Eco Route
ENVIRONMENTAL CONSULTANCY
REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN
PhD Univ. Pretoria
Cell:072 222 6013
e-mail: ebersohn@cyberperk.co.za

MS. JANET EBERSOHN
Bsc. Hons.Environmental Management
Cell: 082 557 7122
Tel: 044 343 2232
e-mail:janet@ecoroute.co.za

NEED AND DESIRABILITY

The Proposed Residential Development on Portion 91 of Farm Matjes Fontein 304, Keurboomstrand, Plettenberg Bay, Western Cape Province.

This section considers the Guidelines for Involving Social Impact Assessment Specialists in the EIA process that was prepared for the Department of Environmental Affairs and Development Planning for the Western Cape Province of South Africa in February 2007. The key components, which are embodied in these guidelines include:

- Describe and obtain a basic understanding of the proposed development (type, scale and location). Also obtain an understanding of the individuals and/or communities which are likely to be affected by the intervention and determine the need and the scope of conducting an SIA. It was determined that the need for a socio-economic impact assessment is not required, and has been sufficiently addressed in this report.
- Collecting the baseline data for the proposed intervention based on the current social environment and historical social trends. The Lightstone report is attached to provide social trends for the Keurbooms area (Appendix G13).
- Assess and document the significance of the social impacts, which are associated with the proposed intervention. The impacts have been assessed in the Impact Assessment (Appendix J) and in Section 6 of this report.
- Based on the baseline data and the identification and assessment of the social impacts likely to be associated with the proposed intervention, identify alternatives and mitigation measures for the social impacts of the proposed intervention. Mitigations and alternatives are recommended in the Visual Impact Assessment, and Impact Assessment (Appendix J).

The vision of this development is to create an affordable and sustainable housing product that is safe, compact, efficient and modern. The aim is to create a pleasant yet affordable residential neighbourhood where the average person can own a home and live with dignity. The architecture will be based on green principles which will include smaller but well-designed houses, which are more cost-efficient, energy-efficient and healthy.

The development concept includes 60 group housing stands with average erf sizes of ±500m². The houses will vary in size but will be built in a similar style that will create a harmonious development. Ample open spaces and landscaped streets are incorporated into the design to enhance the quality of the neighbourhood.

The 60 residential erven are approximately 29 471m² in total, with the internal road network of approximately 12 013m² making a total permanent disturbance footprint of 41,484m². The communal open space II area within the development will be approximately 9 642m² of landscaped gardens and stormwater infiltration ponds systems.

The proposed open space system is made up of 9 642m^2 within the development footprint and 83 512m^2 of the remaining area. The open space areas within the development will be zoned as Open Space II and correspond to the position of indigenous vegetation, forest, and milkwood trees. The remaining undeveloped 83 512m^2 will be zoned as Open Space III and will be managed as a conservation area in accordance with a Conservation Management Plan. The conservation area also incorporates an ecological corridor for wildlife movement and the historical fountain. The ecological corridor will run between the west and east boundary of the property along the foot of the slope and creates a buffer zone of 20 meters between the development and the forest area. In addition to the wildlife benefitting from this 20 m corridor, the slope base is also then protected in terms of groundwater recharge

Figure 1: Preferred Layout of the proposed development.

1. THE NEED FOR AFFORDABLE HOUSING

The first question that needs to be asked when any development is considered is whether there is a need for the contemplated land use. This is normally a question that the potential investor would answer before he embarks on a long and expensive application process. Development, like any other business, is about supply and demand.

The Garden Route is becoming increasingly popular among people who want to seek a quieter lifestyle and move out of the cities. According to the Bitou Local Municipality Growth Projections and Land Use Budget, the actual population growth in Bitou LM for the period 2001 –2016 has been about 1999 people per annum and this growth rate has dramatically increased in the last 2 years. Statistics show that historically most people moving to the Bitou area are from the Eastern Cape. Most of these people are poor, low-skilled individuals who are searching for employment opportunities. Although most of the population growth and subsequent housing needs are in the poorer communities, there is also a known need for middle-income properties in Plettenberg Bay.

There is currently a "semigration" trend, with many people from Gauteng and KwaZulu/Natal moving to smaller towns in the Western Cape. It seems that Covid-19 has caused a lot of people to introspect and re-

evaluate their priorities, which has led to the current influx of affluent city dwellers to the Garden Route. Recent unrest and increased crime and violence in Gauteng and Natal will be likely to create an even higher demand for housing in safer areas. This leads to a situation where demand, and therefore property prices, are well above national averages even though affordability is relatively low.

The Plettenberg Bay area historically has very little housing opportunities. The mentioned influx of higher-income families moving to the area has led to a sharp increase in housing prices which has further exacerbated the lack of affordable housing. Many residents are displaced as property values rise to the point of unaffordability. This displacement of the middle class and lack of affordable houses has a tremendous effect on the economy of the town, as the middle-class workforce actively contributing to these economies can no longer afford to live here.[1]

According to the report by Helen Melon Properties (2021) Between 2014 and 2020, nearly 50% of property sales handled by Helen Melon Properties were to Gauteng buyers, followed by 26.6% local buyers from Plettenberg Bay and 11.8% from elsewhere in the Western Cape. Traditionally a market for holiday and retirement homes, the area has seen a shift toward permanent relocations driven by remote working and a preference for coastal living. This is especially evident among younger families leaving Gauteng, reflecting the broader semigration trend to the Western Cape's Garden Route.

Helen Melon Properties also indicated that Post-Covid recovery has been strong[2]:

- 60% increase in property sales valued between R4 million and R5 million.
- 68.75% of all sales occurred in gated estates and farms, showing demand for secure, lifestyle-focused properties.
- Sales in the R3 million to R4 million range declined by 37.87%, possibly due to bracket creep as lower-priced stock diminished.

There is a growing demand for housing in the Western Cape, driven by economic and demographic shifts across the province. Over the past decade, the Western Cape has experienced significant in-migration from other provinces, as well as steady population growth in key urban centres such as Cape Town, George, and Plettenberg Bay. This has placed increasing pressure on the housing market, with demand far outstripping supply – particularly for homes that cater to households earning too much to qualify for government-subsidised housing, but too little to afford high-end or luxury properties.

The "missing middle" is most acutely affected by this shortage. These are teachers, nurses, municipal workers, skilled tradespeople, and other professionals essential to the province's economy. Rising property prices and land values in coastal and peri-urban areas have steadily pushed this earning bracket out of traditional residential nodes. As prices climb, these families face the prospect of long commutes from distant, more affordable areas, contributing to congestion, increased transport costs, and reduced quality of life. The developer's intention is to offer houses and properties at an approximate price range of R2 500 000 to R3,000,000. While this may still be beyond the means of many, it does present an opportunity for certain families to attain homeownership. Currently, there are no houses available in this price range, as confirmed by a brief search on Property 24.

This shortage has wider economic and social implications. Without sufficient housing, towns and cities risk losing a stable workforce critical for sustaining public services, tourism, and local business. Well-planned housing developments, particularly those that incorporate sustainable design, appropriate densities, and access to amenities, are essential to bridging this housing gap. They provide an opportunity to stabilise property markets, create inclusive communities, and ensure that the Western Cape retains the very people who form the backbone of its public and private sector workforce.

[1] Planning Report, 2024. Planning Space Town and Regional Planners.
[2] Plettenberg Bay: Proof that Gautengers prefer Plett

In an article by Property24 (13 June 2023), Dr. Golding explained the following regarding the growing demand for more spacious properties following the Covid pandemic – *"While estate living was initially seen as the preserve of the wealthy, they are becoming increasingly accessible to a broader cross-section of home buyers as developers realise the potential of including sectional title and retirement homes in developments – thereby broadening the appeal of this convenient way of living."*

Chris van der Merwe, Broker/Manager of RE/MAX Coastal, also explained that there is an extreme demand for real estate along the Garden Route, from vacant land to high-end luxury homes. "*Across all price ranges, we are experiencing a shortage of real estate. The demand outstrips the supply, which in time will, no doubt, affect prices*" [3].

Further in the article by Property24 (13 June 2023), Sandra Gordon says (research analyst for Pam Golding Properties) *"Given the growing preference for the security and convenience of living in an estate, this trend is likely to continue during the year ahead – particularly as estates become more energy and water efficient – thereby widening their appeal - and as the variety of homes available for sale become more diverse, again expanding their desirability and making estate homes more accessible to a wider audience."*

The Applicant seeks to address this growing need through the provision of safe compact efficient and modern housing in the form of estate living that is affordable to a broader range of homebuyers. This market segment is currently underserved and cannot realistically be achieved through eco-tourism or agricultural land uses, which do not deliver residential opportunities for this critical income bracket. Importantly, the financial structure of residential development in the Western Cape means that density directly affects affordability. Municipalities impose augmentation fees – sometimes referred to as development contributions – for water, sewer, and electricity services on every new stand created. These fees are necessary to upgrade bulk infrastructure but are charged per unit, not per hectare. In practical terms, this means that if fewer, larger stands were created (i.e. a lower-density layout), the total augmentation and servicing costs would be divided across fewer buyers, significantly raising the selling price of each property.

Lower density development would therefore defeat the purpose of this project, as the cost of each stand would escalate not only because of augmentation fees, but also because of the cost of providing bulk services (roads, stormwater, sewerage networks) over a larger land area to serve fewer buyers. Housing development requires a careful balance: enough density to achieve economies of scale and cost-sharing, without pushing density so high that it creates urban design or environmental challenges. The proposed layout achieves this balance by providing a density that keeps property values at in an affordable bracket, while still respecting the site's environmental sensitivities and open space requirements.

2. SOCIO-ECONOMIC NEED OF THE LARGER COMMUNITY

South Africa has an ever-increasing challenge of high unemployment and skills shortages. With the destructive impact of Covid 19 on the world economy this problem has worsened. At the end of 2018, the unemployment rate was reported to be 27,2%5. One of the main goals that South Africa has set itself in the National Development Plan, is to cut the unemployment rate to 6% by 2030.

The planned residential estate will create construction jobs for local contractors and labourers. The employment opportunities associated with the construction phase are frequently regarded as temporary employment. However, while these jobs may be classified as "temporary" it is worth noting that the people employed in the construction industry by its very nature rely on "temporary" jobs for their survival. In this regard "permanent" employment in the construction sector is linked to the ability of construction companies to secure a series of temporary projects over a period of time. Each development, such as the proposed development, therefore, contributes to creating "permanent" employment in the construction sector.

[3] Propert24 Article. Are estates the homes of our future? And the high demand for Garden Route real estate explained. 13 June 2023.

The construction industry is an important player in job creation, not only in the construction sector but in other sectors of the economy as well. The construction industry uses a wide range of inputs such as manufacturing of construction materials and equipment, mining of raw materials, forestry, transportation, real estate, finance, and professional services which all contribute indirectly to more jobs that are created across several sectors.

Plettenberg Bay has a very similar demographic profile to the rest of the country. Socio-economic studies indicate high levels of poverty and unemployment. The social needs of the larger community form part of the "surrounding environment" and should receive due consideration when new developments are investigated. The "ripple effect" that a development of this scale has on the local economy and social well-being of the community cannot be ignored.

The *Needs and Desirability* section also assesses the rationale and appeal of the proposed development based on its strategic location and contribution to municipal objectives.

From a **needs** perspective, the development is shown to align with the Bitou Local Municipality's Spatial Development Framework (SDF) and Integrated Development Plan (IDP). It supports key priorities such as community growth, job creation, and economic empowerment. The proposal also outlines potential positive contributions to biodiversity (conservation zoning, stewardship agreement, prompting connectivity through wildlife corridors, etc), and infrastructure capacity (augmentation contributions, onsite package plant, rainwater harvesting, etc), while offering opportunities to stimulate the local economy. Although not linked to a national strategic initiative, the development demonstrates clear local relevance and value.

The **desirability** focuses on the development's environmental implications, with specific emphasis on achieving the Best Practicable Environmental Option. It confirms consistency with municipal planning policies and highlights the potential for increased community income and employment. Evaluation of desirability stresses the importance of responsible land use, environmental stewardship, and the consideration of cumulative impacts.

The municipal growth projections and land use budget outlined in Annexure A of the Bitou Spatial Development Framework (BSDF) provide a clear indication of demand across various housing segments, including both high- and middle-income markets. According to the BSDF, the demand for high- and middle-income housing was estimated at approximately 2,800 units by 2025, with projections exceeding 8,000 units by 2040. The unreferenced figures cited by the Ratepayers Association are therefore not particularly relevant, as they fall well below the municipality's long-term demand projections. On a more practical level, the significant increase in property prices within the area indicates an undersupply in the market. To ensure alignment with market needs, the final building designs will be guided by comprehensive market research, allowing for an informed response to prevailing demand at the time of construction (Planning Space, Appendix F4).

Based on the objections received during the first round of public participation, it was evident that the local community was predominantly concerned about the perceived high density of the development and the potential demographic it might attract, and how this may impact on their own property values. In an effort to address the concerns of neighbouring residents, the development concept was revised by reducing the density from 73 to 60 units, and increasing property sizes from approximately 375m² to approximately 500m². As a result, the development's gross density now stands at approximately 4 units per hectare, while the net density is approximately 10 units per hectare. These adjusted figures align more closely with the surrounding neighbourhood densities. It will, however, result in higher property prices and not reaching the target market that was initially intended (Planning Space, Appendix F4).

3. PHYSICAL SITE CONSTRAINTS AND OPPORTUNITIES

The table below provides a summary of the physical site constraints and opportunities identified to date:

OPPORTUNITIES	CONSTRAINTS
Municipal Infrastructure: Bulk municipal services are available, and access is available through an existing road network. Municipal sewer and water lines are situated along this road, making a cost-efficient connection to this network possible.	There is 2 public road that traverses over the properties, taking away valuable development land. The capacity of the existing infrastructure needs to be further investigated.
Agricultural Value: The property has no agricultural value due to, its small size, and limited irrigation potential. For this reason, the property has not been identified for Agricultural purposes in the SDF.	
Low conservation value: The southern side of the property has a low conservation value due to historical agricultural practices.	The northern part of the property is covered with sensitive forest and cannot be developed.
Topography: The site has an even gradient which will allow for cost-effective services and design.	A large part of the property is too steep to develop. The low-lying nature of the land (below 5m MSL) results in the property being identified as part of the EFZ
	High visibility: The development area is situated adjacent to Keurboom Road. A Landscape Plan and an architectural design guideline will be a requirement to mitigate the potential visual impact.

It can be concluded that the site has limited constraints and that the unique site characteristics will be preserved within the planned development. The site characteristic described above makes this site highly desirable for development.

4. COMPATIBILITY WITH THE SURROUNDING AREA

The Keurboom village is a seasonal holiday town with a homogeneous single residential holiday character. The property is about 1.8 km west of the town along a stretch of road that contains several gated residential developments. The Zoning Plan (Figure 2) indicates that the study area mainly consists of Single residential and Group housing zoned residential estate of varying densities, other than Agricultural 1 zoning. The proposal is compatible with the existing land uses.

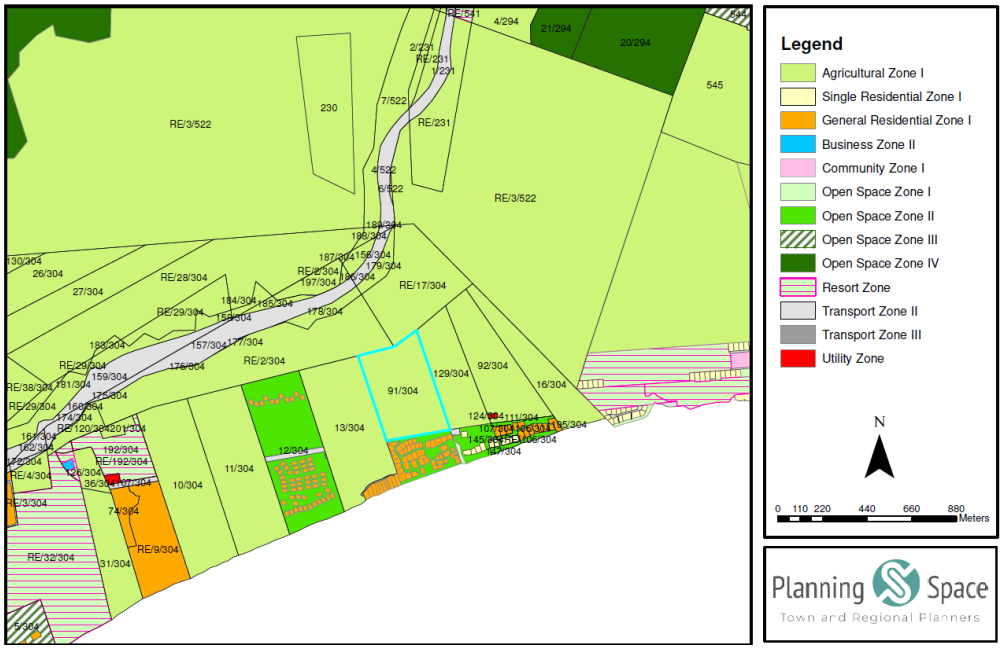


Figure 2: Zoning map of study site in the Keurboomstrand area.

Table 1: Development Densities in the Keurboomstrand area. Extracted from the Town Planning Report by Planning Space Town and Regional Planners, dated 11/01/2022 (Appendix G6).

DEVELOPMENT DENSITIES IN THE AREA					
Development Name	**Property description**	**Status**	**Nr of Units**	**Property size**	**Gross Density**
Candle wood	Pt 129, 92, 16 of 304	Lapsed but intention to reapply	50	37ha	1.3dupa
Whale Haven		Implemented	17	3.9ha	4.4du/ha
Driftwood	Ptn 15/304	Implemented	5	3ha	1.7du/ha
Ptn 91/304	Ptn 91/304	Lapsed but intention to reapply	60	14.7ha	4.1du/ha
Milkwood	Ptn 14/304	Implemented	50	6.5ha	7.7du/ha
Keurbaai	Ptn of ptn 13	Implemented	11	1.3ha	8.46du/ha
Dolphin Wave	Ptn 12/304	GP approved 2016, road constructed - lapsed?	62	10,3ha	6,2du/ha
Ptn 10/304	Ptn 10/304	Rights granted in 2018 for 32 units	32	22ha	1.45du/ha
The Dunes	Re9/304	Implemented	143	11.7ha	12.6du/ha
Dune Park	Ptn 74/304	Implemented	41	2.1ha	19.5du/ha
Natures Path	Ptn 10 and 192 / 304	EIA granted 2018	98	6.8ha	14.4du/ha
Plett Manor	Ptn 3/304	Implemented	130	9.7ha	13.4 du/ha
Nautilus estate	Erf 1169	2 implemented	6	9.7ha	0.6du/ha

According to the Lightstone Report (2025) attached as Appendix G13, Keurboomstrand is a high-income, predominantly LSM 10 (Living Standards Measure) suburb with strong property values, particularly in estate freeholds and non-estate freehold properties. Demand remains steady, with newer buyers and sellers showing a high level of activity in recent years. The area is well-serviced by key amenities and offers proximity to beaches, making it attractive for mature homeowners and retirees.

Below is a summary of the report findings from June 2024 to May 2025.

Property Composition

The suburb comprises the following property types:

- Sectional Title Units: 43.28%
- Freehold Properties in Estates: 40.07%
- Freehold Properties (non-estate): 16.65%
- Sectional Titles in Estates: 0%

This distribution reflects a balanced mix between estate living and sectional title options, catering to a range of homeowner preferences.

Demographic Profile

- Adult Population: 1,544
- Average Monthly Household Income: R85,000 – R105,000
- Predominant LSM (Living Standards Measure): LSM 10 Low

Ownership is concentrated among older adults, particularly pensioners and mature individuals aged 50–64. A notable portion of current owners (34%) have held their properties for over 11 years, indicating long-term stability.

Property Transactions and Values

- Sales Activity (June 2024 – May 2025):
- Total Transfers: 63
- Total Sales Value: R261,631,875
- Average Sales Price: R4,152,886

Sales by Price Band:

- R800,001 – R1,500,000: 8 transfers
- R1,500,001 – R3,000,000: 18 transfers
- Over R3,000,000: 5 transfers

Sales by Property Type:

- Estate Freeholds (21 transfers): Avg. R6,205,000
- Developed Sectional Titles (31 transfers): Avg. R2,286,129
- Freehold Land Only in Estates (6 transfers): Avg. R2,308,333
- Developed Freeholds (Non-Estate, 5 transfers): Avg. R9,321,375

There is strong market activity in both sectional title and freehold estate properties, with the highest values recorded in non-estate developed freeholds.

Ownership Trends

Ownership Duration:

- Less than 5 years: 34%
- More than 11 years: 34%

Recent Sellers: 50% sold within 5 years of ownership
Buyer Age Profile: Predominantly pensioners and mature adults

The ownership and transaction patterns indicate a healthy market with both long-term residents and ongoing turnover.

Valuation Rankings

Keurboomstrand ranks among the top suburbs nationally based on median property values:

- Freehold Ranking: 202nd out of 6,704 suburbs (Median: R5.6 million)
- Sectional Title Ranking: 207th out of 2,708 suburbs (Median: R2.45 million)
- Neighbouring high-value suburbs include Keurbooms Lagoon, with a median value of R10.43 million.

Amenities and Accessibility

Keurboomstrand is located within convenient proximity to essential services:

- Beaches: Keurboomstrand, Lookout Beach (within 5 km)
- Shopping: Market Square, Look Out Centre (4.7–5.5 km)
- Healthcare: Mediclinic Plettenberg Bay, local clinics (approx. 5.9 km)
- Education: Several primary and pre-primary schools within 6–7 km
- Police Services: 6–9 km to nearest SAPS stations

There are no bus stations in immediate proximity, indicating limited public transport access.

Lending Activity

Primary lending institutions active in the area include:

- ABSA
- FNB
- Nedbank
- Standard Bank (SBSA)
- Investec
- Discovery
- SA Home Loans

This indicates a diverse and healthy mortgage finance environment.

According to a recent Article in the Financial Mail[4], the average value for a property in Plettenberg Bay increased by 24% from 2020 to 2021 to R3million, a further 9% in 2022 to R3,3million and 26% to R4,2million in 2023. Entry level asking prices in Plettenberg Bay have increased considerably over the past 4 years. It is currently difficult to find full title homes below R3,500,000.

In the coming years it is critical that the housing shortage in the middle-income bracket be addressed to ensure the efficient functioning of the Plettenberg Bay economy. This development aims to address the growing need for housing (Planning Report, Appendix G6).

[4] This report was compiled by Steven Neufeld, Manager Principal of Lew Geffen Sotheby's International Realty Plettenberg Bay and Professional Valuer and Court Appointed Appraiser for South African Property Valuations®: 072 417 7731 (or) steven@sapv.co.za

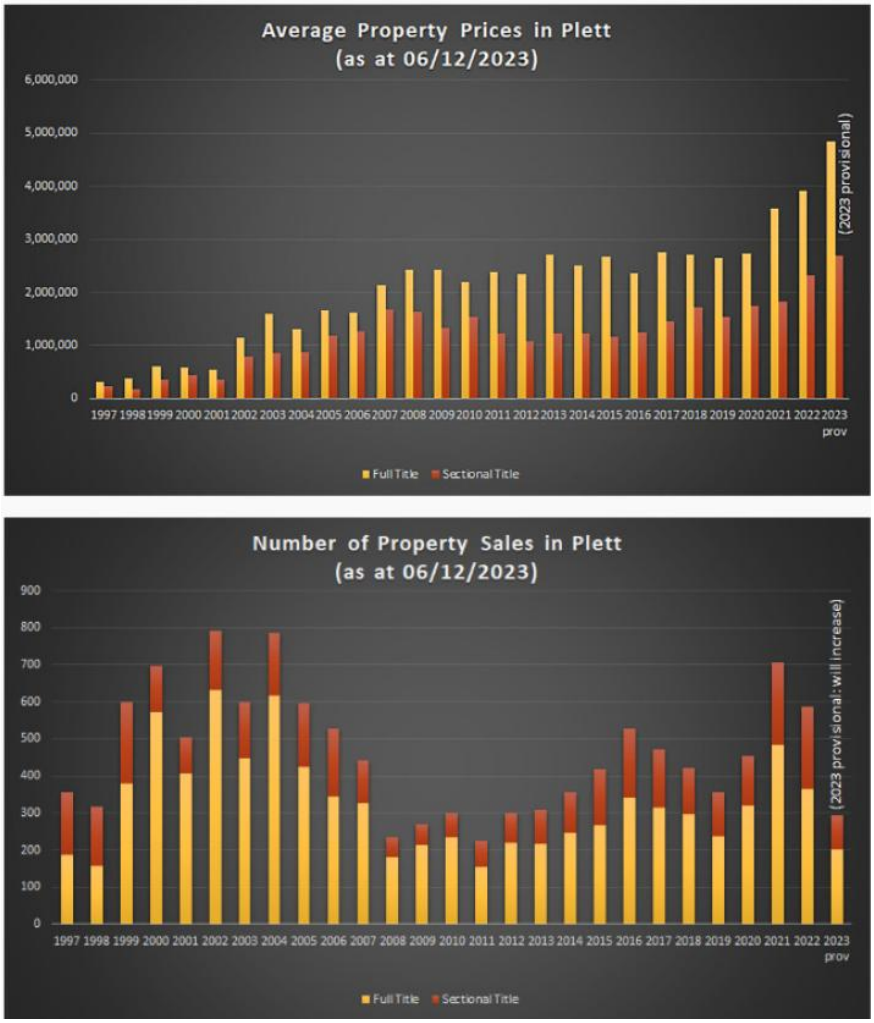


Figure 3: Property sales and prices between 1997and 2023.

Freehold properties in estates form a substantial portion of Keurboomstrands housing market and attract high-end buyers. Over 57% of the estate freehold sales were above R3 million, with an average transaction value of R6.2 million (Lightstone 2025). The proposed residential estate development allows opportunity for affordable freehold property relative to the area within an estate by providing properties in a price bracket of R2.5 million – R3 million.

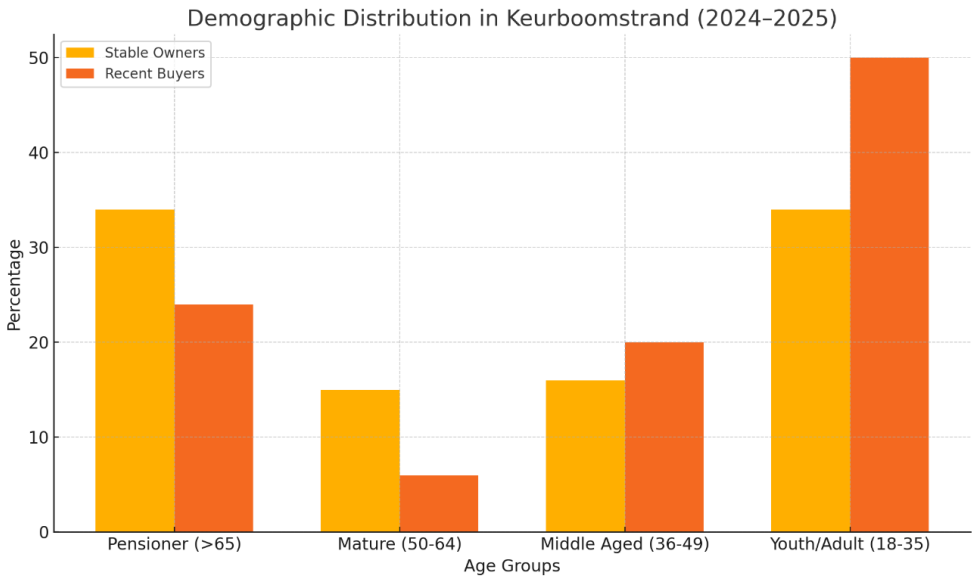


Figure 4: Visual representation of the demographic distribution in Keurboomstrand (2024–2025), showing the percentage of Stable Owners and Recent Buyers across different age groups.

5. KEURBOOMS & ENVIRONS LOCAL AREA SPATIAL PLAN 2013 (KELASP)

The KELASP achieves a sustainable and well-balanced plan in terms of the identification of future local economic development opportunities versus protecting/enhancing those qualities forming the area's sense of place (natural and built environment). The Municipality through its approval of the LASP officially adopts it as spatial planning policy, to guide future development and conservation in Keurbooms and environs.

The main objective of this LASP is to provide the Municipality with a policy at an appropriate Local Area scale that will on the one hand protect and enhance conservation worthy areas and on the other hand identify and define appropriate opportunities supporting local economic development (KELASP,). The policy will in the final instance be adopted by the Municipality as a LASP in terms of the Municipal Systems Act (Act No. 32 of 2000), as part of the broader Bitou Municipal Spatial Development Framework (SDF) and Integrated Development Plan (IDP) thus giving it formal status as a LASP Policy Guideline document.

The KELASP provides land development objectives that take into account existing development and biophysical constraints. Spatial development categories have been provided with general conditions to guide activities that may occur within each category, as set out and summarised in the table below (Table 2).

Table 2: KELASP Spatial Planning Categories.

KEY SPC DESCRIPTION	POLICIES
CORE1 Formally Protected Conservation Areas	• No conventional urban development • Formally protected areas, including those under SANParks and CapeNature control, should continue to enjoy the highest levels of protection. • Further continuous corridors between the mountains and the sea, such as that between Nature's Valley on the coast and Garden Route National Park in the Tsitsikamma Mountains, should be promoted. • The municipality should engage with the conservation authorities to ensure that economic growth and employment opportunities from these areas are maximised.
CORE 2 River Corridors and Wetlands	• River corridors and wetlands, including ephemeral pans, must be protected from urban, agricultural, and mining activities to a distance of at least 30 m from their banks unless closer setbacks have been determined by a geohydrologist and freshwater ecologist.
BUFFER 1 Endangered vegetation	• Conservation of endangered vegetation areas shall be encouraged through the promotion of conservancies and stewardship projects with limited eco-tourism development rights and/or donations to formal conservation agencies.
BUFFER 2 Extensive Agriculture / Livestock Grazing	• No development beyond 1 unit per 3 hectares. • Development should be clustered. • No further subdivisions below minimum farm size - Dept of Agriculture. • Rotational grazing nd other veld management best practices shall be promoted so as to improve biodiversity and stocking rates.
INTENSIVE AGRICULTURE Irrigation and Dry Land Crop and Pasture Farming	• No development beyond 1 unit per 3 hectares. • Development should be clustered (no further subdivisions below minimum farm size - Dept of Agriculture). • All existing and potential land suitable for intensive agriculture shall be protected from conversion to other uses including conservation. • Agriculture water demand management must be practices and intensive agriculture water supplies shall be protected and not diverted to other uses. • Investigate methods to bring the agricultural land currently lying fallow back into production if possible.
URBAN SETTLEMENT All land used for Urban purposes in Towns, Villages and Hamlets	• Increase gross average densities to 25du/ha in settlements requiring public transport. • Increase gross average densities to 15du/ha in small rural settlements that do not require public transport. • Urban development shall be promoted within urban settlements according to the settlement planning principles provided for in the broader Bitou SDF.
URBAN EDGE	• Outer boundary of urban settlement aligned to protect natural and agricultural resources and to promote more compact settlements.

	• Urban settlement should primarily be located and encouraged within the Urban Edge. • No urban development shall be permitted outside of the urban edge or identified Development Nodes. • The Urban Edge / Development Nodes should enclose sufficient land to accommodate the settlemen't growth for the next 10-20 years.

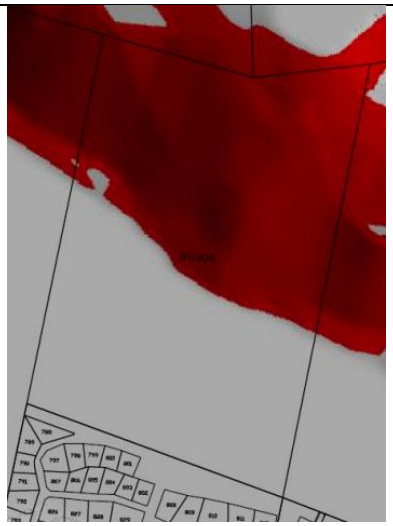
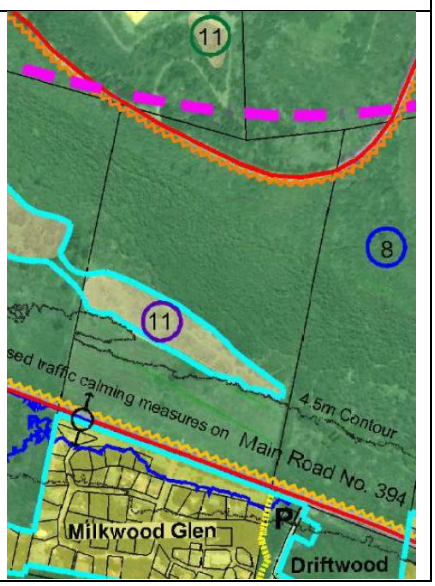
The Policy for River Corridors and Wetlands, which is indicated as running through the south of the property (Appendix B2), is as follows: *River corridors and wetlands, including ephemeral pans, must be protected from urban, agricultural, and mining activities to a distance of at least 30 m from their banks unless closer setbacks have been determined by a geohydrologist and freshwater ecologist.* The mapped aquatic features at the site are associated with estuarine habitat which is mapped according to the contours (5 m.a.m.s.l.) and not the actual habitat present. Ground-truthing of the site by the aquatic specialist confirmed no estuarine habitat present in remnant vegetation at the site, and no hydromorphic indicators in the soil that would indicate wetland conditions. This finding is consistent with previous specialist assessment by K. Coetzee and the Freshwater Consulting Group as indicated in the KELASP (2013). Although the River Corridor implies that wetlands must be protected against urban activities with a 30m buffer, there are no identifiable wetlands within the development site. The spring will be protected within the 20m wildlife corridor, as determined by the aquatic specialist.

The "no-go" development areas in KELASP are determined based on various bio-physical constraints, including the following:

- below the 1:50 and 1:100 year floodlines;
- on any slope with gradient steeper than 1:4;
- below the 4,5 m coastal setback line;
- within the 100m high water mark setback; and
- within the Tshokwane Wetland system.

Table 3: Summary of the "no-go" development areas in KELASP.

KELASP recommendations and guidelines	**Graphic**
Development is not supported in areas below the 1:50 and 1:100 year floodline. Lines indicated are: dark blue = 1:100 year floodline, and light blue area is an 'island' below the 1:50 year floodline. The purple line is the 100m urban coastal setback line. The proposed development area is located outside of all these features and is therefore not flagged from a heightened flood risk perspective.	

Development on steep slopes with a gradient > 1:4 is not supported. The area highlighted in red represents the steeply sloping land on 91/304.	
Development is supported in transformed areas. The related graphic maps the southern portion of the site (proposed for development) as a 'Transformed Area' less sensitive to disturbance with opportunities for development and no natural habitat remaining. The relevant area is mapped in yellow. ***Map Unit 4: Forest*** is excluded from the development footprint, but ***Map Unit 8: Fynbos invaded with aliens*** is partly included within the proposed development footprint.	
Not Within the Tshokwane Wetland system. The 500m regulated area for wetlands around the approximate development area (green). Desktop delineated wetlands are the Tshokwane and slope-base wetlands identified by the Freshwater Consulting Group report in the KELASP (light blue). According to the Keurbooms-Bitou Estuarine Management Plan the property and proposed development area are located above the 100-year floodline and outside of any ecologically sensitive areas associated with the estuary or Tshokwane wetlands. The latter point was confirmed during two site assessments by the aquatic specialists.	
The parameter restricting development below 4,5m contour line was investigated by the freshwater specialist, and was determined to play no role in the functionality of the wetland and is not within an EFZ. Ground truthing by specialists indicated that there is no sound reason why the area below 4,5m contour line should be excluded from the development, as long as all mitigation measures are adhered to. Given this determination, the 6ha of transformed area, as per the KELASP, could be considered for development within the parameter of the coastal corridor node of 12 units / Ha. Lines indicated are: light blue = urban edge, light yellow = Future Proposed Development Nodes, and dark yellow = Existing Development. The 4,5m contour is shown as a black line.	

In terms of the KELASP, the "no-go" development areas where taken into consideration in the preferred layout (see table 3), and the proposal is aligned with its 'Envisaged Outcome' - *It will on the one hand protect and enhance the identified conservation worthy areas through potentially "consolidating" and managing these areas by means of an appropriate conservation management agreement / arrangement, and on the other hand identify appropriate opportunities for spatial development which could support local economic development.*

6. SOCIAL IMPACTS

Summary of potential social impacts identified for the construction phase:

Impacts	Significance without mitigation	Significance with mitigation
Visual impacts	**Minor - negative**	**Negligible - negative**
Creation of direct and indirect employment and skills development opportunities.	**Negligible - negative**	**Negligible - positive**
Nuisance impact (noise and dust)	**Minor - negative**	**Negligible - negative**
Economic multiplier effects	**Negligible - positive**	**Minor - positive**

Summary of potential social impacts identified for the operation phase:

Impacts	Significance without mitigation	Significance with mitigation
Visual and sense of place impacts	**Minor - negative**	**Negligible - negative**
Direct and indirect employment and skills development opportunities.	**Negligible - negative**	**Negligible - positive**
Potential impacts on tourism (-)	**Minor - negative**	**Negligible - negative**
Potential impacts on tourism (+)	**Minor - positive**	**Minor - positive**

Many of the objectors echoed the assertion that the proposed residential development, characterised by what they perceived as high-density, is incongruous with the existing character of Keurboomstrand. However, it is important to note that this development shares significant similarities with other developments in the area, such as Milkwood Glen, and is unlikely to have a profoundly adverse impact on the character of the area. The development neither introduces exceptionally high densities nor a land use that is out of sync with its surroundings; it essentially represents a continuation of the prevailing housing landscape. Furthermore, mitigation measures proposed in the Visual Assessment will ensure landscaping along the road which will soften the impact of the new development (Planning Report, Appendix G6).

Mitigations such as to design buildings and infrastructure to blend with the natural landscape using appropriate materials, colours, and architectural styles will ensure that visual impacts are reduced. The Visual Impact Assessment that was conducted by Paul Buchholz confirmed that the proposed development's low visual impact design and use of appropriate materials, colour selection, and landscaping will ensure that the development blends in very well with its surroundings, creating a minimal change in the landscape. The proposed development, therefore, has a low visual intrusion and, as such, will have a low impact on the character of the area, and subsequently tourism.

Wherever feasible, local labour should be prioritised to ensure that the surrounding communities benefit directly from the project. In addition, local businesses should be given opportunities to participate in construction activities. Procuring labour, services, and products locally during both the construction and operational phases will significantly support the local economy. Maximising local procurement of services and equipment, where possible, will also enhance the economic multiplier effect within the community.

From a social perspective, the project could be developed subject to the implementation of recommended mitigation measures and management actions identified for the project as contained in the EMPr.

7. SOCIAL-ECONOMIC VALUE/CONTRIBUTION

The planned residential estate will create construction jobs for local contractors and labourers. The employment opportunities associated with the construction phase are frequently regarded as temporary employment. However, while these jobs may be classified as "temporary" it is worth noting that the people employed in the construction industry by its very nature rely on "temporary" jobs for their survival. In this regard "permanent" employment in the construction sector is linked to the ability of construction companies to secure a series of temporary projects over a period of time. Each development, such as the proposed development, therefore, contributes to creating "permanent" employment in the construction sector.

The construction industry is an important player in job creation, not only in the construction sector but in other sectors of the economy as well. The construction industry uses a wide range of inputs such as manufacturing of construction materials and equipment, mining of raw materials, forestry, transportation, real estate, finance, and professional services which all contribute indirectly to more jobs that are created across several sectors.

Plettenberg Bay has a very similar demographic profile to the rest of the country. Socio-economic studies indicate high levels of poverty and unemployment. The social needs of the larger community form part of the "surrounding environment" and should receive due consideration when new developments are investigated. The "ripple effect" that a development of this scale has on the local economy and social well-being of the community cannot be ignored.

As the site is currently vacant and not generating any revenue, its continued underutilisation is likely to have a negative impact on the local community. The proposed development is anticipated to improve the quality of life for residents. The lack of development on the site results in an opportunity cost—reflecting the benefits foregone by selecting the "no-go" alternative. As an economic principle, opportunity cost highlights the trade-offs inherent in decision-making. In this context, it signifies the loss of the projected socio-economic benefits. Not proceeding with the project would result in missed economic opportunities.

The anticipated economic impact of the residential development is based on the estimated capital (CAPEX) and operational (OPEX) expenditure costs associated with the development.

Capital expenditure (CAPEX) outlines the potential economic impact during the construction phase of the proposed development. These impacts are temporary occurring for the duration of the construction period, and involves labour-intensive work, professional input, and machinery to complete the development.

Economic Benefits of the Proposed Development during the construction phase:

- Increased Demand for Goods and Services: Local suppliers of construction materials—such as cement, steel, and timber—as well as equipment rental companies, are expected to experience a rise in sales due to increased demand during the construction phase.
- Boost in Business Productivity and GDP: The project will contribute to economic growth, with construction activity driving an increase in output, labour demand, and sector-specific expertise, thereby positively impacting GDP.
- Job Creation: The development will generate temporary employment opportunities, particularly in construction, engineering, and project management. Direct jobs will be created through labour-intensive activities.
- Higher Household Incomes: Employment generated by the project will result in increased household income, stimulating the local economy through greater spending on essential goods and services.

Following the completion of the construction phase, the development will continue to generate economic impacts through its ongoing annual operational activities such as maintaining and upkeeping the common property.

Economic Benefits of the Proposed Development during the operational phase:

- Sustained Demand for Goods and Services: The ongoing requirements for maintenance, security, and local retail will generate continuous business opportunities for service providers in the area.
- Consistent Contribution to GDP: The operational phase of the development is projected to contribute to GDP primarily through services such as property management and utilities.
- Creation of Long-Term Employment: The project will establish permanent positions in property management and maintenance, supporting the long-term upkeep and functionality of the estate. the project will continue supporting local employment and economic activity, aligning with the Bitou Municipality's SDF and IDP goals.
- Stable Growth in Household Income: The operational phase will provide consistent earnings for workers involved in facilities and maintenance services.
- The proposed development is anticipated to enhance the revenue of the Bitou Local Municipality through utility payments generated during its operational phase. Furthermore, it will contribute to municipal income through property rates and taxes paid by residents within the development.

GUIDELINE ON NEED AND DESIRABILITY, EIA GUIDELINE AND INFORMATION DOCUMENT SERIES (MARCH2013)

As per the Guideline Information to be Assessed	EAPs Response
"securing ecological sustainable development and use of natural resources"	
How will this development (and its separate elements/aspects) impact on the ecological integrity of the area?	The proposed development on Portion 91 of the Farm Matjesfontein No. 304 will have several ecological impacts, both negative and positive, on the ecological integrity of the area. Impacts on Ecological Integrity 1. Loss of Indigenous Vegetation • Approximately 4.3 hectares of Endangered Garden Route Shale Fynbos will be cleared. the majority of the area cleared will however be within very low to medium sensitive habitat as the vegetation on the southern part of the site was identified as pasture and secondary vegetation. The southern parts of the site on the flatter lowlands is also more likely to have originally contained some form of coastal thicket (not fynbos). • The site lies within a Critical Biodiversity Area (CBA) and Estuarine Functional Zone (EFZ). 2. Encroachment near Sensitive Features • The development is within 32 metres of a watercourse (a dam and associated spring), which is ecologically significant. • There is also proximity to sensitive features like milkwood trees, forest patches, and sloped terrain, though development avoids steep gradients and flood lines. Mitigation and Design to Preserve Ecological Integrity: 1. Conservation of Undeveloped Land • 83,512 m² (about 8.35 ha) of the property will remain undeveloped and be zoned as Open Space III. • This area will be managed under a Conservation Management Plan and will include: o An ecological corridor for wildlife movement o Protection of the historical fountain o Buffer zones, particularly a 20 m wide buffer between the development and the forest edge. 2. Wildlife Corridor Management • Measures will be taken to restrict human and pet intrusion into the wildlife corridor, including:

	○ ClearVu fencing to prevent domestic animals from entering ○ Dense indigenous vegetation planting for screening ○ Limited human access (e.g., no dogs, mountain biking, or night-time access). 3. Stormwater and Wastewater Management • Stormwater is directed into infiltration ponds, not discharged into natural watercourses. • Treated effluent from the on-site bio-sewage treatment plant will meet DWS Special Limits and be reused for irrigation and toilet flushing. • Groundwater and effluent quality will be monitored monthly. While the development will result in the loss of endangered vegetation and transformation within a CBA, it has incorporated significant ecological mitigation measures, including: • Retention of natural areas • Establishment of a functional wildlife corridor • Controlled stormwater and effluent management • Compliance with environmental buffers and sensitivity assessments If effectively implemented and enforced, these measures could help maintain a degree of ecological functionality despite the development footprint.
How were the following ecological integrity considerations taken into account?	
Threatened Ecosystems,	Ecological integrity was addressed through multiple specialist studies (Appendix G) and informed by the Screening Tool. Sensitive areas, including forest, wetlands, and steep slopes, have been excluded from development. A 20m wide wildlife corridor is included and a Conservation Management Plan (Appendix L) guides biodiversity protection measures. The development site includes Garden Route Shale Fynbos, which is classified as an Endangered Ecosystem, and is also located within a Critical Biodiversity Area (CBA) and the Estuarine Functional Zone (EFZ), increasing its ecological sensitivity The Aquatic specialist has adequately assessed the site and determined that it is not part of an estuarine functional zone. The Terrestrial Biodiversity specialist also determined that the vegetation on site is not representative of Garden Route Shale Fynbos. The southern parts of the site on the flatter lowlands is more likely to have originally contained some form of coastal thicket (not fynbos). The Terrestrial Biodiversity specialist also concluded that no listed threatened or near threatened species would be directly impacted by the development. The preferred development layout was revised to: • Reduce the number of units from 73 to 60 to lower density and pressure on sensitive areas. • Increase erf sizes to align with surrounding properties and reduce footprint intensity.

	• Avoid the most ecologically sensitive areas, including the intact forest and steep slopes Approximately 8.35 hectares (83,512 m²) of the site will be zoned as Open Space III, dedicated for conservation. A 20 m ecological buffer/corridor will be maintained between the development and the forest edge to: • Allow for wildlife movement • Prevent edge effects on forest and fynbos vegetation • Maintain connectivity for ecological processes A Conservation Management Plan (CMP) is included (Appendix L), which guides: • Invasive alien clearing • Buffer zone protection • Wildlife corridor maintenance • Restrictions on landscaping, lighting, and fencing near the sensitive zones. Ongoing monitoring of groundwater, stormwater discharge, and effluent reuse will be implemented to safeguard underlying ecosystems.
Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure	The development is 2,8km from 100m high water mark of the estuary, and outside of the 1:100 year backwater floodline. The floodplain of the estuary downstream from the Development is extensively barriered by building structures and dense vegetation. The development is not in close proximity to coastal shores, estuaries, wetlands, and similar systems. The site is located within an Estuarine Functional Zone as per the 2023 WCSBP. The Aquatic specialist has adequately assessed the site and determined that it is not part of an estuarine functional zone. As per the Aquatic Impact Assessment, one of the development risks within the EFZ relates to flooding which can be exacerbated by climate change and associated sea level rise. The K-BEMP (2018) includes mapped 1:50 and 1:100 year floodlines. The property is located on the edge of the 1:100 year floodline, which is not mapped to extend beyond the boundary of the property. In reality, the frequency of 100-year flood events is increasing due to climate change, and when coincident with sea-level rise and high tide events, it is not impossible that minor flooding could affect the low-lying area of the property in future. This has been considered in the design and layout of the property, and stormwater management should not further exacerbate the flood risk. To this end, Sustainable Drainage Systems (SuDS) will be fully implemented should the development proceed. A small natural spring is present on the site and was identified by the landowner. Water flowing from the spring is stored to a minor extent in a small, excavated pond measuring approximately 2-3 square metres. Soil is very sandy on the site and should therefore be relatively well drained. The dam is roughly circular, and measures approximately 90m² in extent. These features will be protected by a 10m buffer. Sensitive forest patches and steep slopes have been excluded from the development area. A 20m ecological buffer is included.

<table>
<tr><td></td><td>Open Space III zones and a conservation area (~8.3 ha) will remain undeveloped, enhancing habitat protection and resilience.</td></tr>
<tr><td>Critical Biodiversity Areas (“CBAs”) and Ecological Support Areas (“ESAs”)</td><td>The 2023 WCBSP map for the property shows that the northern area of the site below the public road (±41.34%) is within a Critical Biodiversity Area (CBA1: Terrestrial). This indicates that the Garden Route Shale Fynbos on site is considered to be highly important for the conservation of biodiversity in the province as well as for maintaining ecological patterns in the landscape. However, the forest exists in the areas designated as Critical Biodiversity Area 1. A small section along the foot of the slope, is shown as CBA Estuary.

The area of the site north of the CBA1 is classified as Degraded CBA2 (Terrestrial), and to the south it is classified as Degraded CBA2 (Earmarked). However, the CBA2 (Earmarked) to the south of the site, and where the development is proposed, now appears to be unclassified in the updated mapping on CapeFarmMapper. This is reflected in the Terrestrial Biodiversity Assessment.

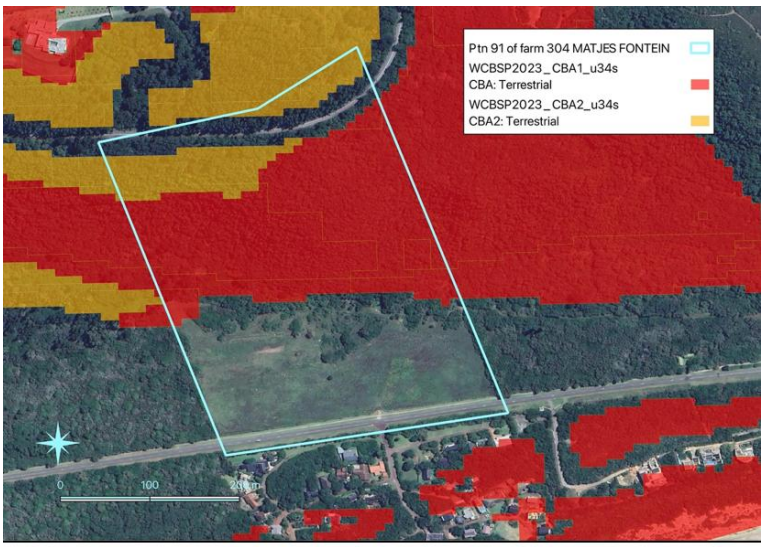
 

Figure 12: Western Cape Biodiversity Spatial Plan of the site and surrounding areas.

The development aims to avoids Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) based on the Biodiversity Overlay Map (Appendix D) and the Western Cape Biodiversity Spatial Plan. Conservation areas and buffers are incorporated to maintain landscape connectivity.</td></tr>
<tr><td>Conservation targets,</td><td>The development footprint was aligned to avoid impacting areas with conservation targets. The site development plan ensures no significant loss of vegetation targeted for conservation. Areas containing indigenous vegetation and forest were designated as Open Space III.

As per Cape Farm Mapper:

<u>Critical Biodiversity Areas:</u>
<table>
<tr><td>Name:</td><td>Garden Route Shale Fynbos</td></tr>
<tr><td>Condition:</td><td>Natural</td></tr>
<tr><td>Category 1:</td><td>CBA: Terrestrial</td></tr>
<tr><td>Category 2:</td><td>CBA: Threatened Ecosystem</td></tr>
</table></td></tr>
</table>

Definition:	Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.
Objective:	Maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.

Name:	Keurbooms
Condition:	Natural
Category 1:	CBA: Aquatic
Category 2:	CBA: Estuary
Definition:	Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.
Objective:	Maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.

Critical Biodiversity Areas (Degraded):

Name:	Garden Route Shale Fynbos
Condition:	Degraded
Category 1:	CBA2: Terrestrial
Category 2:	CBA2: Threatened Ecosystem
Definition:	Areas in a degraded or secondary condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.
Objective:	Maintain in a natural or near-natural state, with no further loss of habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land-uses are appropriate.

Category 1:	CBA2: Terrestrial
Category 2:	CBA2: Earmarked
Definition:	Areas in a degraded or secondary condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.
Objective:	Maintain in a natural or near-natural state, with no further loss of habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land-uses are appropriate.

Conservation targets were taken into account in the Revised BAR primarily through reference to national and provincial biodiversity planning tools, ground-truthed specialist assessments, and the design of the development to support ecological integrity and persistence of biodiversity features.

	The site was assessed using several key biodiversity planning tools including: • Western Cape Biodiversity Spatial Plan (WCBSP) – which identifies Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) based on conservation targets for vegetation types and ecological processes. • Keurbooms & Environs Local Area Spatial Plan (KELASP) – which overlays sensitivity and sets local spatial development limits. These tools helped identify which areas on the property are essential for meeting conservation targets (e.g., intact Garden Route Shale Fynbos and indigenous forest). The development footprint was restricted to a transformed portion of the site, with natural areas avoided to the greatest extent possible. Areas supporting conservation targets (e.g., the forest patch) were excluded from the development footprint, and included in a designated conservation area (Open Space III – 8.35 ha of the total site). The layout was adapted based on specialist advice to improve alignment with conservation planning—for instance, setting the developable area back from the forest edge and adjusting the development to remain within already disturbed zones. Provision for a Functional Ecological Corridor: • A 20-metre-wide ecological corridor along the forest edge was established as a buffer zone, meeting both biodiversity persistence goals and contributing to broader landscape connectivity. • This helps support conservation targets for species movement and ecosystem functioning across the landscape, especially in the context of climate change adaptation. Restoration of indigenous vegetation in CBAs: • Areas identified as secondary vegetation (medium sensitivity) within the 20m wildlife corridor will be restored. Steps will be taken to rehabilitate areas within the buffer zone and encourage growth of species, such as Pterocelastrus tricuspidatus and Sideroxylon inerme, that are mesic and fire-resistant. An open space management system will be developed to formalize such steps for forest protection. • Rehabilitate and improve the small dam on site, including introducing pond margin vegetation typical of mountain ponds in forested areas. This will provide good habitat for various frogs, including potentially Afrixalus knysnae. • Rehabilitation of disturbed areas, as well as previously invaded areas, should promote establishment of site-appropriate indigenous species.
Ecological drivers of the ecosystem	The most important direct drivers of change in ecosystems are habitat change (land use change and physical modification of rivers or water withdrawal from rivers), overexploitation, invasive alien species, pollution, and climate change. No rivers will be impacted and care has been taken to ensure no exploitation of natural resources.

	Based on a detailed field survey by Dr Hoare to verify conditions on site, a detailed landcover and habitat mapping exercise was undertaken for the site. This identified three main habitats occurring on site. These are mapped as Forest, Secondary vegetation and Pastures. There are also transformed areas associated with roads, localised patches of alien trees, and residual individual milkwood trees (*Sideroxylon inerme*). The habitat assessment is important for understanding the suitability of habitat on site for various plant and animal species of concern, which usually have very specific habitat requirements. Following the procedures within the Species Environmental Assessment Guidelines, the forests on site have been assessed as having Very High sensitivity / Ecological Importance, secondary vegetation as having Medium sensitivity / Ecological Importance, and remaining areas Low or Very Low sensitivity. The design respects ecological drivers such as groundwater recharge (via stormwater infiltration), north-facing solar access, and wildlife movement. The 20m ecological corridor protects slope-base recharge areas and facilitates species migration.
Environmental attributes and management proposals contained in relevant Environmental Management Frameworks	Open Space III areas will be managed per a Conservation Management Plan (Appendix L), maintaining ecosystem function and biodiversity. The aim is to preserve pristine indigenous vegetation, with management practices guided by ecological sensitivity mapping. The Garden Route EMF is applicable to the proposed development. The EMF states the following: Specific reference to relevant factors which should be taken into account from a sustainable development perspective is then listed in section (4)(a) to include the following: i. That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied; ii. that pollution and degradation of the environment are avoided, or, where they The Garden Route Environmental Management Framework cannot be altogether avoided, are minimised and remedied; iii. that the disturbance of landscapes and sites that constitute the nation's cultural heritage is avoided, or where it cannot be altogether avoided, is minimised and remedied; iv. that waste is avoided, or where it cannot be altogether avoided, minimised and re-used or recycled where possible and otherwise disposed of in a responsible manner; v. that the use and exploitation of non-renewable natural resources is responsible and equitable, and takes into account the consequences of the depletion of the resource; vi. that the development, use and exploitation of renewable resources and the ecosystems of which they are part do not exceed the level beyond which their integrity is jeopardised; vii. that a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions; and viii. that negative impacts on the environment and on people's environmental rights be anticipated and

	prevented, and where they cannot be altogether prevented, are minimised and remedied. The BAR will address the points above. The focus of these planning tools is on directing development and infrastructural utility service investment, as well as managing and directing ongoing private sector development applications.
Environmental attributes and management proposals contained in relevant Spatial Development Framework, and	The Garden Route SDF aims to promote balanced development that supports the integration and densification of settlements within the District. In general, it promotes the creation of a walkable, integrated, and compact urban environment. The report states that the financial and economic viability of towns in the District should be improved by promoting the intensification of existing urban areas. This can be achieved through infill, densification, and redevelopment, which in turn makes the use of existing infrastructure capacity and services more efficient. This vacant site presents an ideal opportunity for densification and urban infill. The Bitou SDF 2022 identifies the properties as being within a settlement area. The property has been earmarked for development and the proposal is in-line with this land use designation. The property is situated in the Coastal Corridor which is defined by a number of smaller properties located within an approximate 1km offset from the high watermark extending from the Bitou River in the direction of the Keurboomstrand settlement. The Spatial Plan has identified development nodes for this area. For these nodes, a gross density profile of 12 units per ha of the identified transformed footprint area is proposed. The latter is based on the guideline of 15 units per hectare proposed for smaller rural settlements as contained in the Draft Bitou SDF (2013). Furthermore, in general the SDF support the densification of urban areas, although the document does not have any specific densification policy pertaining to this area. The approval of this application would not compromise the integrity of the applicable policy documents agreed to by the relevant authorities.
Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.)	This is not a RAMSAR site, climate change has been taken into consideration with the possibility of increased storm activity. The negative result may be that stormwater from hardened surfaces may lead to soil erosion. This has been addressed by implementing the SUDs principals on site to manage the stormwater. The development is 2,8km from 100m high water mark of the estuary, and outside of the 1:100 year backwater floodline. The floodplain of the estuary downstream from the Development is extensively barriered by building structures and dense vegetation. The housing design has been considered such that site levels will be designed to ensure that homes are not flooded, the floor levels of which will all be set higher than the level of the Road 394, the existing southern flood containment level (Poise January 2025, Appendix F3).

	The Development stormwater management plan mitigates the impact of flood conditions for the Development and ensures that the Development will not negatively impact on surrounding properties under flooding conditions. The 3 attenuation ponds will be designed to ensure no overtopping under 100 year RI storm conditions (Poise January 2025, Appendix F3).
The Impact Mitigation Hierarchy	
How will this development pollute and/or degrade the biophysical environment? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	The negative impacts on the receiving environment that may have resulted in degradation or pollution are as follow: i. Disturbance of vegetation ii. Pollution of water resources iii. Ecological corridors iv. Stormwater and flooding All aspects have been addressed in the BAR and EMPr, with associated mitigation measures. Specialist studies were conducted that recommended mitigation measures in regard to the negative impacts on the receiving environment. The development proposes to conserve 8.35Ha for conservation / biodiversity stewardship, which will remain unfenced. A Conservation Management Plan has been drafted for the management of the open space areas (Appendix L). The proposed open space system of 9 642m^2 within the development footprint corresponds with the position of milkwood trees. This communal open space area will incorporate landscaped gardens and stormwater infiltration ponds systems. The 20m wildlife buffer from the development will protect the forested habitat and allow rehabilitation / restoration of indigenous vegetation within the buffer area.
What waste will be generated by this development? What measures were explored to firstly avoid waste, and where waste could not be avoided altogether, what measures were explored to minimise, reuse and/or recycle the waste? What measures have been explored to safely treat and/or dispose of unavoidable waste?	General waste generated through the construction and operational phase of the project is the responsibility of the contractor / landowner. Refuse such as container bags, gravel, rubble, cans, plastic, wire, etc. generated during the execution of any works must be separated out and stored in appropriately designated areas, removed on a regular basis for disposal at a permitted waste disposal site. All recyclable waste must be separated out with separate containers for paper products, glass, plastic, etc. Any *possible* hazardous waste generated on the site during construction must be kept in a suitably bunded area and removed appropriately.
How will this development use and/or impact on non-renewable natural resources? What measures were explored to ensure responsible and equitable use of the resources? How have the consequences of the depletion of the non-renewable natural resources been considered? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts?	There are four major types of non-renewable resources: oil, natural gas, coal, and nuclear energy. The following technologies are proposed: • Solar geysers and geyser thermal insulation • Solar panels • Use of gas • Energy efficient light bulbs • Low bollard-type lighting • Natural ventilation in certain buildings • Rainwater tanks

What measures were explored to enhance positive impacts?	
How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part? Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds? What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources? What measures were taken to ensure responsible and equitable use of the resources? What measures were explored to enhance positive impacts?	Renewable resources include biomass energy (such as ethanol), hydropower, geothermal power, wind energy, and solar energy. The following technologies are proposed: • Solar geysers and geyser thermal insulation • Solar panels • Use of gas • Energy efficient light bulbs • Low bollard-type lighting • Natural ventilation in certain buildings • Rainwater tanks • Bio Sewage Plant Effluent from the on-site Bio Sewage Plant will be reticulated with each erf being provided with a connection for irrigation and toilet flushing.
Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth or does it reduce resource dependency (i.e. de-materialised growth)? (note: sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life)	Local labour and materials will be used as far as possible during the construction of the development. The proposed development will be self-sufficient as far as possible with services such as solar power, greywater recycling, stormwater infiltration, and a private sewage package plant. The municipality supports phased integration into bulk infrastructure (Appendix E16).
Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra- and intergenerational equity, and are there more important priorities for which the resources should be used (i.e. what are the opportunity costs of using these resources for the proposed development alternative?).	Rainwater will be collected from rooves and stored in rainwater tanks to be used as grey water if a filter system is added the water can be used as potable water. Electricity provision will also be augmented with solar power. The opportunity costs are positive as it will reduce the amount of municipal water supply.
Intra- and inter-generational equity in the context of sustainability"	
Do the proposed location, type and scale of development promote a reduced dependency on resources? For example, can the development be located more appropriately to reduce the dependency of resources needed for service infrastructure?	There is existing water and electricity available that will be utilised. Electricity provision will also be augmented with solar power as well as rainwater harvesting complying with these criteria.
How were a risk-averse and cautious approach applied in terms of ecological impacts?	The EAP, Town Planner, Specialists, and Engineers conducted site visits and completed reports based on best possible option to prevent negative ecological impacts, and the SDP was designed accordingly. The preferred alternative (60 erven at ~500m² each) was selected based on community feedback, ecological constraints, and spatial planning alignment. It balances affordability, biodiversity conservation, and infrastructure feasibility.

What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?	There are currently no known gaps in knowledge pertaining to Intra- and inter-generational equity.
What is the level of risk associated with the limits of current knowledge?	Low level of risk.
Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?	A risk-averse and cautious approach was applied in line with the precautionary principle and the constitutional and environmental mandate of intra- and inter-generational equity. Ground-Truthing and Specialist Studies: • A range of site-specific specialist assessments (biodiversity, freshwater, stormwater, heritage, services) were undertaken to reduce uncertainty. • Ground-truthing of ecological and hydrological features was used to verify or challenge existing planning overlays, e.g., the relevance of the 4.5 m coastal contour line. • This ensured that planning decisions were made on verified, site-specific information, reducing the risk of unforeseen environmental impacts Adoption of Sustainable Infrastructure Design: The development includes low-impact, self-sufficient infrastructure to reduce its burden on natural systems and municipal resources: • Bio-sewage treatment plant producing effluent to DWS Special Limits for safe reuse • Stormwater infiltration ponds and permeable paving to enhance aquifer recharge • Solar energy integration and rainwater harvesting These measures support long-term environmental resilience and reduce the risk of degradation for future generations Responsive Design Adjustments: The layout was modified in response to specialist input and public participation, including: • Lowered density (from 73 to 60 units) • Realigned roads and erven to improve ecological sensitivity and reduce impact This responsiveness reflects a cautious, adaptive planning strategy to reduce risk to both current and future users and the environment. Intra-generational Equity (current generations): • The project responds to a critical housing need for residents in Plettenberg Bay. • Efforts to ensure sustainability, affordability, and environmental quality (e.g., green design, conservation areas) balance current social and ecological needs. Inter-generational Equity (future generations): • Long-term ecological integrity is preserved through: o Dedicated conservation areas o Controlled development footprint o Monitoring commitments (e.g., groundwater, effluent)

	Avoiding overexploitation of resources or placing future burdens on infrastructure or ecosystems ensures sustainability across generations.
A risk averse and cautious approach	
How will the ecological impacts be resulting from this development impact on people's environmental right in terms following	No foreseeable impacts.
Negative impacts: e.g. access to resources, opportunity costs, loss of amenity (e.g. open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?	Access to resources: N/A Opportunity costs: Loss of amenity: The area is earmarked for development. Air and Water quality impacts: No negative impacts are expected. Health Impacts: No health impacts are expected
Positive impacts: e.g. improved access to resources, improved amenity, improved air or water quality, etc. What measures were taken to enhance positive impacts?	Improved access to resources: N/A Improved amenity: The area is earmarked for development. Due to the location a residential development was most suitable for this area. Improved air or water quality: N/A Communities: The proposal will enhance the value of the area and supplement the surrounding land uses. The proposal will result in employment opportunities
Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socio-economic impacts (e.g. on livelihoods, loss of heritage site, opportunity costs, etc.)	Ecosystem goods and services (ES) simply are the benefits that humans receive from nature. These benefits support many aspects of human well-being, including our food and water, security, health and economy. The proposal will enhance the value of the area and supplement the surrounding land uses. The proposal will result in new employment opportunities.
Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives/targets/considerations of the area?	This project will start with investment into local construction companies and their workforce. All local suppliers involved. Permanent employment of staff to manage the day-to-day operations of security estate. The proposal will also secure long-term investment to the area as well as temporary and permanent employment opportunities for the ward. The socio-economic impacts of the proposed development will also contribute to the municipal revenue base. The proposal can be considered to be in line with the IDP enabling an economic environment through local economic development initiatives.
Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the "best practicable environmental option" in terms of ecological considerations?	The consideration of alternatives land use options provides a framework for sound decision-making based on the principles of sustainable development. Key criteria for consideration when identifying alternatives are that they should be "practicable", "feasible", "relevant", "reasonable" and "viable". **Status Quo:** If the land remained undeveloped there will be little benefit for the landowner, the community, or the municipality. **Alternatives:** The developer wants to provide a high-quality yet affordable housing product. To make this project financially

	viable and responsive to the target market, the cost of land, services and build cost need to be limited and in order to do so, a certain economy of scale needs to be attained. The most relevant design aspect to achieve this, is through development density. The property is 14.7ha in size and **Alternative 1** proposed 73 units of approximately 375m², which calculates to a gross density 5 units per ha. The nett density is calculated excluding the undevelopable steep slopes and forest vegetation to the north of the site. The identified development area measures approximately 6ha and 73 units will calculate to a net density of 12 units per ha, which is not regarded as high density. This density correlate with the proposed density profile of 12 units per ha of the identified transformed development nodes as set out in the Local Spatial Plan. To bring the above density into perspective, medium-density housing is generally characterized by a density of 30 to 40 dwelling units per hectare (gross), while high-density residential areas, typically situated in inner urban locales with high-rise structures and mixed-use components, can exhibit densities ranging from 40 to 100 units per hectare. Based on the objections received during the initial public participation phase conducted as part of the Basic Assessment process, it is evident that the local community is predominantly concerned about the perceived high density of the development and the potential demographic it might attract, and how this may impact on their own property values. In an effort to address the concerns of neighbouring residents, the original development concept has been revised by reducing the density from 73 to 60 units, concurrently increasing property sizes from approximately 375m²to approximately 500m². As a result, the development's gross density now stands at approximately 4 units per hectare, while the net density is approximately 10 units per hectare. These adjusted figures align more closely with the surrounding neighbourhood densities while is still allows for enough units to be financially viable and affordable to the end user. The proposed density is high enough to be financially viable, yet low enough to fit into the surrounding area.
Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and existing and other planned developments in the area?	There are no cumulative impacts expected if all mitigation measures are adhered too.
"Promoting justifiable economic and social development"	
What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?	
The IDP (and its sector plans' vision, objectives, strategies, indicators and targets) and any other strategic plans, frameworks of policies applicable to the area	Please refer to the town planning report.
Spatial priorities and desired spatial patterns (e.g. need for integrated of segregated communities, need to	Efficiency relates to the form of settlements and use of resources - compaction as opposed to sprawl; mixed-use, as opposed to mono-functional land, uses; residential areas close to work

upgrade informal settlements, need for densification, etc.)	opportunities as opposed to dormitory settlement. This principle can only be address through spatial development frameworks. The Bitou SDF supports this principle in its strive to limit urban development to certain areas. Being compatible with the SDF can therefore be regarded as being compatible with the principle of Spatial Efficiency.
Spatial characteristics (e.g. existing land uses, planned land uses, cultural landscapes, etc.), and	The sustainable use of provincial assets is one of the main aims of the Western Cape Provincial Spatial Development Framework 2014. The protection of the non –renewable natural and agricultural resources is achieved through clear settlement edges for towns by defining limits to settlements and through establishing buffers/transitions between urban and rural areas.
Municipal Economic Development Strategy ("LED Strategy")	Property rates are an important source of general revenue for municipalities. Revenue from property rates is used to fund services that benefit the community as a whole. These include installing and maintaining streets, roads, sidewalks, lighting, and storm drainage facilities; operating parks, recreational facilities, and cemeteries. Property rates revenue is also used to fund municipal administration, and costs of governance. High-value properties, yielding high property rates have a very important role to play in municipal finance.
Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area?	
Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?	The development will provide skills development opportunities during the construction phase and will make use of local labour.
How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts	The well-positioned and designed development infrastructure allows for it to blend in very well with its surroundings and create minimal contrast in the landscape. With the implementation of appropriate mitigation measures the preferred and alternative development layouts can be effectively screened from the road.
How will this development address the specific physical, psychological, developmental, cultural and social needs and interests of the relevant communities? • Will the development result in equitable (intra- and inter-generational) impact distribution, in the short- and long-term? Will the impact be socially and economically sustainable in the short- and long-term?	Spatial justice principles seek to eliminate spatial injustices that result from discrimination and marginalisation. Inequitable access to housing, educational and economic opportunities, and health facilities are consequences of spatial injustice. The instruments used to promote spatial justice include Spatial Development Frameworks, Precinct Plans, and Urban Regeneration Plans and Policies. The location of this private property on the outer limits of the urban area cannot directly contribute to spatial reform and integration.
In terms of location, describe how the placement of the proposed development will:	
result in the creation of residential and employment opportunities in close proximity to or integrated with each other	Employment opportunities will be created for skilled an un skilled labour. Several communities reside in the Plettenberg Bay area who will be able to benefit from employment opportunities. Wherever feasible, local labour should be prioritised to ensure that the surrounding communities benefit directly from the project. In addition, local businesses should be given opportunities to participate in construction activities. Procuring labour, services, and products locally during both the construction and

	operational phases will significantly support the local economy. Maximising local procurement of services and equipment, where possible, will also enhance the economic multiplier effect within the community.
reduce the need for transport of people and goods,	N/A
result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport),	No.
compliment other uses in the area,	The planned residential development will be similar to existing and planned residential developments to the south of the property, Milkwood Glen Residential Complex, which consists of about 50 Group Housing erven and communal open space. The site lies within the urban edge for Plettenberg Bay and the proposed residential development is compatible with surrounding land uses. The proposal is sensitive towards the character of the area and attempts to create a unique sense of place that will blend in and compliment the ambience of the surrounding area.
be in line with the planning for the area,	This property has been included in the urban edge and has been earmarked for urban development.
for urban related development, make use of underutilised land available within the urban edge	The urban fringe must ensure that urban expansion is structured and directed away from environmentally sensitive land and farming land; agricultural resources are reserved; environmental resources are protected; appropriate levels of services are feasible to support urban fringe land uses, and land use allocations within the urban fringe are compatible and sustainable.
optimise the use of existing resources and infrastructure,	Eskom power and the municipal water will be used.
consider opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement),	N/A
discourage "urban sprawl" and contribute to compaction/densification,	The proposal supports this principle of spatial sustainability in the sense that it proposes a compact development within the urban edge, thereby limiting the need for urban sprawl and encouraging the optimal use of existing urban land and services.
contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs,	Spatial justice principles seek to eliminate spatial injustices that result from discrimination and marginalisation. Inequitable access to housing, educational and economic opportunities, and health facilities are consequences of spatial injustice. The instruments used to promote spatial justice include Spatial Development Frameworks, Precinct Plans, and Urban Regeneration Plans and Policies. The location of this private property on the outer limits of the urban area cannot directly contribute to spatial reform and integration.
encourage environmentally sustainable land development practices and processes	Yes.
take into account special locational factors that might favour the specific	Keurboomstrand is located within convenient proximity to essential services:

location (e.g. the location of a strategic mineral resource, access to the port, access to rail, etc.)	• Beaches: Keurboomstrand, Lookout Beach (within 5 km) • Shopping: Market Square, Look Out Centre (4.7–5.5 km) • Healthcare: Mediclinic Plettenberg Bay, local clinics (approx. 5.9 km) • Education: Several primary and pre-primary schools within 6–7 km • Police Services: 6–9 km to nearest SAPS stations
result in investment in the settlement or area in question that will generate the highest socio- economic returns (i.e. an area with high economic potential),	The proposal responds to the need for housing in Plettenberg Bay and will, contribute to job creation, municipal revenue, and economic growth in the town. The Garden Route SDF states that financial and economic viability of towns in the District should be improved by promoting the intensification of existing urban areas. This can be achieved through infill, densification, and redevelopment, which in turn makes the use of existing infrastructure capacity and services more efficient.
impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area, and	The proposal is sensitive towards the character of the area and attempts to create a unique sense of place that will blend in and compliment the ambience of the surrounding area.
in terms of the nature, scale and location of the development, promote or act as a catalyst to create a more integrated settlement?	No, the location of this private property on the outer limits of the urban area cannot directly contribute to spatial reform and integration.
How were a risk-averse and cautious approach applied in terms of socio-economic impacts?	
What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?	There are no gaps in Knowledge.
What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge?	None.
Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development (and its alternatives)?	N/A
How will the socio-economic impacts be resulting from this development impact on people's environmental right in terms following:	
Negative impacts: e.g. health (e.g. HIV-Aids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?	The proposed development will not impact on this.
Positive impacts. What measures were taken to enhance positive impacts?	Local labour will be used, and assist in developing skills.
Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socio-economic impacts will result in ecological impacts	No ecosystem services will be impacted upon.

(e.g. over utilisation of natural resources, etc.)?	
What measures were taken to pursue the selection of the "best practicable environmental option" in terms of socio-economic considerations?	The planned residential estate will create construction jobs for local contractors and laborers. The employment opportunities associated with the construction phase are frequently regarded as temporary employment. However, while these jobs may be classified as "temporary" it is worth noting that the people employed in the construction industry by its very nature rely on "temporary" jobs for their survival. In this regard "permanent" employment in the construction sector is linked to the ability of construction companies to secure a series of temporary projects over a period of time. Each development, such as the proposed development, therefore contributes to creating "permanent" employment in the construction sector.
What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)?	Use of local labour and materials. The construction industry is an important player in job creation, not only in the construction sector but in other sectors of the economy as well. The construction industry uses a wide range of inputs such as manufacturing of construction materials and equipment, mining of raw materials, forestry, transportation, real estate, finance, and professional services which all contribute indirectly to more jobs that are created across several sectors.
Considering the need for social equity and justice, do the alternatives identified, allow the "best practicable environmental option" to be selected, or is there a need for other alternatives to be considered?	The alternative allows the best practicable option, there is no need to assess another alternative.
What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?	No environmental resources will be impacted. The proposal will not deplete scarce natural and agricultural resources and will not have a negative impact on the surrounding built environment.
What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle? 62 o What measures were taken to:ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge?	No traditional or ordinary knowledge is applicable. A public participation process is in process to ensure all needs and values of affected parties are being taken into consideration.
Opportunity Cost: Describe how the development will impact on job creation in terms of, amongst other aspects:	
the number of temporary versus permanent jobs that will be created	The planned residential estate will create construction jobs for local contractors and laborers. The employment opportunities associated with the construction phase are frequently regarded as temporary employment. However, while these jobs may be classified as "temporary" it is worth noting that the people employed in the construction industry by its very nature rely on "temporary" jobs for their survival. In this regard "permanent" employment in the construction sector is linked to the ability of

	construction companies to secure a series of temporary projects over a period of time. Each development, such as the proposed development, therefore contributes to creating "permanent" employment in the construction sector. It is estimated that the residential development is expected to generate approximately 495 temporary employment opportunities through direct, indirect, and induced effects. Of these, 92 positions will be created directly during the construction phase of the project. Further permanent job opportunities will exist throughout the operation phase of the residential estate.
whether the labour available in the area will be able to take up the job opportunities (i.e. do the required skills match the skills available in the area)	Yes only local labour will be used. The Bitou Municipality, which includes Plettenberg Bay and Keurboomstrand, has high unemployment, particularly among low- and semi-skilled individuals. Construction and basic civil works (roads, water, sewerage, landscaping) will generate demand for: • General labourers • Bricklayers, plumbers, electricians, roofers • Gardeners and security staff These skills are generally available locally, particularly within nearby communities such as Kwanokuthula and New Horizons, which are known to have labour pools suited for construction-phase work.
the distance from where labourers will have to travel	Approximately 10 km during operational phase, construction phase labourers will in all probability come from the municipal area. The site is located approximately: • 10 km from Kwanokuthula • 6–8 km from New Horizons • 1.8 km from Keurboomstrand Travel distances are reasonable, so opportunity cost is low and not a barrier to employment.
the location of jobs opportunities versus the location of impacts (i.e. equitable distribution of costs and benefits), and	Local labours within the vicinity will be used.

the opportunity costs in terms of job creation (e.g. a mine might create 100 jobs in the short and medium term, but impact on 1000 permanent agricultural jobs, etc.).	There would have been no employment opportunity, the alternative allows for temporary employment opportunity during construction phase and permanent employment opportunities during operational phase.
	
	Construction Phase
	• Temporary employment for:
	  o Labourers and skilled workers
	  o Contractors and subcontractors
	  o Local suppliers of materials and services
	• Indirect jobs via:
	  o Transport, catering, security, and equipment rental
	
	Operational Phase
	• Ongoing jobs in:

	o Security (gated estate) o Maintenance of open spaces, gardens, stormwater systems o Administration (e.g. HOA, property management) While the construction phase creates more jobs, the operational phase provides longer-term employment, albeit at a smaller scale.
What measures were taken to ensure	
that there were intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment, and	A town planner was appointed.
that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?	At this stage there is no conflicts, the PPP still needs to be completed to address this section.
What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people's common heritage?	The development is on private property.
Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?	Yes, no long-term burden is expected.
What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects will be borne by those responsible for harming the environment?	During construction phase an EMPr will be applicable, environmental training will be provided and an ECO appointed. A yearly audit is recommended to ensure compliance with Environmental Authorisation if granted.
Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations?	Employment opportunities will be created for skilled an un skilled labour. Several communities reside in the area who will be able to benefit from employment opportunities during construction phase and operational phase.
Describe the positive and negative cumulative socio-economic impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and other planned developments in the area?	Empowerment of the local community members living in the area relating to temporary employment opportunities: • Use existing social structures and communication channels to ensure social representation. • The planned residential estate will create construction jobs for local contractors and laborers. The construction industry is an important player in job creation, not only in the construction sector but in other sectors of the economy as well. The construction industry uses a wide range of inputs such as manufacturing of construction materials and

	equipment, mining of raw materials, forestry, transportation, real estate, finance, and professional services which all contribute indirectly to more jobs that are created across several sectors. Property rates are an important source of general revenue for municipalities. Revenue from property rates is used to fund services that benefit the community as a whole. These include installing and maintaining streets, roads, sidewalks, lighting, and storm drainage facilities; operating parks, recreational facilities, and cemeteries. Property rates revenue is also used to fund municipal administration, and costs of governance. High-value properties, yielding high property rates have a very important role to play in municipal finance.