SEI) for this species was rated as High.

Scarce mountain copper (*Trimenia malagrida maryae*)

This butterfly has been recorded at only three locations, namely, Struisbaai, De Hoop and Vermaaklikheid. It has not been recorded at Struisbaai or De Hoop for at least 10 to 15 years and was last seen in about 2013. It prefers rocky limestone ridges with short fynbos at low altitudes, and adults have been noted to be common from January to March. Its larvae are tended by pugnacious ants, and the species appears to be associated with buchu-type plants (*Diosma*, *Agathosma* and *Euchaetis*), probably because those ants carry buchu seeds into their nests.

Occasional fires that benefit the buchus and ants may help the butterfly. The specialist assessment confirmed that all three buchu genera have been recorded on Erf 3495, while two species of pugnacious ants (*Anoplolepis*) have been recorded in close proximity to the property. Although the Scarce Mountain Copper was not observed during the August 2025 site visit, the presence of its associated host plants and ant species indicates that it could potentially occur on the property. The specialists therefore recommend a follow-up site visit between January and March, when adult butterflies are active, to confirm the species' presence or absence. The Site Ecological Importance (SEI) for this species was rated as High.

Yellow-winged agile grasshopper (*Aneuryphymus montanus*)

Considering the property's low elevation, the absence of known species records in the surrounding area, the lack of available host-plant information, the gently sloping sandy dune landscape and the absence of any evidence of the species occurring on the property, the species is unlikely to be present within the development area. Accordingly, the potential impact of the proposed development on this species was assessed as Very Low, with the Site Ecological Importance (SEI) also rated as Very Low.

Landscape connectivity and overall Site Ecological Importance

The faunal specialists found that Erf 3495 lies within an ecologically important part of the Cape Floristic Region that extends westwards towards Agulhas National Park, and that the wider Paapekuilsfontein property, including Erf 3495, is mapped as CBA1. Their broader investigation of the Paapekuilsfontein property confirmed that connectivity is an important ecological function across the wider landholding. Connected natural habitat allows mobile animals to move, disperse and reach resources, while continuity between habitat patches matters for smaller, less mobile species, which depend on it for dispersal, recolonisation and the survival of local populations. The specialists rated the conservation importance of faunal landscape connectivity as Very High, because the erf lies within Agulhas Limestone Fynbos next to strandveld, both of which are key to regional ecological networks. They rated its functional integrity as high, substantial natural habitat on Erf 3495 remains connected to larger natural areas across Paapekuilsfontein and towards Agulhas National Park, although existing development, roads, alien vegetation and infrastructure create local constraints. Resilience was rated Medium, because raptors, bustards and korhaans can cross fragmented farmland, whereas small, ground-bound endemics such as the fynbos buttonquail, southern adder and scarce mountain copper cannot easily do so. On this basis, the SEI of faunal landscape connectivity for the project site is High. Taking all the species and processes together, the faunal specialists assessed the overall Site Ecological Importance of the faunal habitats and ecological processes within the Project Area of Influence as High.

Conservation Master Plan

The faunal specialists record that a Conservation Master Plan has been developed for the wider Paapekuilsfontein property (Farm 281). It identifies substantial areas for conservation and seeks to keep a connected network of natural habitat, while concentrating development in defined parts of the landholding. Alternative 2 (preferred) retains approximately 3.96 ha (32.7% of the layout) area on Erf 3495 which is designated as a Nature Conservation Area, Private Open Space. The specialists treat this separately from the smaller private open spaces within the residential layout, which they do not regard as equivalent to the natural habitat retained in Erf 80. The landowner has indicated that Erf 80 will be managed as natural habitat and included in the wider conservation network, with invasive alien plants cleared and the area restored with indigenous vegetation.

The specialists consider the broader conservation framework to be an important landscape-scale part of the mitigation for Alternative 2. Its main ecological benefits are the retention and management of natural habitat, the maintenance of landscape connectivity, coordinated alien clearing and restoration, and conservation planning at a scale relevant to mobile and habitat-dependent animals. The framework allows cumulative fragmentation and connectivity effects to be addressed at a scale that cannot be achieved within Erf 3495 alone. However, it does not change the site-level SEI ratings or impact ratings, and its long-term benefit depends on the conservation areas

being properly managed and secured. Whether any additional conservation mechanism is required is for the competent authority to decide, informed by the relevant conservation authorities.

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.

Both specialists relied on the Western Cape Biodiversity Spatial Plan (WCBSP, 2023) as a key reference in their assessments. The botanical specialist overlaid the WCBSP mapping for the Cape Agulhas Municipality onto satellite imagery of the property. The assessment confirmed that almost the entire subject property is classified as a Critical Biodiversity Area 1 (CBA1), with only a small portion in the south-western section, adjacent to the municipal reservoirs, identified as being in an impacted condition. Similarly, the faunal specialists confirmed that the wider Paapekuilsfontein property (RE/281), which includes Erf 3495, is mapped as CBA1. They emphasised that maintaining ecological functioning and landscape connectivity within this area is an important consideration when assessing the potential impacts of the proposed development.

According to the WCBSP (2023), a CBA1 comprises an area in a natural condition that is required to achieve biodiversity targets for species, ecosystems, ecological processes and infrastructure. The management objective is to maintain these areas in a natural or near-natural state, prevent further loss of natural habitat and rehabilitate degraded areas where necessary. Only low-impact, biodiversity-sensitive land uses are considered appropriate within these areas. An ESA1, on the other hand, refers to an area that is not essential for meeting biodiversity targets but plays an important supporting role in maintaining protected areas and CBAs, as well as providing essential ecosystem services. The management objective is to maintain these areas in a functional, near-natural state. While some loss of habitat may be acceptable, such loss should not compromise the underlying biodiversity objectives or ecological functioning of the area.

The WCBSP classification contributes to the Very High terrestrial biodiversity sensitivity rating assigned to the erf. The botanical specialist confirmed that this rating is supported by the property's CBA1 classification, the Critically Endangered status of the vegetation, its largely intact condition and its connectivity with the natural habitat on RE/281. The specialist further explained that the primary conservation function of the CBA1 in this area is to maintain ecological connectivity between the urban edge of Struisbaai and the protected areas of Agulhas National Park. Erf 3495 forms part of this continuous tract of Agulhas Limestone Fynbos along the urban edge. Its contribution to landscape connectivity is therefore dependent on maintaining a direct connection with the natural habitat on RE/281. Accordingly, retaining natural habitat along the western and northern boundaries would preserve this connectivity, whereas retaining isolated patches of vegetation within the development footprint would not fulfil the same ecological function.

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.

Western Cape Biodiversity Spatial Plan Classification

The property, Erf 3495, Struisbaai, is mapped almost in its entirety as a Critical Biodiversity Area 1 (CBA1) in the Western Cape Biodiversity Spatial Plan (WCBSP) (2023). A small area in the south-west of the property, adjacent to the municipal water reservoirs, remains unclassified. A CBA1 is an area in a natural condition that is required to meet biodiversity targets for species, ecosystems or ecological processes and infrastructure. The management objective for a CBA1 is to maintain it in a natural or near-natural state, with no further loss of natural habitat. Only low-impact, biodiversity-sensitive land uses are considered appropriate. An ESA1 is not essential for meeting biodiversity targets, but it plays an important role in supporting the functioning of protected areas and CBAs. The management objective for an ESA1 is to maintain it in a functional, near-natural state. Some habitat loss is acceptable, provided that the underlying biodiversity objectives and ecological functioning are not compromised. The National Web-based Environmental Screening Tool rates the terrestrial biodiversity sensitivity of the property as Very High. This rating is triggered by the CBA1 and ESA classifications, the Critically Endangered status of the Agulhas Limestone Fynbos, the property's location within a focus area of the National Protected Area Expansion

Strategy, and its location within the SANParks buffer of Agulhas National Park. The Botanical and Terrestrial Biodiversity Impact Assessment (McDonald, October 2026) verified this rating in the field.

Site-Specific Features of the CBA1

The botanical and faunal specialist assessments confirmed the site-specific features underpinning the CBA1 classification. The entire property supports Agulhas Limestone Fynbos, a vegetation type listed as Critically Endangered. The Red List of Ecosystems (SANBI, 2022) maps the property as a remnant of a Critically Endangered ecosystem. Apart from the existing tracks and the stands of invasive *Acacia*, the vegetation is intact and in fair to good condition and includes limestone pavements and outcrops that support many limestone endemics. The property supports a subpopulation of the Endangered *Mimetes saxatilis* at the eastern limit of its distribution. Other species of conservation concern recorded on the property are *Leucospermum patersonii* (Vulnerable), *Gladiolus miniatus* (Vulnerable) and *Gladiolus variegatus* (Vulnerable), together with several Near Threatened limestone endemics. The Faunal Impact Assessment assigns a High Site Ecological Importance to the habitat of the Black Harrier, the Southern Adder and the Scarce Mountain Copper, and to faunal landscape connectivity.

Ecological Function of the CBA1

Beyond these site-specific features, the CBA1 performs an important landscape function. The property lies at the eastern end of a continuous tract of natural Agulhas Limestone Fynbos, which extends westwards over the Remainder of Farm Paapekuilsfontein No. 281 (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 functioning of the CBA1 further depends on the ecological processes that sustain Agulhas Limestone Fynbos. These are fire, pollination by birds and insects, and the dispersal of seed by indigenous ants. They are essential to the persistence of the proteoid species, including *M. saxatilis*, and of the lycaenid butterflies recorded on the property, whose larval development depends on associations with ants.

Impact of the Proposed Development on the CBA1

The proposed development will result in the permanent clearing and transformation of approximately 8.15 ha, or 67% of the property, for residential erven, private streets and services. This loss of Critically Endangered vegetation within a CBA1 is not consistent with the CBA1 management objective of no further loss of natural habitat. The botanical specialist identifies the loss of Agulhas Limestone Fynbos in a CBA1, and the loss of habitat of *M. saxatilis*, as red flags for the development. Within the development footprint, the site-specific features of the CBA1 will be lost irreversibly. These features include the vegetation, the limestone outcrop habitat and the associated faunal habitat. They also include part of the *M. saxatilis* subpopulation, which cannot be relocated through search and rescue because the species does not transplant successfully.

For the preferred layout (Alternative 2), the botanical specialist rates the loss of Agulhas Limestone Fynbos and CBA1 habitat as High Negative before mitigation and Medium Negative after mitigation. The same rating applies to the loss of plant species of conservation concern. The faunal specialist rates both the permanent loss of faunal habitat and the fragmentation of faunal landscape connectivity as Medium–High Negative before mitigation and Medium Negative after mitigation. The development will also affect the functioning of the retained habitat through edge effects. These include the exclusion of fire, trampling, dumping, domestic animals, artificial lighting, the spread of alien invasive plants, and the spread of the Argentine ant, which disrupts ant-mediated seed dispersal. The botanical specialist rates the impact on ecological processes in the retained habitat as Medium Negative before mitigation. With mitigation, this reduces to Low Negative, on condition that the retained habitat is managed together with the adjoining conservation area on RE/281. The ESA1 area adjacent to the reservoirs is partly disturbed and of lower sensitivity, and its loss does not alter the overall assessment.

Influence on the Development Layout

These findings directly influenced the layout of the proposed development. Alternative 1 proposed 84 single residential erven, with a development footprint of approximately 10.16 ha, or 83% of the property. Its retained Nature Conservation Area of approximately 2.06 ha formed a narrow band across the centre of the property, enclosed by residential erven on both sides. In this configuration, the retained habitat would have been isolated from RE/281 and exposed to edge effects on all sides, and the botanical specialist considered it unlikely to remain functional. Both specialists rated the residual impacts of Alternative 1 on the CBA1 as High Negative and did not support it.

Alternative 2 on the other hand, removes the thirteen erven on the northern slope (Erven 83 to 95), reducing the development to 72 residential erven and the footprint to approximately 8.15 ha. The Erf 80 Nature Conservation Area is enlarged to approximately 3.96 ha, or 32.7% of the property, and retained as a single block occupying the entire northern portion of the property. Erf 80 adjoins the natural habitat on RE/281 along the western and northern boundaries. Compared with Alternative 1, this configuration avoids the loss of a further of approximately 2 ha of CBA1 habitat. It also keeps the retained habitat physically connected to the wider natural landscape, with a single developed edge. This maintains the connectivity function that the botanical specialist identifies as the principal role of the CBA1 in this area. On this basis, both the botanical and faunal specialists concluded that Alternative 2 is the better development configuration.

Protection and Management of the Retained Habitat

The CBA1 status of the property has also informed the measures proposed to secure and manage the retained habitat, which are to be included in the Environmental Management Programme and as conditions of approval. Erf 80 must be zoned for nature conservation and protected by a title deed restriction or an equivalent legal instrument. It must be incorporated into the management of the RE/281 conservation area, and fenced on its developed edge only, with fauna-permeable fencing. A census of *M. saxatilis* and other proteoid species of conservation concern must be undertaken in spring, before the layout is finalised. The boundary of Erf 80 and the adjacent erven must then be adjusted to retain the densest stands where feasible. Firebreaks must be placed on the developed edge rather than within Erf 80, so that ecological burning of Erf 80 together with RE/281 remains possible. An alien invasive plant clearing programme must be implemented, together with controls on the Argentine ant, domestic animals, access and lighting. All landscaping must use locally indigenous species.

Residual Impact and Biodiversity Offset Considerations

The specialists confirm that a residual impact of Medium Negative significance on a Critically Endangered ecosystem within a CBA1 is the level at which a biodiversity offset must be considered. This requirement arises under the National Biodiversity Offset Guideline (DFFE, 2023) and the Western Cape Guideline on Biodiversity Offsets (DEA&DP, 2015). On-site mitigation cannot reduce this residual impact further. Two considerations therefore informed the preparation of the Struisbaai Conservation Master Plan, the cumulative pressure on Agulhas Limestone Fynbos at Struisbaai, and the need to secure the connectivity function of the CBA1 at a landscape scale. The Master Plan proposes conservation areas of approximately 327 ha on RE/281, in the order of forty times the development footprint of Alternative 2. These areas adjoin Erf 3495 and Erf 80, comprise the same vegetation type on the same limestone substrate, and extend towards Agulhas National Park.

The Paapekuilsfontein Conservation Master Plan

The botanical specialist supports the Master Plan as the appropriate mechanism to address the residual impacts of Alternative 2, subject to five conditions. The first is that the conservation areas are legally secured in perpetuity, for example through declaration as a nature reserve or protected environment, a biodiversity stewardship agreement with Cape Nature, or incorporation into Agulhas National Park. The second is that a management plan, with a responsible management authority and secured funding, is in place. The third is that the conservation areas and corridors are shown explicitly on the final Master Plan and verified in the field. The fourth is that the conservation areas are secured before, or at the same time as, the loss of habitat on Erf 3495. The fifth is that the adequacy of the conservation areas is demonstrated against the combined residual impacts of all of the

developments proposed in the Master Plan. If these conditions are met, the cumulative impact of the development on Agulhas Limestone Fynbos would be reduced from Medium Negative to Low Negative. If they are not met, a separate biodiversity offset for Erf 3495 would be required. The faunal specialist similarly regards the broader conservation framework as an important landscape-scale component of the mitigation for the development. The determination of whether the Master Plan is an adequate substitute for a biodiversity offset, and whether further offset measures are required, rests with the competent authority, informed by Cape Nature and SANParks.

Conclusion

In summary, the proposed development will result in the permanent loss of approximately 8.15 ha of CBA1 habitat, and a residual impact of Medium Negative significance on the site-specific features of the CBA1 will remain. The botanical specialist concluded that the identified red flags are not fatal flaws for Alternative 2, provided that the conditions relating to the Conservation Master Plan are met. The CBA1 classification has informed the reduction of the development footprint and the selection of Alternative 2 as the preferred layout. It has also informed the retention of the northern portion of the property as a single, connected conservation area, which maintains the ecological link between the urban edge of Struisbaai and the natural landscape extending to Agulhas National Park. Finally, it has informed the commitment to secure and manage Erf 80 and the adjoining conservation areas on RE/281, so that the biodiversity targets and connectivity function of the CBA1 are maintained at a landscape scale.

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 proposed development site is not located within a protected area. Erf 3495, Struisbaai, is not declared or proclaimed as a national park, nature reserve, protected environment, or other protected area in terms of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003). It also does not form part of the Cape Floral Region Protected AreasWorld Heritage Site. The property is zoned Agricultural Zone, falls within the Struisbaai urban edge, and is identified for future residential use in the Cape Agulhas Municipality Spatial Development Framework (2022–2027). A protected area management plan therefore does not apply to the proposed development area.

The site is, however, located in a landscape of high conservation importance on the Agulhas Plain. The surrounding region contains several formally protected areas, including Agulhas National Park, which is managed by South African National Parks (SANParks), and provincial and private nature reserves such as De Mond Nature Reserve and the Heuningsrivier Private Nature Reserve. The National Web-based Environmental Screening Tool identifies the property as falling within the SANParks buffer of Agulhas National Park and within a focus area of the National Protected Area Expansion Strategy (NPAES). Together with the Critically Endangered Agulhas Limestone Fynbos and the Critical Biodiversity Area 1 (CBA1) classification, these features contribute to the Very High terrestrial biodiversity sensitivity rating assigned to the site. Inclusion in a buffer or an NPAES focus area does not confer protected area status. It does, however, indicate that the area is of strategic importance for the future expansion and connectivity of the protected area network.

The Botanical and Terrestrial Biodiversity Impact Assessment and the Animal Species Impact Assessment confirm that Erf 3495 lies at the eastern end of a continuous tract of natural Agulhas Limestone Fynbos. This tract extends westwards over the Remainder of Farm Paapekuilsfontein No. 281 (RE/281) towards the protected areas of Agulhas National Park. The principal function of the CBA1 in this area is to maintain the ecological connection between the urban edge of Struisbaai and the national park. The preferred layout (Alternative 2) supports this function by retaining the northern 3.96 ha of the property as the Erf 80 Nature Conservation Area. Erf 80 is a single block adjoining the natural habitat on RE/281 along the western and northern boundaries, and is intended to be managed together with it.

The proposed development also forms part of a broader landscape-scale conservation framework, the Struisbaai Conservation Master Plan. This plan proposes conservation areas of approximately 327 ha on RE/281, adjoining

Erf 3495 and extending towards Agulhas National Park. The botanical specialist recommends that these conservation areas be secured in perpetuity, for example through:

- declaration as a nature reserve or protected environment;
- a biodiversity stewardship agreement with Cape Nature; or
- incorporation into Agulhas National Park, with a title deed restriction.

If secured in this manner, the conservation areas would contribute to the objectives of the NPAES and to the consolidation of the protected area network on the Agulhas Plain.

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

Terrestrial Animal Species Assessment

Influence of fauna on the proposed development

A Faunal Impact Assessment was undertaken for Erf 3495, Struisbaai, by Venter & Swart (November 2026), in accordance with the Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Animal Species (GN 1150 of 30 October 2020). Its findings are supplemented by the faunal observations recorded during the Botanical and Terrestrial Biodiversity Impact Assessment. The faunal assessment considered the animal Species of Conservation Concern (SCC) identified by the National Web-based Environmental Screening Tool, together with the broader faunal community and the role of the site in maintaining ecological processes and landscape connectivity. A broader faunal investigation was subsequently undertaken across the wider Paapekuilsfontein landholding, with additional field surveys, so that the development could be assessed in the context of the surrounding natural landscape rather than as an isolated property.

Erf 3495 is entirely covered by 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 (2022). Almost the entire property is mapped as a Critical Biodiversity Area 1 (CBA1) in the Western Cape Biodiversity Spatial Plan (CapeNature, 2023). The site lies on the south-western edge of Struisbaai and is bounded by existing residential development to the east and south. To the west and north it adjoins the Remainder of Farm Paapekuilsfontein No. 281 (RE/281), which forms part of a continuous tract of natural limestone fynbos extending westwards towards Agulhas National Park. The ecological importance of the site is therefore determined both by the habitat it contains and by its position at the urban edge of this larger connected landscape.

The faunal specialist mapped three broad faunal habitats on the property. The first is bottomland habitat in the northern part of the site, on deeper sandy soils with fewer rock slabs, which is dominated by tall, dense stands of the invasive *Acacia cyclops* (rooikrans). The second is sloped habitat, which is rocky and supports a mix of restios and *Leucadendron* with less dense alien vegetation. The third is flatland habitat, dominated by limestone rock slabs with restios, *Protea* and *Leucadendron*, and crossed by informal vehicle tracks. The rock slabs, loose rocks, dense shrubs and sandy pockets in these habitats provide important refugia and microhabitats for reptiles, small mammals and invertebrates.

Survey effort comprised meandering searches on foot by four experienced observers, combined with ten-minute point surveys, and the recording of species and signs of presence such as calls, tracks and scats. The species recorded on the property include two mammals, Cape Grysbok (*Raphicerus melanotis*) and Cape Golden Mole (*Chrysochloris asiatica*). Three reptiles were recorded: the Angulate Tortoise (*Chersina angulata*), the Ocellated Gecko (*Pachydactylus geitje*) and the Marbled Leaf-toed Gecko (*Afrogecko porphyreus*). Approximately 20 bird species were recorded, including fynbos-associated species such as the Cape Sugarbird (*Promerops cafer*) and Orange-breasted Sunbird (*Anthobaphes violacea*). Invertebrates included the Rûens Velvet Worm (*Peripatopsis lawrencei*), ground beetles, scorpions and ant species. The botanical specialist additionally recorded three

lycaenid butterflies, *Chrysoritis thysbe*, *Chrysoritis zeuxo* and *Capys alpheus*, whose larval development depends on associations with ants. Their presence indicates that the limestone fynbos on the property supports the ant–plant–butterfly relationships that are characteristic of this vegetation type and that also underpin the ant-mediated seed dispersal of many limestone fynbos plants.

The Screening Tool identified eight animal SCC for consideration. These are the Black Harrier (*Circus maurus*), Denham's Bustard (*Neotis denhami*), Southern Black Korhaan (*Afrotis afra*), African Marsh Harrier (*Circus ranivorus*), Fynbos Buttonquail (*Turnix hottentottus*), Southern Adder (*Bitis armata*), Scarce Mountain Copper (*Trimenia malagrida maryae*) and Yellow-winged Agile Grasshopper (*Aneuryphymus montanus*). None of these species was observed during the field survey. However, the specialist confirmed that suitable habitat is present for several of them and assessed the likelihood of occurrence of the Southern Adder as high. The Site Ecological Importance (SEI) was determined for each receptor in accordance with the Species Environmental Assessment Guideline (SANBI). SEI was rated High for the Black Harrier, the Southern Adder, the Scarce Mountain Copper and faunal landscape connectivity, and Medium for Denham's Bustard, the Southern Black Korhaan and the Fynbos Buttonquail. It was rated Very Low for the African Marsh Harrier and the Yellow-winged Agile Grasshopper, for which suitable habitat is absent or marginal. The overall SEI of the faunal habitats and ecological processes on the property is High. The specialist identified the principal faunal concern as the permanent loss and fragmentation of natural habitat, and the associated reduction in the capacity of the site to support faunal populations and to maintain movement, dispersal and recolonisation between the site and the wider natural landscape.

These findings, together with those of the botanical specialist, informed the selection of Alternative 2 as the preferred layout. Alternative 1 proposed 84 single residential erven and a development footprint of approximately 10.16 ha. Thirteen of these erven (Erven 83 to 95) lay on the northern slope of the property. The retained Nature Conservation Area of approximately 2.06 ha formed a narrow diagonal band across the centre of the property, enclosed by residential erven on both sides. Retained habitat in that configuration would have been isolated within the estate, exposed to edge effects on all sides and of limited value for faunal movement. The faunal specialist rated the habitat loss, fragmentation, construction and operational impacts of Alternative 1 as High Negative even after mitigation. Alternative 2 removes the thirteen northern erven, reducing the development to 72 single residential erven and the development footprint to approximately 8.15 ha. The Erf 80 Nature Conservation Area is enlarged to approximately 3.96 ha (32.7% of the property) and retained as a single consolidated block occupying the entire northern portion of the property, including the bottomland and much of the sloped habitat. Erf 80 adjoins the natural habitat on RE/281 along the western and northern boundaries of the property. The faunal specialist identifies the retention of Erf 80 in this configuration as the most important avoidance measure for the development. It maintains a direct ecological connection between the retained habitat on Erf 3495 and the wider natural landscape, and it confines the developed edge of the conservation area to a single interface. On this basis, the specialist concluded that Alternative 2 is the most favourable development configuration from a faunal perspective.

The faunal findings have also informed the configuration of the estate perimeter. The development is proposed as an access-controlled residential estate, and perimeter security fencing will therefore form part of it. Fencing that encloses the entire property would sever the connection between Erf 80 and the adjoining natural habitat and constrain the movement of terrestrial fauna such as the Angulate Tortoise, the Cape Grysbok and other ground-dwelling species. On the specialist's recommendation, the security perimeter is to enclose the residential component and associated private infrastructure, leaving Erf 80 physically connected to the natural habitat on RE/281. Where fencing must cross a faunal movement interface, fauna passages must be provided for smaller terrestrial fauna and, where feasible, for larger species such as the Cape Grysbok. These passages must remain functional throughout the operational phase and may not be blocked by landscaping, security modifications or estate management practices. Any electrified strands must be designed so that they do not create a mortality risk at the passages, and solid walls may not be used along conservation edges where a permeable security treatment can provide the required security function. The specialist rates the residual fencing-related impact as Low

Negative where Erf 80 remains outside the security perimeter, and as Medium Negative where Erf 80 is enclosed within it.

The faunal investigation of the wider Paapekuilsfontein landholding confirmed that faunal movement, habitat connectivity and cumulative habitat loss operate at a scale well beyond the boundaries of Erf 3495. This finding informed the preparation of the Struisbaai Conservation Master Plan (**Figure 6**). The Master Plan identifies conservation areas of approximately 327 ha on RE/281, adjoining Erf 3495 to the north and west and extending westwards towards Agulhas National Park, and seeks to retain a connected network of natural habitat while concentrating development within defined portions of the landholding. Erf 80 is intended to form the local connection between the development and this conservation network, and to be managed together with it, particularly in respect of alien vegetation control, rehabilitation and fire management. The faunal specialist regards the broader conservation framework as an important landscape-scale component of the mitigation for the development, because it addresses cumulative habitat loss and fragmentation that cannot be adequately managed within Erf 3495 alone. The specialist notes, however, that the framework does not alter the site-level SEI classifications or impact ratings, and that its regulatory treatment, including whether any further conservation mechanism is required, rests with the competent authority, informed by CapeNature.

The presence of fauna on the site has further informed the construction-phase controls included in the Environmental Management Programme (EMPr). Erf 80 is to be surveyed, demarcated and treated as a construction no-go area before site establishment. No construction camps, laydown areas, stockpiles, spoil, vehicle parking or access routes may be placed within it. Clearing is to be confined to the authorised footprint and is to proceed progressively, in a direction that allows mobile fauna to move towards the retained habitat. A pre-construction faunal inspection of rock slabs, dense shrubs and other refugia is to be undertaken immediately before clearing. Slow-moving fauna that cannot leave the construction area safely are to be relocated a short distance into suitable adjoining habitat, where this is legally permissible. If a Southern Adder or other reptile is encountered, work is to stop until the animal has moved away or has been removed by a competent person. Snakes may not be killed, and the EMPr is to include a snake-removal procedure. Vegetation is to be checked for active bird nests before clearing, and excavation work is to pause where subterranean fauna such as the Cape Golden Mole are encountered. Excavations are to be closed promptly, and escape ramps provided in those left open overnight. Night-time construction is to be minimised, low vehicle speeds enforced, and all personnel given environmental induction. The Environmental Control Officer is to record all fauna encountered, rescued, relocated or killed.

The faunal findings have also shaped the operational controls to be included in the EMPr, the Architectural Guidelines and the Homeowners' Association constitution. These address the edge effects of residential occupation on the retained habitat. External lighting is to be limited to that required for safety and security, and is to be low-level, shielded, downward-directed and warm-spectrum. There is to be no lighting on the edge of Erf 80 and no floodlighting of the conservation interface. Free-ranging dogs are not permitted in Erf 80, and dogs adjoining the conservation area must be leashed. Free-roaming domestic cats are to be prohibited or tightly controlled because of the risk they pose to reptiles, small mammals, ground-dwelling birds and invertebrates. A maximum speed of 30 km/h, supported by traffic calming where required, is to apply on internal roads adjoining Erf 80, and residents are to be made aware of tortoises and snakes on the roads. Landscaping is to use locally indigenous species, and no garden refuse may be dumped in Erf 80. Broad-spectrum pesticides may not be used within the conservation area, and second-generation anticoagulant rodenticides are to be avoided because of the risk of secondary poisoning to raptors such as the Black Harrier. Stormwater is to be managed so that concentrated or contaminated runoff does not cause erosion or degradation within Erf 80, and stormwater structures may not become traps for terrestrial fauna. Responsibility for the long-term management of Erf 80 is to be assigned to the estate management body or another designated entity. That management is to cover alien vegetation clearing and follow-up control, ecologically appropriate fire management coordinated with the broader Paapekuilsfontein landscape, the protection of host plants and microhabitats of the Scarce Mountain Copper, and ongoing

monitoring. Monitoring is to include encroachment, fauna passages, faunal mortality, the effects of domestic animals and light spill, with adaptive management where impacts are greater than anticipated.

With the implementation of these measures, the faunal specialist rates the principal faunal impacts of Alternative 2 as Medium–High Negative before mitigation and Medium Negative after mitigation. These impacts are the permanent loss of habitat, fragmentation and reduced connectivity, construction-related disturbance and mortality, and operational degradation of the retained habitat. The permanent loss of Agulhas Limestone Fynbos and associated faunal habitat within the 8.15 ha development footprint, and the increased edge effects associated with residential development, remain residual impacts. The specialist concludes that the long-term ecological contribution of Erf 80 will depend on it being formally secured, actively managed and kept physically connected to the wider Paapekuilsfontein conservation landscape. The presence and requirements of fauna on and adjacent to the site have therefore directly informed the extent and configuration of the development footprint, the retention and configuration of the conservation area, the alignment of the security perimeter, and the construction and operational controls of the proposed development.

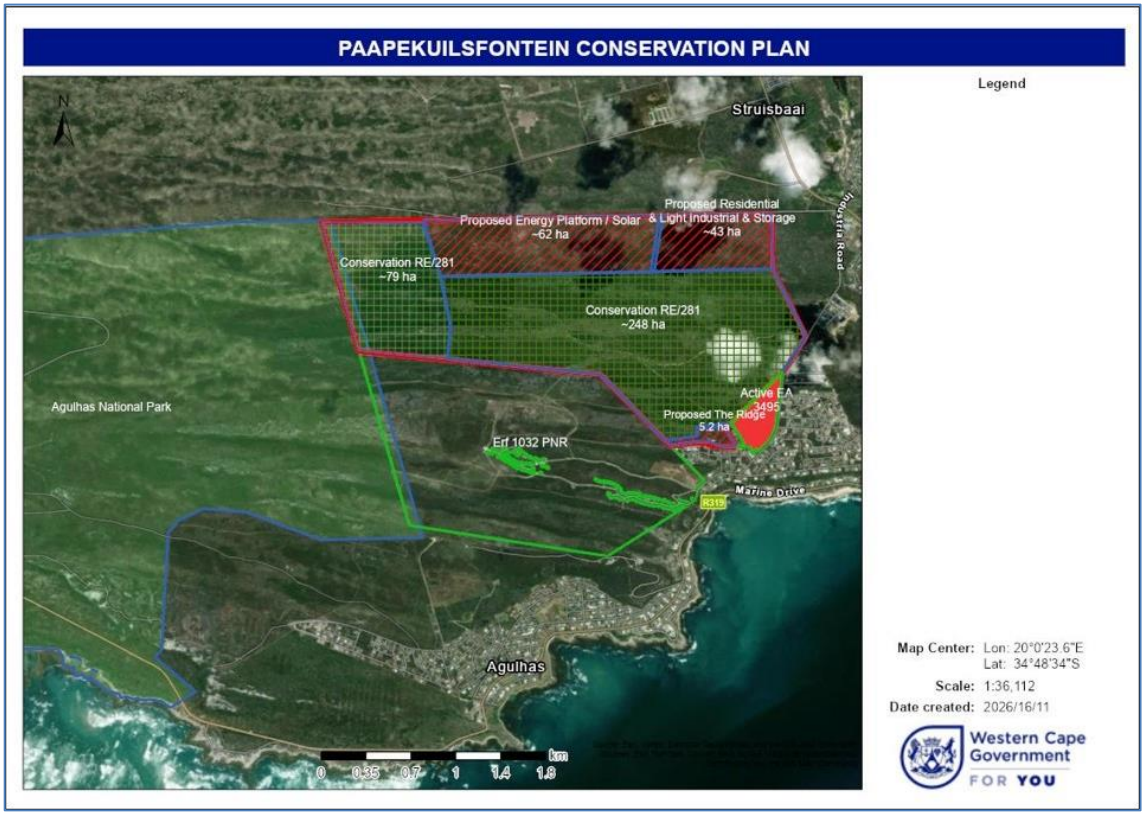


Figure 6: The proposed Struisbaai Conservation Master Plan.

5. Geographical Aspects

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

Topographical and Slope aspects

The subject property is characterised by hilly ridges formed by old coastal immobile dunes. Slope gradients across the property range from 0% to 25%. The land falls from approximately 65 m above mean sea level at the municipal reservoirs in the south to approximately 30 m at the northern apex, with a broad crest running east to west through the central erven and a steep north-facing slope across the northern portion. The topography has directly informed the layout of the preferred alternative (Alternative 2). The north-facing slope in the northern portion of the property has been excluded from development and designated as Erf 80 (Nature Conservation Area), which covers

approximately 39 600 m^2, or 32.7% of the layout area. The 72 single residential erven (Erven 1 to 71 &79) are confined to the southern and central portions of the site, adjacent to existing residential development.

The sloping terrain of the subject property has informed the layout and the building height controls in the Architectural Guidelines. The residential erven have been divided into height zones. The 45 central erven, which straddle the ridge line and the slope below it, are restricted to single-storey dwellings with a maximum height of 6.0 m above natural ground level, so that the development reads as a low, stepped group of buildings when viewed from below. Double-storey dwellings, with a maximum height of 7.5 m above natural ground level, are permitted on 19 northern erven (Erven 1, 26 to 38, 41 and 64 to 67) at the brow of the conservation area and on 8 southern erven (Erven 10 to 16 and 79) on relatively high ground behind the existing houses on Noreen Street. The VIA notes that these double storey zones were placed primarily to protect views within the estate and that, seen from outside the estate, they are the most exposed edges of the development. The double storey zones are therefore to be verified through visual simulations from Viewpoints 1, 2, 6 and 7, and erven are to be restricted to single storey, or the upper floor set back from the slope edge, where the simulations show that they would break the skyline or loom over existing houses. Building height is measured from the natural ground level established by the pre-earthworks topographical survey, and platforms raised by fill do not create a new reference level, which limits the potential for artificial height gain on sloping erven.

Geology and soils

The surface geology of the property comprises the Strandveld Formation of the Bredasdorp Group. These are unconsolidated, calcareous, wind-blown sands of Holocene age, underlain by the semi-consolidated aeolian sediments and hard calcrete lenses of the Waenhuiskrans Formation. Coastal outcrops of quartzitic sandstone of the Table Mountain Group also occur in the broader area. The site falls within Land Type Fc30, which is dominated by shallow sandy soils resting on hardpan carbonate, together with some deeper, very sandy soils. The soils display limited pedological development and a high carbonate content.

These conditions have two principal implications for the proposed development. First, the shallow soils, low water-holding capacity and limited climatic capability of the site render it unsuitable for viable crop production. The Agricultural Compliance Statement verified the agricultural sensitivity of the site as low and concluded that the development will result in a negligible loss of future agricultural production potential. Second, the presence of hard calcrete near the surface means that excavations for services will require mechanical excavation. Water pipelines are to be installed in trenches up to 1.0 m deep, erf sewer connections at a depth of 1.2 m, and main sewer pipelines in trenches up to 2.5 m deep. The calcareous aeolianite sediments of the Bredasdorp Group have the potential to contain fossil material, and excavations into these sediments are therefore to be managed in accordance with the recommendations of the Palaeontological Impact Assessment, including chance-find procedures during construction.

Hydrology, drainage and services infrastructure

No rivers or wetlands are present on or near the property, and the site is not subject to flood risk. Two existing municipal bulk water mains, both located within registered servitudes, traverse the property: one from south-west to north-east and one from south to north. These mains convey water from the municipal reservoirs to Struisbaai, and the Cape Agulhas Municipality will not permit any connections to them. The alignment of these servitudes is a fixed constraint on the site layout. The development has been designed so that the servitudes are accommodated within the layout, and will remain as undeveloped open spaces, as indicated in the preferred layout (Alternative 2).

Coastal setting, climate and visual context

The property is situated on the Cape South Coast, approximately 2 km south of the Struisbaai town centre and approximately 3 km north of Cape Agulhas. Because the lowest point of the site is approximately 35 m above mean sea level, the development is not exposed to sea-level or coastal flood effects. The area falls within the winter-

rainfall region of the Western Cape, although rain occurs throughout the year, and the proximity of the sea moderates temperatures. The site's elevated topography and its visibility from the surrounding town have informed the binding Architectural Guidelines. These guidelines provide for a restrained, regionally appropriate built form, controls on building height and wall surfaces, visually permeable fencing along the conservation area and private open space edges, and controls on external lighting to limit visual intrusion.

6. Heritage Resources

6.1.	Was a specialist study conducted?	YES x	NO
6.2.	Provide the name and/or company who conducted the specialist study.		

The **Heritage Impact Assessment (HIA)**: Cindy Postlethwayt

The **Palaeontological Impact Assessment (PIA):** John Pether

The **Visual Impact Assessment (VIA)** Ankia Bormans of Terra+ (Terra Landscape)

6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.

Heritage Impact Assessment

The HIA was prepared in line with Section 38(3) of the NHRA and HWC's guidelines for NID and HIA submissions (February 2021). It draws on historical reports and maps, historical aerial photographs, Deeds Office and Surveyor-General records, secondary sources, a review of heritage and planning policy, and a site inspection. The findings of the VIA, the PIA and the Botanical and Terrestrial Biodiversity Impact Assessment are integrated directly into the report.

The HIA notes that the property is zoned Agriculture. A rezoning from Agriculture to Subdivisional Area, and a subdivision, will be needed to create the residential erven, streets and open spaces.

The proposed development triggers Section 38(1)(a), (c)(i) and (d) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA). A Notification of Intent to Develop (NID) was submitted to Heritage Western Cape (HWC) under HWC Case Number HWC23083108MS0904. In its Response to the NID, HWC required a Heritage Impact Assessment (HIA), with specific reference to a Palaeontological Impact Assessment (PIA) and a Visual Impact Assessment (VIA) of the cultural landscape. As an application in terms of NEMA is required, the HIA is to be submitted to HWC for comment in terms of Section 38(8) of the NHRA.

The property and its history

Erf 3495 lies on the western side of Adelle Street, at the edge of the existing built-up area of the coastal town of Struisbaai, in the Bredasdorp district. The property is 12.2244 ha in extent. It is undeveloped, has not been farmed and remains in its natural state. It falls well within the Struisbaai Urban Edge, into which it was brought in 2017.

The HIA traces the history of the land in some detail. Before Dutch settlement of the Cape, the area south of the Langeberg and west of the Breede River was home to the Chainouqua Khoikhoi, who were progressively dispossessed as European settlement spread eastwards. Paapekuilsfontein (Farm 281) was one of the earliest land grants in the region, granted in 1836, and much of Struisbaai and L'Agulhas has since been developed on portions of the farm. The original title deed of 1836 records that the public's right to fish along the coast was to be retained, which confirms that Struisbaai was historically a fishing community. The vernacular cottages of the Hotagterklip fishing community, whose residents were forcibly removed under the Group Areas Act, are now a Provincial Heritage Site. Erf 3495 itself is a relatively recent subdivision from Paapekuilsfontein, created in 2005 when a larger erf was divided into three portions; the other two portions have since been developed as 344

residential erven. The historical aerial photographs show that the core of Struisbaai was laid out by 1960, with development gathering pace from the 1980s.

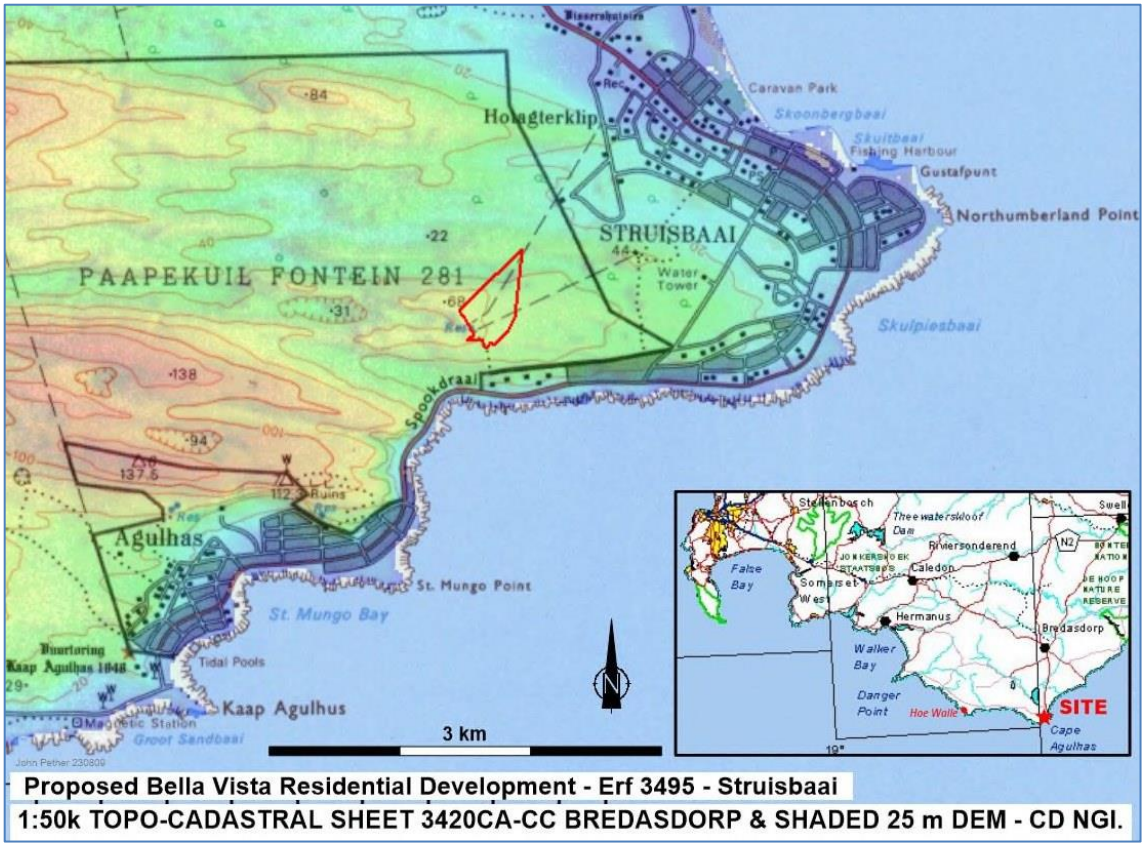


Figure 7: Location of Erf 3495 on the south-western outskirts of Struisbaai. ***Source**:* Pether (2026).

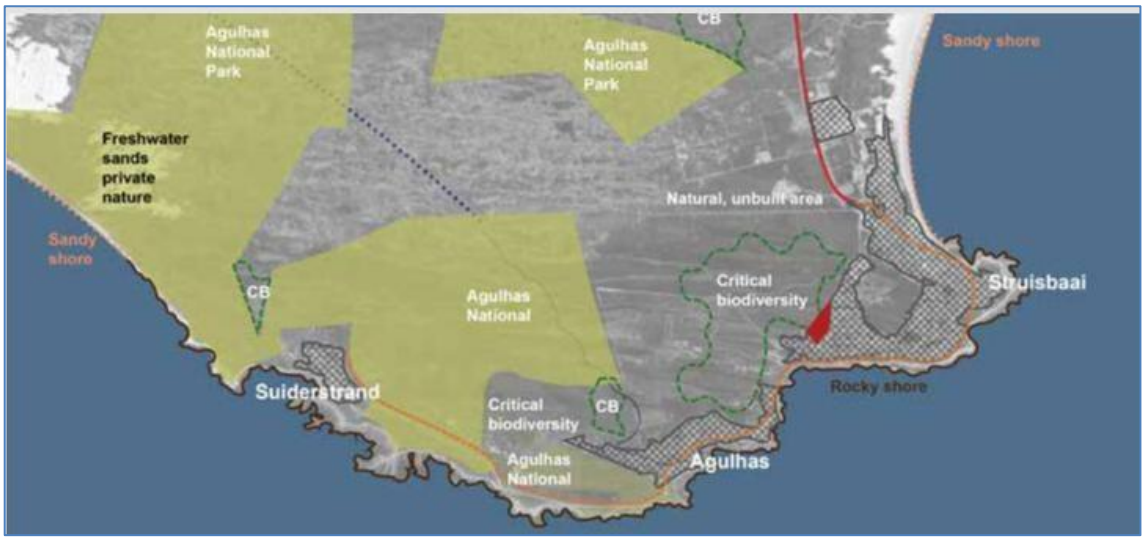


Figure 8: The site outlined in red within its local setting, showing the built-up area of Struisbaai in relation to the surrounding natural vegetation and protected areas. ***Source***: Postlethwayt (2026).

Heritage resources identified

The HIA assessed the property against each category of heritage resource listed in the NHRA and graded its significance using the three-tier system of the NHRA and HWC's grading guidelines (2016). Its findings are as follows.

There are no buildings or structures on the property. No places associated with oral traditions have been established, and none is considered likely. The property does not fall within a noteworthy historic settlement or significant townscape. Because it has long been separated from the parent farm, it has no remaining associations of historical or social significance. No geological sites of significance were identified, and no burial sites are known on the property. Although the parent farm would, as an early colonial farm, undoubtedly have used slave labour, the HIA does not regard this property as likely to have any direct association with the history of slavery. No moveable heritage objects apply. Struisbaai is generally regarded as an area of high archaeological sensitivity, however, the HIA notes that, on precedent, these sensitivities are generally found along the coastline, which the property does not adjoin.

The HIA identifies two primary heritage informants for the property.

The first is landscapes and natural features of cultural significance. The HIA considers contextual and natural significance to be the main heritage informants, because the site lies within a Critical Biodiversity Area 1 (CBA1) and sits at the outer edge of existing built form, although well within the Urban Edge. The property supports mature Agulhas Limestone Fynbos, a Critically Endangered vegetation type identified to be in good condition, apart from patches of invasive rooikrans, Port Jackson willow and manatoka. It supports several limestone-endemic plant species, including species of conservation concern, namely the Endangered *Mimetes saxatilis*, which cannot be transplanted. The Screening Tool rates the site's terrestrial biodiversity sensitivity as Very High. The HIA describes the site as largely undisturbed and in its natural state, at the edge between the town and the open natural landscape, and considers it a good-quality natural landscape. Its visual quality is enhanced by the intactness of the landscape and the absence of visual intrusions, and the HIA rates its visual sensitivity as Medium or Moderate. The HIA further notes that the site has uncommon, rare and endangered qualities that reflect the Western Cape's natural heritage.

The second is palaeontological resources. The property is underlain by the Waenhuiskrans Formation, which is rated Very High on the palaeosensitivity map of the South African Heritage Resources Information System (SAHRIS).

The wider cultural landscape

The HIA recognises the broader Agulhas area as a cultural landscape of significance. Since the area is situated on the southernmost tip of Africa, it attracts visitors throughout the year and has important vistas and scenic routes. The Agulhas Plain is described as one of the largest remaining stores of lowland fynbos and renosterveld habitats in the world, and the HIA notes that the primary character of this landscape lies in its natural rather than its cultural attributes. Drawing on the VIA, the HIA describes the area as a coastal landscape that has gradually evolved over time, shaped by its history of fishing and residential use. It retains a strong sense of place, with the character of a small, quiet fishing and holiday town set between the fynbos and the sea.

There are no formal heritage surveys for the region. The formally protected heritage resources including the Cape Floral Region Protected Areas World Heritage Site, Agulhas National Park, several provincial and private nature reserves, and Provincial Heritage Sites such as the Cape Agulhas lighthouse, are located some distance from the property. The Cape Agulhas Municipal Spatial Development Framework (2022–2027) places the site well within the Urban Edge and identifies it for future residential use, while also noting that it lies within a CBA.



Figure 9: Natural open area on the site, with indigenous fynbos, overlooking the 14 km beach at Struisbaai to the north. ***Source:*** Postlethwayt (2026).



Figure 10: The site as a natural open area with existing residential properties on two sides. ***Source:*** Postlethwayt (2026).

Statement of significance and development informants

The HIA concludes that the property falls well within the Urban Edge of Struisbaai and has no intrinsic historical or architectural significance. It does, however, contribute to contextual significance, because it keeps its open and natural qualities at the current edge of urban development, and it is of very high significance in terms of its CBA1 designation. Because of its natural state and elevated position, the site is sensitive to new development. The HIA states that care must be taken to retain and reinstate as much of the natural vegetation as possible, to keep the built form low, and to remain in keeping with the existing pattern of development.

On this basis, the HIA sets out the following development informants:

- recognise the broader cultural landscape and treat the site as one component within it;
- retain and enhance the coastal sense of place in the form, scale and type of buildings and landscaping;
- avoid new built skylines visible from the coast and from the R319;

- provide a planted buffer of naturally occurring species between existing neighbours and the new development, as an urban-to-natural transition;
- retain view lines towards the sea and allow visual permeability at the site boundaries;
- conserve and integrate the open area on the northern side of the site; and
- use naturally occurring species in gardens, buffers and open space.



Figure 11: Composite visual indicators, showing the area of naturally occurring species to be preserved in the north, the green buffer of naturally occurring species, and the existing roads that form the most visible viewpoints.

Influence on the proposed development

The HIA findings for the site directly shaped the development of the layout. Initially, Alternative 1 proposed a denser development of 84 single residential erven, with a conservation area of about 2.063 ha located separately on the far side of the steepest part of the site. The HIA does not support Alternative 1, as it would involve placing houses on the steep northern slope, which is the most visually exposed part of the site. It would also result in the conservation area being reduced by half.

Alternative 2 (preferred) confines development to the southern part of the site, providing 72 single residential erven over approximately 52.6% of the property within a private, access-controlled estate. The northern slope is kept as a Nature Conservation Area (Erf 80) of about 3.96 ha (39 600.3 m^2), or 32.7% of the property, which remains joined to the natural habitat on the adjoining Remainder of Farm 281 (RE/281). The rest of the site is made up of streets and private open space.

Alternative 2 is further controlled by Architectural Guidelines, which were prepared in response to the heritage informants. The development footprint is confined to the southern and central portions of the property, and building coverage is limited to 50% per erf. The central erven, which extend across the ridge and upper slope, are restricted to single-storey houses with a maximum height of 6 m. This is intended to create a low-profile, stepped development that follows the natural contours of the site. Double-storey houses, with a maximum height of 7.5 m, are only permitted along the northern and southern edges, with the upper floor limited to 50% of the ground-floor footprint. Building platforms may not be raised more than 1.0 m above natural ground level, particularly on the ridge-line erven (Erven 4, 5, 22, 23, 44, 62 and 69). The architectural guidelines recommend a simple,

contemporary coastal style that draws on the local architectural character without directly copying it. Houses are recommended to consist of a few narrow, rectangular forms with pitched roofs (maximum width of 6.5 m), connected by lower, lighter structures such as verandahs and pergolas. The buildings should follow the natural slope of the site and remain close to the ground.

The guidelines also prescribe a subdued colour and material palette, including warm off-white finishes, local limestone, weathered timber and dark grey roofs, to help the development blend into the surrounding fynbos landscape. Other requirements include minimal outdoor lighting at night and the use of locally indigenous plants in gardens. Revivalist architectural styles, such as Tuscan, Georgian, Cape Dutch and Victorian, are not permitted. In addition, boundaries facing Erf 80 must remain visually open, while the streetscape is intended to create a green avenue through the use of hedges. The VIA requires that street and open space planting remain low and open in character, so that the pipeline servitude corridors are retained as view lines through the development.

Palaeontological Impact Assessment

According to the National Web-based screening tool report, the site is mapped as Very High for the Palaeontological Theme due to the potential fossil bones being discovered in the coastal development. A Palaeontological Impact Assessment was undertaken for the proposed residential development. The PIA forms part of the broader heritage assessment for the project, for which Ms Cindy Postlethwayt has been appointed to undertake the Heritage Impact Assessment (HIA). The purpose of the PIA was to determine the palaeontological sensitivity of the geological formations underlying the property and the likelihood that fossils would be uncovered, disturbed or destroyed during the construction phase.

Sensitive heritage resources identified

The property is a triangle of vacant land straddling east–west orientated calcreted dune ridges and dales, adjacent to the existing residences along Adelle Street. According to the PIA, the entire property is underlain by the capping calcrete of the Waenhuiskrans Formation aeolianite (Bredasdorp Group). The Waenhuiskrans Formation consists of ancient, cemented coastal dunes that accumulated mainly during the later Quaternary. Internally it comprises “packages” of dune sand separated by reddish palaeosols and calcrete pedocretes, which are ancient, buried land surfaces and soils. The capping calcrete beneath the property is itself a cemented fossil soil, which has formed over a period of at least 100 000 years since the dunes forming the ridge became inactive. The PIA notes that the aeolianite ridge immediately west of the property has been dated to approximately 180–160 ka, and that the aeolianite beneath the project area is expected to be of similar age.

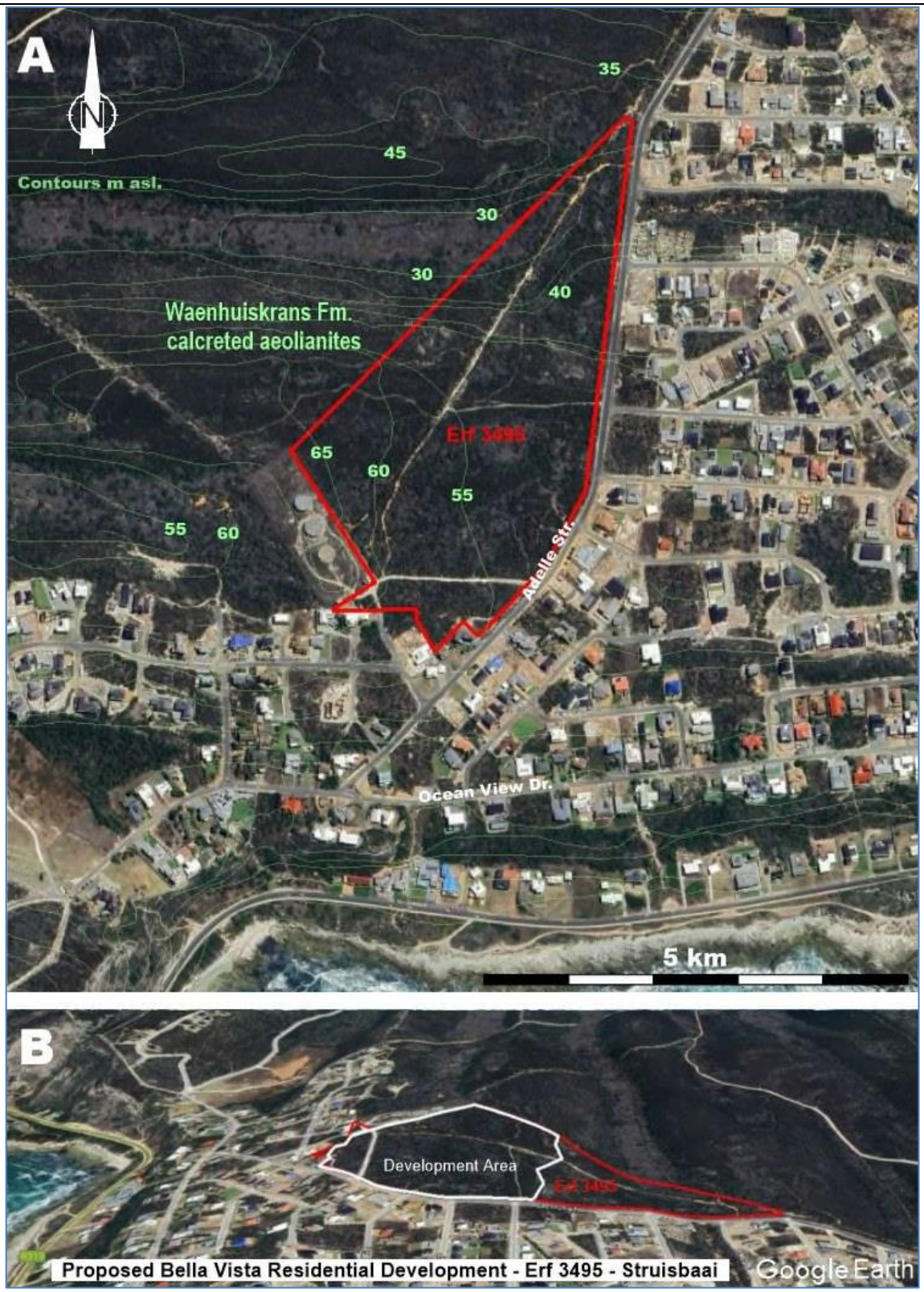


Figure 12: Landscape setting of the project area: (A) in plan view, showing the calcreted aeolianite ridges of the Waenhuiskrans Formation and contours; and (B) looking west. ***Source***: Pether (2026).

On the South African Heritage Resources Information System (SAHRIS) palaeosensitivity map, the Waenhuiskrans Formation is rated as Very High, owing to previous fossil bone finds in coastal developments, and this rating requires field assessment and a protocol for finds. Fossils that may occur in this formation include trace fossils such as calcified plant roots and burrows, an ambient fauna of land snails, tortoise remains and small mammal bones, and the sporadic bones and teeth of larger animals. These fossils are concentrated mainly on buried

palaeosurfaces. Larger bones occur in markedly greater abundance around former water sources such as vleis and springs, and in hyaena burrow lairs, which are typically excavated beneath calcrete ledges on the eroding slopes of aeolianite ridges.

Based on the specialist findings, fossil bones may be encountered beneath the property are expected to dated form approximately 60 ka to 100 ka. They would therefore consist mainly of representatives of the extant (living) fauna, although unexpected or locally extinct species may occur. Since the later Quaternary fauna is reasonably well known from archaeological sites and hyaena bone accumulations, additional finds are considered to be of moderate scientific importance. Accordingly, the specialist assigns the affected formation a site-specific sensitivity (intensity) rating of Moderate. Moreover, the property's location within the elevated ridge crest, where a local water source such as a spring or vlei is unlikely to have existed. The probability of fossil bones being relatively common on the property is therefore reduced. Hyaena burrow lairs could nevertheless occur, particularly on the eroding slopes of the ridges. A pre-construction field survey is unlikely to reveal fossil bones because of the dense vegetation cover. Fossils are therefore most likely to be exposed during construction excavations. Fossil bones cemented within calcrete are not readily visible, tend to snap off as calcrete chunks are excavated, and do not stand out against the pale enclosing matrix.

Nature and Significance of the potential impact

The PIA identifies the potential impact associated with the proposed residential development as permanent loss of fossil bones and associated archaeological material during excavations into the upper Waenhuiskrans Formation. During the construction phase, excavations will be required for conventional housing foundations, anticipated to extend to a depth of approximately 0.6 m, as well as for the installation of civil services infrastructure. These excavations will primarily affect the capping calcrete and the immediately underlying sands. The specialist notes that the impact cannot be avoided by layout design, because the locations of fossil bones within the aeolianite cannot be predicted. Without mitigation, the impact is assessed as Medium Negative, since any fossils present would be destroyed. With mitigation, the impact is assessed as Medium to High Positive, since fossils that would otherwise remain buried and inaccessible would be rescued, recorded and made available for scientific study, thereby enriching the understanding of the landscape's geological history.

Influence of heritage resources on the proposed development

The PIA concludes that the possible presence of fossils in the subsurface does not have an a priori influence on the decision to proceed with the proposed development. Because the distribution of fossils beneath the property cannot be predicted, and because the site-specific sensitivity is moderate, the palaeontological resources did not require the avoidance of any specific part of the property or the alteration of the development footprint. The PIA was prepared on the basis of a preliminary Site Development Plan providing for 72 residential erven in the southern, wider portion of the property (approximately 8 ha). The specialist confirms that amendments to the layout do not affect the recommendations of the report. The findings therefore remain applicable to the preferred layout (Alternative 2), which provides for 72 residential erven within the same southern portion of the property.

The development layout nonetheless avoids part of the terrain that the PIA identifies as having a higher likelihood of fossil occurrence. The steeper slopes on the northern portion of the property have been excluded from development and designated as Erf 80 (Nature Conservation Area: Private Open Space). This avoids excavation into these slopes, where hyaena burrow lairs are more likely to occur, although this benefit was not a specific recommendation of the PIA.

The principal influence of the palaeontological resources on the proposed development is therefore on the manner in which the construction phase is undertaken. The PIA identifies this influence as moderate, and it consists of mandatory mitigation measures that must be implemented during all excavation works. The specialist advises that continuous monitoring by a palaeontologist during construction is not feasible, because fossils may

be unearthed at any time. Successful mitigation therefore depends on earthworks personnel watching for fossil material as excavations proceed.

Visual Impact Assessment

A Visual Impact Assessment (VIA) was undertaken by Ankia Bormans of Terra+ Landscape Architects (Draft, 18 November 2026). The VIA updates the 2023 draft VIA and assesses the amended Alternative 2 Preferred Layout prepared by Umziza (16 November 2026), measured against the visual indicators established in the 2023 draft. The amended layout supersedes the layout of 18 October 2026, the Noreen Street access road has been omitted, Erf 79 is now a residential erf of 1 332 m^2, the estate is served by a single entrance/exit from Adelle Street between Erven 9 and 10, and Erven 15 and 16 have been reduced to 841 m^2 and 840 m^2 respectively. As the site lies at the edge of the town but interfaces with the open natural landscape of the Agulhas plain, the study combines aspects of Type A and Type B assessment and was undertaken as a Level 4 VIA.

The VIA describes the area as a landscape defined by horizontal lines, from the beach and sea horizon to the low ridges and relatively even height of the fynbos. The surrounding settlements are generally small and low in scale, with buildings appearing as narrow bands of white walls and grey roofs set between the fynbos and the sea. In this type of landscape, even relatively small changes in building height or position along a ridge can be visible from a considerable distance. Housing in Struisbaai, particularly in the area surrounding the site, typically consists of detached, free-standing houses of up to two storeys, with approximately half of each erf remaining naturally open.

The site is located on a low rise along the south-western edge of Struisbaai, forming a transition between the existing residential area and the open fynbos beyond. The southern and central portions of the site, where development is proposed, are relatively flat, with a broad crest running roughly east to west through the central erven. From this crest, the land slopes gently southwards towards Noreen Street and eastwards towards Adelle Street, while dropping more steeply northwards across Erf 80 towards Santie Street. Due to its elevated position, the crest offers panoramic views across Struisbaai, the bay and the sea. Although the site is not part of a prominent mountain ridgeline, it does form part of the local skyline when viewed from the lower-lying areas to the north and north-east.

For these reasons, the VIA places the site within a cultural landscape of medium to high scenic, cultural and historical significance. The site itself, however, is not a declared scenic or heritage resource, is bounded on two sides by existing development, and can accommodate a degree of change. The significance of the receiving environment is therefore rated Medium to High.



Figure 13: The typical mix of residential building styles in Struisbaai close to the site: single, free-standing houses of no more than two storeys.



Figure 14: Views from the site towards the sea.

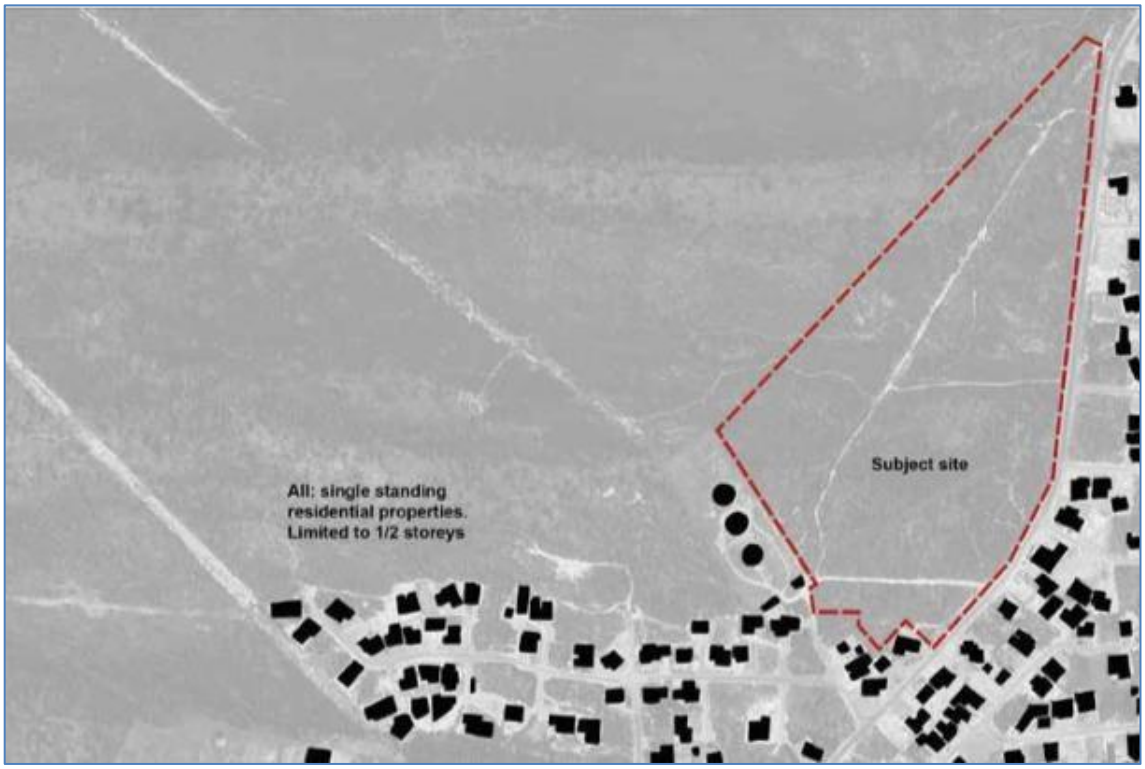


Figure 15: The built fabric surrounding the site. All surrounding properties are single residential erven of one or two storeys, and the proposal follows the same pattern of development.

The VIA identifies several visual changes associated with the proposed development. These include the clearance of fynbos for roads, services and building platforms, earthworks, site establishment, the delivery and storage of building materials, and the presence of construction workers, vehicles and equipment as individual erven are developed over time during the construction phase.

During the operational phase of the development, the main visual change will be the transformation of the site from natural fynbos to a residential development. This will introduce houses, gardens, walls and landscaping along the crest of the rise, as well as residential activity and passive recreation within the open space. There will also be an increase in traffic along Adelle Street and the introduction of artificial lighting at night. The VIA also notes that construction impacts will be noticeable but temporary, while operational impacts will be longer-term, although their visual effect may gradually soften as mitigation measures are implemented and landscaping matures.

The VIA rates the visual sensitivity of the area as Moderate, as the portion of the field of view occupied by the proposal decreases substantially beyond 500 m from the site. The visual sensitivity of receptors is rated High for the adjoining residential areas, given the frequency, duration and proximity of their exposure, and Moderate for travellers on the R319, as the route to a destination of national significance. The VIA rates the landscape's sensitivity to visual change as Moderate. Given the relatively low vegetation and elevated, open nature of the site, its Visual Absorption Capacity (VAC), referring to its ability to accommodate or screen new development, is rated Low to Moderate. However, this varies across the site. The southern and eastern portions, which are adjacent to existing residential development, have a moderate absorption capacity. In contrast, the northern edge along the brow of Erf 80 has a low absorption capacity, as buildings in this area would be more exposed and visible against the skyline. The visual absorption capacity is expected to improve as the proposed landscaping and vegetation mature.

The VIA further notes that the proposed development would extend the existing residential fabric of Struisbaai and would be partly consistent with the surrounding settlement pattern, particularly in terms of its scale and character. However, the development would remain visually noticeable because it would change the site's existing natural character. Accordingly, the visual intrusion is rated Moderate, with the overall significance of the anticipated visual impacts also rated Moderate.

The VIA measured the Preferred Layout against the visual indicators established in the 2023 draft VIA. The layout responds to the indicators relating to the broader cultural landscape, the coastal sense of place and the conservation of the open area on the northern side of the site (Erf 80). It partly responds to the indicators for a planted buffer of naturally occurring species between existing neighbours and the new development, and for the retention of view lines towards the sea, which are provided by the two pipeline servitude corridors. The avoidance of new built skylines visible from the coast and the R319 remains to be verified through simulation. The layout does not yet respond to the indicator requiring naturally occurring species in gardens, buffers and open space, as the proposed plant palette includes species not indigenous to the Agulhas plain, lawn and exotic shrubs.

To address these impacts, the VIA recommends mitigation measures focusing on building height restrictions along visually exposed areas, adherence to the prescribed building forms and colour palette in the Architectural Guidelines, and appropriate landscaping to help integrate the development into the surrounding landscape. These include the adoption of the Architectural Guidelines as a condition of approval, enforced through a Design Review Committee; dark grey or charcoal matt roofs and warm off-white, stone or timber walls, with no brilliant white or reflective finishes; a 3.0 m building line and visually open boundaries on erven bordering Erf 80; a planted buffer of naturally occurring species facing the existing houses on Noreen Street and Adelle Street; low-level bollard street lighting only, with no lighting on the edge of Erf 80 and no floodlighting, uplighting or coloured lighting; and revision of the Master Landscape Plan palette to locally indigenous species suited to the exposed coastal conditions, including the removal of non-indigenous species such as Rhaphiolepis indica and Westringia fruticosa and the replacement of riverine and forest trees, in consultation with the botanical specialist. The VIA further recommends

that the Master Landscape Plan be developed into a detailed Landscape Plan by a Registered Professional Landscape Architect prior to construction.

Assessment of the viewpoints

The VIA identifies a number of sensitive viewpoints from which the proposed development may be visible. The viewpoint ratings are preliminary, pending the further development of visual simulations, and will need to be confirmed through this modelling.

From Viewpoint 1 (Noreen Street, at the southern corner of the site), the development is expected to be highly visible, with a high level of visual intrusion for neighbouring properties. Under the amended layout, Erf 79 is a residential erf at the end of Noreen Street, with no vehicle access into the estate from this side. Erf 79 and Erven 10 to 16 fall within the southern double storey zone, and double storey houses on these erven would be the dominant elements in the foreground, with the roofs of the single storey houses on the crest seen against the sky beyond. This viewpoint is the main test of the southern double storey zone. Erven 10 to 16 are located on relatively elevated ground directly behind the existing houses, and visual simulations should establish whether double storey development in this area would create an overbearing effect on the properties to the south. A double storey house on Erf 79 would close the view into the site and is to be tested specifically.

From Viewpoint 2 (Adelle Street, opposite the entrance between Erven 9 and 10), the development would also be highly visible, with moderate to high visual intrusion. Under the amended layout this is the only vehicle entrance to the estate. The entrance, with its paved threshold and tree planting, will be the focus of the view, flanked by Erf 10 (double storey) and Erf 9 (single storey). The existing open outlook would be replaced by a residential street frontage. Although this would be consistent with the established street pattern, it would result in a noticeable loss of the natural outlook for residents opposite the site.

Viewpoint 3 is expected to experience high visibility and moderate visual intrusion. The restriction of the ridge-line erven to single-storey development is considered an effective mitigation measure, provided that the prescribed building platform and height restrictions are adhered to.

From Viewpoint 4, the development would be highly visible, with moderate visual intrusion, partly reduced by the proposed open-space corridor. This highlights the importance of retaining the servitude corridors as visual connections and green links through the development. Landscaping within these corridors should therefore remain relatively low and open to maintain views rather than creating dense vegetation barriers.

From Viewpoint 5, the development would be highly visible, with moderate to high visual intrusion. Particular attention is required along the interface with Erf 80, where visually open boundaries, natural planting along the erf edges and adherence to the proposed 3 m building line will be important in limiting the visual impact.

Viewpoint 6 is expected to have moderate visual intrusion, although this could increase to moderate to high if the northern row of houses breaks the skyline. This is an important viewpoint for assessing the northern double-storey zone. While the Architectural Guidelines allow double-storey development in this area on the basis that it is less likely to obstruct views from other erven within the development, the northern edge remains one of the most visually exposed parts of the site when viewed from outside the estate. Further visual simulations should therefore establish whether the upper floors would be visible against the sky from Karen Street and Frances Street.

From Viewpoint 7, the preferred layout (Alternative 2) is expected to result in low to moderate visual intrusion, compared with high intrusion under Alternative 1. This viewpoint demonstrates the visual benefit of retaining Erf 80 as an undeveloped area.

At Viewpoint 8, the site would be partly visible, with low to moderate visual intrusion, to be confirmed by simulation. The main consideration is whether the proposed development would be perceived as a contained extension of the existing town or as a new built form along the elevated skyline.

From Viewpoints 9 and 11, visibility and visual intrusion are expected to be low (to be confirmed by simulation for Viewpoints 9 and 11). At these distances, the development is likely to be absorbed into the existing townscape, provided that the prescribed architectural controls are implemented, particularly the use of dark, matt roof finishes and warm off-white wall colours rather than bright white finishes.

Overall, the viewpoint assessment indicates that the greatest visual sensitivity occurs along the southern and northern edges of the site, particularly where the proposed houses would be viewed from existing residential properties and surrounding streets. However, several of the preliminary ratings still require confirmation through visual simulations to properly establish the extent of visibility and the effectiveness of the proposed mitigation measures.

Night-time visual impact

The site is currently largely unlit and forms part of the dark transition between the illuminated town and the surrounding natural landscape. The proposed development would introduce additional domestic and street lighting, particularly along the elevated crest of the site. To assess the potential effect of this change, the VIA recommends that night-time visual simulations be prepared from Viewpoints 6 and 8. These should demonstrate how the proposed lighting controls in the Architectural Guidelines would limit light spill and preserve the darker character of the surrounding landscape.



Figure 16: Viewpoints identified for the visual impact assessment (VP1 to VP7 shown around the site).

Significance of the Visual impacts

During the planning, design and construction phase, negative visual impacts are anticipated as a result of site establishment, fynbos clearance, earthworks for roads, services and building platforms, the movement of construction vehicles, delivery and storage of materials, and building activities. These activities will also generate temporary visual disturbances associated with noise, dust, lighting and construction hoarding.

The impacts are expected to be localised, largely confined to the site and adjoining streets, although construction along the northern edge may also be visible from the lower-lying areas to the north. While roads and services are expected to be constructed over a relatively short period, individual houses are likely to be developed intermittently over several years. The overall duration of the construction-related impacts is therefore considered short to medium term. The intensity is rated as medium, with a high probability of occurrence. Before mitigation, the construction-phase visual impact of the preferred layout is rated as Medium Adverse. With the implementation of mitigation measures, including limiting vegetation clearance to approved construction areas, protecting Erf 80 and the designated open spaces, controlling dust and construction hoarding, rescuing suitable plants, retaining topsoil and progressively rehabilitating disturbed areas, the significance is expected to decrease to Low Adverse. Confidence in this assessment is high.

During the operational phase, the main visual impacts will arise from the extension of the existing town onto the elevated crest of the site, the loss of natural fynbos and the introduction of residential buildings into the outlook of neighbouring properties. These impacts may be experienced from adjoining residential areas, the lower-lying areas to the north and north-east, as well as sections of the R319 approach from L'Agulhas. The impacts will be long-term or permanent, although their visual prominence is expected to decrease to some extent as landscaping matures. The intensity is rated as medium, and the impacts are considered definite once the development is established. Before mitigation, the operational visual impact of the preferred layout is rated as Moderate Adverse. With the implementation of building height restrictions along exposed edges, the architectural form, colour and lighting controls, appropriate indigenous landscaping and the retention of Erf 80 as a conservation area, the significance is expected to reduce to Low to Moderate Negative. This represents a noticeable but acceptable change to the receiving environment. Confidence in this assessment is medium to high, with the visual effects of the proposed double-storey zones still requiring confirmation through simulations from Viewpoints 1, 2, 6 and 7.

In comparison, the operational visual impact of Alternative 1 is rated as High Adverse, primarily because it would introduce houses onto the steep northern slope, which is the most visually exposed part of the site, while also reducing the conservation area by approximately half.

The VIA also identifies positive aspects of the preferred layout, particularly the retention of the northern slope as a 3.96 ha conservation area and the establishment of a more defined and contained urban edge for Struisbaai. The remaining visual impact is largely associated with the permanent loss of natural fynbos and the elevated position of the site, which means that the development cannot be completely screened from surrounding areas. Nevertheless, the VIA considers that these impacts can be reduced to acceptable levels through appropriate controls relating to building height, architectural form, colour and landscaping.

Overall, the VIA concludes that, although the visual change associated with the proposed development is unavoidable, it is not expected to result in unacceptable harm to the visual resources, character of the surrounding environment or the wellbeing of people in Struisbaai, provided that the recommended mitigation measures are implemented and maintained.

Under the No-Go alternative, the site would be retained as open fynbos under its current zoning, with no change to the visual status quo.

Influence on the proposed development

The visual indicators identified in the 2023 draft VIA informed the preferred layout, in particular the retention of the steep and visually exposed northern slope as Erf 80, and the 2026 VIA confirms that Alternative 2 responds to this principal indicator and is preferred over Alternative 1. The VIA supports the single-storey restriction and the 1.0 m platform limit on the ridge-line erven contained in the draft Architectural Guidelines. However, it notes that the double-storey zones on the northern edge (Erven 1, 26 to 38, 41 and 64 to 67) and southern edge (Erven 10 to 16 and 79) were placed primarily to protect views within the estate, and requires that these zones be verified through simulations from Viewpoints 1, 2, 6 and 7. Where double-storey houses would break the skyline or loom over existing houses, the affected erven must be restricted to single storey or the upper floor set back from the slope edge. The VIA further notes that the draft Architectural Guidelines list only Erven 10 to 16 in the southern double storey zone and must be updated to include Erf 79.

The VIA further identifies several mitigation measures that need to be incorporated into the overall site management arrangements, the Homeowners' Association (HOA) constitution and the relevant title conditions. These measures should also be linked to the construction programme to ensure that they are implemented at the appropriate stages of development.

Subject to the implementation of these architectural and landscape mitigation measures, the VIA recommends the Alternative 2 Preferred Layout for approval from a visual impact perspective, however, Alternative 1 is not supported. The VIA recommends that the Architectural Guidelines be finalised to incorporate its recommendations, with particular attention to the double-storey edge zones, the plant palette and lighting, and that the proposal undergo a further round of assessment once the guidelines have been developed and 3D simulations prepared for the significant viewpoints. The HIA recommends that the revised guidelines, Landscape Master Plan and simulations be submitted to the visual specialist for final assessment and ratification by Heritage Western Cape.

Proposed mitigation measures recommended by the visual specialist:

Landscape planning and management

Before construction commences, the Master Landscape Plan must be developed into a detailed Landscape Plan by a registered professional landscape architect. The plan should address the following:

- The existing vegetation to be retained within Erf 80, the open-space corridors and along individual erf boundaries, including measures to protect these areas during construction.
- The rescue of suitable indigenous plants and the retention and reuse of topsoil and seed-bearing material from cleared areas.
- A planting palette comprising locally indigenous coastal fynbos and thicket species suited to the limestone and sandy soils, as well as the exposed and windy conditions of the Agulhas Plain.
- The use of low-growing and relatively open vegetation along streets and within the open-space corridors to maintain visual connections through the development.
- Appropriate lighting specifications, including fixture shielding and colour temperature, to minimise light spill into the surrounding natural landscape.

Planning, design and construction phase

The VIA recommends that the Architectural Guidelines be formally adopted as a condition of approval and enforced through a Design Review Committee. Particular attention should be given to the following requirements:

- The proposed northern double-storey zone (Erven 1, 26–38, 41 and 64–67) and southern double-storey zone (Erven 10–16 and 79) must be assessed through visual simulations. Where the simulations demonstrate that double-storey development would break the skyline from Viewpoints 6 and 7 or create an overbearing visual effect on existing houses from Viewpoints 1 and 2, the affected erven should be restricted to single-storey development or require the upper floor to be set back sufficiently from the slope edge to avoid being visible against the sky.
- The single-storey restriction and maximum 1.0 m building platform height above natural ground level must be maintained on the designated ridge-line erven.
- Properties bordering Erf 80 must comply with the proposed 3.0 m building line. Boundary treatments should remain visually open, with locally indigenous planting along erf edges to create a natural transition into the conservation area.
- Roof finishes must be dark grey or charcoal and matt, while walls should use warm off-white finishes, local stone or timber. Brilliant white walls and reflective materials should be avoided, particularly on elevations facing north and north-east.
- The proposed planting palette must be reviewed to remove species that are not indigenous to South Africa, including Rhaphiolepis indica and Westringia fruticosa. Riverine and forest species, such as Combretum erythrophyllum, Syzygium species and Curtisia dentata, should also be reconsidered and replaced with species better suited to the exposed coastal conditions of the Agulhas Plain, in consultation with the botanical specialist.
- The use of lawn should be limited, and the extensive lawn areas and hydrangeas depicted in the development renders should not be implemented.
- A planted buffer comprising naturally occurring indigenous species should be established along the erf boundaries facing existing residential properties along Noreen Street and Adelle Street.
- External lighting should be restricted to low-level bollard lighting, with no lighting along the edge of Erf 80. Floodlighting, uplighting and coloured lighting should not be permitted.
- Vegetation clearance must be restricted to the approved construction footprint of each erf. Erf 80 and the designated open-space areas must be clearly demarcated and protected during construction, with no access, stockpiling, dumping or other construction-related activities permitted within these areas.

Operational phase

Following completion of the development, Erf 80 must be retained and managed as a conservation area. Management should include ongoing alien vegetation clearing and appropriate fire management, with no private access, additional structures or unauthorised vegetation clearance permitted.

Landscaping must be maintained throughout the operational life of the development, with failed or unsuitable plants replaced where necessary. The Design Review Committee should also review all proposed house designs, including future additions and alterations, to ensure continued compliance with the Architectural Guidelines and the relevant recommendations of the HIA. External lighting should be monitored to ensure that it remains consistent with the approved lighting requirements and does not result in unnecessary light spill into the surrounding natural landscape.

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.
The Heritage Impact Assessment (HIA) undertaken by Ms C. Postlethwayt (November 2026) considered the proposed development of Erf 3495 against the heritage resource categories identified in Section 3 of the National

Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), read together with the definitions of heritage resources and cultural significance in Section 2.

The assessment drew on available historical information, a site inspection and the findings of the supporting specialist studies, including the Palaeontological Impact Assessment (Mr J. Pether, October 2026), Visual Impact Assessment and Botanical and Terrestrial Biodiversity Impact Assessment. Heritage significance was considered in accordance with the NHRA grading system and Heritage Western Cape's 2016 grading guidelines.

The HIA found that most of the heritage resource categories are not represented on the property or are unlikely to be affected by the proposed development. No buildings, structures, graves, burial grounds, known archaeological sites or places associated with living heritage were identified. The property is also not located within a historically significant settlement or townscape, and no geological sites of particular cultural or scientific importance were identified.

However, the assessment identified the natural landscape and its associated biodiversity as an important heritage informant. The property retains a largely undisturbed area of Agulhas Limestone Fynbos, classified as Critically Endangered, and forms part of a Critical Biodiversity Area 1 (CBA1). Its location along the edge of Struisbaai, between the existing urban area and the surrounding natural landscape, contributes to its broader landscape and heritage value. The proposed development would therefore affect this heritage resource through the clearance of natural vegetation and the introduction of residential development into the existing landscape.

The HIA also identified a potential palaeontological sensitivity. The property is underlain by the Waenhuiskrans Formation, which is rated Very High on the SAHRIS palaeosensitivity map, although its sensitivity was assessed as Moderate at site level. Fossil material may therefore be present below the surface and could potentially be affected by excavation and earthworks associated with the development.

Table 4: Findings of each heritage resource category

NHRA heritage resource category	Specialist findings	Potential to be affected
Places, buildings, structures and equipment of cultural significance	No existing structures are present on the property	No
Places associated with oral traditions or living heritage	No such associations were established and their presence is considered unlikely.	No
Historical settlements and townscapes	The property does not form part of a noteworthy historic settlement or significant townscape.	No
Landscapes and natural features of cultural significance	The property represents a largely undisturbed natural landscape containing Critically Endangered Agulhas Limestone Fynbos within a CBA1, forming a transition between the town and the surrounding natural landscape.	Yes
Geological sites of scientific or cultural importance	No such sites were identified.	No
Archaeological sites	No archaeological sites were identified. Although Struisbaai is considered archaeologically sensitive, such sites are generally associated with the coastline,	Unlikely

	which the property does not directly adjoin.	
Palaeontological sites	The property is underlain by the Waenhuiskrans Formation, which has Very High palaeosensitivity according to the SAHRIS map. However, the site-level assessment rates the sensitivity as Moderate. Fossil material may be present below the surface.	Potentially
Graves and burial grounds	No known graves or burial grounds occur on the property.	No
Sites associated with the history of slavery	No direct association with the history of slavery was identified or considered likely.	No
Movable objects	No relevant movable heritage objects were identified.	No

Elements that are not culturally or historically significant

The HIA found that the property has no intrinsic historical or architectural significance. Although it was subdivided in 2005 from the historical farm Paapekuilsfontein 281, one of the earliest land grants in the region (1836), it has long been separated from the original farm and no longer retains any meaningful historical or social association with it.

The history of the farm is closely linked to the establishment of Struisbaai as a fishing settlement. The forced removal of the Hotagterklip fishing community under the Group Areas Act also forms an important part of the area's history. However, the Hotagterklip cottages, which are now a Provincial Heritage Site, and other formally protected heritage resources in the region are located some distance from the property and will not be affected by the proposed development.

Furthermore, no buildings, graves, burial grounds, oral traditions or elements of living heritage were identified on the property that would contribute to its historical, social, spiritual or linguistic significance as contemplated in Section 2 of the NHRA.

Elements of cultural significance that will be affected

The HIA identifies two elements of cultural significance that may be affected by the proposed development, namely the natural and cultural landscape and potential palaeontological resources.

Natural and cultural landscape

The HIA recognises the broader Agulhas area as a cultural landscape with an established sense of place, characterised by a small, low-scale fishing and holiday town situated between the fynbos and the sea. Erf 3495 contributes to this landscape through its position on a low rise along the edge of Struisbaai, where it forms part of the transition between the existing residential area and the surrounding natural landscape. The property also forms part of the local skyline when viewed from the lower-lying areas to the north and north-east, while retaining much of its open and natural character.

The HIA considers the property to have very high contextual significance, particularly in relation to its CBA1 designation and its contribution to the broader natural landscape. It also has scientific value in terms of the NHRA,

as it supports uncommon, rare and threatened elements of the Western Cape's natural heritage, including the Endangered *Mimetes saxatilis* and other limestone-associated endemic species.

The VIA rates the significance of the receiving environment as Medium to High and its sensitivity to visual change as Moderate. The proposed development would result in the permanent transformation of approximately 8.15 ha of natural fynbos (the development footprint, of which the VIA estimates that approximately 7.5 ha of fynbos will be transformed) into a residential estate, extending the existing urban footprint onto previously undeveloped land along the crest of the rise.

Palaeontological resources

Palaeontological resources, including fossils, are recognised as heritage resources under Section 2 of the NHRA and are protected under the Act. According to the Palaeontological Impact Assessment (PIA), fossil material may occur within the calcrete and sandy deposits of the underlying Waenhuiskrans Formation. Potential finds include fossil bones and teeth of later Quaternary age (approximately 160 000–100 000 years old), as well as trace fossils, land snails, tortoise remains and small mammal bones. These finds would have moderate scientific significance.

The PIA notes that the property's position on an elevated ridge crest, away from former springs or vleis, makes the occurrence of fossil bones less likely. However, possible hyaena burrow lairs may occur along the eroding slopes. Excavations associated with building foundations (approximately 0.6 m deep) and service trenches (up to approximately 1.2 m deep) could expose and potentially damage or destroy fossil material where present.

The location of any fossil deposits cannot be reliably established in advance, and the existing vegetation cover limits the effectiveness of surface inspections in identifying potential fossil-bearing material. Consequently, although the likelihood of significant fossil occurrences is considered relatively low, the possibility of encountering palaeontological resources during construction cannot be excluded.

Influence on the proposed development

The findings of the HIA and supporting specialist assessments have informed both the preferred development layout and the measures proposed to manage and mitigate potential heritage impacts during construction and operation.

Choice of development layout

The HIA and VIA do not support Alternative 1, as it would introduce residential development onto the steep northern slope, which is the most visually exposed part of the site, while reducing the conservation area by approximately half. The operational visual impact of this alternative was consequently rated as having high adverse significance.

The preferred Alternative 2 confines development to the southern portion of the property and retains the northern slope as Erf 80, a 3.96 ha Nature Conservation Area, representing approximately 32.7% of the property. This area connects with the natural landscape on the adjoining Remainder of Farm 281, helping to maintain continuity with the surrounding natural environment.

This layout responds directly to the HIA's recommendation to conserve and integrate the open area along the northern side of the property. The VIA also identifies the retention of Erf 80 as a positive aspect of the preferred layout, as it keeps the most visually exposed edge of the site in its natural state. In addition, avoiding development on the steeper northern slopes reduces the likelihood of disturbing potential palaeontological resources, including possible hyaena burrow lairs and associated fossil material.

Protecting the coastal sense of place

The Architectural Guidelines incorporate several design controls intended to ensure that the proposed development remains compatible with the existing character of Struisbaai. These include restricting the central ridge-line erven to single-storey development, limiting double-storey houses to the designated northern and southern edges (subject to verification through visual simulations from Viewpoints 1, 2, 6 and 7, as required by the VIA) restricting building platforms to a maximum of 1.0 m above natural ground level and limiting building coverage to 50%.

The guidelines further prescribe a simple, contemporary coastal architectural style, characterised by narrow building forms, pitched roofs and a restrained palette of warm off-white finishes, local stone, weathered timber and dark matt roofs. Revivalist architectural styles, brilliant white walls and reflective finishes are not permitted. External lighting must also be kept to a minimum and appropriately shielded.

These measures respond to the HIA's recommendations to retain the coastal sense of place and to maintain the visual relationship between the town, surrounding fynbos and the sea. The avoidance of new built skylines visible from the coast and the R319 is still to be verified, through visual simulations from Viewpoints 6, 7 and 8, as required by the VIA.

Landscape integration and buffers

The HIA and VIA recommendations also inform the landscape planning requirements for the development. The VIA finds that the current layout and Master Landscape Plan only partly respond to these requirements: no dedicated buffer is yet provided to the existing neighbours on Adelle Street and Noreen Street, and the proposed plant palette includes species not indigenous to the Agulhas plain, lawn and exotic shrubs. The revised Landscape Plan must therefore provide planted buffers of naturally occurring indigenous species along the erf edges facing the existing houses on Noreen Street and Adelle Street, maintain visually open boundaries along Erf 80, retain low, open vegetation within the servitude corridors to preserve view lines through the development, and use locally indigenous species throughout.

Protection of palaeontological resources during construction

As potential fossil-bearing deposits cannot be reliably identified or avoided through the development layout alone, the PIA recommends that a Fossil Finds Procedure be incorporated into the Environmental Management Programme (EMPr).

Construction personnel involved in earthworks must remain alert to the possible discovery of fossil bones and archaeological material. Should any potential finds be uncovered, work in the affected area must stop and the discovery must be reported to the relevant heritage authorities. Heritage Western Cape (HWC) and the appointed standby palaeontologist must be contacted to determine the appropriate course of action.

Any significant fossil material requiring collection must be recovered under the necessary HWC permit and deposited at an approved institution, with the associated costs borne by the developer. The PIA considers that, with these measures in place, the outcome could be Medium to High Positive, as fossil material that may otherwise remain buried could be recovered and made available for scientific research.

Overall heritage impact and residual significance

With the recommended mitigation measures in place, the VIA rates the residual visual impact as Low Adverse during construction and Low to Moderate Negative during the operational phase. The HIA concludes that, although the visual transformation of the site is unavoidable given the proposed change in land use, it should not result in undue harm to the visual resources, surrounding environment or wellbeing of the Struisbaai community, provided that the recommended mitigation measures are implemented and maintained.

The residual loss of Critically Endangered Agulhas Limestone Fynbos remains rated as Medium Negative. This impact is to be addressed at a broader landscape level through the Struisbaai Conservation Master Plan.

8. Socio/Economic Aspects

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

The socio-economic baseline for the proposed development has been described with reference to the Cape Agulhas Municipality Spatial Development Framework (CAMSDF, 2022–2027), read together with the Western Cape Provincial Treasury Socio-Economic Profile for the Cape Agulhas Municipality (SEP-LG, 2022). The CAMSDF identifies Struisbaai as a coastal settlement within which managed residential growth is to be accommodated inside the defined urban edge. Erf 3495 is located within that settlement.

Regional and Demographic Profile

The Cape Agulhas Local Municipality has a total population of approximately 35,758 people. Struisbaai has a permanent population of approximately 4,188 residents and is the largest coastal settlement in the municipal area. Struisbaai functions mainly as a retirement destination, a second-home location and a holiday town. It has seen sustained population growth, driven in part by semigration from inland provinces, including Gauteng, Limpopo, the Free State and North West. As a result, its population rises during peak holiday periods, and demand for residential land, municipal services and local commercial activity follows the same seasonal pattern.

Economic and Labour Market Profile

The Cape Agulhas economy (Socio-Economic Profile, Western Cape Government 2022, as cited in the CAM MSDF) records a Gross Domestic Product per Region (GDPR) per capita of approximately R78,509. The municipal workforce comprises approximately 14,507 workers, of whom 83.8% are employed in the formal sector and 16.2% in the informal sector. Formal employment is concentrated in the semi-skilled (45.0%) and low-skilled (39.5%) categories. The Cape Agulhas area recorded the lowest unemployment rate of 12.3% in the Overberg District in 2021. Unemployment has nevertheless risen steadily since 2015. Low-skilled and semi-skilled workers are the most exposed to job losses, and the municipality has identified the empowerment of these categories as a priority.

Housing Context

Municipal housing programmes prioritise state-subsidised housing and the upgrading of informal settlements. Approximately 3,635 applicants are registered on the municipal housing waiting list. Alongside this, the municipal spatial planning framework recognises the need to accommodate market-driven residential expansion within designated urban edges, particularly in the coastal settlements where semigration-related demand is concentrated.

Surrounding Land Use

Erf 3495 is an undeveloped greenfield parcel within the Struisbaai urban edge. It is bordered by established residential development, including the Ocean View Heights neighbourhood. The Agricultural Compliance Statement prepared by SoilZA (2026) confirms that the site has low agricultural sensitivity and very limited production potential. This is attributed to shallow sandy soils underlain by hardpan calcrete and to the prevailing climatic constraints. The property does not currently support any agricultural livelihood or employment.

Socio-Economic Value of the Proposed Development

Construction phase employment

The civil works phase will create direct, short-term employment for local contractors and labourers. This phase includes approximately 12,832 m^2 of internal roads together with water, gravity sewer and electrical reticulation. The subsequent construction of 72 single residential dwellings will be phased according to plot sales. It is expected to sustain employment in the local building trades over a multi-year period. Because the local construction labour pool is predominantly low-skilled and semi-skilled, these opportunities are consistent with the municipal objective of supporting vulnerable labour categories.

Operational phase employment

Once the development is occupied, it is expected to generate long-term indirect employment in domestic services, garden maintenance, property management and estate security. It is also expected to support increased household spending at local retail, catering and service businesses in Struisbaai.

Housing supply and settlement form

The subdivision of Erf 3495 into 72 single residential erven, ranging from 617.3 m^2 to 1663.3 m^2, will provide serviced, full-title residential land for permanent residents, retirees and relocating households. Because this demand is accommodated on a greenfield parcel within the urban edge, pressure on peripheral greenfield land is reduced and the compact settlement form promoted by the CAMSDF (2022-2027) is supported.

Municipal fiscal contribution

The developer will be liable for development charges and service connection fees, as determined by the Cape Agulhas Municipality in its conditions of approval. These contributions will fund the bulk water, sewerage and road infrastructure on which the development depends. Once the property is registered as 72 residential erven, its rateable value will increase, which will broaden the municipality's rates base and its revenue for service delivery.

Compatibility with surrounding properties

The development is consistent with the residential character of the adjoining neighbourhoods. Binding architectural guidelines and height controls form part of the proposal. These include restricting 45 centrally located erven to single-storey structures, to protect views across the site and reduce the visual impact of the development as seen from Struisbaai. Double-storey dwellings are permitted on 27 erven along the northern and southern edges, subject to verification through visual simulations in terms of the VIA.

Traffic

Construction phase

Construction vehicles and heavy deliveries will temporarily increase traffic on Adelle Street and the local road network, with associated nuisance, dust, noise and road-safety risks for residents. This impact is short-term and localised, and it will be managed through the EMPr. Measures include restricting deliveries to normal working hours and away from peak periods where practicable, routing heavy vehicles via Main Road (MR261) and Adelle Street, controlling vehicle movements at the site entrance with flag personnel and signage, keeping road surfaces free of spilled material, and repairing any damage to municipal roads caused by construction vehicles.

Operational phase

The Transport Impact Assessment estimates that the residential units will generate the same number of vehicle trips in each of the weekday morning and afternoon peak hours. Under the 2031 total traffic scenario, the Main Road; Industria Road; Argonauta Avenue intersection will operate at LOS B in the morning peak and LOS C in the afternoon peak, and the new site access on Adelle Street will operate at LOS A. During the 30th highest hour, which represents the Easter peak holiday season, the Main Road intersection approaches capacity (LOS E) for short periods. The TIA notes that this reflects seasonal holiday traffic typical of coastal towns, and that an upgrade is

not justified. The TIA concludes that the transport impact of the development will be **low**. No external road upgrades are required, and the development is supported from a transport engineering perspective.

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

The proposed development will provide serviced residential land in Struisbaai, which functions as a retirement and holiday town. It will create short-term construction employment for semi-skilled and low-skilled local workers, support local building trades and suppliers, and generate long-term indirect employment in domestic, garden, property management and security services. Once registered, the erven will broaden the municipal rates base.

The development will connect to existing municipal infrastructure, and the developer will pay development charges and bulk service contributions to the Cape Agulhas Municipality.

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

Local employment during construction

The applicant will require its appointed civil contractor to give preference to labour recruited from Struisbaai and the wider Cape Agulhas municipal area, including Struisbaai Noord, for all unskilled and semi-skilled positions.

Procurement from local contractors and suppliers

Wherever practicable, the applicant will procure goods, materials and services from local businesses, including building suppliers, plant hire companies, transport operators and small, medium and micro enterprises (SMMEs).

Employment opportunities in the operational phase

Once the development is occupied, the homeowners' association (HOA) will be encouraged to appoint local service providers for estate maintenance, landscaping and security. Individual property owners will create further opportunities in domestic work, gardening and home maintenance.

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 is not expected to have significant long-term impacts on the health and well-being of surrounding residents. The impacts that are likely will occur mainly during the construction phase. They are temporary and can be mitigated through the measures in the Environmental Management Programme (EMPr).

Noise and vibration

Earthworks, excavation into calcrete, the operation of plant and vehicles, and the construction of dwellings will generate noise and vibration. Residents of Ocean View Heights and other properties adjoining Erf 3495 are the receptors most likely to be affected. These impacts will be temporary and intermittent. The EMPr restricts construction to normal working hours, requires machinery to be kept well maintained, and requires neighbours to be notified in advance of particularly noisy activities. Once the development is operational, noise levels will be typical of a low-density residential neighbourhood and consistent with the surrounding area.

Dust and air quality

Vegetation clearance, earthworks and vehicle movement on exposed sandy soils may generate dust, particularly in windy conditions.

Odours

No significant odours are expected. The development will connect to the existing municipal gravity sewer network, and no on-site wastewater treatment or conservancy tanks are proposed. During construction, odours from portable sanitation facilities and stored waste will be prevented through regular servicing and the removal of waste to a licensed facility, as required by the EMPr.

Visual character and sense of place

The development will change the site from undeveloped vegetated land to residential use. This will alter the views and the sense of place experienced by adjacent residents. Because the property lies within the urban edge and adjoins existing residential development, the change is consistent with the established settlement pattern of Struisbaai and with the CAMSDF (2022–2027). The VIA rates the visual sensitivity of the adjoining residents as High, and the visual intrusion as High from Viewpoint 1 (Noreen Street) and Moderate to High from Viewpoint 2 (Adelle Street). These effects are to be mitigated through a planted buffer of naturally occurring species along the erf edges facing the existing houses on Noreen Street and Adelle Street, and through the verification of the southern double storey zone (Erven 10 to 16 and 79) by visual simulation.

Traffic

Construction vehicles and heavy deliveries will increase traffic on local roads during construction, with associated nuisance and safety risks.

Lighting

Street and household lighting will add to night-time light levels. The architectural guidelines will require lighting to be directed downwards and shielded to limit light spill onto adjacent properties and natural areas.

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 site alternative.

The property, Erf 3495, Struisbaai, is the only property under consideration for the proposed Bella Vista Residential Development, and no alternative properties were assessed. The proposal is specifically associated with this land parcel, which is held by the applicant and which the Cape Agulhas Municipality has identified for future residential expansion. No alternative sites or properties were investigated and assessed for this proposal.

The subject property is approximately 12.22 ha in extent and is situated on the western side of Adelle Street, at the edge of the existing built-up area of Struisbaai. It is bounded by existing residential development to the south and east, the municipal water reservoirs and Noreen Street to the south, and the undeveloped Remainder of Farm Paapekuilsfontein No. 281 to the west and north. The property was included within the Struisbaai Urban Edge. The Cape Agulhas Municipality Spatial Development Framework (CAMSDF), 2022–2027, places it well within the Urban Edge and identifies it for future residential development (**Figure 17).** The proposed land use for rezoning and subdivision for residential development is therefore consistent with the Municipality's adopted spatial planning

policy. It also supports the CAMSDF objective of directing urban growth to land inside the Urban Edge rather than to peripheral greenfield areas.

Because the property lies inside the demarcated Urban Edge and next to established residential neighbourhoods, the development can be served by existing municipal civil infrastructure in its immediate vicinity. The Cape Agulhas Municipality confirmed in a letter dated 3 October 2025 that municipal water and sewer services are available for the development. Specifically:

- **Water:** the development will connect to the existing 160 mm municipal watermain along Adelle Street.
- **Sewer:** sewage will drain by gravity, with no pumping required, into the existing municipal sewer system at Adelle Street and the Ocean View Heights network.
- **Stormwater:** stormwater will be attenuated on site and discharged to the existing municipal system in Adelle Street, whose attenuation ponds at Ocean View Heights were designed to accept flow from the property.
- **Roads:** access will be taken from a new access road off Adelle Street.

Bulk services will therefore not need to be extended beyond the Urban Edge into the surrounding areas, which are predominantly covered by intact natural vegetation. This avoids the further clearance of vegetation, habitat fragmentation and associated ecological impacts that new service corridors through undeveloped land would cause.

The property is covered by Agulhas Limestone Fynbos, as mapped in the National Vegetation Map (2024). This vegetation type is listed as Critically Endangered in the Revised National List of Ecosystems that are Threatened and in need of Protection (Government Gazette No. 47526 of 2022). Almost the entire property is also mapped as a Critical Biodiversity Area 1 (CBA1; terrestrial) in the Western Cape Biodiversity Spatial Plan (2023), and the CAMSDF itself records that the site falls within a Critical Biodiversity Area. The loss of this vegetation within the development footprint is acknowledged as an unavoidable negative impact of the proposal. It is assessed in detail in the Botanical and Terrestrial Biodiversity Impact Assessment and the Terrestrial Animal Species Specialist Assessment.

Notwithstanding the ecological sensitivity of the site, its location within the Urban Edge makes residential development more appropriate here, from a spatial planning perspective, than development outside the defined urban area. The property is therefore considered a suitable site for the proposed residential development, subject to the findings of the specialist assessments and the implementation of appropriate measures to avoid, minimise and mitigate environmental impacts.

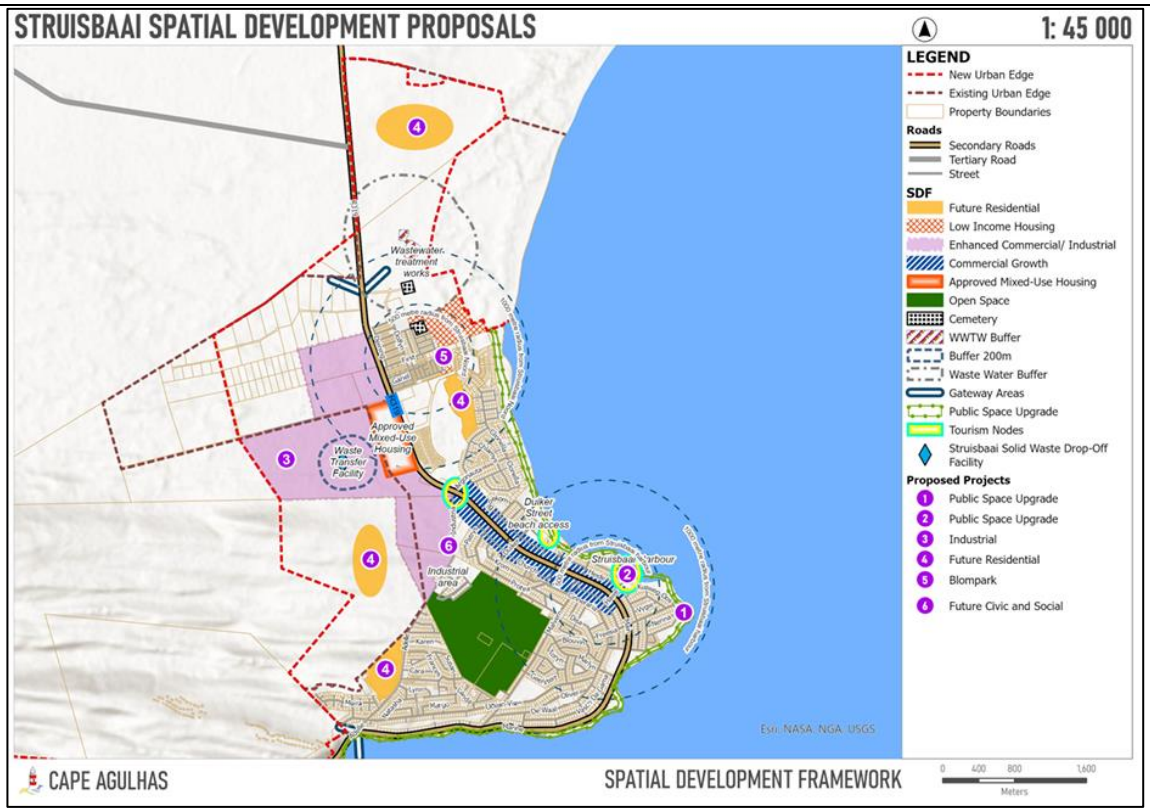


Figure 17: The subject property is situated within the urban edged (CAMSDF, 2022-2027) and is marked for future residential.

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

No other property or site alternatives that have been investigated either than the current proposed site which is Erf 3495 located in Struisbaai.

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

A site selection matrix was not undertaken for the proposed development, as no alternative properties were considered reasonable or feasible. The proposal is intended to realise the development potential of Erf 3495, Struisbaai, a specific property held by the applicant. In terms of the EIA Regulations, 2014 (as amended), alternatives must be both reasonable and feasible. Assessing hypothetical alternative properties that the applicant does not hold, and that are not earmarked for residential development, would not produce such an alternative.

The choice of Erf 3495 is supported, above all, by its planning status. The property lies well within the Struisbaai Urban Edge and is identified for future residential development in the Cape Agulhas Municipality Spatial Development Framework (CAMSDF), 2022–2027. The proposed land use is therefore consistent with the Municipality's adopted spatial planning policy. It also supports the CAMSDF objective of accommodating residential growth on land inside the Urban Edge rather than on peripheral greenfield land. The surrounding land outside the Urban Edge, including the adjoining Remainder of Farm Paapekuilsfontein No. 281, is largely intact natural habitat and is mapped as a Critical Biodiversity Area 1 (CBA1). That land links Struisbaai to the protected areas of Agulhas National Park. Residential development there would be less appropriate, in both planning and ecological terms, than on a property already inside the Urban Edge and next to existing development.

The property adjoins established residential neighbourhoods. The Cape Agulhas Municipality confirmed on 3 October 2025 that municipal water and sewer services are available for the development, and the development will connect to the existing water, sewer, stormwater and road networks in Adelle Street. Bulk service infrastructure will therefore not need to be extended beyond the Urban Edge. This avoids the vegetation clearance, habitat

fragmentation and associated ecological impacts that new service corridors through the intact natural vegetation around Struisbaai would cause.

For these reasons, Erf 3495 is considered the only reasonable and feasible property for the proposed development.

The principal negative impact associated with the property is the loss of Critically Endangered Agulhas Limestone Fynbos within the development footprint. It has been addressed through layout alternatives rather than property alternatives. In the preferred layout (Alternative 2), development is confined to the southern portion of the property. The northern 3.96 ha (32.7% of the property) is retained as a Nature Conservation Area (Erf 80), which remains connected to the natural habitat on RE/281. Compared with Alternative 1, this layout avoids an additional 1.9 ha of natural vegetation and keeps the retained habitat as a single connected block rather than an isolated strip. It also keeps development off the steep, highly visible northern slope. For these reasons, the botanical, faunal and heritage specialists all identified Alternative 2 as the preferred layout.

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

The preferred layout for Erf 3495 was reached through an iterative process. The environmental and heritage sensitivities of the site were first identified by specialists, and the layout was then revised to respond to their findings, following the mitigation hierarchy: avoid impacts first, then minimise them, then address residual impacts. The process is described below in the order in which it took place.

Identifying the sensitivities of the site before a layout was prepared

Before a site development plan was drawn up, the National Web-based Environmental Screening Tool was used to identify the site's environmental sensitivities. The property was rated Very High for terrestrial biodiversity and palaeontology, and High for plant species and animal species.

The botanical specialist surveyed the property in December 2022 and November 2023. He prepared a Botanical Assessment in February 2024. This confirmed that the whole property is covered by Critically Endangered Agulhas Limestone Fynbos, almost entirely mapped as a Critical Biodiversity Area 1 (CBA1). It also confirmed that the property supports the Endangered *Mimetes saxatilis* and other limestone-endemic species of conservation concern. Because that assessment came before any layout was prepared, its findings were available to the project team from the start of the planning process.

A Notification of Intent to Develop was also submitted to Heritage Western Cape (HWC Case No. HWC23083108MS0904). In response, HWC required a Heritage Impact Assessment that includes a Palaeontological Impact Assessment and a Visual Impact Assessment of the cultural landscape. The PIA (Mr J. Pether) was first completed in August 2023 on the basis of a preliminary site development plan. That plan already confined about 72 residential erven to the southern, wider part of the property.

Site Development Plan Proposed

Alternative 1 – Non-Preferred

Alternative 1 was initially proposed as one of the development site development plans for the project. This layout provides 84 single residential erven, with public streets and open space. It kept a Nature Conservation Area (Erf 80) of 2.06 ha (16.9% of the property) as a diagonal band across the centre of the site, with residential erven on both sides, including Erven 83 to 95 on the steep northern slope. About 10.16 ha (83% of the property) would have been cleared or transformed. This alternative layout was assessed by the appointed specialists, none of whom supported it. From a botanical perspective, the botanist found that it would cause High Negative residual impacts on Critically Endangered vegetation, the CBA1 and *Mimetes saxatilis*. He also found that the retained conservation area, as a narrow band enclosed by houses, was unlikely to stay ecologically functional.

From a faunal perspective on the other hand, the faunal specialist found that its larger footprint would cause substantially greater habitat loss and fragmentation, with High Negative residual impacts. The Heritage Impact Assessment and the Visual Impact Assessment on the other hand found that this alternative layout would place houses on the steep northern slope, which is the most visible part of the site, and halve the conservation area. They rated its operational visual impact as of high adverse significance.

Alternative 2 (Preferred)

Alternative 2 on the other hand is the preferred layout brought forward for the proposed residential development. The northern residential erven (Erven 83 to 95) were removed from the steep northern slope, and the residential component was reduced to 72 single residential erven, confined to the southern part of the property. The Nature Conservation Area (Erf 80) was nearly doubled, to 3.96 ha (32.7% of the property), and reshaped into a single block covering the whole northern part of the site. It adjoins the natural habitat on the Remainder of Farm Paapekuilsfontein No. 281 (RE/281) along the western and northern boundaries, so it remains part of the wider natural landscape rather than becoming an isolated patch.

The development footprint was reduced to about 8.15 ha (67% of the property), avoiding a further 1.9 ha of natural vegetation compared with Alternative 1. The two 10 m municipal pipeline servitudes were kept as open space, which also act as view corridors through the development.

Table 5: Summary of the proposed development components.

	Alternative 1 layout	**Alternative 2 (Preferred)**
Residential erven	84	72
Development footprint	10.16 ha (83 %); Erf 80 retained: 2.06 ha	8.15 ha (67%); Erf 80 retained: 3.96 ha
Shape of retained habitat	Narrow band enclosed by houses	Single block joined to RE/281
Development on the northern slope	Yes	No
Botanical residual impact	High Negative	Medium Negative
Faunal residual impact	High Negative	Medium Negative
Operational visual impact	High adverse	Low – Moderate negative

Design controls to minimise impacts within the layout

To reduce the remaining impacts within the preferred footprint, the following design controls were prepared alongside Alternative 2.

The Architectural Guidelines respond to the HIA and VIA:

- the central erven on the ridge are limited to a single storey, and double storeys are restricted to the northern and southern edges, subject to verification through visual simulations;

- building platforms are capped at 1.0 m above natural ground, and coverage is limited to 50%;

- houses must be simple, low, pitched-roof coastal buildings in a muted palette, with dark matt roofs and minimal, shielded lighting.

The Landscape Site Development Plan provides for a green street network and visually open boundaries along Erf 80. Its plant palette is to be revised to locally indigenous species, as required by the VIA and the botanical specialist.

The Civil Engineering Roads and Services Report confirmed that the development can connect to existing municipal water, sewer, stormwater and road networks in Adelle Street. No bulk services therefore need to be extended into the surrounding natural vegetation.

Addressing the residual impacts at landscape scale

Even under Alternative 2, the permanent loss of about 8.15 ha of Critically Endangered fynbos remains a Medium Negative residual impact. On-site measures cannot reduce it further. The botanical specialist therefore carried out a further spring survey in October 2026, and both the botanical and faunal assessments were updated to consider the Paapekuilsfontein Conservation Master Plan. The Master Plan proposes about 327 ha of conservation areas on RE/281, joined to Erf 80 and extending towards Agulhas National Park.

The botanical specialist supports the Master Plan as the appropriate way to address the residual impacts of Alternative 2, provided that five conditions are met:

- the conservation areas are legally secured in perpetuity;

- they are managed under a funded management plan;

- they are explicitly mapped and verified in the field;

- they are secured before, or at the same time as, the habitat loss on Erf 80's neighbouring development footprint;

- they are shown to be adequate for all the developments in the Master Plan.

If the conservation areas are not secured, a separate biodiversity offset for Erf 3495 would be required.

The faunal specialists also assessed the estate's security fencing. They recommended that the fence enclose the houses only, leaving Erf 80 open to the surrounding natural area. The PIA was updated in Novemver 2026 to assess Alternative 2 and confirmed that the change in layout does not affect its recommendations. The Fossil Finds Procedure is included in the EMPr.

The No-Go alternative

The No-Go alternative, which leaves the property undeveloped, was assessed by all the specialists. It avoids the direct loss of habitat, but it is not an active conservation scenario. Without a responsible party to manage the site, the existing invasion by rooikrans and other alien trees, the woodcutters' debris and the long absence of fire would continue to degrade the fynbos.

Conclusion

Through this process, Alternative 2 emerged as the preferred alternative. It reflects avoidance of the most sensitive and visible part of the site, a reduced and compact footprint, retention of a connected conservation area, and design controls that keep the development low and in keeping with Struisbaai's character. The botanical, faunal and heritage specialists all identify it as the preferred layout, subject to the implementation of their mitigation measures and the securing of the landscape-scale conservation areas.

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

No property or site alternatives other than Erf 3495, Struisbaai, were investigated for the proposed Bella Vista Residential Development. Alternative properties are not considered reasonable or feasible, for the reasons set out below.

The proposal is property-specific

The development is proposed by the registered owner of Erf 3495, to realise the development potential of that property. It is not a land use that the applicant could pursue on any parcel of their choosing. The applicant does not own or control other land in Struisbaai suitable for a residential development of comparable scale. Alternative properties would therefore not be available to the applicant and assessing them would not identify a reasonable or feasible alternative.

Consistency with the municipal spatial planning framework

Erf 3495 lies within the urban edge of Struisbaai and is designated for future residential development in the Cape Agulhas Municipality Spatial Development Framework (CAMSDF, 2022–2027). The CAMSDF is the municipality's adopted policy on where urban growth should take place. In terms of that policy, the property has been identified as suitable for residential development. Any alternative property outside the urban edge would conflict with the CAMSDF and with the principles of spatial efficiency and sustainability in the Spatial Planning and Land Use Management Act (SPLUMA, Act 16 of 2013). An alternative property would therefore be unlikely to receive land use approval.

Containment of urban growth

The property is a greenfield parcel inside the urban edge and adjoins established residential neighbourhoods, including Ocean View Heights. Developing it supports a compact settlement form and reduces pressure to expand residential development onto greenfield land beyond the urban edge. In the Struisbaai area, such land is predominantly covered by natural coastal fynbos vegetation.

Use of existing municipal infrastructure

Because the property is within the urban edge and close to existing development, it can be connected to the existing municipal water, sewerage, stormwater, electrical and road networks. Bulk services will not need to be extended beyond the urban edge. The vegetation clearance, habitat fragmentation and associated ecological impacts that new service corridors would cause outside the settlement boundary are therefore avoided.

Low agricultural value

The Agricultural Compliance Statement prepared by SoilZA confirms that the property has low agricultural sensitivity and very limited production potential. Developing it will not result in a meaningful loss of agricultural land or production.

Impacts addressed through layout alternatives

The principal negative environmental impact of developing the property is the loss of Agulhas Limestone Fynbos, a Critically Endangered vegetation type, within the development footprint. This impact is acknowledged. It has been

addressed through layout alternatives assessed on the property itself rather than through property alternatives. The preferred layout (Alternative 2) confines development to the southern portion of the property and excludes the northern portion.

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

Positive impacts

- → Residential growth is directed to a greenfield property within the Struisbaai urban edge, consistent with the CAMSDF (2022–2027). This supports a compact settlement form and reduces pressure on greenfield land outside the urban edge.
- → Existing municipal water, sewerage, stormwater, electrical and road infrastructure can be used, which avoids extending bulk services into intact natural vegetation outside the urban edge.
- → The preferred layout (Alternative 2) excludes the northern portion of the property from development, so part of the Agulhas Limestone Fynbos on site is retained.
- → No meaningful agricultural land or production is lost, as the property has low agricultural sensitivity and very limited production potential (SoilZA, 2026).
- → Short-term direct employment will be created for local contractors and low-skilled and semi-skilled labourers during the civil works and dwelling construction phases.
- → Long-term indirect employment will be created in domestic services, garden maintenance, property management, estate security, and local retail and service businesses.
- → Serviced, full-title residential land will be supplied in response to documented market demand and semigration into Struisbaai.
- → The municipality will receive development charges and service connection fees, and its rates base will expand once the 72 residential erven are registered.
- → Alien invasive vegetation on the property and in any retained areas can be managed and controlled through the EMPr, where this is required as a condition of authorisation.

Negative impacts

- → Agulhas Limestone Fynbos, a Critically Endangered vegetation type, will be permanently lost within the development footprint, together with any associated species of conservation concern identified by the botanical specialist.
- → Faunal habitat will be lost and fragmented. Slow-moving fauna (for example reptiles and tortoises) may be killed during vegetation clearance and earthworks, and fauna may be displaced from the site.
- → The retained northern portion and adjacent natural areas may be degraded by edge effects, including trampling, dumping, the spread of alien invasive species, the escape of garden plants, predation by domestic pets, and altered fire regimes.
- → Construction will cause dust, noise and vibration, affecting adjacent residents of Ocean View Heights and surrounding properties.
- → Construction traffic and heavy vehicles will use local roads, with associated safety and nuisance effects.
- → Soil erosion and sedimentation may occur during earthworks on the sandy, calcrete-underlain soils, particularly before stormwater infrastructure has been installed.
- → Hardened surfaces will increase stormwater runoff, which may cause erosion or concentrated discharge if it is not adequately managed.
- → The development will place additional demand on municipal bulk water supply, wastewater treatment and solid waste capacity.
- → The undeveloped site will change visually to a residential character, with possible effects on views from adjacent properties. These effects are partly mitigated by the single-storey height restriction on 45 central erven, and by the verification of the double-storey zones on the 27 edge erven through visual simulation.
- → Palaeontological or archaeological material may be disturbed during excavation into the underlying calcareous deposits, subject to the findings of the Palaeontological Impact Assessment (PIA).

→ Construction waste and spoil will be generated, and fuels, cement and hydrocarbons may be spilled during construction.

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

Provide a description of the preferred activity alternative.

No alternative activities were proposed or assessed for Erf 3495. The proposal relates solely to the development of residential erven. This is consistent with the property's designation for future residential development in the Cape Agulhas Municipality Spatial Development Framework (CAMSDF, 2022–2027). The proposal involves the subdivision of the subject property into 72 single residential erven ranging in size from approximately 617.3 m^2 to 1663.3 m^2. Each erf will accommodate one freestanding dwelling.

Provide a description of any other activity alternatives investigated.

No other activity alternatives were investigated for Erf 3495. Residential development is the only activity proposed. It is the land use for which the property has been designated in the Cape Agulhas Municipality Spatial Development Framework (CAMSDF, 2022–2027).

Provide a motivation for the preferred activity alternative.

Residential development is considered the most appropriate activity for Erf 3495, for the following reasons.

Consistency with spatial planning policy

The Cape Agulhas Municipality Spatial Development Framework (CAMSDF, 2022–2027) designates Erf 3495 for future residential development. The proposed activity therefore implements the municipality's adopted spatial policy for Struisbaai. It supports the CAMSDF objective of accommodating urban growth within the urban edge, as well as the principles of spatial efficiency and sustainability in the Spatial Planning and Land Use Management Act (SPLUMA, Act 16 of 2013).

Compatibility with surrounding land uses

The property adjoins established residential neighbourhoods, including Ocean View Heights. A single residential development is compatible with the existing character, density and land use pattern of the surrounding area. The binding architectural guidelines and the single-storey restriction on 45 central erven will help the development fit with neighbouring properties and partly retain existing coastal view lines through the two pipeline servitude corridors.

Response to housing demand

Struisbaai is the largest coastal settlement in the Cape Agulhas Municipality. It experiences sustained demand for residential land, driven by semigration from inland provinces and by its role as a retirement, second-home and holiday destination. The proposed 72 serviced single residential erven respond directly to this market demand.

Efficient use of existing infrastructure

The property can be connected to the existing municipal water, sewerage, stormwater, electrical and road networks next to it. Existing infrastructure will therefore be used efficiently, and bulk services will not need to be extended beyond the urban edge into areas of intact natural vegetation.

Limited suitability for other land uses

The Agricultural Compliance Statement confirms that the property has low agricultural sensitivity and very limited production potential, so agricultural use is not viable. Commercial, industrial or tourism uses would not be consistent with the CAMSDF designation or with the residential character of the area.

Socio-economic benefits

The activity will create short-term construction employment for local low-skilled and semi-skilled workers. It will also create long-term indirect employment in household, maintenance, security and local retail services. The municipality will receive development charges and service connection fees, and its rates base will expand once the new erven are registered.

Provide a detailed motivation if no activity alternatives exist.

No activity alternatives other than residential development are considered reasonable or feasible for Erf 3495. Appendix 1 of the EIA Regulations, 2014 (as amended), requires that the absence of alternatives be motivated, and the motivation is set out below.

The activity is determined by the municipal spatial designation

The Cape Agulhas Municipality Spatial Development Framework (2022–2027) designates Erf 3495 for future residential development within the Struisbaai urban edge. Residential use is the land use that the municipality has identified for the property through its spatial planning process. An application for any other land use would conflict with the CAMSDF and would be unlikely to receive land use approval in terms of SPLUMA (Act 16 of 2013) and the Cape Agulhas Municipal Land Use Planning By-law.

Agricultural use is not viable

The Agricultural Compliance Statement confirms that the property has low agricultural sensitivity and very limited production potential, owing to its shallow sandy soils, underlying hardpan calcrete and climatic constraints. Agriculture is therefore not a viable alternative use of the property.

Other land uses are not compatible with the surrounding area

The property is bordered by established residential neighbourhoods, including Ocean View Heights. Industrial use would be incompatible with these adjacent residential areas. Commercial use is directed by the CAMSDF to designated nodes and corridors rather than to the residential expansion area. Large-scale tourism accommodation would introduce traffic, noise and activity patterns inconsistent with the residential character of the area. None of these uses would be consistent with the CAMSDF designation.

Conservation of the whole property is not feasible as an activity alternative

The property supports Agulhas Limestone Fynbos, a Critically Endangered vegetation type. However, it is privately owned, lies within the urban edge, and is designated for development. The landowner does not propose the conservation of the whole property. The conservation value of the property has been addressed by excluding the northern portion from development under the preferred layout (Alternative 2), which keeps part of the vegetation on the property.

The activity responds to documented demand

Struisbaai experiences sustained demand for residential land, driven by semigration and by its role as a retirement, second-home and holiday destination. Single residential development responds directly to this demand, which an alternative land use would not meet.

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

No activity alternatives have been investigated besides the proposed development of the Bella Vista Residential development.

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

Provide a description of the preferred design or layout alternative.

The preferred layout is Alternative 2. Under this layout, the Bella Vista Residential Development is confined to the southern and central portions of Erf 3495, and the steeper northern portion of the property is excluded from development (**Figure 18**). The development footprint covers approximately 81 529.7 m^2 (8.15 ha) and comprises:

- the residential erven (63 869.3 m^2);
- the private internal roads (11 666.5 m^2);
- private open space (6 160.4 m^2).

The remaining 39 600.3 m^2 (3.96 ha) in the north is retained as a Nature Conservation Area. Based on the total of 121 130 m^2 in the layout's zoning table, the development footprint makes up approximately 67.3% of the property and the conservation area approximately 32.7%. The registered deed extent of the property is 122 244 m^2 (12.22 ha).

The layout provides for 72 single residential erven, ranging from approximately 617 m^2 to 1 663 m^2 in extent. The erven are served by an internal private road network. Erf 72 forms the main loop road through the development. Access is taken from Adelle Street.

Six private open space erven (Erven 73 to 78) are distributed through the development. The two 10 m municipal pipeline servitudes that cross the property lie over Erven 73 to 77 plus Erf 80, so these servitudes are kept free of residential development. They also act as green corridors and view lines through the estate. The remaining open space erven provide smaller green links and buffers within the layout.

To keep the development low and in keeping with the character of Struisbaai, the layout includes height zones. The central erven, which straddle the broad crest of the site, are limited to a single storey. Double storeys are permitted only on the northern and southern edges. The residential area is consolidated next to the existing residential edge of Struisbaai along Adelle Street and Noreen Street, rather than extending onto the steep northern slope.

Erf 80 will be set aside as a Nature Conservation Area, covering the steeper northern portion of the property. This area slopes down towards, and borders, the Remainder of Farm Paapekuilsfontein No. 281 along the western and northern boundaries. As a result, Erf 80 remains part of the wider natural landscape rather than becoming an isolated patch within the estate. The landowner has indicated that Erf 80 will be kept as natural habitat, cleared of invasive alien vegetation and restored with locally indigenous vegetation as part of the environmental management of the development. Erf 80 is also intended to form part of the broader conservation network proposed for the Paapekuilsfontein landholding under the Paapekuilsfontein Conservation Master Plan, as described in the specialist assessments.

Moreover, Alternative 2 is supported by the faunal, botanical and heritage specialists as the preferred layout for the proposed development. From a faunal perspective, Alternative 2 is identifies as the preferred alternative because it has a substantially smaller development footprint than Alternative 1, concentrates development adjacent to the existing urban edge and retains the northern portion of the property as a conservation area. This conservation area maintains ecological connectivity with the wider Paapekuilsfontein landholding. Under Alternative 1, residual impacts on faunal habitat, ecological connectivity and the habitat of species of conservation concern remain High Negative, even after mitigation. Under Alternative 2, these impacts are reduced to Medium Negative with mitigation.

The specialists further recommend that the estate's security fencing enclose only the residential component, allowing Erf 80 to remain connected to the adjoining natural habitat.

Similarly, the Botanical and Terrestrial Biodiversity Impact Assessment identifies Alternative 2 as the preferred layout from a botanical perspective. The reduced development footprint and enlarged conservation area reduce the residual impacts on Critically Endangered Agulhas Limestone Fynbos and *Mimetes saxatilis* from High Negative under Alternative 1 to Medium Negative under Alternative 2.

From a heritage and visual perspective, the Heritage Impact Assessment supports Alternative 2 because it excludes development from the steep and highly visible northern slope. Retaining this portion of the property as an open conservation area reduces the visual intrusion of the proposed development and helps maintain the character and sense of place of the wider Agulhas cultural landscape.

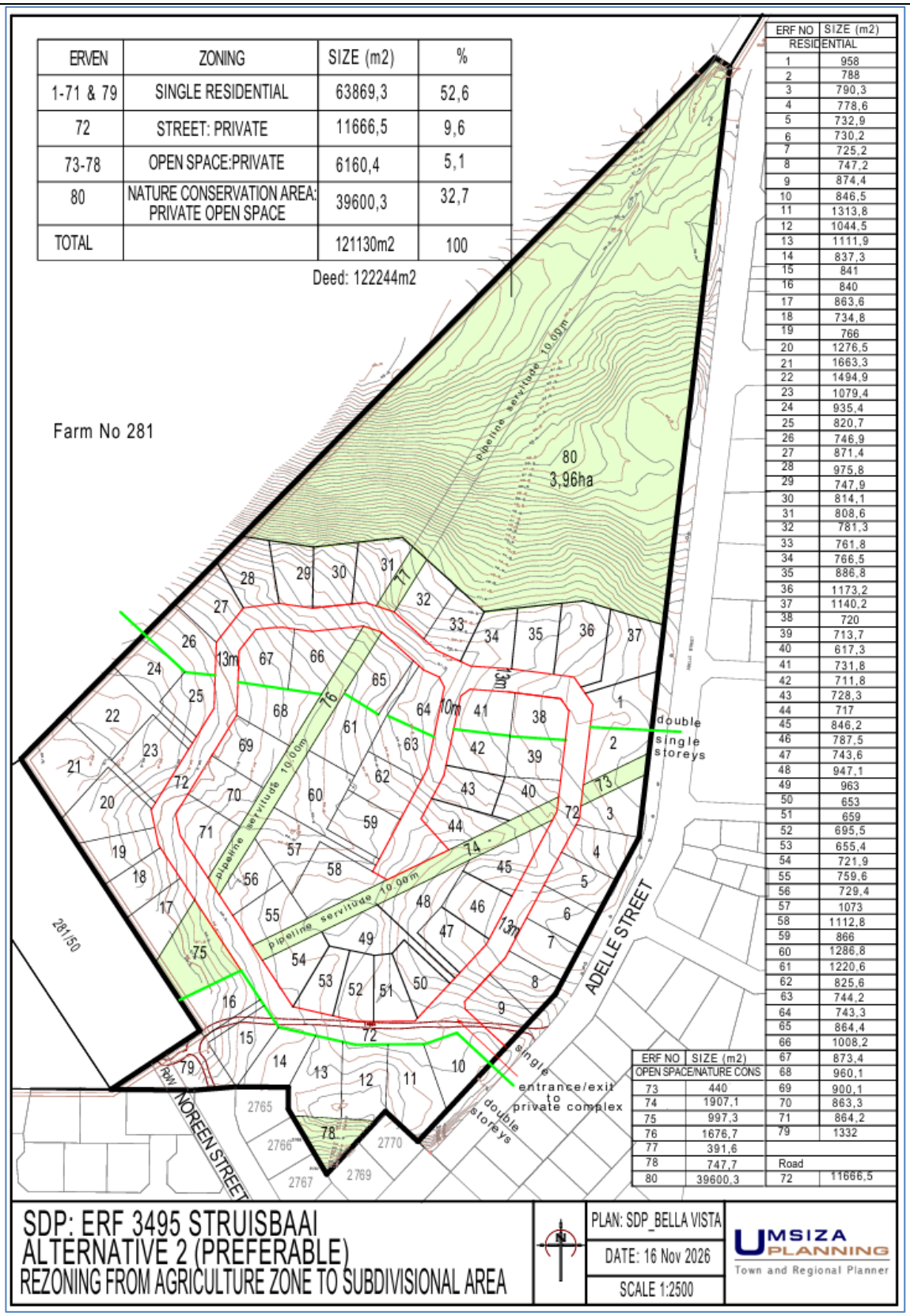


Figure 18: The preferred layout (Alternative 2).

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

Alternative 1 – Non-Preferred layout

Alternative 1 was the initial layout investigated for the proposed development (**Figure 19).** Under this layout, development extends across both the southern and the northern portions of Erf 3495.

Alternative 1 provides for 84 single residential erven. Erven 1 to 71 are located in the southern portion of the property and are configured in the same way as under the preferred Alternative 2. Thirteen additional erven (Erven 83 to 95) form a separate residential cluster in the northern portion of the property. This northern cluster is served by an extension of the internal public road network (Erven 81 and 82). The public road network therefore comprises Erven 72, 79, 81 and 82, and public open space is provided on Erven 73 to 78 and Erf 96. The Nature Conservation Area (Erf 80) is reduced to a strip of approximately 20,630.5 m^2 (2.06 ha) lying between the southern and northern residential clusters.

The development footprint under Alternative 1 covers approximately 101,613.5 m^2 (10.16 ha), or approximately 83.1% of the property, and the Nature Conservation Area approximately 16.9%. These figures are based on a total extent of 122,244 m^2 (12.22 ha), as indicated on the Site Development Plan. The land-use budget for Alternative 1 is set out in **Table 1** below.

Table 6: Proposed development footprint (Alternative 1).

Erven	**Zoning**	**Extent (m^2)**
1-71; 83-95	Single Residential	76 745.1
72, 79, 81, 82	Street	16,531.8
73–78, 96	Open Space: Public	8336.6
80	Nature Conservation Area	20630.5
Total:		122 244

Alternative 1 has a development footprint of approximately 2 ha larger than that of Alternative 2. Therefore, this Alternative layout, if it would have been preferred would result to greater loss of the Critically Endangered vegetation type as well as greater loss of terrestrial biodiversity within the mapped Critical Biodiversity Area (CBA1; terrestrial). The northern residential cluster (Erven 83 to 95) extends development into the undeveloped northern portion of the property, which adjoins the wider Paapekuilsfontein landholding. This would extend edge effects, such as lighting, noise, domestic animals and human disturbance, further into adjoining natural habitat.

Moreover, Alternative 1 incorporates the Nature Conservation Area which is approximately half the extent of that under Alternative 2 (2.06 ha compared with 3.96 ha). It is also confined to a strip between two residential clusters, which limits its ability to function as a connected area of natural habitat. The Terrestrial Animal Species Specialist Assessment (Venter & Swart, 2026) found that the more extensive clearing under Alternative 1 would remove most faunal corridors on the property and leave only narrow or isolated remnants of natural habitat. Impacts on faunal landscape connectivity and on the habitat of Species of Conservation Concern were rated High Negative under Alternative 1 in all phases of the development, and these ratings were not reduced by mitigation. The specialist accordingly identified Alternative 1 as the non-preferred alternative.

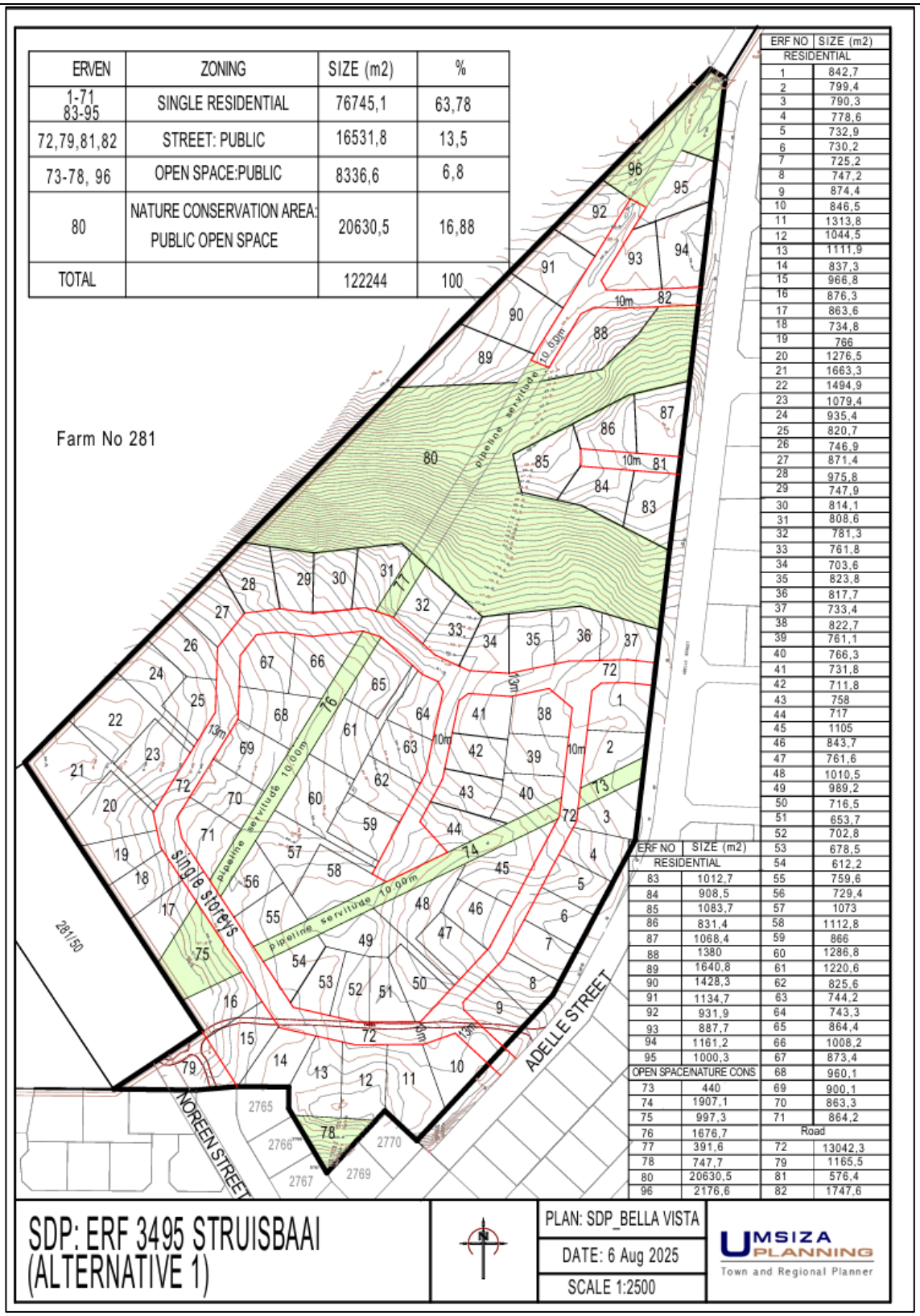


Figure 19: Alternative 1 SDP.

No-go

The No-Go alternative entails the proposed residential development not proceeding. Under this alternative, Erf 3495 would remain in its current state as vacant, undeveloped land on the south-western edge of Struisbaai. The 72 residential erven, the internal road network and the private open space would not be established. Erf 80 would not

be formally designated and managed as a Nature Conservation Area, and the property would not be incorporated into the conservation network proposed under the Paapekuilsfontein Conservation Master Plan.

The No-Go alternative would avoid the direct loss of Critically Endangered Agulhas Limestone Fynbos and of faunal habitat associated with the development footprint. The Terrestrial Animal Species Specialist Assessment rates the No Development option as Medium to Low Negative for habitat loss and degradation, Low Negative for fragmentation and Medium to Low Negative for operational degradation, because no management commitment would exist under this option. The property is currently affected by invasive alien vegetation, principally *Acacia cyclops* and *Acacia saligna*, which the faunal specialist recorded as denser and taller in the northern sections of the property. In the absence of a development that funds and secures active management, the spread of invasive alien vegetation is likely to continue. This would progressively degrade the ecological condition of the Agulhas Limestone Fynbos and the faunal habitat it supports and would reduce the conservation value that the No-Go alternative seeks to protect.

Under the preferred Alternative 2, by contrast, the northern of approximately 3.96 ha of the property will be retained as Erf 80, cleared of invasive alien vegetation and restored with locally indigenous vegetation. It will be managed for conservation and linked to the wider Paapekuilsfontein conservation network. The No-Go alternative would therefore forgo the opportunity to secure, rehabilitate and manage this portion of the property, and to integrate it into a landscape-scale conservation framework extending towards the Agulhas National Park.

The No-Go alternative would also forgo the socio-economic benefits associated with the proposed development. These include the provision of 72 residential erven adjacent to an established residential area of Struisbaai, short-term employment and business opportunities during the construction phase, and long-term municipal revenue through property rates and service charges. The Civil Engineering Services Report and the Cape Agulhas Municipality's letter of 3 October 2025 confirm that municipal water and sewer services are available to service the development. Under the No-Go alternative, this existing infrastructure capacity adjacent to the urban edge would remain unused. With regard to palaeontological heritage, the No-Go alternative would avoid any disturbance of the Waenhuiskrans Formation. However, it would also forgo the opportunity, identified in the Palaeontological Impact Assessment (Pether, 2026), for any fossil material uncovered during excavation to be recovered and made available for scientific study under the Fossil Finds Procedure.

The No-Go alternative has been assessed as the baseline against which the development alternatives are compared, but it is not the preferred alternative. Although it would avoid the direct impacts of development, it provides no mechanism for the long-term conservation, rehabilitation and management of the natural habitat on the property. It also forgoes the residential, socio-economic and infrastructure benefits of the proposed development. The preferred Alternative 2 is considered to strike a more appropriate balance. It avoids development of the most ecologically sensitive and best-connected northern portion of the property, secures that portion for conservation and active management, and accommodates residential development at the existing urban edge where municipal services are available.

Provide a motivation for the preferred design or layout alternative.

Alternative 2 (preferred)

Alternative 2 is the preferred layout for the proposed Bella Vista Residential Development and is considered to represent the best practicable environmental option for Erf 3495. It is the outcome of a deliberate design refinement that applied the avoidance and minimisation steps of the mitigation hierarchy at the layout stage. Erf 3495 supports Critically Endangered Agulhas Limestone Fynbos and lies within an area mapped as Critical Biodiversity Area 1 (CBA1) in the Western Cape Biodiversity Spatial Plan (2023). The terrestrial faunal specialist assigned the site an overall Site Ecological Importance of High, a rating for which the SANBI (2020) guidelines require avoidance wherever possible and changes to project design that limit the extent of habitat affected (Venter & Swart, 2026). In response, Alternative 2 removes the northern residential cluster of 13 erven proposed under Alternative 1, together with the associated road extension. This reduces the development footprint by approximately 2.0 ha, from

approximately 10.16 ha to 8.15 ha, and nearly doubles the Nature Conservation Area, from approximately 2.06 ha to 3.96 ha, so that the retained portion of the property increases from approximately 16.9% to 32.7%. The loss of Critically Endangered vegetation and faunal habitat is therefore avoided over the entire northern portion of the property rather than mitigated after it has occurred.

Under Alternative 1, the Nature Conservation Area would be a narrow strip enclosed between two residential clusters. Under Alternative 2, Erf 80 is retained as a single, consolidated block of natural habitat covering the northern portion of the property. Erf 80 adjoins the wider Paapekuilsfontein landholding directly and is not separated from it by residential erven or roads. This configuration maintains a functional ecological link between retained habitat on Erf 3495 and the larger natural areas extending towards the Agulhas National Park. The faunal specialist identifies this connectivity as important both for wide-ranging species and for less mobile, habitat-dependent species such as the Southern Adder and the Scarce Mountain Copper. Erf 80 is further intended to form part of the conservation network proposed under the Paapekuilsfontein Conservation Master Plan, so that the conservation benefit of the preferred layout extends beyond the boundaries of Erf 3495 (Venter & Swart, 2026).

The Terrestrial Animal Species Specialist Assessment identifies Alternative 2 as the preferred development alternative from a faunal perspective. Under Alternative 1, impacts on faunal landscape connectivity and on the habitat of Species of Conservation Concern were rated High Negative in all phases of the development, and these ratings were not reduced by mitigation. Under Alternative 2, the same impacts were rated Medium–High Negative before mitigation and Medium Negative with mitigation. Alternative 2 is therefore the only layout assessed in which the recommended mitigation measures meaningfully reduce the significance of faunal impacts. The retention of Erf 80 also offers a net conservation gain within the retained area. The faunal specialist recorded invasive alien vegetation, principally *Acacia cyclops* and *Acacia saligna*, as denser and taller in the northern sections of the property. Under Alternative 2, Erf 80 will be cleared of invasive alien vegetation and restored with locally indigenous vegetation appropriate to Agulhas Limestone Fynbos. This will improve the ecological condition of a portion of the property that would otherwise continue to deteriorate in the absence of management.

Under Alternative 2, all 72 residential erven are located on the southern ridge crest, directly adjoining the existing residential development of Struisbaai along Adelle Street. Development is thereby contained at the existing urban edge and does not extend into the undeveloped land to the north. Edge effects associated with residential development, including artificial lighting, noise, domestic animals and human disturbance, are confined to the portion of the property already exposed to them and are kept away from Erf 80 and the adjoining natural habitat. This consolidation also makes efficient use of existing municipal infrastructure. The Civil Engineering Services Report confirms that the development can be adequately serviced from existing municipal services in Adelle Street, and the Cape Agulhas Municipality confirmed the availability of water and sewer services in its letter of 3 October 2025. Because of the ground levels on the southern portion of the property, sewage from the development will drain by gravity into the existing Ocean View Heights system, and no pumping station is required. Development of the northern portion would have required longer service runs and additional infrastructure.

Alternative 2 also protects the existing municipal servitudes on the property. Two municipal reservoir supply watermains traverse Erf 3495 within registered servitudes. These are accommodated over Private Open Space Erven 73 to 77 plus Erf 80, which keeps them free of residential development, safeguards the bulk water supply to Struisbaai and maintains access for the Municipality. With regard to palaeontological heritage, the Palaeontological Impact Assessment (Pether, 2026) assessed Alternative 2 and confirmed that the layout does not affect its findings or recommendations. Excavations will be limited to approximately 0.6 m for foundations and up to approximately 1.2 m for services, and any risk to fossil material within the Waenhuiskrans Formation will be managed through the Fossil Finds Procedure contained in the EMPr.

Alternative 2 gives effect to the national environmental management principles in section 2(4)(a) of the National Environmental Management Act (Act No. 107 of 1998), which require that the disturbance of ecosystems and the loss of biological diversity be avoided or, where they cannot be avoided altogether, minimised and remedied. The layout provides 72 residential erven adjacent to an established residential area with available municipal services.

In doing so, it balances the need for residential development in Struisbaai with the protection of the most ecologically sensitive and best-connected portion of the property. Alternative 2 avoids development of the northern portion of Erf 3495 and retains a consolidated 3.96 ha Nature Conservation Area connected to the wider Paapekuilsfontein landholding. It reduces the significance of faunal impacts to Medium Negative with mitigation, compared with High Negative under Alternative 1, and concentrates development at the existing urban edge where municipal services are available. On this basis, Alternative 2 is put forward as the preferred layout for the proposed development.

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

- → Provision of 84 single residential erven, which is the greatest residential yield of the alternatives assessed.
- → Short-term employment and business opportunities during the construction phase.
- → Long-term municipal revenue through property rates and service charges.
- → Use of existing municipal water and sewer services available in Adelle Street (Icon Consulting Engineers, 2026).
- → Retention of approximately 2.06 ha of the property (16.9%) as a Nature Conservation Area (Erf 80).
- → Opportunity for any fossil material uncovered during excavation to be recovered and made available for scientific study under the Fossil Finds Procedure (Pether, 2026).

Negative impacts

- → Permanent loss of approximately 10.16 ha (83.1%) of the property, comprising Critically Endangered Agulhas Limestone Fynbos within an area mapped as CBA1 in the Western Cape Biodiversity Spatial Plan (2023).
- → Extension of residential development, through a separate cluster of 13 erven (Erven 83 to 95), into the undeveloped northern portion of the property next to the wider Paapekuilsfontein landholding.
- → Removal of most faunal corridors on the property, leaving only narrow or isolated remnants of natural habitat. The resulting impacts on faunal landscape connectivity were rated High Negative in all phases and are not reduced by mitigation.
- → Loss and fragmentation of actual or potentially suitable habitat for animal Species of Conservation Concern, including Black Harrier, Denham's Bustard, Southern Black Korhaan, Fynbos Buttonquail, Southern Adder and Scarce Mountain Copper. These impacts were rated High Negative in all phases, with and without mitigation (Venter & Swart, 2026).
- → Confinement of the Nature Conservation Area to a narrow strip enclosed between two residential clusters, which limits its function as connected natural habitat.
- → Extension of edge effects, including artificial lighting, noise, domestic animals and human disturbance, deeper into adjoining natural habitat.
- → Longer service runs and additional road infrastructure to serve the northern residential cluster.
- → Potential loss of fossil material within the Waenhuiskrans Formation during excavation for foundations and services, over a larger area than under Alternative 2.

Alternative 2: Preferred

Positive impacts

- → Avoidance of development across the entire northern portion of the property, which reduces the development footprint by approximately 2 ha compared with Alternative 1.
- → Retention of approximately 3.96 ha (32.7%) of the property as a single, consolidated Nature Conservation Area (Erf 80), nearly double the extent retained under Alternative 1.
- → Maintenance of ecological connectivity between retained habitat on Erf 3495, the wider Paapekuilsfontein landholding and natural areas extending towards the Agulhas National Park.
- → Incorporation of Erf 80 into the conservation network proposed under the Paapekuilsfontein Conservation Master Plan which provides a landscape-scale conservation benefit.
- → Clearing of invasive alien vegetation, specifically *Acacia cyclops* and *Acacia saligna*, from Erf 80 and its restoration with locally indigenous vegetation, which will improve its ecological condition over time.
- → Provision of 72 single residential erven within the existing residential edge of Struisbaai along Adelle Street.
- → Efficient use of existing municipal infrastructure, with gravity sewer drainage into the existing Ocean View Heights system and no pumping station required.
- → Protection of the municipal reservoir supply watermain servitudes, which are kept over Private Open Space Erven 73 to 77 plus Erf 80 and free of residential development.
- → Short-term employment and business opportunities during the construction phase, and long-term municipal revenue through property rates and service charges.
- → Opportunity for any fossil material uncovered during excavation to be recovered and made available for scientific study under the Fossil Finds Procedure (Pether, 2026).

Negative impacts

- → Permanent loss of approximately 8.15 ha (67.3%) of the property, comprising Critically Endangered Agulhas Limestone Fynbos within an area mapped as CBA1.
- → Loss and fragmentation of faunal habitat and reduced landscape connectivity within the development footprint. This impact was rated Medium–High Negative before mitigation, reducing to Medium Negative with mitigation (Venter & Swart, 2026).
- → Loss of actual or potentially suitable habitat for Species of Conservation Concern within the development footprint. This impact was rated Medium–High Negative before mitigation, reducing to Medium Negative with mitigation (Venter & Swart, 2026).
- → Ongoing operational disturbance to the retained habitat in Erf 80, including artificial lighting, noise, domestic animals and human access, which will require management.
- → Potential loss of fossil material within the Waenhuiskrans Formation during excavation for foundations (approximately 0.6 m deep) and services (up to approximately 1.2 m deep). This impact is manageable through the Fossil Finds Procedure (Pether, 2026).
- → Short-term construction-phase impacts typical of residential development, including dust, noise, traffic and the generation of construction waste

No-go

Positive impacts

- → Avoidance of the direct loss of Critically Endangered Agulhas Limestone Fynbos and faunal habitat across the property.
- → Retention of existing faunal habitat and landscape connectivity across the full extent of Erf 3495. The faunal specialist rates the No Development option as Medium to Low Negative for habitat, Low Negative for fragmentation and Medium to Low Negative for operational degradation (Venter & Swart, 2026).
- → No disturbance of the Waenhuiskrans Formation and no risk of loss of fossil material.
- → No construction-phase impacts such as dust, noise, traffic or waste.

Negative impacts

→ No mechanism to secure, rehabilitate or manage the natural habitat on the property over the long term, and no designation of a Nature Conservation Area.

→ Likely continued spread of invasive alien vegetation, particularly, *Acacia cyclops* and *Acacia saligna*, in the absence of active management. This would progressively degrade the ecological condition of the Agulhas Limestone Fynbos and the faunal habitat it supports.

→ Loss of the opportunity to incorporate the property into the conservation network proposed under the Paapekuilsfontein Conservation Master Plan.

→ Forgoing the provision of 72 residential erven next to an established residential area of Struisbaai.

→ Forgoing short-term construction employment and business opportunities, and long-term municipal revenue through property rates and service charges.

→ Existing municipal water and sewer capacity available at the urban edge would remain unused.

→ Forgoing the opportunity for any fossil material within the Waenhuiskrans Formation to be recovered and made available for scientific study.

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:

No technology alternatives that have been investigated for the proposed development.

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.

N/A

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

N/A

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

Provide a description of the preferred operational alternative.

No operational alternatives have been investigated for the proposed development. The proposal is limited to the construction of a residential development comprising 72 single residential erven, internal private roads and private open space, together with the retention of the northern portion of the property as a Nature Conservation Area (Erf 80). Once construction is complete, the operational phase will consist of the normal residential occupation and use of the erven, which does not lend itself to meaningful operational alternatives.

Provide a description of any other operational alternatives investigated.

As above.

Provide a motivation for the preferred operational alternative.

As above.

Provide a detailed motivation if no alternatives exist.

No operational alternatives have been investigated for the proposed Bella Vista Residential Development. The proposal entails the establishment of 72 single residential erven, internal private roads and private open space on the southern portion of Erf 3495. This type of development is constructed using conventional, well-established building and civil engineering methods. It does not involve any industrial process, energy-generation facility or treatment plant for which alternative technologies would ordinarily be considered.

The engineering services for the development will connect to existing municipal infrastructure, so there is no reasonable or feasible alternative technology for the provision of bulk services. The Cape Agulhas Municipality confirmed in its letter of 3 October 2025 that municipal water and sewer services are available. Water will be supplied through a connection to the existing 160 mm municipal watermain along Adelle Street. Because the site lies below the Struisbaai municipal reservoirs, adequate water pressure can be provided without booster infrastructure. Sewage will be conveyed by a gravity system into the existing municipal sewer at the corner of Adelle Street and Santie Street, which drains to the Ocean View Heights sewer pump stations.

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

No operational alternatives have been investigated for the proposed development, as set out in the preceding section. The proposal is limited to the residential occupation and use of 72 single residential erven, internal private roads and private open space, together with the long-term conservation management of Erf 80.

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 entails the proposed Bella Vista Residential Development not proceeding. Under this option, Erf 3495 would remain vacant, undeveloped land on the south-western edge of Struisbaai. The No-Go option has been assessed as the baseline against which the development alternatives are compared. It is acknowledged that it would avoid the direct loss of Critically Endangered Agulhas Limestone Fynbos and faunal habitat associated with the development footprint. The No-Go option is nevertheless not considered the preferred option, for the reasons set out below.

The faunal specialist's favourable rating of the No-Go option assumes that the natural habitat on the property is conserved and appropriately managed over the long term, including through conservation stewardship and the control of fire and invasive alien vegetation. Under the No-Go option, no such management would be secured. Erf 3495 is already affected by invasive alien vegetation, particularly, the *Acacia cyclops* and *Acacia saligna*, which the faunal specialist recorded throughout the site and as denser and taller in the northern sections. Without a development that funds and secures active management, alien invasion is likely to continue. This would progressively degrade the Agulhas Limestone Fynbos and the faunal habitat it supports and would erode the conservation value that the No-Go option is intended to protect. The conservation outcome assumed for the No-Go option is therefore unlikely to be realised in practice.

By contrast, the preferred Alternative 2 secures a tangible and enforceable conservation outcome. It retains the northern 3.96 ha of the property, which is the most ecologically sensitive and best-connected portion of the site, as a designated Nature Conservation Area (Erf 80). Erf 80 will be cleared of invasive alien vegetation, restored with locally indigenous vegetation and managed for conservation in accordance with the EMPr. It will also be incorporated into the conservation network proposed under the Paapekuilsfontein Conservation Master Plan, linking retained habitat on Erf 3495 with the wider landholding and with natural areas extending towards the Agulhas National Park. The No-Go option would forgo this opportunity to secure, rehabilitate and integrate the northern portion of the property into a landscape-scale conservation framework.

The No-Go option would also forgo the socio-economic benefits of the proposed development. These include the provision of 72 residential erven next to an established residential area of Struisbaai, short-term employment and business opportunities during construction, and long-term municipal revenue through property rates and service

charges. The Cape Agulhas Municipality confirmed in its letter of 3 October 2025 that municipal water and sewer services are available. The Civil Engineering Services Report confirms that the development can be adequately serviced from existing infrastructure in Adelle Street, with gravity sewer drainage and no pumping station required. Under the No-Go option, this existing service capacity at the urban edge would remain unused. Residential demand in Struisbaai may then need to be accommodated on other land that is less well located in relation to existing infrastructure.

With regard to palaeontological heritage, the No-Go option would avoid any disturbance of the Waenhuiskrans Formation. It would, however, also forgo the opportunity identified in the Palaeontological Impact Assessment (Pether, 2026) for any fossil material uncovered during excavation to be recovered and made available for scientific study under the Fossil Finds Procedure. The palaeontological specialist confirmed that the possible presence of fossils does not, of itself, influence the decision on whether the development should proceed, provided that the Fossil Finds Procedure is implemented.

Section 2(4)(a) of the National Environmental Management Act (Act No. 107 of 1998) requires that the disturbance of ecosystems and the loss of biological diversity be avoided or, where they cannot be avoided altogether, minimised and remedied. Alternative 2 gives effect to this principle by avoiding the northern portion of the property, minimising the development footprint and providing for the remediation of retained habitat through alien vegetation clearing and restoration. The No-Go option avoids direct impacts but provides no mechanism to address the existing degradation of the property, and it forgoes the residential, socio-economic and infrastructure benefits of the development. The preferred Alternative 2 is therefore considered to strike a more appropriate balance between the conservation of the most sensitive portion of Erf 3495 and the provision of residential development at the existing urban edge, where municipal services are available. For these reasons, the No-Go option is not preferred.

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.

The alternatives assessed for the proposed Bella Vista Residential Development were developed and refined by applying the mitigation hierarchy, which requires that negative impacts first be avoided, then minimised and mitigated, and finally remedied, while positive impacts are maximised. The preferred layout (Alternative 2) is itself the outcome of this process. No further reasonable or feasible alternatives have been identified that would avoid negative impacts, mitigate unavoidable negative impacts or maximise positive impacts to a greater extent than the preferred layout, together with the mitigation measures in the Environmental Management Programme (EMPr).

The principal means of avoiding negative impacts has been the refinement of the layout from Alternative 1 to Alternative 2. The initial layout (Alternative 1) provided for 84 residential erven extending across both the southern and the northern portions of Erf 3495, with the Nature Conservation Area reduced to a narrow strip of approximately 2.06 ha between two residential clusters. In response to the sensitivity of the site, which supports Critically Endangered Agulhas Limestone Fynbos within an area mapped as CBA1 and was assigned an overall Site Ecological Importance of High by the faunal specialist, the northern residential cluster of 13 erven and its associated road extension were removed. This reduced the development footprint by approximately 2.0 ha and increased the Nature Conservation Area to a consolidated 3.96 ha (32.7% of the property) adjoining the wider Paapekuilsfontein landholding. As a result, the loss of habitat and the fragmentation of faunal corridors are avoided across the entire northern portion of the property. The faunal specialist confirmed that this refinement reduces the significance of impacts on faunal landscape connectivity and on the habitat of Species of Conservation Concern from High Negative under Alternative 1 to Medium Negative with mitigation under Alternative 2 (Venter & Swart, 2026). The layout further avoids impacts on existing infrastructure by placing the municipal reservoir supply watermain servitudes within Private Open Space Erven 73 to 78, which keeps them free of residential development.

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

Having considered the location of the site, the layout design and all the applicable guidelines and policies referred to in this report, Alternative 2 is the preferred alternative.

The preferred location of the proposed Bella Vista Residential Development is the southern portion of Erf 3495, Struisbaai, within the Cape Agulhas Municipality, Western Cape. The site is located on the south-western edge of Struisbaai and is approached from the R319 via Adelle Street. This location is preferred because it directly adjoins the existing residential edge of Struisbaai along Adelle Street, so that development is consolidated at the urban edge rather than extending into undeveloped land located outside the urban edge. It is also the portion of the property that can be serviced by gravity from existing municipal water, sewer and stormwater infrastructure, the availability of which was confirmed by the Cape Agulhas Municipality on 3 October 2025. The northern portion of the property, which is more ecologically sensitive and adjoins the wider Paapekuilsfontein landholding, is excluded from development.

The preferred design or layout alternative is Alternative 2. It provides for 72 single residential erven, internal private roads and private open space within a development footprint of approximately 8.15 ha (67.3% of the property) and retains approximately 3.96 ha (32.7%) as a consolidated Nature Conservation Area (Erf 80). Compared with the non-preferred Alternative 1, Alternative 2 removes the northern residential cluster, reduces the development footprint by approximately 2 ha and nearly doubles the Nature Conservation Area. It was identified by the faunal specialist as the preferred alternative, with impacts on faunal connectivity and on the habitat of Species of Conservation Concern reducing to Medium Negative with mitigation, compared with High Negative under Alternative 1 (Venter & Swart, 2026). The Palaeontological Impact Assessment confirms that Alternative 2 does not alter its findings, and the associated risk will be managed through the Fossil Finds Procedure (Pether, 2026).

No technology or operational alternatives were investigated, as none are reasonable or feasible for a residential development of this nature and scale. The preferred technology entails conventional construction in accordance with the National Building Regulations and SANS 10400, with connection to existing municipal services. It is supplemented by the resource-efficient measures prescribed in the Architectural Design Guidelines, including mandatory rainwater tanks, water-wise fittings and energy-efficient, shielded external lighting. The preferred operational alternative is the residential occupation of the erven, together with the long-term conservation management of Erf 80 in accordance with the EMPr and its intended incorporation into the Paapekuilsfontein conservation network.

The No-Go option is not preferred. Although it would avoid the direct impacts of development, it would provide no mechanism for the long-term conservation, alien vegetation clearing and rehabilitation of the natural habitat on the property. It would also forgo the residential, socio-economic and infrastructure benefits of the proposed development.

The preferred alternatives are therefore Alternative 2, located on the southern portion of Erf 3495, Struisbaai, implemented with conventional construction technology and existing municipal services and operated as a residential development with a managed Nature Conservation Area. These are considered to represent the best practicable environmental option for the proposed development, subject to the implementation of the mitigation measures contained in the EMPr.

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).
Erf 80, the 3.96 ha Nature Conservation Area, is identified as a no development area. Both the faunal and botanical specialists require it to be treated as a no-go area during construction and protected in perpetuity.

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.

The Preferred and Alternative site development plans a substantially similar apart from the number of units and the envisaged.

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. ECOLOGICAL/BOTANICAL** Loss of Agulhas Limestone Fynbos vegetation and Critical Biodiversity Area 1 habitat within the development footprint.
Nature of impact:	Negative
Extent and duration of impact:	Local; Permanent
Consequence of impact or risk:	Loss of CR vegetation in CBA1; retained 2.06 ha is a narrow band enclosed by erven.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	High
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	Fragmentation of the retained habitat and edge effects on it. The enclosed configuration of Erf 80 would separate the retained habitat from the contiguous natural habitat on the Remainder of Farm Paapekuilsfontein No. 281 (RE/281). The

	resulting high edge-to-area ratio would make the retained fynbos unlikely to remain functional in the long term.
Cumulative impact prior to mitigation:	High. The development would contribute to the progressive loss of Agulhas Limestone Fynbos at Struisbaai through the westward expansion of the town.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	→ A census of Mimetes saxatilis (and other proteoid SCC) on the development footprint and in Erf 80 must be undertaken in spring before the layout is finalised, and the boundary of Erf 80 and the adjacent erven should be adjusted to retain the densest stands where feasible. → Erf 80 must be zoned for nature conservation, fenced on its developed edge with fauna-permeable fencing, and protected by a title deed restriction or equivalent legal instrument. It should be incorporated into the management of the RE/281 conservation area. → The construction footprint must be demarcated before any clearing. No vehicles, stockpiles, spoil or construction camps may be placed in Erf 80. → A search and rescue of geophytes, succulents and other transplantable species must be undertaken by a suitably qualified person before clearing, with the plants used for landscaping or relocated to Erf 80 or RE/281. Seed of M. saxatilis and other Proteaceae should be collected for propagation by a specialist nursery. → Topsoil from the footprint should be stripped and re-used on road verges and private open space to retain the soil seed bank. → A vigorous alien invasive clearing programme must be implemented on the whole erf before construction and maintained in Erf 80 during the operational phase. Cut alien material must be removed from the site and not left in situ. → Landscaping of streets, private open space and gardens must use locally indigenous species. A list of prohibited invasive garden plants must be included in the home owners' constitution.

	→ A fire management plan must be prepared in consultation with the local fire protection association and CapeNature, with firebreaks placed on the developed edge rather than in Erf 80, so that ecological burning of Erf 80 together with the adjoining RE/281 remains possible. → Measures to limit the spread of the Argentine ant (inspection of imported soil, plants and building material) and controls on pets and access must be included in the operational EMPr.
Residual impacts:	High. On-site mitigation cannot compensate for the permanent loss of approximately 10.16 ha of Critically Endangered vegetation within CBA1, or for the fragmented configuration of the retained habitat.
Cumulative impact post mitigation:	High. The specialist indicates this may reduce to Medium only if the conservation areas proposed in the Struisbaai Conservation Master Plan (approximately 327 ha on RE/281) are formally secured and managed.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**2. ECOLOGICAL/ BOTANICAL** Loss of individuals and habitat of *Mimetes saxatilis* (EN), *Leucospermum patersonii* (VU) and other limestone endemics.
Nature of impact:	Negative
Extent and duration of impact:	Local; Permanent
Consequence of impact or risk:	Loss of a substantial part of the Erf 3495 subpopulation of *M. saxatilis*.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	High
Degree to which the impact can be reversed:	Irreversible, *M. saxatilis* cannot be transplanted.
Indirect impacts:	Reduced seed source for retained habitat.

Cumulative impact prior to mitigation:	Contributes to the decline of *M. saxatilis* at Struisbaai.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	→ A census of *Mimetes saxatilis* (and other proteoid SCC) on the development footprint and in Erf 80 must be undertaken in spring before the layout is finalised, and the boundary of Erf 80 and the adjacent erven should be adjusted to retain the densest stands where feasible. → Erf 80 must be zoned for nature conservation, fenced on its developed edge with fauna-permeable fencing, and protected by a title deed restriction or equivalent legal instrument. It should be incorporated into the management of the RE/281 conservation area. → The construction footprint must be demarcated before any clearing. No vehicles, stockpiles, spoil or construction camps may be placed in Erf 80. → A search and rescue of geophytes, succulents and other transplantable species must be undertaken by a suitably qualified person before clearing, with the plants used for landscaping or relocated to Erf 80 or RE/281. Seed of M. saxatilis and other Proteaceae should be collected for propagation by a specialist nursery. → Topsoil from the footprint should be stripped and re-used on road verges and private open space to retain the soil seed bank. → A vigorous alien invasive clearing programme must be implemented on the whole erf before construction and maintained in Erf 80 during the operational phase. Cut alien material must be removed from the site and not left in situ. → Landscaping of streets, private open space and gardens must use locally indigenous species. A list of prohibited invasive garden plants must be included in the home owners' constitution. → A fire management plan must be prepared in consultation with the local fire protection association and CapeNature, with firebreaks placed on the developed edge rather than in Erf 80, so that ecological burning of Erf 80 together with the adjoining RE/281 remains possible.

	→ Measures to limit the spread of the Argentine ant (inspection of imported soil, plants and building material) and controls on pets and access must be included in the operational EMPr.
Residual impacts:	High
Cumulative impact post mitigation:	High
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**3. HERITAGE IMPACT ASSESSMENT** Impacts on the natural landscape, including the loss of Agulhas Limestone Fynbos and CBA1, the visual character of the Agulhas cultural landscape, and palaeontological resources of the Waenhuiskrans Formation.
Nature of impact:	Negative
Extent and duration of impact:	Local; Permanent
Consequence of impact or risk:	Permanent loss of Critically Endangered habitat, CBA1 and plant Species of Conservation Concern; permanent transformation of the most visible part of the property; and permanent loss of palaeontological heritage should fossils be destroyed.
Probability of occurrence:	Definite for the loss of vegetation on the development footprint. Highly probable for construction-phase visual impacts. Possible for the loss of fossils.
Degree to which the impact may cause irreplaceable loss of resources:	High

Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	The Conservation Area would be a narrow band enclosed by erven, which is unlikely to remain functional and would be subject to edge effects, fire exclusion, trampling, dumping, pets and the spread of the Argentine ant. Loss of the natural outlook for adjoining residents. Impoverished landscape geohistory should fossils be lost.
Cumulative impact prior to mitigation:	High Negative
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
Degree to which the impact can be avoided:	Low. The loss of habitat and the development of the northern slope are inherent to the Alternative 1 layout, and the locations of fossils cannot be predicted.
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	***Visual Impact Assessment:*** → Alternative 1 is not supported by the visual specialist. ***Palaeontology:*** → The possible presence of fossils in the subsurface does not have an a priori influence on the decision to proceed with the proposed development. The potential impact has a moderate influence upon the proposed project, consisting of implemented mitigation measures recommended below, to be followed during the Construction Phases. → It is not feasible for a specialist monitor to be continuously present during the Construction Phases, when fossil bones may be unearthed at any time. The rescue of fossil bones during earth works critically depends on spotting this material as it is uncovered during digging. For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP) is included in the Environmental Management Plan (EMP) for the proposed development.

	→ The field supervisor/foreman and workers involved in excavations must be informed of the need to watch for fossil bones and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find. → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). → Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. → The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense. ***Additional mitigation measures from the HIA:*** → The Architectural Guidelines and Landscape Master Plan should be refined/finalised to ensure congruity and to incorporate the recommendations of this report, including the Mitigations, with particular attention to the double storey zones on the northern and southern edges, the plant palette and lighting. → The simulation of viewpoints 1 to 12 should be developed to enable assessment and testing of the proposed mitigation measures. → Once these visual simulations and a congruent, revised Landscape Master Plan and Architectural Guidelines are completed, they should be submitted to the Visual Impact Assessor for final visual impact assessment, to be submitted for ratification by HWC. → Final plans are generally in accordance with the layout and development guidelines for Erf 3495, Struisbaai, as shown on Alternative 2, as mitigated, refined and supported by HWC. → The mitigation measures listed in Section 15 of the Heritage Impact Assessment are included as conditions of the Environmental Authorisation and implemented.
Residual impacts:	High

Cumulative impact post mitigation:	Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**4. PERMANENT LOSS AND TRANSFORMATION OF FAUNAL HABITAT** A substantially larger development footprint results in extensive loss and transformation of natural habitat, with considerably less natural habitat retained.
Nature of impact:	Negative
Extent and duration of impact:	Local to landscape scale, because of the greater extent of habitat loss and reduced retained habitat. Permanent.
Consequence of impact or risk:	The same receptors are exposed to greater habitat loss and substantially reduced opportunities for persistence within the site. Magnitude is High: extensive habitat loss substantially reduces habitat availability and ecological function.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	High
Degree to which the impact can be reversed:	Very low. Extensive habitat transformation would be difficult to reverse.
Indirect impacts:	Substantially reduced capacity of the site to support faunal populations and ecological processes.
Cumulative impact prior to mitigation:	Makes a substantially larger contribution to cumulative habitat loss and fragmentation.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
Degree to which the impact can be avoided:	Low

Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	→ Protect and manage all remaining natural habitat; minimise unnecessary clearing; and retain the largest possible continuous natural areas. → The larger footprint substantially limits the effectiveness of mitigation.
Residual impacts:	Extensive habitat loss remains and the ecological function of the site is substantially reduced.
Cumulative impact post mitigation:	High
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**5. HABITAT FRAGMENTATION AND FAUNAL LANDSCAPE CONNECTIVITY** The larger development footprint causes substantially greater fragmentation, leaving limited and poorly configured habitat connections and isolated remnants.
Nature of impact:	Negative
Extent and duration of impact:	Local to landscape scale. Long-term to permanent.
Consequence of impact or risk:	The same ecological processes, with substantially greater loss of functional connectivity. Magnitude is High, because most functional connections across the site are substantially compromised.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	High

Degree to which the impact can be reversed:	Low. Extensive fragmentation would be difficult to reverse.
Indirect impacts:	As for Alternative 2, but across isolated remnants with substantially greater loss of connectivity.
Cumulative impact prior to mitigation:	Strong contribution to cumulative fragmentation within the broader landscape.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low. The configuration of the remaining habitat substantially limits mitigation effectiveness.
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	→ Protect and manage all remaining natural habitat and movement routes. Retain the widest available connections and minimise additional barriers. The configuration of the remaining habitat substantially limits mitigation effectiveness.
Residual impacts:	Substantial fragmentation and loss of functional connectivity remain.
Cumulative impact post mitigation:	High - Fencing is secondary to the larger fragmentation caused by the development footprint itself.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**6. CONSTRUCTION- RELATED DISTURBANCE, DISPLACEMENT AND DIRECT MORTALITY** The same impacts occur across a substantially larger development footprint and affect a greater area of natural habitat.

Nature of impact:	Negative
Extent and duration of impact:	Local, across a substantially larger area. Short- to medium-term disturbance, combined with greater permanent habitat effects.
Consequence of impact or risk:	The same receptors are affected over a greater area. Magnitude is High, because a substantially larger area is disturbed.
Probability of occurrence:	Probable – Definite
Degree to which the impact may cause irreplaceable loss of resources:	High – Direct Mortality and the destruction of microhabitats occur over a substantially larger area.
Degree to which the impact can be reversed:	Moderate for temporary disturbance; low for habitat and mortality impacts.
Indirect impacts:	Temporary barriers to fauna movement across a larger area, with less retained habitat available for displaced fauna.
Cumulative impact prior to mitigation:	Greater cumulative disturbance because of the larger footprint.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
Degree to which the impact can be avoided:	Low – The larger footprint leaves considerably less natural habitat outside the construction area.
Degree to which the impact can be managed:	Low – The substantially larger footprint limits the ability of construction controls to reduce the overall ecological impact.
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	→ Apply the same construction controls, although the substantially larger footprint limits their ability to reduce the overall ecological impact.

Residual impacts:	High – Significant disturbance and displacement remain because of the greater area affected.
Cumulative impact post mitigation:	High
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**7. PALAENTOLOGICAL IMPACTS** Loss of fossil bones and archaeological material from excavations in the upper Waenhuiskrans Formation.
Nature of impact:	Negative for the loss of fossil resources. Positive for fossil resources discovery
Extent and duration of impact:	Local; Permanent
Consequence of impact or risk:	Permanent loss of material palaeontological heritage.
Probability of occurrence:	Possible
Degree to which the impact may cause irreplaceable loss of resources:	Complete loss of fossil resources.
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	Impoverished landscape geohistory
Cumulative impact prior to mitigation:	Permanent loss of fossils and the associated scientific implications.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative
Degree to which the impact can be avoided:	Low. The locations of fossil bones in the aeolianites cannot be predicted.

Degree to which the impact can be managed:	Low. There is a high risk of valuable fossils being lost despite management actions to mitigate such loss.
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossils as excavations are being made. → It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the proposed development. → The Fossil Finds Procedure included as Appendix 2 provides guidelines to be followed in the event of fossil bone finds in the excavations. The works supervisor/foreman and workers involved in excavating the building foundations, infrastructure trenches and stormwater drainage must be informed of the need to watch for fossils and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find. → If a significant occurrence of fossil bones in a palaeontological context is discovered a professional palaeontologist must be appointed to collect them and to record their contexts. Said palaeontologist must also undertake the recording of the stratigraphic context and sedimentary geometry of the exposure, the sampling of ambient small fossil content and the compilation of the report for distribution to Heritage Western Cape, SAHRA, the approved curatorial institution and local heritage interest groups. → A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of

	discovered palaeontological remains by a contracted specialist shall be at the Developer's expense
Residual impacts:	Some fossils are rescued for posterity and available for scientific study. Significant loss may still occur.
Cumulative impact post mitigation:	Some fossils are rescued for posterity and available for scientific study.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium - High Positive
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**8. VISUAL IMPACT ASSESSMENT** Visual disturbance of the natural fynbos landscape and town edge from site clearance, earthworks and construction activity across the entire site, including the steep northern slope.
Nature of impact:	Negative
Extent and duration of impact:	Local; Short-Medium term
Consequence of impact or risk:	Visual disturbance of the status quo across the entire site, including scarring of the most visible slope, which cannot be screened.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium – High
Degree to which the impact can be reversed:	Low
Indirect impacts:	Increased construction-related activity, vehicles and dust on Adelle Street and the streets to the north, over a longer construction programme.
Cumulative impact prior to mitigation:	Medium – High

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	The VIA identifies no effective mitigation beyond general construction controls. Alternative 1 is not supported by the visual specialist.
Residual impacts:	Visible earthworks and retaining on the northern slope.
Cumulative impact post mitigation:	Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**9. TRAFFIC IMPACTS** Temporary increase in heavy vehicle and construction traffic on Adelle Street, Noreen Street and the local network, with associated nuisance and road-safety risk.
Nature of impact:	Negative
Extent and duration of impact:	Local; Short – Medium term
Consequence of impact or risk:	Nuisance (noise, dust, mud on roads), conflict between heavy vehicles and residents, pedestrians and cyclists on residential streets with no NMT facilities, and wear to municipal road surfaces.
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:	Short delays at the site access and the Main Road intersection during deliveries, particularly during holiday peaks.
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 - Medium Negative
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Restrict deliveries and heavy vehicle movements to normal working hours (07:00 to 17:00 on weekdays), and avoid school-run and peak holiday periods (Easter and December) where practicable. → Route heavy vehicles via Main Road (MR261) and Adelle Street, using the assessed site access about 90 m south of Lynn Street. → Provide flag personnel and temporary signage at the site access during deliveries. → Keep all construction vehicles, parking and material laydown within the site boundary, not on public roads. → Clean spilled material and mud from public roads daily. → Record the condition of Adelle Street before construction and repair any damage caused by construction vehicles. → Notify adjoining residents of the construction programme and abnormal deliveries.
Residual impacts:	Short-term, localised nuisance during civil works and house building.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	

Potential impact and risk:	**10. NOISE IMPACTS** Noise generated by construction vehicles, machinery, earthworks, excavation in calcrete and building activity across the entire site, including the steep northern slope.
Nature of impact:	Negative
Extent and duration of impact:	Local, extending to the adjoining residential properties on Noreen Street and Adelle Street and, owing to the development of the northern slope, to the residential areas around Karen Street and Santie Street. Short- to medium-term, over a longer construction programme than Alternative 2, as roads and services are constructed first and 84 houses are likely to be built intermittently over several years.
Consequence of impact or risk:	Disturbance and nuisance to a greater number of adjoining residents during working hours, and temporary disturbance of fauna in the smaller retained Nature Conservation Area and the adjoining RE/281.
Probability of occurrence:	Highly Probable
Degree to which the impact may cause irreplaceable loss of resources:	None
Degree to which the impact can be reversed:	Fully reversible. Noise ceases on completion of construction.
Indirect impacts:	Temporary displacement of noise-sensitive fauna from the limited habitat retained adjacent to the construction footprint.
Cumulative impact prior to mitigation:	Minor contribution to ambient noise at the existing urban edge of Struisbaai.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low – Medium Negative**
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High

Proposed mitigation:	→ Construction activities must be restricted to normal working hours as specified in the EMPr, with no construction on Sundays or public holidays unless otherwise approved. → Construction must comply with the Western Cape Noise Control Regulations (PN 200 of 2013) and the applicable municipal by-laws. → Machinery and vehicles must be properly maintained and fitted with effective silencers, and idling must be minimised. → Noisy activities must be scheduled to limit disturbance to adjoining residents, and night-time construction must be avoided. Adjoining residents must be notified in advance of particularly noisy activities, and a complaints register must be maintained by the Contractor and reviewed by the ECO.
Residual impacts:	Low. Short-term nuisance during working hours, affecting a larger number of receptors than Alternative 2.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**11. DUST IMPACTS** Generation of dust from vegetation clearance, earthworks, stockpiles and vehicle movement on unsurfaced areas, exposing the sandy soils of approximately 10.16 ha of the site, including the steep northern slope, to wind.
Nature of impact:	Negative
Extent and duration of impact:	Local, extending to the adjoining residential properties downwind of the site, including those to the north of the site, and to the retained vegetation in the Nature Conservation Area. Short- to medium-term, for the duration of construction.
Consequence of impact or risk:	Nuisance to adjoining residents; dust deposition on the narrow retained Nature Conservation Area, which is enclosed by erven on both sides; and loss of topsoil through wind erosion of cleared areas, particularly on the exposed northern slope.

Probability of occurrence:	Highly probable, given the exposed coastal location, the sandy soils and the larger cleared area.
Degree to which the impact may cause irreplaceable loss of resources:	Low – Medium. Loss of topsoil and its seed bank through wind erosion, particularly on the steeper slopes where earthworks and retaining are required.
Degree to which the impact can be reversed:	Reversible. Dust generation ceases once surfaces are stabilised and rehabilitated.
Indirect impacts:	Reduced effectiveness of rehabilitation where topsoil is lost; dust deposition on fynbos within and adjoining the retained habitat.
Cumulative impact prior to mitigation:	Minor contribution to dust in the surrounding residential area.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Medium Negative**
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium – High
Degree to which the impact can be mitigated:	Medium – High
Proposed mitigation:	→ Clearing must be undertaken progressively and limited to the areas required for immediate construction, so that large areas are not left exposed. → Exposed areas, haul roads and stockpiles must be dampened as necessary, using non-potable water where available. → Stockpiles must be located away from the Nature Conservation Area and adjoining residential boundaries, kept at a low height, and covered or stabilised where they remain for extended periods. → Vehicle speeds on site must be limited, and loads of loose material must be covered during transport. Dust-generating activities must be suspended during strong winds. → Topsoil must be stripped and stored for re-use, and disturbed areas, including cut and fill slopes on the northern slope, must be stabilised and rehabilitated progressively.

	→ A complaints register must be maintained and reviewed by the ECO.
Residual impacts:	Low – Medium. Occasional dust nuisance during windy conditions, with a higher risk on the exposed northern slope.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – Medium Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**12. SOCIOECONOMIC** Creation of temporary employment and business opportunities during the construction of services infrastructure and 84 houses.
Nature of impact:	Positive. Direct and indirect economic benefits to the local economy.
Extent and duration of impact:	Local to regional (Cape Agulhas Municipality). Short- to medium-term, as houses are likely to be built over several years.
Consequence of impact or risk:	Temporary employment for construction workers and contractors, and increased demand for local building materials, suppliers and services, marginally greater than for Alternative 2 owing to the additional 13 erven.
Probability of occurrence:	Probable
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:	Increased demand for local building materials, suppliers and services.
Cumulative impact prior to mitigation:	Contributes positively to construction-sector activity in Struisbaai.

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:	High
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Preference must be given to the employment of local labour, contractors and suppliers from the Cape Agulhas area, where feasible. → Skills transfer and training should be provided to local workers where possible. → Construction workers must not be accommodated on site, the site must be fenced and access controlled, and a code of conduct must be implemented to address the security concerns of adjoining residents.
Residual impacts:	Positive. Temporary employment and economic benefit to the local economy.
Cumulative impact post mitigation:	Medium – High
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High Positive
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**13. ECOLOGICAL/BOTANICAL** Fragmentation, edge effects and disruption of fire, pollination and ant-mediated seed dispersal.
Nature of impact:	Negative
Extent and duration of impact:	Local; Permanent
Consequence of impact or risk:	Retained habitat unlikely to persist in a functional state; fire exclusion inevitable.
Probability of occurrence:	Highly Probable

Degree to which the impact may cause irreplaceable loss of resources:	Medium
Degree to which the impact can be reversed:	Partly reversed
Indirect impacts:	→ Invasion by the alien Argentine ant (*Linepithema humile*), which displaces indigenous seed-dispersing ants and does not disperse fynbos seed, including that of *Mimetes saxatilis* and Rutaceae. → Trampling, informal paths and dumping resulting from increased human access.
Cumulative impact prior to mitigation:	Contributes to fragmentation of the urban edge of the CBA1
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	→ Erf 80 must be zoned for nature conservation, fenced on its developed edge with fauna-permeable fencing, and protected by a title deed restriction or equivalent legal instrument. It should be incorporated into the management of the RE/281 conservation area. → A vigorous alien invasive clearing programme must be implemented on the whole erf before construction and maintained in Erf 80 during the operational phase. Cut alien material must be removed from the site and not left in situ. → Landscaping of streets, private open space and gardens must use locally indigenous species. A list of prohibited invasive garden plants must be included in the home owners' constitution. → A fire management plan must be prepared in consultation with the local fire protection association and CapeNature, with firebreaks placed on the developed edge rather than in Erf 80, so that ecological burning of Erf 80 together with the adjoining RE/281 remains possible. → Measures to limit the spread of the Argentine ant (inspection of imported soil, plants and building material)

	and controls on pets and access must be included in the operational EMPr.
Residual impacts:	Medium
Cumulative impact post mitigation:	Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**14. ECOLOGICAL/ BOTANICAL** Spread of alien invasive plants and garden escapes.
Nature of impact:	Negative
Extent and duration of impact:	Local; Permanent
Consequence of impact or risk:	Degradation of retained habitat
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Medium
Degree to which the impact can be reversed:	Reversible with clearing.
Indirect impacts:	Increased fuel load
Cumulative impact prior to mitigation:	Contributes to alien
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High

Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Erf 80 must be zoned for nature conservation, fenced on its developed edge with fauna-permeable fencing, and protected by a title deed restriction or equivalent legal instrument. It should be incorporated into the management of the RE/281 conservation area. → A vigorous alien invasive clearing programme must be implemented on the whole erf before construction and maintained in Erf 80 during the operational phase. Cut alien material must be removed from the site and not left in situ. → Landscaping of streets, private open space and gardens must use locally indigenous species. A list of prohibited invasive garden plants must be included in the home owners' constitution. → A fire management plan must be prepared in consultation with the local fire protection association and CapeNature, with firebreaks placed on the developed edge rather than in Erf 80, so that ecological burning of Erf 80 together with the adjoining RE/281 remains possible. → Measures to limit the spread of the Argentine ant (inspection of imported soil, plants and building material) and controls on pets and access must be included in the operational 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 Negative
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**15. HABITAT FRAGMENTATION AND FAUNAL LANDSCAPE CONNECTIVITY** Ongoing operational pressures on the small remaining open space area contributing to greater fragmentation, leaving limited and poorly configured habitat connections and isolated remnants.
Nature of impact:	Negative

Extent and duration of impact:	Local to landscape scale. Long-term to permanent.
Consequence of impact or risk:	The same ecological processes, with substantially greater loss of functional connectivity. Magnitude is High, because most functional connections across the site are substantially compromised.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	High. The Site Ecological Importance of faunal landscape connectivity is High, and most functional connections are lost.
Degree to which the impact can be reversed:	Low. Extensive fragmentation would be difficult to reverse.
Indirect impacts:	Reduced dispersal and recolonisation potential for small, ground-restricted endemics such as Fynbos Buttonquail, Southern Adder and Scarce Mountain Copper, which are less resilient to fragmentation. This reduced dispersal will be across isolated remnants with substantially greater loss of connectivity compared to Alternative 2 (preferred).
Cumulative impact prior to mitigation:	Strong contribution to cumulative fragmentation within the broader landscape.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
Degree to which the impact can be avoided:	Low.
Degree to which the impact can be managed:	Low. The configuration of the remaining habitat substantially limits mitigation effectiveness.
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	→ Protect and manage all remaining natural habitat and movement routes. Retain the widest available connections and minimise additional barriers. The configuration of the remaining habitat substantially limits mitigation effectiveness.

Residual impacts:	Substantial fragmentation and loss of functional connectivity remain.
Cumulative impact post mitigation:	High - Fencing is secondary to the larger fragmentation caused by the development footprint itself.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**16. OPERATIONAL DISTURBANCE AND DEGRADATION OF RETAINED FAUNA** Residential occupation introduces artificial lighting, noise, traffic, human activity, domestic animals, alien plant spread and other edge effects that may affect substantially smaller and and more isolated remnants, increasing their vulnerability to degradation and reducing their ecological function.
Nature of impact:	Negative
Extent and duration of impact:	Local, with proportionally greater effects because less natural habitat remains. Long-term to permanent.
Consequence of impact or risk:	The same receptors within smaller and less functional habitat remnants. Magnitude is High, because operational pressures act on limited and fragmented remnants.
Probability of occurrence:	Highly probable
Degree to which the impact may cause irreplaceable loss of resources:	High. Small and isolated remnants are less resilient to chronic disturbance.
Degree to which the impact can be reversed:	Low to moderate, because small, isolated remnants are less resilient.
Indirect impacts:	Predation of reptiles, small mammals and ground-dwelling birds by domestic animals; road mortality on internal roads; light spill into natural habitat; encroachment of invasive garden plants; and secondary poisoning of raptors and other predators from rodenticides.

Cumulative impact prior to mitigation:	Greater cumulative effect, because remaining habitat is limited and more isolated.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low. The limited extent and isolation of remnants substantially reduce the effectiveness of mitigation.
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	→ Manage all retained habitat specifically for conservation; control invasive alien vegetation; use locally indigenous vegetation in rehabilitation and landscaping adjacent to natural habitat; minimise unnecessary lighting and use appropriately directed, low-spill lighting; control noise and unnecessary access to conservation areas; implement appropriate controls on domestic animals; enforce low vehicle speeds (maximum 30 km/h adjoining natural habitat); manage ecologically appropriate fire regimes where feasible; avoid broad-spectrum pesticides and second-generation anticoagulant rodenticides; and monitor habitat condition and faunal responses, applying adaptive management.
Residual impacts:	Small and isolated remnants remain exposed to chronic disturbance and retain substantially reduced ecological function.
Cumulative impact post mitigation:	High
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**17. VISUAL IMPACTS** A permanent residential layer added to the coastal cultural landscape, with houses stepping down the most visible slope of the site and the town extended towards Santie Street.

Nature of impact:	Negative
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	Houses, streets, walls and gardens inserted across the slope, which cannot be screened, including in the foreground of Viewpoint 7 (Santie Street), where the VIA rates the visual intrusion as High.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	High
Degree to which the impact can be reversed:	Low
Indirect impacts:	Domestic and street lighting on the slope. Induced traffic on Adelle Street and Noreen Street.
Cumulative impact prior to mitigation:	High
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	Alternative 1 is not supported by the visual specialist.
Residual impacts:	Houses on the most visible slope, seen from the north and north-east, and a fragmented conservation area.
Cumulative impact post mitigation:	Medium – High
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High Negative

POST-CONSTRUCTION PHASE	
Potential impact and risk:	**18. TRAFFIC IMPACTS** Additional residential traffic on Adelle Street and the Main Road (MR261); Industria Road; Argonauta Avenue intersection, with a risk of congestion and road-safety conflict at the site access.
Nature of impact:	Negative
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	Slightly higher delays than Alternative 2 at the Main Road intersection and the site access. Not quantified.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Low
Indirect impacts:	Increased pedestrian and cyclist use of Adelle Street, which has no NMT facilities. Additional demand on public transport along Main Road.
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 Negative
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Restrict deliveries and heavy vehicle movements to normal working hours (07:00 to 17:00 on weekdays), and avoid school-run and peak holiday periods (Easter and December) where practicable.

	→ Route heavy vehicles via Main Road (MR261) and Adelle Street, using the assessed site access about 90 m south of Lynn Street. → Provide flag personnel and temporary signage at the site access during deliveries. → Keep all construction vehicles, parking and material laydown within the site boundary, not on public roads. → Clean spilled material and mud from public roads daily. → Record the condition of Adelle Street before construction and repair any damage caused by construction vehicles. → Notify adjoining residents of the construction programme and abnormal deliveries.
Residual impacts:	A marginal increase in peak-hour delay at the Main Road intersection compared with Alternative 2.
Cumulative impact post mitigation:	Low to Medium. Seasonal congestion at the Main Road intersection.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative
DECOMMISSIONING AND CLOSURE 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

ALTERNATIVE 2 – PREFERRED

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**1. ECOLOGICAL/BOTANICAL** Loss of Agulhas Limestone Fynbos and Critical Biodiversity Area 1 habitat within the development footprint.
Nature of impact:	Negative
Extent and duration of impact:	Local, with regional significance owing to CR status; permanent.
Consequence of impact or risk:	Loss of CR vegetation in CBA1. The retained 3.96 ha is a single block contiguous with RE/281
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	High
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	Edge effects on the Nature Conservation Area (less than for Alternative 1).
Cumulative impact prior to mitigation:	Contributes to the loss of Agulhas Limestone Fynbos at Struisbaai.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
Degree to which the impact can be avoided:	Low – Medium

Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Retention and formal protection of Erf 80: Erf 80 must be zoned for nature conservation, fenced on its developed edge with fauna-permeable fencing, protected by a title deed restriction or equivalent legal instrument, and incorporated into the management of the RE/281 conservation area. → The construction footprint must be demarcated before any clearing, and no vehicles, stockpiles, spoil or construction camps may be placed in Erf 80. → A search and rescue of geophytes, succulents and other transplantable species must be undertaken by a suitably qualified person before clearing, and seed of *M. saxatilis* and other Proteaceae collected for propagation. → Topsoil must be stripped and re-used on road verges and private open space. Landscaping must use locally indigenous species.
Residual impacts:	Medium
Cumulative impact post mitigation:	Medium; Low if the Conservation Master Plan areas are secured.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**2. ECOLOGICAL/BOTANICAL** Loss of individuals and habitat of *Mimetes saxatilis* (EN), *Leucospermum patersonii* (VU) and other limestone endemics.
Nature of impact:	Negative
Extent and duration of impact:	Local population near the species' distribution limit; permanent.

Consequence of impact or risk:	Loss of part of the Erf 3495 subpopulation of *M. saxatilis*; part retained in Erf 80.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	High
Degree to which the impact can be reversed:	Irreversible; *M. saxatilis* cannot be transplanted.
Indirect impacts:	Reduced seed source for retained habitat.
Cumulative impact prior to mitigation:	Contributes to the decline of *M. saxatilis* at Struisbaai.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
Degree to which the impact can be avoided:	Medium (by refining the layout around the densest stands.)
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ A census of *Mimetes saxatilis* (and other proteoid SCC) on the development footprint and in Erf 80 must be undertaken in spring before the layout is finalised, and the boundary of Erf 80 and the adjacent erven adjusted to retain the densest stands where feasible. → Seed of *M. saxatilis* and other Proteaceae must be collected for propagation by a specialist nursery. → A search and rescue of geophytes, succulents and other transplantable species must be undertaken before clearing, with plants used for landscaping or relocated to Erf 80 or RE/281.
Residual impacts:	Medium
Cumulative impact post mitigation:	Medium; Low if the conservation Master Plan are secured,
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**3. Heritage Impact Assessment** Impacts on the natural landscape (Agulhas Limestone Fynbos and CBA1), the visual character of the Agulhas cultural landscape, and palaeontological resources of the Waenhuiskrans Formation.
Nature of impact:	Negative
Extent and duration of impact:	Local; permanent for the loss of vegetation and of any fossils destroyed. Construction visual impacts are short- to medium-term.
Consequence of impact or risk:	Permanent loss of 8.15 ha of Critically Endangered habitat and part of the *M. saxatilis* subpopulation; extension of the town onto the crest of the rise; and permanent loss of palaeontological heritage should fossils be destroyed. The most visible northern slope is retained as Erf 80.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	High
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	Edge effects on the Nature Conservation Area (less than for Alternative 1). Loss of the natural outlook for adjoining residents on Noreen Street and Adelle Street. Impoverished landscape geohistory should fossils be lost.
Cumulative impact prior to mitigation:	Contributes to the loss of Agulhas Limestone Fynbos at Struisbaai.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High Negative
Degree to which the impact can be avoided:	Low to Medium. Avoidance has already been applied in the layout through the retention of the northern slope as Erf 80; the locations of fossils cannot be predicted.

Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ The Architectural Guidelines and Landscape Master Plan must be refined and finalised to ensure congruity and to incorporate the recommendations of the HIA, with particular attention to the double storey zones on the northern and southern edges, the plant palette and lighting. → Visual simulations from the identified viewpoints must be developed to assess and test the proposed mitigation measures, and submitted with the revised Landscape Master Plan and Architectural Guidelines to the Visual Impact Assessor for final visual impact assessment and ratification by HWC. → Final plans must be generally in accordance with the amended Alternative 2 layout and development guidelines (Appendix B2), as mitigated, refined and supported by HWC. → The Fossil Finds Procedure must be included in the EMPr (see Impact 7 above). → The mitigation measures listed in Section 15 of the HIA must be included as conditions of the Environmental Authorisation and implemented.
Residual impacts:	Medium
Cumulative impact post mitigation:	Medium; Low if the Conservation Master Plan areas as secured.
Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	Medium Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**4. PERMANENT LOSS AND TRANSFORMATION OF FAUNAL HABITAT** Permanent clearing and transformation of Agulhas Limestone Fynbos within the approved development footprint, reducing habitat available to SCC and other fauna. The 3.96 ha Erf 80 Nature Conservation Area is retained.

Nature of impact:	Negative
Extent and duration of impact:	Primarily local, with wider ecological relevance because the development occurs within Critically Endangered Agulhas Limestone Fynbos and a CBA1 landscape. Long-term to permanent.
Consequence of impact or risk:	Reduced habitat for Black Harrier, Denham's Bustard, Southern Black Korhaan, Fynbos Buttonquail, Southern Adder, Scarce Mountain Copper and other fauna associated with Agulhas Limestone Fynbos. Magnitude is Medium–High: substantial habitat loss occurs, although Erf 80 and other retained habitat remain.
Probability of occurrence:	Definite where clearing occurs.
Degree to which the impact may cause irreplaceable loss of resources:	High. Permanent loss of Critically Endangered habitat of High Site Ecological Importance.
Degree to which the impact can be reversed:	Low. Cleared habitat cannot readily be restored to its original ecological condition.
Indirect impacts:	Reduced capacity of the site to support faunal populations and ecological processes.
Cumulative impact prior to mitigation:	Adds to existing loss and fragmentation of Critically Endangered lowland fynbos within the broader Struisbaai landscape. The broader Paapekuilsfontein conservation framework provides landscape-scale mitigation.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High
Degree to which the impact can be avoided:	Moderate. Retention of the northern 3.96 ha as Erf 80 is an important avoidance measure; loss within the development footprint cannot be avoided.
Degree to which the impact can be managed:	Moderate
Degree to which the impact can be mitigated:	Moderate

Proposed mitigation:	→ Restrict clearing to the approved Alternative 2 footprint; secure and manage Erf 80; → Prevent unnecessary disturbance to retained habitat; protect important refugia and microhabitats; → Control invasive alien vegetation; → Maintain ecologically appropriate fire regimes; rehabilitate temporarily disturbed areas; and → Implement the broader Paapekuilsfontein conservation framework.
Residual impacts:	Habitat extent remains reduced and local faunal populations or habitat use may decline. Erf 80 and the broader conservation framework retain meaningful habitat and ecological function.
Cumulative impact post mitigation:	Medium. Permanent habitat loss within the development footprint remains, although the broader conservation framework addresses cumulative loss at the landscape scale.
Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	Medium Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**5. HABITAT FRAGMENTATION AND FAUNAL LANDSCAPE CONNECTIVITY** Development divides existing natural habitat and reduces terrestrial movement opportunities. Erf 80 retains an important potential connection to the broader Paapekuilsfontein conservation landscape. Perimeter security fencing creates an additional localised constraint on terrestrial movement.
Nature of impact:	Negative
Extent and duration of impact:	Local to landscape scale; Long-term
Consequence of impact or risk:	Reduced terrestrial faunal movement, dispersal, recolonisation and access to resources, particularly for small mammals, reptiles, tortoises and other ground-dwelling fauna. Magnitude is Medium–High, because development reduces habitat continuity within an ecologically important landscape.

Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Moderate. The Site Ecological Importance of faunal landscape connectivity is High, but Erf 80 retains a connection to adjoining natural habitat.
Degree to which the impact can be reversed:	Low to moderate. Some movement function can be retained through layout and management, but the development footprint remains.
Indirect impacts:	Reduced dispersal and recolonisation potential for small, ground-restricted endemics such as Fynbos Buttonquail, Southern Adder and Scarce Mountain Copper, which are less resilient to fragmentation.
Cumulative impact prior to mitigation:	Relevant to the wider conservation network, because Erf 3495 occurs within a CBA1 landscape and contributes to connectivity across Paapekuilsfontein.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High Negative
Degree to which the impact can be avoided:	Moderate. Erf 80 retains a connection to the wider conservation landscape.
Degree to which the impact can be managed:	Moderate
Degree to which the impact can be mitigated:	Moderate
Proposed mitigation:	→ Maintain Erf 80 as part of the wider connected conservation landscape; retain the widest possible natural-habitat connections; implement the broader Conservation Master Plan; and manage alien vegetation and disturbance along movement interfaces. → The estate security perimeter should enclose the residential development while leaving Erf 80 connected to adjoining natural habitat. → Where fencing must cross a movement interface, fauna passages must be incorporated and maintained, electrified strands must not create a mortality risk, and solid walls must not be used along conservation edges.
Residual impacts:	Habitat remains fragmented and movement opportunities are reduced. Erf 80 can retain an important connectivity function

	if it remains physically connected to adjoining natural habitat and is actively managed. With Erf 80 outside the security perimeter, the residual fencing-related impact is Low Negative; if the perimeter encloses Erf 80, it is Medium Negative.
Cumulative impact post mitigation:	Medium, reduced at the landscape scale if the broader Conservation Master Plan is implemented
Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	Medium Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**6. CONSTRUCTION-RELATED DISTURBANCE, DISPLACEMENT AND DIRECT MORTALITY** Vegetation clearing, earthworks, machinery, vehicles, trenches and construction activity may cause direct mortality, displacement, destruction of refugia and temporary barriers to fauna movement.
Nature of impact:	Negative
Extent and duration of impact:	Primarily local and concentrated within the construction footprint. Mainly short- to medium-term during construction, although mortality and the destruction of some microhabitats are permanent.
Consequence of impact or risk:	Mortality and displacement of reptiles, tortoises, small mammals, invertebrates and ground-nesting or ground-foraging birds. Cryptic and slow-moving fauna, including the Southern Adder (VU) and Angulate Tortoise, are particularly vulnerable during clearing. Magnitude is Medium–High, because clearing affects natural habitat and cryptic fauna may be difficult to detect.
Probability of occurrence:	Probable to definite without mitigation.
Degree to which the impact may cause irreplaceable loss of resources:	Moderate. Displacement is largely temporary, but direct mortality and the destruction of some microhabitats are permanent.

Degree to which the impact can be reversed:	Moderate for disturbance and displacement; low for direct mortality and the destruction of some microhabitats.
Indirect impacts:	Temporary barriers to fauna movement during construction, and the displacement of fauna into retained habitat, including Erf 80.
Cumulative impact prior to mitigation:	Construction adds short-term disturbance to a landscape already affected by urban development, roads and habitat transformation.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium–High Negative
Degree to which the impact can be avoided:	Moderate. The retention of Erf 80 as a construction no-go area avoids construction impacts on the northern 3.96 ha; impacts within the development footprint cannot be avoided.
Degree to which the impact can be managed:	High. Direct mortality and displacement risks are substantially reduced by good construction management.
Degree to which the impact can be mitigated:	Moderate
Proposed mitigation:	→ Demarcate the approved construction footprint and the boundary of Erf 80 before site establishment and prohibit clearing outside the footprint. → Treat Erf 80 as a construction no-go area. Undertake a pre-construction faunal inspection of refugia immediately before clearing; clear progressively and in a direction that allows fauna to move towards retained habitat; and relocate slow-moving animals a short distance into suitable adjoining habitat where legally permissible. → Stop work if a Southern Adder or other reptile is encountered until it has moved or been removed by a competent person; snakes may not be killed, and the EMPr must include a snake-removal procedure. → Check vegetation for active bird nests before clearing. Enforce low vehicle speeds. → Close or backfill excavations promptly, provide escape ramps in excavations left open overnight, and inspect them each morning and before backfilling. → Minimise night-time construction, provide environmental induction for all personnel, and require the ECO to record fauna encountered, rescues, relocations and mortalities.

Residual impacts:	Direct mortality and displacement risks are substantially reduced by good construction management, although some fauna will still be displaced through permanent habitat loss.
Cumulative impact post mitigation:	Low to Medium. Construction disturbance is short- to medium-term, but displacement through permanent habitat loss adds to cumulative pressure in the Struisbaai landscape.
Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	Medium Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**7. PALAEONTOLOGICAL IMPACTS** Loss of fossil bones and archaeological material from excavations in the upper Waenhuiskrans Formation.
Nature of impact:	Negative
Extent and duration of impact:	Site: Permanent
Consequence of impact or risk:	Permanent loss of material palaeontological heritage
Probability of occurrence:	Possible
Degree to which the impact may cause irreplaceable loss of resources:	Complete loss of fossil resources
Degree to which the impact can be reversed:	Irreversible
Indirect impacts:	Impoverished landscape geohistory
Cumulative impact prior to mitigation:	Permanent loss of fossils and the associated scientific implications
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative
Degree to which the impact can be avoided:	Low. The locations of fossil bones in the aeolianites cannot be predicted.

Degree to which the impact can be managed:	Low. There is a high risk of valuable fossils being lost despite management actions to mitigate such loss.
Degree to which the impact can be mitigated:	Moderate
Proposed mitigation:	→ Earthworks personnel must be involved in mitigation by watching for fossils as excavations are made. → The Fossil Finds Procedure (FFP) in Appendix 2 of the PIA must be included in the EMPr. → The works supervisor/foreman and workers excavating building foundations, infrastructure trenches and stormwater drainage must be informed of the need to watch for fossils and archaeological material. Workers seeing potential objects must cease work at that spot and report to the works supervisor, who must report to the ECO and/or the Developer. → The ECO/Developer must liaise with HWC and the standby palaeontologist on the nature of the find and suitable consequent actions. If a significant occurrence of fossil bones is discovered, a professional palaeontologist must be appointed to collect them, record their context and report to HWC, SAHRA, the approved curatorial institution and local heritage interest groups. → A permit from HWC is required to excavate fossil finds, and the fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.
Residual impacts:	Some fossils are rescued for posterity and available for scientific study. Significant loss may still occur.
Cumulative impact post mitigation:	Some fossils are rescued for posterity and available for scientific study.
Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	**Medium – High Positive**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**8. NOISE IMPACTS** Noise generated by construction vehicles, machinery, earthworks, excavation in calcrete and building activity.

Nature of impact:	Negative
Extent and duration of impact:	Local, limited to the site and the adjoining residential properties on Noreen Street and Adelle Street. Short- to medium-term, as roads and services are constructed first and individual houses are likely to be built intermittently over several years.
Consequence of impact or risk:	Disturbance and nuisance to adjoining residents during working hours, and temporary disturbance of fauna in Erf 80 and the adjoining RE/281.
Probability of occurrence:	Highly Probable
Degree to which the impact may cause irreplaceable loss of resources:	None
Degree to which the impact can be reversed:	Fully reversible. Noise ceases on completion of construction.
Indirect impacts:	Temporary displacement of noise-sensitive fauna from habitat adjoining the construction footprint.
Cumulative impact prior to mitigation:	Minor contribution to ambient noise at the existing urban edge of Struisbaai.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Construction activities must be restricted to normal working hours as specified in the EMPr, with no construction on Sundays or public holidays unless otherwise approved. Construction must comply with the Western Cape Noise Control Regulations (PN 200 of 2013) and the applicable municipal by-laws. Machinery and vehicles must be properly maintained and fitted with effective silencers, and idling must be minimised. Noisy activities must be scheduled to limit disturbance to

	adjoining residents, and night-time construction must be avoided. Adjoining residents must be notified in advance of particularly noisy activities, and a complaints register must be maintained by the Contractor and reviewed by the ECO.
Residual impacts:	Low. Short-term nuisance during working hours.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	Low Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**9. DUST IMPACTS** Generation of dust from vegetation clearance, earthworks, stockpiles and vehicle movement on unsurfaced areas, exposing the sandy soils of the site to wind.
Nature of impact:	Negative
Extent and duration of impact:	Local, extending to the adjoining residential properties downwind of the site and to the retained vegetation in Erf 80. Short- to medium-term, for the duration of construction.
Consequence of impact or risk:	Nuisance to adjoining residents; dust deposition on retained vegetation in Erf 80; and loss of topsoil through wind erosion of cleared areas.
Probability of occurrence:	Highly probable, given the exposed coastal location and sandy soils.
Degree to which the impact may cause irreplaceable loss of resources:	Low. Loss of topsoil and its seed bank through wind erosion if exposed areas are not managed.
Degree to which the impact can be reversed:	Reversible. Dust generation ceases once surfaces are stabilised and rehabilitated.
Indirect impacts:	Reduced effectiveness of rehabilitation where topsoil is lost; dust deposition on fynbos adjoining the construction footprint.

Cumulative impact prior to mitigation:	Minor contribution to dust in the surrounding residential area.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Clearing must be undertaken progressively and limited to the areas required for immediate construction, so that large areas are not left exposed. → Exposed areas, haul roads and stockpiles must be dampened as necessary, using non-potable water where available. → Stockpiles must be located away from Erf 80 and adjoining residential boundaries, kept at a low height, and covered or stabilised where they remain for extended periods. → Vehicle speeds on site must be limited, and loads of loose material must be covered during transport. → Dust-generating activities must be suspended during strong winds. → Topsoil must be stripped and stored for re-use, and disturbed areas must be rehabilitated progressively. → A complaints register must be maintained and reviewed by the ECO.
Residual impacts:	Low. Occasional dust nuisance during windy conditions.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	Low Negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**10. SOCIOECONOMIC**

	Creation of temporary employment and business opportunities during the construction of services infrastructure and houses.
Nature of impact:	Positive. Direct and indirect economic benefits to the local economy.
Extent and duration of impact:	Local to regional (Cape Agulhas Municipality). Short- to medium-term, as houses are likely to be built over several years.
Consequence of impact or risk:	Temporary employment for construction workers and contractors, and increased demand for local building materials, suppliers and services.
Probability of occurrence:	Probable
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:	
Cumulative impact prior to mitigation:	Contributes positively to construction-sector activity in Struisbaai.
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:	High
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Preference must be given to the employment of local labour, contractors and suppliers from the Cape Agulhas area, where feasible. → Skills transfer and training should be provided to local workers where possible. → Construction workers must not be accommodated on site, the site must be fenced and access controlled, and

	a code of conduct must be implemented to address the security concerns of adjoining residents.
Residual impacts:	Positive. Temporary employment and economic benefit to the local economy.
Cumulative impact post mitigation:	Medium – High
Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	Medium - High Positive
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**11. Visual Impact** Visual disturbance of the natural fynbos landscape and town edge from site clearance, earthworks and construction activity on the crest and southern part of the site.
Nature of impact:	Negative
Extent and duration of impact:	Local; short-term to medium-term
Consequence of impact or risk:	Visual disturbance of the status quo, with foreground construction activity for adjoining residents.
Probability of occurrence:	Highly probable
Degree to which the impact may cause irreplaceable loss of resources:	Medium. Fynbos on the development footprint is lost, but the visually sensitive northern slope (Erf 80) is retained.
Degree to which the impact can be reversed:	Low to Medium
Indirect impacts:	Increased construction-related activity, vehicles and dust on Adelle Street.
Cumulative impact prior to mitigation:	Medium. Adds to development activity on adjacent properties at the existing south-western edge of the town.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium negative

Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Medium – High
Degree to which the impact can be mitigated:	Medium – High
Proposed mitigation:	→ Limit clearance to roads, services and the construction zone of each erf. → Fence off Erf 80 and the private open space during construction, with no stockpiling, access or dumping. → Manage dust and hoarding. → Rescue plants and stockpile topsoil for reuse. → Rehabilitate progressively with locally indigenous species. → Retain Erf 80 as a Nature Conservation Area.
Residual impacts:	Controlled adverse visual impacts for a limited duration.
Cumulative impact post mitigation:	Neutral
Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	Medium negative
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**12. TRAFFIC IMPACT** Temporary increase in heavy vehicle and construction traffic on Adelle Street and the local network, with associated nuisance and road-safety risk.
Nature of impact:	Negative
Extent and duration of impact:	Local; Short to medium-term
Consequence of impact or risk:	Nuisance (noise, dust, mud on roads), conflict between heavy vehicles and residents, pedestrians and cyclists on residential streets with no NMT facilities, and wear to municipal road surfaces.
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:	Short delays at the site access and the Main Road intersection during deliveries, particularly during holiday peaks.
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 – Medium
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ Restrict deliveries and heavy vehicle movements to normal working hours (07:00 to 17:00 on weekdays), weekends (08:00 – 13:00) and avoid school-run and peak holiday periods (Easter and December) where practicable. → Route heavy vehicles via Main Road (MR261) and Adelle Street, using the assessed site access about 90 m south of Lynn Street. → Provide flag personnel and temporary signage at the site access during deliveries. → Keep all construction vehicles, parking and material laydown within the site boundary, not on public roads. → Clean spilled material and mud from public roads daily. → Record the condition of Adelle Street before construction and repair any damage caused by construction vehicles. → Notify adjoining residents of the construction programme and abnormal deliveries.
Residual impacts:	Short-term, localised nuisance during civil works and house building.
Cumulative impact post mitigation:	Low

Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	Low Negative
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**13. VISUAL IMPACT** A contemporary residential layer added to the coastal cultural landscape, with the town extended onto the crest of the rise and a new built skyline at the brow of Erf 80.
Nature of impact:	Negative
Extent and duration of impact:	Local; Long-term to Permanent
Consequence of impact or risk:	Houses, streets, gardens and lighting inserted on the crest. The impact is highly visible from the adjoining streets (Viewpoints 1 to 5). From the north (Viewpoints 6 and 7) the slope remains natural, but the northern row forms a new skyline. From the middle and long distance (Viewpoints 8 to 11), the development reads as part of the town, provided roofs are dark and walls are a muted off-white; this is to be confirmed by simulation.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Medium
Degree to which the impact can be reversed:	Low
Indirect impacts:	Domestic and street lighting on the crest. Induced traffic on Adelle Street.
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:	Medium
Degree to which the impact can be managed:	Medium – High

Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Adopt the Architectural Guidelines as a condition of approval, enforced through the Design Review Committee. → Verify the double storey zones (Erven 1, 26 to 38, 41 and 64 to 67; Erven 10 to 16 and 79) through simulations from Viewpoints 1, 2, 6 and 7, and restrict erven to single storey, or set the upper floor back, where they would break the skyline or loom over existing houses. → Retain the single storey restriction and the 1.0 m platform limit on the ridge line erven. → On erven bordering Erf 80, observe the 3.0 m building line, keep boundaries visually open, and plant erf edges with locally indigenous species. → Dark grey or charcoal matt roofs; warm off-white, stone or timber walls; no brilliant white or reflective finishes. → Revise the Master Landscape Plan palette to locally indigenous species suited to exposed coastal conditions, and limit lawn. → A planted buffer of naturally occurring species facing existing houses on Noreen Street and Adelle Street. → Low-level bollard street lighting only, with no lighting on the edge of Erf 80 and no floodlighting, uplighting or coloured lighting. → Manage Erf 80 as a conservation area, with alien clearing and fire management and no private access, structures or clearing. → Maintain landscape planting and monitor lighting compliance.
Residual impacts:	A development that fits in with the local townscape and is seen as a contained extension of the town. The residual impact arises mainly from the transformation of natural fynbos and the elevated position, which cannot be fully screened.
Cumulative impact post mitigation:	Low – Medium
Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	Low – Medium Negative
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**14. TRAFFIC IMPACT**

	Additional residential traffic on Adelle Street and the Main Road (MR261); Industria Road; Argonauta Avenue intersection, with a risk of congestion and road-safety conflict at the site access.
Nature of impact:	Negative
Extent and duration of impact:	Local; Long-term (for the life of the development)
Consequence of impact or risk:	Main Road intersection: LOS A in 2026, rising to LOS B (AM) and LOS C (PM) in 2031 with the development. Site access: LOS A (delay about 8 s; V/C 0.05 or less). Stacking of about 30 m is available against 21 m required. Shoulder sight distance exceeds the 120 m required in both directions.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Low
Indirect impacts:	Increased pedestrian and cyclist use of Adelle Street, which has no NMT facilities (the TIA recommends none). Additional demand on public transport along Main Road (the TIA recommends no dedicated facilities).
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:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ A single priority stop-controlled access off Adelle Street, about 90 m south of Lynn Street, with single ingress and egress lanes, as assessed in the TIA.

	→ A minimum stacking distance of 21 m between Adelle Street and any access gate or control point (about 30 m available). → Shoulder sight distance of at least 120 m kept clear of walls, signage, landscaping and parked vehicles in both directions. → Parking provided in accordance with the Cape Agulhas Municipality zoning scheme. → Internal roads within 13 m road reserves (Erf 72), designed for passenger, refuse and emergency vehicles.
Residual impacts:	A marginal increase in peak-hour delay at the Main Road intersection, within acceptable levels of service, with short periods of congestion during the Easter peak.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	Low Negative
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**15. SOCIOECONOMIC IMPACTS** Provision of 72 serviced single residential erven within the Struisbaai Urban Edge, with associated long-term contributions to the municipal revenue base and local economy, and ongoing employment in estate management and conservation management of Erf 80.
Nature of impact:	Positive
Extent and duration of impact:	Local to regional (Cape Agulhas Municipality); long-term for the life of the development.
Consequence of impact or risk:	Increased supply of residential opportunities on land within the Urban Edge identified for future residential use in the Cape Agulhas Municipality SDF (2022–2027); additional municipal revenue from property rates, service charges and bulk contribution levies; and ongoing employment in security, garden and landscape maintenance, and the management of Erf 80 (alien clearing, fire management and rehabilitation).
Probability of occurrence:	Probable

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:	Increased demand on municipal water, sewer and solid waste services, within the capacity confirmed by the Cape Agulhas Municipality; increased local spending by residents and visitors.
Cumulative impact prior to mitigation:	Contributes positively to the residential growth of Struisbaai in accordance with the municipal SDF.
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:	High
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Preference must be given to local service providers and labour from the Cape Agulhas area for estate management, maintenance and the conservation management of Erf 80, where feasible. → The Homeowners' Association must be constituted with a funded and enforceable responsibility for the long-term management of Erf 80. → Bulk contribution levies and connection fees must be paid to the Cape Agulhas Municipality in accordance with its requirements. → Water-saving devices and rainwater harvesting must be implemented, as recommended in the Civil Engineering Report, to limit the demand on municipal water supply.
Residual impacts:	Positive. Long-term residential, revenue and employment benefits to the local economy.
Cumulative impact post mitigation:	Medium
Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	Medium - high Positive

POST-CONSTRUCTION PHASE	
Potential impact and risk:	**16. OPERATIONAL DISTURBANCE AND DEGRADATION OF RETAINED FAUNAL HABITAT** Residential occupation introduces artificial lighting, noise, traffic, human activity, domestic animals, alien plant spread and other edge effects that may reduce the quality and use of retained habitat, including the Erf 80 Nature Conservation Area.
Nature of impact:	Negative
Extent and duration of impact:	Local, extending from the developed footprint into retained natural habitat through edge effects; long-term for the operational life of the development.
Consequence of impact or risk:	Reduced quality and use of retained habitat by Species of Conservation Concern and other fauna, especially ground-dwelling species, nocturnal fauna, reptiles, invertebrates and disturbance-sensitive birds. Magnitude is Medium–High before mitigation.
Probability of occurrence:	Highly Probable
Degree to which the impact may cause irreplaceable loss of resources:	Medium
Degree to which the impact can be reversed:	Medium
Indirect impacts:	Predation of reptiles, small mammals and ground-dwelling birds by domestic cats and dogs; road mortality of tortoises, snakes and other slow-moving fauna on internal roads; secondary poisoning of raptors and other predators through rodenticides; light spill affecting nocturnal fauna and insects; nutrient-rich runoff and dumping of garden refuse in Erf 80.
Cumulative impact prior to mitigation:	Adds to existing urban-edge disturbance around Struisbaai. Effective management of Erf 80 and the broader conservation network can reduce cumulative effects.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium – High Negative

Degree to which the impact can be avoided:	Low – Medium
Degree to which the impact can be managed:	Medium – High
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Manage Erf 80 specifically for conservation. No private gardens, structures, storage areas, informal tracks or recreational facilities may encroach into Erf 80, and no indigenous vegetation, rocks or other natural material may be removed from it. → External lighting must be limited to that required for safety and security, and lighting adjacent to Erf 80 must be downward-directed, shielded, warm-spectrum and of the lowest effective intensity; no floodlighting of the conservation-area interface. Motion-activated lighting must be used where continuous illumination is unnecessary. → Free-ranging dogs may not be permitted in Erf 80; dogs adjoining the conservation area must be leashed; free-roaming domestic cats must be prohibited or tightly controlled through estate rules, with a clear mechanism for repeated non-compliance. → A maximum speed of 30 km/h, supported by traffic calming where required, must apply on internal roads adjoining Erf 80 and other retained habitat. Residents must be made aware of the possible presence of tortoises and snakes on roads. → Locally indigenous species must be used in landscaping adjacent to natural habitat; invasive species may not be planted; garden refuse, soil and clippings may not be dumped in Erf 80; irrigation and fertiliser use adjacent to Erf 80 must be managed to prevent nutrient-rich runoff. → Pest control must follow an integrated pest-management approach. Routine broad-spectrum pesticides may not be used in Erf 80, and second-generation anticoagulant rodenticides must be avoided. → Fauna passages through any perimeter fencing must remain functional throughout the operational phase and may not be blocked by landscaping, security modifications or estate management practices. → Ecologically appropriate fire regimes must be maintained where feasible, coordinated with the broader Paapekuilsfontein conservation landscape. → Responsibility for implementation must be assigned to the estate management body, and operational monitoring must address alien vegetation, encroachment, fauna passages, faunal mortality on roads or fencing, domestic

	animals, light spill, dumping and unauthorised access, with adaptive management where impacts exceed those anticipated.
Residual impacts:	Retained habitat remains subject to edge effects and ongoing disturbance, although active management can maintain meaningful ecological function within Erf 80 and the wider conservation network.
Cumulative impact post mitigation:	Medium
Significance rating of impact after mitigation (e.g. Low. Medium, Medium – High, High, or Very-High)	Medium Negative
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**17. BOTANICAL/ECOLOGICAL** **FRAGMENTATION, EDGE EFFECTS AND DISRUPTION OF ECOLOGICAL PROCESSES** Fragmentation, edge effects and disruption of fire, pollination and ant-mediated seed dispersal in the retained Agulhas Limestone Fynbos of Erf 80 and the adjoining RE/281.
Nature of impact:	Negative
Extent and duration of impact:	Site and adjacent RE/281; long-term.
Consequence of impact or risk:	Retained habitat can remain functional if managed as part of the RE/281 conservation area. Fire is likely to be excluded from small conservation areas adjoining development, leading to senescence of the fynbos and failure of recruitment of fire-dependent proteoids, including *Mimetes saxatilis*.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Low – Medium
Degree to which the impact can be reversed:	Partially reversed

Indirect impacts:	Invasion by the Argentine ant (Linepithema humile), which does not disperse fynbos seed; trampling, dumping and informal paths in Erf 80 and RE/281.
Cumulative impact prior to mitigation:	Minor contribution if connectivity with RE/281 is maintained.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	→ Erf 80 must be managed together with the adjoining RE/281 conservation area. → A fire management plan must be prepared in consultation with the local fire protection association and CapeNature, with firebreaks placed on the developed edge rather than in Erf 80, so that ecological burning of Erf 80 together with the adjoining RE/281 remains possible. Individual residents may not undertake burning in Erf 80. → Access to Erf 80 must be controlled, with no private access from residential erven. → Measures to limit the spread of the Argentine ant (inspection of imported soil, plants and building material) and controls on pets and access must be included in the operational 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 Negative
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**18. BOTANICAL/ECOLOGICAL** **SPREAD OF ALIEN INVASIVE PLANTS**

	Spread of alien invasive plants and garden escapes into the retained habitat of Erf 80 and RE/281.
Nature of impact:	Negative
Extent and duration of impact:	Site; Long-term
Consequence of impact or risk:	Degradation of retained habitat. *Acacia cyclops, Acacia saligna* and *Myoporum sp.* are already established on the site.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Medium
Degree to which the impact can be reversed:	Reversible with clearing
Indirect impacts:	Increased fuel load and risk of an unnaturally hot fire.
Cumulative impact prior to mitigation:	Contributes to alien spread into RE/281.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	→ A vigorous alien invasive clearing programme must be implemented on the whole erf before construction and maintained in Erf 80 during the operational phase, with systematic follow-up control. Cut alien material must be removed from the site and not left in situ. → Post-fire recruitment of *Acacia* and other alien vegetation must be actively controlled. → Landscaping of streets, open space and gardens must use locally indigenous species. A list of prohibited invasive garden plants must be included in the Homeowners' Association constitution. → The Master Landscape Plan palette must be revised to remove species not indigenous to South Africa (such as

	Rhaphiolepis indica and *Westringia fruticosa*), in consultation with the botanical specialist. → Alien seedlings and invasive ornamental species spreading from gardens must be controlled before they become established in Erf 80.
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 Negative
DECOMMISSIONING AND CLOSING 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

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**1. ECOLOGICAL/BOTANICAL – LOSS OF NATURAL VEGETATION AND HABITAT** Loss of natural vegetation and habitat (Agulhas Limestone Fynbos and CBA1).
Nature of impact:	Negative. No direct loss. Slow degradation from alien invasion and woodcutting.
Extent and duration of impact:	Site; ongoing.
Consequence of impact or risk:	Gradual decline in the condition of Agulhas Limestone Fynbos.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Low

Degree to which the impact can be reversed:	Reversible with alien clearing
Indirect impacts:	Increased fire hazard from cut alien material left in situ by woodcutters.
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Alien clearing and removal of cut material by the landowner.
Residual impacts:	Low
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low Negative**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**2. ECOLOGICAL/BOTANICAL – LOSS OF PLANT SPECIES OF CONSERVATION CONCERN** Loss of plant Species of Conservation Concern, including *Mimetes saxatilis* (EN) and *Leucospermum patersonii* (VU).
Nature of impact:	Negative. No direct loss. Senescence of long-unburnt fynbos.

Extent and duration of impact:	Site; ongoing.
Consequence of impact or risk:	Possible decline of proteoid populations in the absence of fire.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Reversible with ecological fire
Indirect impacts:	None identified.
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Ecological burning where safe.
Residual impacts:	Low
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**3. FAUNAL – LOSS AND DEGRADATION OF FAUNAL HABITAT** No direct development-related clearing occurs. Habitat condition may progressively deteriorate through continued alien plant invasion and inappropriate or absent fire management.
Nature of impact:	Negative, indirect and chronic under unmanaged conditions.
Extent and duration of impact:	Local, with potential wider consequences if habitat degradation contributes cumulatively to declining habitat condition across the landscape. Long-term while ecological degradation remains unmanaged.
Consequence of impact or risk:	Existing Species of Conservation Concern habitat and other faunal habitat remain present, although habitat quality may decline without active ecological management. Magnitude is Medium under unmanaged conditions, because habitat extent remains but ecological condition may deteriorate progressively.
Probability of occurrence:	Probable if alien vegetation and fire regimes remain unmanaged.
Degree to which the impact may cause irreplaceable loss of resources:	Low. Habitat extent remains intact.
Degree to which the impact can be reversed:	Moderate to high if ecological management is implemented before major degradation occurs.
Indirect impacts:	Reduced habitat suitability for Species of Conservation Concern as vegetation becomes senescent and invaded.
Cumulative impact prior to mitigation:	No additional development footprint, although unmanaged degradation may still contribute cumulatively to habitat decline.

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Medium Negative**
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Moderate
Degree to which the impact can be mitigated:	Moderate to High
Proposed mitigation:	Implement systematic alien vegetation clearing and follow-up control. Maintain an ecologically appropriate fire regime. Monitor habitat condition and prevent further degradation.
Residual impacts:	Habitat extent remains intact and habitat quality can be maintained or improved with appropriate ecological management.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low Negative**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**4. FAUNAL – HABITAT FRAGMENTATION AND FAUNAL LANDSCAPE CONNECTIVITY** No additional development-related fragmentation occurs. Existing connectivity remains, although alien vegetation expansion and inappropriate fire regimes may progressively reduce habitat quality and landscape permeability.
Nature of impact:	Negative, indirect and chronic under unmanaged conditions.
Extent and duration of impact:	Local to landscape scale. Long-term if ecological degradation continues.

Consequence of impact or risk:	Existing faunal movement routes remain available, provided habitat condition is maintained. Magnitude is Low to Medium under unmanaged conditions: physical connectivity remains, although ecological permeability may decline. No estate security fence is introduced.
Probability of occurrence:	Probable habitat-quality decline without management.
Degree to which the impact may cause irreplaceable loss of resources:	Low. Physical connectivity with RE/281 is retained.
Degree to which the impact can be reversed:	High if alien vegetation and fire management are addressed.
Indirect impacts:	Progressive weakening of existing ecological connections between Erf 3495 and the wider Paapekuilsfontein landscape.
Cumulative impact prior to mitigation:	No additional built fragmentation, although progressive habitat degradation may weaken existing ecological connections.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low Negative**
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Moderate
Degree to which the impact can be mitigated:	High
Proposed mitigation:	Maintain landscape permeability through alien vegetation control, appropriate fire management and protection of natural habitat.
Residual impacts:	Existing connectivity remains largely intact if habitat condition is actively managed.

Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low Negative**
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	**5. FAUNAL – CONSTRUCTION-RELATED DISTURBANCE, DISPLACEMENT AND DIRECT MORTALITY** Not applicable. No construction-related clearing, machinery disturbance or direct construction mortality occurs under the No-Go alternative. Existing habitat remains exposed to alien invasion and ecological-management deficiencies (assessed under No-Go 3 and No-Go 8).
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
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**6. BOTANICAL/ECOLOGICAL – DISRUPTION OF ECOLOGICAL PROCESSES AND CONNECTIVITY** Disruption of ecological processes (fire, pollination and ant-mediated seed dispersal) and connectivity.
Nature of impact:	Negative. No change; fire is already excluded near the urban edge.
Extent and duration of impact:	Site; ongoing.
Consequence of impact or risk:	Continued senescence of the fynbos.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Low

Degree to which the impact can be reversed:	Reversible
Indirect impacts:	None identified.
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Not applicable
Residual impacts:	Low
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative
POST-CONSTRUCTION PHASE	
Potential impact and risk:	**7. BOTANICAL/ECOLOGICAL – SPREAD OF ALIEN INVASIVE PLANTS** Spread of alien invasive plants.
Nature of impact:	Negative. Continued invasion by *Acacia cyclops, Acacia saligna and Myoporum sp*.

Extent and duration of impact:	Site and surrounds; long-term.
Consequence of impact or risk:	Progressive suppression of the fynbos.
Probability of occurrence:	Highly probable
Degree to which the impact may cause irreplaceable loss of resources:	Medium
Degree to which the impact can be reversed:	Reversible with clearing
Indirect impacts:	Increased fuel load.
Cumulative impact prior to mitigation:	Contributes to alien spread into RE/281.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	None without a responsible party. Under the No-Go alternative there is no responsible party for alien clearing.
Residual impacts:	Medium
Cumulative impact post mitigation:	Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative

POST-CONSTRUCTION PHASE	
Potential impact and risk:	**8. FAUNAL – DEGRADATION OF EXISTING FAUNAL HABITAT** No new residential lighting, traffic, pets or other estate-related disturbance is introduced. Existing habitat may nevertheless deteriorate through alien plant invasion and inappropriate fire management if left unmanaged.
Nature of impact:	Negative, indirect and chronic under unmanaged conditions.
Extent and duration of impact:	Local. Long-term if ecological degradation continues.
Consequence of impact or risk:	Existing fauna remain, but habitat suitability may decline as vegetation condition deteriorates. Magnitude is Medium under unmanaged conditions.
Probability of occurrence:	Probable without active management.
Degree to which the impact may cause irreplaceable loss of resources:	Low. Habitat extent remains intact.
Degree to which the impact can be reversed:	Moderate to high if alien vegetation and fire regimes are actively managed.
Indirect impacts:	Reduced habitat suitability for Species of Conservation Concern as vegetation becomes senescent and invaded.
Cumulative impact prior to mitigation:	No additional urban operational pressure, although unmanaged habitat degradation remains a cumulative ecological pressure.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium Negative
Degree to which the impact can be avoided:	Not applicable

Degree to which the impact can be managed:	Moderate
Degree to which the impact can be mitigated:	Moderate to High
Proposed mitigation:	Active alien plant clearing and follow-up control. Appropriate ecological fire management. Ongoing monitoring of habitat condition.
Residual impacts:	Habitat condition can be maintained or improved if appropriate ecological management is implemented.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative

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.

Botanical and Terrestrial Biodiversity Impact Assessment

Findings

- The whole property is covered by Agulhas Limestone Fynbos, which is listed as Critically Endangered. The vegetation on the property is in fair to good condition and is disturbed mainly by tracks, invasive *Acacia* species and branches left by woodcutters.
- The property was surveyed on three occasions (20 December 2022, 10 November 2023 and a spring survey on 4 October 2026), which together cover the main flowering period of Agulhas Limestone Fynbos. The spring survey confirmed that the fynbos is intact over most of the erf, species-rich and structurally typical of the vegetation type, with limestone pavement and outcrop habitat in the central and southern parts. Disturbance is limited to the tracks, the stands of alien Acacia and the woodcutters' debris.
- Almost the entire property is mapped as a Critical Biodiversity Area 1 (CBA1) and as a remnant of a Critically Endangered ecosystem. The fieldwork verified the Screening Tool's ratings of Very High terrestrial biodiversity sensitivity and High plant species sensitivity.
- Eight plant species of conservation concern and limestone endemics were recorded. These include *Mimetes saxatilis* (Endangered), which occurs within the development footprint, is at the eastern limit of its range and cannot be transplanted. They also include *Leucospermum patersonii*, *Gladiolus miniatus* and *Gladiolus variegatus* (all Vulnerable), and the limestone endemics Leucadendron meridianum, Leucadendron muirii, Protea obtusifolia and Leucospermum truncatum (all Near Threatened). As the size of the Mimetes saxatilis population on the erf has not been quantified, the specialist applies the precautionary principle and assumes that the population on the development footprint is of local importance.
- The fynbos depends on fire, pollination and the dispersal of seed by indigenous ants, all of which are vulnerable to edge effects, fire exclusion and invasion by the Argentine ant.
- The property lies at the urban edge of a continuous tract of fynbos on RE/281, so habitat kept in contact with RE/281 is of far greater value than isolated patches.
- The specialist further notes that the residual Medium Negative impact on a Critically Endangered ecosystem warrants consideration of a biodiversity offset. In this regard, the specialist supports the Struisbaai Conservation Master Plan, which proposes approximately 327 ha of conservation areas on RE/281, as the mechanism to address the residual biodiversity impacts of Alternative 2

Potential impacts

- In terms of the alternatives assessed, Alternative 1 was found to result in High Negative residual botanical impacts and is therefore not supported.
- Alternative 2 performs comparatively better, with residual impacts on the vegetation, CBA1 and *Mimetes saxatilis* reduced to Medium Negative.
- Fragmentation impacts can be reduced to Low Negative, provided that Erf 80 is managed in conjunction with the adjoining natural habitat on RE/281. Nevertheless, the loss of Critically Endangered vegetation within a CBA1 and the associated loss of *Mimetes saxatilis* habitat remain significant biodiversity concerns or red flags.

- The specialist does not, however, regard these impacts as fatal flaws for Alternative 2, provided that the recommended mitigation measures and conditions are implemented.

Terrestrial Animal Species Specialist Assessment

Findings

- The Terrestrial Animal Species Specialist Assessment identified the overall Site Ecological Importance (SEI) of the faunal habitats and ecological processes on the property as High. This rating reflects the ecological importance and sensitivity of the habitats and processes present on the site.
- Of the eight animal species of conservation concern identified by the National Web-based Environmental Screening Tool, four were assessed as being of High importance:
    - **Black harrier (Endangered):** The property provides highly suitable foraging habitat and suitable breeding habitat.
    - **Southern adder (Vulnerable):** There is a high likelihood of occurrence on the property.
    - **Scarce mountain copper butterfly (Endangered):** The species may occur given the presence of suitable limestone habitat, buchu host plants and associated ant species.
    - **Faunal landscape connectivity:** The property's connection to the surrounding natural habitat is of high ecological importance.
- Denham's bustard, southern black korhaan and fynbos buttonquail were assigned Medium importance, while the African marsh harrier and yellow-winged agile grasshopper were assessed as having Very Low importance.
- Other faunal species recorded during the site assessment include Cape grysbok, Cape golden mole, angulate tortoise, two gecko species, approximately 20 bird species and the Rûens velvet worm.

Impacts

- Four impact pathways were assessed:
    - Permanent loss of faunal habitat,
    - Habitat fragmentation and loss of connectivity,
    - Construction disturbance and fauna mortality, and
    - Operational disturbance of retained habitat.
- Under Alternative 2, these are Medium–High Negative before mitigation and Medium Negative after mitigation.
- Under Alternative 1, they remain High Negative.

The assessment found that:

- Alternative 1: The residual faunal impacts remain High Negative, even after mitigation, primarily due to the larger development footprint and associated habitat loss and fragmentation.
- Alternative 2: Impacts are initially rated Medium–High Negative before mitigation and are reduced to Medium Negative following the implementation of the recommended mitigation measures. This improvement is attributed to the smaller development footprint, retention of a larger conservation area and maintenance of ecological connectivity with the adjoining natural habitat on RE/281.
- The High Site Ecological Importance rating therefore reflects the conservation value of the site's faunal habitats and ecological processes, while the Medium Negative residual impact rating for Alternative 2 reflects the anticipated significance of the development's impacts after mitigation.

Agricultural Compliance Statement

Findings

- The Screening Tool rates the property as Low to Medium sensitivity for the Agriculture Theme. The Site Sensitivity Verification and Agricultural Compliance Statement (SoilZA, 30 September 2026) verifies the entire property as being of low agricultural sensitivity.

- The cropping potential of the property is limited by the arid climate (mean annual rainfall of approximately 424 mm), the terrain (hilly ridges of old coastal dunes with slopes of up to 25%) and the soils (predominantly shallow sands on hardpan carbonate with a low water-holding capacity). The property and its surroundings have never been used for agricultural production, and there is no potential for viable rain-fed crop production.

Impacts

- The specialist concludes that the development will result in a negligible loss of future agricultural production potential and is acceptable from an agricultural perspective. No agriculture-specific mitigation measures are required.
- Influence on the proposed development
- The findings confirm that the rezoning of the property from Agricultural Zone I will not result in the loss of productive agricultural land. No changes to the layout were required on agricultural grounds.

Heritage Impact Assessment

Findings

- A Notification of Intent to Develop was submitted to Heritage Western Cape (HWC Case No. HWC23083108MS0904). HWC required a Heritage Impact Assessment that includes a Palaeontological Impact Assessment and a Visual Impact Assessment of the cultural landscape. The HIA was undertaken by Ms C. Postlethwayt (November 2026).
- No buildings, structures, graves, burial grounds, known archaeological sites or places associated with living heritage were identified on the property, and the property does not form part of a historically significant settlement or townscape. The Hotagterklip cottages (Provincial Heritage Site) and other formally protected heritage resources lie some distance from the property and will not be affected.
- The property has no intrinsic historical or architectural significance. Although it was subdivided in 2005 from the historical farm Paapekuilsfontein 281, it no longer retains a meaningful historical or social association with the original farm.
- Two elements of cultural significance may be affected by the development:
    - the natural and cultural landscape: the property is of very high contextual significance, given its CBA1 designation, its scientific value as habitat for Mimetes saxatilis and other limestone endemics, and its position on a low rise that forms part of the transition between Struisbaai and the surrounding natural landscape and part of the local skyline when viewed from the north and north-east; and
    - palaeontological resources within the underlying Waenhuiskrans Formation, which is rated Very High on the SAHRIS palaeosensitivity map and Moderate at site level.
- The HIA sets out the following heritage informants: recognise the broader cultural landscape; retain and enhance the coastal sense of place in the form, scale and type of buildings and landscaping; avoid new built skylines visible from the coast and the R319; provide a planted buffer of naturally occurring species between existing neighbours and the new development; retain view lines towards the sea and allow visual permeability at the site boundaries; conserve and integrate the open area on the northern side of the site; and use naturally occurring species in gardens, buffers and open space.

Impacts

- The HIA concludes that, although the visual transformation of the site is unavoidable given the proposed change in land use, it should not result in undue harm to the visual resources, the surrounding environment or the wellbeing of the Struisbaai community, provided that the recommended mitigation measures are implemented and maintained. The HIA and the VIA do not support Alternative 1.

Influence on the proposed development

- Alternative 2 responds directly to the HIA's recommendation to conserve and integrate the open area on the northern side of the property, which is retained as Erf 80.
- The Architectural Guidelines (Appendix G10) were prepared in response to the heritage informants. They restrict the 45 central ridge-line erven to a single storey, limit building coverage to 50% per erf, and prescribe a restrained palette of warm off-white finishes, local stone, weathered timber and dark matt roofs, visually open boundaries along Erf 80 and private open space, and controls on external lighting.
- Final plans are to be generally in accordance with the amended Alternative 2 Preferred Layout and the development guidelines, as mitigated, refined and supported by HWC.

Palaeontological Impact Assessment

Findings

- The Palaeontological Impact Assessment was undertaken by Mr J. Pether. The specialist confirms that amendments to the layout do not affect the recommendations of the PIA.
- The property is underlain by the capping calcrete of the Waenhuiskrans Formation aeolianite, which is rated Very High on the SAHRIS palaeosensitivity map owing to previous fossil bone finds in coastal developments.
- Fossil bones that may occur beneath the property are expected to be of later Quaternary age (approximately 160 000 to 100 000 years old) and to represent mainly the extant fauna, although unexpected or locally extinct species may occur. Such finds would be of moderate scientific importance.
- Because the property lies on an elevated ridge crest, where a spring or vlei is unlikely to have been present, the probability of fossil bones being common is reduced. Hyaena burrow lairs, which can hold rich bone accumulations, are more likely on the eroding slopes of the aeolianite ridges. A field survey is unlikely to locate fossil bones because of the vegetation cover.

Impacts

- Excavations for foundations (approximately 0.6 m deep) and services (up to approximately 1.2 m deep) may expose and damage or destroy fossil material. The impact is rated Medium Negative without mitigation and Medium to High Positive with mitigation, since fossils that would otherwise remain buried could be rescued and made available for scientific study.
- The possible presence of fossils does not have an a priori influence on the decision to proceed with the development, but mitigation measures are essential.

Influence on the proposed development

- The retention of the northern slopes as Erf 80 avoids the part of the property where hyaena burrow lairs are more likely to occur.
- As fossil-bearing deposits cannot be identified or avoided through the layout, the Fossil Finds Procedure is included in the EMPr. Earthworks personnel must be briefed to watch for fossil bones; work must stop at a find; the ECO must notify HWC and the standby palaeontologist; any collection must be undertaken under an HWC permit; and the material must be deposited at a SAHRA/HWC-approved institution at the developer's expense.

Visual Impact Assessment

Findings

- The Visual Impact Assessment was undertaken by Ms A. Bormans of Terra+ Landscape Architects (Draft, 18 November 2026) as a Level 4 VIA, combining aspects of Type A and Type B assessment. It assesses the amended Alternative 2 Preferred Layout (16 November 2026) against the visual indicators established in the 2023 draft VIA.

- The landscape is defined by horizontal lines, from the beach and sea horizon to the low ridges and the even height of the fynbos, with small, low-scale settlements. The site lies within a cultural landscape of medium to high scenic, cultural and historical significance.
- The visual sensitivity of the area is rated Moderate, the Visual Absorption Capacity Low to Moderate and the overall visual intrusion Moderate. Receptor sensitivity is High for the adjoining residential areas. Visual intrusion is High from Viewpoint 1 (Noreen Street) and Moderate to High from Viewpoint 2 (Adelle Street). From Viewpoint 7, Alternative 2 results in low to moderate intrusion, compared with high intrusion under Alternative 1.
- The VIA supports the single storey restriction on the ridge line, but finds that the double storey zones on the northern edge (Erven 1, 26 to 38, 41 and 64 to 67) and the southern edge (Erven 10 to 16 and 79) are the most exposed edges of the development when seen from outside the estate. These zones must be verified through visual simulations from Viewpoints 1, 2, 6 and 7.
- The retention of Erf 80 responds to the visual indicators. The layout only partly responds to the requirements for a planted buffer adjoining existing neighbours and for view lines through the site, and the plant palette of the Master Landscape Plan does not yet respond to the requirement for naturally occurring species.

Impacts

- Alternative 2: the construction phase visual impact is rated Medium Adverse before mitigation and Low Adverse after mitigation; the operational phase visual impact is rated Moderate Adverse before mitigation and Low to Moderate Negative after mitigation.
- Alternative 1: the operational visual impact is rated High Adverse, and Alternative 1 is not supported.
- The VIA recommends the amended Alternative 2 Preferred Layout for approval from a visual impact perspective, subject to the implementation of the recommended architectural and landscape mitigation measures and a further round of assessment once the Architectural Guidelines and 3D simulations have been developed.

Influence on the proposed development

- The retention of the steep, visually exposed northern slope as Erf 80 and the single storey restriction and 1.0 m platform limit on the ridge-line erven are incorporated into the preferred layout and the Architectural Guidelines.
- The double storey zones are to be verified through visual simulations, with affected erven restricted to a single storey, or the upper floor set back, where they would break the skyline or loom over existing houses. The Architectural Guidelines are to be updated to include Erf 79 in the southern double storey zone.
- The Master Landscape Plan (Appendix G11) is to be developed into a detailed Landscape Plan by a registered landscape architect, with a revised palette of locally indigenous species, a planted buffer facing the existing houses on Noreen Street and Adelle Street, and low, open planting within the servitude corridors.
- Roofs are to be dark grey or charcoal and matt, and walls warm off-white, stone or timber. Street lighting is to be low-level bollard lighting only, with no lighting on the edge of Erf 80. The Design Review Committee is to review all house designs, additions and alterations against the guidelines.

Transport Impact Assessment

Findings

- The Transport Impact Assessment was undertaken by Innovative Transport Solutions (October 2026). Access is proposed off Adelle Street, approximately 90 m south of the Lynn Street intersection, with single ingress and egress lanes. Approximately 30 m of stacking distance is available, which exceeds the recommended minimum of 21 m, and the available shoulder sight distance along Adelle Street exceeds the required 120 m in both directions.
- The development is expected to generate an increase in trips in the weekday morning peak hour (18 inbound, 53 outbound) and increased trips in the afternoon peak hour (50 inbound, 21 outbound).
- Under the 2031 total traffic scenario, the Main Road / Industria Road / Argonauta Avenue intersection will operate at LOS B in the morning peak and LOS C in the afternoon peak, and the site access will operate at LOS

A. During the 30th highest hour (Easter peak), the Main Road intersection will operate at capacity (LOS E), with delays of up to approximately 50 seconds for short periods.

Impacts

- The TIA concludes that the transport impact of the development will be low. The existing road network can accommodate the development without road improvements, and the short periods of seasonal congestion do not justify major road or intersection upgrades. No dedicated non-motorised transport or public transport facilities are recommended, and parking is to be provided in accordance with the zoning scheme. The development is supported from a transport engineering perspective.

Influence on the proposed development

- The amended layout provides a single entrance and exit off Adelle Street, consistent with the access arrangement assessed in the TIA. No upgrades to the external road network are proposed.

Electrical Engineering Report

Findings

- The electrical requirements of the development were assessed by Converge Consulting. The load requirement of the development is 227 kVA, which can be supplied from the existing Cape Agulhas Municipality network once the required upgrades, including 11 kV cabling, transformers and metering, have been undertaken.

Influence on the proposed development

- Each erf will be connected underground to the adjacent municipal network on Adelle Street and fitted with an individual municipal prepaid meter. The required network upgrades are set out in the Electrical Engineering Report and are to be implemented in accordance with the requirements of the Cape Agulhas Municipality.

Civil Engineering Roads and Services Report

Findings

- The Cape Agulhas Municipality confirmed in a letter dated 3 October 2025 that municipal water and sewer services are available for the development.
- Water: the development will connect to the existing 160 mm municipal watermain along the western road reserve of Adelle Street, with a bulk water meter. No connections are permitted to the two reservoir supply watermains that traverse the property within registered servitudes, and care is required during construction to avoid damaging them. As the site lies below the municipal reservoirs, no low-pressure problems are expected. Water saving and harvesting measures must be implemented.
- Sewer: the development will be served by a waterborne gravity system connected to the existing 160 mm municipal sewer at the corner of Adelle Street and Santie Street, which drains to the Ocean View Heights pump stations. No pumping is required. The daily dry weather flow is estimated at 0.52 ℓ/s, with an instantaneous peak wet weather flow of 1.55 ℓ/s. The main sewer pipelines will be laid in trenches up to 2.5 m deep.
- Stormwater: the piped system will accommodate the 1:2-year storm and the major system the 1:100-year storm within the road reserves. Attenuation will be based on the post-development flow less the pre-development flow, and runoff will pass through a dissipation, silt and debris trap before discharging to the municipal system in Adelle Street, which drains to the Ocean View Heights attenuation ponds that were designed to receive flows from the property.

Influence on the proposed development

- All services connect to existing municipal networks on the eastern side of the property, so no bulk services need to be extended into the surrounding natural vegetation. The two municipal pipeline servitudes are accommodated over private open space Erven 73 to 77 and Erf 80 and are kept free of structures.
- Each dwelling is required to install a rainwater harvesting tank of at least 5 000 litres. Stormwater attenuation, silt and debris traps, and the protection of the reservoir supply watermains during construction are included in the EMPr.

Summary of how the specialist findings have influenced the proposed development

The specialist findings were applied through the mitigation hierarchy. The principal avoidance measure was the refinement of the layout from Alternative 1 (84 erven) to the preferred Alternative 2 (72 erven). This removed development from the steep northern slope, which the botanical, faunal, heritage, palaeontological and visual specialists all identified as the most sensitive and most visible part of the property, and retained Erf 80 as a single block of natural habitat contiguous with RE/281.

Impacts that cannot be avoided within the Alternative 2 footprint are minimised through the Architectural Guidelines, the Landscape Plan, the alignment of the security fence around the residential component only, and the construction and operational measures of the EMPr. The residual biodiversity impact (Medium Negative) is to be addressed at landscape scale through the Paapekuilsfontein (Struisbaai) Conservation Master Plan (Appendix K) and the Biodiversity Offset Report (Appendix L), subject to the determination of the competent authority.

The following matters remain to be completed before the layout and guidelines are finalised: the spring census of *Mimetes saxatilis* and any resulting adjustment of the Erf 80 boundary; the visual simulations to verify the double storey zones; the update of the Architectural Guidelines (Erf 79, double storey zones, plant palette and lighting); and the revision of the Landscape Plan.

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

Botanical and Terrestrial Biodiversity Impact Assessment

Mitigation measures proposed by the botanical specialist

→ A census of *Mimetes saxatilis* (and other proteoid SCC) on the development footprint and in Erf 80 must be undertaken in spring before the layout is finalised, and the boundary of Erf 80 and the adjacent erven should be adjusted to retain the densest stands where feasible.

→ Erf 80 must be zoned for nature conservation, fenced on its developed edge with fauna permeable fencing, and protected by a title deed restriction or equivalent legal instrument. It should be incorporated into the management of the RE/281 conservation area.

→ The construction footprint must be demarcated before any clearing. No vehicles, stockpiles, spoil or construction camps may be placed in Erf 80.

→ A search and rescue of geophytes, succulents and other transplantable species must be undertaken by a suitably qualified person before clearing, with the plants used for landscaping or relocated to Erf 80 or RE/281. Seed of *M. saxatilis* and other Proteaceae should be collected for propagation by a specialist nursery.

→ Topsoil from the footprint should be stripped and re-used on road verges and private open space to retain the soil seed bank.

→ A vigorous alien invasive clearing programme must be implemented on the whole erf before construction and maintained in Erf 80 during the operational phase. Cut alien material must be removed from the site and not left in situ.

→ Landscaping of streets, private open space and gardens must use locally indigenous species. A list of prohibited invasive garden plants must be included in the home owners' constitution.

→ A fire management plan must be prepared in consultation with the local fire protection association and CapeNature, with firebreaks placed on the developed edge rather than in Erf 80, so that ecological burning of Erf 80 together with the adjoining RE/281 remains possible.

→ Measures to limit the spread of the Argentine ant (inspection of imported soil, plants and building material) and controls on pets and access must be included in the operational EMPr.

Terrestrial Animal Site Sensitivity Verification and Species Specialist Assessment

Mitigation measures proposed by the faunal specialist

Protection and management of Erf 80

→ Erf 80 must be retained and managed primarily for conservation of natural Agulhas Limestone Fynbos and associated faunal habitat.

→ The boundary between Erf 80 and the residential development must be surveyed and clearly demarcated before site establishment and vegetation clearing commence.

→ Erf 80 must be treated as a construction no-go area, apart from approved conservation management activities such as invasive alien plant clearing, rehabilitation, ecological monitoring, fire management and authorised access.

→ No construction camps, contractor lay-down areas, spoil areas, material stockpiles, concrete mixing, temporary vehicle parking, waste-storage areas or construction access routes may be established within Erf 80.

→ Permanent services and infrastructure should remain within the approved development footprint. Infrastructure requiring subsequent disturbance within Erf 80 should be avoided where a technically feasible alternative exists.

→ Private gardens, structures, storage areas, informal tracks or recreational facilities may not progressively encroach into Erf 80.

→ The area should retain the character and ecological function of natural Agulhas Limestone Fynbos and should not progressively be converted into a landscaped recreational park.

Broader Paapekuilsfontein conservation framework

→ The broader Paapekuilfontein Conservation Master Plan should be implemented as a landscape-scale component of the mitigation associated with Erf 3495.

→ Its principal ecological role is to retain and manage substantially larger areas of connected natural habitat than can be secured within Erf 3495 alone. This is particularly important for maintaining faunal movement, dispersal, access to resources, recolonisation and ecological processes across a landscape affected by habitat transformation and fragmentation.

→ Erf 80 should function as part of this broader network. Management of the area should therefore be coordinated with conservation management elsewhere on Paapekuilsfontein, particularly in relation to alien vegetation control, rehabilitation, fire management and maintenance of ecological connectivity.

→ Conservation areas and ecological corridors identified through the broader framework should be clearly delineated and incorporated into appropriate long-term land-management arrangements.

→ Future development within the wider Paapekuilsfontein property should be planned in relation to this conservation network so that ecological connections are not progressively narrowed or lost through successive development proposals.

→ The broader conservation framework provides additional mitigation for cumulative fragmentation and loss of landscape connectivity. Permanent loss of natural habitat within the authorised Erf 3495 development footprint remains a residual impact. The regulatory treatment of the broader conservation measures, including whether any additional conservation mechanism is required, should be determined through the environmental authorisation process by the competent authority, informed by the relevant conservation authorities.

Pre-construction faunal inspection

→ A pre-construction faunal inspection should be undertaken immediately before vegetation clearing commences within each portion of the development footprint.

→ The inspection should be undertaken by a suitably experienced faunal specialist or by the Environmental Control Officer (ECO) following appropriate briefing by the faunal specialist.

→ Searches should concentrate on habitat features likely to shelter terrestrial fauna, including rock slabs, loose rocks, dense shrubs, woody debris, sandy soil and other natural refugia.

→ Particular attention should be given to reptiles, tortoises and other slow-moving or cryptic fauna. Southern Adder (*Bitis armata*) has a high likelihood of occurrence within suitable habitat on Erf 3495, while Angulate Tortoise (*Chersina angulata*) was recorded during the field assessment.

→ Animals encountered within areas scheduled for immediate clearing should be allowed to move away from the disturbance where possible. Slow-moving fauna that cannot safely leave the construction area may be moved a short distance into suitable adjoining natural habitat, subject to applicable legal requirements.

→ If a Southern Adder or another reptile is encountered, work in the immediate area must stop until the animal has moved away or has been safely removed by a competent person. Snakes may not be killed. If an unconfirmed Species of Conservation Concern is encountered within the construction footprint, work in the immediate area should stop and the faunal specialist should be contacted to determine whether additional mitigation or permitting is required.

→ Search-and-rescue must remain a precautionary construction measure and may not be used to justify avoidable clearing of sensitive habitat.

Vegetation clearing and construction footprint

→ Vegetation clearing must remain strictly within the authorised Alternative 2 development footprint.

→ Clearing should proceed progressively and should not extend substantially ahead of construction.

→ Where practicable, vegetation clearing should progress in a manner that allows mobile fauna to move towards retained natural habitat.

→ Natural vegetation, rock slabs, refugia and soil surfaces outside the approved footprint may not be disturbed for construction convenience.

→ Machinery operators must be instructed to stop work when tortoises, snakes or other fauna are observed in the immediate working area.

→ No indigenous fauna may be deliberately killed, collected or removed from the property by contractors or construction personnel.

→ Temporary construction disturbance should be minimised and affected areas rehabilitated as soon as they are no longer required.

Southern Adder and other reptiles

→ Southern Adder is a threatened and range-restricted reptile associated with coastal lowland fynbos and suitable sandy and rocky microhabitats. Suitable habitat occurs within Erf 3495 and the likelihood of occurrence was assessed as high.
→ Rock slabs, loose rocks, dense shrub refugia and other suitable microhabitats within areas scheduled for clearing should be inspected immediately before disturbance.
→ Natural rocky refugia within Erf 80 must remain undisturbed except where disturbance is specifically required for approved conservation management.
→ Rocks may not be removed from Erf 80 for landscaping, retaining walls or private gardens.
→ Construction personnel must be informed that snakes/reptiles may not be killed. The EMPr should include a procedure for safe snake removal and contact details for a competent snake handler.
→ Tortoises and other slow-moving reptiles encountered within active construction areas should be moved out of immediate danger into suitable adjoining habitat.

Threatened and ground-nesting birds

→ Several bird SCC assessed for Erf 3495 are associated with lowland fynbos, open natural vegetation or ground-nesting habitats, including Black Harrier, Denham's Bustard, Southern Black Korhaan and Fynbos Buttonquail.
→ Natural vegetation scheduled for clearing should be checked immediately beforehand for active nests or obvious breeding activity.
→ If an active indigenous bird nest is located within or immediately adjacent to the clearing area, disturbance around the nest should stop and an appropriate exclusion area should be maintained until breeding has been completed.
→ The size of the exclusion area should be determined according to the species, nest location and nature of the surrounding disturbance.
→ Active nests may not be deliberately destroyed.
→ Construction personnel may not deliberately disturb, capture or interfere with birds using the development footprint or retained natural areas.
→ Vegetation clearing should avoid the active breeding season where practicable.

Scarce Mountain Copper and other invertebrate habitat

→ The Scarce Mountain Copper is a highly range-restricted threatened butterfly dependent on suitable vegetation and associated ecological interactions. Avoidance of unnecessary habitat clearing therefore remains the primary mitigation measure for this receptor.
→ Known or subsequently identified important host-plant or associated microhabitat patches within retained natural habitat must be protected.
→ Alien clearing and restoration within Erf 80 should retain indigenous vegetation structure and minimise unnecessary disturbance of soil and intact microhabitats.
→ Routine broad-spectrum insecticide application may not take place within Erf 80.

→ Fire management should retain the natural vegetation dynamics and post-fire habitat mosaics required by fynbos-associated invertebrates.

Cape Golden Mole and soil disturbance

→ Cape Golden Mole (*Chrysochloris asiatica*) was recorded during the field assessment. Its relevance to mitigation arises primarily from excavation, soil disturbance and compaction within the development footprint.
→ Unnecessary grading, excavation, soil compaction and vehicle movement outside the authorised development footprint must be prohibited.
→ Where active subterranean fauna are encountered during excavation, work in the immediate area should pause sufficiently to allow the animal to move away or for appropriate specialist advice to be obtained.
→ Soil disturbance within Erf 80 should be restricted to activities required for approved ecological restoration and management.

Landscape connectivity and security fencing

→ Erf 3495 forms part of a wider connected natural landscape and Erf 80 is intended to contribute to this landscape-scale conservation network.
→ Cape Grysbok was recorded on the property, and Angulate Tortoise, reptiles and other terrestrial fauna also depend on the ability to move between suitable habitat patches. Maintenance of landscape permeability is therefore relevant both to larger terrestrial animals and to smaller ground-dwelling fauna.
→ The development is proposed as an access-controlled private residential estate and security fencing will form part of the development.
→ From a faunal perspective, the preferred configuration is for the security perimeter to enclose the residential development and associated private infrastructure while leaving Erf 80 connected to adjoining natural habitat within the broader Paapekuilsfontein conservation landscape.
→ This configuration should be incorporated into the final fencing design where practicable. It retains a direct ecological connection between Erf 80 and the wider conservation network and avoids turning the conservation area into an isolated habitat patch within the estate.
→ If security fencing must cross an ecological connection between Erf 80 and adjoining natural habitat, appropriate fauna-permeability measures should be incorporated. The dimensions, spacing and location of fauna passages should respond to the terrestrial fauna likely to use the interface.
→ Fauna-permeability measures should accommodate smaller terrestrial species and, where feasible, larger animals such as Cape Grysbok.
→ Fauna passages must remain functional throughout the operational phase and may not subsequently be blocked by landscaping, security modifications or estate management practices.
→ Any electrification must be designed so that designated fauna passages do not create mortality risks.
→ Solid walls should be avoided along conservation interfaces where a permeable security treatment can provide the required security function.
→ The final fence layout should also consider the potential movement connection towards municipal open-space areas to the north-east of Erf 3495.
→ Where the full Erf 3495 boundary, including Erf 80, is enclosed within the security perimeter, fauna-permeable design can reduce the impact but will not fully reproduce the ecological permeability of a direct unfenced connection. This configuration therefore remains less favourable from a faunal perspective.

Roads and vehicle movement

→ Construction vehicles must remain on approved routes and within the authorised construction area.
→ Internal estate roads adjoining Erf 80 and other retained natural habitat should operate at low speeds. A maximum speed of 30 km/h is recommended for these areas.
→ Traffic-calming measures should be incorporated where required to achieve low operating speeds.

→ Construction personnel and future residents should be made aware of the possible presence of tortoises, snakes and other slow-moving fauna on internal roads.
→ Animals encountered on roads should be allowed to cross safely where this can be done without creating a safety risk.
→ Off-road driving within Erf 80 must be prohibited except where required for approved conservation management.

Trenches, excavations and entrapment risks

→ Open trenches, service excavations and other steep-sided excavations can trap reptiles, small mammals and other terrestrial fauna.
→ Excavations should be closed or backfilled as soon as practicable. Where excavations remain open overnight, suitable escape opportunities should be provided using sloped soil ramps, boards or another effective means of egress.
→ Open excavations should be inspected before work begins each morning and before backfilling.
→ Animals found trapped in excavations must be safely removed before construction continues.
→ Pipes and other hollow construction materials stored on site should be capped or inspected before use.

Alien vegetation management

→ Alien vegetation is already an important source of habitat degradation on Erf 3495, particularly Acacia cyclops and, to a lesser extent, Acacia saligna.
→ A coordinated alien vegetation management programme should be implemented within Erf 80 and other retained natural habitat.
→ Initial clearing must be followed by systematic follow-up control. One-off clearing will not provide an adequate ecological outcome.
→ Alien clearing should minimise unnecessary disturbance to indigenous vegetation, natural soil surfaces and faunal refugia.
→ Dense alien stands may be cleared progressively where this assists fauna displacement and limits abrupt removal of all cover.
→ Herbicide application, where required, should be targeted and should avoid unnecessary impacts on surrounding indigenous vegetation.
→ Alien seedlings and invasive ornamental species spreading from residential gardens must be controlled before they become established within Erf 80.
→ Garden refuse may not be dumped within the conservation area.
→ Alien vegetation management within Erf 80 should be coordinated with management across the broader Paapekuilsfontein conservation landscape.

Fire management

→ Agulhas Limestone Fynbos is a fire-dependent ecosystem and appropriate fire regimes are important for maintaining vegetation structure, ecological succession and habitat suitable for several faunal receptors assessed in this report.
→ Erf 80 should be incorporated into a broader ecological fire-management approach for the Paapekuilsfontein conservation landscape.
→ Long-term exclusion of fire should be avoided where this results in ecologically inappropriate vegetation senescence and declining habitat quality.
→ Burning should be planned according to vegetation condition, fuel age and ecological requirements, while complying with applicable fire legislation and safety requirements.
→ Individual residents may not undertake burning within Erf 80.

→ Firebreaks and other fire-management infrastructure should be positioned to minimise unnecessary additional loss of natural vegetation.
→ Post-fire recruitment of Acacia and other alien vegetation must be actively controlled.
→ Vegetation recovery following fire should be monitored to ensure that the conservation area returns to indigenous fynbos and is not progressively replaced by invasive vegetation.

Artificial lighting

→ Artificial lighting can affect nocturnal fauna, insects and birds and should be carefully controlled along the interface between the residential estate and retained natural habitat.
→ External lighting should be limited to that required for safety and security.
→ Lighting adjacent to Erf 80 should be downward-directed and shielded to minimise spill into natural habitat.
→ High-intensity floodlighting of the conservation-area interface should be avoided. Security lighting should use the lowest intensity capable of achieving the required security function.
→ Warm-spectrum lighting should be used where practicable.
→ Motion-activated lighting should be used where continuous illumination is unnecessary.

Domestic animals

→ Domestic animals represent a long-term operational risk to reptiles, small mammals and ground-dwelling birds.
→ Free-ranging dogs must not be permitted within Erf 80.
→ Dogs outside private residential erven should be effectively controlled and should be leashed where they have access to areas adjoining the conservation area.
→ Free-roaming domestic cats should be prohibited or tightly controlled through estate rules because of their potential to prey on birds, reptiles, small mammals and invertebrates.
→ Residents may not deliberately encourage domestic animals into Erf 80.
→ Estate management rules should provide a clear mechanism for dealing with repeated non compliance involving domestic animals and conservation areas.

Stormwater and erosion

→ Stormwater from roads and residential areas must be managed so that concentrated runoff does not cause erosion, sedimentation or habitat degradation within Erf 80.
→ Clean stormwater should be dispersed in a manner that maintains natural drainage patterns as far as practicable.
→ Contaminated runoff from roads, construction areas, concrete works or other potentially polluted surfaces may not be discharged directly into retained natural habitat.
→ Stormwater structures should avoid creating permanent traps for terrestrial fauna.
→ Erosion developing along the development–conservation interface must be repaired promptly and affected areas rehabilitated.

Landscaping and gardens

→ Landscaping within the residential estate should support the ecological objectives of the development and reduce the risk of secondary degradation of Erf 80.
→ Locally indigenous species should be strongly favoured, particularly in private open spaces and gardens adjoining natural habitat.
→ Invasive or potentially invasive plant species may not be planted.
→ Garden refuse, soil, lawn clippings and other landscaping material may not be dumped within Erf 80.
→ Residents may not remove indigenous vegetation, rocks or other natural material from Erf 80 for landscaping purposes.

→ Irrigation and fertiliser use adjacent to Erf 80 should be managed so that nutrient-rich runoff does not enter the conservation area.

Pesticides and rodenticides

→ Pest control within the estate should follow an integrated pest-management approach.
→ Routine broad-spectrum pesticide application should be avoided adjacent to Erf 80 and may not be undertaken within the conservation area.
→ Second-generation anticoagulant rodenticides should be avoided because poisoned rodents may create secondary poisoning risks for raptors and other predators.
→ Where rodent control is necessary, methods that minimise secondary poisoning and risks to non-target fauna should be used.
→ Herbicide use within Erf 80 should be limited to targeted invasive alien vegetation management.

Waste and pollution

→ No spoil, rubble, household waste, garden waste or construction material may be deposited within Erf 80.
→ Construction waste must be collected and removed to an authorised disposal facility.
→ Food waste should be stored securely to avoid attracting scavenging fauna.
→ Concrete wash-water, fuels, oils and other pollutants may not be discharged onto natural soil or vegetation.
→ Fuel and hazardous substances must be appropriately contained and stored away from retained natural habitat.
→ Any spill must be contained and cleaned immediately.

Rehabilitation of temporary disturbance

→ Areas disturbed temporarily during construction must be rehabilitated as soon as they are no longer required.
→ Topsoil from temporarily disturbed natural areas should be retained separately where practicable and reused during rehabilitation.
→ Rehabilitation should use locally appropriate indigenous vegetation characteristic of Agulhas Limestone Fynbos.
→ No invasive species may be used for rehabilitation.
→ Natural recolonisation should be encouraged where surrounding indigenous vegetation provides an adequate seed source.
→ Compacted soil should be loosened where necessary before rehabilitation.
→ Rehabilitated areas should be monitored for erosion, poor vegetation establishment and invasive alien plant recruitment and should receive follow-up treatment where required.

Environmental induction and compliance

→ All construction personnel must receive environmental induction before commencing work.
→ Induction should cover the ecological sensitivity of Agulhas Limestone Fynbos, the status of Erf 80 as a conservation/no-go area, the potential occurrence of threatened fauna, procedures for animals encountered during construction, prohibition on killing snakes and other fauna and restrictions on access to retained natural habitat.
→ The ECO should maintain records of significant fauna encountered during construction, rescue or relocation events, faunal mortality and unauthorised disturbance of Erf 80.
→ Deliberate killing of indigenous fauna or repeated unauthorised disturbance of the conservation area must be treated as environmental non-compliance.
→ The faunal specialist should be contacted where unexpected ecological issues arise that cannot be adequately addressed through the approved EMPr.

Long-term management and monitoring

→ Retention of Erf 80 on the development layout will only provide a meaningful conservation outcome if the area is actively managed over the long term.
→ Responsibility for implementation should be clearly assigned to the estate management body or another designated land-management entity.
→ Long-term management should address invasive alien vegetation, rehabilitation, fire, access control, fencing and fauna permeability, erosion, domestic animals, waste and general habitat condition.
→ Management of Erf 80 should be coordinated with conservation management on the broader Paapekuilsfontein property.

Operational monitoring should include:

- alien vegetation condition and follow-up control;
- rehabilitation success;
- erosion and stormwater impacts;
- encroachment from adjoining residential areas;
- functionality of fauna passages associated with perimeter fencing;
- evidence of faunal mortality associated with roads or fencing;
- effects of domestic animals;
- excessive light spill into natural habitat;
- dumping or unauthorised access; and
- emerging ecological issues requiring corrective management.

Where monitoring identifies impacts greater than anticipated, management should be adapted. Corrective measures may include modification of fencing or fauna passages, additional alien clearing, rehabilitation, changes to lighting, improved erosion control or stricter management of access and domestic animals.

Heritage Impact Assessment

Mitigation measures recommended in the HIA

Palaeontology

→ The possible presence of fossils in the subsurface does not have an a priori influence on the decision to proceed with the proposed development. The potential impact has a moderate influence upon the proposed project, consisting of implemented mitigation measures recommended below, to be followed during the Construction Phases.
→ It is not feasible for a specialist monitor to be continuously present during the Construction Phases, when fossil bones may be unearthed at any time. The rescue of fossil bones during earth works critically depends on spotting this material as it is uncovered during digging. For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP) is included in the Environmental Management Plan (EMP) for the proposed development.
→ The field supervisor/foreman and workers involved in excavations must be informed of the need to watch for fossil bones and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find.
→ A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require

rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC.

→ The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.

Botanical

The following mitigation measures apply to Alternative 2. They must be included in the Environmental Management Programme (EMPr).

→ A census of *Mimetes saxatilis* (and other proteoid SCC) on the development footprint and in Erf 80 must be undertaken in spring before the layout is finalised, and the boundary of Erf 80 and the adjacent erven should be adjusted to retain the densest stands where feasible.

→ Erf 80 must be zoned for nature conservation, fenced on its developed edge with fauna-permeable fencing, and protected by a title deed restriction or equivalent legal instrument. It should be incorporated into the management of the RE/281 conservation area.

→ The construction footprint must be demarcated before any clearing. No vehicles, stockpiles, spoil or construction camps may be placed in Erf 80.

→ A search and rescue of geophytes, succulents and other transplantable species must be undertaken by a suitably qualified person before clearing, with the plants used for landscaping or relocated to Erf 80 or RE/281. Seed of *M. saxatilis* and other Proteaceae should be collected for propagation by a specialist nursery.

→ Topsoil from the footprint should be stripped and re-used on road verges and private open space to retain the soil seed bank.

→ A vigorous alien invasive clearing programme must be implemented on the whole erf before construction and maintained in Erf 80 during the operational phase. Cut alien material must be removed from the site and not left in situ.

→ Landscaping of streets, private open space and gardens must use locally indigenous species. A list of prohibited invasive garden plants must be included in the home owners' constitution.

→ A fire management plan must be prepared in consultation with the local fire protection association and CapeNature, with firebreaks placed on the developed edge rather than in Erf 80, so that ecological burning of Erf 80 together with the adjoining RE/281 remains possible.

→ Measures to limit the spread of the Argentine ant (inspection of imported soil, plants and building material) and controls on pets and access must be included in the operational EMPr.

Visual

It is recommended that the Master Landscape Plan be developed into a detailed Landscape Plan by a Registered Professional Landscape Architect prior to construction. This plan should typically address the following:

→ Existing vegetation to be retained on Erf 80, Erf 78, the open space corridors and the erf edges, and the method of protection during construction

→ Plant rescue and the reuse of topsoil and seed-bearing material in rehabilitation

→ A planting palette of locally indigenous coastal fynbos and thicket species suited to the limestone and sand conditions and the wind exposure of the site.

→ Street and open space planting that is low and open in character, so that the servitude corridors remain view lines.

→ Lighting specifications for streets and the open space, including fixture shielding and colour temperature

Mitigation: Specific Measures Phase 1

Planning, Design and Construction

→ The Architectural Guidelines must be adopted as a condition of approval and enforced through the Design Review Committee.
→ The northern double storey zone (Erven 1, 26 to 38, 41 and 64 to 67) and the southern double storey zone (Erven 10 to 16 and 79) must be verified through the Google Earth Pro simulations. Where double storey houses would break the skyline from Viewpoints 6 and 7, or would loom over the existing houses from Viewpoints 1 and 2, the affected erven must be restricted to single storey, or the upper floor must be set back from the slope edge so that it is not seen against the sky.
→ The single storey restriction and the 1.0 m platform limit on the ridge line erven (approximately Erven 4, 5, 22, 23, 44, 62 and 69) must be retained.
→ On erven bordering Erf 80, buildings must observe the 3.0 m building line, boundaries must be visually open, and the erf edge must be planted with locally indigenous species continuous with the conservation area.
→ Roofs must be dark grey or charcoal and matt; walls must be warm off-white, stone or timber.
→ Brilliant white walls and reflective finishes must not be permitted, particularly on elevations facing north and north-east.
→ The plant palette of the Master Landscape Plan must be revised. Species not indigenous to South Africa, such as *Rhaphiolepis indica* and *Westringia fruticosa*, should be removed, and riverine and forest trees (such as *Combretum erythrophyllum, Syzygium spp.* and *Curtisia dentata*) should be replaced with species suited to the exposed coastal conditions of the Agulhas plain, in consultation with the botanical specialist. Lawn should be limited as proposed in the guidelines, and the extensive lawns and hydrangeas shown in the renders should not be implemented.
→ A planted buffer of naturally occurring species should be provided on the erf edges facing the existing houses on Noreen Street and Adelle Street, where possible within the street building lines.
→ Street lighting should be low-level bollard lighting only, with no lighting on the edge of Erf 80. No floodlighting, uplighting or coloured lighting should be permitted.
→ Clearance must be limited to the construction zone of each erf. Erf 80 and the open space must be fenced off during construction, and no stockpiling, access or dumping may take place there.

Phase 2: Operational

→ Erf 80 must be managed as a conservation area, with alien clearing and fire management, and no private access, structures or clearing.
→ Landscape planting must be maintained and replaced where establishment fails.
→ The Design Review Committee must review all house designs, including additions and alterations, against the guidelines and the recommendations of this report.
→ Lighting must be monitored for compliance with the guidelines.

Palaeontological Impact Assessment

Mitigation measures recommended by the palaeontological specialist;

The possible presence of fossils in the subsurface does not have an a priori influence on the decision to proceed with the proposed development. However, mitigation measures are essential. The potential impact has a moderate influence upon the proposed project, consisting of implemented mitigation measures recommended below, to be followed during the Construction Phase.

→ It is not feasible for a specialist monitor to be continuously present during the Construction Phases, when fossils may be unearthed at any time. The rescue of fossil bones during earth works critically depends on spotting this material as it is uncovered during digging.
→ For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossils as excavations are being made.
→ It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the proposed development.

→ The Fossil Finds Procedure included as Appendix 2 provides guidelines to be followed in the event of fossil bone finds in the excavations. The works supervisor/foreman and workers involved in excavating the building foundations, infrastructure trenches and stormwater drainage must be informed of the need to watch for fossils and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find.

→ If a significant occurrence of fossil bones in a palaeontological context is discovered a professional palaeontologist must be appointed to collect them and to record their contexts. Said palaeontologist must also undertake the recording of the stratigraphic context and sedimentary geometry of the exposure, the sampling of ambient small fossil content and the compilation of the report for distribution to Heritage Western Cape, SAHRA, the approved curatorial institution and local heritage interest groups.

→ A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.

Visual Impact Assessment

Mitigation measures recommended by the visual specialist;

It is recommended that the Master Landscape Plan be developed into a detailed Landscape Plan by a Registered Professional Landscape Architect prior to construction. This plan should typically address the following:

→ Existing vegetation to be retained on Erf 80, Erf 78, the open space corridors and the erf edges, and the method of protection during construction

→ Plant rescue and the reuse of topsoil and seed-bearing material in rehabilitation

→ A planting palette of locally indigenous coastal fynbos and thicket species suited to the limestone and sand conditions and the wind exposure of the site

→ Street and open space planting that is low and open in character, so that the servitude corridors remain view lines.

→ Lighting specifications for streets and the open space, including fixture shielding and colour temperature

Phase 1: Planning, Design and Construction

→ The Architectural Guidelines must be adopted as a condition of approval and enforced through the Design Review Committee.

→ The northern double storey zone (Erven 1, 26 to 38, 41 and 64 to 67) and the southern double storey zone (Erven 10 to 16 and 79) must be verified through the Google Earth Pro simulations. Where double storey houses would break the skyline from Viewpoints 6 and 7 or would loom over the existing houses from Viewpoints 1 and 2, the affected erven must be restricted to single storey, or the upper floor must be set back from the slope edge so that it is not seen against the sky.

→ The single storey restriction and the 1.0 m platform limit on the ridge line erven (approximately Erven 4, 5, 22, 23, 44, 62 and 69) must be retained.

→ On erven bordering Erf 80, buildings must observe the 3.0 m building line, boundaries must be visually open, and the erf edge must be planted with locally indigenous species continuous with the conservation area.

→ Roofs must be dark grey or charcoal and matt; walls must be warm off-white, stone or timber. Brilliant white walls and reflective finishes must not be permitted, particularly on elevations facing north and north-east.

→ The plant palette of the Master Landscape Plan must be revised. Species not indigenous to South Africa, such as *Rhaphiolepis indica* and *Westringia fruticosa*, should be removed, and riverine and forest trees (such as *Combretum erythrophyllum, Syzygium spp*. and *Curtisia dentata*) should be replaced with species suited to the exposed coastal conditions of the Agulhas plain, in consultation with the botanical specialist. Lawn should be limited as proposed in the guidelines, and the extensive lawns and hydrangeas shown in the renders should not be implemented.
→ A planted buffer of naturally occurring species should be provided on the erf edges facing the existing houses on Noreen Street and Adelle Street, where possible within the street building lines.
→ Street lighting should be low-level bollard lighting only, with no lighting on the edge of Erf 80. No floodlighting, uplighting or coloured lighting should be permitted.
→ Clearance must be limited to the construction zone of each erf. Erf 80 and the open space must be fenced off during construction, and no stockpiling, access or dumping may take place there

Phase 2: Operational

→ Erf 80 must be managed as a conservation area, with alien clearing and fire management, and no private access, structures or clearing.
→ Landscape planting must be maintained and replaced where establishment fails.
→ The Design Review Committee must review all house designs, including additions and alterations, against the guidelines and the recommendations of this report.
→ Lighting must be monitored for compliance with the guidelines

Traffic Impact Assessment

Mitigation measures recommended by the transport specialist

→ Parking should be provided in accordance with the local zoning scheme requirements.

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

None that the EAP is aware of.

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

The surrounding communities that may be affected by the proposed development are, in order of how directly they would be affected:

- the residents of the existing dwellings that adjoin Erf 3495 along Adelle Street and Noreen Street;
- the wider Struisbaai community;
- motorists and visitors using the R319 and Main Road (MR261), the main approach into town.

Based on the findings of the specialist studies, the development is expected to have the following positive and negative impacts on these communities.

Visual impact and change in sense of place

The Visual Impact Assessment findings that the proposed development will turn a natural, vegetated limestone ridge into a residential area. Residents adjoining the property will see the greatest change. The visual intrusion is rated high from Viewpoint 1 and moderate to high from Viewpoint 2, and these residents will lose some of their

natural outlook across the site. Seen from further away, the development will appear as an extension of the existing built edge of Struisbaai.

The VIA rates the visual impact after mitigation as low adverse during construction and low to moderate negative during operation, provided that the following mitigation is implemented:

→ the steep and highly visible northern slope is retained as the Erf 80 Nature Conservation Area;

→ building heights are restricted to a single storey on the ridge;

→ the double-storey zones are tested through visual simulations before the Architectural Guidelines are finalised;

→ dark, matt roof colours and muted wall finishes are used;

→ a planted indigenous buffer is established adjoining the existing dwellings;

→ external lighting is low-level and shielded, to protect the dark night sky.

The Heritage Impact Assessment (Postlethwayt, 2026) recommends that the low-scale coastal character of Struisbaai be maintained. The Architectural Guidelines give effect to this through controls on height, form, materials and colour (Refer to **Appendix G10**).

Construction-phase nuisance

During construction, nearby residents may be affected by noise, dust, construction vehicles, hoarding and temporary lighting. The civil services and internal roads are expected to take two years to complete. After that, individual dwellings will be built intermittently over several years as erven are sold, so these nuisance impacts will recur from time to time rather than occurring all at once.

The nuisance impact is rated medium before mitigation and low after mitigation. The Environmental Management Programme controls it by:

- restricting working hours;
- requiring dust suppression and noise management;
- confining activities to demarcated working areas;
- managing waste and controlling lighting;
- managing construction traffic;
- fencing off Erf 80 as a no-go area.

Traffic and access

The TIA estimates that the 71 residential units will generate about 71 vehicle trips during each weekday peak hour. In the 2031 design year, with the development traffic added, the intersection of Main Road (MR261), Industria Road and Argonauta Avenue is expected to operate at level of service B in the weekday morning peak and C in the afternoon peak. This intersection reaches capacity only for short periods during the Easter holiday peak, which the TIA does not regard as a reason to upgrade it.

Access will be through a single priority-controlled entrance off Adelle Street, about 90 m south of Lynn Street. It is expected to operate at level of service A, with stacking space of about 30 m (21 m is required) and sight distances

of more than 120 m. The TIA concludes that no road upgrades are required and that the transport impact on the surrounding road network and residents is low.

Municipal services

The development will place additional demand on municipal water, sewer, stormwater and solid waste services. The Civil Engineering Services Report (Icon Consulting Engineers) confirms that the Cape Agulhas Municipality has the capacity to supply water and sewer services. The development will be served as follows:

- it will connect to the existing municipal networks in its immediate vicinity;
- stormwater will be attenuated on site to pre-development flows before it is discharged to the municipal system;
- the Municipality will collect refuse.

The development is therefore not expected to reduce the level of service that existing residents receive. Water demand will be reduced by water-saving measures, including:

- a rainwater tank of at least 5 000 litres per dwelling; and
- water-wise fittings.

Heritage resources of community significance

The HIA found no graves, structures, or sites of historical, social or community significance on the property. The development will not affect the nearby Hotagterklip Provincial Heritage Site. The heritage elements that may be affected are the natural and cultural landscape character of the site and possible fossil material in the underlying Waenhuiskrans Formation.

The Palaeontological Impact Assessment (Pether, 2026) notes that, if the Fossil Finds Procedure is implemented, any fossils exposed during excavation can be rescued for scientific study. The impact on palaeontological heritage can therefore become positive.

Fire risk to existing residents (positive impact)

The botanical and faunal assessments (McDonald, 2026; Venter & Swart, 2026) report a high fuel load on the property, made up of senescent fynbos, invasive Acacia species and dry debris left by informal woodcutting, directly next to existing homes. The development will reduce the risk of an uncontrolled, unnaturally hot fire spreading to adjoining properties, which benefits both existing and future residents. It will do so through:

- alien clearing across the property, with the cut material removed;
- a fire management plan prepared with the local fire protection association and CapeNature;
- firebreaks on the developed edge.

Socio-economic impacts (positive impact)

The development will provide 72 serviced residential erven on land that is inside the urban edge and identified for residential use in the Cape Agulhas Spatial Development Framework (2022–2027). Directing growth to this land, rather than to the natural areas around the town, supports the Municipality's growth-management objectives.

The development will create short-term jobs during construction and long-term jobs in:

- estate management and maintenance;
- landscaping and alien clearing;
- security and domestic services.

It will also increase rates and service revenue for the Cape Agulhas Municipality. These benefits can be enhanced by preferring local labour, contractors and suppliers. The EAP rates the socio-economic impact as medium positive after enhancement.

Natural heritage and long-term amenity (positive impact)

If Erf 80 is retained, together with the conservation areas proposed in the Struisbaai Conservation Master Plan (about 327 ha on the Remainder of Farm Paapekuilsfontein No. 281), and these areas are legally secured and actively managed, the natural landscape between Struisbaai and Agulhas National Park would be protected over the long term. This landscape contributes to the sense of place, recreational amenity and tourism value of Struisbaai, from which the wider community benefits.

Conclusion

Overall, the residents who adjoin the property will experience the greatest impact, mainly the change in their outlook and the temporary nuisance during construction. With the recommended mitigation, the specialists rate these impacts as low to moderate.

Impacts on the wider community are low:

- the traffic impact is low;
- no road upgrades are required;
- municipal services are available;
- no heritage resources of community significance will be affected.

The development will also benefit the community by reducing the existing fire risk, providing residential opportunities and employment within the urban edge, and supporting the long-term protection of the surrounding natural landscape.

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.

No dedicated climate change assessment was undertaken for the proposed development. The climate-related risks that are relevant to the development have, however, been identified in the specialist studies and the Civil Engineering Services Report, and the manner in which each has been considered and addressed is set out below.

Water scarcity

The Civil Engineering Services Report notes that the Western Cape has previously experienced water shortages and that these may occur again, and it states that water saving and harvesting measures must be investigated and implemented for the development. This has been addressed through the requirements of the Architectural Guidelines for a rainwater tank of at least 5 000 ℓ per dwelling and water-wise fittings, and through the use of locally indigenous species in landscaping.

Stormwater and rainfall events

The stormwater system has been designed so that the piped underground system accommodates the 1:2-year storm event, while the runoff from the 1:100-year storm event is accommodated within the road reserves and open spaces. Stormwater will be attenuated on site so that post-development flows do not exceed pre-development flows, which the Civil Engineering Services Report states will minimise erosion and stormwater damage and allow the existing groundwater system to be recharged.

Sea-level rise and flooding

The Civil Engineering Services Report confirms that the development has no sea-level or flood effect, as the lowest ground level on the property is 35 m above mean sea level and the property is not situated near any rivers.

Fire

The botanical specialist identifies fire as the principal ecological driver of Agulhas Limestone Fynbos. The vegetation present on Erf 3495 is mature and in places senescent, and the cut *Acacia* material left by woodcutters increases the fuel load and the risk of an unnaturally hot fire. The faunal specialists note that projected decreases in winter rainfall and higher temperatures are likely to exacerbate shifts in the fire regime, vegetation change and habitat degradation. These risks are addressed through the following measures:

- the clearing of invasive alien vegetation across the whole property before construction, with the cut material removed from the site;
- the preparation of a fire management plan in consultation with the local fire protection association and CapeNature, with firebreaks placed on the developed edge so that ecological burning of Erf 80 together with RE/281 remains possible; and
- the proposed exclusion of thatched roofs in the Architectural Guidelines, because of the fire risk in a fynbos setting.

Biodiversity

The faunal specialists identify climate change as one of the threats to the Southern Black Korhaan, noting that projected hotter, drier conditions in the Western Cape may reduce prey availability and vegetation cover and increase predation risk. They also note that fragmentation increases the likelihood of local extinction and limits recolonisation. The retention of Erf 80 as a single block contiguous with the natural habitat on RE/281, and the proposed securing of the conservation areas of the Paapekuilsfontein Conservation Master Plan, are intended to retain larger areas of connected natural habitat, which the faunal specialists consider important for maintaining faunal movement, dispersal, access to resources, recolonisation and ecological processes across the landscape.

Energy use

The Architectural Guidelines require glazing to comply with SANS 10400-XA (energy usage in buildings), encourage solar photovoltaic panels, require solar water heaters to be split systems, and require energy-efficient LED external lighting. The development is located within the urban edge and will be served by existing municipal infrastructure.

The specialists did not identify any further climate change risks specific to the development, and no further climate change adaptation measures were recommended.

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

None that the EAP is aware of.

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

The specialist findings were integrated by identifying where the sensitivities identified by different specialists coincided spatially or functionally, and by selecting measures that address several impacts together. Where standards differed, the more protective standard was adopted. The principal outcomes are as follows.

Erf 80 as an integrated avoidance measure.

The northern portion of the property was independently identified as sensitive by five of the six specialists, as follows:

- Botanical: intact Critically Endangered fynbos contiguous with RE/281.
- Faunal: habitat and landscape connectivity.
- Heritage: the northern open area to be conserved.
- Visual: the most visible slope, forming the local skyline.
- Palaeontological: the slopes where hyaena burrow lairs are more likely to occur.

Retaining this area as Erf 80, a 3.96 ha Nature Conservation Area contiguous with RE/281, addresses all five findings in a single measure.

Integrity of Erf 80 over time

The botanical, faunal and visual requirements for Erf 80 are combined into one set of binding controls, which include the services and infrastructure being are kept within the development footprint. Private gardens, structures and informal tracks may not encroach, natural rock refugia may not be removed, and this area may not be converted into a landscaped park. These controls will be carried into the title conditions and the HOA constitution.

Edge treatment

The faunal requirement for landscape permeability and the visual requirement for open views and dark skies are met through combined controls along the residential edge:

- a single visually open, fauna-permeable fence on the residential edge;
- low-level, shielded lighting, with none along Erf 80;
- low traffic speeds on roads adjoining Erf 80.

Landscaping

The botanical, faunal, heritage and visual requirements are consolidated into one landscape specification: locally indigenous Agulhas Limestone Fynbos species, suited to exposed coastal conditions, kept low and open within the view corridors, and supported by a list of prohibited invasive plants in the HOA constitution.

Alien clearing and fire management.

A single programme of alien clearing, removal of cut material and ecological fire management addresses:

- the principal existing threats to the fynbos and fauna identified by the botanical and faunal specialists;
- the fire risk to the adjoining community;
- the increased fire risk associated with climate change.

Construction sequencing

The pre-clearance faunal inspections, botanical search and rescue, and palaeontological Fossil Finds Procedure are consolidated into a single pre-construction and construction sequence. This sequence is overseen by the ECO and supported by one environmental induction for all personnel.

Access and traffic

The TIA findings were combined with the visual and faunal recommendations. The single access off Adelle Street, with adequate stacking and sight distance, avoids any off-site road upgrades. Landscaping and walls at the entrance will be kept clear of the 120 m sight lines, and low speeds will apply on the internal roads adjoining Erf 80 to reduce road mortality of fauna. Construction traffic controls are integrated with the dust, noise and working-hours controls of the EMPr.

Long-term implementation

The design controls are secured through the Architectural Guidelines and a Design Review Committee. The operational controls are secured through the HOA constitution and title conditions, with the HOA, or a designated management body, responsible for implementation and monitoring.

Landscape scale

The botanical and faunal specialists both found that the residual loss of Critically Endangered vegetation and the cumulative fragmentation of the landscape cannot be resolved within the boundaries of Erf 3495. Their findings are integrated into a single landscape-scale measure, which includes securing and managing the conservation areas of the Struisbaai Conservation Master Plan.

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

The mitigation hierarchy has been applied in sequence throughout the planning and assessment of the proposed development. Priority was given first to avoiding impacts. Where impacts could not be avoided, they were minimised. Disturbed and retained areas are to be rehabilitated. The residual impacts that remain after these steps are to be addressed through landscape-scale conservation measures that serve the purpose of a biodiversity offset.

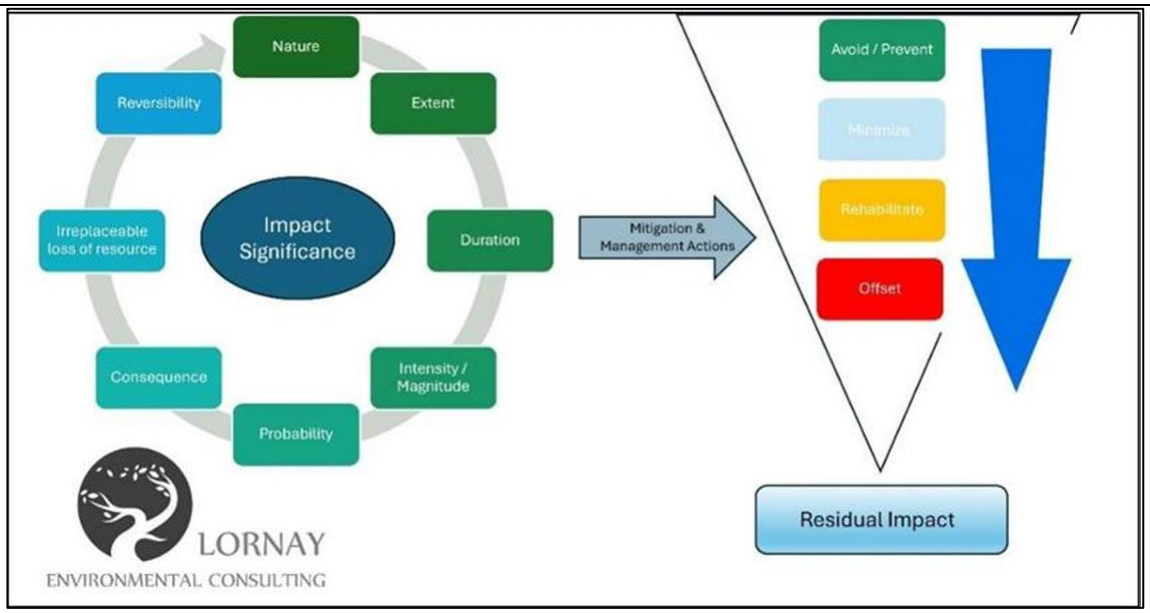


Figure 20: Mitigation hierarchy.

Two layout alternatives and the No-Go alternative were assessed by the specialist team:

- Alternative 1, the initial layout, provides 84 single residential erven across both the southern and northern portions of Erf 3495.
- Alternative 2, the preferred layout, provides 72 single residential erven confined to the southern portion of the property.

Alternative 2 is the direct outcome of applying the mitigation hierarchy to Alternative 1 in response to the specialists' findings. The application of each step, and the reasons why Alternative 2 is the best practicable environmental option, are set out below.

Avoidance

Erf 3495 lies within the Struisbaai Urban Edge. The Cape Agulhas Spatial Development Framework (2022–2027) identifies the property for future residential development, and it adjoins established residential neighbourhoods along Adelle Street and Noreen Street. The development can be served by existing municipal water, sewer and road infrastructure in its immediate vicinity, so no new service corridors or access roads are required through natural vegetation outside the property. The Agricultural Compliance Statement confirmed that the site has low agricultural sensitivity and no viable agricultural potential, so no agricultural resources will be lost. Directing residential growth to this property avoids pressure for development on the more extensive natural land surrounding the town.

Alternative 1 would clear approximately 10.16 ha, or 83.1% of the property, for development. It includes a separate cluster of thirteen erven (Erven 83 to 95) on the steep northern slope, served by an extension of the internal road network (Erven 81 and 82). Under this layout, the Nature Conservation Area (Erf 80) would be reduced to a narrow strip of approximately 2.06 ha (16.9%) between the southern and northern residential clusters, enclosed by development on both sides.

From a botanical perspective, this layout would result in a High Negative residual impact on Critically Endangered Agulhas Limestone Fynbos, on the Critical Biodiversity Area 1 (CBA1) and on the Endangered *Mimetes saxatilis*. The retained strip would be isolated from the natural habitat on the adjoining Remainder of Farm Paapekuilsfontein No. 281 (RE/281) and exposed to edge effects on all sides. On the other hand, the faunal specialists rated the Site Ecological Importance of the faunal habitats and ecological processes as High. They found that Alternative 1 would

result in High Negative residual impacts through habitat loss, fragmentation and the loss of landscape connectivity. Furthermore, the visual impact assessment highlights that the development on the northern slope, which is the most visible part of the site and forms the local skyline, would result in a high adverse visual impact.

Alternative 1 was therefore not supported by the specialists and is not the preferred alternative. In response to these findings, the layout was revised to Alternative 2:

- The thirteen erven and the associated road extension on the northern slope have been removed.
- The development footprint is reduced to approximately 8.15 ha (67%). This avoids a further approximately 2.0 ha of natural vegetation compared with Alternative 1.
- The northern 3.96 ha (32.7%) of the property is retained as Erf 80, a Nature Conservation Area. It forms a single, consolidated block contiguous with the natural habitat on RE/281 along the western and northern boundaries.

The retention of Erf 80 therefore addresses several specialist findings through a single avoidance measure. Alternative 2 also keeps the two 10 m municipal water pipeline servitudes free of structures. The botanical specialist found that *Mimetes saxatilis* does not transplant successfully, so impacts on this species can only be mitigated by avoiding its habitat. Erf 80 will be designated a no-go area for the duration of construction.

Minimisation

Impacts that cannot be avoided within the Alternative 2 footprint will be minimised through design, construction and operational controls taken from the specialist reports. The Architectural Guidelines and the visual and heritage recommendations will minimise the visual impact of the development through:

- controls on building height, platforms, form, materials and colour;
- single-storey restrictions on the ridge;
- dark, matt roofs and muted wall finishes;
- low-level, shielded external lighting.

Visual simulations from Viewpoints 1 to 12 will be prepared to test the proposed double-storey zones. Where an impact on the skyline or overlooking is demonstrated, the affected erven will be restricted to a single storey, or upper floors will be set back. On this basis, the VIA rates the operational visual impact of Alternative 2 as low to moderate negative after mitigation.

On the advice of the faunal specialists, the security perimeter will enclose only the residential component and will not run between Erf 80 and RE/281. A single fauna-permeable, visually open fence will be placed at the interface between the residential component and Erf 80. Together with the following measures, this will minimise edge effects and maintain the movement of fauna between Erf 80 and the wider landscape:

- low traffic speeds (maximum 30 km/h) on internal roads adjoining Erf 80;
- no floodlighting along the conservation interface;
- controls on domestic animals and pesticide use.

The botanical specialist found that, with Erf 80 managed together with the adjoining conservation area on RE/281, the fragmentation impact is reduced from Medium Negative to Low Negative.

The following measures will be implemented through the Environmental Management Programme under the supervision of an independent Environmental Control Officer:

- vegetation clearing confined to the authorised footprint and the construction zone of each erf;

- pre-clearance faunal inspections and nest checks;
- clearing scheduled to avoid the breeding season of ground-nesting birds where possible;
- trench escape measures;
- a survey for the Scarce Mountain Copper butterfly between January and March before clearing.

The Palaeontological Impact Assessment found that the distribution of fossils cannot be predicted, so no further avoidance through the layout is required. Impacts on palaeontological heritage will instead be minimised through the Fossil Finds Procedure, under which earthworks personnel are briefed to recognise and report finds, and a palaeontologist is on standby.

Stormwater will be attenuated on site to pre-development flows, and no services will be routed through Erf 80. The Transport Impact Assessment confirmed that a single access off Adelle Street, operating at level of service A, is sufficient. No off-site road upgrades are required, which avoids further disturbance outside the property.

Rehabilitation and restoration

During clearance of vegetation, topsoil from the development footprint will be stripped and stockpiled. Transplantable plants will be rescued, and seed of Proteaceae, including *Mimetes saxatilis*, will be collected for propagation. Road verges, open space and other disturbed areas will be rehabilitated using the stripped topsoil, rescued plants and locally indigenous Agulhas Limestone Fynbos species. Search and rescue will be limited to the authorised footprint and will not be used to justify clearing that could have been avoided.

Erf 80 consist of invasive *Acacia* species, informal woodcutting and the exclusion of fire. It will be cleared of invasive alien plants, with the cut material removed from the site, and managed under an ecologically appropriate fire regime in accordance with a fire management plan that will be prepared with the local fire protection association. The botanical specialist notes that, with sustained clearing and management, the impact of alien invasive plants within Erf 80 could improve to Low Positive. Under Alternative 1, the narrow retained strip would be too small and too exposed to edge effects to be restored and managed in the same way.

Offset

Even under Alternative 2, after avoidance, minimisation and rehabilitation, a residual impact of Medium Negative significance remains. This is because approximately 8.15 ha of Critically Endangered Agulhas Limestone Fynbos within a CBA1, and part of the *Mimetes saxatilis* population, will be permanently lost. This impact cannot be reduced further on site. The botanical specialist identifies the loss of Critically Endangered vegetation within a CBA1, and of *M. saxatilis* habitat, as red flags. However, these are not regarded as fatal flaws for Alternative 2, provided that the recommended mitigation measures and conditions are implemented.

A residual Medium Negative impact on a Critically Endangered ecosystem is the level at which a biodiversity offset must be considered. The development will result in the loss of approximately 8.15 ha of a critically endangered vegetation type to accommodate the development. In accordance with the National Biodiversity Offset Guideline (2023), an offset ratio of 30:1 is asserted for the loss of vegetation within a Critically Endangered ecosystem. Applying this ratio to the approximately 8.15 ha of indigenous vegetation proposed to be cleared on Erf 3495, results in an offset requirement of approximately 244.5 ha of the same vegetation type. Only 3.96 ha are available on site and therefore areas off site must be considered. The applicant owns the adjacent Remainder Farm 281 (~448 ha). As a result, a draft broader landscape conservation management master plan has been drafted. The conservation areas of the Paapekuilsfontein Conservation Master Plan (a draft concept option, to be further refined with input from SANParks and Cape Nature), includes future flagged development area and approximately 327 ha of natural areas for a broader landscape-scale offset area. The botanical specialist supports the proposed Conservation Master Plan with conditionally that the conservation areas are legally secured and actively managed before, or at the same time as, the loss of habitat on Erf 3495. The faunal specialists regard the Master Plan as additional

landscape-scale mitigation that would address the cumulative fragmentation of the lowland fynbos landscape as a whole. The Conservation Master Plan has been proposed to allow for long term corridor linkages. Its strategic location alongside the Agulhas National Park, as well as Erf 1032 – A Private Nature Reserve, has the opportunity to formalise these linkages in perpetuity.

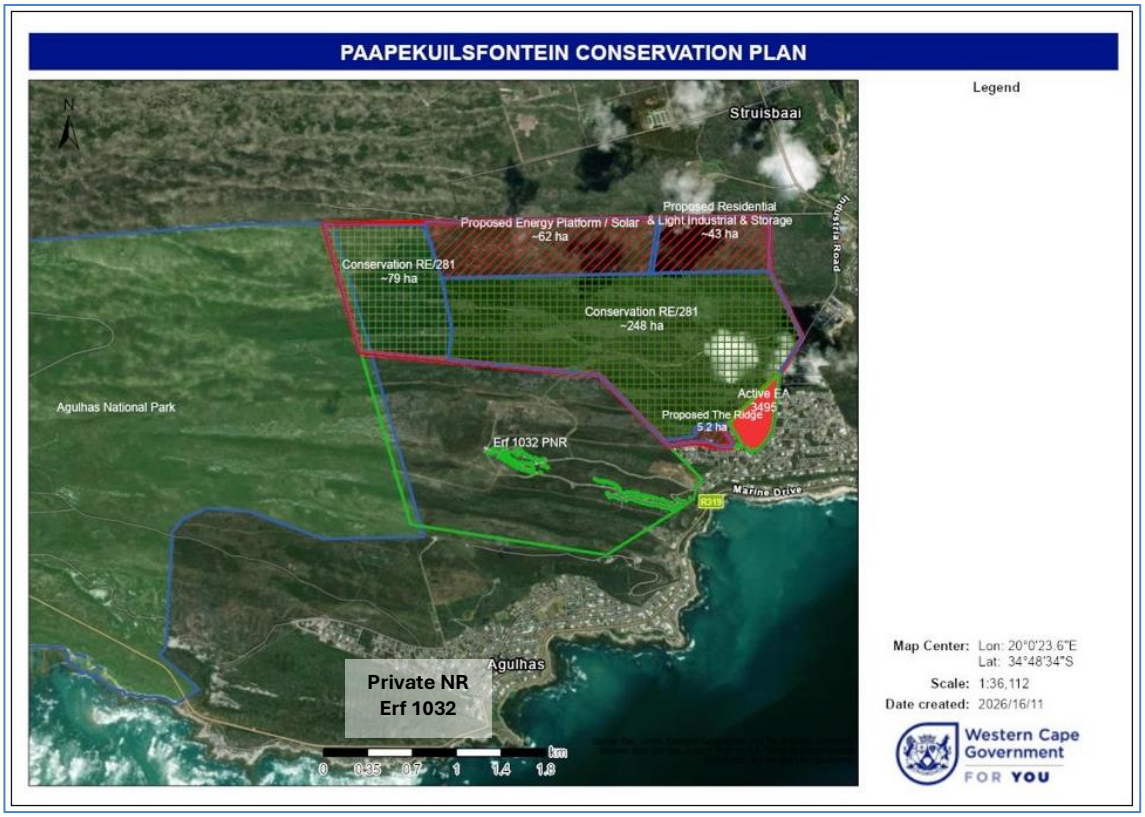


Figure 21: Paapekuilsfontein Conservation Master Plan.

Comparison of the alternatives and the best practicable environmental option

The No-Go alternative would avoid the direct loss of habitat on Erf 3495. However, it is not an active conservation scenario. Without a responsible management party, alien invasion, woodcutting and the exclusion of fire would continue to degrade the fynbos on the property, an impact that the specialists' rate as Low to Medium Negative. The high fuel load next to existing homes would remain a fire risk to the community. The residential use planned for the property in the Spatial Development Framework would also be forgone, which may increase pressure for development outside the urban edge.

Alternative 1 would provide thirteen more erven than Alternative 2. However, it would result in High Negative residual impacts on biodiversity and a high adverse visual impact. It would retain only an isolated and fragmented strip of natural habitat that could not function as part of the wider conservation landscape, and it is not supported by the specialists.

Alternative 2 is supported by all the specialists who assessed the layout alternatives, for the following reasons:

- it avoids the most sensitive and most visible part of the site;
- it retains 3.96 ha as a single conservation area connected to RE/281;
- it reduces the residual botanical and faunal impacts from High Negative to Medium Negative;
- it reduces the visual impact to low - moderate;
- it introduces active, long-term management of the retained habitat;

- it is linked to the securing of approximately 327 ha of the same vegetation type at landscape scale.

The heritage, palaeontological and traffic impacts are similar for both layout alternatives and can be managed to acceptable levels.

Conclusion

Based on the comparative assessment of the alternatives and the findings of the specialist studies, it is the opinion of the EAP that Alternative 2 represents the Best Practicable Environmental Option (BPEO), subject to the implementation of the recommended mitigation measures and the securing of an acceptable biodiversity offset mechanism.

Alternative 2 demonstrates the most effective application of the mitigation hierarchy by avoiding the most sensitive northern portion of the property, minimising impacts within the reduced development footprint, providing for the rehabilitation and long-term management of retained and disturbed areas, and identifying a landscape-scale conservation mechanism to address the residual biodiversity impacts.

Although Alternative 2 will still result in the permanent loss of approximately 8.15 ha of Critically Endangered Agulhas Limestone Fynbos within a CBA1, its residual impacts are substantially lower than those associated with Alternative 1. The preferred layout also retains a consolidated 3.96 ha Nature Conservation Area connected to the adjoining natural habitat on RE/281, thereby maintaining an opportunity for ecological connectivity and long-term conservation management.

The BPEO determination is therefore conditional upon the effective implementation of the Environmental Management Programme and Architectural Guidelines, as well as the legal securing and active management of the conservation areas identified in the Struisbaai Conservation Master Plan, or the provision of a separate biodiversity offset should the proposed landscape-scale mechanism not satisfy the applicable requirements.

SECTION J: GENERAL

1. Environmental Impact Statement

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

The key findings of the Basic Assessment for the proposed residential development on Erf 3495, Struisbaai, are summarised below. This is the Pre-Application Basic Assessment Report, made available for comment during the first round of the public participation process (PPP1), and the findings may be revised in response to the comments received.

Site and planning context

- Erf 3495 (12.22 ha) is located on the south-western edge of Struisbaai, in the Cape Agulhas Municipality. 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 site is a low limestone ridge rising from approximately 30 m above mean sea level in the north to approximately 65 m in the south.

- The property lies within the Struisbaai Urban Edge and is identified for future residential development in the Cape Agulhas Spatial Development Framework (2022–2027). It is zoned Agricultural Zone 1, has never been developed or farmed, and is crossed by two 10 m servitudes containing the municipal reservoir supply watermains.

- The Agricultural Compliance Statement verified the agricultural sensitivity of the site as Low, compared with the Medium rating of the Screening Tool.

The proposed development and alternatives

- The preferred layout (Alternative 2) comprises 72 single residential erven, private streets, private open space and the 3.96 ha Erf 80 Nature Conservation Area, with a development footprint of approximately 8.15 ha (67% of the property). Access will be taken from Adelle Street.

- No activity alternatives were proposed, as the proposal relates specifically to residential development on land identified for future residential development. Two layout alternatives were assessed, namely Alternative 1 and Alternative 2 (Preferred). The No-Go alternative was assessed as the baseline.

Botanical and terrestrial biodiversity

- The entire property supports Agulhas Limestone Fynbos, which is listed as Critically Endangered, and almost the entire property is mapped as a Critical Biodiversity Area 1 (CBA1) in the Western Cape Biodiversity Spatial Plan. The vegetation is in fair to good condition and is disturbed mainly by tracks, invasive *Acacia* species and woodcutting.

- The Screening Tool ratings of Very High terrestrial biodiversity sensitivity and High plant species sensitivity were verified in the field.

- Eight plant species of conservation concern and limestone endemics were recorded, including *Mimetes saxatilis* (Endangered), which occurs within the development footprint of both layout alternatives and cannot be transplanted. The size of its population on the property is not known.

- The botanical specialist identifies the loss of Critically Endangered vegetation within a CBA1, and the loss of *M. saxatilis* habitat, as red flags. These are not regarded as fatal flaws for Alternative 2, provided that the recommended mitigation measures and conditions are implemented.

Terrestrial fauna

- The faunal specialists rate the overall Site Ecological Importance of the faunal habitats and ecological processes as High, with particular importance for the Black Harrier, Southern Adder, Scarce Mountain Copper butterfly and landscape connectivity. The Angulate Tortoise, Cape Grysbok and Cape Golden Mole were recorded on the property.

- The presence of the Scarce Mountain Copper could not be confirmed, and a survey between January and March is recommended.

- From a faunal perspective, the security perimeter should enclose the residential component only, leaving Erf 80 connected to the adjoining natural habitat on RE/281.

Comparison of the layout alternatives

- Alternative 1 would clear approximately 10.16 ha (83%) of the property and would reduce Erf 80 to a narrow band of approximately 2.06 ha enclosed by erven. It results in High Negative residual botanical and faunal impacts and a high adverse visual impact and is not supported by the specialists.

- Alternative 2 avoids the steep and highly visible northern slope and retains 3.96 ha (32.7%) as a single block contiguous with RE/281. It reduces the residual impacts on Critically Endangered vegetation, the CBA1, *M. saxatilis* and fauna to Medium Negative, and it is supported by all the specialists who assessed the layout alternatives.

- Under the No-Go alternative, there would be no direct loss of habitat, but the fynbos would continue to be degraded by alien invasion, woodcutting and the exclusion of fire in the absence of a responsible management party (Low to Medium Negative), and the existing fire risk to the adjoining homes would remain.

Residual impact, biodiversity offset and cumulative impact

- The residual Medium Negative impact of Alternative 2 on a Critically Endangered ecosystem and a CBA1 is the level at which a biodiversity offset must be considered, and it cannot be reduced further on site.

- The botanical specialist considers that the conservation areas of the Paapekuilsfontein Conservation Master Plan (approximately 327 ha on RE/281, about 40 times the development footprint) can fulfil this function, provided that they are legally secured, managed, tied to the authorisation of Erf 3495, and shown to be adequate for the combined impacts of all the developments in the Master Plan. If they are not secured, a separate biodiversity offset would be required. The adequacy of this mechanism rests with the competent authority, informed by Cape Nature and SANParks.

- The cumulative impact of Alternative 2 on Agulhas Limestone Fynbos at Struisbaai is rated Medium Negative without secured conservation areas, and Low Negative if the Master Plan conservation areas are formally secured and managed.

- Once the area and offset proposal is accepted, the site can be verified for Stewardship and Nature Reserve Status and level.

Heritage and palaeontology

- The Heritage Impact Assessment found no graves, structures or sites of historical or social significance on the site. The heritage resources that may be affected are the natural and cultural landscape and potential palaeontological resources. The HIA recommends that Heritage Western Cape support the development, subject to the finalisation of the Architectural Guidelines and Landscape Master Plan and the completion of the visual simulations.

- Fossil bones may be exposed in the Waenhuiskrans Formation during excavation. With the implementation of the Fossil Finds Procedure, fossils can be rescued for scientific study, and the palaeontological impact can become positive.

Visual

- The development will be highly visible from the adjoining streets, where a natural outlook will be replaced by a residential edge, and the northern row of houses will form a new skyline when seen from the lower ground to the north.

- With mitigation, the visual impact of Alternative 2 is rated low adverse during construction and low to moderate negative during operation. This is subject to the verification of the double-storey zones on the northern and southern edges through visual simulations from Viewpoints 1, 2, 6 and 7 (with simulations from Viewpoints 1 to 12 to be developed), and to a further round of visual assessment once the Architectural Guidelines and 3D simulations have been developed.

Traffic and services

- The Transport Impact Assessment found that the transport impact is low and that no road upgrades are required. The site access off Adelle Street will operate at an acceptable level of service.

- The Cape Agulhas Municipality confirmed on 3 October 2025 that municipal water and sewer services are available. Stormwater will be attenuated on site, and refuse will be collected by the Municipality. The Municipality also confirmed the availability of electricity, subject to the network upgrades described in the electrical services report (Appendix G8).

Overall finding

The development of Erf 3495 will result in the permanent loss of approximately 8.15 ha of Critically Endangered Agulhas Limestone Fynbos within a Critical Biodiversity Area 1 (CBA1), and this residual impact is acknowledged. The botanical and faunal specialist assessments identify this loss of vegetation and habitat as the most significant impact of the proposed development. The associated loss of individuals and habitat of plant Species of Conservation Concern within the development footprint is equally significant. This includes part of the local subpopulation of *Mimetes saxatilis* (Endangered), which lies at the eastern limit of its range and cannot be transplanted. These impacts arise from the transformation of natural habitat required to establish the residential development, and they are permanent and irreversible.

The remaining impacts identified by the specialists are of lower significance and can be adequately managed through the mitigation measures set out in the EMPr. On the agricultural, palaeontological, traffic and visual aspects, the specialists rate the impacts of the preferred layout as being of Low to Medium significance after mitigation. The agricultural specialist verified the site as being of Low agricultural sensitivity.

The site is located within the demarcated urban edge of Struisbaai and is identified for future residential use in the Cape Agulhas Municipality Spatial Development Framework (2022–2027). It is bounded by existing residential development to the east and south, and the proposed development would form a contained extension of the existing town. The SDF, however, also recognises the CBA1 status of the site. The suitability of the site for residential development therefore depends on the residual biodiversity impacts being effectively addressed.

Alternative 2 is the preferred layout. It avoids the steep northern slope, which is the most visually exposed part of the site, and retains it as the 3.96 ha Erf 80 Nature Conservation Area. Erf 80 is a single block that remains connected to the natural habitat on the Remainder of Farm Paapekuilsfontein No. 281 (RE/281) and Agulhas National Park. Compared with Alternative 1, Alternative 2 reduces the development footprint by approximately 2.0 ha. It also reduces the residual biodiversity impacts from High Negative under Alternative 1 to Medium Negative.

The botanical, faunal, visual and heritage specialists support Alternative 2 and do not support Alternative 1. Their support is subject to the implementation of their recommended mitigation measures. The botanical specialist further requires that the residual impacts be addressed through the securing of the conservation areas proposed in the Paapekuilsfontein Conservation Master Plan. The faunal specialists regard the Master Plan as additional landscape-scale mitigation and leave the need for any further conservation mechanism to the competent authority.

In accordance with the National Biodiversity Offset Guideline (2023), the residual impact requires an offset of approximately 244.5 ha of equivalent Agulhas Limestone Fynbos. The Paapekuilsfontein Conservation Master Plan proposes approximately 327 ha of contiguous conservation area on RE/281, which is owned by the applicant. These areas are to be secured in perpetuity as a Nature Reserve through the Cape Nature Biodiversity Stewardship Programme (Level 3), and they exceed the offset requirement. They adjoin Erf 3495, Erf 80, Agulhas National Park and the Private Nature Reserve on Erf 1032. Securing them would therefore protect the ecological corridor between the urban edge of Struisbaai and the protected area network, which is the principal function of the CBA1 in this area. The botanical specialist concludes that, provided this conservation areas are secured, the cumulative impact on Agulhas Limestone Fynbos would be reduced from Medium Negative to Low Negative.

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)

Refer to **Appendix D.**

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.

No activity alternatives were proposed, as the proposal relates specifically to the residential development of Erf 3495, which lies within the Struisbaai Urban Edge and is identified for future residential development in the Cape Agulhas Spatial Development Framework (2022–2027). The alternatives assessed are two layout alternatives for the proposed residential development, namely Alternative 1 (84 single residential erven), which is not preferred, and Alternative 2 (72 single residential erven), which is the preferred alternative. The No-Go alternative was assessed as the baseline against which the layout alternatives were compared. The positive and negative impacts and risks of each alternative are summarised separately below.

Alternative 1 (Non-Preferred)

Positive impacts

- The development would provide 84 serviced residential erven, thirteen more than Alternative 2, on land within the Struisbaai Urban Edge that is identified for residential use.

- The employment, rates and service revenue benefits would be marginally greater than those of Alternative 2 because of the additional erven (Medium Positive, EAP assessment).

- Invasive *Acacia* species and the woodcutters' debris would be cleared from the property, reducing the fire risk to the adjoining homes. However, the retained habitat to which the benefits of long-term management would apply is approximately half that of Alternative 2.

- Fossil bones exposed during excavation could be rescued for scientific study under the Fossil Finds Procedure.

Negative impacts and risks

- Approximately 10.16 ha (83%) of Critically Endangered Agulhas Limestone Fynbos within a CBA1 would be permanently lost, including the steep northern slope. The botanical specialist rates the residual impact as High Negative and considers on-site mitigation inadequate.

- A substantial part of the *Mimetes saxatilis* subpopulation on Erf 3495, together with other species of conservation concern and limestone endemics, would be lost (High Negative).

- Erf 80 would be reduced to a narrow band of approximately 2.06 ha (16.9%) enclosed by erven on both sides, isolated from RE/281 and exposed to edge effects. The botanical specialist considers it unlikely to remain functional, and the exclusion of fire would be inevitable (Medium Negative after mitigation).

- The faunal specialists rate the residual impacts of Alternative 1 as High Negative, owing to the greater habitat loss and the isolation of the retained habitat.

- Houses on the steep northern slope, the most visible part of the site, would halve the conservation area and form a new built edge towards Santie Street, resulting in a high adverse visual impact during operation.

- These impacts would be similar to, but proportionately greater than, those of Alternative 2 because of the additional erven, and earthworks and retaining on the northern slope could not be screened.

- Fossils could be damaged or destroyed during excavation if they are not recognised and reported, over a larger excavation area than Alternative 2.

Alternative 1 is not supported by the botanical, faunal or visual specialists and is not the preferred alternative.

Alternative 2 (Preferred)

Positive impacts

- The development will provide 72 serviced residential erven on land within the Struisbaai Urban Edge that is identified for residential use, directing residential growth away from the natural land surrounding the town.

- The development will create short-term employment during the construction of the civil services and individual dwellings, and long-term employment in estate management, maintenance, landscaping, alien clearing, security and domestic services, together with increased rates and service revenue for the Cape Agulhas Municipality.

- The northern 3.96 ha (32.7%) of the property will be retained as the Erf 80 Nature Conservation Area, a single block of Agulhas Limestone Fynbos contiguous with the natural habitat on RE/281, which will be legally protected and actively managed.

- Invasive *Acacia* species will be cleared from the whole property and the cut material removed. The botanical specialist notes that sustained clearing and management under an ecologically appropriate fire regime could result in a Low Positive outcome within Erf 80.

- The removal of the existing high fuel load of senescent fynbos, invasive *Acacia* and woodcutters' debris, together with a fire management plan and firebreaks on the developed edge, will reduce the risk of an uncontrolled fire spreading to the existing homes along Adelle Street and Noreen Street.

- Under the Fossil Finds Procedure, fossil bones exposed in the Waenhuiskrans Formation during excavation can be rescued for scientific study, which the palaeontological specialist rates as a Medium to High Positive outcome.

- If the conservation areas of the Paapekuilsfontein Conservation Master Plan (approximately 327 ha of Agulhas Limestone Fynbos on RE/281) are legally secured and managed, they would protect the natural landscape between Struisbaai and Agulhas National Park, which underpins the sense of place and tourism value of the area. With these areas secured, the cumulative impact of Alternative 2 would be reduced to Low Negative.

Negative impacts

- Approximately 8.15 ha (67%) of Critically Endangered Agulhas Limestone Fynbos within a CBA1 will be permanently lost. The botanical specialist identifies this as a red flag, but not a fatal flaw for Alternative 2 (Medium Negative residual impact).

- Part of the population of *Mimetes saxatilis* (Endangered), which cannot be transplanted, and of other species of conservation concern and limestone endemics will be lost within the footprint.

- Faunal habitat will be lost within the footprint, and edge effects from lighting, traffic, people, domestic animals and fencing will affect the retained habitat, with an increased risk of mortality of species such as the Southern Adder, tortoises and ground-nesting birds.

- Without effective long-term management, Erf 80 could be degraded by trampling, dumping, garden escapes, the Argentine ant and the exclusion of fire.

- A natural limestone ridge will be transformed into a residential area, and the adjoining residents will lose part of their natural outlook.

- Adjoining residents will be exposed to noise, dust, construction traffic and temporary lighting, intermittently over several years as individual dwellings are built.

- The development will generate approximately 71 vehicle trips in each weekday peak hour. The surrounding intersections will continue to operate at acceptable levels of service, and no road upgrades are required.

- The development will place additional demand on water, sewer, stormwater and solid waste services. The Cape Agulhas Municipality has confirmed the availability of water and sewer services.

- Fossils could be damaged or destroyed during excavation if they are not recognised and reported.

No-Go alternative

Positive impacts

- There would be no direct loss of Critically Endangered vegetation, CBA1 habitat or *Mimetes saxatilis* on Erf 3495.

- The existing natural outlook of the adjoining residents would be retained, and there would be no construction nuisance or additional traffic.

Negative impacts

- In the absence of a responsible management party, alien invasion, informal woodcutting and the exclusion of fire would continue to degrade the fynbos and faunal habitat on the property. The botanical specialist rates the impact of the spread of alien invasive plants under the No-Go alternative as Medium Negative, and its overall impacts as Low to Medium Negative.

- The high fuel load of senescent fynbos, invasive *Acacia* and woodcutters' debris adjacent to existing homes would remain, and the fire risk to the adjoining community would continue.

- The residential development planned for the property in the Spatial Development Framework, and the associated employment and municipal revenue, would be forgone. This may increase pressure for development on natural land outside the urban edge.

- The opportunity to secure and manage Erf 80 and the conservation areas of the Struisbaai Conservation Master Plan through the development would be lost.

Conclusion

In conclusion, Alternative 2 retains the positive impacts of the proposed residential development while avoiding the most sensitive and most visible part of the site and reducing the residual biodiversity impacts from High Negative to Medium Negative. It is therefore the preferred layout alternative and is supported by all the specialists who assessed the layout alternatives.

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

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

Based on the findings of the assessment and the specialist studies, the EAP recommends that the impact management outcomes set out below be included in the Environmental Management Programme (EMPr). These outcomes describe the environmental results that must be achieved and maintained during the pre-construction, construction and operational phases of the development, and against which compliance will be monitored and audited by the Environmental Control Officer (ECO).

It is further the recommendation of the EAP that all the mitigation measures recommended by the specialists, as written in their reports, must be implemented and included in the EMPr. These measures are contained in the following specialist reports:

→ Botanical and Terrestrial Biodiversity Impact Assessment (**Appendix G2**)
→ Terrestrial Animal Site Sensitivity Verification and Species Specialist Assessment (**Appendix G3**)
→ Visual Impact Assessment (**Appendix G6**)
→ Heritage Impact Assessment (**Appendix G4**)
→ Palaeontological Impact Assessment (**Appendix G5**)
→ Transport Impact Assessment (**Appendix G7**)
→ Civil Engineering Services Report (**Appendix G9**)
→ Architectural Guidelines (**Appendix G10**)

The impact management outcomes are presented below according to the phases of the development in which they apply. The impact management actions, responsibilities, timeframes and monitoring requirements required to achieve each outcome are set out in the EMPr.

Pre-construction and construction phase

Clearance of indigenous vegetation

Clearing of indigenous vegetation is restricted to the approved development footprint of Alternative 2 (approximately 8.15 ha) and, during the construction of each dwelling, to the demarcated construction area of that erf. No clearing, storage of materials, vehicle access or construction activity takes place within the Nature Conservation Area (Erf 80), the private open space or the municipal pipeline servitudes.

Plants Species of Conservation Concern

The densest stands of the Endangered *Mimetes saxatilis* are identified before the layout is finalised and are retained where feasible. Plants that can be transplanted, seed of the Protea family and topsoil are recovered from the development footprint before clearing and are reused in rehabilitation and landscaping.

Animal Species on the site

Animals present on the site are protected from harm during clearing, excavation and construction. No avoidable deaths of animals occur, including the Southern Adder, Angulate Tortoise and Cape Golden Mole, and no active bird nests are destroyed.

Scarce Mountain Copper butterfly

Whether the Endangered Scarce Mountain Copper butterfly occurs on the site is confirmed through a survey between January and March, before vegetation clearing begins, and any habitat on which it depends is protected.

Fossils and archaeological material

Any fossils or archaeological material uncovered during excavation are reported, protected and collected in accordance with the Fossil Finds Procedure and the requirements of Heritage Western Cape, so that they are recorded and preserved rather than lost.

Soil erosion and stormwater

Soil erosion is prevented, and no sediment or polluted stormwater leaves the construction area or enters Erf 80 or neighbouring properties. Areas disturbed during construction are rehabilitated as soon as they are no longer required.

Municipal bulk water pipelines

The municipal bulk water pipelines within the two 10 m servitudes that cross the site are not damaged and remain accessible to the Cape Agulhas Municipality at all times.

Construction waste

All construction waste is contained, removed from the site and disposed of at a licensed facility. No waste, rubble or hazardous substances are dumped on the site or within Erf 80.

Neighbouring residents and public roads

Noise, dust and construction traffic are managed so that neighbouring residents on Adelle Street and Noreen Street are not unduly disturbed or placed at risk, and public roads are not damaged.

Post-Construction Phase

Nature Conservation Area (Erf 80)

Erf 80 (3.96 ha) is retained permanently as natural Agulhas Limestone Fynbos, a Critically Endangered vegetation type, and is legally protected. No gardens, buildings, services or paths are allowed to encroach into it.

Connection to surrounding natural land

Erf 80 remains connected to the adjoining natural land on the Remainder of Farm Paapekuilsfontein No. 281, so that animals can move freely between the two areas. Wildlife passages in the security fence remain open and safe for animals.

Invasive alien plants

Erf 80 and the open spaces are kept free of invasive alien plants. Invasive or prohibited plants are not planted in gardens or open spaces, and any that spread from gardens are removed before they become established.

Fire management

Erf 80 is managed with ecologically appropriate fire in accordance with an approved fire management plan. Firebreaks are placed on the edge of the development rather than within Erf 80, and the fire risk to existing and new homes is reduced.

Effects of residential activities on Erf 80

Outdoor lighting, pets, pesticides, rodent poisons, invasive ants and vehicle traffic from the development do not harm the plants and animals in Erf 80.

Appearance of the development in line with the Architectural Guidelines

Buildings, colours, materials, lighting and landscaping comply with the approved Architectural Guidelines, so that the development appears as a low-scale extension of Struisbaai and does not break the skyline when seen from the surrounding area.

Water and energy use

The use of municipal drinking water is reduced through rainwater harvesting and water-saving fittings, and all dwellings meet the national energy efficiency standard for buildings (SANS 10400-XA).

Long-term management of Erf 80

A responsible body, being the Home Owners' Association or another appointed management entity, actively manages and monitors Erf 80 for the life of the development, in co-ordination with the management of the adjoining conservation land.

Landscape scale

Remaining loss of Critically Endangered vegetation

The permanent loss of approximately 8.15 ha of Critically Endangered Agulhas Limestone Fynbos, which cannot be avoided on the site, is compensated for by legally securing and managing the conservation areas (approximately 327 ha) identified in the Struisbaai Conservation Master Plan or, if this cannot be achieved, through a separate biodiversity offset approved by the competent authority.

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.

The findings of the assessment, and the significance ratings assigned to the impacts of the preferred layout (Alternative 2), are conditional on the implementation of the measures set out below. These measures were either recommended by the specialists in their reports or identified by the EAP in the course of the assessment. If any of these measures were not implemented, the residual impacts would be higher than those assessed, and the conclusions of this report would no longer apply. The EAP therefore recommends that each of the following aspects be included as a condition of the Environmental Authorisation.

Conditions of Authorisation

General Conditions

→ The approved EMPr, including all the mitigation measures recommended in the specialist reports, must be implemented for the duration of the construction and operational phases. The EMPr must form part of all contract documents and must be given effect to in the constitution of the Home Owners' Association (HOA)
→ An independent Environmental Control Officer (ECO) must be appointed before construction commences. The ECO must monitor compliance with the EMPr during the construction of the civil services and of each individual dwelling, keep a record of all fauna encountered, relocated or killed and of any unauthorised disturbance of Erf 80, and submit environmental audit reports to the Department at the frequency specified in the EMPr.
→ All construction personnel must receive an environmental induction before commencing work. The induction must cover the sensitivity of Agulhas Limestone Fynbos, the status of Erf 80 as a no-go area, the procedure to be followed when fauna are encountered, the prohibition on killing snakes and other fauna, and the Fossil Finds Procedure.

Pre-construction conditions

→ Before the layout is finalised, a spring census of *Mimetes saxatilis* and other proteoid species of conservation concern must be undertaken by a suitably qualified botanist on the development footprint and within Erf 80.
→ Before any vegetation clearing commences, a survey for the Scarce Mountain Copper butterfly (*Trimenia malagrida maryae*) must be undertaken by a suitably qualified specialist during the adult flight period between January and March.
→ Before any building plans are approved, visual simulations from Viewpoints 1 to 12 must be prepared to verify the northern and southern double-storey zones. Where a double-storey house would break the skyline when seen from Viewpoints 6 and 7 or would loom over the existing houses when seen from Viewpoints 1 and 2, the erf concerned must be restricted to a single storey or the upper floor must be set back from the slope edge. The revised Architectural Guidelines and Landscape Master Plan must be submitted to the visual specialist for a further round of assessment and to Heritage Western Cape. The Architectural Guidelines must be updated to include Erf 79 in the southern double-storey zone.
→ The final Architectural Guidelines must be given effect to through the HOA constitution and the title conditions, and a Design Review Committee must be established to review all house plans, additions and alterations against the Guidelines. The Guidelines must retain the single-storey restriction and the 1.0 m platform limit on the ridge-line erven, must require dark grey or charcoal matt roofs and warm off-white, stone or timber walls, and must prohibit brilliant white and reflective finishes.
→ The broader Paapekuilsfontein Conservation Master Plan should be implemented as a landscape-scale component of the mitigation associated with Erf 3495.

→ Conservation areas and ecological corridors identified through the broader framework should be clearly delineated and incorporated into appropriate long-term land-management arrangements.

→ Before construction commences, the Master Landscape Plan must be developed into a detailed Landscape Plan by a Registered Professional Landscape Architect in consultation with the botanical specialist. The Landscape Plan must use locally indigenous species suited to the exposed coastal conditions of the Agulhas plain, must remove the non-indigenous, riverine and forest species currently proposed, must limit lawn, must provide a planted buffer of naturally occurring species along the edges facing the existing houses on Noreen Street and Adelle Street, and must include a list of prohibited invasive garden plants for incorporation into the HOA constitution.

→ Before construction commences, an alien invasive clearing programme must be implemented across the whole of Erf 3495, with all cut material removed from the site, and systematic follow-up clearing must be undertaken in Erf 80 for the life of the development. A fire management plan must be prepared in consultation with the local fire protection association and CapeNature, with firebreaks placed on the developed edge and not within Erf 80.

Construction-phase conditions

→ The construction footprint must be demarcated before any vegetation is cleared. Clearing must be confined to the authorised Alternative 2 footprint and, during house construction, to the construction zone of each erf. Erf 80 and the private open space must be fenced off and treated as no-go areas, and no construction camps, vehicles, lay-down areas, stockpiles, spoil, concrete mixing or waste storage may be placed within them.

→ Before clearing commences, a search and rescue of geophytes, succulents and other transplantable species within the authorised footprint must be undertaken by a suitably qualified person, and seed of *M. saxatilis* and other Proteaceae must be collected for propagation by a specialist nursery. Topsoil must be stripped and reused on road verges and open space.

→ A faunal inspection, including a check for active bird nests, must be undertaken by a faunal specialist or a suitably briefed ECO immediately before clearing commences within each portion of the footprint.

→ The Fossil Finds Procedure must be implemented during all excavations. Where fossil or archaeological material is uncovered, work at that spot must stop and the find must be reported to the ECO, who must notify Heritage Western Cape and the standby palaeontologist. Significant finds must be collected by a professional palaeontologist under a permit issued by Heritage Western Cape, at the expense of the developer, and must be deposited at a SAHRA- or HWC-approved institution.

Operational-phase conditions

→ The security perimeter must enclose only the residential component and its associated private infrastructure, leaving Erf 80 connected to the adjoining natural habitat on RE/281. The fence on the interface between the residential component and Erf 80 must be fauna-permeable and visually open, and no solid walls may be erected on this interface. Fauna passages must be kept functional for the life of the development and, where the fence is electrified, must be designed so that they do not create a mortality risk. Buildings on erven bordering Erf 80 must observe a 3.0 m building line.

→ No services, structures, private gardens, storage areas, informal tracks or recreational facilities may be placed within Erf 80, and no rocks, vegetation or other natural material may be removed from it.

→ All external and street lighting must be low-level, shielded, downward-directed and warm-spectrum.

→ The HOA constitution must prohibit free-ranging dogs within Erf 80, must prohibit or tightly control free-roaming cats, and must include measures to limit the spread of the Argentine ant, including the inspection of imported soil, plants and building material. Broad-spectrum pesticides may not be applied within Erf 80, and second-generation anticoagulant rodenticides may not be used within the estate.

→ Responsibility for the long-term management of Erf 80 must be assigned to the HOA or another designated land-management entity. Management must address alien vegetation, fire, access control, fauna passages, erosion,

domestic animals and waste, must be coordinated with conservation management on RE/281, and must be monitored and adapted where impacts prove greater than anticipated

Landscape-scale conservation

→ Before, or at the same time as, the loss of habitat on Erf 3495, the conservation areas of the Struisbaai Conservation Master Plan (approximately 327 ha on the Remainder of Farm Paapekuilsfontein No. 281) must be:

- legally secured in perpetuity, 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;
- managed in terms of a management plan with a responsible management authority and secured funding;
- shown explicitly on the final Master Plan, together with their extent, ecological corridors and feeder areas, and verified in the field in the appropriate season; and
- demonstrated to be adequate for the combined residual impacts of all the developments in the Master Plan.

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.

It is the reasoned opinion of the EAP that the proposed Bella Vista residential development on Erf 3495, Struisbaai, as presented in the preferred layout (Alternative 2), should be authorised, subject to the conditions set out below and the implementation of the EMPr. This opinion is based on the considerations set out below.

The property lies within the Struisbaai Urban Edge and is identified for future residential development in the Cape Agulhas Spatial Development Framework (2022–2027). The Cape Agulhas Municipality has confirmed the availability of water and sewer services, and the development can be served by existing municipal infrastructure in its immediate vicinity. Developing this property directs residential growth to land identified for that purpose and away from the natural land surrounding the town. Alternative 2 is the outcome of applying the mitigation hierarchy to the initial layout. It avoids the steep and highly visible northern slope, reduces the development footprint from approximately 10.16 ha (83.1%) to approximately 8.15 ha (67%), and retains 3.96 ha (32.7%) as the Erf 80 Nature Conservation Area, contiguous with the natural habitat on RE/281. On this basis, the residual impacts on Critically Endangered Agulhas Limestone Fynbos, the CBA1, *Mimetes saxatilis* and terrestrial fauna are reduced from High Negative under Alternative 1 to Medium Negative, and the visual impact is reduced to low to moderate.

Alternative 2 is supported by all the specialists who assessed the layout alternatives. The botanical specialist identifies the loss of Critically Endangered vegetation within a CBA1, and of *M. saxatilis* habitat, as red flags, but does not regard them as fatal flaws for Alternative 2, provided that the recommended mitigation measures and conditions are implemented. The faunal specialists conclude that Alternative 2 can be considered, subject to the strict implementation of the mitigation measures and the broader conservation framework. The heritage, palaeontological, visual and traffic impacts can be managed to acceptable levels with the recommended mitigation, and the palaeontological impact may become positive if fossils are rescued.

The residual Medium Negative impact on a Critically Endangered ecosystem and CBA1 is acknowledged, and it cannot be reduced further on site. This impact can be addressed at landscape scale through the conservation areas of the Paapekuilsfontein Conservation Master Plan, which would secure approximately 327 ha of the same vegetation type which will be connected with the Agulhas National Park.

The No-Go alternative on the other hand would avoid the direct loss of habitat, but in the absence of a responsible management party, alien invasion, woodcutting and the exclusion of fire would continue to degrade the fynbos on the property, and the existing fire risk to the adjoining community would remain. Alternative 2 introduces active, long-term management of the retained habitat and reduces this fire risk.

The authorisation should therefore be conditional on the securing of the Master Plan conservation areas, or a separate biodiversity offset, to the satisfaction of the competent authority, informed by CapeNature and SANParks.

Conditions of Authorisation

General Conditions

→ The approved EMPr, including all the mitigation measures recommended in the specialist reports, must be implemented for the duration of the construction and operational phases. The EMPr must form part of all contract documents and must be given effect to in the constitution of the Home Owners' Association (HOA)
→ An independent Environmental Control Officer (ECO) must be appointed before construction commences. The ECO must monitor compliance with the EMPr during the construction of the civil services and of each individual dwelling, keep a record of all fauna encountered, relocated or killed and of any unauthorised disturbance of Erf 80, and submit environmental audit reports to the Department at the frequency specified in the EMPr.
→ All construction personnel must receive an environmental induction before commencing work. The induction must cover the sensitivity of Agulhas Limestone Fynbos, the status of Erf 80 as a no-go area, the procedure to be followed when fauna are encountered, the prohibition on killing snakes and other fauna, and the Fossil Finds Procedure.

Pre-construction conditions

→ Before the layout is finalised, a spring census of *Mimetes saxatilis* and other proteoid species of conservation concern must be undertaken by a suitably qualified botanist on the development footprint and within Erf 80.
→ Before any vegetation clearing commences, a survey for the Scarce Mountain Copper butterfly (*Trimenia malagrida maryae*) must be undertaken by a suitably qualified specialist during the adult flight period between January and March.
→ Before any building plans are approved, visual simulations from Viewpoints 1 to 12 must be prepared to verify the northern and southern double-storey zones. Where a double-storey house would break the skyline when seen from Viewpoints 6 and 7 or would loom over the existing houses when seen from Viewpoints 1 and 2, the erf concerned must be restricted to a single storey or the upper floor must be set back from the slope edge. The revised Architectural Guidelines and Landscape Master Plan must be submitted to the visual specialist for a further round of assessment and to Heritage Western Cape. The Architectural Guidelines must be updated to include Erf 79 in the southern double-storey zone.
→ The final Architectural Guidelines must be given effect to through the HOA constitution and the title conditions, and a Design Review Committee must be established to review all house plans, additions and alterations against the Guidelines. The Guidelines must retain the single-storey restriction and the 1.0 m platform limit on the ridge-line erven, must require dark grey or charcoal matt roofs and warm off-white, stone or timber walls, and must prohibit brilliant white and reflective finishes.
→ The broader Paapekuilsfontein Conservation Master Plan should be implemented as a landscape-scale component of the mitigation associated with Erf 3495.
→ Conservation areas and ecological corridors identified through the broader framework should be clearly delineated and incorporated into appropriate long-term land-management arrangements.
→ Before construction commences, the Master Landscape Plan must be developed into a detailed Landscape Plan by a Registered Professional Landscape Architect in consultation with the botanical specialist. The Landscape Plan must use locally indigenous species suited to the exposed coastal conditions of the Agulhas plain, must remove the non-indigenous, riverine and forest species currently proposed, must limit lawn, must provide a planted buffer of naturally occurring species along the edges facing the existing houses on Noreen Street and Adelle Street, and must include a list of prohibited invasive garden plants for incorporation into the HOA constitution.
→ Before construction commences, an alien invasive clearing programme must be implemented across the whole of Erf 3495, with all cut material removed from the site, and systematic follow-up clearing must be undertaken

in Erf 80 for the life of the development. A fire management plan must be prepared in consultation with the local fire protection association and CapeNature, with firebreaks placed on the developed edge and not within Erf 80.

Construction-phase conditions

→ The construction footprint must be demarcated before any vegetation is cleared. Clearing must be confined to the authorised Alternative 2 footprint and, during house construction, to the construction zone of each erf. Erf 80 and the private open space must be fenced off and treated as no-go areas, and no construction camps, vehicles, lay-down areas, stockpiles, spoil, concrete mixing or waste storage may be placed within them.
→ Before clearing commences, a search and rescue of geophytes, succulents and other transplantable species within the authorised footprint must be undertaken by a suitably qualified person, and seed of *M. saxatilis* and other Proteaceae must be collected for propagation by a specialist nursery. Topsoil must be stripped and reused on road verges and open space.
→ A faunal inspection, including a check for active bird nests, must be undertaken by a faunal specialist or a suitably briefed ECO immediately before clearing commences within each portion of the footprint.
→ The Fossil Finds Procedure must be implemented during all excavations. Where fossil or archaeological material is uncovered, work at that spot must stop and the find must be reported to the ECO, who must notify Heritage Western Cape and the standby palaeontologist. Significant finds must be collected by a professional palaeontologist under a permit issued by Heritage Western Cape, at the expense of the developer, and must be deposited at a SAHRA- or HWC-approved institution.

Operational-phase conditions

→ The security perimeter must enclose only the residential component and its associated private infrastructure, leaving Erf 80 connected to the adjoining natural habitat on RE/281. The fence on the interface between the residential component and Erf 80 must be fauna-permeable and visually open, and no solid walls may be erected on this interface. Fauna passages must be kept functional for the life of the development and, where the fence is electrified, must be designed so that they do not create a mortality risk. Buildings on erven bordering Erf 80 must observe a 3.0 m building line.
→ No services, structures, private gardens, storage areas, informal tracks or recreational facilities may be placed within Erf 80, and no rocks, vegetation or other natural material may be removed from it.
→ All external and street lighting must be low-level, shielded, downward-directed and warm-spectrum.
→ The HOA constitution must prohibit free-ranging dogs within Erf 80, must prohibit or tightly control free-roaming cats, and must include measures to limit the spread of the Argentine ant, including the inspection of imported soil, plants and building material. Broad-spectrum pesticides may not be applied within Erf 80, and second-generation anticoagulant rodenticides may not be used within the estate.
→ Responsibility for the long-term management of Erf 80 must be assigned to the HOA or another designated land-management entity. Management must address alien vegetation, fire, access control, fauna passages, erosion, domestic animals and waste, must be coordinated with conservation management on RE/281, and must be monitored and adapted where impacts prove greater than anticipated

Landscape-scale conservation

→ Before, or at the same time as, the loss of habitat on Erf 3495, the conservation areas of the Paapekuilsfontein Conservation Master Plan (approximately 327 ha on the Remainder of Farm Paapekuilsfontein No. 281) must be:
    - legally secured in perpetuity, 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;
    - managed in terms of a management plan with a responsible management authority and secured funding;

- shown explicitly on the final Master Plan, together with their extent, ecological corridors and feeder areas, and verified in the field in the appropriate season; and
- demonstrated to be adequate for the combined residual impacts of all the developments in the Master Plan.

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

The assessment is based on the information available at the time of writing, including the specialist reports, Site Development Plan, the Architectural Guidelines, the Struisbaai Master Landscape Plan and the Civil Engineering Services Report. The assumptions, uncertainties and gaps in knowledge that relate to the assessment, and the proposed mitigation measures are described below, together with the manner in which each will be addressed. Where an investigation is still outstanding, it has been included as a condition of the recommended Environmental Authorisation, so that it must be completed before the layout is finalised or before construction commences.

Status of this report and the public participation process

- This is the Pre-Application Basic Assessment Report which is being made available for comment during the first round of the public participation process (PPP1). The information, findings and recommendations contained in it may be subject to change in response to the comments received from interested and affected parties (I&APs), State Departments and Organs of State during the public participation process.
- All comments received during the PPP1 comment period will be recorded, considered and responded to in the Comments and Responses Report, which will be included in **Appendix F**. Where comments raise new information or valid concerns, the assessment, the layout, the specialist reports, the impact management outcomes and the EMPr will be revised accordingly, and the revised report will be made available to registered I&APs for comment during the second round of the public participation process (PPP2) before it is submitted to the competent authority for decision.
- The comments of the State Departments and Organs of State, including CapeNature, SANParks, the Department of Agriculture, the Overberg District Municipality and the Cape Agulhas Municipality, are awaited. The assessment may need to be revised in response to these comments.

Heritage Impact Assessment and its annexures

- The Heritage Impact Assessment, attached as Appendix G4, has been prepared as an integrated heritage assessment in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), under HWC Case No. HWC23083108MS0904. It draws together the specialist studies that inform the heritage assessment and includes them as annexures, namely the Palaeontological Impact Assessment, the Botanical and Terrestrial Biodiversity Impact Assessment and the Visual Impact Assessment, together with the development proposal.
- These annexures are the same specialist reports that have been assessed in this Basic Assessment Report, and they are already attached as appendices to this report, namely the Botanical and Terrestrial Biodiversity Impact Assessment (**Appendix G2**), the Palaeontological Impact Assessment (**Appendix G5**) and the Visual Impact Assessment (**Appendix G6**). They are not separate or additional studies, and the findings and recommendations of the HIA are therefore consistent with those presented in this report.
- The draft HIA is being made available for comment at the same time as this report, including to the registered heritage conservation bodies (the Agulhas Heritage Society and Conservation Body and Whale Coast Conservation), the Cape Agulhas Municipality and the I&APs identified through the NEMA process. The comments received on the draft HIA will be included in full in **Annexure H** of the HIA, considered for incorporation into its findings and recommendations, and submitted together with the final HIA to Heritage Western Cape for Final Comment. The Final Comment of Heritage Western Cape will be included in the Final BAR submitted to the competent authority.
- The HIA assumes that the information and assessments supplied by others are accurate and a fair representation of the proposed development. It notes that the significance of a heritage resource is

dynamic and may change over time as societal values change, and it does not address heritage impacts beyond the site boundaries that may arise from pipelines or other infrastructure outside the property.

General

- It is assumed that the information provided by the applicant, the design team and the specialists is accurate and complete, and that the development will be implemented as described in this report.

Botanical and terrestrial biodiversity

- The size of the *Mimetes saxatilis* population on Erf 3495 is not known, as an accurate estimate would require a detailed grid search. The botanical specialist therefore applied the precautionary principle, assuming that the population within the development footprint is of local importance, and recommends a spring census before the layout is finalised.
- The botanical surveys (December 2022, November 2023 and October 2026) covered the main flowering period of Agulhas Limestone Fynbos, but autumn- and winter-flowering geophytes may not have been recorded.
- The Struisbaai Conservation Master Plan is a conceptual working plan that has not yet been approved by the provincial nature conservation authorities. Its conservation areas have not yet been legally secured, and their boundaries, corridors and management arrangements have not been finalised. The acceptance of the Master Plan as a substitute for a biodiversity offset therefore depends on conditions that have not yet been met.

Terrestrial fauna

- The faunal site visit was undertaken in August 2025. Species that are cryptic, seasonal or active at other times of the year may not have been detected, and the assessment therefore relies in part on habitat suitability, published distribution data and desktop records.
- The presence of the Scarce Mountain Copper butterfly could not be confirmed, as the adults are active only between January and March. The species is therefore assumed to be potentially present until a survey has been undertaken during this period.

Palaeontology

- The distribution of fossil material in the Waenhuiskrans Formation beneath the site cannot be predicted, and the dense vegetation cover prevents a meaningful field survey before construction. The palaeontological assessment therefore relies on the monitoring of excavations by briefed earthworks personnel and the ECO under the Fossil Finds Procedure, with a palaeontologist on standby. These measures are already incorporated into the EMPr.

Visual

- The Visual Impact Assessment is a draft. The visual simulations from Viewpoints 1 to 12 have not yet been completed, and the effect of the proposed double-storey zones on the northern and southern edges is still to be verified. The VIA (18 November 2026) recommends a further round of assessment once the Architectural Guidelines and Landscape Master Plan have been developed further and 3D simulations prepared, and notes that the draft Architectural Guidelines (Rev 02) must be updated to include Erf 79 in the southern double storey zone.

Conclusion on assumptions, uncertainties and gaps

Notwithstanding the assumptions, uncertainties and gaps described above, the EAP is of the opinion that the information contained in this report is sufficient to send out the report for public comment. The outstanding

investigations are not expected to change the identification of the preferred layout or the significance of the principal impacts; should they do so, the assessment will be revised before submission. They have been made conditions of the recommended authorisation so that their outcomes will inform the final layout and design before construction commences.

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 on site 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 construction with one final construction audit at conclusion of construction.

3. Water

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

Struisbaai lies within the winter-rainfall region of the Western Cape, with a mean annual precipitation of approximately 532 mm that falls mainly between May and August. The Civil Engineering Services Report (attached as **Appendix G9)** notes that the Western Cape has previously experienced water shortages and that these may recur, and it requires that water saving and harvesting measures be investigated and implemented for the proposed development.

The Cape Agulhas Municipality confirmed in a letter dated 3 October 2025 (**Appendix J**) that municipal water services are available for the development. The development will be supplied from the existing 160 mm diameter municipal watermain along the western road reserve of Adelle Street, through a bulk water meter installed for the Municipality's metering purposes. No connections will be permitted to the two-reservoir supply watermains that cross the site. The Annual Average Daily Demand of the 72 residential erven has been calculated at 0.7396 ℓ/s (approximately 64 kℓ per day), based on 900 ℓ per unit per day. No water demand has been allocated to the private streets, the private open space or the Erf 80 Nature Conservation Area, none of which will be irrigated from the municipal supply. Although the Municipality can supply this demand, the Civil Engineering Services Report states that it is the intention of the development to develop alternative water resources, including rainwater harvesting and water saving devices, so that the demand on the municipal supply is reduced.

Measures during the construction phase

- Construction water will be obtained only through a metered connection approved by the Cape Agulhas Municipality, and the meter readings will be recorded by the Environmental Control Officer (ECO) so that consumption can be monitored.

- Dust suppression will be limited to areas where dust is generated and to windy conditions. Stockpiles of sand and topsoil will be covered or kept low, and clearing will proceed progressively rather than exposing the whole footprint at once, which will reduce the volume of water required for dust control.

- Water used for mixing concrete and cleaning equipment will be contained in designated areas, and wash-water will be settled and reused for further mixing or dust suppression where practicable rather than discharged. Concrete wash-water may not be discharged onto natural ground or into Erf 80.

- Hoses will be fitted with trigger-operated nozzles, taps will be closed when not in use, and leaks in temporary water connections will be repaired immediately.

- Vehicles and plant will not be washed on site using potable water.

- Rehabilitation and landscaping will use locally indigenous Agulhas Limestone Fynbos species and plants rescued from the footprint, which require little or no irrigation once established, so that temporary irrigation can be limited to the establishment period.

Measures during the operational phase to reduce demand and save water

Rainwater harvesting

In terms of the Architectural Guidelines, every dwelling must install a rainwater tank with a capacity of at least 5 000 ℓ, fed from the roof, for garden irrigation and toilet flushing. As the rainfall at Struisbaai falls mainly in winter, the tanks will store winter rainfall for use in the drier summer months, when the demand for garden irrigation is highest.

Water-saving fittings

All dwellings must be fitted with water-wise fittings, including low-flow shower heads, aerators or flow restrictors on taps, and dual-flush toilets (Architectural Guidelines).

Water-wise landscaping

Landscaping of the streets, open space and gardens must use locally indigenous species (McDonald, 2026), and the plant palette of the Master Landscape Plan is to be revised to remove riverine and forest species and to limit lawn. Lawn is limited to a maximum of 30% of the garden area, and irrigation systems must be automatic, fitted with a rain sensor and supplied from the rainwater tank where possible (Architectural Guidelines). Locally indigenous fynbos is adapted to the low rainfall and calcareous soils of the site and requires little, or no irrigation once established.

No irrigation of natural areas

Erf 80 (3.96 ha) will be retained as natural Agulhas Limestone Fynbos and will not be irrigated, and the private open space and pipeline servitude corridors will be planted with locally indigenous, low-maintenance species.

Metering and monitoring

The bulk water meter required by the Municipality will enable the total consumption of the development to be monitored, so that leaks in the internal reticulation can be detected and repaired promptly by the Home Owners' Association (HOA).

Compliance with municipal water restrictions

The HOA constitution will require residents to comply with any water restrictions imposed by the Cape Agulhas Municipality, including restrictions on garden irrigation and the filling of swimming pools.

Measures to reuse or recycle water

Rainwater reuse

The roof rainwater stored in the tanks on each erf will be reused for toilet flushing and garden irrigation, replacing potable water for these uses.

Greywater reuse

The Architectural Guidelines encourage the installation of greywater systems, which allow water from baths, showers and hand basins to be reused for garden irrigation in accordance with the requirements of the Cape Agulhas Municipality.

Stormwater and groundwater recharge

Stormwater from the development will be attenuated on site to pre-development flows and passed through a dissipation, silt and debris trap before discharge to the municipal system at Adelle Street and Karen Close. Attenuating the runoff allows a portion of it to infiltrate into the ground, which, as stated in the Civil Engineering Services Report, allows the existing groundwater system to be recharged.

Through these measures, the use of potable water for non-potable purposes, principally toilet flushing and garden irrigation, will be substantially reduced, and the development's demand on the municipal water supply will be lower than the design demand calculated in the Civil Engineering Services Report.

4. Waste

Explain what measures have been taken to reduce, reuse or recycle waste.

The principal waste streams associated with the development are cleared vegetation and topsoil, excavated material, general construction waste and, during the operational phase, household and garden refuse. The Civil Engineering Services Report confirms that refuse from the development will be collected, managed and disposed of by the Cape Agulhas Municipality. The following measures will be implemented to reduce, reuse or recycle waste.

Construction phase

Topsoil

Topsoil from the development footprint will be stripped, stockpiled separately from subsoil and reused on road verges and open space, to retain the soil seed bank.

Indigenous plants

Geophytes, succulents and other transplantable species will be rescued from the footprint before clearing and reused in landscaping or relocated to Erf 80 or the adjoining natural land on RE/281, and seed of *Mimetes saxatilis* and other Proteaceae will be collected for propagation.

Cut alien vegetation

Cut alien material from the clearing of *Acacia* and other invasive species must be removed from the site and may not be left in situ, as it suppresses the fynbos and increases the fire risk.

Excavated material

Excavated soil and rock should be reused on site for backfilling and landscaping where it is suitable. No rocks may be removed from Erf 80 for landscaping, retaining walls or gardens.

Separation of construction waste

Construction waste will be stored in labelled, scavenger-proof receptacles for general waste, recyclable materials and hazardous waste. Recyclable materials should be separated for recycling where a recycling service is available,

and the remaining waste must be removed to a licensed disposal facility, with disposal certificates kept for inspection by the ECO.

Prohibitions

No spoil, rubble, household waste, garden waste or construction material may be deposited within Erf 80, and waste may not be burned or buried on site. Concrete wash-water, fuels, oils and other pollutants may not be discharged onto natural soil or vegetation (Venter & Swart, 2026).

Operational phase

- Household refuse will be collected by the Cape Agulhas Municipality. In terms of the Architectural Guidelines, refuse bins must be stored behind walls forming part of each house.
- Garden refuse, soil, lawn clippings and other landscaping material may not be dumped within Erf 80. The Architectural Guidelines permit only organic fertilisers and composts, and residents should be encouraged to compost garden refuse on their own erven where practicable.
- Food waste should be stored securely to avoid attracting scavenging animals.
- The HOA constitution should provide for the separation of recyclable household waste, in line with the waste collection services provided by the Cape Agulhas Municipality.

5. Energy Efficiency

5.1.	Explain what design measures have been taken to ensure that the development proposal will be energy efficient.

The Civil Engineering Services Report states that the electrical requirements of the development are being evaluated by Converge Consulting under separate cover. The energy efficiency of the development will be secured mainly through the design requirements of the Architectural Guidelines, which will apply to every dwelling and will be enforced through the Design Review Committee. The relevant design measures are as follows:

Building regulations

Glazing must comply with SANS 10400-N (glazing) and SANS 10400-XA (energy usage in buildings) of the National Building Regulations.

Solar energy

Solar photovoltaic (PV) panels are encouraged and must be laid flat on the roof at the same pitch, with black or dark grey frames. Solar water heaters must be split systems, with the storage tank concealed, as roof-mounted tanks are not permitted where they are visible.

Lighting

External lighting must use energy-efficient LED fittings with warm white light of 3 000 K or less, limited to low-level, shielded, downward-facing fittings. The visual and faunal specialists further recommend that street lighting be limited to low-level bollards, that motion-activated lighting be used where continuous lighting is not needed, and that external lighting be limited to what is required for safety and security.

Passive design

The Architectural Guidelines describe houses made up of simple, narrow, pitched-roof forms linked by lighter, lower elements such as verandahs, lean-tos and pergolas, which provide shading to the main living spaces. North

orientation of well-used rooms, roof and wall insulation, suitable roof overhangs and natural ventilation are encouraged, and planted flat roofs are encouraged where flat roofs are used.

Air-conditioning

Where air-conditioning units are installed, they must be placed at ground level behind a screen wall.

The extent of the energy savings will depend on the final house designs and on the uptake of the measures that are encouraged rather than required, and it has not been quantified.

SECTION K: DECLARATIONS

DECLARATION OF THE APPLICANT

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

I, MICHAEL A. HULBACH ID number 6508255219087 in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

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

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

Signature of the Applicant: Date: 05.11.2026

HELENIKA NUMBER 1 (PTY) LTD.

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;



16 Nov 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 ……, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or

  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);

- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;

- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and

- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

Signature of the EAP: Date:

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):