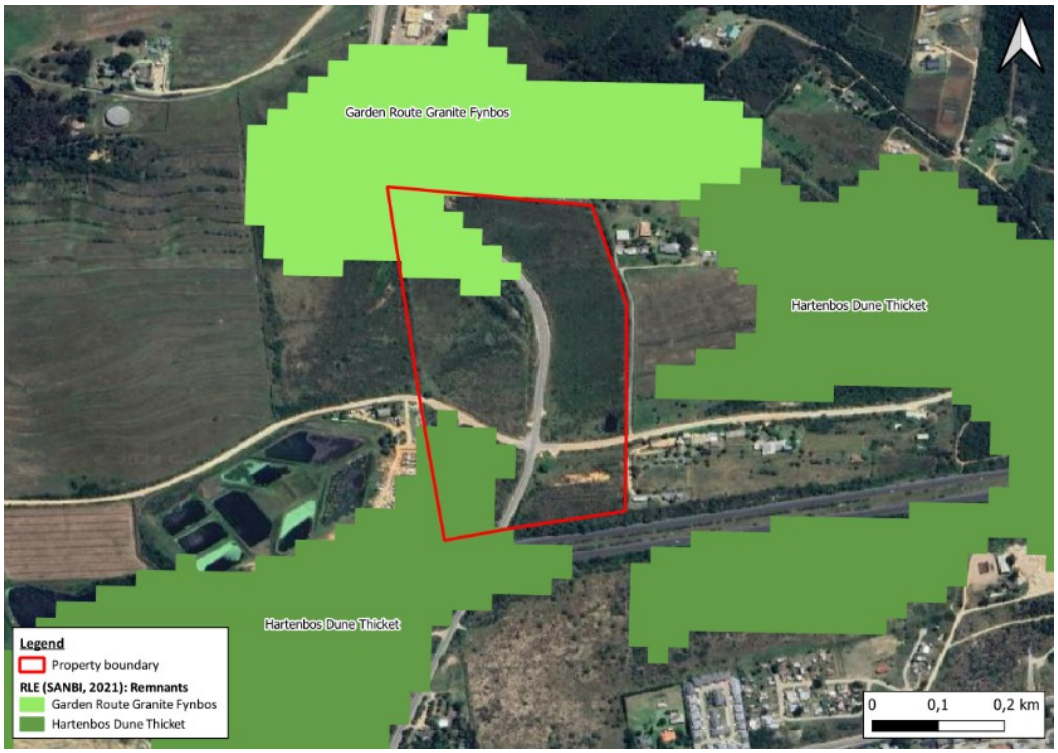
Draft NEMA S24G Application form

In terms of the **National Environmental Management Act** (Act No. 107 of 1998, as amended) & 2014 Environmental Impact Regulations as amended for:

NEMA Section 24G Environmental Authorisation Process
Proposed mixed use / light industrial development on RE/ 139 Farm Zandhoogte
Mossel Bay District Municipality
24G Reference: 14/1/1/E3/9/2/3/L1270/22
For 30-day review and comment



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DATE:	**27 August 2025 – 29 September 2025**

Glossary of Terms

CBA	CBA Critical Biodiversity Area – Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.
DEADP	Western Cape Department of Environmental Affairs and Development Planning
DFFE	Department of Forestry, Fisheries and the Environmental
DWS	Department of Water and Sanitation
EAP	Environmental Assessment Practitioner – An EAP and a specialist, appointed in terms of regulation 12(1) or 12(2) must – be independent. Have expertise in conducting environmental impact assessments or undertaking specialist work as required, including knowledge of the Act, these regulations and any guidelines that have relevance to the proposed activity. Ensure compliance with these Regulations Perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the application. Take into account, to the extent possible, the matters referred to in regulation 18 when preparing the application and any report, plan or document relating to the application; and Disclose to the proponent or applicant, registered and affected parties and the competent authority all material information in the possession of the EAP and, where applicable, the specialist, that reasonably has or may have the potential of influencing – Any decision to be taken with respect to the application by the competent authority in terms of these regulations; or The objectivity of any report, plan or document to be prepared by the EAP or specialist, in terms of these Regulations for submission to the competent authority; unless access to that information is protected by law, in which case it must be indicated that such protected information exists and is only provided to the competent authority. (2) In the event where the EAP or specialist does not comply with sub regulation (1)(a), the proponent or applicant must, prior to conducting public participation as contemplated in chapter 5 of these regulations, appoint another EAP or specialist to externally review all work undertaken by the EAP or specialist, at the applicants cost. (3) An EAP or specialist appointed to externally review the work of an EAP or specialist as contemplated in sub regulation (2), must comply with sub regulation (1).
ECO	Environmental Control Officer – A site agent who needs to ensure that all environmental authorisation and conditions are adhered to during the construction phase of the project.
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme – can be defined as “an environmental management tool used to ensure that undue or reasonably avoidable adverse impacts of the construction, operation and decommissioning of a project are prevented; and that the positive benefits of the projects are enhanced”.

ESA	Ecological Support Area – Areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of PAs or CBAs and are often vital for delivering ecosystem services.
GA	General Authorisations
IAP	Interested and Affected Party/ies - in relation to an application, means an interested and affected party whose name is recorded in the register opened for that application in terms of regulation 42.
MBDM	Mossel Bay District Municipality
MMP	Maintenance Management Plan – means a maintenance management plan for maintenance purposes defined and adopted by the competent authority
NEMA	National Environmental Management Act (Act 107 of 1998) as amended 2017 – national environmental legislation that provides principles for decision-making on matters that affect the environment.
NWA	National Water Act (act 36 of 1998)
PA	Protected Area - A protected area is an area of land or sea that is formally protected by law and managed mainly for biodiversity conservation. Protected areas recognised in the National Environmental Management: Protected Areas Act (Act 57 of 2003) (hereafter referred to as the Protected Areas Act) are considered formal protected areas in the NPAES. This is a narrower definition of protected areas than the International Union for Conservation of Nature (IUCN) definition.1 The NPAES distinguishes between land-based protected areas, which may protect both terrestrial and freshwater biodiversity features, and marine protected areas.
SANBI	South African National Biodiversity Institute
WULA	Water use license application
WUL	Water use license

EXECUTIVE SUMMARY

1. INTRODUCTION

Sapphire Ocean Investments (RF) (Pty) Ltd (the Applicant) intends to develop a mixed/light industrial development on RE/ 139, Zandhoogte, located near Groot Brakrivier, within the Western Cape Province. The property is zoned as Agriculture Zone 1 and is approximately 18.5 ha in extent and located north of the N2 in Tergniet. Zandhoogte Road traverses the property (East to West) and Sorgfontein Road traverses the property (north to south) dividing the property into four portions. Approximate central coordinates: 34° 3'28.02"S; 22°11'22.60"E

Figure 1: Location of the project area in relation to Groot Brakrivier.

The property was originally utilised for agriculture (crop production) (estimated since 1963) but has not been farmed since 2014. In 2020 approximately 2.5 ha of the property was cleared (south eastern corner). On 31 October 2022, the Western Cape Department of Environmental Affairs and Development Planning (DEADP) issued a Pre-Compliance Notice to Ideal Trading (landowner at the time) informing that the activities undertaken to develop a brickworks are deemed to be unauthorised since vegetation was removed and material was excavated/moved without prior Environmental Authorisation (Appendix J1). Clearing activities ceased; Ideal Trading was given the option to either apply for retrospective authorisation through means of a Section 24G process, or to restore and rehabilitate the area to its natural condition. Ideal Trading opted to restore and rehabilitate the affected area. The rehabilitation plan, prepared by Cape Environmental Assessment Practitioners (Pty) Ltd, November 2022 (Appendix J2) was accepted on 7 February 2023 (Appendix J3). No further clearing or development activities have since taken place (DEADP Reference: 14/1/1/E3/9/2/3/L1270/22).

The new landowner (Sapphire Ocean Investments (RF) (Pty) Ltd) acquired the land in 2023 and is proposing to develop a mixed use / light industrial development on the property. The proposed development envisages the development of 183 storage units and 40 light industrial workshops.

In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the 2014 Environmental Impact Assessment (EIA) regulations (as amended, 2017), the proposed development requires an

environmental authorisation (EA) to be issued by the Western Department of Environmental Affairs and Development Planning (DEADP) prior to the commencement of construction. A S24G application process will be followed due to clearing of the vegetation that took place without the required Environmental Authorisation (EA).

2. Environmental Sensitivities

The DFFE National Screening Tool (Appendix M) generated for the site indicates the following environmental sensitivities which has assisted in the identification of potential impacts:

- Agriculture theme: High sensitivity
- Animal species theme: High sensitivity
- Aquatic biodiversity theme: Low sensitivity
- Archaeological and Cultural Heritage theme: Low sensitivity
- Civil aviation theme: Medium sensitivity
- Defence theme: Low sensitivity
- Palaeontology theme: Very High sensitivity
- Plant species theme: Medium sensitivity.
- Terrestrial biodiversity theme: Very High Sensitivity

The following specialist assessments have been carried out:

- A Terrestrial biodiversity assessment, including flora and fauna, was carried out in May 2024 by Biodiversity Africa on behalf of new landowner; the illegally cleared area has revegetated over the past 4 years; this area, prior to disturbance in 2020, was an already transformed area (i.e., agricultural activities ceased in 2014 and clearing took place six years later) (Provided in Appendix H1).
- An aquatic study was carried out (Upstream consulting) and the aquatic compliance statement is provided as Appendix H2.
- A palaeontological assessment has been carried out (Dewald Wilken) and provided as Appendix H3.
- A Traffic Impact report has been prepared by Element Consulting Engineers on behalf of the new landowner (Appendix H4)
- A site sensitivity verification was carried out by Benjamin Walton for Cape Vegetation Surveys on behalf of the current landowner in September 2022 (Provided in Appendix H5)

The verification of environmental sensitivities is provided in Table 1.

Table 1: Verification of environmental sensitivity identified in DFFE screening tool report

Theme	Environmental sensitivity as per screening tool report	Verification of environmental sensitivity	Description
Agricultural	Very High	Medium to low	Degraded site due to long term intensive agricultural use.
Aquatic Biodiversity	Low	Low	No sensitive aquatic features are mapped on the site. Two artificial wetlands (old farm dams) are on the site, in the north western section within the mapped CBA (WC BSP, 2023) and in the SE section; both will be retained. There are no natural watercourses that will be impacted by the project, and the proposal will not result in reduced aquatic biodiversity
Archaeological and Cultural Heritage	Low	Low	No heritage sites are on the property. Chance find procedure to be included for any excavations required. A palaeontological assessment has been carried out. The required NID has been submitted to WC Heritage.
Paleontological	Very High	Very High	

Theme	Environmental sensitivity as per screening tool report	Verification of environmental sensitivity	Description
Animal Species	High sensitivity	Medium	Specialist verification and assessment has been carried out. In terms of the Guidelines for Interpreting SEI in the Context of the Proposed Development Activities (SANBI, 2020) for areas of MEDIUM SEI, development activities of medium impact are acceptable if followed by appropriate restoration activities. In the case of the project development, all impacts are expected to be low to negligible which is acceptable.
Plant Species Assessment	Medium sensitivity	Very Low	Specialist verification and assessment has been carried out. Historical clearance of vegetation over a prolonged period, and the disturbance of the soil and seedbank resulted in species composition no longer representative of the original habitat.
Terrestrial Biodiversity Impact	Very High Sensitivity	Low	Specialist verification and assessment has been carried out. The project footprint will not impact the functioning of any Endangered Ecosystems, Protected Areas, or NPAES Focus Areas as these features were not recorded within or surrounding the project area. Impacts associated with the Biodiversity Theme are therefore considered to be low to negligible.
Civil Aviation Assessment			A civil aviation assessment / compliance statement is excluded as the development will not have an impact on civil aviation aerodrome.
Defence theme			A defence them compliance statement is excluded as the development will not have an impact on the defense theme.

3. IMPACT ASSESSMENT SUMMARY

Two site development plans (SDPs) have been provided by A Enslin Archi Designs; the initial SDP is provided as Appendix B1; the preliminary SDP alterative 2, included in the bulk services report, is provided as Appendix B2.
A bulk services report has been prepared by Element Consulting Engineers, January 2025, on behalf of the new landowner (Appendix B3). Following the assessment and identification of sensitivities the SDP was revised as provided as Appendix B4.

All information perused as well as recent specialist reports provided have been used by the EAP to present the baseline conditions. Past, existing and proposed activities are assessed. Relevant alternatives are assessed, and recommendations are provided to inform the final SDP and related plans for the proposed development. The mitigation measures are provided in the draft EMPr (Appendix I).

The following activities included in Listing Notices (LN) 1 and 3 of the 2014 Environmental Impact Assessment (EIA) Regulations (as amended, 2071) published in terms of National Environmental Management Act (Act 107 of 1998) (NEMA) are assessed:

- Clearance of indigenous vegetation (LN3, activity 12; LN 1 activity 27)
- Change of land use from agriculture to light industrial use (LN1, Activity 28)

The vegetation of the project area has been classified as ‘secondary shrubland’ characterised by low dense and open shrubland dominated by indigenous pioneer species with a grassy ground cover and scattered alien invasive species and weeds. Species diversity was found to be low and not representative of the historical natural vegetation types (i.e. Hartenbos Dune Thicket; Garden Route Granite Fynbos).

The main impacts associated with the activities include the following:

- Loss of indigenous vegetation and associated biodiversity and habitats
- Increased runoff
- Susceptibility of some areas to erosion
- Invasion by exotic and alien invasive species and ongoing removal
- Fire risk
- Impact on socio-economic conditions as a result of employment opportunities
- Impact on socio-economic conditions as a result of light industrial activities on an infill development site

Several impacts were identified and assessed for construction and operational phases. Measures are provided to prevent anticipated impacts and enhance positive impacts, where possible. The impacts are rated without and with recommended mitigation measures in place. A summary is provided in Table 2.. The EMPr is provided as Appendix I.

Conclusion

The proposed light industrial activity is considered to be aligned with surrounding (and proposed) land uses, including the WWTW to the west, a proposed mixed development south of the N2 and the existing light industrial area north of the site.

In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the 2014 Environmental Impact Assessment (EIA) regulations (as amended, 2017), the proposed activities requires an environmental authorisation to be issued by the Western Cape Department of Economic Development and Environmental Affairs before development can commence.

Permits for protected trees and flora and fauna species and conservation concern will be required from Cape Nature; relevant permits required are included in the EMPr. A general authorisation for NWA Section 21 c and I water uses will be required to authorised development within 500 meters of artificial / natural wetlands (i.e. DWs regulated area).

The draft S24 g application form and appendices (this report) will be distributed to all registered interested and affected parties for a 30-day review and comment period. The application will then be updated with all comments received and responses to the comments and the final S24G application will be submitted to the DEADP for decision making.

Table 2: Summary of impact assessment

PLANNING					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Planning and Design				
Aspect	EA and budget allocation for requirement management measures				
Nature of Impact	Direct – Project delays and economic consequences				
Description of Impact	Commencement prior to required approvals in place can lead to delays in project and economic loss; insufficient budget allocation to environmental management can result in impacts before mitigation.				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium High	17	Negative Low	10
HERITAGE ARCHAEOLOGY AND PALEONTOLOGY					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction and operations (as required for maintenance)				
Aspect	Excavation activities				
Nature of Impact	Direct – loss of historical resources				
Description of Impact	Loss of paleontological &/or archaeological resources - The DFFE screening tool report indicates a very high sensitivity for palaeontological, and low sensitivity for archaeological and cultural heritage. a NID and accompanying assessment will be submitted to Western Cape Heritage				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Low	10	Positive Low	10
No-go alternative	Baseline conditions will remain the same – negligible impacts on heritage resources.				
TERRESTRIAL BIODIVERSITY					
The entire project area was utilised for agriculture for at least 50 years and then left fallow since about 2014. A portion of terrestrial CBA remain in the NW and SW corners of the site. The					

<table>
<tr><td colspan="2">NW CBA section of the site has mostly been avoided in the alternative SDP due to steep terrains; however, the development is recommended to be shifted completely out of this area, which will require a slight reduction in the hard development footprint (2500m2) in this NW area (As per SDP in Appendix D4). Impacts associated with the Terrestrial Biodiversity Theme are considered to be low to negligible in the specialist report; the underlying drivers of the CBA and 2017 ESA status of a portion of the project area, are not present</td></tr>
<tr><td>Activity</td><td>Planning for construction and operation of the proposed warehouse storage and light industrial workshops</td></tr>
<tr><td>Layout</td><td>Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)</td></tr>
<tr><td>Phase</td><td>Construction and operations (as required for maintenance)</td></tr>
<tr><td>Aspect</td><td>Construction activities – site clearing, earthworks, excavations, lay down areas</td></tr>
<tr><td>Nature of impact</td><td>Direct - Disturbance of terrestrial biodiversity and ecological processes on the site</td></tr>
<tr><td>Description of Impact</td><td>Construction activities can result in disturbances outside the development footprint and impacts on ecological processes and terrestrial biodiversity</td></tr>
<tr><td>Impact Rating</td><td><table>
<tr><td></td><td>Without mitigation</td><td></td><td>With mitigation</td><td></td></tr>
<tr><td>Impact Significance</td><td>Negative Medium</td><td>14</td><td>Negative Low</td><td>7</td></tr>
</table></td></tr>
<tr><td>Phase</td><td>Operational</td></tr>
<tr><td>Aspect</td><td>Operational activities –maintenance</td></tr>
<tr><td>Nature of Impact</td><td>Disturbance to terrestrial biodiversity and ecological processes</td></tr>
<tr><td>Description of Impact</td><td>Poor management practices can result in impacts to surrounding natural areas and ecological processes.</td></tr>
<tr><td>Impact Rating</td><td><table>
<tr><td></td><td>Without mitigation</td><td></td><td>With mitigation</td><td></td></tr>
<tr><td>Impact Significance</td><td>Negative medium</td><td>14</td><td>Negative Low</td><td>7</td></tr>
</table></td></tr>
<tr><td colspan="2">INDIGENOUS VEGETATION AND SPECIES OF CONSERVATIONAL CONCERN</td></tr>
<tr><td colspan="2">Due to the historical clearance of vegetation over a prolonged period, and the disturbance of the soil and seedbank, these areas are unlikely to have a species composition representative of the original habitat (SANBI, 2020). The vegetation of the project area has been classified as ‘secondary shrubland’.</td></tr>
<tr><td>Activity</td><td>Past agricultural activities (estimated 1963 until 2014)</td></tr>
<tr><td>Layout</td><td>NA</td></tr>
<tr><td>Phase</td><td>Operations</td></tr>
<tr><td>Aspect</td><td>Crops</td></tr>
<tr><td>Nature of impact</td><td>Direct / cumulative - Loss of indigenous vegetation and disruption to associated fauna, habitats and forage areas</td></tr>
<tr><td>Description of Impact</td><td>Past agricultural activities (estimated 1963 until 2014) resulted in loss of indigenous vegetation and SCC - The loss of the entire project area (18.5 ha) would constitute a habitat loss of 0.002% for identified plant SCC.</td></tr>
<tr><td>Impact Rating</td><td><table>
<tr><td></td><td>Without mitigation</td><td></td><td>With mitigation – not applicable</td><td></td></tr>
<tr><td>Impact Significance</td><td>Negative Medium high</td><td>17</td><td></td><td></td></tr>
</table></td></tr>
<tr><td>Activity</td><td>Clearing activities by Ideal training in 2020 on SW portion</td></tr>
<tr><td>Layout</td><td>SW portion (2.5 ha)</td></tr>
<tr><td>Phase</td><td>Construction</td></tr>
<tr><td>Aspect</td><td>excavation</td></tr>
<tr><td>Nature of impact</td><td>Direct - Loss of indigenous vegetation and disruption to associated fauna, habitats and forage areas</td></tr>
</table>

Description of Impact	Loss of secondary shrubland and indigenous pioneer species. The loss of the disturbed area (2.5 ha) would constitute a habitat loss of 0.0002% for identified plant SCC.				
Impact Rating		Without mitigation		With mitigation – not applicable	
	Impact Significance	Negative Medium	12		
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction				
Aspect	Site clearing and construction activities on 18 ha				
Nature of Impact	Direct – Loss of indigenous vegetation on 18 ha and potential loss of SCC				
Description of Impact	Site clearing will result in loss of indigenous vegetation and could result in loss of SCC. Loss of vegetation is a permanent impact. The site will be completely transformed to a light industrial / storage warehouse area.				
Impact Rating		Without mitigation		With mitigation (including recommendations for layout 3)	
	Impact Significance	Negative Medium	13	Negative Low	10
Phase	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Aspect	Alternative SDP in bulk services report (Appendix B)				
Nature of Impact	Operations (as required for maintenance)				
Description of Impact	Poor maintenance activities during operational phase can result in the permanent or temporary loss of indigenous vegetation, and SCC species.				
Impact Rating		Without mitigation		With mitigation (including recommendations for layout 3)	
	Impact Significance	Low	9	Low	7
No go alternative	Baseline conditions will remain the same – negligible impacts on flora due to no clearing and current status quo (secondary vegetation) will remain with potential impacts of AIS growth, cattle grazing and illegal dumping on the site				

FAUNA HABITATS AND FAUNA SPECIES

The project area is fenced and fragmented by two main roads, creating barriers for larger animals. The vegetation of the project area is fairly uniform with limited diversity of faunal habitats.

Activity	Mixed / light industrial				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction				
Aspect	Site layout, site clearing, construction activities -loss of habitat and forage area will be permanent				
Nature of Impact	Direct / indirect / cumulative- Loss of faunal habitats, processes, and SSC				
Description of Impact	Construction activity may result in the loss of habitat for faunal species, which could result in disturbance and displacement of faunal species, impact on faunal processes, loss of faunal SSC				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Low	10	Negative Low	7
No go alternative	Baseline conditions will remain the same – no disturbance to faunal habitats / foraging areas and fauna on site				

ALIEN INVASIVE SPECIES					
Twelve (12) AIS were recorded within the project area. For the purposes of this development, all Category 1b and 2 species listed under NEM:BA and all Category 1 and 2 species listed under CARA need to be removed, and ongoing follow up measures implemented to ensure AIS do not return.					
Activity	Mixed / light industrial				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction / operations				
Aspect	Alien invasive plant species				
Nature of Impact	Direct / indirect and cumulative – Increase in alien invasive vegetation				
Description of Impact	Construction sites often lead to seeding of AIS common to the area because the soils are bare and disturbed and therefore easy for seeds to be lodged. Ongoing AIS is recommended throughout construction and operational phase. Ongoing removal of AIS as soon as detected and keeping open space areas free of AIS can be a positive impact. Ongoing clearing will be particularly important in all the stormwater pond and open space areas; AIS establish and grow quickly in drainage areas.				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium High	17	Negative Low	8
No go alternative	Baseline conditions will remain the same – secondary vegetation and AIS				

FIRE RISK					
Vegetation on site is representative of degraded Garden Route Granite Fynbos (north section) and Hartenbos Dune Thicket. The site and surrounding areas appear to be degraded landscapes due to agricultural activities. Fynbos is a fire driven ecosystem where thicket vegetation is less prone to fire than fynbos because it is more succulent. The majority of the vegetation on site will be cleared, with remaining open space / vegetated areas including the stormwater management pond areas, the steep area which coincides with the WC BSP CBA in the northern sections and the 5 meters between the erf boundary and the development. The National Veld and Forest Fire Act (Act 101 of 1998) specifies the need for landowners to manage fires with suitable fire breaks and clearing of AIS.					
Activity	Mixed / light industrial				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction / operations				
Aspect	Fire risks				
Nature of Impact	Direct				
Description of Impact	Without interventions to prevent / control potential fire outbreaks, damage to surrounding biodiversity and infrastructure could occur				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	**Negative Medium**	**14**	**Negative Low**	**8**
No go alternative	Baseline conditions will remain the same – presence of AIS and high fire risk.				

SOIL
The soils on the northern section of the site are characterised by Prismacutanic and/or pedocutanic diagnostic horizons dominant. With geology characterised by conglomerate, sandstone, siltstone and mudstone of the Enon Formation, Uitenhage Group. The soil erodibility of this portion is considered to be moderate. The soils on the northern section of the site are characterised by Grey regic sands and other soils. With geology characterised by Mainly fixed dunes, dune rock and aeolian sand. The soil erodibility of this portion is considered to be High. Blanket clearing must be avoided to prevent excessive dust, wind and water erosion. Topsoil is to be stockpiled separately. Where large areas are exposed, the site will need to be watered

during windy condition to prevent loss of soil and dust generation.					
Activity	Mixed / light industrial				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction, Operational Phase				
Aspect	Site clearing, general construction activities, bare soil, stockpiling, general maintenance activities				
Nature of Impact	Direct - Loss of soil; damage to soil structure, erosion, dust generation				
Description of Impact	Loss of soil can be caused due to poor management (stockpiling, excavations, vehicle entrainment) resulting in erosion and dust generation.				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium	13	Negative Low	7
No go alternative	Baseline conditions will remain the same – no damage or loss of soil due to no construction disturbances.				

AQUATIC SYSTEMS

The project area falls within the Breede-Gouritz Water management Area, within Primary Catchment K (Kromme) area and in quaternary catchment K10F. The site does not fall within a sub-quaternary catchment (SQC) that has been categorised as a Freshwater Ecosystem Priority Area (FEPA) or a Strategic Water Source Area (SWSA). According to the National Wetland Map 5 (Van Deventer et al. 2018), there are no wetlands within a 500m radius of the site. The NFEPA does indicate the presence of artificial wetlands, confirmed to be farmers dams, with one in the south western section and the other being situated within the northern mapped CBA which will not be developed due to steep terrain. It is recommended that the development moves completely out of the mapped CBA (estimated 2500m2) will require a slight shift in the SDP (alternatives 1 and 2). There are no natural aquatic features that will be impacted by the project. Additionally, the development layout was amended to avoid the two artificial features.

Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction and Operational Phase				
Aspect	Construction activities, operational and maintenance activities				
Nature of Impact	Direct – Disturbance / Loss of aquatic habitat and species				
Description of Impact	Loss of habitat and SCC. No natural wetlands are mapped on the site and the site is not expected to impact on natural wetlands occurring to the east of the site with mitigation in place. The artificial wetland occurring in the northern mapped CBA (WCBSP) should be kept as it currently provides a service to the site and will offer suitable conditions of flora and fauna; this area should not be disturbed during construction or operations. The farmers dam in the east will be retained as a swmp. An additional pond will be added on the western section. is recommended the SWM ponds are design to cater for 1: 100 stormwater events.				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Low	10	Negative Low / Negligible	7
Layout	Alternative SDP and stormwater management plan in bulk services report (Appendix B)				
Phase	Construction and Operational Phase				
Aspect	Construction activities, operational and maintenance activities				
Nature of Impact	Direct - Increase in runoff				
Description of Impact	The moderate gradient and creation of hard surfaces will increase the amount of runoff generated on the site which could result in transportation of sediment / pollutants if runoff is not adequately managed throughout construction and operations.				
Impact Rating		Without mitigation		With mitigation	

	Impact Significance	Negative Medium	16	Negative Low	10
No-go Alternative	Baseline conditions remain				
VISUAL IMPACTS					
Mismanaged construction sites can result in windblown litter, spillages and overflowing waste, all which have a negative visual impact on receptors. Light pollution is of global concern given that our night skies are getting lighter due to urban development and that many animals are specifically adapted to dark night skies for navigation, foraging and behavioural aspects (i.e. sleep, hunting).					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction				
Aspect	Housekeeping				
Nature of Impact	Direct / cumulative – construction				
Description of Impact	Mismanaged construction sites can result in negative visual impact on receptors				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium	14	Negative Low	10
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Operations				
Aspect	Lighting / housekeeping				
Nature of Impact	Direct / Cumulative – light pollution on biodiversity and residents; incorrect housekeeping will lead to visual impacts on receptors				
Description of Impact	Light pollution can lead to disruption of natural and social behaviour.				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium	14	Negative Low	10
No go alternative	Baseline conditions will remain the same – no visual impacts as a result of construction or operational activities				
NOISE IMPACTS					
Noise pollution can disturb wildlife (disrupt mating calls and reduce production rates) and alter behaviour (abandon territories). Noise can be an interference to daily life of local residences. The site is located adjacent to the WWTW in the west, a pub and grill in the east and is traversed by two main roads. Industrial activities north of the site and an open area to the northeast. Noise levels must be kept to a minimum to prevent unnecessary disruptions. No blasting is expected to be required for the site.					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction				
Aspect	Noise generated from construction activities				
Nature of Impact	Direct – Noise impacts				
Description of Impact	Construction noise can be an interference to daily life of local people in the project area				
Impact Rating		Without mitigation		With mitigation	

	Impact Significance	Negative Medium	15	Negative Low	10
No go alternative	Baseline conditions will remain the same – no noise impacts				
GENERAL WASTE AND HAZARDOUS MATERIALS					
Investigations to reduce, reuse and recycle waste generated during the construction and operational phases are recommended.					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction Phase and Operational Phase				
Aspect	General waste				
Nature of Impact	Direct				
Description of Impact	Incorrect waste management can result in impact on natural terrestrial and aquatic systems and biodiversity				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium	15	Negative Low	9
Phase	Planning and Construction and operational Phase				
Aspect	Hazardous materials				
Nature of Impact	Direct				
Description of Impact	Incorrect hazardous waste management can result in pollution of soil; runoff, aquatic systems, fauna and flora				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium	14	Negative Low	10
Phase	Planning, construction, and Operational Phase				
Aspect	Waste management				
Nature of Impact	Cumulative				
Description of Impact	Increasing disposal at landfill and few recycling options - increasing development in the area will place more pressure on the landfill options available.				
Impact Rating		Without mitigation		With mitigation (recycling / reuse options)	
	Impact Significance	Negative Medium - High	16	Negative Medium	14
No go alternative	Baseline conditions will remain the same – no waste generation; site is currently vacant				
SOCIAL IMPACTS					

The site is situated within the Mossel Bay Local Municipality, Garden Route District of the Western Cape Province. The National Development Plan, 2012 identifies ten critical actions for implementation; the following are identified as relevant to the proposed development:

- Social compact to reduce poverty and inequality, and raise employment (the site is considered to be an infill development)
- Interventions to ensure environmental sustainability and resilience to future shocks. (Relevant SDP and SWMP to incorporate recommendations in EMPR)
- New spatial norms and standards – densifying cities, improving transport, locating jobs where people live, upgrading informal settlements and fixing housing market gaps. (Industrial workshop are expected to create local employment opportunities in Groot Brak)

The Western Cape Government has identified priorities as its contributions to the realization of the aims and objectives of the National Development Plan (NDP) over the five-year term; the following are identified as relevant to the proposed development:

- Growth And Jobs
- Empowering People Education And Learning
- Mobility And Spatial Transformation (Industrial workshop are expected to create local employment opportunities in Groot Brak)

Ward-based planning was introduced under the third generation IDP for the MBM as a new dimension towards integrated planning and seeks to deepen public participation in Municipal matters. The population of Mossel Bay is 96 114 people in 2021 making it the second most populated municipal area in the Garden Route District. This is expected to grow to 97 514 by 2025, equating to an average annual growth rate of 0.4 per cent (Western Cape Provincial Treasury SEP, 2021). The annual income for households is divided into three categories, namely the proportion of people that fall within the low, middle- and high -income brackets. Poor households fall under the low-income bracket, which ranges from no income to R38 200 annually (R3 183 per month). Approximately 52,8% of households fall within the low-income bracket, of which 17.4% have no income. A sustained increase in economic growth is needed if the 2030 NDP income target of R110 000 per person, per annum is to be achieved (Stats SA, 2016). Industrial parks are identified in the IDP (2022 – 2027) as one of the LED priorities identified by council and executive mayor

Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)
Phase	Planning, Construction; Operational
Aspect	Construction Phase
Impact	Employment creation and skills development
Nature of Impact	Direct / Indirect
Description of Impact	The proposed development will contribute to the creation of direct employment opportunities and skills development through the creation of construction jobs for local contractors and labourers and suppliers of required services. Indirect employment could be created using various materials required for the construction phase. Permanent employment opportunities positions are likely to be created during operational phase through the workshop areas on site.
Impact Rating	

	Without mitigation		With mitigation	
Impact Significance	Positive Medium	14	Positive Medium	15

No go alternative	Baseline conditions will remain the same – no additional local economic opportunities
Phase	Construction Phase
Aspect	Criminal activities
Nature of Impact	Direct
Description of Impact	Risk of crime has negative social and / or economic consequences - The level of crime in South Africa does not only have a significant impact on the livelihood of citizens but also affects the general economy. Crime hampers economic growth by discouraging investment and capital accumulation. If not addressed decisively, it leads to social and economic disparity. Poor lighting and alien vegetation on the property can lead to use of the site for criminals; measures must be put in place to ensure safety and security during construction and operational phases.
Impact Rating	

	Without mitigation		With mitigation	
Impact Significance	Negative Medium	11	Negative Low	9

Phase	Operational phase
Aspect	Criminal activities
Nature of Impact	Direct

Description of Impact	Criminal activities during operations				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium	11	Negative Low	10
No go alternative	Baseline conditions will remain the same				
TRAFFIC MANAGEMENT					
The site is intersected east-west by Sandhoogte Rd (DR1583) and intersected north-south by Sorgfontein Rd (DR1578); both roads are a low order (class 4) provincial divisional road. No official public transport routes are located close to the proposed development, although minibus taxis do utilize these roads on an unofficial basis. Access to portions 1&4 (eastern sections) of the development is proposed from Sandhoogte Rd at a point approximately 107m east of the intersection with Sorgfontein Rd. Access to portions 2 and 3 (western sections) of the development is proposed from Sandhoogte Rd, at a point approximately 117m west of the intersection with Sorgfontein Rd. Sight distances at both proposed access points are acceptable in both directions in both the horizontal and vertical alignments with the condition that the overgrown bush be trimmed for the complete road reserve width. The traffic impact statement of the proposed development evaluated the three intersections affected by the development. The results of the analysis indicate that the development has a negligible impact on the Level of Service during both the morning and afternoon horizon year 2030 peak hours and the intersection will continue to operate at a Level of Service A for both the morning and afternoon peak hours for all three intersections. he necessity of a right turn lane is not triggered in this analysis for any of the intersections or approaches.					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B) / TIA (Appendix H4)				
Phase	Construction and operations				
Aspect	Personnel vehicles, construction vehicles, deliveries / collections, machinery				
Nature of Impact	Direct				
Description of Impact	Impact on other road users				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Low	10	Negative Low	9
No go alternative	Baseline conditions will remain the same – no additional traffic impact				
ELECTRICITY USE					
The bulk electrical supply will be supplied from the Mossel Bay Municipality's (MBM) Midbrak 11/11kV Substation, via the existing 11kV underground cable. This cable is currently installed along the Sandhoogte Road, between the Grootbrak WWTW's minisub and the Sandhoogte Booster Pump Station. The cable has a current-carrying capacity of 4.75 MVA (@11kV). Furthermore, it has been confirmed with the MBM's Electrical Personnel that this feeder is currently very lightly loaded and does have spare capacity of at least 1 MVA available, which could be utilized for the planned development. The estimated diversified load of the total development, in line with the above design criteria, is estimated to be 613 kVA. For this reason, it is recommended that 630kVA minisub be supplied for development. It is noted that energy saving, and green building design measures are proposed to be incorporated into this development. The final designs are recommended to be reviewed by an EAP / appointed ECO to confirm best practice energy saving measures are incorporated, with a view to keep night lighting to a minimal to reduce visual lighting impacts on the area.					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 and bulk services (Appendix B)				
Phase	Planning and Operational Phase				
Aspect	Electric demand				
Nature of Impact	Direct / cumulative				

Description of Impact	Depleting non-renewable energy resources is a global problem. Energy capacity in South Africa has often failed to meet energy demands. The impact of the development on energy resources is low and the impact can be reduced by putting in relevant measures to reduce the demand on the National Grid.				
Impact Rating		Without mitigation		With mitigation (preferred design)	
	Impact Significance	Negative Medium	16	Negative Medium	12
No go alternative	Baseline conditions will remain the same – negligible impact on energy use; site is currently vacant				
SEWAGE MANAGEMENT					
The Average Dry Weather Flow (ADWF) created by the proposed development, in line with the above discussions, criteria and standards, is calculated at approximately 51kl/day. The design peak flow, inclusive of a specified peak factor of 3.5, as well as extraneous flow, will be calculated during the detail design stage. The Great Brak River WWTW has recently been upgraded and has sufficient capacity to accommodate this development. The internal sewer network for this development is divided into four drainage zones by Sandhoogte Road and Sorgfontein Road: The site has been divided into four drainage zone (A to D); a small section of zone A, designated zone A2, situated on the southern portion of zone A, cannot gravitate to the WWTW and storage units will be developed here with no sewer infrastructure. Sewer from the development will drain to the south-western boundary where it will connect into the main municipal sewer line flowing into the Great Brak River WWTW.					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 and bulk services (Appendix B)				
Phase	Construction and Operational Phase				
Aspect	Sewage treatment and pipelines				
Nature of Impact	Cumulative				
Description of Impact	Cumulative impact on capacity of WWTW and supporting infrastructure. The developer can ensure strict control of what is disposed into the system from the site and ensure all infrastructure on the site is adequately installed and suitably maintained.				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Medium	11	Negative Low / negligible	7
No go alternative	Baseline conditions will remain the same – negligible impact on WWTW as site is currently vacant with no sewage generation				
WATER MANAGEMENT					
The bulk water Average Annual Daily Demand (AADD) for this proposed development has been calculated at approximately 56kl/day. The bulk services report states that bulk water is available for this proposed development. It is recommended to incorporate rainwater tanks into the development due to the large roof area on the site. This can augment water supply required for industrial workshops and can also catch water during rainfall events assisting with alleviating the amount of stormwater generated by the site due to removal of vegetation on approximately 14 ha and replacing this area with hard surfaces.					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 and bulk services (Appendix B)				
Phase	Planning, Construction, operations				
Aspect	Water use				
Nature of Impact	Direct / cumulative				
Description of Impact	Careful management of water use should result in a low to negligible impact on water availability				
Impact Rating		Without mitigation		With mitigation	

	Impact Significance	Negative Medium	13	Negative Low	9
No go alternative	Baseline conditions will remain the same – no impact – no sewage generation form the site.				
CHANGE IN LAND USE					
The site is currently vacant and was previously used for crop farming. The site has been vacant since 2014. The site is considered to be an infill development as development will take place on a site between existing developed portions and therefore bulk municipal services are already in place in close proximity to the site. Infill developments considered to be a positive economic benefit to the local municipality due to additional rates and taxes being generated without the burden of additional capital outlay which is expected to strengthen the financial sustainability of the municipality in both the short- and longer term. The change In landuse from agricultural 1 (currently vacant and not used for agricultural activities) to mixed / light industrial is considered to have a positive socio-economic impact on the local area. The site is also a degraded site adjacent to WWTW and south of the industrial development and therefore a preferred site for the development. The northern mapped CBA is recommended to be kept out of the development footprint and the artificial pond retains for stormwater management form the road. The SWM ponds should be designed to accommodate 1:100 storm water events.					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Planning, Construction, operations				
Aspect	Change in land use of the site in question is considered to be an overall positive impact of low significance to the area.				
Nature of Impact	Direct / indirect				
Description of Impact	Change in land use of the site in question is considered to be an overall positive impact of low significance to the area.				
Impact Rating	Impact Significance	Positive Low	10		
No go alternative	Baseline conditions will remain the same – positive impacts will not occur as result of the proposed development				

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Appendix I: Environmental Management Programme

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Appendix K: Certified copy of Identity Document of Applicant

Appendix L: Certified copy of the title deed (or title deeds in the case of linear activities)

Appendix M: DFFE Screening Tool Report

Western Cape Government
Environmental Affairs and Development Planning

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NEMA SECTION 24G APPLICATION COMPLETENESS CHECKLIST

IMPORTANT: Kindly ensure that this checklist is completed and attached to the NEMA SECTION 24G Application.

Please indicate by ticking the following below to serve as confirmation that the required information has been included in the application.

No.	Application Requirements	Please tick for confirmation
1.	Requirements of Preliminary Advertisement (pre-application public participation requirements including register of all I&APs), in accordance with Annexure A, Section D of the Section 24G Fine Regulations. **(Note: Failure to meet the Regulation 8 will result in rejection of the application)**	✓
2.	Application form has been completed and attached, which includes among others:	✓
	2.1. A list of all listed activities and/or waste management activities that was triggered when the development activity was commenced with.	✓
	2.2. A list of all **similarly listed** activities in terms of the current EIA regulations (if applicable).	✓
	2.3. A description of the receiving environment **before** commences of the activity(ies).	✓
	2.4. A description of the receiving environment **after** commences of the activity(ies).	✓
	2.5. All appendices and annexures:	✓
	2.5.1. Locality map	✓
	2.5.2. Site plans or/and Layout plan	✓
	2.5.3. Building plans (if applicable)	✓
	2.5.4. Colour photographs	✓
	2.5.5. Biodiversity overlay map	✓
	2.5.6. Permit(s) / license(s) from any other organ of state including service letters from the municipality	✓
	2.5.7. Public participation information: including a copy of the register of interested and affected parties, the comments and responses report, proof of notices, advertisements, Land owner consent and any other public participation information	✓
	2.5.8. Environmental Management Programme	✓
	2.5.9. Certified copy of Identity Document of Applicant	✓
	2.5.10. Certified copy of the title deed (or title deeds in the case of linear activities)	✓
	2.6. Signed declaration forms.	✓
3.	Are any specialist assessments required: e.g. Botanical, Hydro-geological, soil, socio-economic?	**Y**
	3.1. If yes, has the specialist assessment report been attached to the application?	✓
4.	An assessment of the impacts of the activity or activities in terms of the following categories:	✓
	• Socio-economic	✓
	• Biodiversity	✓
	• Sense of place &/or Heritage/ Cultural	✓
	• Any pollution or environmental degradation which has been, is being, is being or may be caused	✓
5.	A methodology of how the investigation into the impacts associated with the unlawful activity was undertaken.	✓

6.	Completed and attached representations of Annexure A, Section A (Directives) in terms of the S24G Fine Regulations: Information/ Representation submitted in terms of any Directives the Minister/ decision maker may issue in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA) s24G(1)(b)(i)-(viii).	✓
7.	Completed and attached representations in terms of Annexure A, Section B (Deferral) of the S24G Fine Regulations.	✓
8.	Completed and attached representations in terms of Annexure A, Section C, Part 1 (Fine Quantum based on the assessment as specified above (4).	✓
	Confirmation that Annexure A, Section C, Part 1 has been completed by an environmental assessment practitioner (EAP)	✓
9.	Compliance history of the applicant:	✓
	9.1. Completed Annexure A, Section C, Part 2 and 3; namely:	✓
	9.1.1. Whether or not administrative enforcement notices, including pre -notices where appropriate, have previously been issued to the applicant in respect of a contravention of section 24F(1) of the NEMA and/or section 20(b) of the National Environmental Management: Waste Act (Act 59 of 2008) (NEM: WA).	✓
	9.1.2. Whether or not the applicant has previously been convicted in respect of a contravention of section 24F(1) of the Act and /or section 20(b) of the NEM: WA;	✓
	9.1.3. Whether or not the applicant has previously submitted a section 24G application in respect of an activity or activities which commenced prior to the activity or activities that are the subject of the current application; and	✓
	9.1.4. Whether the applicant is a firm or a natural person. (see Section 24G Fine Regulations for definition of "firm")	✓
	9.2. Provided information or whether or not any of the directors of the applicant firm are, or were, at the relevant time, directors of a firm to whom the above (9.1.1. - 9.1.3.) applies;	✓
	9.3. Advise on whether an applicant who is a natural person is, or was, at the relevant time a director of a firm to whom the above (9.1.1.- 9.1.3.) may apply.	✓
10.	Consultation with relevant State departments in terms of section 24O(2) & 24O(3) of the NEMA.	✓
	10.1 Proof of Consultation with relevant State departments, including, *inter alia*, notices, adverts etc.	✓
	10.2 Copies of comments and responses included in the application.	✓
	10.2 Comments and Response report attached to the application.	✓
11.	Public Participation Process undertaken in terms of Chapter 6 of the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations, 2014") *(GN No. R.326 of 7 April 2017)* **(if conducted/undertaken)**	✓

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Environmental Affairs and Development Planning

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Section 24G Application Form for the consequences of unlawful commencement of listed activity/ies in terms of the:

- **National Environmental Management Act, 1998 (Act No. 107 of 1998), ("NEMA");**

April 2018

Kindly note that:

1. This application must be submitted where a person has commenced with a listed or specified activity without an environmental authorisation in contravention of section 24F(1) of NEMA (i.e. where the person commenced with an activity listed or specified in terms of section 24(2) (a) or (b) of NEMA - the activities contained in the EIA Listing Notices) or has commenced, undertaken or conducted a waste management activity without a waste management licence in terms of section 20 (b) of the NEM:WA.

2. This **Application Form** must be completed for all section 24G applications, by an independent Environmental Assessment Practitioner ("EAP").

3. This Application Form is current as of 01 April 2018. It is the responsibility of the Applicant/EAP to ascertain whether subsequent versions of the Application Form have been published or produced by the competent authority. Note that this Application Form replaces all the previous versions. This updated Application Form must be used for all new applications submitted from 01 April 2018.

4. **<u>The contents of this Application Form includes the following:</u>**

   PART 1 -
   Section A: Background Information
   Section B: Activity Information
   Section C: Description of Receiving Environment
   Section D: Need and Desirability
   Section E: Alternatives
   Section F: Impact Assessment, Management, Mitigation and Monitoring Measures
   Section G: Assessment Methodologies and Criteria, Gaps in Knowledge, underlying Assumptions and Uncertainties
   Section H: Recommendations of the EAP
   Section I: Representations - Response to an Incident or Emergency Situation
   Section J: Public Participation Process

   PART 2 –
   ANNEXURE A of Fine Regulations
   Section A: Directives
   Section B: Deferral of the Application
   Section C: Quantum of the section 24G fine
   Section D: Preliminary advertisement

   PART 3 –
   Appendices and Declarations

   PART 4 –
   ANNEXURE B: Waste Management Activity Supporting Information (if relevant)

5. An independent EAP must be appointed to complete the required sections (in terms of NEMA and its Regulations) of the Application Form on behalf of the applicant; the declaration of independence must be completed by the

independent EAP and submitted with this Application Form. If a specialist report is required, the specialist will also be required to complete the declaration of independence.

6. Two hard copies (including the original) and one electronic copy (CD/DVD/Flash drive) of this application form must be submitted.

7. The required information must be typed within the spaces provided. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. The space provided extend as each space is filled with typing. **A legible font type and size must be used when completing the form.** A digital copy of the Application Form is available on the Department's website https://www.westerncape.gov.za/eadp/

8. The use of "not applicable" in the Application Form must be done with circumspection.

9. **No faxed or e-mailed application forms will be accepted.**

10. Unless protected by law, all information contained in and attached to this application will become public information on receipt by the competent authority. Please note that, unless exemption has been granted in terms of the National Exemption Regulations published under GN R994 in GG 38303 of 8 December 2014, any Interested and Affected Party should be provided with the information contained in and attached to this Application Form as well as any subsequent information submitted.

11. This Application Form must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department.

PROCESS TO BE FOLLOWED:

a) **Prior to submission of an Application Form,** the applicant is required to undertake a pre-application public participation process in terms of Regulation 8 of the Regulations relating to the procedure to be followed and criteria to be considered when determining an appropriate fine in terms of section 24G published in the Government Gazette on 20 July 2017, Gazette No 40994, No. R. 698 ("Section 24G Fine Regulations").

b) Together with the submission of a section 24G Application Form, the form **must include Proof of compliance of with Regulation 8** of the Section 24G Fine Regulations, including, but not limited to, proof of the pre-application advertisement in a local newspaper and register of I&APs.

c) The Department will acknowledge receipt of the application (within 14 days) and provide the Applicant / EAP with the relevant application reference number to be used in all future correspondence and the application public participation processes.

d) Upon receipt of the application, the MEC/Competent Authority may direct the applicant in terms of section 24G(1)(i-viii) of the NEMA.

e) In terms of the provisions of section 24G of NEMA, the applicant must pay an administrative fine up to a maximum of R5 million before the MEC/Competent Authority decides on the application.

f) The applicant **must within 14 days** of receipt of the determination of the quantum of the fine, ensure that all registered interested and affected parties are notified of the determination of the quantum of the fine, including the reasons and provided with access to the determination.

g) The administrative fine **must be paid within the time period stipulated** in the determination. Failure to pay the fine within the specified period, will result in the lapse of the application and any partial amounts paid in will not be refunded.

h) **Proof of payment of the fine must be submitted to the Department**. Upon payment of the administrative fine, the MEC/Competent Authority may-

- refuse to issue an environmental authorisation; or
- issue an environmental authorisation to such person to continue, conduct or undertake the activity subject to such conditions as may be deemed necessary, which environmental authorisation shall only take effect from the date on which it has been issued; or

- direct the applicant to provide further information or take further steps prior to making a decision provided for above;
- together with the above decision the MEC/Competent Authority may direct a person to rehabilitate the environment within such time and subject to such conditions as may deem necessary or take any other steps necessary under the circumstances.

PLEASE NOTE THE FOLLOWING:

1. Failure to comply with a directive may result in the institution of appropriate legal action as is deemed necessary and as provided for in the legislation.

2. The submission of an application or the granting of an environmental authorisation shall in no way derogate from—
   (a) the environmental management inspector's or the South African Police Services' authority to investigate any transgression in terms of NEMA or any specific environmental management Act;
   (b) the National Prosecuting Authority's legal authority to institute any criminal prosecution.

3. If, at any stage after the submission of an application it comes to the attention of the Minister, Minister for mineral resources or MEC that the applicant is under criminal investigation for the contravention of or failure to comply with section 24F(1) or section 20(b) of the *National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)*, the Minister, Minister for mineral resources or MEC may defer a decision to issue an environmental authorisation until such time that the investigation is concluded and—
   (a) the National Prosecuting Authority has decided not to institute prosecution in respect of such contravention or failure;
   (b) the applicant concerned is acquitted or found not guilty after prosecution in respect of such contravention or failure has been instituted; or
   (c) the applicant concerned has been convicted by a court of law of an offence in respect of such contravention or failure and the applicant has in respect of the conviction exhausted all the recognised legal proceedings pertaining to appeal or review.

4. A person is guilty of an offence if that person:

   - Prior to submission of a section 24G application:
     - fails, in terms of Regulation 8(1), to place a preliminary advertisement in a local newspaper in circulation in the area in which the activity was, or activities were, commenced and on the applicant's website, if any or
     - fails, in terms of Regulation 8(2), to comply with the advertisement requirements set out in Annexure A, section D or
     - fails, in terms of Regulation 8(3), to open and maintain a register of interested and affected parties)); or
     - fails, in terms of Regulation 8(4), to attach to the application form the register of interested and affected parties, which must be included in the report, or form part of the information submitted in terms of section 24G(1) of NEMA.

   - Provides incorrect, false or misleading information in any form, including in any document submitted to a competent authority in terms of the Section 24G Fine Regulations or omits information that may have an influence on the outcome of a recommendation of the fine committee or determination of the competent authority.

5. A person convicted of an offence in terms of these Regulations is liable to a fine not exceeding R5 million or to imprisonment for a period not exceeding 5 years, and in the case of a second or subsequent conviction to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, and in both instances to both such fine and such imprisonment.

DEPARTMENTAL DETAILS

Department of Environmental Affairs and Development Planning,
Directorate: Environmental Governance
Attention: Sub-directorate: Rectification
Private Bag X9086
Cape Town, 8000

Registry Office
1st Floor Utilitas Building
1 Dorp Street, Cape Town

Queries should be directed to the Sub-directorate: Rectification at:
Tel: (021) 483-5827 Fax: (021) 483-4033

DEPARTMENTAL REFERENCE NUMBER(S) (for official use)

File Reference number (S24G)	
Administrative Fine Reference	

DEPARTMENTAL REFERENCE NUMBER(S) (to be completed by the EAP)

File Reference number (Enforcement), if applicable	
File reference number (EIA), if applicable:	
File reference number (Waste), if applicable:	
File reference number (Other (specify)):	

View the Department's website on http://www.westerncape.gov.za/eadp for the latest version of the documents

PART 1

PROJECT TITLE

Proposed mixed use / light industrial development on RE/ 139 Farm Zandhoogte Mossel Bay District Municipality
24G Reference: 14/1/1/E3/9/2/3/L1270/22

RELEVANT REGION IN WHICH THE ACTIVITY COMMENCED

Cross out the appropriate box "☒" in which region the unlawful activity/ies has commenced.

REGION 1 City of Cape Town and West Coast District	REGION 2 Cape Winelands District and Overberg District	REGION 3 Central Karoo District and Eden District
		✓

SECTION A: BACKGROUND INFORMATION

1. APPLICANT PROFILE INDEX

Cross out the appropriate box "☒".

1.1	The applicant is a Natural Person (individual)					
1.2	The applicant is a Firm (i.e. any body incorporated by, or established in terms of, any law as well as any partnership, trust, parastatal or organ of state)					✓
1.2.1	If a firm, please tick the relevant box below:					
	Body Corporate	Partnership	Trust	Parastatal	Organ of State	
	Directors of a	Members of a	Other, please	Sapphire Ocean Investments (RF) (Pty) Ltd		

	Company	Board	specify	

Applicant's details (duplicate this section where there is more than one applicant)	Mr Erno Janse van Rensburg		
Applicant Name:	Mr Erno Janse van Rensburg		
RSA Identity Number/ Passport Number of Applicant, if natural person:	PLEASE INSERT		
Name of Firm (if applicable):	Sapphire Ocean Investments (RF) (Pty) Ltd		
Firm Registration Number:	2005/013637/07		
Contact Person at the Firm:	Mr Erno Janse van Rensburg		
List of all (as applicable at the relevant time):	Please insert the names and RSA ID numbers of the relevant persons below –		
● Directors of a company; or ● Members of the board; or ● Executive committee or other managing body of a corporate body or parastatal; or ● **Members of close corporation; or** ● Partners of a partnership; or ● Trustees of a trust	Mr Erno Janse van Rensburg RSA ID No. .		
Postal address:	Krugerlaan Plot 14		
	Lyttelton, Centurion	Postal code:	
Telephone:		Cell:	
E-mail:	Ernoj@alsgroup.co.za	Fax:	( )
Project Consultant	Eco Route		
Contact person:	Janet Eberson		
Postal address:	P.O. Box 1252		
	Sedgefield	Postal code:	6573
Telephone:	+27(0) 846074743 / +27(0) 825577122	Cell:	+27(0) 846074743 / +27(0) 825577122
E-mail:	claire@ecoroute.co.za / janet@ecoroute.co.za	Fax:	( )
Name of the Environmental Assessment Practitioner ("EAP") responsible for the application:	Claire De Jongh		
Company name (if any):	Independent; Sub consultant – Eco Route		
Postal address:	P.O. Box 1252		
	Sedgefield	Postal code:	6573
Telephone:	+27(0) 846074743	Cell:	+27(0) 846074743
E-mail:	claire@ecoroute.co.za /	Fax:	( )

EAP Qualifications	BSc Environmental Management: Zoology Stream BSC Hons Environmental Monitoring and modelling		
EAP Registrations/Associations	EAPSA 2021/3519		
Name of the Landowner:	Sapphire Ocean Investments (RF) (Pty) Ltd		
Name of the contact person for the land owner (if other):	Mr Erno Janse van Rensburg		
Postal address:	Krugerlaan Plot 14		
	Lyttelton, Centurion	Postal code:	
Telephone:		Cell:	
E-mail:	Ernoj@alsgroup.co.za	Fax:	( )
Person in control of land:	Sapphire Ocean Investments (RF) (Pty) Ltd		
Contact person:	Mr Erno Janse van Rensburg		
Postal address:	Krugerlaan Plot 14		
	Lyttelton, Centurion	Postal code:	
Telephone:		Cell:	
E-mail:	Ernoj@alsgroup.co.za	Fax:	

Please note:

In instances where there is more than one landowner, please attach a list of landowners with their contact details to the back of this form.

A certified copy of the applicant's (if natural person), alternatively a director's (as defined), Identity Document must be attached to the application.

A certified copy of the title deed of the property/s on which the unlawful listed activity/ies has commenced must be attached to the application.

Municipality in whose area of jurisdiction the activity falls:	Mossel Bay Municipality		
Contact person, if known:	Carel Venter Director Planning & Economic Development		
Postal address:	Private Bag X29,		
	Mossel Bay,	Postal code:	6500
Telephone	044 606 5000	Cell:	
E-mail:	cventer@mosselbay.gov.za	Fax:	044 606 5062

Please note:

In instances where there is more than one Municipality involved, please attach a list of Municipalities with their respective contact details to the form.

Property location(s):	RE/ 139 Farm Zandhoogte, north of N2, Tergniet, Mossel Bay Municipality
	RE/ 139 of Farm Zandhoogte
Farm/Erf name(s) & number(s) including portion(s)	18.44 ha
Property size(s) (m^2)	In 2020 approximately 2.5 ha of RE/ 139 was cleared without environmental authorisation by the previous landowner (Ideal Trading cc). **Note:** Compliance notice was issued by DEADP in October 2022. Clearing activities ceased and the cleared footprint has revegetated itself over the past 4

	years (represented by secondary shrubland). The applicant proposes to rectify the illegal commencement of clearing which require an environmental authorisation of activities included in Listing Notice 1 and 3 of the 2014 Environmental Impact Assessment (EIA) Regulations published in terms of National Environmental Management Act (Act 107 of 1998) (NEMA) (as amended, 2017). The applicant proposes to establish mixed/light industrial development on RE / 139; the development footprint (alternative 1) is planned across the entire site (i.e. 18.4 ha) The application is therefore for the clearance of approximately 18 ha vegetation.
Development footprint size(s) (m^2)	18 ha
SG21 Digit code(s)	**C05100000000013900000**

The co-ordinates for the site boundary are:

Property boundary (Re/ 139 Zandhoogte)

Point	Latitude (S)	Longitude (E)
A	34° 3'18.57"S	22°11'14.88"E
B	34° 3'19.74"S	22°11'27.11"E
C	34° 3'37.58"S	22°11'28.88"E
D	34° 3'39.48"S	22°11'18.45"E

Area cleared in 2020

Point	Latitude (S)	Longitude (E)
1. A	34° 3'34.55"S	22°11'24.10"E
2. B	34° 3'34.14"S	22°11'29.21"E
3. C	34° 3'37.58"S	22°11'28.88"E
4. D	34° 3'38.72"S	22°11'22.66"E

*Figure 2: Points of site showing corners of **RE/ 139** Farm Zandhoogte and cleared activities (Google Earth, 2020)*

Please note:

Where numerous properties/sites are involved (e.g. linear activities), attach a list of property descriptions and street addresses to the consultation form.

Street address:	RE/ 139 Farm Zandhoogte, north of N2, Tergniet, Mossel Bay Municipality		
Magisterial District or Town:	Mossel Bay		
Closest City/Town:	Tergniet	Distance	500 meters
Zoning of Property:	Agricultural 1		

Please note:

In instances where there is more than one zoning applicable, please attach ~~a list or~~ map of the properties indicating their respective zoning to the Application Form.

Was the property rezoned after commencement of activities?	YES	**NO**
If yes, what was the previous zoning?		
NA – Zoned Agriculture		
Is a rezoning application required?	**YES**	NO
Is a consent use application required?	YES	**NO**
Locality map:	A locality map must be attached to the Application Form as an appendix. The scale of the locality map must be at least 1:50 000. For linear activities of more than 25 kilometres, a smaller scale e.g. 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow;	

	• a legend; • the prevailing wind direction; and • GPS co-ordinates (Indicate the position of the proposed activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates should be in degrees and decimal minutes. The minutes should have at least three decimals to ensure adequate accuracy. The projection that must be used in all cases is the WGS-84 spheroid in a national or local projection)
Landowner(s) Consent:	If the applicant is not the owner or person in control of the land on which the activity has been undertaken, he/she must obtain written consent from all landowners or persons in control of the land (of the site and all alternative sites). This must be attached to this document as Appendix G. Such consent must indicate whether or not the owner or person in control of the land would support approval of the application and that the land need not be rehabilitated. **Note:** The consent of the landowner or person in control of the land is not required for: a) linear activities; b) an activity directly related to prospecting or exploration of a mineral and petroleum resource or extraction and primary processing of a mineral resource; or c) strategic integrated projects ("SIPs") as contemplated in the *Infrastructure Development Act, 2014 (Act No. 23 of 2014*).

2. APPLICATION HISTORY

(Cross out the appropriate box "☒" and provide a description where required).

Has any national, provincial or local authority considered any development applications on the property previously?	**Yes**	No
If so, please give a brief description of the type and/or nature of the application/s as well as a reference number, if applicable: (In instances where there was more than one application, please attach a list of these applications)		
A rehabilitation planned was compiled by Cape EAPrac on behalf of Ideal Trading 301 CC in November 2022 and acceptance of the plan by DEADP was received in February 2023. (DEADP Ref No: 14/1/1/E3/9/2/3/L1270/22) **An application for environmental authorisation for activities listed in the NEMA 2014 EIA Regulations (as amended, 2017) is being submitted to rectify commencement without environmental authorisation and to continue with the proposed mixed / light industrial development.**		
Which authority considered the application:		
Western Cape Department of Environmental Affairs and Development Planning Harriet van Schalkwyk		
Has any one of the previous application/s on the property been approved **or** refused? If so provide a list of the successful and unsuccessful application/s and the reasons for decision(s).	Yes	No
On 31 October 2022, the Provincial Department of Environmental Affairs & Development Planning (DEA&DP) issued a Pre-Compliance Notice to Ideal Trading 301 cc informing that the activities undertaken to develop a brickworks, are deemed to be unauthorised since vegetation was removed and material was excavated/moved without prior Environmental Authorisation; an option to either apply for retrospective authorisation through means of a Section 24G process, or to restore and rehabilitate the area to its natural condition were provided. Ideal trading opted to restore and rehabilitate the affected area. The rehabilitation plan was accepted ion 7 February 2023. A terrestrial biodiversity assessment carried out in May 2024 on behalf of new landowner (Sapphire Ocean Investments (RF) (Pty) Ltd); the disturbed area has revegetated over the past 4 years; area prior to disturbance was an already transformed area (i.e., agricultural) and 300m2 of indigenous vegetation is not deemed to have occurred due to the already transformed nature of the site; agricultural activities ceased in 2014 and clearing took place six years later. Definition of indigenous is vegetation not disturbed for ten years. The clearing activities took place by Ideal Trading; activities ceased in 2020 and a rehabilitation plan and application was made on behalf of Ideal Trading. The rehabilitation plan was accepted by DEADP. The new landowner acquired the land in 2023 and is proposing to develop a mixed use / light industrial		

development on the property.
Provide detail on the period of validity of decision and expiry dates of the above applications/ permits etc.
On 31 October 2022, the Provincial Department of Environmental Affairs & Development Planning (DEA&DP) issued a Pre-Compliance Notice to Ideal Trading 301 cc informing that the activities undertaken to develop a brickworks, are deemed to be unauthorised since vegetation was removed and material was excavated/moved without prior Environmental Authorisation; an option to either apply for retrospective authorisation through means of a Section 24G process, or to restore and rehabilitate the area to its natural condition were provided. Ideal trading opted to restore and rehabilitate the affected area. The rehabilitation plan was accepted ion 7 February 2023. A terrestrial biodiversity assessment carried out in May 2024 on behalf of new landowner (Sapphire Ocean Investments (RF) (Pty) Ltd); the disturbed area has revegetated over the past 4 years; area prior to disturbance was an already transformed area (i.e., agricultural) and 300m2 of indigenous vegetation is not deemed to have occurred due to the already transformed nature of the site; agricultural activities ceased in 2014 and clearing took place six years later. Definition of indigenous is vegetation not disturbed for ten years. The clearing activities took place by Ideal Trading; activities ceased in 2020 and a rehabilitation plan and application was made on behalf of Ideal Trading. The rehabilitation plan was accepted by DEADP. The new landowner acquired the land in 2023 and is proposing to develop a mixed use / light industrial development on the property.

SECTION B: ACTIVITY INFORMATION

1. ACTIVITIES APPLIED FOR

I hereby apply in terms of section 24G of the National Environmental Management Act (Act 107 of 1998) for the regularisation of the unlawful commencement or continuation of the listed or waste management activities as specified in Section B:1 below.

Applicant (Full names): _____ **Signature:** _____

Place: _____ **Date:** _____

EAP (Full names): _____ **Signature:** _____

Place: _____ **Date:** _____

TO BE COMPLETED UPON SUBMISSION OF FINAL

All listed activities associated with the development must be indicated below.

1.1 Applicable EIA listed activities

ECA EIA Contraventions: between 08 September 1997 and end of 09 May 2002			
Activities commenced with on or after 08 September 1997 and before end 09 May 2002: EIA regulations promulgated in terms of the ECA, Act 73 of 1989			
Government Notice No. ("GN") R1182 Activity No(s):	Describe the relevant listed activity/ies in writing as per GN No. 1182 of 1997	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity

ECA EIA Contraventions: between 10 May 2002 and end of 02 July 2006			
Activities unlawfully commenced with on or after 10 May 2002 and before end 02 July 2006: EIA regulations promulgated in terms of the ECA, Act 73 of 1989,			
NEMA EIA Contraventions: between 03 July 2006 and end of 01 August 2010			
Activities unlawfully commenced with on or after 03 July 2006 and before end 01 August 2010: EIA regulations promulgated in terms of the NEMA			
GN R386 Activity No(s): **(Listing Notice 1 of 2006)**	Describe the relevant listed activity/ies in writing as per GN No. R. 386 of 2006 ("NEMA 2006 Basic Assessment listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
Government Notice No. R387 Activity No(s): **(Listing Notice 2 of 2006)**	Describe the relevant listed activity/ies in writing as per GN No. R. 387 of 2006 ("NEMA 2006 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
NEMA EIA Contraventions: between 02 August 2010 and end of 07 December 2014			
Activities unlawfully commenced with on or after 02 August 2010 and before end 07 December 2014: EIA regulations promulgated in terms of the NEMA, Act 107 of 1998,			
GN No. R. 544 Activity No(s): **(Listing Notice 1 of 2010)**	Describe the relevant listed activity(ies) in writing as per GN No. R. 544 of 2010 ("NEMA 2010 Basic Assessment listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
GN No. R. 545 Activity No(s): **(Listing Notice 2 of 2010)**	Describe the relevant listed activity/ies in writing as per GN No. R. 545 of 2010. (NEMA 2010 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
GN No. R. 546 Activity No(s): **(Listing Notice 3 of 2010)**	Describe the relevant listed Activity(ies) in writing as per GN No. R. 546 of 2010	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity

NEMA EIA Contraventions: on or after 08 December 2014			
Activities unlawfully commenced with on or after 08 December 2014: EIA regulations promulgated in terms of the NEMA, Act 107 of 1998,			
GN No. R. 327 Activity No(s): (Listing Notice 1 of 2014)	**Describe the relevant listed activity(ies) in writing as per GN No. R.327 of 2014 ("NEMA 2014 Basic Assessment listed activity/ies")**	**Describe the portion of the development as per the project description that relates to the applicable listed activity.**	**State the date of commencement of each activity**
Activity 12	The development of— (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs— (a) within a watercourse; (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; — excluding— (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such development occurs within an urban area;	Two artificial watercourses occur on site; natural wetland occurs outside site boundary on south east. Ponds will be retained as part of SW management on the site. Warehouses, storage and access roads will be developed within 32 meters of these ponds. Site is mapped as falling within urban edge; however the surrounding area is not yet built up and site zoned as agricultural 1 area. **Activity 14, LN3 is included for authorisation.**	2020
Activity 27	The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. the undertaking of a linear activity; or ii. maintenance purposed undertaken in accordance with a maintenance management plan.	The site was farmed until approximately 2014. Demolition of two buildings occurred in 2015. Site clearance commenced in 2020 where approximately 2.5 ha vegetation was cleared. Clearing activities have ceased and some of the cleared area has revegetated over the past four years. The proposed development entails the development of 183 storage units and 40 light industrial workshops. The development site is approximately 18.5 ha.	2020
Activity 28	Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development:	SDF 2018 – property fell outside urban area; SDF 2022 – property falls within urban area. Site currently zoned as agricultural 1. Site was farmed until approximately 2014, Proposed development includes a proposed mixed / light industrial development	2020

	(i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.	and subsequent rezoning to light industrial.	
67	Phased activities for all activities—where any phase of the activity was below a threshold but where a combination of the phases, including expansions or extensions, will exceed a specified threshold.	Clearing commenced in 2020 by Ideal trading. Furtherance of clearing for development of storage and warehouses required to facilitate proposal.	2020
GN No. R. 325 Activity No(s): (Listing Notice 2 of 2014)	Describe the relevant listed activity(ies) in writing as per GN No. R.325 of 2014 ("NEMA 2014 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
GN No. R. 324 Activity No(s): (Listing Notice 3 of 2014)	**Describe the relevant listed activity(ies) in writing as per GN No. R.324 of 2014**	**Describe the portion of the development as per the project description that relates to the applicable listed activity.**	**State the date of commencement of each activity**
Activity 12	The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the	In terms of the National Vegetation Map, 2024, Hartenbos Dune Thicke (Ecosystem Status, 2022: *Endangered*) and Garden Route Granite Fynbos (*Critically Endangered*) is mapped on the site. The 2.5 ha cleared area in the south east is mapped as Hartenbos Dune Thicket (NatVeg Map, 2024) In terms of the Western cape biodiversity Plan, 2023 (WCBSP), Terrestrial critical biodiversity area (CBA) and Ecological support areas are mapped in sections on the property. The site is not situated within an aquatic CBA or ESA (WC BSP)	2020

	development setback line on erven in urban areas; iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.		
Activity 14	The development of—(ii) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs— (a) within a watercourse; (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse; **i. Western Cape** i. Outside urban areas: (dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;	In terms of the Western cape biodiversity Plan, 2023 (WCBSP), Terrestrial critical biodiversity area (CBA) and Ecological support areas are mapped in sections on the property. The site is not situated within an aquatic CBA or ESA (WC BSP) Two artificial watercourses occur on site; natural wetland occurs outside site boundary on south east. Ponds will be retained as part of SW management on the site. Warehouses, storage and access roads will be developed within 32 meters of these ponds. Site is mapped as falling within urban edge; however the surrounding area is not yet built up and site zoned as agricultural 1 area. Activity 14, LN3 is included for authorisation.	2020
26	Phased activities for all activities—i. listed in this Notice and as it applies to a specific geographical area, which commenced on or after the effective date of this Notice; or	Clearing commenced in 2020 by Ideal trading. Furtherance of clearing for development of storage and warehouses required to facilitate proposal.	2020

Please ensure that you have provided the similarly listed activities if the listed activities were commenced before the period the EIA Regulations came into effect, i.e. before 08 December 2014.

1.2 Applicable Waste Management Activities

List the relevant waste management activity/ies applied for:

Waste Management Activity Contraventions: On or after 03 July 2007 up to end of 28 November 2013			
Activities unlawfully commenced with in terms of GNR 718 of 03 July 2009 under the National Environmental Management Waste Act, Act 59 of 2008			
GN No. 718 – Category A Activity No(s):	Describe the relevant Category A waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity
GN No. 718 – Category B Activity No(s):	Describe the relevant Category B waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity

Waste Management Activity Contraventions: On or after 29 November 2013			
Activities unlawfully commenced with in terms of GNR 921 of 29 November 2013 under the National Environmental Management Waste Act, Act 59 of 2008,			
GN No. 921 - Category A Activity No(s):	Describe the relevant Category A waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity
GN No. 921 – Category B Activity No(s):	Describe the relevant Category B waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity

Please note:

The National Department of Environmental Affairs is the competent authority for activities regarded as hazardous waste. Such activities must be indicated as hazardous waste in the abovementioned lists.

Only those activities listed above shall be considered for authorisation. The onus is on the applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, an application for amendment or a new application for Environmental Authorisation will have to be submitted.

1.3 Activities listed similarly in terms of the EIA Regulations

Kindly indicate the listed activities in terms of the EIA Regulations that is listed similar to the unlawfully commenced activities. The descriptions provided below must clearly state why the activity/development is still similarly listed in terms of the EIA Regulations, 2014.

The similarly listed activities in terms of the EIA Regulations promulgated in terms of the NEMA, Act 107 of 1998,		
GN No. R. 327 Activity No(s): (Listing Notice 1 of 2014)	**Describe the relevant listed activity(ies) in writing as per GN No. R.327 of 2014 ("NEMA 2014 Basic Assessment listed activity/ies")**	**Describe the portion of the development as per the project description that relates to the applicable listed activity.**
Activity 12	The development of— (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs— (a) within a watercourse; (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; — excluding—	Two artificial watercourses occur on site; these will be retained as part of SW management on the site. Warehouses, storage and access roads will be developed within 32 meter of these ponds. Site is mapped as falling within urban edge, however the surrounding area is not yet built up and site zoned as agricultural 1 area. Activity 14, LN3 is included for

	(cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such development occurs within an urban area;	authorisation.
Activity 27	The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. the undertaking of a linear activity; or ii. maintenance purposed undertaken in accordance with a maintenance management plan.	The site was farmed until approximately 2014. Demolition of two buildings occurred in 2015. Site clearance commenced in 2020 where approximately 2.5 ha vegetation was cleared. Clearing activities have ceased and some of the cleared area has revegetated over the past four years. The proposed development entails the development of 183 storage units and 40 light industrial workshops. The development site is approximately 18.5 ha.
Activity 28	Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.	SDF 2018 – property fell outside urban area; SDF 2022 – property falls within urban area. Site currently zoned as agricultural 1. Site was farmed until approximately 2014, Proposed development includes a proposed of 183 storage units and 40 light industrial workshops. Rezoning to mixed / light industrial is proposed.
Activity 67	Phased activities for all activities—where any phase of the activity was below a threshold but where a combination of the phases, including expansions or extensions, will exceed a specified threshold.	Clearing commenced in 2020 by Ideal trading. Furtherance of clearing for development of storage and warehouses required to facilitate proposal.
GN No. R. 325 Activity No(s): **(Listing Notice 2 of 2014)**	Describe the relevant listed activity(ies) in writing as per GN No. R.325 of 2014 ("NEMA 2014 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.
GN No. R. 324 Activity No(s): **(Listing Notice 3 of 2014)**	Describe the relevant listed activity(ies) in writing as per GN No. R.324 of 2014	Describe the portion of the development as per the project description that relates to the applicable listed activity.
Activity 12	The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape	In terms of the National Vegetation Map, 2019, Hartenbos Dune Thicke (Ecosystem Status, 2022: Endangered) is mapped on the majority of the property; Garden Route Granite Fynbos (Critically Endangered) is mapped in the north western corner of the

	i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.	property. The cleared area in the south east is mapped as Hartenbos Dune Thicket (NatVeg Map, 2019) In terms of the Western cape biodiversity Plan (WCBSP), Terrestrial critical biodiversity area (CBA) and Ecological support areas are mapped on the property. No watercourses occur on the site. The site is not situated within an aquatic CBA or ESA (WC BSP) Clearing of approximately 2.5 ha vegetation commenced 2020. This activity has ceased, and natural revegetation has occurred.
Activity 14	The development of—(ii) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs— (a) within a watercourse; (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse; **i. Western Cape** i. Outside urban areas: (dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;	In terms of the Western cape biodiversity Plan, 2023 (WCBSP), Terrestrial critical biodiversity area (CBA) and Ecological support areas are mapped in sections on the property. The site is not situated within an aquatic CBA or ESA (WC BSP) Two artificial watercourses occur on site; natural wetland occurs outside site boundary on south east. Ponds will be retained as part of SW management on the site. Warehouses, storage and access roads will be developed within 32 meters of these ponds. Site is mapped as falling within urban edge; however the surrounding area is not yet built up and site zoned as agricultural 1 area. Activity 14, LN3 is included for authorisation.
Activity 26	Phased activities for all activities—i. listed in this Notice and as it applies to a specific geographical area, which commenced on or after the effective date of this Notice; or	Clearing commenced in 2020 by Ideal trading. Furtherance of clearing for development of storage and warehouses required to facilitate proposal.

Please note:

Where approvals for the activity have been obtained in terms of any other legislation (e.g. National Water Act, Act 36 of 1998), certified copies of such approvals must be attached to this form.

2. ACTIVITY DESCRIPTION

(Cross out the appropriate box "☒" and provide a description where required).

Is/are the activity(ies) complete or is/are the activity(ies) still to be completed?	Completed	**Incomplete**
(a) Is/was the project a new development or an upgrade of an existing development? Also indicate the date (e.g. 2 August 2010) when the activity commenced as well as the original date of commencement if the application is an upgrade.	**New**	Upgrade

The property was originally utilised for agriculture (crop production) but has not been farmed since 2014. In 2020 approximately 2.5 ha of the property was cleared (south eastern corner). On 31 October 2022, the Western Cape Department of Environmental Affairs & Development Planning (DEADP) issued a Pre-Compliance Notice to Ideal Trading informing that the activities undertaken to develop a brickworks, are unauthorised since vegetation was removed and material was excavated/moved without prior Environmental Authorisation. Clearing activities ceased; Ideal Trading was given the option to either apply for retrospective authorisation through means of a Section 24G process, or to restore and rehabilitate the area to its natural condition. Ideal Trading opted to restore and rehabilitate the affected area. A site verification was carried out in 2022 (Appendix H3) and a rehabilitation plan compiled in 2022 (Appendix H5) on behalf of Ideal Trading cc.

The rehabilitation plan was accepted on 7 February 2023. No further development activities have since taken place (DEADP Reference: 14/1/1/E3/9/2/3/L1270/22).

The new landowner (Sapphire Ocean Investments (RF) (Pty) Ltd) acquired the land in 2023 and is proposing to develop a mixed use / light industrial development on the property. A Terrestrial biodiversity assessment was carried out in May 2024 on behalf of new landowner; the illegally cleared area has revegetated over the past 4 years; this area, prior to disturbance in 2020, was an already transformed area (i.e., agricultural activities ceased in 2014 and clearing took place six years later)

(b) Clearly describe the activity and associated infrastructure commenced with, indicating what has been completed and what still has to be completed.

No development has yet commenced. Clearing activities ceased in 2020; the new landowner acquired the land in 2023 with the intention of the development of light industrial activities and storage warehouses. The landowner would like to get Environmental authorisation via the S24G environmental authorisation process due to the previous non-compliance, prior to commencement of the proposed activity.

(c) Please provide details of all components of the activity and attach diagrams (e.g. architectural drawings or perspectives, engineering drawings, process flow charts etc.).

Buildings	YES	NO

Provide brief description:

No development has taken place. Previous clearing took place in 2020.

The proposed development entails 183 storage units and 40 light industrial workshops.

Infrastructure (e.g. roads, power and water supply/ storage)	YES	NO

Provide brief description:

No development has taken place. Previous clearing took place in 2020.

The proposed development entails 183 storage units and 40 light industrial workshops. The site is divided into 4 portions by Sorgfontein and Sandhoogte roads. Two access points to the site are proposed form Sandhoogte road. The road width is proposed to be 6.0m on main access streets and 5.2m on minor internal roads.

Processing activities (e.g. manufacturing, storage, distribution)	YES	NO

Provide brief description:

The proposed development entails 183 storage units and 40 light industrial workshops. The zoning will be mixed / light industrial. Details of light industrial workshop activities has not been provided.

Storage facilities for raw materials and products (e.g. volume and substances to be stored)

Provide brief description	YES	NO

Nothing has yet been developed; the proposed development entails 183 storage units and 40 light industrial workshops. The zoning will be mixed / light industrial. Details of light industrial workshop activities has not been provided.

Storage and treatment facilities for solid waste and effluent generated by the project	Yes	No
Provide brief description		
Sewer from the development will drain to the south-western boundary where it will connect into the main municipal sewer line flowing into the Great Brak River WWTW. Capacity at the recently upgraded Groot Brak WWTW has been confirmed. (Refer to Services report and designs in Appendix B)		

(d) Other activities (e.g. water abstraction activities, crop planting activities)	Yes	No
Provide brief description		
The proposed SDP entails 183 storage units and 40 light industrial workshops. The zoning will be mixed / light industrial. Details of light industrial workshop activities has not been provided. Sewer from the development will drain to the south-western boundary where it will connect into the main municipal sewer line flowing into the Great Brak River WWTW. Capacity at the recently upgraded Groot Brak WWTW has been confirmed. Bulk water is available for this proposed development; the demand for this proposed development is calculated at approximately 56kl/day. Access points and internal roads will be provided. Stormwater management measures will be installed. Sufficient capacity is available on the existing 11kV reticulation network to supply the estimated load of 607kVA to the development from the existing Midbrak (11/11kV) switching station.		

3. PHYSICAL SIZE OF THE ACTIVITY

Indicate the physical spatial size of the activity as well as associated infrastructure (footprints):	14 ha
Indicate the area that has been transformed / cleared to allow for the activity as well as associated infrastructure	2.5 ha
Total area:	**18.4 ha**

Approximately 2.5 ha was previously cleared. The proposed site is an estimated 18.4 ha.
The following is proposed in the SDP alternative 2 (appendix B2):

- Total lettable area _ proposed SDP = 46 416 m2

Workshops footprint (including services and internal roads and parking)–

- Total workshops: 41690m2

Storage (including services and internal roads and parking

- Total storage: 4726 m2

Estimated development footprint

- Footprint -14 ha (workshops and storage and internal roads)
- Existing roads -transversing the site (Sandhoogte and Sorgfontein roads) - 2.3 ha
- Open space – 2.1 ha

Was there an existing access road?	**YES**	**NO**
If NO, what was the distance over which the new access road was built? Please indicate the length and width of the new road.	(Length)	m
	(width)	m
Describe the type of access road constructed:		
Access to the site is proposed from two access points. The first will be on Sandhoogte Rd (East), at a point approximately 103m east of the intersection with Sorgfontein Rd. The second is proposed from Sandhoogte Rd (West), at a point approximately 117m west of the intersection with Sorgfontein Rd. Internal roads will be provided. Road width to be 6.0m on main access streets and 5.2m on minor internal streets. Refer to TIA (Appendix H4)		

Please Note:
Indicate the position of the access road on the site plan (See Section 5 below)

4. SITE PHOTOGRAPHS

Colour photographs of the site and its surroundings (taken of the site and from the site), both before (if available) and after the activity commenced, with a description of each photograph, must be attached to this application. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide past and recent aerial photographs. It should be supplemented with additional photographs of relevant features on the site. Date and source of photographs must be included. Photographs must be attached as an **appendix** to this form.

Please note:

Should the relevant photographs not be included in the application, the application may be deemed insufficient and further information in this regard will be requested.

PHOTOGRAPHS ARE PROVIDED IN APPENDIX D.

5. APPLICABLE LEGISLATION, POLICIES AND/OR GUIDELINES

Please list all legislation, policies and/or guidelines that were or are relevant to this activity.

LEGISLATION	ADMINISTERING AUTHORITY	TYPE Permit/ license/ authorisation/comment	DATE (if already obtained):
National Environmental Management Act (Act No. 107 of 1998)	DEADP	Environmental authorisation Section 24G of NEMA	In process (this application)
Environmental Impact Assessment Regulations (2014, as amended)	DEADP	Environmental authorisation	In process (this application)
CONSERVATION OF AGRICULTURAL RESOURCES ACT, 1983 (ACT 43 OF 1983)	Western Cape Department of Agriculture	Soil permit – cultivation of virgin soil	No longer required; change in land use from agricultural to mixed / light industrial
National Water Act (act 36 of 1998)	DWS / BOGMA	Authorisation for water uses:	GA for Section 21 c and i
The Nature Conservation Ordinance (Ord 19 of 1974)	Cape Nature	Permits for flora and fauna listed in terms of PNCO – all tortoises, most snakes, most birds and nesting sites, all frogs, a number of plants protected in terms of the PNCO	Likely required prior to site clearing
National Environmental Management Act: Biodiversity Act (Act No. 10 of 2004)	Cape Nature	Permits of SCC flora and fauna listed in terms of NEMBA	Likely required prior to site clearing
National Forest Act No 84 of 1998 as amended / Forestry Laws Amendment Act (Act 35 Of 2005)	Department of Forestry	Permits for protected trees listed in terms of NFA	May be required prior to site clearing
Other legislation consulted and relevant measures / principles incorporated into EMPR / required			
Constitution Of The Republic Of South Africa	RSA		All legislation to be in line with constitution

LEGISLATION	ADMINISTERING AUTHORITY	TYPE Permit/ license/ authorisation/comment	DATE (if already obtained):
(Act 108 Of 1996)			
National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA).	Heritage WC	Mitigation included in EMPr	Likely required during exaction activities; chance finds procedure to be in place and identified specialist on call
National Veld and Forest Fire Act (Act 101 Of 1998)	Southern Cape Fire Protection Association (SCFPA)	Fire management plan and controlled burning	Recommended to join SCFPA to ensure compliance to Act due to fire driven fynbos ecosystem and requirement of this vegetation to burn at least once every 20 years. Fire preventions and response to be in place.
National Environmental Management Act: Waste Act (Act No 59 of 2008)	DFFE	No licensing required. No actvities requiring licensing in terms of NEMA permitted or assessed.	Waste management hierarchy to be in place at all times.
National Environmental Management Act: Air Quality Act (Act No 39 of 2004)	Garden Route District Municipality	No licensing required; no activities requiring a permit in terms of NEMAQA permitted or assessed.	Dust control to be in place at all times.
National Environmental Management: Protected Areas Act (Act No. 57 of 2003)	DFFE Cape Nature SANParks	No formal permission required.	
National Environmental Management Amendment Act (Act 62 Of 2008)	DEADP EA CAPE NATURE permits WC transport	As required	
Environmental Conservation Act (Act No. 73 of 1989)	DFFE	General Policy in terms of ECA	EMPR
The Fencing Act (Act No. 31 of 1963) i	Western Cape Department of agriculture	Fencing Requirements	
Municipal system Act (32 of 2000) Western Cape Land Use Planning Act, 2014 (Act 3 of 2014) SPLUMA (Act 13 Of 2013) MOSSEL BAY MUNICIPALITY ZONING SCHEME BY-LAW	MBM	Rezoning required – town planner appointed to carry out the required rezoning application process. Mixed Zone II (MZII) The objective of this zone is to accommodate compatible land uses in previously light industrial areas situated along major corridors and activity nodes.	In process

LEGISLATION	ADMINISTERING AUTHORITY	TYPE Permit/ license/ authorisation/comment	DATE (if already obtained):
		Primary use - Light industry and Business premises	
Hazardous Substances Act, 1973 (Act 15 of 1973)	Department of Health	No noxious substances or dangerous goods may be stored on site (more than 30m3) and no activities requiring air quality permit - these activities have not been assessed.	
Major Hazard Installation Regulations, 2022			
Regulations for Hazardous Chemical Agents, 2021			
The Occupational Health and Safety Act (OHSA), 1993 (Act No. 85 of 1993)	Department of Labour Department of Health		As required
The National Health Act	Department of Health	Norms and standards for construction sites and vacant land	As required

POLICY/ GUIDELINES	ADMINISTERING AUTHORITY
DFFE Screening tool and relevant protocols	DFFE
DWS Risk Assessment Matrix	DWS
Western Cape Biodiversity Spatial Plan, 2023	DEADP / Cape Nature
Ecosystem Guidelines for Environmental Assessment in the Western Cape, fynbos Forum	DEADP / Cape Nature
List of Threatened Ecosystems, 2022	DEADP / Cape Nature
SANBI VEGMAP 2024	SANBI / Cape Nature
The Garden Route Environmental Management Framework	Garden route District Municipality
Mossel Bay Spatial Development Framework / IDP	Mossel Bay Municipality
MOSSEL BAY MUNICIPALITY SPATIAL DEVELOPMENT FRAMEWORK / ENVIRONMENTAL MANAGEMENT FRAMEWORK	Mossel Bay Municipality
DEA (2014), Companion to the EIA Regulations 2014, Integrated Environmental Management Guideline Series 5, Department of Environmental Affairs, (DEA), Pretoria, South Africa	DEADP / DWS / WC Agriculture / Cape Nature
DEADP (2014) Guideline on Public Participation, EIA Guideline and Information Document Series. Western Cape Department of Environmental Affairs & Development Planning	DEADP
NEMA EIA Regulations Guideline and Information Document Series: Guideline on Alternatives Guideline on Appeals Guideline on Exemption Applications Guideline on Need and Desirability Guideline on Public Participation Guideline on Transitional Arrangements Guideline for determining the Scope of Specialist	DEADP

Involvement in EIA Processes Guideline for involving Visual and Aesthetic Specialists in EIA Processes Guideline for involving Social Assessment Specialists in EIA Processes Guideline for involving Hydrogeologists in EIA Processes Guideline for involving Biodiversity Specialists in EIA Processes Guideline for Environmental Management Plans	

6. APPLICATIONS IN TERMS OF NEMA AND SPECIFIC ENVIRONMENTAL MANAGEMENT ACTS ("SEMAS")

If not specifically applied for in terms of this application, does the development require an application for a waste management license in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)?	YES	**NO**
If yes, has an application been submitted to the licensing authority?	YES	NO
Does the proposed project require an application for a water use license in terms of the National Water Act, 1998 (Act No. 36 of 1998)?	YES	**NO**
If yes, has an application been submitted to the licensing authority?	YES	NO
If no, please provide evidence of existing water use rights (if applicable) with this application form.		
Does the proposed project require an application for an atmospheric emissions license in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)?	YES	**NO**
If yes, has an application been submitted to the licensing authority?	YES	NO
Does the proposed project require an application in terms of the National Environmental Management: Integrated Coastal Management Act ("NEM: ICMA")?	YES	**NO**
If yes, has an application been submitted to the relevant competent authority?	YES	NO
If yes, provide more details of the application submitted/to be submitted in terms of the NEM: ICMA		

7. APPLICATIONS IN TERMS OF OTHER LEGISLATION

Is any permission, licence or other approval required in terms of any other legislation? (Please tick)	**YES**	NO

If yes, please complete the table below:

Type of approval required (List the applicable legislation & approval required):	Name of the authority responsible for administering the applicable legislation	Application submitted (Yes / No)	Status of application (e.g. pending/ granted/ refused)
Permits for disturbance / removal of any protected trees in terms of the National Forestry Act	DFFE - Forestry	As required	
Permits for protected fauna or flora species in terms of the national Environmental Management: Biodiversity Act	Cape Nature	As required	
Permits for species as identified in the Provincial Nature Conservation Ordinance	Cape Nature	As required	
National Veld and Forest Fire Act (Act 101 Of 1998) - Development of fire management practices to prevent and combat fires and legal duty and responsibility to ensure that veld fires do not break out on their property, and to take preventative measures to minimize the risk of fires spreading. Due to the fire risk inherent for any fire driven ecosystem (fynbos), it is important that this application be reviewed by the Southern Cape Fire Protection Association (SCFPA) so they can provide comments on management recommendations. Assistance with controlled fire blocks on the property is important for the fire-driven ecosystem.	SCFPA	As required	
General authorisation for section 21 c and I (within 500 meters of natural and artificial wetlands – within DWs regulated area)	DWS / BGMA	As required	
Note – these requirements can be put in place once and EA is attained, prior to site establishment when search and rescue commences. Permits and GA – allow for a maximum of 3 months for application and GA / Permits to be issued.			

SECTION C: DESCRIPTION OF RECEIVING ENVIRONMENT

SITE/AREA DESCRIPTION

For linear activities (pipelines, etc.) as well as activities that cover very large sites, it may be necessary to complete copies of this section for each part of the site that has a significantly different environment. In such cases please complete copies of Section C and indicate the area which is covered by each copy No. on the site plan.

Section C Copy No. (e.g. 1, 2, or 3):

Refer to Appendix M for full impact assessment

1. THE GEOLOGICAL FORMATIONS UNDERLYING THE SITE (TICK THE APPROPRIATE BOX)

GRANITE	**X**	QUARTZITE	
SHALE		DOLOMITE	
SANDSTONE		DOLERITE	
OTHER (specify)			

2. GRADIENT OF THE SITE

Indicate the general gradient of the site(s) (cross out the appropriate box).

Flat	**Flatter than 1:10**	**1:10 – 1:5**	**Steeper than 1:5**

3. LOCATION IN LANDSCAPE

Indicate the landform(s) that best describes the site (cross out ("☒") the appropriate boxes).

Ridgeline	Plateau	Side slope of hill/mountain	Closed valley	Open valley	**Plain**	**Undulating plain/low hills**	Dune	Sea-front	Other
If other, please describe									

4. GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE

4.1 GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE (PRE-COMMENCEMENT)

Is the site(s) located on or near any of the following (cross out ("☒") the appropriate boxes)?

Shallow water table (less than 1.5m deep)	[redacted]	NO	[redacted]
Seasonally wet soils (often close to water bodies)	[redacted]	NO	[redacted]
Unstable rocky slopes or steep slopes with loose soil	[redacted]	NO	[redacted]
Dispersive soils (soils that dissolve in water)	[redacted]	NO	[redacted]
Soils with high clay content	[redacted]	NO	[redacted]
Any other unstable soil or geological feature	[redacted]	NO	[redacted]
An area sensitive to erosion	YES	[redacted]	[redacted]

4.2 GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE (POST-COMMENCEMENT)

Shallow water table (less than 1.5m deep)	[redacted]	NO	[redacted]
Seasonally wet soils (often close to water bodies)	[redacted]	NO	[redacted]
Unstable rocky slopes or steep slopes with loose soil	[redacted]	NO	[redacted]
Dispersive soils (soils that dissolve in water)	[redacted]	NO	[redacted]
Soils with high clay content	[redacted]	NO	[redacted]
Any other unstable soil or geological feature	[redacted]	NO	[redacted]
An area sensitive to erosion	YES	[redacted]	[redacted]

If any of the answers to the above are "YES" or "unsure", specialist input may be requested by the Department.
(Information in respect of the above will often be available at the planning sections of local authorities. Where it does not exist, the 1:50 000 scale Regional Geotechnical Maps prepared by Geological Survey may also be used).

5. SURFACE WATER

5.1 SURFACE WATER (PRE-COMMENCEMENT)

Indicate the surface water present on and or adjacent to the site and alternative sites (cross out ("☒") the appropriate boxes)?

Perennial River	[redacted]	NO	[redacted]
Non-Perennial River	[redacted]	NO	[redacted]
Permanent Wetland	[redacted]	NO	[redacted]
Seasonal Wetland	[redacted]	NO	[redacted]
Artificial Wetland	YES	[redacted]	[redacted]
Estuarine / Lagoonal wetland	[redacted]	NO	[redacted]

5.2 SURFACE WATER (POST-COMMENCEMENT)

Indicate the surface water present on and or adjacent to the site and alternative sites (cross out ("☒") the appropriate boxes)?

Perennial River	[redacted]	NO	[redacted]
Non-Perennial River	[redacted]	NO	[redacted]
Permanent Wetland	[redacted]	NO	[redacted]
Seasonal Wetland	[redacted]	NO	[redacted]
Artificial Wetland	YES	[redacted]	[redacted]
Estuarine / Lagoonal wetland	[redacted]	NO	[redacted]

6. VEGETATION AND/OR GROUNDCOVER

Please note: The Department may request specialist input/studies depending on the nature of the biodiversity occurring on the site and potential impact(s) of the activity/ies. To assist with the identification of the biodiversity occurring on site and the ecosystem status consult http://bgis.sanbi.org.za or BGIShelp@sanbi.org.za. Information is also available on compact disc ("cd") from the Biodiversity-GIS Unit, Ph (021) 799 8738. This information may be updated from time to time and it is the applicant/ EAP's responsibility to ensure that the latest version is used. A map of the relevant biodiversity information (including an indication of the habitat conditions as per (b) below) and must be provided as an overlay map to the property/site plan as an **appendix** to this form.

6.1 VEGETATION AND/OR GROUNDCOVER (PRE-COMMENCEMENT)

Cross out ("☒") the block **and** describe (where applicable) the vegetation types / groundcover present on the site before commencement of the activity.

Indigenous Vegetation - good condition	**Indigenous Vegetation with scattered aliens**	**Indigenous Vegetation with heavy alien infestation**
Describe the vegetation type above: Historically mapped vegetation includes Hartenbos Dune Thicket (EN) and Garden Route Granite Fynbos (CR) (NatVEG, 2019) and utilised for agriculture for at least 50 years and then left fallow since about 2014. Vegetation characterised by ruderal and weedy plant species.	Describe the vegetation type above: Historically mapped vegetation includes Hartenbos Dune Thicket (EN) and Garden Route Granite Fynbos (CR) (NatVEG, 2019) and utilised for agriculture for at least 50 years and then left fallow since about 2014. Vegetation characterised by ruderal and weedy plant species.	Describe the vegetation type above: Historically mapped vegetation includes Hartenbos Dune Thicket (EN) and Garden Route Granite Fynbos (CR) (NatVEG, 2019) and utilised for agriculture for at least 50 years and then left fallow since about 2014. Vegetation characterised by ruderal and weedy plant species.
Provide ecosystem status for above: Hartenbos Dune Thicket (EN) Garden Route Granite Fynbos (CR)	Provide ecosystem status for above: Hartenbos Dune Thicket (EN) Garden Route Granite Fynbos (CR))	Provide Ecosystem status for above: Hartenbos Dune Thicket (EN) Garden Route Granite Fynbos (CR))
Indigenous Vegetation in an ecological corridor or along a soil boundary / interface	Veld dominated by alien species Historically mapped vegetation includes Hartenbos Dune Thicket (EN) and Garden Route Granite Fynbos (CR) (NatVEG, 2019) and utilised for agriculture for at least 50 years and then left fallow since about 2014. Vegetation characterised by ruderal and weedy plant species.	Distinctive soil conditions (e.g. Sand over shale, quartz patches, limestone, alluvial deposits, termitaria etc.) – describe
Bare soil	Building or other structure	Sport field
Other (describe below)	**Cultivated land** Utilised for agriculture for at least 50 years and then left fallow since about 2014. Vegetation characterised by ruderal and weedy plant species.	Paved surface

(a) Highlight the applicable pre-commencement biodiversity planning categories of all areas on site and indicate the reason(s) provided in the biodiversity plan for the selection of the specific area as part of the specific category.

Systematic Biodiversity Planning Category				**If CBA or ESA, indicate the reason(s) for its selection in biodiversity plan**
Critical Biodiversity Area (CBA)	**Ecological Support Area (ESA)**	**Other Natural Area (ONA)**	**No Natural Area Remaining (NNR)**	Historically mapped vegetation includes Hartenbos Dune Thicket (EN) and Garden Route Granite Fynbos (CR) (NatVEG, 2019) and utilised for agriculture for at least 50 years and then left fallow since about 2014. Vegetation characterised by ruderal and weedy plant species. The western half of the project area occurs within an ESA 1 with a small portion of CBA 1 in the northwestern corner of the project area. Only a small portion of CBA 2 and ESA 2 occur along the southeastern boundary of the project area (WC BCP)

(b) Highlight and describe the habitat condition on site.

Habitat Condition	Percentage of habitat condition class (adding up to 100%)	Description and additional Comments and Observations (including additional insight into condition, e.g. poor land management practises, presence of quarries, grazing/harvesting regimes etc).
Natural	-	The western half of the project area occurs within an ESA 1 with a small portion of CBA 1 in the northwestern corner of the project area. Only a small portion of CBA 2 and ESA 2 occur along the southeastern boundary of the project area (WC BCP)
Near Natural (includes areas with low to moderate level of alien invasive plants)	11.4%	Approximately 2.1 ha on the steeper areas on the NE section of the site are considered near natural as this area did not appear to be completely transformed in aerial images (1963 – 2024). This area is mapped as Garden route granite fynbos and is mostly excluded from the proposed SDP due to steep terrain and retaining of the pond. It is also mapped partly as CBA1 / ESA1 in the WCBSP.
Degraded (includes areas heavily invaded by alien plants)	76.1%	The remaining area (estimated 14ha) is considered to be degraded due to intensive agriculture use between 1963 and 2014)
Transformed (includes cultivation, dams, urban, plantation, roads, etc)	12.5%	Approximately 2.3 ha of the area is completely transformed by traversing Zandhoogte and Sorgfontein roads

(c) Complete the table to indicate:
(i) the type of vegetation, including its ecosystem status, that was previously present on the site; and
(ii) whether an aquatic ecosystem was previously present on site.

Terrestrial Ecosystems		Aquatic Ecosystems						
Ecosystem threat status as per the National Environmental Management: Biodiversity Act,2004 (Act No. 10 of 2004)	**Critical**	Wetland (including rivers, depressions, channelled and un-channelled wetlands, flats, seeps pans, and **artificial wetlands**)			Estuary		Coastline	
	Endangered							
	Vulnerable							
	Least Threatened	**YES**	NO	UNSURE	YES	**NO**	YES	**NO**

(d) Please provide a description of the vegetation type and/or aquatic ecosystem present on site, including any important biodiversity features/information identified on site (e.g. threatened species and special habitats)

Historically mapped vegetation includes Hartenbos Dune Thicket (EN) and Garden Route Granite Fynbos (CR) (NatVEG, 2019) and utilised for agriculture for at least 50 years and then left fallow since about 2014.
Vegetation characterised by ruderal and weedy plant species.
The western half of the project area occurs within an ESA 1 with a small portion of CBA 1 in the northwestern corner of the project area. Only a small portion of CBA 2 and ESA 2 occur along the southeastern boundary of the project area (WC BCP).

There are no natural watercourses that will be impacted by the project, and the proposal will not result in reduced aquatic biodiversity (Upstream Consulting, Appendix H2). No sensitive aquatic features are present; two farm dams are in place and the revised SDP (Appendix D4) excludes these dams from the development footprint and incorporates them into the future SWMP for the proposed development.

Impacts associated with the Terrestrial Biodiversity Theme will be low to negligible given that the development is not situated within an Endangered or Critically Endangered Ecosystem or within a Protected Area or NPAES. Furthermore, the field survey confirmed that the underlying features that drivers of the CBA and ESA status of a portion of the project area, are not present, and therefore development within this area will not impact on the management of these features. Impacts on the CBA and ESA are therefore low to negligible (Biodiversity Africa, Appendix H1).

The plant species diversity of the project area was relatively low, and the vegetation cover was largely dominated by a few pioneer shrub species (namely *Osteospermum moniliferum, Helichrysum cymosum, Passerina corymbosa, Dicerothamnus rhinocerotis, Searsia pallens*) interspersed with herbs and other shrubs with a lower percentage cover.
Seventy-three (73) plant species were recorded during the field survey, of which sixty (60) are indigenous and twelve (12) are exotic.
Five (5) of the exotic species are categorised in terms of the National Environmental Management: Biodiversity Act (NEM:BA) (Act No. 10 0f 2004) and/or the Conservation of Agricultural Resources Act (CARA) (Act No. 43 of 1983).

All Category 1b and 2 species listed under NEM:BA and all Category 1 and 2 species listed under CARA need to be removed, and ongoing follow up measures implemented to ensure that individuals do not return. Refer to EMPr.

The DFFE Screening Report classifies the plant species theme of the project area as medium, with Twenty-five (25) Sensitive Plant Species identified. Medium sensitivity does not indicate the known presence of a threatened plant(s) within the proposed development footprint/PAOI but could indicate moderate likelihood of occurrence based on species distribution modelling, which relies on data such as habitat preferences and proximity to known locations of specific species (SANBI, 2020).

Only one (1) plant SCC was recorded during the field survey, namely *Hermannia lavandulifolia* classified as VU under category A2c. This species was present in low densities, and its distribution was restricted to the southwestern corner of the project area (near Sandhoogte Road). H. lavandulifolia is a widespread and common species, with an extent of occurrence (EOO) of 12 018 km². Its habitat typically includes clay slopes in renosterveld and valley thicket. It is declining due to significant, ongoing habitat loss and degradation. Based on the observed rate of habitat loss, a population reduction of 31% over three generations is inferred. It is therefore listed as Vulnerable under criterion A (von Staden, 2018). No other SCC were recorded during the field survey. Although species such as Euchaetis albertiniana and Agathosma macrocarpa have been recorded in remnant patches of natural vegetation nearby, considering the transformed nature of the project area, the botanist is of the opinion that the likelihood of occurrence of these and any additional SCC is moderate to low.

The loss of the entire project area (18.5 ha) would constitute a habitat loss of 0.002% for this species while the loss of the southwestern corner or the project area (2.4 ha) would constitute a habitat loss of 0.0002%. Impacts of the development on this species is therefore considered to be low.

The DFFE Screening Report classifies the Animal Species Theme of the project area as HIGH due to the known presence of four (4) sensitive bird species and MEDIUM due to the possible occurrence of two (2) sensitive insect species, two (2) sensitive mammal species, and one (1) sensitive invertebrate species

The project area occurs within, or partly within, the distribution range of 20 amphibian species, 70 reptile species, 114 mammal species, and 458 bird species (IUCN, 2022). Of these species, 17 mammal species and 19 bird species are listed as threatened (CR, EN and VU) or near threatened (NT) species which are collectively referred to as SCC. No reptile or amphibian SCC have a distribution range that includes the project area.

There is a limited diversity of faunal habitats available due to the fairly uniform vegetation on site probably as a result of having been previously cultivated.

The project area is fenced so it is unlikely that large mammals could enter the project even if they were present (except for a section along the northeastern boundary where the fence has collapsed).

Two mammal (2) SCC have a high likelihood of occurrence:

- African striped weasel (*Poecilogale albinucha*)
- Fynbos golden mole (*Amblysomus corriae*)

Nine mammal (9) SCC have a low likelihood of occurrence:

- Spectacled dormouse (*Graphiurus ocularis*)
- African clawless otter (*Aonyx capensis*)
- Grey rhebok (*Pelea capreolus*)
- African marsh rat (*Dasymys incomtus*)
- Serval (*Leptailurus serval*)
- Leopard (*Panthera pardus)*
- *Sensitive Species 8*
- Long-tailed Forest Shrew (*Myosorex longicaudatus)*
- Duthie's golden mole (*Chlorotalpa duthieae*)

The project area intersects with the distribution range of nineteen (19) bird SCC. one Ave SCC (1) has a high likelihood of occurrence:

- Denham's Bustard *(Neotis denhami)*

Two Ave SCC (2) of which have a moderate likelihood of occurrence:

- Martial Eagle (*Polemaetus bellicosus*)
- African Marsh Harrier (*Circus ranivorus*)

Sixteen (16) of which have a low likelihood of occurrence due to the lack of suitable habitat.

6.2 VEGETATION AND/OR GROUNDCOVER (POST-COMMENCEMENT)

Cross out ("☒") the block **and** describe (where required) the vegetation types / groundcover present on the site after commencement of the activity.

Indigenous Vegetation - good condition		**Indigenous Vegetation with scattered aliens**		**Indigenous Vegetation with heavy alien infestation**	
Describe the vegetation type above: Historically mapped vegetation includes Hartenbos Dune Thicket (EN) and Garden Route Granite Fynbos (CR) (NatVEG, 2019) and utilised for agriculture for at least 50 years and then left fallow since about 2014. Vegetation characterised by ruderal and weedy plant species.		Describe the vegetation type above: Historically mapped vegetation includes Hartenbos Dune Thicket (EN) and Garden Route Granite Fynbos (CR) (NatVEG, 2019) and utilised for agriculture for at least 50 years and then left fallow since about 2014. Vegetation characterised by ruderal and weedy plant species.		Describe the vegetation type above: Historically mapped vegetation includes Hartenbos Dune Thicket (EN) and Garden Route Granite Fynbos (CR) (NatVEG, 2019) and utilised for agriculture for at least 50 years and then left fallow since about 2014. Vegetation characterised by ruderal and weedy plant species.	
Provide ecosystem status for above: Hartenbos Dune Thicket (EN) Garden Route Granite Fynbos (CR)		Provide ecosystem status for above: Hartenbos Dune Thicket (EN) Garden Route Granite Fynbos (CR))		Provide Ecosystem status for above: Hartenbos Dune Thicket (EN) Garden Route Granite Fynbos (CR))	

Indigenous Vegetation in an ecological corridor or along a soil boundary / interface	Veld dominated by alien species Historically mapped vegetation includes Hartenbos Dune Thicket (EN) and Garden Route Granite Fynbos (CR) (NatVEG, 2019) and utilised for agriculture for at least 50 years and then left fallow since about 2014. Vegetation characterised by ruderal and weedy plant species.	Distinctive soil conditions (e.g. Sand over shale, quartz patches, limestone, alluvial deposits, termitaria etc.) – describe
Bare soil	Building or other structure	Sport field
Other (describe below)	**Cultivated land** Utilised for agriculture for at least 50 years and then left fallow since about 2014. Vegetation characterised by ruderal and weedy plant species.	Paved surface

(a) 1

(b) How have the vegetation and/or aquatic ecosystem(s) present on site (including any important biodiversity features identified on site (e.g. threatened species and special habitats)) been affected by the commencement of the listed activity(ies)?

Historically mapped vegetation includes Hartenbos Dune Thicket (EN) and Garden Route Granite Fynbos (CR) (NatVEG, 2019) and utilised for agriculture for at least 50 years and then left fallow since about 2014. Vegetation characterised by ruderal and weedy plant species. The western half of the project area occurs within an ESA 1 with a small portion of CBA 1 in the northwestern corner of the project area. Only a small portion of CBA 2 and ESA 2 occur along the southeastern boundary of the project area (WC BCP). No sensitive aquatic features are present; only an old farm dam is in place and this is proposed to be incorporated into the future SWMP for the proposed development.
Clearing of 2.5ha would have resulted in disturbance to previously disturbed vegetation and habitats with only ruderal and weedy plant species present. The loss of the entire project area (18.5 ha) would constitute a habitat loss of 0.002% for identified flora SCC (*Hermannia lavandulifolia)* while the loss of the southwestern corner or the project area (2.4 ha) would constitute a habitat loss of 0.0002%. The proposed development is expected to result in a loss of approximately 0.07% of already degraded habitat within the AOO for the identified mammal SCC.

6.3 VEGETATION / GROUNDCOVER MANAGEMENT

(a) Describe any mitigation/management measures that were adopted and the adequacy of these:

No further disturbance has taken place on the site since the notice of intent to issue a precompliance was issued (since 2020). A rehabilitation plan was drafted and accepted by the DEADP, but it is not evident that the 2.5 ha was actively rehabilitated by Ideal Trading cc. The site has naturally regenerated, however intensive use from 1963 has resulted in an area no longer representative of historical vegetation and associated habitats and forage areas. The proposed development by the new landowner would entail the required levelling which would then address the area disturbed by Ideal Trading without an EA in place.

6.4 LAND USE OF THE SITE (PRE-COMMENCEMENT)

Please note: The Department may request specialist input/studies depending on the nature of the land use character of the area and potential impact(s) of the activity/ies.

Untransformed area	Low density residential	Medium density residential	High density residential	Informal residential
Retail	Commercial &	Light industrial	Medium industrial	Heavy industrial

	warehousing			
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	Tourism & Hospitality facility
Open cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	**Dam** or reservoir
Hospital/medical centre	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	Agriculture	River, stream or wetland	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):	Utilised for agriculture for at least 50 years and then left fallow since about 2014. Two farm dams are in place. Two main roads traverse the site. Clearing prior to EA was carried out; clearing ceased in 2020. The site is currently vacant and undeveloped and degraded due to past use. Furtherance of clearing required to facilitate light industrial development proposal.			

(a) Please provide a description.

Utilised for agriculture for at least 50 years and then left fallow since about 2014. Two farm dams are in place. Two main roads traverse the site. Clearing prior to EA was carried out; clearing ceased in 2020. The site is currently vacant and undeveloped and degraded due to past use. Furtherance of clearing required to facilitate light industrial development proposal. Farm dams will be retained.

6.5 LAND USE CHARACTER OF SURROUNDING AREA (PRE-COMMENCEMENT)

Cross out ("☒") the block that reflects the past land uses and/or prominent features that occur/red within +/- 500m radius of the site and neighbouring properties if these are located beyond 500m of the site. **Please note:** The Department may request specialist input/studies depending on the nature of the land use character of the area and impact(s) of the activity/ies.

Untransformed area	**Low density residential**	Medium density residential	High density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	**Medium industrial**	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	Tourism & Hospitality facility
Open cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	Dam or reservoir
Hospital/medical centre	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	**Agriculture**	River, stream or wetland	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):	Surrounding landuse: - Residential houses (NE) - Restaurant (east) - Brickmaking (north) - WWTW (west) - Agricultural / undeveloped (NW)			

Figure 3: Land uses within 500 meters of Re/139 Zandhoogte

6.6 LAND USE CHARACTER OF SURROUNDING AREA (POST-COMMENCEMENT)

Cross out ("☒") the block that reflects the current land uses and/or prominent features that occur(s) within +/- 500m radius of the site and neighbouring properties if these are located beyond 500m of the site. **Please note:** The Department may request specialist input/studies depending on the nature of the land use character of the area and impact(s) of the activity/ies.

Untransformed area	**Low density residential**	Medium density residential	High density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	**Medium industrial**	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	Tourism & Hospitality facility
Open cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	Dam or reservoir
Hospital/medical centre	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	**Agriculture**	River, stream or wetland	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):	Surrounding landuse: - Residential houses (NE) - Restaurant (east) - Brickmaking (north) - WWTW (west(- Agricultural / undeveloped (NW)			

Habitat Condition – Post commencement	Percentage of habitat condition class (adding up to 100%)	Description and additional Comments and Observations (including additional insight into condition, e.g. poor land management practises, presence of quarries, grazing/harvesting regimes etc).
Natural	-	The western half of the project area occurs within an ESA 1 with a small portion of CBA 1 in the northwestern corner of the project area. Only a small portion of CBA 2 and ESA 2 occur along the southeastern boundary of the project area (WC BCP)
Near Natural (includes areas with low to moderate level of alien invasive plants)	11.4%	Approximately 2.1 ha on the steeper areas on the NE section of the site are considered near natural as this area did not appear to be completely transformed in aerial images (1963 – 2024). This area is mapped as Garden route granite fynbos and is mostly excluded from the proposed SDP due to steep terrain. It is also mapped partly as CBA1 / ESA1 in the WCBSP.
Degraded (includes areas heavily invaded by alien plants)	76.1%	The remaining area (estimated 14ha) is considered to be degraded due to intensive agriculture use between 1963 and 2014)
Transformed (includes cultivation, dams, urban, plantation, roads, etc)	12.5%	Approximately 2.3 ha of the area is completely transformed by traversing Zandhoogte and Sorgfontein roads

7. SOCIO-ECONOMIC CONTEXT

7.1 SOCIO-ECONOMIC CONTEXT (PRE-COMMENCEMENT)

Describe the pre-commencement social and economic characteristics of the community in order to provide baseline information.

Historically mapped vegetation includes Hartenbos Dune Thicket (EN) and Garden Route Granite Fynbos (CR) (NatVEG, 2019) and the site has been utilised for agriculture (crops) for at least 50 years and then left fallow since about 2014. Review of historical maps shows a dwelling, outbuilding, small farm dam and short access road to the dwelling form Zandhoogte road. The dwellings and road were in place on the SE corner of the site where the clearing took place in 2020. The site offered benefits to the socio-economic through the production of crops. A low number of employment opportunities is expected to have been associated with crop production on 18 ha; associated rates would have been generated for the MBM.

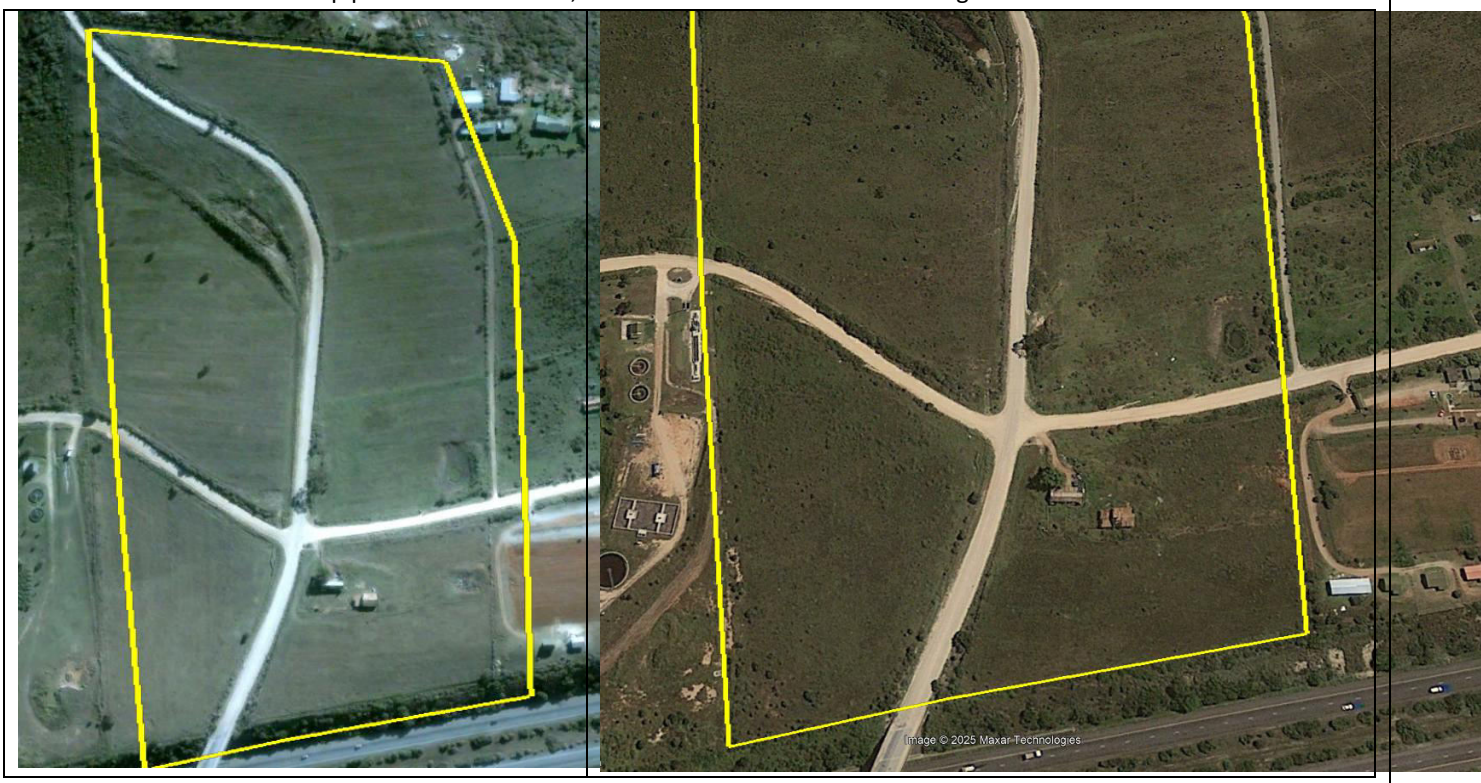

Figure 4: 2004 (left) 2011 (right) Google earth imagery showing cultivated land, dwellings, dam and small access road

7.2 SOCIO-ECONOMIC CONTEXT (POST-COMMENCEMENT)

Describe the post commencement social and economic characteristics of the community in order to determine any change. Where differences between pre- and post-commencement exist, state which are as a result of the activity(ies) for which rectification is being applied for.

Historically mapped vegetation includes Hartenbos Dune Thicket (EN) and Garden Route Granite Fynbos (CR) (NatVEG, 2019) and the site has been utilised for agriculture (crops) for at least 50 years and then left fallow since about 2014. Review of historical maps shows a dwelling, outbuilding, small farm dam and short access road to the dwelling form Zandhoogte road. The dwellings and road were in place on the SE corner of the site where the clearing took place in 2020. The intention of the 2020 clearing was to create brick making facility. No further clearing has taken place since the issuing of the precompliance notice by DEADP. The site has passively regenerated into a secondary disturbed vegetation area which is not representative of historical vegetation on the site. The new landowner is proposing a rezoning to a mixed / light industrial land use which will entail storage facilities and light industrial workshops.

The site is considered to be an infill development as development will take place on a site between existing developed portions and therefore bulk municipal services and in place in close proximity to the site. Infill developments considered to be a positive economic benefit to the local municipality due to additional rates and taxes being generated without the burden of additional capital outlay which is expected to strengthen the financial sustainability of the municipality in both the short- and longer term.

Employment opportunities will be created; with short term opportunities and skills development created during the construction phase (up to 5 years) and the creation of local economic opportunities as a result of materials, products and services that will be required for construction. Long term opportunities will be created by the light industrial workshops and operational management requirements.

The new landowner would like to address the illegal commencement of clearing which took place through the S24G application process. No activities by the new landowner have taken place.

8. HISTORICAL AND Cultural ASPECTS

(a) Please be advised that every application for Environmental Authorisation including an application for a Waste Management Licence, must include, where applicable the investigation, assessment and evaluation of the impact of any proposed listed or specified activity on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), excluding the national estate contemplated in section 3(2)(i)(vi) and (vii) of that Act.

Please be further advised that if section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), is applicable to your application, then you are requested to furnish this Department with written comment from Heritage Western Cape as part of your public participation process. Section 38 of the Act states as follows: "*38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as-*

- *(a) the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;*
- *(b) the construction of a bridge or similar structure exceeding 50m in length;*
- *(c) any development or other activity which will change the character of a site-*
  - *(i) exceeding 5 000 m² in extent; or*
  - *(ii) involving three or more existing erven or subdivisions thereof; or*
  - *(iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or*
  - *(iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;*
- *(d) the re-zoning of a site exceeding 10 000 m² in extent; or*
- *(e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.*"

(b) The impact on any national estate referred to in section 3(2), excluding the national estate contemplated in section 3(2)(i)(vi) and (vii), of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), must also be investigated, assessed and evaluated. Section 3(2) states as follows: "*3(2) Without limiting the generality of subsection (1), the national estate may include—*

- *(a) places, buildings, structures and equipment of cultural significance;*
- *(b) places to which oral traditions are attached or which are associated with living heritage;*
- *(c) historical settlements and townscapes;*
- *(d) landscapes and natural features of cultural significance;*
- *(e) geological sites of scientific or cultural importance;*
- *(f) archaeological and palaeontological sites;*
- *(g) graves and burial grounds, including—*
- *(i) ancestral graves;*
- *(ii) royal graves and graves of traditional leaders;*
- *(iii) graves of victims of conflict;*
- *(iv) graves of individuals designated by the Minister by notice in the Gazette;*
- *(v) historical graves and cemeteries; and*
- *(vi) other human remains which are not covered in terms of the Human Tissue Act, 1983 (Act No. 65 of 1983);*

(h) sites of significance relating to the history of slavery in South Africa;
(i) movable objects, including—
(i) objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens;
(ii) objects to which oral traditions are attached or which are associated with living heritage;
(iii) ethnographic art and objects;
(iv) military objects;
(v) objects of decorative or fine art;
(vi) objects of scientific or technological interest; and
(vii) books, records, documents, photographic positives and negatives, graphic, film or video material or sound recordings, excluding those that are public records as defined in section 1(xiv) of the National Archives of South Africa Act, 1996 (Act No. 43 of 1996)."

Is section 38 of the National Heritage Resources Act, 1999, applicable to the development?	**YES**	NO	
	UNCERTAIN		
If YES, explain:	A paleontology assessment has been carried out and submitted to the HWC with the NID and included in the final S24G assessment for consideration.		
Did/does the development impact on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999?	YES	**NO**	
	UNCERTAIN		
If YES, explain:			
Was any building or structure older than 60 years affected in any way?	YES	**NO**	UNCERTAIN
If YES, explain:	Agricultural activities on site between 1963 -2014; site clearing took place in 2020. Two buildings were cleared.		

Please Note:

If uncertain, the Department may request that specialist input be provided. If, yes, a copy of the Notice of Intent submitted to Heritage Western Cape must be submitted with this form.

9. COASTAL ASPECTS (SEAFRONT/SEA ENVIRONMENT)

(a) Is the site(s) located within any of the following areas? (highlight the appropriate boxes).
If the site or alternative site is closer than 100m to such an area, please provide the approximate distance in (m).

AREA	YES	NO	UNSURE	If "YES": Distance to nearest area (m)
An area within 100m of the high water mark of the sea	YES	NO	UNSURE	
An area within 100m of the high water mark of an estuary/lagoon	YES	NO	UNSURE	
An area within the littoral active zone	YES	NO	UNSURE	
An area in the coastal public property	YES	NO	UNSURE	
Major anthropogenic structures	YES	NO	UNSURE	
An area within a Coastal Protection Zone	YES	NO	UNSURE	
An area seaward of the coastal management line	YES	NO	UNSURE	
An area within the high risk zone (20 years)	YES	**NO**	UNSURE	
An area within the medium risk zone (50 years)	YES	**NO**	UNSURE	
An area within the low risk zone (100 years)	YES	**NO**	UNSURE	
An area below the 5m contour	YES	**NO**	UNSURE	
An area within 1km from the high water mark of the sea	YES	**NO**	UNSURE	
A rocky beach	YES	**NO**	UNSURE	

A sandy beach	YES	**NO**	UNSURE	

(b) If any of the answers to the above is "YES" or "UNSURE", specialist input may be requested by the Department. (The 1:50 000 scale Regional Geotechnical Maps prepared by Geological Survey may also be used).

10. REGIONAL PLANNING CONTEXT

Is the activity permitted in terms of the property's existing land use rights?	YES	**NO**	Please explain
The site is currently zoned as agricultural 1. A rezoning is required to mixed / light industrial use and uses must conform to the Mossel Bay Municipality Zoning Scheme By-Law, 2021. No activities requiring water use licensing, waste management licencing and Air emission licensing have been assessed and all workshop activities proposed for the site are to be accordingly restricted.			
Will the activity be in line with the following?			
Provincial Spatial Development Framework (PSDF)	**YES**	NO	Please explain
In terms of the WC PSDF, it is indicated that agricultural land must be protected. However, the site is located within the urban edge of Mossel Bay Municipality and falls within urban development area in terms of the MBM SDF / EMF, 2023.			

Figure 5: Site is located within urban edge (Mossel Bay Municipality, GIS viewer)

Figure 6: Site located within urban development area (adapted from MBM SDF / EMF, 2023)

Urban edge / Edge of Built environment for the area	**YES**	NO	Please explain
The site is located within the urban edge of Mossel Bay Municipality and falls within urban development area in terms of the MBM SDF / EMF, 2023.			
Integrated Development Plan of the Local Municipality	**YES**	NO	Please explain
The site is located within the urban edge of Mossel Bay Municipality and falls within urban development area in terms of the MBM SDF / EMF, 2023.			
Spatial Development Framework of the Local Municipality	**YES**	NO	Please explain
The site is located within the urban edge of Mossel Bay Municipality and falls within urban development area in terms of the MBM SDF / EMF, 2023.			
Approved Structure Plan of the Municipality	**YES**	NO	Please explain
The site is located within the urban edge of Mossel Bay Municipality and falls within urban development area in terms of the MBM SDF / EMF, 2023.			
An Environmental Management Framework (EMF) adopted by the Department	**YES**	NO	Please explain
The site is located within the urban edge of Mossel Bay Municipality and falls within urban development area in terms of the MBM SDF / EMF, 2023.			
Any other Plans	YES	NO	Please explain

SECTION D: NEED AND DESIRABILITY

Please Note: Before completing this section, first consult this Department's *Guideline on Need and Desirability* (March 2013) available on the Department's website (**http://www.capegateway.gov.za/eadp**).

1. Was the activity permitted in terms of the property's land use rights at the time of commencement?	YES	**NO**	Please explain
The site is currently zoned as agricultural 1. A rezoning is required to mixed / light industrial use and uses must conform to the Mossel Bay Municipality Zoning Scheme By-Law, 2021. No activities requiring water use licensing, waste management licencing and Air emission licensing have been assessed and all workshop activities proposed for the site are to be accordingly restricted.			

2. Was the activity in line with the following?			
(a) Provincial Spatial Development Framework (PSDF)	**YES**	NO	Please explain
(b) Urban edge / Edge of Built environment for the area	**YES**	NO	Please explain
Property is location outside the urban edge. Rezoning will be required from agricultural 1 to mixed / light use zone.			
(c) Integrated Development Plan and Spatial Development Framework of the Local Municipality (e.g. would the approval of this application have compromised the integrity of the existing approved and credible municipal IDP and SDF?).	YES	**NO**	Please explain
In terms of the IDP the site is located in an area indicated as urban growth. In terms of the SDF / EMF 2023 the site is located within the urban edge, and the northern section of the site is indicated as core 1 area. This section will not be developed due to the steep terrain in this area. The Proposed SDP is therefore in alignment with the IDP and SDF and EMF.			

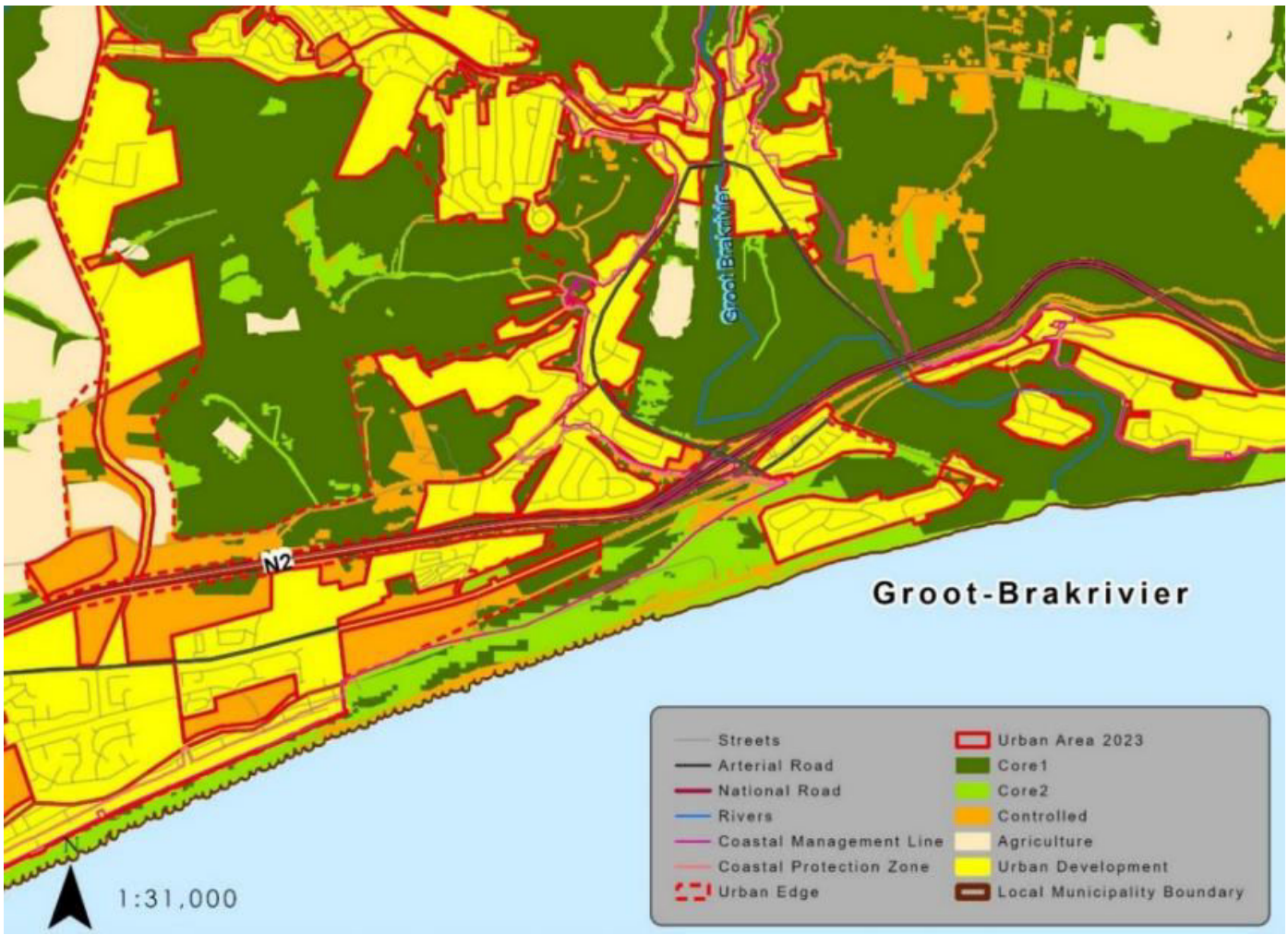

Figure 7: Groot-Brakrivier Urban Edge / Area (adapted from MBM SDF / Emf 2023)

(d) Approved Structure Plan of the Municipality	**YES**	NO	Please explain
In terms of the IDP the site is located in an area indicated as urban growth. In terms of the SDF / EMF 2023 the site is located within the urban edge and the norther section of the site is indicated as core 1 area. This section will not be developed due to the steep terrain in this area. The Proposed SDP is therefore in alignment with the IDP and SDF and EMF.			

(e) An Environmental Management Framework (EMF) adopted by the Department (e.g. Would the approval of this application have compromised the integrity of the existing environmental management priorities for the area and if so, can it be justified in terms of sustainability considerations?)	YES	**NO**	Please explain
In terms of the IDP the site is located in an area indicated as urban growth. In terms of the SDF / EMF 2023 the site is located within the urban edge and the norther section of the site is indicated as core 1 area. This section will not be developed due to the steep terrain in this area. The Proposed SDP is therefore in alignment with the IDP and SDF and EMF.			
(f) Any other Plans (e.g. Guide Plan)	YES	**NO**	Please explain
In terms of the IDP the site is located in an area indicated as urban growth. In terms of the SDF / EMF 2023 the site is located within the urban edge and the norther section of the site is indicated as core 1 area. This section will not be developed due to the steep terrain in this area. The Proposed SDP is therefore in alignment with the IDP and SDF and EMF. The current proposal is deemed to be acceptable and in line with land planning and conservation targets.			

3. Was the land use (associated with the activity for which rectification is sought) considered within the timeframe intended by the existing approved Spatial Development Framework (SDF) agreed to by the relevant environmental authority (i.e. was the development in line with the projects and programmes identified as priorities within the relevant IDP)?	**YES**	NO	Please explain
An application for environmental authorisation is required for the proposed development and the application will address impacts cause from the 2020 illegal clearing. Examples of strategies / actions / focus areas included in the IDP which are relevant to proposed activities on the site: *Spatial strategies* *STRATEGY 1 - Conserve and manage the natural environment in balance with the demands from urban growth and agricultural use.* *STRATEGY 3 - Facilitate opportunities for utilization of renewable energy* *STRATEGY 6 - Create a local economic base to provide sustainable employment opportunities* In terms of the IDP the site is located in an area indicated as urban growth. In terms of the SDF / EMF 2023 the site is located within the urban edge and the norther section of the site is indicated as core 1 area. This section will not be developed due to the steep terrain in this area. The Proposed SDP is therefore in alignment with the IDP and SDF and EMF. ***CONSTRUCTION AND PROPERTY DEVELOPMENT and balance between water supply infrastructure for agriculture and urban development*** *Upfront costs are high for developers (Bulk Infrastructure and Capital Contributions)* The site is considered to be an infill development as development will take place on a site between existing developed portions and therefore bulk municipal services and in place in close proximity to the site. Infill developments considered to be a positive economic benefit to the local municipality due to additional rates and taxes being generated without the burden of additional capital outlay which is expected to strengthen the financial sustainability of the municipality in both the short- and longer term.			

Energy requirements are highly recommended to be sourced using renewable energy sources such as solar power due to large roof coverage area; consideration of feedback to the grid could also be considered if feasible. Due to the large roof catchment area, rainwater storage tanks should also be placed in strategic roof catchment areas on the site and this water should be reused on site for water requirements and required filters, plumbing etc be provided. There will be minimum landscaping so this water could not be used for irrigation and should rather be used for drinking / washing / flushing and workshop associated requirements.

4. Should development, or if applicable, expansion of the town/area concerned in terms of this land use (associated with the activity being applied for) have occurred here when activities commenced?	YES	**NO**	Please explain
Site clearing should not have commenced in 2020 without environmental authorisation. However, the proposed development seems to be in line with land use and planning objectives of the Mossel Bay Municipality (within urban growth area) and construction of this will only take place once all required approvals are in place.			

5. Did the community/area need the activity and the associated land use concerned (was it a societal priority)? (This refers to the strategic as well as local level (e.g. development is a national priority, but within a specific local context it could be inappropriate.)	YES	NO	Please explain
Site clearing should not have commenced in 2020 without environmental authorisation. It is not known whether a brick making facility was a social priority for this land use. However, the proposed development (storage/ light industrial) seems to be in line with land use and planning objectives of the Mossel Bay Municipality (within urban growth area) and construction of this will only take place once all required approvals are in place. Storage facilities are low impact due to limited energy, water and sewage services. Light industrial activities are to conform with the relevant zoning bylaws and these activities are not to trigger any additional full licensing requirements in terms of NEMA, NEMAQA, DWS and NEMWA.			

6. Were the necessary services with adequate capacity available (at the time of commencement), or was additional capacity created to cater for the development? (Confirmation by the relevant Municipality in this regard must be attached to the Application Form / additional information as an **appendix**, where applicable.)	YES	NO	Please explain
The site is considered to be an infill development as development will take place on a site between existing developed portions and therefore bulk municipal services and in place in close proximity to the site. Infill developments considered to be a positive economic benefit to the local municipality due to additional rates and taxes being generated without the burden of additional capital outlay which is expected to strengthen the financial sustainability of the municipality in both the short- and longer term. Bulk services report and associated plans are provided in Appendix B.			

7. Is/was this development provided for in the infrastructure planning of the municipality, and if not what was/will the implication be on the infrastructure planning of the municipality (priority and placement of services and opportunity costs)? (Comment by the relevant Municipality in this regard must be attached to the Application Form / additional information as an **appendix**, where applicable.)	YES	**NO**	Please explain
In terms of the SDF / EMF 2023 the site is located within the urban edge and the northern section of the site is indicated as core 1 area. This section will not be developed due to the steep terrain in this area. The entire CBA in the NW is recommended to be avoided; the revised SDP (appendix D4) is deemed to be aligned with the IDP and SDF and EMF. The site is considered to be an infill development as development will take place on a site between existing developed portions and therefore bulk municipal services and in place in close proximity to the site. Infill developments considered to be a positive economic benefit to the local municipality due to additional rates and taxes being generated without the burden of additional capital outlay which is expected to strengthen the financial sustainability of the municipality in both the short- and longer term. Bulk services report and associated plans are provided in Appendix B2 and B3.			

8. Was this project part of a national programme to address an issue of national concern or importance?	YES	**NO**	Please explain

9. Did location factors favour this land use (associated with the activity applied for) at this place? (This relates to the contextualisation of the land use on this site within its broader context.)	**YES**	NO	Please explain
Site clearing should not have commenced in 2020 without environmental authorisation. It is not known whether a brick making facility was a social priority for this land use. However, the proposed development (storage/ light industrial) seems to be in line with land use and planning objectives of the Mossel Bay Municipality (within urban growth area) and construction of this will only take place once all required approvals are in place. The site is located within the urban edge and urban growth area, it is located south of the existing industrial area and the site is considered to be an infill development as development will take place on a site between existing developed portions and therefore bulk municipal services and in place in close proximity to the site. Infill developments considered to be a positive economic benefit to the local municipality due to additional rates and taxes being generated without the burden of additional capital outlay which is expected to strengthen the financial sustainability of the municipality in both the short- and longer term. The identified CBA on the northern western boundary of the site is also excluded from the proposed SDP due to steepness of this area.			

10. How did/does the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas (built and rural/natural environment)?	YES	**NO**	Please explain
The current proposal managed as per the EMPr fits into the natural and cultural environment. The identified CBA on the northern western boundary of the site is also excluded from the proposed SDP due to steepness of this area. Stormwater management is proposed for the site to mitigate impacts of stormwater generated by the approximate 16 ha roof / hard surface area. Energy requirements are highly recommended to be sourced using renewable energy sources such as solar power due to large roof coverage area; consideration of feedback to the grid could also be considered if feasible. Due to the large roof catchment area, rainwater storage tanks should also be placed in strategic roof catchment areas on the site and this water should be reused on site for water requirements and required filters, plumbing etc be provided. There will be minimum landscaping so this water could not be used for irrigation and should rather be used for drinking / washing / flushing and workshop associated requirements.			

11. How did/does the development impact on people's health and wellbeing (e.g. in terms of noise, odours, visual character and sense of place, etc.)?	YES	**NO**	Please explain
Positive social impacts are identified as a result of operations No health impacts are expected from the proposed storage / light industrial activities with implementation of the EMPr.			

12. Did/does the proposed activity or the land use associated with the activity applied for, result in unacceptable opportunity costs?	YES	**NO**	Please explain

13. What were the cumulative impacts (positive and negative) of the land use associated with the activity applied for?	YES	NO	Please explain
All impacts are provided in Section F of this report			

14. Is/was the development the best practicable environmental option for this land/site?	**YES**	NO	Please explain
The proposed SDP is considered to be an acceptable proposal for the site as it located between the WWTw in the west and existing restaurant in the east, the storage facilities could therefore be an acceptable fill development. The existing industrial area is located south of the site. Planned mixed use development is also noted to be planned south of the site on Erf 998 Tergniet and the Remainder of Portion 5 of the Farm Zandhoogte 139; the related zoning motivational application compiled by JV Town Planners April 2024 indicates business, community, mixed use, residential II zones planned for this site. Installation of PV Solar Plant and Battery Energy Storage Systems is also proposed by the MBM on the property located immediately west of Re/139 (site sensitivity Verification Report, SES, 2025); this site is reported to be approximately 14.5 ha and zoned Agricultural 1 . The site is traversed by Sorgfontein and Zandhoogte roads and is considered to be an infill development which is			

considered to be positive to the local municipality due to additional rates and taxes being generated without the burden of additional capital outlay as bulk service connections are in place.

15. What are/were the benefits to society in general and to the local communities?	Please explain
Employment opportunities will be created; with short term opportunities and skills development created during the construction phase (up to 5 years) and the creation of local economic opportunities as a result of materials, products and services that will be required for construction. Long term opportunities will be created by the light industrial workshops and operational management requirements. The new landowner would like to address the illegal commencement of clearing which took place through the S24G application process. No activities by the new landowner have taken place.	

16. Any other need and desirability considerations related to the activity?	Please explain
Positive to the local municipality due to additional rates and taxes being generated without the burden of additional capital outlay as bulk service connections are in place.	

17. Please describe how the general objectives of Integrated Environmental Management as set out in section 23 of NEMA were taken into account:

The following approvals are required:

- Environmental Authorisation in terms of National Environmental Management Act (Act 107 of 1998) for listed activities included in this S24 G application
- Permits for disturbance / removal of any protected trees in terms of the National Forestry Act (to be confirmed during search prior to construction)
- Permits for removal of any protected fauna or flora species in terms of the national Environmental Management: Biodiversity Act (to be confirmed during search prior to construction)
- Permits for removal of any species as identified in the Provincial Nature Conservation Ordinance / Western Cape Nature conservation ordinance, 2000 ((to be confirmed during search prior to construction)
- National Veld and Forest Fire Act (Act 101 Of 1998) - Development of fire management practices to prevent and combat fires and legal duty and responsibility to ensure that veld fires do not break out on their property, and to take preventative measures to minimize the risk of fires spreading. Due to the fire risk inherent for any fire driven ecosystem (fynbos), it is important that this application be reviewed by the Southern Cape Fire Protection Association (SCFPA) so they can provide comments on management recommendations. It is recommended that the landowner becomes a member of the SCFPA.
- General authorisation for development within 500 meters of wetland in terms of Section 21 c and I of the National Water Act (act 36 of 1998)

The proposed activities will not require the following:

- Waste management license in term of the National Environmental Management: Waste Act 59 Of 2008
- Air emission license in terms of the NEM: Air Quality Act No. 39 of 2004

18. Please describe how the **principles of environmental management** as set out in section 2 of NEMA were taken into account:	
Principles:	

(1) The principles set out in this section apply throughout the Republic to the actions of all organs of state that may significantly affect the environment and- (a) shall apply alongside all other appropriate and relevant considerations, including the State's responsibility to respect, protect, promote and fulfil the social and economic rights in Chapter 2 of the Constitution and in particular the basic needs of categories of persons disadvantaged by unfair discrimination; (b) serve as the general framework within which environmental management and implementation plans must be formulated; (c) serve as guidelines by reference to which any organ of state must exercise any function when taking any decision in terms of this Act or any statutory provision concerning the protection of the environment; (d) serve as principles by reference to which a conciliator appointed under this Act must make recommendations; and (e) guide the interpretation, administration and implementation of this Act, and any other law concerned with the protection or management of the environment.	Referred to in assessment and mitigation.
(2) Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably.	Social impacts are addressed. Public participation
(3) Development must be socially, environmentally and economically sustainable.	Social, environmental and economic aspects have been addressed
(4)	
(a) Sustainable development requires the consideration of all relevant factors including 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;	Terrestrial and aquatic ecosystems are considered
ii) that pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied;	Impacts have been identified, and mitigation measures are provided
(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;	Terrestrial and aquatic ecosystems are considered
(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;	Impacts have been identified, and mitigation measures are provided
(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;	Overview of energy use is provided; and recommendations provided.
(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;	Overview of hydrology, aquatic and terrestrial ecosystems provided; overview of water use an energy use addressed and recommendations provided.
(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	Relevant information has been provided to inform decision making
(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	Impact assessment and mitigation measures provided
(b) Environmental management must be integrated, acknowledging that all elements of the environment are linked and interrelated, and it must take into account the effects of decisions on all aspects of the environment and all people in the environment by pursuing the selection of the best practicable environmental option.	EMPr is provided; best practices are encouraged.
(c) Environmental justice must be pursued 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	Not identified
(d) Equitable access to environmental resources, benefits and services to meet basic human needs and ensure human well-being must be pursued and special measures may be taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination.	Overview of water use an energy use addressed and recommendations provided.
(e) Responsibility for the environmental health and safety consequences of a policy, programme, project, product, process, service or activity exists throughout its life cycle.	Indication of competent authorities provided; EMPr provided with indication of responsibility.

(f) The participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured.	Public participation in terms of Section 41 of the NEMA EIA regulations is being carried out
(g) Decisions must take into account the interests, needs and values of all interested and affected parties, and this includes recognising all forms of knowledge, including traditional and ordinary knowledge.	And overview of past and proposed activities provided
(h) Community wellbeing and empowerment must be promoted through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means.	Environmental awareness and education is noted and addressed
(i) The social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment.	Social, environmental and economic impacts have been considered
(j) The right of workers to refuse work that is harmful to human health or the environment and to be informed of dangers must be respected and protected.	An EMPr is provided and includes education and awareness to the public, managers and employees
(k) Decisions must be taken in an open and transparent manner, and access to information must be provided in accordance with the law.	Public participation in terms of Section 41 of the NEMA EIA regulations is being carried out
(l) There must be intergovernmental co-ordination and harmonisation of policies, legislation and actions relating to the environment.	Indication of relevant approval and competent authorities provided;
(m) Actual or potential conflicts of interest between organs of state should be resolved through conflict resolution procedures.	Proposal seems to be aligned to national, provincial and local strategic development and land use planning.
(n) Global and international responsibilities relating to the environment must be discharged in the national interest.	Proposal seems to be aligned to international, national, provincial and local strategic development and land use planning. i.e. prevention of urban sprawl and development on existing degraded areas.
(o) The environment is held in public trust for the people, the beneficial use of environmental resources must serve the public interest and the environment must be protected as the people's common heritage.	Proposal seems to be aligned to international, national, provincial and local strategic development and land use planning. i.e. prevention of urban sprawl and development on existing degraded areas. Draft application will be made available for review and comments by surrounding landowners / occupiers,, organs of states and stakeholders.
(p) 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 must be paid for by those responsible for harming the environment.	No further development by the new landowner has taken place. The site is considered to be degraded by previous farming activities. All approvals and requirements will be in place before the new landowner commences to construction phase.
(q) The vital role of women and youth in environmental management and development must be recognised and their full participation therein must be promoted.	Draft application will be made available for review and comments by surrounding landowners / occupiers, organs of states and stakeholders.

(r) 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	No sensitive ecosystems are considered to be on the site with exception of the north western CBA section which will be retained as this area is not feasible to develop on due to steepness. The farm dam on the site is planned to be incorporated into the development as pond form stormwater management.

SECTION E: ALTERNATIVES

Please Note: Before completing this section, first consult this Department's *Guideline on Alternatives* (March 2013) available on the Department's website (**http://www.capegateway.gov.za/eadp**).

"Alternatives", in relation to an activity, means different means of meeting the general purposes and requirements of the activity, which may include alternatives to –

(a) the property on which, or location where, it is to undertake the activity/the activity was undertaken;
(b) the type of activity to be undertaken;
(c) the design or layout of the activity;
(d) the technology to be used in the activity;
(e) the operational aspects of the activity; and
(f) the option of not implementing the activity.

The NEMA prescribes that the procedures for the investigation, assessment and communication of the (potential) consequences or impacts of activities on the environment must, *inter alia*, with respect to every application for environmental authorisation –

- ensure that the general objectives of integrated environmental management laid down in NEMA and the National Environmental Management Principles set out in NEMA are taken into account; and (where applicable)
- include an investigation of the potential consequences or impacts of the alternatives to the activity on the environment and assessment of the significance of those potential consequences or impacts, including the option of not implementing the activity.

The general objective of integrated environmental management is, *inter alia*, to "*identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage, the risks and consequences and alternatives and options for mitigation of activities, with a view to minimising negative impacts, maximising benefits, and promoting compliance with the principles of environmental management*" set out in NEMA.

1. In the sections below, please provide a description of any considered alternatives and alternatives that were found to be feasible and reasonable.

Please note:

- Detailed written proof of the investigation of alternatives must be provided. If no reasonable or feasible alternative exists, a motivation must be provided.
- Alternatives considered for a Section 24G application are used to determine if the development was the best practicable alternative (environmentally, socially and economically) for the site or property.
- In respect of a section 24 application, the option of not implementing the activity ("no-go"), includes the option of ceasing the activity, not implementing continuation of the activity, refusal of the commenced activity and complete rehabilitation of the affected site.

(a) Property and location/site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

RE/139 Zandhoogte is the only site assessed. No site alternatives have been proposed or are available for this development in Groot Brak.

(b) Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

The proposed light industrial development is considered to be an acceptable land use proposal for the site.

The site is considered an infill development as bulk services and connection are in place in close proximity and access roads are already in place.

Recommendations for the site development plan includes:

- Move development out of northern artificial pond and retain pond for stormwater management on the site.
- On the western section of the development; It is recommended to swap the storage facilities planned on the south west with the light industrial workshop planned against the north eastern CBA area. (if feasible form bulk services perspective)
- Incorporate solar power into the development plan due to large roof area planned (lettable area is provided as estimated 4 ha in the SDP)
- Incorporate rain water tanks into development and augment water supply for drinking, flushing washing and workshop requirements. Include suitable plumbing and filters in the proposal.
- Place locally growing indigenous vegetation (representative of historical vegetation types) between the landowners and the development (within the 5-meter buffer area). This can provide effective noise and visual impact mitigation.

(c) Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

Recommendations for the site development plan includes:

- Move development out of northern artificial pond and retain pond for stormwater management on the site.
- On the western section of the development; It is recommended to swap the storage facilities planned on the south west with the light industrial workshop planned against the north eastern CBA area. (if feasible from bulk services perspective)
- Incorporate solar power into the development plan due to large roof area planned (lettable area is provided as estimated 4 ha in the SDP)
- Incorporate rain water tanks into development and augment water supply for drinking, flushing washing and workshop requirements. Include suitable plumbing and filters in the proposal.
- Place locally growing indigenous vegetation (representative of historical vegetation types) between the landowners and the development (within the 5-meter buffer area). This can provide effective noise and visual impact mitigation.

(d) Technology alternatives (e.g. to reduce resource demand and resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts or detailed motivation if no reasonable or feasible alternatives exist:

Recommendations for the site development plan includes:

- Move development out of northern artificial pond and retain pond for stormwater management on the site.
- On the western section of the development; It is recommended to swap the storage facilities planned on the south west with the light industrial workshop planned against the north eastern CBA area. (if feasible from bulk services perspective)
- Incorporate solar power into the development plan due to large roof area planned (lettable area is provided as estimated 4 ha in the SDP)
- Incorporate rain water tanks into development and augment water supply for drinking, flushing washing and workshop requirements. Include suitable plumbing and filters in the proposal.
- Place locally growing indigenous vegetation (representative of historical vegetation types) between the landowners and the development (within the 5-meter buffer area). This can provide effective noise and visual impact mitigation.

(e) Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

Recommendations for the site development plan includes:

- Incorporate solar power into the development plan due to large roof area planned (lettable area is provided as estimated 4 ha in the SDP)
- Incorporate rain water tanks into development and augment water supply for drinking, flushing washing and workshop requirements. Include suitable plumbing and filters in the proposal.
- Place locally growing indigenous vegetation (representative of historical vegetation types) between the landowners and the development (within the 5-meter buffer area). This can provide effective noise and visual impact mitigation.

(f) The option of ceasing the activity (the refusal of the activity(ies) and/or rehabilitation of the site):

No activities have continued since 2020. The new landowner is proposed a mixed / light industrial land use for the site.

The impacts of the previously 2.5 ha clearing has been assessed; the impacts of the proposed site development plan has been assessed, and recommendations have been provided.

The land use proposed by the new landowner is considered to be acceptable for the site and in line with planning objectives of the MBM.

(g) Any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

The land use proposed by the new landowner is considered to be acceptable for the site and in line with planning objective of the MBM.

Recommendations for the site development plan includes:

- Move development out of northern artificial pond and retain pond for stormwater management on the site.
- On the western section of the development; It is recommended to swap the storage facilities planned on the south west with the light industrial workshop planned against the north eastern CBA area. (if feasible from bulk services perspective)
- Incorporate solar power into the development plan due to large roof area planned (lettable area is provided as estimated 4 ha in the SDP)
- Incorporate rain water tanks into development and augment water supply for drinking, flushing washing and workshop requirements. Include suitable plumbing and filters in the proposal.
- Place locally growing indigenous vegetation (representative of historical vegetation types) between the landowners and the development (within the 5-meter buffer area). This can provide effective noise and visual impact mitigation.

(h) Please provide a summary of the alternatives investigated and the outcomes of such investigation:

Please note: If no feasible and reasonable alternatives exist, the description and proof of the investigation of alternatives, together with motivation of why no feasible or reasonable alternatives exist, must be provided.

The only site assessed for the proposed activity is RE/ 139 Zandhoogte.

Past use (farming) and proposed activities (mixed / light industrial) have been assessed. The only alternative assessed is the proposed SDP. Recommendations are provided for the final SDP and associated plans (SWMP).

Impacts have been assessed with and without mitigation measures with the recommendations being the mitigation for the site as per relevant impact.

The no go alternative is assessed based on the baseline conditions and impacts that are expected to occur without the development going ahead.

SECTION F: IMPACT ASSESSMENT, MANAGEMENT, MITIGATION AND MONITORING MEASURES

Please note, the impacts identified below refer to general impacts commonly associated with development activities. The list below is not exhaustive and may need to be supplemented. Where required, please append the information on any additional impacts to this application.
Please note: The information in this section must be duplicated for all the feasible and reasonable alternatives (where relevant).

1. **PLEASE DESCRIBE THE MANNER IN WHICH THE DEVELOPMENT HAS IMPACTED ON THE FOLLOWING ASPECTS:**

(A) GEOGRAPHICAL AND PHYSICAL ASPECTS:

The site has a moderate to steep gradient. The site development plan has avoided steep area with a gradient of more than 1:5 ha. This area also coincides with identified CBA on the site and is not proposed for development. The site has been transformed due to farming activities; the clearing of the 2.5 ha in the WE corner of the site consisted of degraded vegetation (no longer representative of historical indigenous vegetation and not included within CBA) and two dwellings and a short access road. This area will be levelled as required for placement of the industrial workshops. The raining of the site will also be levelled as required and sewage piping will follow natural gradients to ensure a gravitation low energy system for the site. The existing farm dam will be retained as one of the stormwater ponds and a second pond will also be created. It is recommended that rainwater tanks and solar power be incorporated into the final SDP for the site. The 5-meter buffer is recommended to be consist of indigenous vegetation (i.e. remain as is and not cleared as the majority of vegetation already consist of indigenous species representative of the area e.g. *Osteospermum moniliferum*) . Additional vegetation rescued during site clearing can be added to this area and the SWM areas. Steep areas to be considered as no go areas and not to be disturbed with exception of any clearing of AIS which may be required, and this should only be done using hand tools and no heavy machinery at all.

(B) BIOLOGICAL ASPECTS:

Has the development impacted on critical biodiversity areas (CBAs) or ecological support areas (ESAs)?	YES	**NO**
If yes, please describe:		
The site has been transformed due to farming activities; the clearing of the 2.5 ha in the WE corner of the site consisted of degraded vegetation (no longer representative of historical indigenous vegetation and not included within CBA) and two dwellings and a short access road.		
Has the development impacted on terrestrial vegetation, or aquatic ecosystems (wetlands, estuaries or the coastline)?	**YES**	**NO**
If yes, please describe:		
The site has been transformed due to farming activities; the clearing of the 2.5 ha in the WE corner of the site consisted of degraded vegetation (no longer representative of historical indigenous vegetation and not included within CBA) and two dwellings and a short access road. Indigenous vegetation was cleared but this has recovered naturally on this previously disturbed area.		
Has the development impacted on any populations of threatened plant or animal species, and/or on any habitat that may contain a unique signature of plant or animal species?	**YES**	**NO**
If yes, please describe:		

The site has been transformed due to farming activities; the clearing of the 2.5 ha in the WE corner of the site consisted of degraded vegetation (no longer representative of historical indigenous vegetation and not included within CBA) and two dwellings and a short access road. Indigenous vegetation was cleared but this has recovered naturally on this previously disturbed area. Low impacts on fauna are expected to have occurred during 2.5 ha clearing, with most fast-moving mammals and reptiles moving out of the areas due to presence of humans and associated noise. It is unclear if nesting site may have been disturbed or any fauna harmed due to non-compliance and no related audit reports available for construction activities.

With regards to the proposed light industrial / mixed use development, the project area intersects with the distribution range of twenty-seven (27) faunal SCC. Two (2) mammal species and one (1) bird species are expected to have a high likelihood of occurrence within the project area. If present, the African Striped Weasel (NT) and Denham's bustard (VU) and other small fauna will likely move away from the project area when construction begins, and the development will result in a small loss of each species' habitat. Construction activities may result in the mortality of individuals of the Fynbos Golden Mole and will result in the loss of approximately 0.07% of already degraded habitat within the AOO for this species. Search and rescue, associated permits and reporting of incidences will be required for construction phase.

Please describe the manner in which any other biological aspects were impacted:

Poor site management practices often leads to the following impacts:

- Increase in AIS due to disturbed bare soil areas
- Blanket clearing due to no site plan prepared aligned to a EMPr
- Increase in erosion from wind resulting in loss of soil and dust impacts
- Increase in erosion from rain resulting in loss of soil and potential contamination of surroundings if stormwater water contaminated by incorrect management of waste and hazardous materials
- Loss of potential flora and fauna SCC due to no search and rescue carried out and no permits in place and no incident reporting in place
- Potential contamination by incorrect management of waste and hazardous materials
- Visual impact due to poor housekeeping
- Incorrect waste management and potential dumping / burning of waste resulting
- Potential loss of paleontology resources as site is within a high sensitive paleontology area and no chance finds procedure or ECO in place to monitor excavations

The new landowner aims to ensure all required approval are in place prior to construction phase which will entail an approved EMPr in place which will need to be compiled to ensure effective environmental management of the site.

(C) SOCIO-ECONOMIC ASPECTS:

What was the capital value of the activity on completion?	Not yet developed; S24G due to illegal 2.5 ha clearing by previous landowner.	
What is the (expected) yearly income or contribution to the economy that is/will be generated by or as a result of the activity?	R unknown	
Has/will the activity have contributed to service infrastructure?	YES	**NO**
How many new employment opportunities were/will be created in the construction phase of the activity?	Estimated 10	
What was the value of the employment opportunities during the construction phase?	R unknown	
What percentage of this accrued to previously disadvantaged individuals?	%	
How was this ensured and monitored (please explain):		
How many permanent new employment opportunities were/will be created during the operational phase of the activity?	Estimated 20	
What is the current/expected value of the employment opportunities during the first 10 years?	R unknown	

What percentage of this accrued/will accrue to previously disadvantaged individuals?	%
How was/will this be ensured and monitored (please explain):	
Any other information related to the manner in which the socio-economic aspects was/will be impacted:	

(D) CULTURAL AND HISTORIC ASPECTS:

The DFFE screening tool report generated for the site (Appendix M) shows a low sensitivity for heritage and archaeology. No heritage structures will be / have been disturbed by illegal clearing or the proposed activity.
A High sensitivity is indicated in the screening tool report for palaeontological resources. A paleontology imapct assessment has been carried out (Appendix H3). The site occurs on a site underlain by the Enon formation of Uitenhage Group (onshore post-Karoo Mesozoic deposit). The Enon Formation (Very High Sensitivity) was formed during the breakup of Gondwana during a time of intense erosion of the rocks that constitute the Cape Fold Belt (Gresse et al. 1992).
Lithology is comprised of: Conglomerate, subordinate sandstone, mudstone
Palaeontology resources include: Silicified wood, charcoal fragments, abraded bone fragments, two theropod dinosaur teeth
Fossils in this formation are rare. It is unlikely but possible that this area could contain valuable fossil material
As seen at the small quarry on site, the Enon Formation in this area is deeply weathered, this decreases the chance of finding fossil material even more.
The Chance Fossil Find Procedure is to be followed, in the unlikely event that fossil material is found. If no chance find procedure is implemented the impact on palaeontological resources is considered to be a negative impact of low significance.

2. WASTE AND EMISSIONS

(A) WASTE (INCLUDING EFFLUENT) MANAGEMENT

Did the activity produce waste (including rubble) during the construction phase?	**YES**	NO
If yes, indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type?	unknown m^3	
The following stream are assumed to have been created by previous clearing: • Vegetation clearing (consist of indigenous and alien vegetation) • Building Rubble and construction waste The following stream are anticipated to be created by the proposed light industrial development: • Vegetation clearing (consist of indigenous and alien vegetation) • Building Rubble and construction waste • General waste streams – metals, plastics, papers, tins, glass, food waste / some paints • Hazardous waste – batteries, electrical, oils / petrol / diesel / some paints / contaminated wash water • Sewage waste – portable toilets during construction phase. Refer to Waste management in EMPr – Appendix I		

Does the activity produce waste during its operational phase?	**YES**	NO
If yes, indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type? The following stream are anticipated to be created by the proposed light industrial development: • General waste streams – metals, plastics, papers, tins, glass, food waste / some paints	Unknown m^3	

• Hazardous waste – batteries, electrical, oils / petrol / diesel / some paints / contaminated wash water Refer to Waste management in EMPr – Appendix I	

Where and how was/will the waste be treated / disposed of (describe)?
Sewage waste – portable toilets during construction phase. Operational phase sewage waste – Groot Brak WWTW General waste streams – metals, plastics, papers, tins, glass, food waste / some paints Hazardous waste – batteries, electrical, oils / petrol / diesel / some paints / contaminated wash water Waste management will be required to follow the waste management hierarchy at all times and waste sorting facilities must be provided for workshop areas. All local recycling options must be considered and if available, implemented for the lifetime of operations. If recycling of general waste is permitted in the land use zoning, then a recycling area is encouraged to be developed on the site to service Groot Brak as limited options are currently available. This can follow successful models such as ReTrade in the NMBM. (https://www.retradeproject.co.za/). Refer to Waste management in EMPr – Appendix I

Has the municipality or relevant authority confirmed that sufficient capacity exists for treating / disposing of the waste (to be) generated by this activity(ies)? If yes, provide written confirmation from Municipality or relevant authority	**YES**	NO
Does/will the activity produce waste that is/will be treated and/or disposed of at another facility other than into a municipal waste stream?	YES	**NO**
If yes, has this facility confirmed that sufficient capacity exists for treating / disposing of the waste (to be) generated by this activity(ies)? Provide written confirmation from the facility and provide the following particulars of the facility:	YES	NO
Does the facility have an operating license? (If yes, please attach a copy of the license.)	YES	NO

Facility name:	
Contact person:	
Postal address:	
	Postal code:
Telephone:	Cell:
E-mail:	Fax:

Describe the measures that were/will be taken to reduce, reuse or recycle waste:
Waste management will be required to follow the waste management hierarchy at all times and waste sorting facilities must be provided for workshop areas. All local recycling options must be considered and if available, implemented for the lifetime of operations. If recycling of general waste is permitted in the land use zoning, then a recycling area is encouraged to be developed on the site to service Groot Brak as limited options are currently available. This can follow successful models such as ReTrade in the NMBM. (https://www.retradeproject.co.za/). Disposal at a licensed general / hazardous waste site for all general / hazardous waste generated during construction and operational phase is required. Proof of disposal will be required to be kept for audit purposes to ensure the estimated waste generated has been legally disposed and not dumped ./ burned illegally. Disposal of general waste must be a last resort after all options have been exhausted. Refer to Waste management in EMPr – Appendix I

(B) EMISSIONS INTO THE ATMOSPHERE

Does/will the activity produce emissions that will be disposed of into the atmosphere?	YES	NO
If yes, does it require approval in terms of relevant legislation?	YES	**NO**
Describe the emissions in terms of type and concentration and how it is/will be treated/mitigated:		

- Dust can be expected during construction phase.
- No activities requiring an air emissions license will be developed on the site.
- Refer to Appendix I - EMPr.

3. WATER USE

Please indicate the source(s) of water for the activity by ticking the appropriate boxes)

Municipal	Water board	Groundwater	River, Stream, Dam or Lake	Other	The activity did/does/will not use water

If water was extracted from a groundwater source, river, stream, dam, lake or any other natural feature, please indicate the volume that was extracted per month:	m^3

Please provide proof of assurance of water supply (e.g. Letter of confirmation from municipality / water user associations, yield of borehole)		
Did/does the activity require a water use permit / license from DWA?	YES	**NO**
If yes, please submit a certified copy of the water use permit/license or submit the necessary application to Department of Water Affairs and attach proof thereof to this application, whichever is applicable.		
Describe the measures that were/ will be taken to reduce water demand, and measures to reuse or recycle water:		

It is unclear what measures were taken by 2020 landowner (Ideal Trading) or the previous landowner.

The proposed development is estimated to require 56 kl per day; Bulk water is available for this proposed development. The bulk connection point for the western two portions will be from the existing 150mm municipal line along Sandhoogte Road (west).

The bulk connection point for the eastern two portions will be from the existing 200mm municipal line along Sandhoogte Road (east).

The locality of these bulk water lines and connection points in relation to the proposed development site are indicated in the preliminary design drawings provided in Appendix B.

BGCMA officials will be sent a copy of this draft application and accompanying appendices for comment and review.

4. POWER SUPPLY

Please indicate the source of power supply e.g. Municipality / Eskom / Renewable energy source

The bulk electrical supply will be supplied from the Mossel Bay Municipality's (MBM) Midbrak 11/11kV Substation, via the existing 11kV, 120mm2 copper underground cable. This cable is currently installed along the Sandhoogte Road, between the Grootbrak WWTW's minisub and the Sandhoogte Booster Pump Station. The cable has a current-carrying capacity of 4.75 MVA (@11kV). Furthermore, it has been confirmed with the MBM's Electrical Personnel that this feeder is currently very lightly loaded and does have spare capacity of at least 1 MVA available, which could be utilized for the planned development.

Due to the fact that the exact nature (and electrical demand) of the light industries' occupants was not known at the time of the development of this report, some assumptions had to be made. The estimated diversified load of the total development, in line with the above design criteria, is estimated to be 613 kVA. For this reason, it is recommended that 630kVA minisub be supplied for development.

A number of energy saving, and green building design measures are proposed to be incorporated into this

development. These measures are being investigated and will be finalized during the detail design phase and will be communicated to the Client and the Mossel Bay Municipality for final approval.
The bulk services report proposes the following:
An internal low voltage reticulation network will be provided from the 630kVA minisub to standard street-front kiosks (6/9-way) for individual loads and all cabling will be installed underground.
Decorative and energy saving street lighting will be provided for the development and will be supplied from the minisub's street lighting compartment via dedicated streetlight circuit breakers, controlled by day-night switches.
All design parameters for internal reticulation will be in accordance with the standard specifications of the Mossel Bay Municipality.

If power supply is not available, where will power be sourced from?

The bulk electrical supply will be supplied from the Mossel Bay Municipality.

Solar panels are recommended to be incorporated into the final SDP due to large roof structure area on this site. It is also noted that the MBM is proposing Solar power on the adjacent site and discussions between relevant engineers are encouraged to be held.

5. ENERGY EFFICIENCY

Describe the design measures, if any, that have been taken to ensure that the activity is energy efficient:

The bulk electrical supply will be supplied from the Mossel Bay Municipality's (MBM) Midbrak 11/11kV Substation, via the existing 11kV, 120mm2 copper underground cable. This cable is currently installed along the Sandhoogte Road, between the Grootbrak WWTW's minisub and the Sandhoogte Booster Pump Station. The cable has a current-carrying capacity of 4.75 MVA (@11kV). Furthermore, it has been confirmed with the MBM's Electrical Personnel that this feeder is currently very lightly loaded and does have spare capacity of at least 1 MVA available, which could be utilized for the planned development.
Due to the fact that the exact nature (and electrical demand) of the light industries' occupants was not known at the time of the development of this report, some assumptions had to be made. The estimated diversified load of the total development, in line with the above design criteria, is estimated to be 613 kVA. For this reason, it is recommended that 630kVA minisub be supplied for development.
A number of energy saving, and green building design measures are proposed to be incorporated into this development. These measures are being investigated and will be finalized during the detail design phase and will be communicated to the Client and the Mossel Bay Municipality for final approval.
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All design parameters for internal reticulation will be in accordance with the standard specifications of the Mossel Bay Municipality.

Describe how alternative energy sources have been taken into account or been built into the design of the activity, if any:

A number of energy saving, and green building design measures are proposed to be incorporated into this development. These measures are being investigated and will be finalized during the detail design phase and will be communicated to the Client and the Mossel Bay Municipality for final approval.
Solar panels are recommended to be incorporated into the final SDP due to large roof structure area on this site. It is also noted that the MBM is proposing Solar power on the adjacent site and discussions between relevant engineers are encouraged to be held.

6. DESCRIPTION AND ASSESSMENT OF THE SIGNIFICANCE OF IMPACTS PRIOR TO AND AFTER MITIGATION

Please note:

- While sections are provided for impacts on certain aspects of the environment and certain impacts, the sections should also be copied and completed for all other impacts.
- Mitigation measures that were implemented and mitigation measures that are to be implemented should be clearly distinguished.

(a) **Impacts that resulted from the planning, design and construction phases (briefly describe and compare the impacts (as appropriate), significance rating of impacts, proposed mitigation and significance rating of impacts after mitigation that occurred as a result of the planning, design and construction phases.**

Impacts on geographical and physical aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Impact on biological aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Impacts on socio-economic aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of	

resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Impacts on cultural-historical aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Noise impacts:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Visual impacts / Sense of Place:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

(b) **Impacts that result from the operational phase (briefly describe and compare impacts (as appropriate), significance rating of impacts, proposed mitigation and significance rating of impacts after mitigation that are likely to occur as a result of the operational phase.**

Impacts on the geographical and physical aspects:

Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Impact on biological aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Impacts on the socio-economic aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Impacts on the cultural-historical aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Noise impacts:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	

Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Visual impacts / Sense of Place:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

(c) Impacts that may result from the decommissioning and closure phase (briefly describe and compare the potential impacts (as appropriate), significance rating of impacts, proposed mitigation and significance rating of impacts after mitigation that are likely to occur as a result of the decommissioning and closure phase.

Potential impacts on the geographical and physical aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential impact on biological aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential impacts on the socio-economic aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	

Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential impacts on the cultural-historical aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential noise impacts:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential visual impacts:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

(d) Any other impacts:

Potential impact:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation	

(Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Please note: If any of the above information is not available, specialist input may be requested.

6.1 IMPACT ASSESSMENT - PLANNING AND DESIGN PHASE

PLANNING PHASE

Correct planning will assist in ensuring that measures are in place to avoid and prevent significant impacts (environmental, social and economic) and ensure that measures are in place to ensure effective operations of the site and associated workshop facilities and supporting bulk service infrastructure. Commencement of construction prior to receiving required approvals can result in project delays. Many approvals will have conditions, and all preconstruction conditions must be in place prior to the start of construction. Correct budget allocation to ensure effective environmental management planning must be carried out during the planning phase. With correct planning and budget allocation, with mitigation impacts can be expected for the proposed mixed / light industrial development.

Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops
Layout	Proposed SDPs and bulk services (Appendix B)
Phase	Planning and Design
Aspect	Management
Nature of Impact	Direct – Project delays and economic consequences
Description of Impact	Commencement prior to required approvals in place can lead to delays in project and economic loss; insufficient budget allocation to environmental management can result in impacts before mitigation.

Impact Rating

Impact Status	**Negative Impact**		**Negligible**	
	Without mitigation		With mitigation	
Spatial	Local	3	Site	2
Duration	Short to medium	3	Permanent	5
Frequency	Rarely	1	Rarely	1
Intensity	Medium High	4	Low	1
Severity	Medium	8	Negligible	7
Consequence	Medium	11	Negligible	9
Probability	Anticipated	6	Slim	1
Impact Significance	**Medium High**	**17**	**Low**	**10**
Mitigation	Difficult – previous land owner cleared without EA and before mitigation impacts result			
Confidence	High			
Reversibility	Difficult – can proceed to attain EA via NEMA S24G process however delays have already resulted			

Nature of Impact	**Direct**
Description of Impact	Fauna, Flora, Water, Soil - Poor environmental management planning and / or lack of budget for environmental management will result in unmitigated impacts.

Impact Rating	As per impact ratings for construction and operational impact before mitigation and after mitigation. Incorrect planning and will lead to before mitigation impacts.
Mitigation Measures	**Planning – Planning Team** • Ensure all approvals in place • Ensure measures have been taken and budget allocated to ensure that all preconstruction requirements are in place prior to construction • Ensure measures have been taken and budget allocated to ensure that an Environmental Management File is put in place to contain all documents / report which pertain to the relevant conditions of the planning, construction, and operational phases (e.g. EA, permits, waste disposal certificates, training registers, incident registers etc.) • Ensure layouts, designs, and accompanying drawings are approved by competent engineer • All preconstruction requirements included as conditions of the Environmental Authorisation (if attained) to be met. • All preconstruction requirements included as conditions in any other license, authorisation, approval etc. required for the site to be met. • Method statements for construction phase are to be compiled by the project team and be aligned to mitigation measures and conditions of the Environmental Authorisation (if attained) • Construction team should include a suitably qualified Environmental site officer to assist with daily environmental management on site and compliance with the CEMP and conditions of the EA (if attained) • Appoint a suitably qualified external environmental control officer to ensure environmental management requirements are met by carrying out monthly external audits. • Operational management plans are to be aligned to mitigation measures and conditions of the Environmental Authorisation (if attained)

6.2 IMPACT ASSESSMENT - CONSTRUCTION AND OPERATIONAL PHASE

HERITAGE ARCHAEOLOGY AND PALEONTOLOGY

The DFFE screening tool report indicates a very high sensitivity for palaeontological, and low sensitivity for archaeological and cultural heritage. A palaeontology assessment has been carried out for this site and a NID and accompanying assessment submitted to Western Cape Heritage (Appendix H4)
The site occurs on a site underlain by the Enon formation of Uitenhage Group (onshore post-Karoo Mesozoic deposit)
Lithology is comprised of: Conglomerate, subordinate sandstone, mudstone.
Palaeontology resources include Silicified wood, charcoal fragments, abraded bone fragments, two theropod dinosaur teeth.
Enon Formation (Very High Sensitivity) - formed during the breakup of Gondwana during a time of intense erosion of the rocks that constitute the Cape Fold Belt (Gresse et al. 1992).
Fossils in this formation are rare. It is unlikely but possible that this area could contain valuable fossil material.
As seen at the small quarry on site, the Enon Formation in this area is deeply weathered, this decreases the chance of finding fossil material even more.
The overall impact of the proposed development is rated as negative of low significance. The Chance Fossil Find Procedure is to be followed, in the unlikely event that fossil material is found.

Activity	**Planning for construction and operation of the proposed warehouse storage and light industrial workshops**
Layout	Proposed SDPs and bulk services (Appendix B)
Phase	**Construction and operations (as required for maintenance)**
Aspect	**Excavation activities**
Nature of Impact	**Direct – loss of historical resources**

<table>
<tr><td>Description of Impact</td><td colspan="5">Loss of paleontological &/or archaeological resources</td></tr>
<tr><td>Impact Rating</td><td colspan="5">
<table>
<tr><td>Impact Status</td><td colspan="2">Negative</td><td colspan="2">Positive</td></tr>
<tr><td></td><td colspan="2">Without mitigation</td><td colspan="2">With mitigation</td></tr>
<tr><td>Spatial</td><td>Activity - site</td><td>1</td><td>Activity - site</td><td>1</td></tr>
<tr><td>Duration</td><td>Permanent - Whether resources are destroyed / collected to take to a museum, the duration is PERMANENT.</td><td>6</td><td>Permanent - Whether resources are destroyed / collected to take to a museum, the duration is PERMANENT.</td><td>6</td></tr>
<tr><td>Frequency</td><td>Rare</td><td>1</td><td>Rare</td><td>1</td></tr>
<tr><td>Intensity</td><td>Low</td><td>1</td><td>Low</td><td>1</td></tr>
<tr><td>Severity / Degree</td><td>High</td><td>8</td><td>High</td><td>8</td></tr>
<tr><td>Consequence</td><td>Medium</td><td>9</td><td>Medium</td><td>9</td></tr>
<tr><td>Probability</td><td>Slim</td><td>1</td><td>Slim</td><td>1</td></tr>
<tr><td>Impact Significance</td><td>Low</td><td>10</td><td>Low</td><td>10</td></tr>
<tr><td>Mitigation</td><td colspan="4">Possible – chance find procedure</td></tr>
<tr><td>Confidence</td><td colspan="4">High</td></tr>
<tr><td>Reversibility</td><td colspan="4">Permanent impact (Loss / Find of any artefacts and fossils) with no chance find procedure (CF) / completely reversible with CFP</td></tr>
</table>
</td></tr>
<tr><td>Mitigation Measures</td><td colspan="5">Construction – Construction and Planning Team
Construction managers/foremen/ ESO should be informed before construction starts on the possible types of archaeological and paleontological materials they may encounter and the procedures to follow when they find sites. The paleontological assessment provides further details
ESO to supervise site clearing; If resources are unearthed during construction, the find brought to the immediate attention of the developer and all work is to be stopped immediately and reported by the ECO accompanied by photographs and coordinates. This must be sent to a specialist / WC Heritage as soon as possible to inspect the findings. Any recommendations followed from such an investigation must be carried out.
The ECO or site agent must ensure that all work ceases immediately in the vicinity of the area where the fossil or fossils have been found;
The ECO or site agent must compile a Preliminary Report and fill in the attached Fossil Discoveries: Preliminary Record Form within 24 hours without removing the fossil from its original position. The Preliminary Report records basic information about the find including: The date
A description of the discovery
A description of the fossil and its context (e.g. position and depth of find)
Where and how the find has been stored
Photographs to accompany the preliminary report (the more the better):
A scale must be used
Photos of location from several angles
Photos of vertical section should be provided
Digital images of hole showing vertical section (side);
Digital images of fossil or fossils.

Upon receipt of this Preliminary Report, SAHRA / WC Heritage will inform the ECO or site agent whether a rescue excavation or rescue collection by a palaeontologist is necessary.
Exposed finds must be stabilised where they are unstable and the site capped, e.g., with a plastic sheet or sandbags. This protection should allow for the later excavation of the finds with due scientific care and diligence. SAHRA can advise on the most appropriate method for stabilisation.

</td></tr>
</table>

	○ If the find cannot be stabilised, the fossil may be collected with extreme care by the ECO or the site agent and put aside and protected until SAHRA advises on further action. Finds collected in this way must be safely and securely stored in tissue paper and an appropriate box. Care must be taken to remove all the fossil material, and any breakage of fossil material must be avoided at all costs.
No-go alternative	**Baseline conditions will remain the same – negligible impacts on heritage resources. With not development there will be no chance to uncover potential fossils.**

TERRESTRIAL BIODIVERSITY

In terms of the Western cape biodiversity Plan (WCBSP, 2017), Terrestrial critical biodiversity area (CBA) and Ecological support areas are mapped on the property with ESA on the eastern section and CBA in the NW corner. In term so the WC BSP, 2023 no ESA layers are mapped (CFM); however, the CBA in the NW section of the site remains. No watercourses occur on the site. The site is not situated within an aquatic CBA or ESA (WC BSP). In terms of the National Vegetation Map, 2024, Hartenbos Dune Thicket (Ecosystem Status, 2022: Endangered) is mapped on the majority of the property; Garden Route Granite Fynbos (Critically Endangered) is mapped in the north western corner of the property. The cleared area in the south east is mapped as Hartenbos Dune Thicket.

The entire project area was utilised for agriculture for at least 50 years and then left fallow since about 2014, the vegetation of the project area has been classified as 'secondary shrubland'. This vegetation type was found to be characterised by low dense (>75% cover) to open (~50-75% cover) shrubland dominated by indigenous pioneer species on the entire site. Species diversity was low and not representative of the historical natural vegetation types (i.e. Hartenbos Dune Thicket and Garden Route Granite Fynbos) but rather secondary vegetation dominated by pioneer and ruderal species. Clearing of approximately 2.5 ha vegetation commenced 2020. This activity has ceased, and natural revegetation has occurred.

Consultation of the Red List of Ecosystems (RLE): Remnants Spatial Dataset (SANBI, 2021), which maps the current remaining extent of terrestrial ecosystems in South Africa based on historical aerial imagery and the South African National Land Cover (SA NLC) Map (2020), suggests that only a portion of these vegetation types remain in the northwestern and southwestern corners of the project area.

The northern western section of the site has been avoided in the alternative SDP (included in the engineering bulk services report) due to steep terrains. This SDP is preferred over the initial SDP; however, the development is recommended to be shifted out of the 2023 mapped CBA in the NW, which will require a slight reduction in the hard development footprint (2500m2) in this area. The smaller CBA on the NNW section is also avoided in the alternative SDP due to steep terrain and no changes are recommended.

The CBA identified in the SW section is fragmented and adjacent to existing WWTW. It is recommended that all workshops be planned in this SW portion, with the NW portion being a mix of storage and workshops with the storage located closest to the CBA. This will act as a buffer between ongoing human activities and the CBA and artificial wetland areas.

Impacts associated with the Terrestrial Biodiversity Theme are considered to be low to negligible in the specialist report; the underlying drivers of the CBA and 2017 ESA status of a portion of the project area, are not present, and therefore development within this area will not impact these features.

Note: This ponds and steep terrain areas are recommended as a no-go area

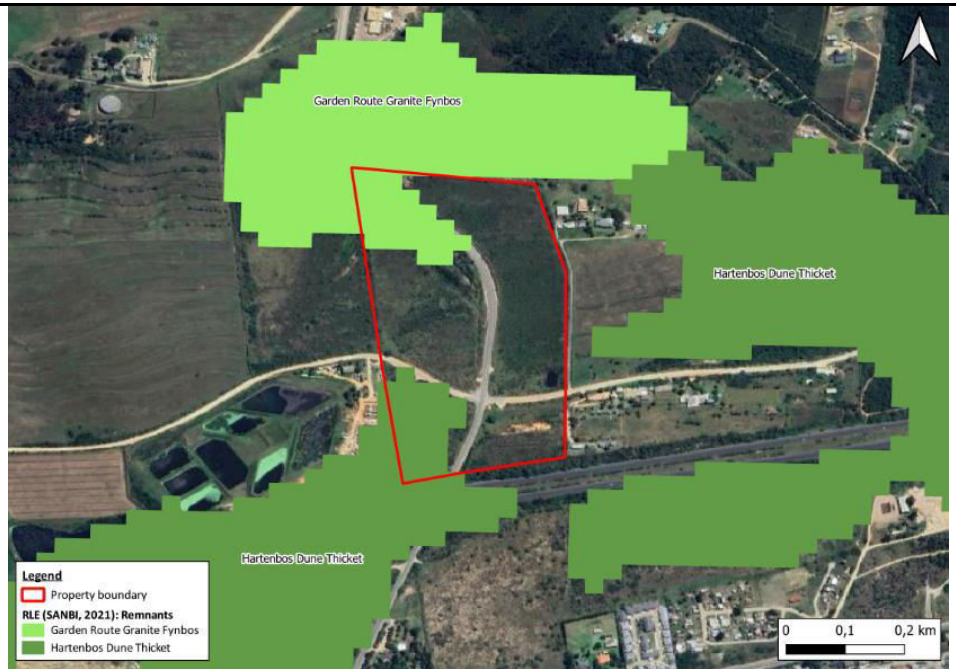

Figure 8: Map of the remaining extent of threatened ecosystems within the project area as per the RLE: Remnants (SANBI, 2021) Spatial Dataset (adapted from Biodiversity Arica, 2024) ;

Figure 9: CBA (green); degraded CBA (yellow); mapped on site in terms of WC BSP, 2023; light brown is mapped agricultural area; blue line indicates direction of surface water flows in SW direction emanating from road and steep mapped CBA (CFM)

Activity	**Planning for construction and operation of the proposed warehouse storage and light industrial workshops**
Layout	Proposed SDPs and bulk services (Appendix B)
Phase	**Construction and operations (as required for maintenance)**
Aspect	**Construction activities – site clearing, earthworks, excavations, lay down areas**
Nature of impact	**Direct - Disturbance of terrestrial biodiversity and ecological processes on the site**
Description of Impact	**Construction activities can result in disturbances outside the development footprint and impacts on ecological processes and terrestrial biodiversity**

Impact Rating

Impact Status	**Negative**		**Negative**	
	Without mitigation		With mitigation	
Spatial	Site	2	Activity	1
Duration	Short to Medium	3	Short	1
Frequency	Regular	4	Rarely	1
Intensity	Low	1	Low	1
Severity	Medium	8	Negligible	3
Consequence	Medium	10	Negligible	4
Probability	Probable	4	Plausible	3

	Impact Significance	**Medium**	**14**	**Low**	**7**
	Mitigation	Possible – impacts can be minimised .			
	Confidence	High			
	Reversibility	Possible			

Mitigation Measures

Construction – Planning and final SDP

- The proposed northern western section of the site has been avoided in the proposed SDP included in the engineering bulk services report due to steep terrains. This SDP is preferred over the initial SDP, however the mapped CBA in terms of the WC BCP is recommended to be completely avoided to completely avoid disturbance to artificial wetland in this area; this will require a slight reduction in the hard development footprint in this area as per SDP 3 in Appendix D4 (environmentally preferred)
- The smaller CBA on the NNW section is also avoided in the alternative SDP due to steep terrain. This must be designated as a no-go area.
- The CBA identified in the SW section is fragmented and adjacent to existing WWTW. It is recommended that all workshops be planned in this SW portion, with the NW portion being a mix of storage and workshops with the storage located closest to the CBA. This will act as a buffer between ongoing human activities and the CBA and wetland areas.

Construction – Project and Construction Team

- Blanket clearing of vegetation must be limited to the development footprint, and the area to be cleared must be demarcated before any clearing commences.
- No clearing outside of footprint to take place.
- Method statements for construction must be compiled by the construction team and approved by the ECO prior to construction.
- All construction activities must remain with development footprint.
- Movement of workers must be limited to areas under construction.
- All staff must be briefed about the layout of the construction site and must be made aware of the no-go areas as the surrounding environment is sensitive and must not be disturbed.

Phase	**Operational**
Aspect	**Operational activities –maintenance**
Nature of Impact	**Disturbance to terrestrial biodiversity and ecological processes**
Description of Impact	**Poor management practices can result in impacts or threats to conservation targets and/or ecological processes.**

Impact Rating

Impact Status	**Negative**		**Negative**	
	Without mitigation		With mitigation	
Spatial	Site	2	Activity	1
Duration	Short to Medium	3	Very Short	1
Frequency	Regular	4	Rarely	1
Intensity	Low	1	Low	1
Severity	Medium	8	Negligible	3
Consequence	Medium	10	Negligible	4
Probability	Probable	4	Plausible	3
Impact Significance	**Moderate**	**14**	**Low**	**7**
Mitigation	Possible - Impact can be minimised and managed with mitigation.			
Confidence	High			
Reversibility	Difficult			

Mitigation Measures	**Operations – Planning and Operational Team** • Maintenance activities to stay within demarcated activity and demarcate and remain within footprint. As per construction mitigations.
No go alternative	**Baseline conditions will remain the same** The site is no longer representative of historical vegetation on the property, and drivers on the site are considered to be absent. Note: The 1.5 ha NW CBA section has not historically been disturbed due to steep terrain; although the wetland is artificial, it has been in place for many years and provides an important stormwater service for the site in terms of managing the runoff from the hard road surface and it likely provides habitat and foraging for fauna species. It is recommended that the development moves completely out of the mapped CBA (estimated 2500m2) will require a slight shift in the SDP. The only activity that should be permitted here is alien invasive vegetation removal, using hand tool removal as first option (pull out small emerging plants as soon as detected) or using hand held tools. No heavy machinery is to be permitted in this northern area.

INDIGENOUS VEGETATION AND SPECIES OF CONSERVATIONAL CONCERN

In terms of the National Vegetation Map, 2019, Hartenbos Dune Thicket (Ecosystem Status, 2022: Endangered) is mapped on the majority of the property; Garden Route Granite Fynbos (Critically Endangered) is mapped in the north western corner of the property. The cleared area in the south east is mapped as Hartenbos Dune Thicket (NatVeg Map, 2019).

Consultation of the Red List of Ecosystems (RLE): Remnants Spatial Dataset (SANBI, 2021), which maps the current remaining extent of terrestrial ecosystems in South Africa based on historical aerial imagery and the South African National Land Cover (SA NLC) Map (2020), suggests that only a portion of these vegetation types remain in the northwestern and southwestern corners of the project area.

The entire project area was utilised for agriculture for at least 50 years and then left fallow since about 2014. Due to the historical clearance of vegetation over a prolonged period, and the disturbance of the soil and seedbank, these areas are unlikely to have a species composition representative of the original habitat (SANBI, 2020). The vegetation of the project area has been classified as 'secondary shrubland'. This vegetation type was found to be characterised by low dense (>75% cover) to open (~50-75% cover) shrubland dominated by indigenous pioneer species on the entire site. Species diversity was low and not representative of the historical natural vegetation types (i.e. Hartenbos Dune Thicket and Garden Route Granite Fynbos) but rather secondary vegetation dominated by pioneer and ruderal species. Clearing of approximately 2.5 ha vegetation commenced 2020. This activity has ceased, and natural revegetation has occurred.

The plant species diversity of the project area was relatively low, and the vegetation cover was largely dominated by a few pioneer shrub species (namely *Osteospermum moniliferum*, *Helichrysum cymosum, Passerina corymbosa*, *Dicerothamnus rhinocerotis, Searsia pallens*) interspersed with herbs and other shrubs with a lower percentage cover.

Seventy-three (73) plant species were recorded during the field survey, of which sixty (60) are indigenous and twelve (12) are exotic.

Only one (1) plant SCC was recorded during the field survey, namely *Hermannia lavandulifolia* classified as VU under category A2c. This species was present in low densities and its distribution was restricted to the southwestern corner of the project area (near Sandhoogte Road). *H. lavandulifolia is a widespread and common species, with an extent of occurrence (EOO) of 12 018 km². Its habitat typically includes clay slopes in renosterveld and valley thicket. It is declining due to significant, ongoing habitat loss and degradation. Based on the observed rate of habitat loss, a population reduction of 31% over three generations is inferred. It is therefore listed as Vulnerable under criterion A (von Staden, 2018). No other SCC were recorded during the field survey. Although species such as Euchaetis albertiniana and Agathosma macrocarpa have been recorded in remnant patches of natural vegetation nearby, considering the transformed nature of the project area, the botanist is of the opinion that the likelihood of occurrence of these and any additional SCC is moderate to low.*

Activity	Past agricultural activities (estimated 1963 until 2014)
Layout	**NA**
Phase	**Operations**
Aspect	**Crops**
Nature of impact	**Direct / cumulative - Loss of indigenous vegetation and disruption to associated fauna, habitats and forage areas**

<table>
<tr><td>Description of Impact</td><td colspan="5">Past agricultural activities (estimated 1963 until 2014) resulted in loss of indigenous vegetation and SCC - The loss of the entire project area (18.5 ha) would constitute a habitat loss of 0.002% for identified plant SCC.</td></tr>
<tr><td>Impact Rating</td><td colspan="5">
<table>
<tr><td>Impact Status</td><td colspan="2">Negative</td><td colspan="2">Negative</td></tr>
<tr><td></td><td colspan="2">Without mitigation</td><td colspan="2">With mitigation – not applicable</td></tr>
<tr><td>Spatial</td><td>Site</td><td>2</td><td></td><td></td></tr>
<tr><td>Duration</td><td>Medium to long</td><td>5</td><td></td><td></td></tr>
<tr><td>Frequency</td><td>Rare</td><td>1</td><td></td><td></td></tr>
<tr><td>Intensity</td><td>Medium high</td><td>4</td><td></td><td></td></tr>
<tr><td>Severity</td><td>Medium high</td><td>10</td><td></td><td></td></tr>
<tr><td>Consequence</td><td>Medium</td><td>12</td><td></td><td></td></tr>
<tr><td>Probability</td><td>Expected</td><td>5</td><td></td><td></td></tr>
<tr><td>Impact Significance</td><td>Medium high</td><td>17</td><td></td><td></td></tr>
<tr><td>Mitigation</td><td colspan="4">NA – past use activity</td></tr>
<tr><td>Confidence</td><td colspan="4">High</td></tr>
<tr><td>Reversibility</td><td colspan="4">Note reversible</td></tr>
</table>
</td></tr>
<tr><td>Activity</td><td colspan="5">Clearing activities by Idel training in 2020 on SW portion</td></tr>
<tr><td>Layout</td><td colspan="5">SW portion (2.5 ha)</td></tr>
<tr><td>Phase</td><td colspan="5">Construction</td></tr>
<tr><td>Aspect</td><td colspan="5">excavation</td></tr>
<tr><td>Nature of impact</td><td colspan="5">Direct - Loss of indigenous vegetation and disruption to associated fauna, habitats and forage areas</td></tr>
<tr><td>Description of Impact</td><td colspan="5">Loss of secondary shrubland and indigenous pioneer species
The loss of the disturbed area (2.5 ha) would constitute a habitat loss of 0.0002% for identified plant SCC.</td></tr>
<tr><td>Impact Rating</td><td colspan="5">
<table>
<tr><td>Impact Status</td><td colspan="2">Negative</td><td colspan="2">Negative</td></tr>
<tr><td></td><td colspan="2">Without mitigation</td><td colspan="2">With mitigation – not applicable</td></tr>
<tr><td>Spatial</td><td>Activity</td><td>1</td><td></td><td></td></tr>
<tr><td>Duration</td><td>Medium</td><td>3</td><td></td><td></td></tr>
<tr><td>Frequency</td><td>Rare</td><td>1</td><td></td><td></td></tr>
<tr><td>Intensity</td><td>Medium low</td><td>2</td><td></td><td></td></tr>
<tr><td>Severity</td><td>low</td><td>6</td><td></td><td></td></tr>
<tr><td>Consequence</td><td>low</td><td>7</td><td></td><td></td></tr>
<tr><td>Probability</td><td>Expected</td><td>5</td><td></td><td></td></tr>
<tr><td>Impact Significance</td><td>Medium</td><td>12</td><td></td><td></td></tr>
<tr><td>Mitigation</td><td colspan="4">NA – past use activity</td></tr>
<tr><td>Confidence</td><td colspan="4">High</td></tr>
<tr><td>Reversibility</td><td colspan="4">Site regenerated back to secondary vegetation</td></tr>
</table>
</td></tr>
<tr><td>Activity</td><td colspan="5">Planning for construction and operation of the proposed warehouse storage and light industrial workshops</td></tr>
<tr><td>Layout</td><td colspan="5">Proposed SDPs and bulk services (Appendix B)</td></tr>
<tr><td>Phase</td><td colspan="5">Construction</td></tr>
<tr><td>Aspect</td><td colspan="5">Site clearing and construction activities on 18 ha</td></tr>
</table>

<table>
<tr><td>Nature of Impact</td><td>Direct – Loss of indigenous vegetation on 18 ha and potential loss of SCC</td></tr>
<tr><td>Description of Impact</td><td>Site clearing will result in loss of indigenous vegetation and could result in loss of SCC. Loss of vegetation is a permanent impact. The baseline vegetation is noted to be in an already transformed state and not representative of intact historical vegetation. The site will be completely transformed to a light industrial / storage warehouse area.</td></tr>
<tr><td>Impact Rating</td><td>
<table>
<tr><td>Impact Status</td><td colspan="2">Negative</td><td colspan="2">Negative</td></tr>
<tr><td></td><td colspan="2">Without mitigation</td><td colspan="2">With mitigation (including recommendations for layout 3)</td></tr>
<tr><td>Spatial</td><td>Site</td><td>2</td><td>Site</td><td>2</td></tr>
<tr><td>Duration</td><td>Long term</td><td>5</td><td>Long term</td><td>5</td></tr>
<tr><td>Frequency</td><td>Rarely</td><td>1</td><td>Rarely</td><td>1</td></tr>
<tr><td>Intensity</td><td>Low to medium</td><td>2</td><td>Low</td><td>1</td></tr>
<tr><td>Severity</td><td>Medium</td><td>8</td><td>Low</td><td>7</td></tr>
<tr><td>Consequence</td><td>Medium</td><td>10</td><td>Low</td><td>9</td></tr>
<tr><td>Probability</td><td>Plausible</td><td>3</td><td>Slim</td><td>1</td></tr>
<tr><td>Impact Significance</td><td>Medium</td><td>13</td><td>Low</td><td>10</td></tr>
<tr><td>Mitigation</td><td colspan="4">Possible – impacts can be managed with mitigation (collection of plants / animals etc) during construction phase.</td></tr>
<tr><td>Confidence</td><td colspan="4">High</td></tr>
<tr><td>Reversibility</td><td colspan="4">Difficult - permanent impact</td></tr>
</table>
</td></tr>
<tr><td>Mitigation Measures</td><td>

A pre-commencement flora search and rescue procedure is to be carried out prior to start of site clearing.
Permits for the removal and/or translocation of protected species must be obtained prior to the clearance of vegetation. These species can be used for rehabilitation/landscaping of disturbed areas that do not form part of the development footprint. The following species are protected in terms of Schedule 4 of the WC Nature Conservation Law Amendment Act, 2000 and therefore require permits for removal and/or translocation:

Carpobrotus deliciosus (LC)
Ruschia sp. –
Aloe maculata (LC)
Bobartia robusta (LC)
Strelitzia nicolai (LC)

If permits are required:

Notify local harvesters of plants that need to be rescued via the ward councillor to determine whether the plants would be required by local traditional healers (traditional healers prefer to collect from the wild and not after the plant has been collected and stored in a nursery)
Allow 3 months for permit application process
Keep permits on record
Relocate to suitable area of similar vegetation, outside construction disturbance area; keep for rehabilitation / traditional healer permitted to use plant

Stripped vegetation and topsoil should be temporarily stored in designated area (compost area) during construction phase and to be used later to rehabilitate disturbed areas and stabilize slopes. This excludes alien invasive species.
Workers are NOT allowed to disturb any flora species outside of development footprint with exception of AIS. Spot checks of pockets and bags recommended to be done on a regular basis
No vegetation may be used as firewood. -No open fires permitted on site.
The closure of the site will involve removal of all debris and rehabilitation of areas disturbed during the construction phase of the project. This will comprise the scarification of compacted areas, reshaping of areas, topsoiling and rehabilitating all prepared surfaces.
Only indigenous species must be used for rehabilitation outside of the development footprint.
All impacted areas that do not form part of the development must be rehabilitated using indigenous vegetation.
The surface of the processing areas especially if compacted due to hauling and dumping operations shall be scarified to a depth of at least 200 mm and graded to an even surface condition and the previously stored topsoil will be returned to its original depth over the area.
Mulch and topsoil shall be placed on disturbed area and planted / seeded with indigenous grasses and plants

</td></tr>
</table>

<table>
<tr><td></td><td>• Adequate management, maintenance and monitoring will be carried out three month post closure to ensure successful rehabilitation of the property until a closure certificate is obtained.</td></tr>
<tr><td>Phase</td><td>Planning for construction and operation of the proposed warehouse storage and light industrial workshops</td></tr>
<tr><td>Aspect</td><td>Proposed SDPs and bulk services (Appendix B)</td></tr>
<tr><td>Nature of Impact</td><td>Operations (as required for maintenance)</td></tr>
<tr><td>Description of Impact</td><td>Poor maintenance activities during operational phase can result in the permanent or temporary loss of indigenous vegetation, and SCC species.</td></tr>
<tr><td>Impact Rating</td><td>
<table>
<tr><td>Impact Status</td><td colspan="2">Negative</td><td colspan="2">Negative</td></tr>
<tr><td></td><td colspan="2">Without mitigation</td><td colspan="2">With mitigation (including recommendations for layout 3)</td></tr>
<tr><td>Spatial</td><td>Activity</td><td>1</td><td>Activity</td><td>1</td></tr>
<tr><td>Duration</td><td>Very Short</td><td>1</td><td>Very Short</td><td>1</td></tr>
<tr><td>Frequency</td><td>Infrequent</td><td>2</td><td>Rarely</td><td>1</td></tr>
<tr><td>Intensity</td><td>Low</td><td>1</td><td>Low</td><td>1</td></tr>
<tr><td>Severity</td><td>Low</td><td>4</td><td>Negligible</td><td>3</td></tr>
<tr><td>Consequence</td><td>Low</td><td>5</td><td>Negligible</td><td>4</td></tr>
<tr><td>Probability</td><td>Probable</td><td>4</td><td>Plausible</td><td>3</td></tr>
<tr><td>Impact Significance</td><td>Low</td><td>9</td><td>Low</td><td>7</td></tr>
<tr><td>Mitigation</td><td colspan="4">Possible – impacts can be managed</td></tr>
<tr><td>Confidence</td><td colspan="4">High</td></tr>
<tr><td>Reversibility</td><td colspan="4">Difficult</td></tr>
</table>
</td></tr>
<tr><td>Mitigation Measures</td><td>Planning and operational
• Put in place construction phase mitigations as required</td></tr>
<tr><td>No go alternative</td><td>Baseline conditions will remain the same – negligible impacts on flora due to no clearing and current status quo (secondary vegetation) will remain with potential impacts of AIS growth, cattle grazing and illegal dumping on the site</td></tr>
</table>

FAUNA HABITATS AND FAUNA SPECIES

The project area occurs within, or partly within, the distribution range of 20 amphibian species, 70 reptile species, 114 mammal species, and 458 bird species (IUCN, 2022). Of these species, 17 mammal species and 19 bird species are listed as threatened (CR, EN and VU) or near threatened (NT) species which are collectively referred to as SCC. No reptile or amphibian SCC have a distribution range that includes the project area.

The project area is fenced and fragmented by two main roads, creating barriers for larger animals. The vegetation of the project area is fairly uniform; likely due to previous farming activities, with limited diversity of faunal habitats. The following habitat types were identified within the project area:

Open to dense shrubland with grassy ground cover and scattered alien trees

Artificial wetlands/dams which are largely devoid of riparian vegetation except for a few sedges.

No amphibian or reptile SCC were identified for the project area. All amphibian and reptile species with a distribution that coincides with the project area are classified as Least Concern (LC).

The project area intersects with the distribution range of seventeen (17) mammal SCC, two (2) of which have a high likelihood of occurrence within the project area:

- African striped weasel (*Poecilogale albinucha*)
- Fynbos golden mole (*Amblysomus corriae*)

The project area intersects with the distribution range of nineteen (19) bird SCC, one (1) of which has a high likelihood of occurrence (Denham's Bustard (*Neotis denhami*) , two (2) of which have a moderate likelihood of occurrence (Martial Eagle (*Polemaetus bellicosus*); African Marsh Harrier (*Circus ranivorus*)), and sixteen (16) of which have a low likelihood of occurrence due

to the lack of suitable habitat

The specialist assessment states that impacts are expected to be low to negligible when assessed within context of the degraded, fragmented habitat. And further states that the impacts on SCC and other fauna is expected to be low as they are expected to move away when disturbances start. The loss of habitat for the Fynbos Golden Mole is estimated to be approximately 0.07% and not expected to threaten the threat status of this animals.

The Site ecological importance of the habitat for the near threatened African striped weasel and Fynbos golden mole is rated as medium.

Although SCC occurrence of the site is reported to be low in number with an overall low biodiversity the degraded site still offers some forage and habitat, and care must be taken to prevent harm to fauna. The loss of the vegetation (even though secondary) will still be a permanent loss and change to mixed / light industrial use. The overall indirect / cumulative impact is therefore assessed as medium and search and rescue of fauna that may be inhabiting the site is important to be carried out prior to site clearing and mitigation measures are recommended to prevent unnecessary disturbance to fauna. It is important to note that both SCC mammals are nocturnal, and the mole lives underground to a depth of up to 1 meter and the weasel commonly makes use of other habitats (e.g. Logs or termite mounds); the Denham's bustard nests on the ground and is diurnal. This must be taken into account during search and rescue.

The northern CBA mapped in terms of the WC BSP, 2023 has not been as impacted on as the rest of the site due to steep terrain; the majority of this area has been excluded by the most recent SDP however, it is recommended that the SDP be shifted slightly to be completely out of this mapped area and to place storage containers at the base of this CBA rather that workshops to serve as a buffer between the degraded CBA and the rest of the site (as per SDP 3 – Appendix 4 – environmentally preferred). Larger CBA mapped within the area is located only 900 m NW of the site and only fragment by two small farms roads, so it could offer some ecological value to the fauna of the area.

Activity	Mixed / light industrial
Layout	Proposed SDPs and bulk services (Appendix B)
Phase	Construction
Aspect	Site layout, site clearing, construction activities -loss of habitat and forage area will be permanent
Nature of Impact	Direct / indirect / cumulative- Loss of faunal habitats, processes, and SSC
Description of Impact	Construction activity may result in the loss of habitat for faunal species, which could result in disturbance and displacement of faunal species, impact on faunal processes, loss of faunal SSC

Impact Rating

Impact Status	**Negative**		**Negative**	
	Without mitigation		With mitigation	
Spatial	Site	2	Site	2
Duration	Very short	1	Very short 1	1
Frequency	Rarely	1	Rarely	1
Intensity	Low to medium	2	Low	1
Severity	Medium	4	Negligible	3
Consequence	Medium	6	Negligible	5
Probability	Probable	4	Slight	2
Impact Significance	Low	10	Low to negligible	7
Mitigation	Possible – impacts can be minimised with mitigation during construction phase.			
Confidence	High			
Reversibility	Permanent impact (Loss of SCC, habitat)			

Mitigation Measures

Planning and design

Fences / walls

- Permeable internal and external fences/walls to allow for the movement of fauna through the development. These must have ground level gaps of 10cm x 10cm at 10m intervals. These gaps must be kept free of obstructions, including plant growth and debris.

Stormwater / drainage / erosion control structures

- All guttering and kerbstones must be sloped i.e. 450deg or less on either side / kerbstone slanted or lowered to allow for easy passage of small fauna
- Steep sided drains, gutters, canals and open pits/trenches to be covered with mesh (5mm x 5mm) to prevent fauna falling in and getting stuck. No unnecessary structures that would act as pitfall traps for animals must be constructed
- If there are retaining walls, steps should be formed to allow for small fauna (e.g toads) to move over them; these are to be vegetated.

Lighting

- No construction night lighting must be allowed. If required, minimise lighting in open space areas within development and any external lights must be down lights placed as low as possible and installation of low UV emitting lights, such as most LEDs.
- Any external lights required during the operational phase must be down lights, with low UV emittance. Lights should not be pointed outward or towards the sky

Pre-construction

Search and rescue

- Fauna search and rescue to be carried out prior to commencement; specialist is to take note of expected fauna identified in assessment and searches in early evening are recommended due to the nocturnal nature of the mammals on site.
- Any permits for sensitive fauna species of conservational concern to be in place prior to construction. Note that species listed in terms of the WC Nature Conservation Law Amendment Act, 2000, including most birds, all tortoises, frogs, toads and lizards are also protected and also require permits. Sites with eggs or chicks are protected sites. Fast moving animals will naturally move away however care must be taken with the slow-moving animals . immobile animal (e.g nesting birds, tortoises) found prior to start of construction must be relocated with required permits issued by Cape Nature and relocated as required. The contractor is to allow 3 months for a search and rescue permit process.

Staff awareness

- Staff must be made aware what all SCC looks like and to report all fauna occurring on site to the SEO who will report to external ECO.
- Weekly toolbox talks should be held, during which the ECO should remind all staff of construction phase mitigation measures
- A clause must be included in contracts for ALL construction personnel (i.e. including contractors) working on site stating that: “no wild animals will be hunted, killed, poisoned, or captured. No wild animals will be imported into, exported from or transported in or through the province. No wild animals will be sold, bought, donated and no person associated with the development will be in possession of any live wild animal, carcass or anything manufactured from the carcass.” A clause relating to fines, possible dismissal and legal prosecution must be included should any of the above transgressions occur, especially for SCC.
- Contractual fines to be imposed on any employee who is found attempting to harm fauna in surrounding areas.

Site clearing

Microhabitats (e.g. rock stacks and logs) in the clearing footprint must be relocated to the same habitat immediately adjacent to the removal site. E.g. Rock stacks should be restacked. Rehabilitation efforts outside of the development (eg in 5 meters between boundary and development / SWM pond areas) must provide habitat for faunal species by placing logs and rocks at strategic sites to provide shelter for small mammals and reptiles.

General during construction

- All construction and construction related activities (including parking of vehicles and machinery) must remain within the approved development footprint. No construction and construction related activities are permitted to encroach on neighbouring properties. A fine system must be put in place for transgressions by the

	developer and included in contractual agreements with all staff and contractors • The ESO should walk ahead of construction machinery directly prior to vegetation clearance. Should any faunal species be identified during the walk through, these should be allowed to move out of harm's way prior to vegetation clearance • No animals are to be harmed or killed during construction activities. • All open excavations must be securely fenced or barricaded. Excavations must be checked daily for trapped fauna. Trapped animals are to be rescued and released. • Establish strict speeding regulations during construction phase. All personnel and visitors to abide to speeding regulations. The recommended speed is 20 km/hour on sites of this kind. Signs should be put up along the roads to remind people of speed limits, as well as warnings to look out for small animals on the roads. Response to fauna on site • If any animals are seen on site, a photo or a video should be taken if possible (to assists in identification) and all fauna encountered on site should be reported to the ECO immediately. This is particularly important when: o An animal is harmed or compromised in any way during construction. o Ground-dwelling animals their nests or eggs are unearthed during earthworks (e.g. moles, o tortoise eggs, terrapins/frogs estivating). o Any animal with limited mobility is found on site (e.g. tortoises, moles, chameleons). o Any potentially dangerous animal is encountered. This includes any potentially venomous animal (e.g. snakes, scorpions) or any medium-large animal that has become cornered in an enclosed area such that it cannot escape (e.g. porcupines, monkeys, baboons, antelope). It is critical in the case of snakes/ scorpions o get pictures/videos to aid in identification and appropriate treatment of anyone needing medical assistance. o Any animal that shows a reluctance to escape or move away from the construction site thereby increasing its exposure to harm or increasing the risk of injuring people on site. o For any injured animals or animals to be removed from site (domestic or wild): • The ESO and ECO should provide guidance or assistance to get all animals to safety, treating any injured animals, and issuing instructions on when to continue with construction (once they are satisfied that all animals have been removed from site) or put additional mitigation measures in place to protect animals on the site from harm. • A local SPCA or animal welfare society can collect and treat most animals and should be the first point of call for assistance. If they cannot directly assist, they will revert and notify the relevant authorities/vets. • For any assistance with snake removals/relocations, identifications, or bite treatment contact the African Snakebite Institute / keep contact details of a trained snake handler within the site office Operation – Planning and Operational Team • Ongoing maintenance is likely to be required in the long-term, which could include maintenance/replacement of defective or broken infrastructure components within the site where applicable.
No go alternative	**Baseline conditions will remain the same – no disturbance to faunal habitats / foraging areas and fauna on site**

ALIEN INVASIVE SPECIES

Alien Invasive Species (AIS) refer to those plants occurring in areas where they are not naturally found, and which have the potential to spread into and invade the landscape at the expense of indigenous vegetation causing environmental, economic and social harm; these plants can reproduce and spread without the direct assistance of people and the more aggressive invaders

can occupy large areas (SANBI, 2021). Landowners are under legal obligation to control alien plants occurring on their properties. Alien Invasive Plants require removal in terms of the Conservation of Agricultural Resources Act 43 of 1983 (CARA) and the National Environmental Management: Biodiversity Act (10 of 2004; NEMBA): Alien and Invasive Species Lists (GN R598 and GN R599 of 2014).

Twelve (12) AIS were recorded within the project area, five (5) of which are categorised in terms of the National Environmental Management: Biodiversity Act (NEM:BA) (Act No. 10 0f 2004) and/or the Conservation of Agricultural Resources Act (CARA) (Act No. 43 of 1983). For the purposes of this development, all Category 1b and 2 species listed under NEM:BA and all Category 1 and 2 species listed under CARA need to be removed, and ongoing follow up measures implemented to ensure that AIS do not return. List of potential AIS identified in terrestrial biodiversity report (Appendix H1)

SCIENTIFIC NAME	COMMON NAME	FAMILY	NEMBA	CARA
Acacia mearnsii	Black wattle	Fabaceae	2	2
Acacia cyclops	Green wattle	Fabaceae		
Lantana camara	Lantana	Verbenaceae	1b	1
Atriplex semibaccata	Pine	Amaranthaceae		
Persicaria lapathifolia	smartweed	Polygonaceae		
Agave americana	Agave	Asparagaceae	3	
Schkuhria pinnata	dwarf Mexican marigold	Asteraceae		
Tagetes minuta	Khakibos	Asteraceae		
Ficus elastica	Rubber vine	Moraceae		
Arundo donax	giant reed	Poaceae		1
Cortaderia selloana	pampas grass	Poaceae	1b	1
Paspalum dilatatum	Dallas grass	Poaceae		

Activity	**Mixed / light industrial**
Layout	Proposed SDPs and bulk services (Appendix B)
Phase	**Construction / operations**
Aspect	**Alien invasive plant species**
Nature of Impact	**Direct / indirect and cumulative – Increase in alien invasive vegetation**
Description of Impact	Construction sites often lead to seeding of AIS common to the area because the soils are bare and disturbed and therefore easy for seeds to be lodged. Ongoing AIS is recommended throughout construction and operational phase. Ongoing removal of AIS as soon as detected and keeping open space areas free of AIS can be a positive impact. Ongoing clearing will be particularly important in all the stormwater pond and open space areas; AIS establish and grow quickly in drainage areas.

Impact Rating

Impact Status	**Negative**		**Negative / Positive**	
	Without mitigation		With mitigation	
Spatial	Site	2	Activity	1
Duration	Short to Medium	3	Short	2
Frequency	Seldom	3	Infrequent	2
Intensity	Low to medium	2	Low	1
Severity	Medium	8	Low	5
Consequence	Medium	10	Negligible	6
Probability	Probable	4	Slight	2
Impact Significance	Medium	14	Low	8

	Mitigation	Possible – impacts can be managed with mitigation; impacts of medium high significance requires strict environmental management
	Confidence	High
	Reversibility	Difficult and expensive if not kept under control
Mitigation Measures	**Construction** • Construction sites to be kept free from AIS as per CARA/NEMBA requirements. • An Alien Invasive Management Method Statement for the site must be compiled and implemented during construction and include the following: • ESO, contractor and staff to familiarise themselves with common AIS in the area • AIS must be cleared by hand (i.e. when young and first detected) before the use of mechanical or chemical or biological treatment as recommended per AIS. No heavy machinery is permitted in the no-go areas and SWMP areas for AIS clearing. This must be done using hand tool only and subsequent chemical treatment (kaput) / ring barking as required. Contact agricultural research council / working for water for recommended AIS clearing option and accompanying product. • Removal of AIS to be done according to the Working for Water Guidelines. • The Contractor is responsible for the removal of AIS within all areas disturbed during construction activities. Disturbed areas include (but are not limited to) access roads, construction camps, site areas and temporary storage / laydown areas. • AIS plant material (including brushwood and seeds) should be removed from site and disposed of at a registered waste disposal site. Should brushwood be utilised for soil stabilization or mulching, it must be seed free. • After clearing is completed, mulch the area and see / plant indigenous plants, should natural re-vegetation not take place in a timely manner (within 2 weeks) • A three month follow up (post construction) is required to determine AIS removal and revegation of disturbed areas. **Operational** • An AIS management levy is recommended to be charged to all workshops as part of levy / rent agreement • The entire site particularly the SWM ponds and no-go areas to be kept free of alien tree growth / regrowth throughout operational phase as per CARA/NEMBA requirements. • Put in place AIS management programme for operational phase. • AIS must be cleared by hand (i.e. when young and first detected) before the use of mechanical or chemical treatment. No heavy machinery is permitted in the no-go areas and SWMP areas for AIS clearing. This must be done using hand tool only and subsequent chemical treatment (kaput) / ring barking as required. • Removal of AIS to be done according to the Working for Water Guidelines. • AIS is recommended to be audited annually as part of the recommended annual environmental compliance audit	
No go alternative	**Baseline conditions will remain the same –secondary vegetation and AIS**	

FIRE RISK

Vegetation on site is representative of degraded Garden Route Granite Fynbos (north section) and Hartenbos Dune Thicket. The site and surrounding areas appear to be degraded landscapes due to agricultural activities. Fynbos is a fire driven ecosystem where thicket vegetation is less prone to fire than fynbos because it is more succulent. The majority of the vegetation on site will be cleared, with remaining open space / vegetated areas including the stormwater management pond areas, the steep area which coincides with the WC BSP CBA in the northern sections and the 5 meters between the erf boundary and the development. The National Veld and Forest Fire Act (Act 101 of 1998) specifies the need for landowners to manage fires with suitable fire breaks and clearing of AIS. Negligence with regards to fire management has legal implications. Any person that owns and/manages property where fire is a risk must develop a fire management plan, with assistance from a suitable specialist (SANBI, 2021).

Activity	**Mixed / light industrial**
Layout	Proposed SDPs and bulk services (Appendix B)
Phase	**Construction / operations**
Aspect	**Fire risks**

<table>
<tr><td>Nature of Impact</td><td>Direct</td></tr>
<tr><td>Description of Impact</td><td>Without interventions to prevent / control potential fire outbreaks, damage to surrounding biodiversity and infrastructure could occur</td></tr>
<tr><td>Impact Rating</td><td>
<table>
<tr><td>Impact Status</td><td colspan="2">Negative</td><td colspan="2">Negative</td></tr>
<tr><td></td><td colspan="2">Without mitigation</td><td colspan="2">With mitigation</td></tr>
<tr><td>Spatial</td><td>Local</td><td>3</td><td>Site</td><td>2</td></tr>
<tr><td>Duration</td><td>Very short</td><td>1</td><td>Very Short</td><td>1</td></tr>
<tr><td>Frequency</td><td>Rarely</td><td>1</td><td>Rarely</td><td>1</td></tr>
<tr><td>Intensity</td><td>High</td><td>5</td><td>Medium</td><td>3</td></tr>
<tr><td>Severity</td><td>Medium</td><td>7</td><td>Medium</td><td>5</td></tr>
<tr><td>Consequence</td><td>Medium</td><td>10</td><td>Medium</td><td>7</td></tr>
<tr><td>Probability</td><td>Probable</td><td>4</td><td>Plausible</td><td>3</td></tr>
<tr><td>Impact Significance</td><td>Medium</td><td>14</td><td>Low</td><td>10</td></tr>
<tr><td>Mitigation</td><td colspan="4">Possible</td></tr>
<tr><td>Confidence</td><td colspan="4">High</td></tr>
<tr><td>Reversibility</td><td colspan="4">Possible / difficult (costly)</td></tr>
</table>
</td></tr>
<tr><td>Mitigation Measures</td><td>
Planning, construction, operations

No cigarette butts or burning substances are permitted to be released into the environment.
All cigarette butts to be extinguished first and then disposed of in a waste receptacle (sand buckets) provided.
Ensure all emergency numbers are in place and visible
Emergency preparedness plan to be put in place to fight accidental fires on site / adjacent to site, should they occur. The adjacent landowners/users/managers should also be informed or otherwise involved as required.
No open fires permitted on site; if such an area is required, an enclosed fire -safe area should be provided equipped with all relevant safety measures and equipment. The area must be away from flammable stores. “Low smoke” fuels must be used (e.g., charcoal) and relevant regulations abided to.
Fire-fighting equipment must be in place on site, including fire extinguishers and emergency fire water.
Fires and “hot work” must be restricted to demarcated areas.
Precautions when working with welding or grinding equipment near potential sources of combustion. Such precautions include having a suitable, tested and approved fire extinguisher immediately at hand and the use of welding curtains (refer to HSA and OSHA)

Fire preparedness and response

Job specific training to be provided to individuals responsible for dealing with fire management.
If a fire is detected it must be attended to immediately;
Adequate fire-fighting measures must be available and readily accessible on site.
Fire-proof hedges (Esler et al., 2014) can be made with indigenous thicket species to reduce fire risk around the built environment. This could be around building and in the 5 meter buffer around perimeter of development with exception of steep northern CBA where fynbos will remain.
AIS management must be put in place
Ensure all emergency numbers are always in place and visible.

Fire Management plan recommendations:

Mechanical clearing
Selectively thin areas where the veld is old, or where invasive species are becoming more dominant.
The thinning and cutting of vegetation will mimic an aspect of the effect of fire.
Utilization of biomass cleared (excluding that of cleared invasive or alien plants):

</td></tr>
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	• Distribute chipped material evenly and thinly to avoid fire hazards. • Become member of South Cape Fire prevention association
No go alternative	**Baseline conditions will remain the same – presence of AIS and high fire risk.**

SOIL

The area is underlain by the Kirkwood formation; the lithology is described as Variegated (reddish-brown and greenish) silty mudstone and sandstone, subordinate grey shale and sandstone.

The broad soils classification (ENPAT) of the southern portion:
Land Type: Dc28
Soil Type: Grey regic sands and other soils
Geology: Mainly fixed dunes, dune rock and aeolian sand
Soil erodibility: High

The broad soils classification (ENPAT) of the northern portion:
Land type: Hb62
Soil Type: Prismacutanic and/or pedocutanic diagnostic horizons dominant. In addition, one or more of: vertic, melanic, red structured diagnostic horizons
Geology: Mainly conglomerate, sandstone, siltstone and mudstone of the Enon Formation, Uitenhage Group.
Soil erodibility: Moderate

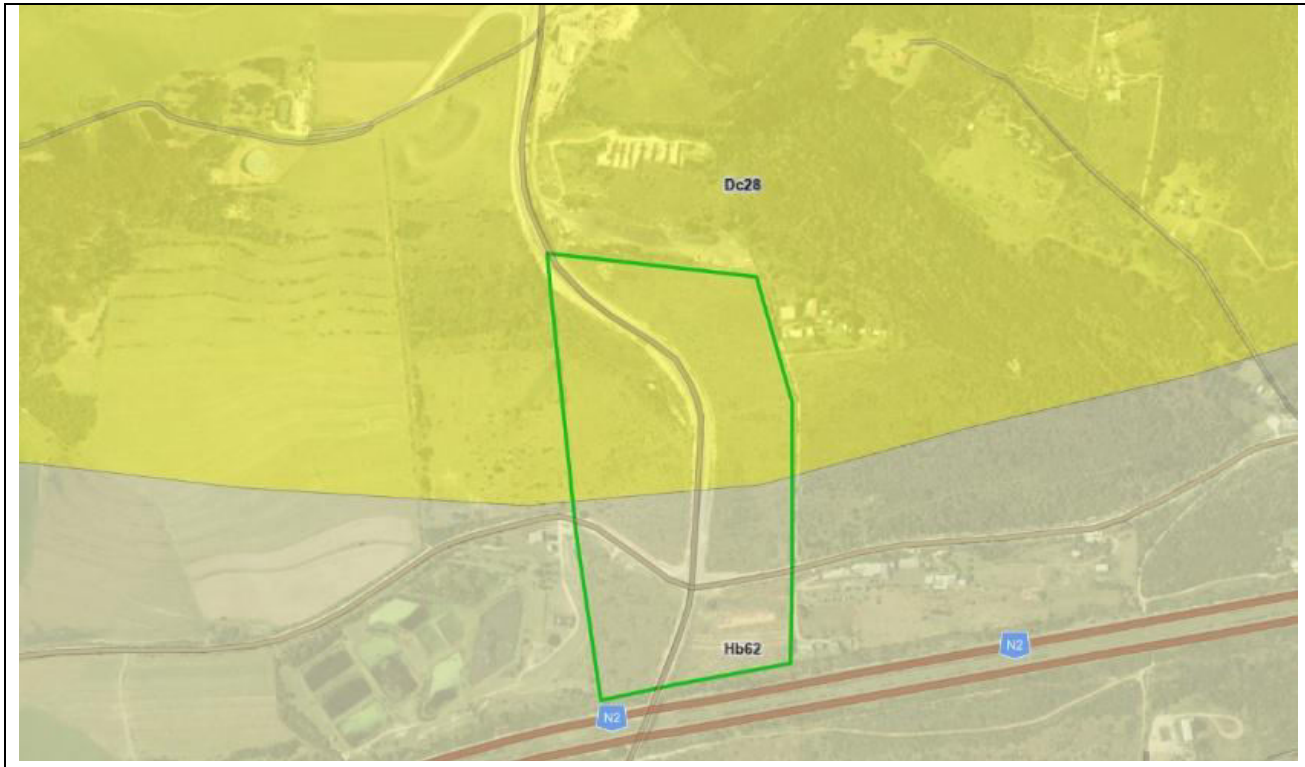

Figure 10: Land types and soil classifications with dune (aeolian) sands in the southern section

The site is underlain by sandy, highly permeable soils typical of the coastal foreland zone, which allow for rapid infiltration of rainfall. As a result, there is minimal surface water retention. The local topography further limits surface water concentration and there are no defined drainage lines, only subtle depressions and slight dips that do not effectively channel or retain runoff. The combination of geology, soil characteristics, and topography significantly reduces the potential for wetland or river system development in the area.

Blanket clearing must be avoided to prevent excessive dust and wind and water erosion. Subsoil stockpiles are recommended to be appropriately stored on level areas and covered and backfilled first if used for backfilling and levelling. Topsoil is to be stockpiled separately in a suitable area and covered with mulch / removed indigenous vegetation and used for landscaping and rehabilitation requirements and placed after backfilled subsoils. Where large areas are exposed, the site will need to be watered during windy condition to prevent loss of soil and dust generation. Storage workshop are planned on the central eastern section of the site to allow the required sewage reticulation of the site to be a gravitational system and therefor require less energy for pumping. Strict measures will be required to contain hazardous materials throughout construction and operational phase as the soil is highly permeable. It is recommended that soft footprint workshop activities be placed in the aeolian sands section. This can be finalised during planning and when proposed workshop activities and relevant details are provided. It is recommended that the section of development planned within the mapped CBA be removed and this area not disturbed by and construction or operational activities with exception of controlled alien invasive removal. The pond will assist with runoff management from the road, and all steep areas (1:4, however 1:5 is preferred) avoided. SUDS (eg rainwater tanks, permeable pavers) is recommended to be incorporated into the water / stormwater management plan.

Activity	**Mixed / light industrial**
Layout	**Alternative SDP in bulk services report (Appendix B2)**
Phase	**Construction, Operational Phase**

<table>
<tr><td>Aspect</td><td>Site clearing, general construction activities, bare soil, stockpiling, general maintenance activities</td></tr>
<tr><td>Nature of Impact</td><td>Direct - Loss of soil; damage to soil structure, erosion, dust generation</td></tr>
<tr><td>Description of Impact</td><td>Loss of soil can be caused due to poor management (stockpiling, excavations, vehicle entrainment) resulting in erosion and dust generation.</td></tr>
<tr><td>Impact Rating</td><td>
<table>
<tr><td>Impact Status</td><td>Negative</td><td></td><td>Negative</td><td></td></tr>
<tr><td></td><td>Without mitigation</td><td></td><td>With mitigation</td><td></td></tr>
<tr><td>Spatial</td><td>Site</td><td>2</td><td>Activity</td><td>1</td></tr>
<tr><td>Duration</td><td>Short to Medium</td><td>3</td><td>Very Short</td><td>1</td></tr>
<tr><td>Frequency</td><td>Seldom</td><td>3</td><td>Rarely</td><td>1</td></tr>
<tr><td>Intensity</td><td>Low</td><td>1</td><td>Low</td><td>1</td></tr>
<tr><td>Severity</td><td>Medium</td><td>7</td><td>Negligible</td><td>3</td></tr>
<tr><td>Consequence</td><td>Medium</td><td>9</td><td>Negligible</td><td>4</td></tr>
<tr><td>Probability</td><td>Probable</td><td>4</td><td>Plausible</td><td>3</td></tr>
<tr><td>Impact Significance</td><td>Medium</td><td>13</td><td>Low</td><td>7</td></tr>
<tr><td>Mitigation</td><td colspan="4">Possible – impacts can be managed during construction phase.</td></tr>
<tr><td>Confidence</td><td colspan="4">High</td></tr>
<tr><td>Reversibility</td><td colspan="4">Possible / Difficult - damage to soil structure difficult to reverse / possible to manage erosion and stockpiles</td></tr>
</table>
</td></tr>
<tr><td>Mitigation Measures</td><td>
Planning – Planning team
• It is recommended that both artificial dams on the site be retained as part of SW management (SDP 3 – Appendix D4)
• Soft landscaping and rainwater tanks are recommended to be incorporated into the water / stormwater management
• Design the proposed development site to follow natural contour lines as far as possible.
• Ensure the site is appropriately levelled to fit in with current topography levels of adjacent areas
• Suitable measures must be implemented in areas susceptible to erosion.

Construction and Operations where applicable to maintenance activities
• Prepare method statement to indicate how soil will be managed during site clearing and must include these mitigation measure:
• Site clearing to be done in phased manner. No blanket clearing of vegetation is permitted to avoid large areas of unconsolidated soils;
• Excavated material and stockpiles must be placed outside of the pond areas and sediment must be prevented from being washed downslope.

Topsoil and vegetation management:
• Topsoil should be cleared in a phased manner and placed on designated level areas; Designated area/s for storage of topsoil to be selected in conjunction with ESO and ECO; area/s selected should be an area which will not be disturbed from construction activities for duration of construction period. The topsoil will be invaluable during rehabilitation otherwise the project will need to buy in topsoil / mulch / plants for landscaping.
• Topsoil includes 150 to 250 mm of soil and needs to be stripped separately. Topsoil and vegetation on the site in new excavation areas must be stripped to a maximum depth of 30cm / 300 mm
• Topsoil and vegetation is to be kept in designated piles of maximum 1 m in height in a designated topsoil /compost area, to prevent anaerobic conditions from smothering seeds and rendering them inviable and must be suitably covered with shade cloth (or another breathable material with a fine mesh) to prevent any additional invasive species seeds from falling in and establishing in the soil.
• Topsoil shall be kept separate from sub soils and shall not be used for building or maintenance of roads.

Subsoil management
• Excavated material (subsoil and rocks) generated on site to be used as fill material for site levelling.
• Designated areas for storage of topsoil and subsoil to be on level areas - This must be done to avoid double handling soils. Stockpile subsoils separately in designated and demarcated area; use as fill material for levelling. Wet / cover / stabilise with vegetation to prevent loss and dust generation.
</td></tr>
</table>

	• This is to be stockpiles separately to topsoil / vegetation. • Cover subsoils with shade cloth to prevent dust /loss of material General • Do not create multiple tracks • Do not drive over stockpiles and compact soil • All materials, stockpiles and ablutions to be placed outside identified drainage zones on the site • As necessary, dampen exposed soil areas on very windy days (>45 km/hr wind speeds) to prevent soil erosion by wind / dust generation. A water cart or sufficient watering equipment should be available to wet soils during windy days if wind-blown sand and dust becomes a problem. During strong wind conditions it may be necessary to halt operations until conditions improve. • Rehabilitate open areas with stockpiled topsoil and indigenous seeds on completion of construction area as per landscaping requirements and stormwater pond areas.
No go alternative	**Baseline conditions will remain the same – no damage or loss of soil due to no construction disturbances.**

AQUATIC SYSTEMS

The project area falls within the Breede-Gouritz Water management Area, within Primary Catchment K (Kromme) area and in quaternary catchment K10F. The site is therefore managed by the Breed-Gouritz Water catchment management agency (BOCMA). The main river in this catchment is the Klein Brak River, however, the site is not connected to this drainage network. The Groot Brak river is east of the site. The site does not fall within a sub-quaternary catchment (SQC) that has been categorised as a Freshwater Ecosystem Priority Area (FEPA) or a Strategic Water Source Area (SWSA). According to the National Wetland Map 5 (Van Deventer et al. 2018), there are no wetlands within a 500m radius of the site. There are no sensitive aquatic features mapped on the site. The NFEPA does indicate the presence of artificial wetlands, confirmed to be farmers dams; although artificial, the ponds have been in place for many years and provides an important stormwater service for the site in terms of managing the runoff from the hard road surface. The only activity that should be permitted in the pond areas is alien invasive vegetation removal, using hand tool removal as first option (pull out small emerging plants as soon as detected) or using hand held tools. Natural wetland mapped in terms of the NFEPA occur within 500 meters of the site to the north and east of the site. The wetland to the north will not be impacted on by the development.

Runoff direction from the site is to the central western and eastern sections of the site from the north and south areas (Refer to Figure 13). The existing farmers dam in the SE is proposed to be retained as a stormwater management pond (as per SDP 3 – Appendix B4). A stormwater pond is proposed to be put in place in the SW section of the site which continues to flow towards the adjacent artificial ponds which make up the adjacent WWTW. It is noted that the SWMP includes a Minor system designed for 2-year return period and the Major system designed for 50-year return period. This is expected to be sufficient to manage runoff and mitigate impacts on the eastern wetland. Due to the low risk nature, a general authorisation will be required for NWA Section 21 c and I water uses to authorise development within 500 meters of artificial and natural wetlands.

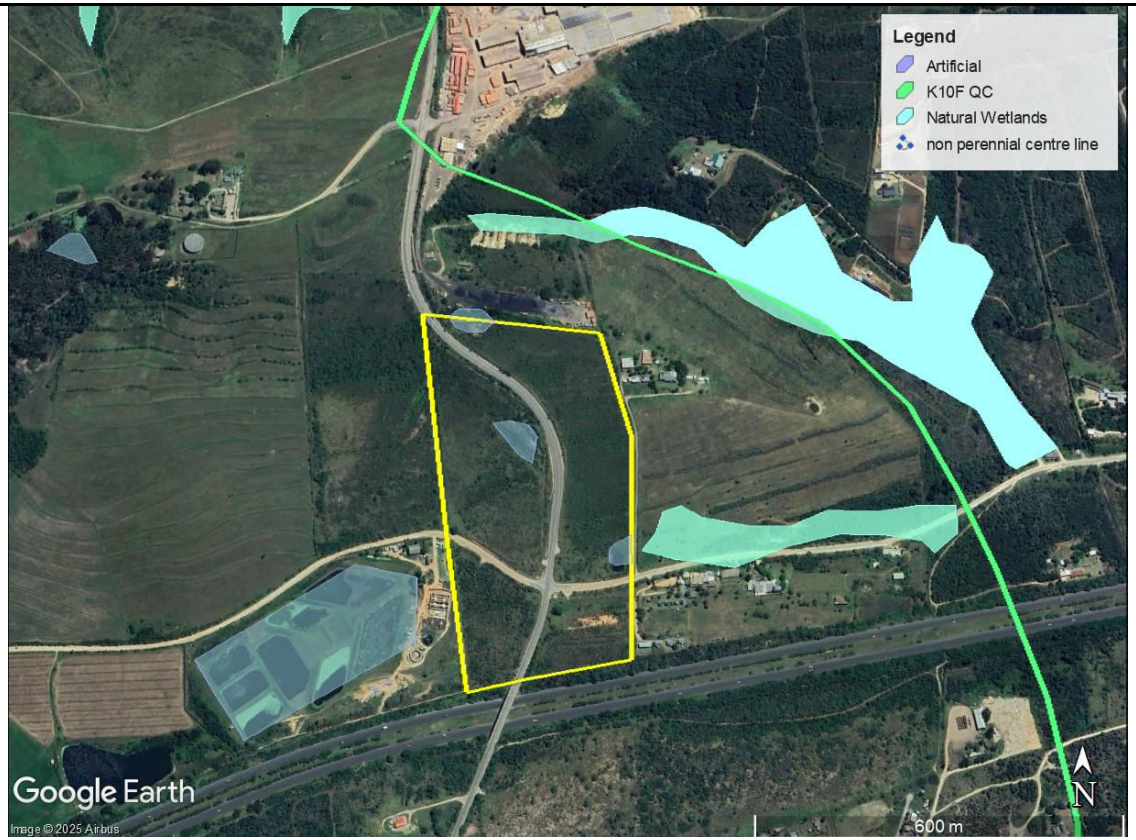

Figure 11: Artificial and natural wetlands occurring within 500 meters of site (NFEPA)

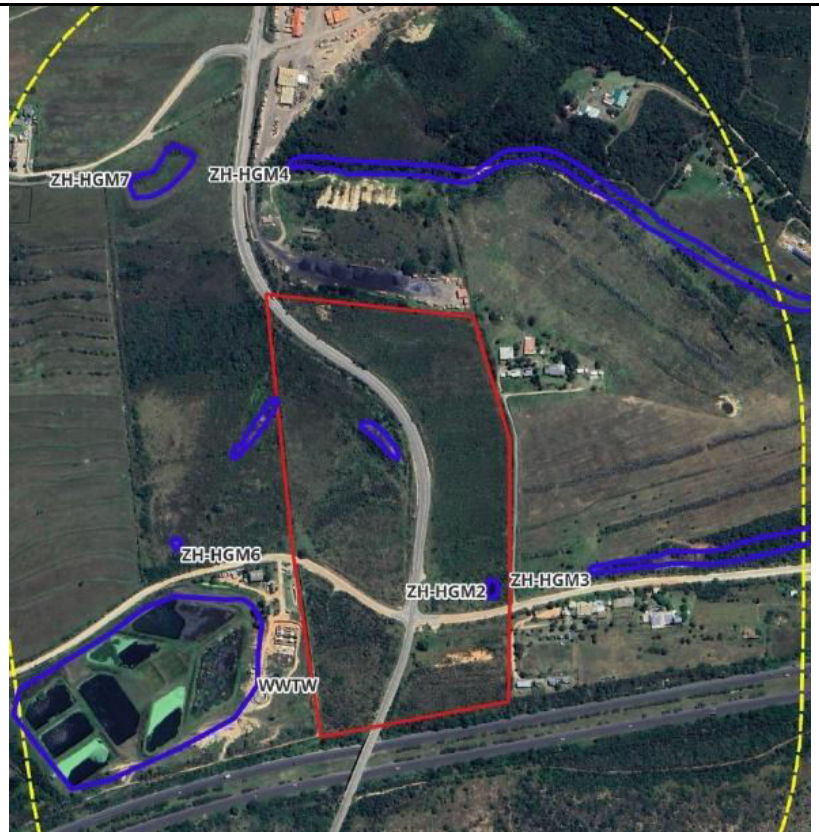

Figure 12: Artificial and natural wetlands occurring within 500 meters of site (verification, Upstream Consulting, 2025)

Figure 13: SWMP overlaid showing direction of runoff and indication of proposed SWM ponds (east and western); one artificial wetland will be retained as a SWMP; the artificial wetland in the north central section falling within mapped CBA is recommended to be retained and development not take place within this mapped CBA.

Activity	**Planning for construction and operation of the proposed warehouse storage and light industrial workshops**
Layout	Proposed SDPs and bulk services (Appendix B)
Phase	**Construction and Operational Phase**
Aspect	**Construction activities, operational and maintenance activities**
Nature of Impact	**Direct – Disturbance / Loss of aquatic habitat and species**
Description of Impact	No natural wetlands are mapped on the site, and the site is not expected to impact on natural wetlands occurring to the east of the site with mitigation in place. Both artificial wetlands / dams should be kept as part of SW management for the site. The NW pond currently provides a SW service to the site and likely offers some habitat / foraging for flora and fauna; this NW area is recommended to not be disturbed during construction or operations. An additional pond will be added on the western section.

Impact Rating

Impact Status	**Negative**		**Negative**	
	Without mitigation		With mitigation	
Spatial	Activity	1	Activity	1
Duration	Very short	1	Very short	1
Frequency	Seldom	3	Rare	1
Intensity	Low	1	negligible	1
Severity	Low	5	negligible	3
Consequence	Low	6	negligible	4
Probability	Probable	4	Plausible	3
Impact Significance	Low	10	Low	7
Mitigation	Possible			
Confidence	High			
Reversibility	Low			

Layout	Alternative SDP and stormwater management plan in bulk services report (Appendix B)
Phase	Construction and Operational Phase
Aspect	Construction activities, operational and maintenance activities
Nature of Impact	Direct - Increase in runoff
Description of Impact	The moderate gradient and creation of hard surfaces will increase the amount of runoff generated on the site which could result in trasnporation of sediment / pollutants if runoff is not adequately managed throughout construction and operations.

Impact Rating

Impact Status	**Negative**		**Negative**	
	Without mitigation		With mitigation	
Spatial	Site	2	Activity	1
Duration	Medium	3	Short	2
Frequency	Seldom	3	Seldom	2
Intensity	Medium	3	Low	1
Severity	Medium to High	9	Low	6
Consequence	Medium High	11	Low	7
Probability	Expected	5	Probable	4
Impact Significance	**Medium**	**16**	**Low**	**10**
Mitigation	Possible			
Confidence	High			
Reversibility	Low			

Mitigation Measures

Planning – Planning Team

- Remove development from mapped CBA in northern western portion and retain this area with artificial wetland (as per revised SDP, Appendix D4)
- During construction, the edge of the development footprint relative to the ponds should be clearly marked and considered as a No-Go Area. Excavated material and stockpiles must be placed outside of these areas and sediment must be prevented from being washed downslope.
- Put SWM ponds in place as a first step in the sequence of events to cater for Stormwater management during construction phase;
- Stormwater management should focus on introducing runoff responsibly into the receiving environment and implement the SUDs design proposed in the engineering report. E.g. Incorporate catchment of runoff from roofs using rainwater tanks and allowing this water to be suitably filtered and used on the site for all water use requirements. There

	is minimal landscaping so irrigating with this water is not an option. Incorporate permeable pavers as sandy nature of soil will allow for rapid infiltration reduction stormwater overflow form hard surfaces. • Make use of permeable pavers and incorporate soft landscaping where possible • Ensure the western access road is equipped with suitable measures to allow drainage to the SW pond adjacent to the access road (e.g, small culvert or similar) • Development should follow the natural topography of the site wherever feasible, minimizing cut-and-fill and maintaining gentle, stable slopes for operational areas **Construction and Operations** • Prevent pollution of freshwater ecosystems by the proper disposal of construction waste, sewage, and hazardous materials. No contaminated surface runoff or wastewater/ wash water must be allowed to enter the stormwater system or surrounding environment, particularly any chemicals from industrial workshop activities. • Implement stormwater, erosion control and waste management measures. • Limit any spills from plant, machines or camps during the construction phase. • No discharge of dirty water permitted into watercourses / surrounding environment • Any use of chemical, cement or paint must be carefully monitored. • Ensure required spill kits are in place. • Provide suitable solid / liquid waste management that is serviced regularly. • Temporary drainage works may be required to prevent stormwater to prevent silt laden surface water from draining into watercourses. • Stormwater must be prevented from entering or running off site. • During construction, temporary slopes may be profiled up to a maximum of 1:3 (V:H), provided appropriate erosion and sediment control measures are implemented. Diversion channels should be constructed ahead of the open cuts, and above stockpiles to intercept clean runoff and divert it around disturbed areas into the natural drainage system downstream of the site. • Rehabilitation is necessary to control erosion and sedimentation of all eroded areas (where works will take place). • Existing vegetation must be retained as far as possible to minimise erosion problems. All open ground areas must be mulched and vegetated with suitable groundcover and indigenous vegetation to manage erosion and stormwater absorption. Make use of vegetation instead of concrete wherever possible. Areas where construction is completed should be rehabilitated immediately. • Visual inspections will be done on a regular basis regarding the stability of water control structure, erosion and siltation. • The development must be inspected regularly for any sewage leaks, waste/ wastewater spills, and for any discharging of 'dirty' / contaminated water from the facility. This must be enforced, and any owners, tenants and workers must be aware of these restrictions. • The stormwater infrastructure should be checked annually and following every high rainfall event to ensure it is working effectively.
No-go Alternative	**Baseline conditions remain – no impact on aquatic resources**

VISUAL IMPACTS

Mismanaged construction sites can result in windblown litter, spillages and overflowing waste, all which have a negative visual impact on receptors.

Light pollution is of global concern given that our night skies are getting lighter due to urban development and that many animals are specifically adapted to dark night skies for navigation, foraging and behavioural aspects (i.e. sleep, hunting). Many insects are attracted to or disorientated by artificial lights, leading to aggregations at such point sources. This interferes with their

natural behaviour (i.e. feeding), associated ecosystem services they provide (e.g. pollination) and often has fatal consequences for individuals unable to escape the 'light trap'. There is also the cumulative impact of attracting predators to light sources (e.g. birds, frogs, small mammals) and exposing them to risks in these areas as well.

Activity	**Planning for construction and operation of the proposed warehouse storage and light industrial workshops**
Layout	Proposed SDPs and bulk services (Appendix B)
Phase	**Construction and Operational Phase**
Aspect	**Lighting / Construction activities**
Nature of Impact	**Direct – construction activities**
Description of Impact	**Mismanaged construction sites can result in negative visual impact on receptors**

Impact Rating

Impact Status	**Negative**		**Negative**	
	Without mitigation		With mitigation	
Spatial	Site	2	Site	1
Duration	Medium to long	4	Short to medium	3
Frequency	Regular	4	Seldom	3
Intensity	Low	1	Low	1
Severity	Medium	9	Low	7
Consequence	Medium	11	Low	8
Probability	Plausible	3	Slight	2
Impact Significance	Medium	14	Low	10
Mitigation	Possible			
Confidence	High			
Reversibility	Possible			

Activity	**Planning for construction and operation of the proposed warehouse storage and light industrial workshops**
Layout	**Alternative SDP in bulk services report (Appendix B)**
Phase	**Operations**
Aspect	**Lighting**
Nature of Impact	**Direct / Cumulative – light pollution on biodiversity and residents**
Description of Impact	**Light pollution can lead to disruption of natural and social behaviour.**

Impact Rating

Impact Status	**Negative**		**Negative**	
	Without mitigation		With mitigation	
Spatial	Site	2	Site	1
Duration	Medium to long	4	Short to medium	3
Frequency	Regular	4	Seldom	3
Intensity	Low	1	Low	1
Severity	Medium	9	Low	7
Consequence	Medium	11	Low	8
Probability	Plausible	3	Slight	2
Impact Significance	Medium	14	Low	10
Mitigation	Possible			
Confidence	High			

	Reversibility	Possible
Mitigation Measures	Planning and design • Select yellow / dim lights which are less attractive to insects than bright white or blue lights • Design elements to include lights facing toward ground rather than facing up towards the sky Construction • Construction to take place during daylight hours - the site can be adequately monitored for fauna during work hours, and the use of artificial lighting at night will be prevented. • Ensure good housekeeping measures on site; put in place all construction mitigation measures to reduce visual impacts • A complaints register should be kept to document complaints and the corrective action taken. • Light pollution must be reduced and avoided wherever possible Operations • Good housekeeping measures required for storage areas and for each workshop • Maintain lighting as required	
No go alternative	**Baseline conditions will remain the same – no visual impacts as a result of construction activities**	

NOISE IMPACTS

Noise pollution can disturb wildlife (disrupt mating calls and reduce production rates) and alter behaviour (abandon territories). Noise can be an interference to daily life of local residences. The site is located adjacent to the WWTW in the west, a pub and grill in the east and is traversed by two main roads. Industrial activities north of the site and an open area to the northeast. Noise levels must be kept to a minimum to prevent unnecessary disruptions. No blasting is expected to be required for the site.

Activity	**Planning for construction and operation of the proposed warehouse storage and light industrial workshops**
Layout	Proposed SDPs and bulk services (Appendix B)
Phase	**Construction**
Aspect	**Noise generated from construction activities**
Nature of Impact	**Direct – Noise impacts**
Description of Impact	**Construction noise can be an interference to daily life of local people in the project area**

Impact Rating

Impact Status	**Negative**		**Negative**	
	Without mitigation		With mitigation	
Spatial	Site	2	Activity	1
Duration	Very Short	1	Very Short	1
Frequency	Often	5	Regular	4
Intensity	Medium	3	Low	1
Severity	Medium	9	Medium	6

Consequence	Medium	11	Low	7
Probability	Probable	4	Plausible	3
Impact Significance	Medium	15	Low	10
Mitigation	Possible			
Confidence	High			
Reversibility	Possible			

Mitigation Measures	**Planning and Construction, Operations** • Provide 2 weeks' notice to surrounding landowners of start of proposed development; communicate via local radio stations and ward councillors. • No loud music to be allowed on site. • All vehicles and machinery must be kept in good working condition. • Working hours and deliveries / collections to be restricted to day time hours (i.e. 8 am to 5pm) • No machinery permitted on Saturdays; no construction work to take place on Sundays / public holidays • Ensure details of contractor, engineer, site control officer and ECO are displayed to the public to allow for communication between project members and community members • Ensure complaints register and community liaison officer is in place to record complaints and respond to complaints • Ensure all activities comply to the Mossel Bay Municipality: Zoning Scheme By-law, 2021 as applicable to mixed / light industrial land use • (iii) No activities shall be carried out which constitute or are likely to constitute a source of nuisance, including the use of equipment that generates excessive noise, or any activity which results in the generation of dust, fumes, smoke, or waste material which could be detrimental to health, or which requires special waste removal processes;
No go alternative	**Baseline conditions will remain the same – no noise impacts**

GENERAL WASTE AND HAZARDOUS MATERIALS

General waste expected to be generated includes excavated material that will not be reused for level / fill material (construction phase), building rubble (construction phase), alien invasive material containing seed that cannot be used for mulch and general waste items such as metals, plastics, paper, tins (both phases). Waste streams for construction and operational phase need to be estimated and correctly managed on site (storage), in transit and offsite (licensed waste sites / recycling operations).
Hazardous waste expected to be generated includes sewage (portable ablution facilities as required)(construction phase only), any fuel / oil / chemical spillages.
Hazardous materials used during construction and operational phase need to be correctly managed.
Care must be taken to ensure hazardous materials are always contained to prevent pollution to the underlying soil and in the stormwater runoff.

In the bulk services reports prepared by it is stated that, for operational phase, refuse removal shall be performed by the Municipality in accordance with a signed services agreement. Access for municipal refuse removal vehicles shall be incorporated into the access gate arrangements. The provision of a solid waste collection area shall be incorporated into the access gate arrangements, or in close vicinity to the access gate, in a manner so as not to hinder normal operations at the gate.

Investigations to reduce, reuse and recycle waste generated during the construction and operational phases are recommended.

<table>
<tr><td>Activity</td><td colspan="6">Planning for construction and operation of the proposed warehouse storage and light industrial workshops</td></tr>
<tr><td>Layout</td><td colspan="6">Proposed SDPs and bulk services (Appendix B)</td></tr>
<tr><td>Phase</td><td colspan="6">Construction Phase and Operational Phase</td></tr>
<tr><td>Aspect</td><td colspan="6">General waste</td></tr>
<tr><td>Nature of Impact</td><td colspan="6">Direct</td></tr>
<tr><td>Description of Impact</td><td colspan="6">Incorrect waste management can result in impact on natural terrestrial and aquatic systems and biodiversity</td></tr>
<tr><td>Impact Rating</td><td colspan="6">
<table>
<tr><td>Impact Status</td><td colspan="2">Negative</td><td colspan="2">Negative</td></tr>
<tr><td></td><td colspan="2">Without mitigation</td><td colspan="2">With mitigation</td></tr>
<tr><td>Spatial</td><td>Site</td><td>2</td><td>Activity</td><td>2</td></tr>
<tr><td>Duration</td><td>Short to medium</td><td>3</td><td>Very short</td><td>1</td></tr>
<tr><td>Frequency</td><td>Regular</td><td>4</td><td>Infrequent</td><td>2</td></tr>
<tr><td>Intensity</td><td>Low to medium</td><td>2</td><td>Low</td><td>1</td></tr>
<tr><td>Severity</td><td>Medium</td><td>9</td><td>Low</td><td>4</td></tr>
<tr><td>Consequence</td><td>Medium</td><td>11</td><td>Low</td><td>5</td></tr>
<tr><td>Probability</td><td>Probable</td><td>4</td><td>Probable</td><td>4</td></tr>
<tr><td>Impact Significance</td><td>Medium</td><td>15</td><td>Low</td><td>9</td></tr>
<tr><td>Mitigation</td><td colspan="4">Possible – impacts can be minimised with mitigation during construction phase.</td></tr>
<tr><td>Confidence</td><td colspan="4">High</td></tr>
<tr><td>Reversibility</td><td colspan="4">Possible</td></tr>
</table>
</td></tr>
<tr><td>Mitigation Measures</td><td colspan="6">

The waste management hierarchy – avoid, reduce, reuse, recycle, dispose is to be followed throughout construction and operational phase
Determine general waste streams and quantities to ensure provision of adequate waste management facilities on site;
Investigate disposal / reuse/ recycling services in the local area.
Include details of waste stream and preferred management option in general waste management method statement and include the following:
Receptacles (covered, labelled) to be provided for smaller general waste items generate on site. If waste will be recycled, provide separately labelled receptacle as required per waste stream. Reuse and recycling must be considered before disposal.
All waste stored on site must be designated bins equipped with lids that can be secured / stored in a secure area when construction is not taking place (evenings, weekends, holidays, etc.) to prevent interference by animals.
All waste, particularly food waste, should be regularly removed from the property and disposed of appropriately to prevent the scent of old products increasing the attractiveness to the disposal area and surrounding development for wildlife / if it is composted on site, it must be done using combination of anaerobic and aerobic process within sealed room / container.
General Waste receptacles should be emptied on a regular basis.
Excavated material from site levelling will as far as possible be used on-site as fill material. Excess excavated material that cannot be used in this way will be exported from the site and reused as fill at other construction activities elsewhere in MBM or disposed of at an appropriately licensed waste disposal facility. Construction waste (e.g. packaging material, unused concrete) not reused / recycled must be disposed of at an appropriately licensed waste disposal facility.
Alien invasive material to be placed in bags (if kept on site for any period of time) / removed offsite immediately for disposal at registered waste site.
No burning of waste.
No dumping or burial of waste
No littering, waste dumping or burning is allowed on the site or in the surrounding environment.
Designated waste management areas – spoil stockpiles, AIS seed material, paper / plastic / tins, food waste
Proof recycling / reuse / legal disposal must be kept on record by ESO for audit purposes.
A waste management plan for operational phase should be prepared by each workshop detailing types and volumes generated and proposed recycling / reuse / disposal methods

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<tr><td>Phase</td><td colspan="6">Planning and Construction and operational Phase</td></tr>
</table>

<table>
<tr><td>Aspect</td><td colspan="5">Hazardous materials</td></tr>
<tr><td>Nature of Impact</td><td colspan="5">Direct</td></tr>
<tr><td>Description of Impact</td><td colspan="5">Incorrect waste management can result in pollution of soil; runoff, aquatic systems, fauna and flora</td></tr>
<tr><td>Impact Rating</td><td colspan="5">
<table>
<tr><td>Impact Status</td><td colspan="2">Negative</td><td colspan="2">Negative</td></tr>
<tr><td></td><td colspan="2">Without mitigation</td><td colspan="2">With mitigation</td></tr>
<tr><td>Spatial</td><td>Activity</td><td>1</td><td>Activity</td><td>1</td></tr>
<tr><td>Duration</td><td>Medium</td><td>3</td><td>Very short</td><td>1</td></tr>
<tr><td>Frequency</td><td>Seldom</td><td>3</td><td>Infrequent</td><td>2</td></tr>
<tr><td>Intensity</td><td>Medium</td><td>3</td><td>Low</td><td>1</td></tr>
<tr><td>Severity</td><td>Medium</td><td>9</td><td>Low</td><td>4</td></tr>
<tr><td>Consequence</td><td>Medium</td><td>10</td><td>Low</td><td>6</td></tr>
<tr><td>Probability</td><td>Probable</td><td>4</td><td>Probable</td><td>4</td></tr>
<tr><td>Impact Significance</td><td>Medium</td><td>14</td><td>Low</td><td>10</td></tr>
<tr><td>Mitigation</td><td colspan="4">Possible.</td></tr>
<tr><td>Confidence</td><td colspan="4">High</td></tr>
<tr><td>Reversibility</td><td colspan="4">Possible</td></tr>
</table>
</td></tr>
<tr><td>Mitigation Measures</td><td colspan="5">Planning, Construction, Operations
• Identify hazardous materials required
• Prepare method statement indicating what hazardous substance (fuel, oil, sewage etc.) will be on site will be generated and how they will be managed.
• Any fuel and other hazardous substances to be stored on site in bunded area equipped with roof under lock and key with appropriate signage. Fuels and hazardous liquids must be stored in an impervious, bunded and covered area with a capacity of 110% of the largest single storage tank.
• If generators are refuelled on site, they must be placed on trays, which rest on clean sand and once construction is complete this must be removed from the site and disposed of at an appropriately registered waste disposal facility.
• Drip trays are required to be placed under all equipment using fuels /oils.
• Complete spill kits with accompanying storage container required to be on site equipped with hazardous bin for placement of spills cleaned up using absorbents
• Hazardous bins required for storage of any hazardous waste materials.
• Wash station to be provided for cleaning of hazardous paint / building materials. Wash water may not be disposed to watercourses or the natural environment. This must be disposed at a facility that can accept hazardous waste water and details of service provider and proof must be kept on record.
• Do not leave machinery / vehicles running unnecessarily. Service machines and vehicles regularly to prevent unnecessary fumes and leaks.
• Construction machinery must be stored in an appropriately sealed area. Vehicles and construction equipment should not be serviced at the site to prevent pollution of the soils by hydrocarbons or oil.
• Leaking or empty drums must be removed from the site immediately and disposed of via a registered waste disposal contractor or at a registered waste disposal site.
• If repairs of vehicles must take place on site, an appropriate drip tray must be used to contain any fuel or oils.
• The risk of spilling fuel is at its greatest during refuelling of vehicles and plants. Refuel in designated area, on an impermeable surface well away from any drainage lines or watercourses.

Concrete, cement, plastering, and painting:
• Mixing areas be clearly defined on the site and must be surrounded by an impermeable material (i.e. create a temporary coffer dam with sandbags and thick plastic sheeting) to prevent any runoff and absorption into the surrounding soils.
• The designated mixing areas should be limited to areas that will become future hard surfaces on the site. No concrete and cement mixing are allowed in areas outside of the proposed hardened surfaces of the camping block.
• No concrete and cement mixing are allowed in areas outside the site development area</td></tr>
</table>

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Cleaning of cement, plastering & paint equipment must be done into a designated, bunded, & lined slurry sump or container to avoid contaminating the environment.

General

No placement of waste storage / hazardous material storage areas within no go areas (ponds and 5 meter buffer of ponds)
Any contaminated/polluted soil removed from the site must be disposed of at a licensed hazardous waste disposal facility.
An incident/complaints register must be established and maintained on-site. Corrective action must be undertaken immediately if a complaint is received, or potential/actual leak or spill of polluting substance identified. This includes stopping the contaminant from further escaping, cleaning up the affected environment as much as practically possible and implementing preventive measures.
Should a polluting incident occur, the Resident Engineer or his representative shall immediately contact the regional office of the Department of Water and Sanitation (as required by the National Water Act). Clean-up shall take place in consultation with the Department of Water and Sanitation.
The Resident Engineer or his representative shall ensure that all precautions are taken to ensure that no surface or ground water becomes polluted. Any deliberate or unplanned pollution of water is an offence in terms of the National Water Act (Act 36 of 1998) and is punishable with a fine not exceeding R50 000-00 and / or two years imprisonment.
Upon the completion of construction, the area will be cleared of potentially polluting materials.
Records of any hazardous waste disposal to be kept
Spill response training to be provided for sewage spills, leaks, contaminated water
Hazardous substance management and hazardous waste management plan should be put in place by each workshop detailing control, storage and disposal of any hazardous materials.

</td></tr>
<tr><td>Phase</td><td>Planning, construction, and Operational Phase</td></tr>
<tr><td>Aspect</td><td>Waste management</td></tr>
<tr><td>Nature of Impact</td><td>Cumulative</td></tr>
<tr><td>Description of Impact</td><td>Increasing disposal at landfill and few recycling options - increasing development in the area will place more pressure on the landfill options available.</td></tr>
<tr><td>Impact Rating</td><td>
<table>
<tr><td>Impact Status</td><td colspan="2">Negative</td><td colspan="2">Positive</td></tr>
<tr><td></td><td colspan="2">Without mitigation</td><td colspan="2">With mitigation (recycling / reuse options)</td></tr>
<tr><td>Spatial</td><td>Municipal</td><td>4</td><td>Municipal</td><td>4</td></tr>
<tr><td>Duration</td><td>Short</td><td>2</td><td>Short</td><td>2</td></tr>
<tr><td>Frequency</td><td>Regular</td><td>4</td><td>Regular</td><td>4</td></tr>
<tr><td>Intensity</td><td>Medium to low</td><td>2</td><td>Low</td><td>1</td></tr>
<tr><td>Severity</td><td>Medium</td><td>8</td><td>Medium</td><td>7</td></tr>
<tr><td>Consequence</td><td>Medium</td><td>12</td><td>Medium</td><td>11</td></tr>
<tr><td>Probability</td><td>Probable</td><td>4</td><td>Plausible</td><td>3</td></tr>
<tr><td>Impact Significance</td><td>Medium - High</td><td>16</td><td>Medium</td><td>14</td></tr>
<tr><td>Mitigation</td><td colspan="4">Difficult</td></tr>
<tr><td>Confidence</td><td colspan="4">High</td></tr>
<tr><td>Reversibility</td><td colspan="4">Possible</td></tr>
</table>
</td></tr>
<tr><td>Mitigation Measures</td><td>Planning, Construction, and Operational

Put in place genera/ hazardous waste management measures

</td></tr>
<tr><td>No go alternative</td><td>Baseline conditions will remain the same – no waste generation; site is currently vacant</td></tr>
</table>

SOCIAL IMPACTS

The site is situated within the Mossel Bay Local Municipality, Garden Route District of the Western Cape Province. The National Development Plan, 2012 identifies ten critical actions for implementation; the following are identified as relevant to the proposed development:

- Social compact to reduce poverty and inequality, and raise employment
- Boost private investment in labour-intensive areas, competitiveness and exports, with adjustments to lower the risk of hiring younger workers
- Public infrastructure investment at 10 % of GDP, financed through tariffs, public-private partner- ships, taxes and loans and focused on transport, energy and water.
- Interventions to ensure environmental sustainability and resilience to future shocks.
- New spatial norms and standards – densifying cities, improving transport, locating jobs where people live, upgrading informal settlements and fixing housing market gaps.

The Western Cape Government has identified priorities as its contributions to the realization of the aims and objectives of the National Development Plan (NDP) over the five-year term; the following are identified as relevant to the proposed development:

- Growth and jobs and Increasing investment - Building and maintaining infrastructure; Growing the economy through exports growth; Creating opportunities for job creation through skills development; Creating an enabling environment for economic growth through resource resilience
- Empowering people education and learning
- Mobility and spatial transformation - creating spatially and economically vibrant growth points

Ward-based planning was introduced under the third generation IDP for the MBM as a new dimension towards integrated planning and seeks to deepen public participation in Municipal matters. The population of Mossel Bay is 96 114 people in 2021 making it the second most populated municipal area in the Garden Route District. This total is expected to grow to 97 514 by 2025, equating to an average annual growth rate of 0.4 per cent (Western Cape Provincial Treasury SEP, 2021). The annual income for households is divided into three categories, namely the proportion of people that fall within the low, middle- and high -income brackets. Poor households fall under the low-income bracket, which ranges from no income to R38 200 annually (R3 183 per month). An increase in living standards can be demonstrated by a rising number of households entering the middle- and high-income brackets.

Approximately 52,8% of households fall within the low-income bracket, of which 17.4% have no income. Less than 50% of households fall within the middle to higher income categories, split between 39,2% in middle income group and 8.1% in the higher income group. A sustained increase in economic growth is needed if the 2030 NDP income target of R110 000 per person, per annum is to be achieved (StatsSA, 2016).

The PACA process identified several transversal development proposals which are of strategic importance to all sectors of the local economy. Included in these and of relevance to the proposed development includes: Industrial Parks;

- Break the dependency on Eskom Electivity and going green;
- Upfront costs are high for developers (Bulk Infrastructure and Capital Contributions);
- Innovative building methods & alternative energy sources;

Industrial parks are identified in the IDP (2022 – 2027) as an LED PRIORITIES IDENTIFIED BY COUNCIL AND EXECUTIVE MAYOR

Activity	**Planning for construction and operation of the proposed warehouse storage and light industrial workshops**
Layout	Proposed SDPs and bulk services (Appendix B)
Phase	**Planning, Construction; Operational**
Aspect	**Construction Phase**
Impact	**Employment creation and skills development**
Nature of Impact	**Direct / Indirect**

Description of Impact	**The proposed development will contribute to the creation of direct employment opportunities and skills development through the creation of construction jobs for local contractors and labourers and suppliers of required services. Indirect employment could be created using various materials required for the construction phase. A few permanent positions are likely to be created during operational phase.**

Impact Rating

Impact Status	**Positive**		**Positive**	
	Without mitigation		With mitigation	
Spatial	Municipal	4	Municipal	4
Duration	Short to medium	3	Short to medium	3
Frequency	Infrequent	2	Infrequent	2
Intensity	Low	1	Low to medium	2
Degree	Low	6	Low	7
Consequence	Medium	10	Medium	11
Probability	Probable	4	Probable	4
Impact Significance	**Medium**	**14**	**Medium**	**15**
Mitigation	Possible			
Confidence	High			
Reversibility	Possible			

Mitigation Measures	**Planning, Construction, and Operations** • Use local labour. • Use local suppliers of required materials and services where possible. • Advertise locally making use of local resources for this purpose. • Use reputable agencies / avenue (i.e. Department of Labor) to screen staff employed. • Weekly toolbox talks to be held to upskill labour force during construction
No go alternative	**Baseline conditions will remain the same – no additional local economic opportunities**
Phase	**Construction Phase**
Aspect	**Criminal activities**
Nature of Impact	**Direct**
Description of Impact	**Risk of crime has negative social and / or economic consequences -** The level of crime in South Africa does not only have a significant impact on the livelihood of citizens but also affects the general economy. Crime hampers economic growth by discouraging investment and capital accumulation. If not addressed decisively, it leads to social and economic disparity. Poor lighting and alien vegetation on the property can lead to use of the site for criminals; measures must be put in place to ensure safety and security during construction and operational phases.

Impact Rating

Impact Status	**Negative**		**Negative**	
	Without mitigation		With mitigation	
Spatial	Activity	1	Activity	1
Duration	Very short	1	Very short	1
Frequency	Seldom	3	Infrequent	2
Intensity	Medium	3	Low to medium	2
Severity	Medium	7	Medium	5
Consequence	Medium	8	Medium	6

	Probability	Plausible	3	Plausible	3
	Impact Significance	**Medium**	**11**	**Low**	**9**
	Mitigation	Possible			
	Confidence	High			
	Reversibility	Possible / Difficult			

Mitigation Measures	• There must be strict access control to and from the site. • A security guard should be stationed on site for the duration of the construction phase and guard the site 24 / 7. • Movement of all personnel and workers must be limited to areas under construction. • Access to surrounding areas is not permitted. • No employment to take place on site. Employment should take place through reputable recruitment agencies / avenues. • No cash wages to be paid on site. • Restrict employment to local residents as far as possible. • No weapons / alcohol / narcotics allowed on site • Severe contractual fines imposed for personnel / contract workers bring weapons / alcohol / narcotics on site.
Phase	**Operational phase**
Aspect	**Criminal activities**
Nature of Impact	**Direct**
Description of Impact	**Criminal activities during operations**

Impact Rating					
	Impact Status	**Negative**		**Negative**	
		Without mitigation		With mitigation	
	Spatial	Site	2	Site	2
	Duration	Very short	1	Very short	1
	Frequency	Seldom	3	Infrequent	2
	Intensity	Low to medium	2	Low to medium	2
	Severity	Medium	6	Medium	5
	Consequence	Medium	8	Medium	7
	Probability	Plausible	3	Plausible	3
	Impact Significance	**Medium**	**11**	**Low**	**10**
	Mitigation	Possible			
	Confidence	High			
	Reversibility	Possible / Difficult			

Mitigation Measures	• There must be strict access control to and from the development. • Ensure a security measures are in place (i.e. cameras, security guard)
No go alternative	**Baseline conditions will remain the same**

TRAFFIC MANAGEMENT

Element Consulting Engineers (ECE) have prepared a traffic impact statement for the proposed development. The proposed development envisages the development of 183 long term personal storage units (mini storage units) and 40 light industrial manufacturing workshops. The property is located inside the urban edge. The site is bound by the N2 freeway to the south, agricultural land to the east and west, Great Brak River WWTW to the south-west and industrial development to the north.

The site is intersected east-west by Sandhoogte Rd (DR1583), a low order (class 4) provincial divisional road,
The site is intersected north-south by Sorgfontein Rd (DR1578), a low order (class 4) provincial divisional road.
No official public transport routes are located close to the proposed development, although minibus taxis do utilize Sorgfontein Rd (DR1578) and Sandhoogte Rd (DR1583) on an unofficial basis.
Access to portions 1&4 (eastern sections) of the development is proposed from Sandhoogte Rd (DR1583), at a point approximately 107m east of the intersection with Sorgfontein Rd (DR1578).
Access to portions 2 and 3 (western sections) of the development is proposed from Sandhoogte Rd (DR1583), at a point approximately 117m west of the intersection with Sorgfontein Rd (DR1578).
Sight distances at both proposed access points are acceptable in both directions in both the horizontal and vertical alignments with the condition that the overgrown bush be trimmed for the complete road reserve width.
The site shall provide for heavy vehicles as this is a light industrial development.
The road width will be 6.0m on main access streets and 5.2m on minor internal streets. All minimum radii at bellmouths will be 7m. The material proposed is:
Subgrade material CBR of 15-20.
Subbase material CBR of minimum 45 – obtained from commercial sources.
25mm Asphalt surfacing, alternatively 80mm concrete block paving.

The minimum road grade will be 0.45% with 2% crossfall.
The design speed will be 30km/h on all roads except the main access road with a design speed of 40km/h.

From a traffic engineering perspective, the surrounding area is a low growth area with agricultural land to the east and west and industrial land to the north with little development taking place in the immediate surrounds.
The traffic impact statement of the proposed development evaluated the three intersections affected by the development and are the following:

1. Intersection 1: Development access (east) / Sandhoogte Rd (DR1583)
2. Intersection 2: Sorgfontein Rd (DR1578) / Sandhoogte Rd (DR1583)
3. Intersection 3: Development access (west) / Sandhoogte Rd (DR1583)

The impact of the proposed development was evaluated for the weekday morning and afternoon peak hours. The assessment years are for the:

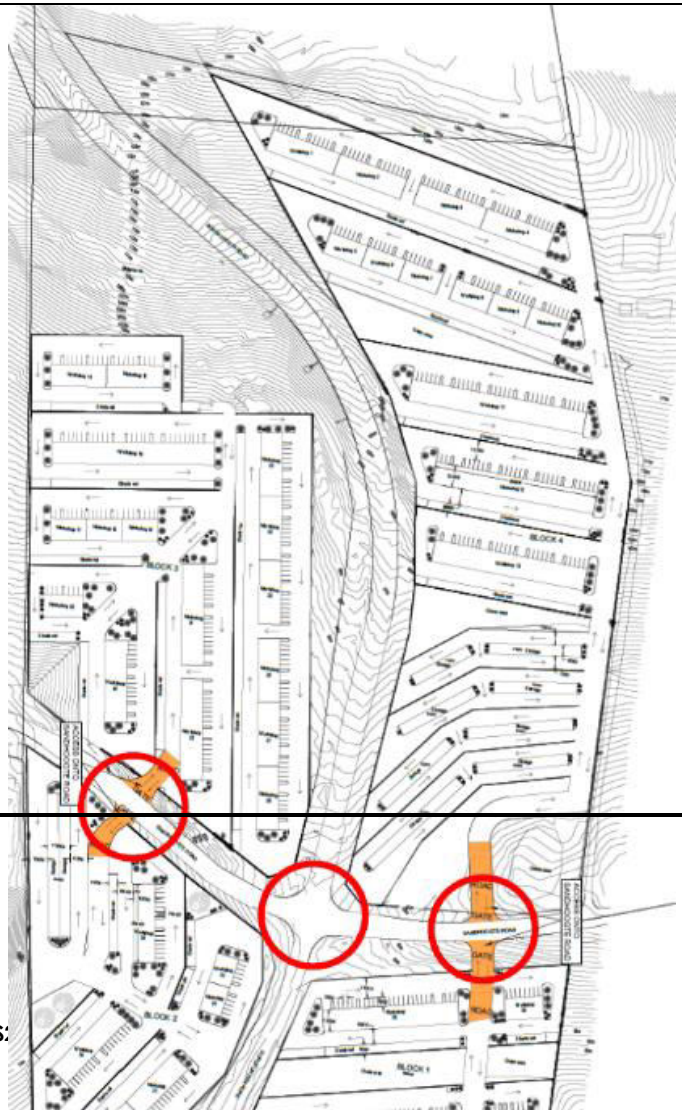
1. Base year 2025.
2. Horizon year 2030.

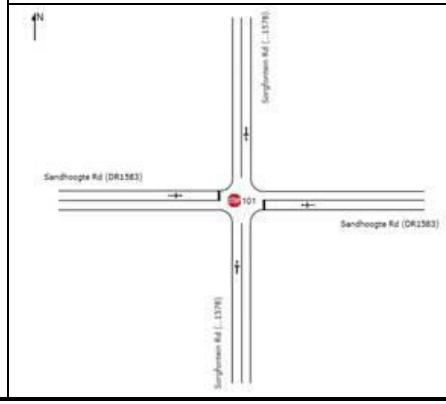
The study area is classified as an average growth area and a growth rate of 3.5% per annum was applied to obtain the horizon year traffic volumes. Trip generation rates for the proposed development were determined in accordance with the TMH17 South African Trip Data Manual. The peak hour trip generation of the proposed development during respectively the morning and afternoon peak hour of the adjacent road network is 131 (99 in / 32 out) (AM) and 131 (32 in / 99 out) (PM). The capacity analysis was performed by means of the Sidra Intersection 8.0 software to compare the impact of the development against the background traffic.
Intersection 1: Sandhoogte Rd (DR1583) & Development Access (Rd 1 & 4) - The proposed intersection is not currently in existence. The proposed development access geometry consists of a single lane shared left/through/right in both access road approaches (side road stop controlled). This geometry is shown in the figure below and was used in the analysis of the intersection. The results of the analysis indicate that the development has a negligible impact on the Level of Service during both the morning and afternoon horizon year 2030 peak hours and the intersection will continue to operate at a Level of Service A for both the morning and afternoon peak hours.

Intersection 2: Sorgfontein Rd (DR1578) / Sandhoogte Rd (DR1583) - The existing intersection geometry consists of a shared left, through and right lane in all 4 approaches with side road stop control on Sandhoogte Rd (DR1583). This geometry is shown in the figure below and was used in the analysis of the intersection. The results of the analysis indicate that the development has a negligible impact on the Level of Service during both the morning and afternoon horizon year 2030 peak hours and the intersection will continue to operate at a Level of Service A for both the morning and afternoon peak hours.

Intersection 3: Sandhoogte Rd (DR1583) & Development Access (Rd 2 & 3) - The proposed intersection is not currently in existence. The proposed development access geometry consists of a single lane shared left/through/right in both access road approaches (side road stop controlled). This geometry is shown in the figure below and was used in the analysis of the intersection: The results of the analysis indicate that the development has a negligible impact on the Level of Service during both the morning and afternoon horizon year 2030 peak hours and the intersection will continue to operate at a Level of Service A for both the morning and afternoon peak hours.

The necessity of a right turn lane is not triggered in this analysis for any of the intersections or approaches.





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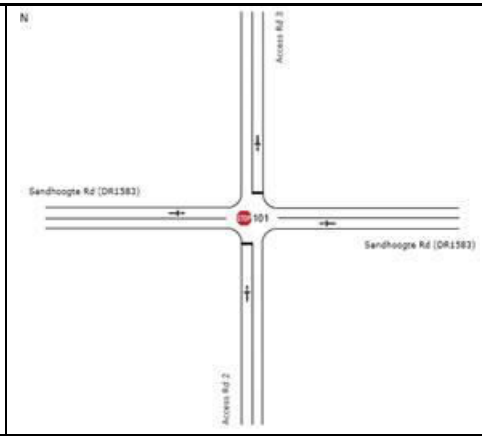


Figure 14: road intersections assessed (TIA provided in appendix H2)

Activity	**Planning for construction and operation of the proposed warehouse storage and light industrial workshops**
Layout	Proposed SDPs and bulk services (Appendix B); TIA (Appendix H4)
Phase	**Construction Phase**
Aspect	**Personnel vehicles, construction vehicles, deliveries / collections, machinery**
Nature of Impact	**Direct**
Description of Impact	**Impact on other road users**

Impact Rating

Impact Status	**Negative**		**Negative**	
	Without mitigation		With mitigation	
Spatial	Site	2	Site	2
Duration	Very short	1	Very short	1
Frequency	Infrequent	2	Rare	1
Intensity	Low to medium	2	Low to medium	2
Severity	Low	5	Low	4
Consequence	Low	7	Low	6
Probability	Plausible	3	Plausible	3
Impact Significance	**Low**	**10**	**Low**	**9**
Mitigation	Possible			
Confidence	High			
Reversibility	Likely			

- Mitigation Measures

Design and planning

- Internal roads and access to be constructed first in the sequence of construction activities
- Access gate configuration & stacking distance - A minimum stacking distance of 2 light vehicles or one heavy vehicle or 15m is required at the access gate. The gate design shall provide for access for heavy vehicles and emergency vehicles. It is proposed that separate access lanes (gates) be provided for tenants and visitors.
- Sight Distances - Sight distances at both proposed access points are acceptable in both directions in both the horizontal and vertical alignments with the condition that the overgrown bush be trimmed for the complete road reserve width.
- Ensure the western access road is equipped with suitable measures to allow drainage to the SW pond adjacent to the access road (e.g, small culvert or similar)

	• All engineering designs be performed by a registered professional engineer and submitted to the municipality for approval in line with a signed services agreement, prior to construction **Construction** • Keep to a single access point • Put appropriate road and construction signage in place. • Road signage should be erected and provided to full municipal standards. • Ensure strict access control to and from the construction site. • All construction vehicles are to be monitored to ensure they are not overly full so the likelihood of spillage of debris is prevented. • Any loose materials transported to / from site must be covered. • Surrounding area and roads should be monitored for debris and materials associated with the proposed development and cleaned up a soon as such becomes apparent. • All materials to be delivered in a safe manner at designated delivery area located within footprint of the development site; ensure sufficient space is allocated in the construction site plan to provide safe turning for larger trucks. • Speed travelled by construction vehicles must be kept to a minimum and speed limits enforced (30km internal roads / 40 km access roads). • No transport of construction machinery / materials to or from the site to take place on public holidays or weekends. **Operations** • Ensure maintenance of vegetation to maintain safe sight distance at access points
No go alternative	**Baseline conditions will remain the same – no additional traffic impact**

ELECTRICITY USE

The bulk electrical supply will be supplied from the Mossel Bay Municipality's (MBM) Midbrak 11/11kV Substation, via the existing 11kV, 120mm2 copper underground cable. This cable is currently installed along the Sandhoogte Road, between the Grootbrak WWTW's minisub and the Sandhoogte Booster Pump Station. The cable has a current-carrying capacity of 4.75 MVA (@11kV). Furthermore, it has been confirmed with the MBM's Electrical Personnel that this feeder is currently very lightly loaded and does have spare capacity of at least 1 MVA available, which could be utilized for the planned development. The estimated diversified load of the total development, in line with the above design criteria, is estimated to be 613 kVA. For this reason, it is recommended that 630kVA minisub be supplied for development.

It is noted that energy saving, and green building design measures are proposed to be incorporated into this development. The final designs are recommended to be reviewed by an EAP / appointed ECO to confirm best practice energy saving measures are incorporated, with a view to keep night lighting to a minimal to reduce visual lighting impacts on the area.

Activity	**Planning for construction and operation of the proposed warehouse storage and light industrial workshops**
Layout	Proposed SDPs and bulk services (Appendix B)
Phase	**Planning and Operational Phase**
Aspect	**Electric demand**
Nature of Impact	**Direct / cumulative**
Description of Impact	**Depleting non-renewable energy resources is a global problem. Energy capacity in South Africa has often failed to meet energy demands. The impact of the development on energy resources is low and the impact can be reduced by putting in relevant measures to reduce the demand on the National Grid.**
Impact Rating	

Impact Status	**Negative**		**Negative**	
	Without mitigation		With mitigation (preferred design)	
Spatial	Activity	1	Activity	1

	Duration	Medium to long	5	Medium to long	5
	Frequency	Often	5	Often	5
	Intensity	Low to medium	2	Low	1
	Severity	Medium high	12	Medium high	11
	Consequence	Medium high	13	Medium	12
	Probability	Plausible	3	Slim	1
	Impact Significance	Medium high	16	Medium	13
	Mitigation	Possible			
	Confidence	High			
	Reversibility	Difficult – make use of renewable energy as far as possible			

Mitigation Measures	**Planning and operations**
	• Design and layouts includes measures to reduce operational energy consumption as far as possible
	• SLA in place prior to site clearing
	• The following measures are recommended to be incorporated into the design to reduce energy demands on the grid:
	  ○ Solar panels
	  ○ Energy efficient lighting
	  ○ Energy saving materials				

No go alternative	**Baseline conditions will remain the same – negligible impact on energy use; site is currently vacant**				

SEWAGE MANAGEMENT

Element Consulting Engineers have compiled a bulk engineering services report for the proposed development. The Average Dry Weather Flow (ADWF) created by the proposed development, in line with the above discussions, criteria and standards, is calculated at approximately 51kl/day. The design peak flow, inclusive of a specified peak factor of 3.5, as well as extraneous flow, will be calculated during the detail design stage. The Great Brak River WWTW has recently been upgraded and has sufficient capacity to accommodate this development.

The internal sewer network for this development is divided into four drainage zones by Sandhoogte Road and Sorgfontein Road:

Drainage zone A (north-east depicted in orange) drains to the south-west to the Sandhoogte/Sorgfontein intersection. A small section of zone A, designated zone A2, situated on the southern portion of zone A, can not gravitate to the WWTW and storage units will be developed here with no sewer infrastructure.

Drainage zone B (south-east and depicted in green) drains to the north-west to the Sandhoogte/Sorgfontein intersection.

Drainage zone C (south-west and depicted in purple) drains to the north-western corner of zone C, where it will connect into the main municipal sewer line flowing into the WWTW. Drainage zones A and B flow into drainage zone C at the Sandhoogte/Sorgfontein intersection.

Drainage zone D (north-west and depicted in blue) drains to the south-west, underneath Sandhoogte Road and into the corner of drainage zone C.

Sewer from the development will drain to the south-western boundary where it will connect into the main municipal sewer line flowing into the Great Brak River WWTW.

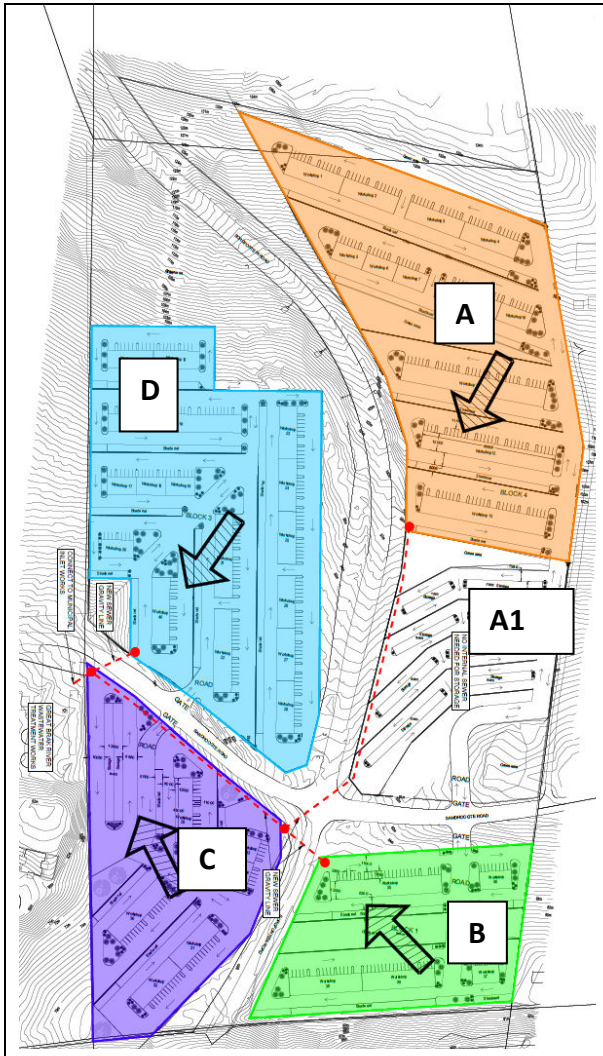


Figure 15: Sewage drainage zones (full plans provided in Appendix B)

Activity	**Planning for construction and operation of the proposed warehouse storage and light industrial workshops**
Layout	Proposed SDPs and bulk services (Appendix B)
Phase	**Construction and Operational Phase**
Aspect	**Sewage treatment and pipelines**
Nature of Impact	**Cumulative**
Description of Impact	**Cumulative impact on capacity of WWTW and supporting infrastructure. The developer can ensure strict control of what is disposed into the system from the site and ensure all**

	infrastructure on the site is adequately installed and suitably maintained.
Impact Rating	

Impact Status	**Negative**		**Positive**	
	Without mitigation		With mitigation	
Spatial	Activity	1	Activity	1
Duration	Very short	1	Very short	1
Frequency	Infrequent	2	Rare	1
Intensity	Medium	3	Low to medium	2
Severity	Low	6	Low	4
Consequence	Low	7	Low	5
Probability	Probable	4	Plausible	3
Impact Significance	**Medium**	**11**	**Low**	**8**
Mitigation	Likely			
Confidence	High			
Reversibility	Possible			

Mitigation Measures	• Connection to sewage treatment reticulation to Groot Brak WWTW is recommended to be completed first in the sequence of construction events • SLA in place prior to site clearing • Until such time as connections and ablutions are in place, provide ablution facilities at a ratio of 1:15 and service regularly by a reputable service provider who disposes at licensed WWTW site and keep proof of service. • Secure portable toilets to prevent them from being blown over during construction phase. • Maintain all sewage infrastructure as required and incorporate into maintenance management plan for the site, this must include items (such as nappies and wet wipes and hazardous materials that may not enter the sewage reticulation system as per light industrial zoning requirements and permissible activities)
No go alternative	**Baseline conditions will remain the same – negligible impact on WWTW as site is currently vacant with no sewage generation**

WATER MANAGEMENT

Element Consulting Engineers have compiled a bulk engineering services report for the proposed development.

Water requirements of the site is calculated as follows:

Workshops – 300l/100m2 GLA/day

Storage units – no water connections

The bulk water Average Annual Daily Demand (AADD) for this proposed development, in line with the above discussions, design consumptions, assumptions, criteria and standards, is calculated at approximately 56kl/day. The bulk services report states that bulk water is available for this proposed development. It is recommended to incorporate rainawater tanks into the development due to the large roof area on the site. This can augment water supply required for industrial workshops and can also catch water during rainfall events assisting with alleviating the amount of stormwater generated by the site due to removal of vegetation on approximately 14 ha and replacing this area with hard surfaces.

Activity	**Planning for construction and operation of the proposed warehouse storage and light industrial workshops**
Layout	Proposed SDPs and bulk services (Appendix B)
Phase	**Planning, Construction, operations**
Aspect	**Water use**
Nature of Impact	**Direct**

Description of Impact	**Careful management of water use should result in a low to negligible impact on water availability**

Impact Rating

Impact Status	**Negative**		**Negligible**	
	Without mitigation		With mitigation	
Spatial	Activity	1	Activity	1
Duration	Medium to long	4	Medium to long	4
Frequency	Seldom	3	Infrequent	2
Intensity	Low to medium	2	Low	1
Severity	Low	9	Low	7
Consequence	Low	10	Low	8
Probability	Plausible	3	Slim	1
Impact Significance	**Medium**	**13**	**Low**	**9**
Mitigation	Possible			
Confidence	High			
Reversibility	Possible			

Mitigation Measures

Planning, construction, operations

- Water requirements to be calculated by resident engineer and sources of water to be confirmed prior to the start of construction.
- Avoid leaking taps and pipes / unnecessary water waste.
- Connection to bulk services (water and sewage) is recommended to take place first in sequence of events
- Rainwater tanks are recommended to be incorporated into the design to enable reuse of this water to reduce water demand and reduce stormwater runoff during rainfall events
- SLA in place prior to site clearing

No go alternative	**Baseline conditions will remain the same – wwtw will not be developed and pollution from current sewage systems will continue**

CHANGE IN LAND USE

The site is currently vacant and was previously used for crop farming. The site has been vacant since 2014. The site is considered to be an infill development as development will take place on a site between existing developed portions and therefore bulk municipal services are already in place in close proximity to the site. Infill developments considered to be a positive economic benefit to the local municipality due to additional rates and taxes being generated without the burden of additional capital outlay which is expected to strengthen the financial sustainability of the municipality in both the short- and longer term. The change In landuse from agricultural 1 (currently vacant and not used for agricultural activities) to mixed / light industrial is considered be positive impact of low significance on the local area. The site is in a degraded site adjacent to WWTW and south of the industrial development and therefore a preferred site for the proposed development. This development proposal is preferred over high intense brick making operation. The northern mapped CBA is recommended to be kept out of the development footprint and the artificial pond retains for stormwater management form the road (Appendix D4)

Activity	**Planning for construction and operation of the proposed warehouse storage and light industrial workshops**
Layout	**Alternative SDP in bulk services report (Appendix B)**
Phase	**Planning, Construction, operations**
Aspect	**Infill development entailing light industrial zone for warehouses and workshops**
Nature of Impact	**Direct / indirect**
Description of Impact	**Change in land use of the site in question is considered to be an overall positive impact of low significance to the area.**

Impact Rating	**Impact Status**	**Positive**			
	Spatial	Site	2		
	Duration	Long term	5		
	Frequency	Rare	1		
	Intensity	Low	1		
	Severity	Low	7		
	Consequence	Low	9		
	Probability	Slim	1		
	Impact Significance	**Low**	**10**		
	Mitigation	As per EMPr			
	Confidence	High			
	Reversibility	Possible			
Mitigation Measures	**Planning, construction, operations** • Budget correctly for the implementation of the recommendations contained within the EMPr • Implement EMPr				
No go alternative	**Baseline conditions will remain the same**				

7 SPECIALIST INPUTS/STUDIES AND RECOMMENDATIONS

Please note: Specialist inputs/studies that will be undertaken as part of this application. These specialist inputs/studies must take into account the Department's relevant Guidelines on the Involvement of Specialists in EIA Processes available on the Department's website (**http://www.capegateway.gov.za/eadp**). A summary of all the specialist inputs/studies must be provided with the additional information.

Specialist inputs/studies and recommendations:

Retain ponds as part of SW management on site as per SDP 3 (Appendix B4)
Carry out search and rescue prior to construction and keep plants for landscaping and rehabilitation.
Develop and implement fire prevention and response management plan
Ongoing alien invasive clearing throughout construction and operations
Incorporate solar panels to reduce need on non-renewable fossil fuels
Incorporate SUDS (i.e. permeable pavers, rainwater tanks) to augment water use requirements and reduce runoff generated during rain events.

8 IMPACT ASSESSMENT SUMMARY

Briefly describe the impacts (as appropriate), significance rating of impacts, mitigation and significance rating of impacts of the activity. This must include an assessment of the significance of all impacts.

Impacts	Significance rating of impacts after mitigation (Low, Medium, Medium-High, High, Very High):
Refer to Table 3	

Table 3: Impact assessment Summary

PLANNING					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Planning and Design				
Aspect	EA and budget allocation for requirement management measures				
Nature of Impact	Direct – Project delays and economic consequences				
Description of Impact	Commencement prior to required approvals in place can lead to delays in project and economic loss; insufficient budget allocation to environmental management can result in impacts before mitigation.				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium High	17	Negative Low	10
HERITAGE ARCHAEOLOGY AND PALEONTOLOGY					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction and operations (as required for maintenance)				
Aspect	Excavation activities				
Nature of Impact	Direct – loss of historical resources				
Description of Impact	Loss of paleontological &/or archaeological resources - The DFFE screening tool report indicates a very high sensitivity for palaeontological, and low sensitivity				

	for archaeological and cultural heritage. a NID and accompanying assessment will be submitted to Western Cape Heritage				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Low	10	Positive Low	10
No-go alternative	Baseline conditions will remain the same – negligible impacts on heritage resources.				
TERRESTRIAL BIODIVERSITY					
The entire project area was utilised for agriculture for at least 50 years and then left fallow since about 2014. A portion of terrestrial CBA remain in the NW and SW corners of the site. The NW CBA section of the site has mostly been avoided in the alternative SDP due to steep terrains; however, the development is recommended to be shifted completely out of this area, which will require a slight reduction in the hard development footprint (2500m2) in this NW area (As per SDP in Appendix D4). Impacts associated with the Terrestrial Biodiversity Theme are considered to be low to negligible in the specialist report; the underlying drivers of the CBA and 2017 ESA status of a portion of the project area, are not present					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction and operations (as required for maintenance)				
Aspect	Construction activities – site clearing, earthworks, excavations, lay down areas				
Nature of impact	Direct - Disturbance of terrestrial biodiversity and ecological processes on the site				
Description of Impact	Construction activities can result in disturbances outside the development footprint and impacts on ecological processes and terrestrial biodiversity				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium	14	Negative Low	7
Phase	Operational				
Aspect	Operational activities –maintenance				
Nature of Impact	Disturbance to terrestrial biodiversity and ecological processes				
Description of Impact	Poor management practices can result in impacts to surrounding natural areas and ecological processes.				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative medium	14	Negative Low	7
INDIGENOUS VEGETATION AND SPECIES OF CONSERVATIONAL CONCERN					
Due to the historical clearance of vegetation over a prolonged period, and the disturbance of the soil and seedbank, these areas are unlikely to have a species composition representative of the original habitat (SANBI, 2020). The vegetation of the project area has been classified as 'secondary shrubland'.					
Activity	Past agricultural activities (estimated 1963 until 2014)				
Layout	NA				
Phase	Operations				
Aspect	Crops				
Nature of impact	Direct / cumulative - Loss of indigenous vegetation and disruption to associated fauna, habitats and forage areas				
Description of Impact	Past agricultural activities (estimated 1963 until 2014) resulted in loss of indigenous vegetation and SCC - The loss of the entire project area (18.5 ha) would constitute a habitat loss of 0.002% for identified plant SCC.				
Impact Rating		Without mitigation		With mitigation – not applicable	

	Impact Significance	Negative Medium high	17		
Activity	Clearing activities by Ideal training in 2020 on SW portion				
Layout	SW portion (2.5 ha)				
Phase	Construction				
Aspect	excavation				
Nature of impact	Direct - Loss of indigenous vegetation and disruption to associated fauna, habitats and forage areas				
Description of Impact	Loss of secondary shrubland and indigenous pioneer species. The loss of the disturbed area (2.5 ha) would constitute a habitat loss of 0.0002% for identified plant SCC.				
Impact Rating		Without mitigation		With mitigation – not applicable	
	Impact Significance	Negative Medium	12		
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction				
Aspect	Site clearing and construction activities on 18 ha				
Nature of Impact	Direct – Loss of indigenous vegetation on 18 ha and potential loss of SCC				
Description of Impact	Site clearing will result in loss of indigenous vegetation and could result in loss of SCC. Loss of vegetation is a permanent impact. The site will be completely transformed to a light industrial / storage warehouse area.				
Impact Rating		Without mitigation		With mitigation (including recommendations for layout 3)	
	Impact Significance	Negative Medium	13	Negative Low	10
Phase	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Aspect	Alternative SDP in bulk services report (Appendix B)				
Nature of Impact	Operations (as required for maintenance)				
Description of Impact	Poor maintenance activities during operational phase can result in the permanent or temporary loss of indigenous vegetation, and SCC species.				
Impact Rating		Without mitigation		With mitigation (including recommendations for layout 3)	
	Impact Significance	Low	9	Low	7
No go alternative	Baseline conditions will remain the same – negligible impacts on flora due to no clearing and current status quo (secondary vegetation) will remain with potential impacts of AIS growth, cattle grazing and illegal dumping on the site				

FAUNA HABITATS AND FAUNA SPECIES	
The project area is fenced and fragmented by two main roads, creating barriers for larger animals. The vegetation of the project area is fairly uniform with limited diversity of faunal habitats.	
Activity	Mixed / light industrial
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)
Phase	Construction
Aspect	Site layout, site clearing, construction activities -loss of habitat and forage area will be permanent

Nature of Impact	Direct / indirect / cumulative- Loss of faunal habitats, processes, and SSC				
Description of Impact	Construction activity may result in the loss of habitat for faunal species, which could result in disturbance and displacement of faunal species, impact on faunal processes, loss of faunal SSC				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Low	10	Negative Low	7
No go alternative	Baseline conditions will remain the same – no disturbance to faunal habitats / foraging areas and fauna on site				
ALIEN INVASIVE SPECIES					
Twelve (12) AIS were recorded within the project area. For the purposes of this development, all Category 1b and 2 species listed under NEM:BA and all Category 1 and 2 species listed under CARA need to be removed, and ongoing follow up measures implemented to ensure AIS do not return.					
Activity	Mixed / light industrial				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction / operations				
Aspect	Alien invasive plant species				
Nature of Impact	Direct / indirect and cumulative – Increase in alien invasive vegetation				
Description of Impact	Construction sites often lead to seeding of AIS common to the area because the soils are bare and disturbed and therefore easy for seeds to be lodged. Ongoing AIS is recommended throughout construction and operational phase. Ongoing removal of AIS as soon as detected and keeping open space areas free of AIS can be a positive impact. Ongoing clearing will be particularly important in all the stormwater pond and open space areas; AIS establish and grow quickly in drainage areas.				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium High	17	Negative Low	8
No go alternative	Baseline conditions will remain the same – secondary vegetation and AIS				
FIRE RISK					
Vegetation on site is representative of degraded Garden Route Granite Fynbos (north section) and Hartenbos Dune Thicket. The site and surrounding areas appear to be degraded landscapes due to agricultural activities. Fynbos is a fire driven ecosystem where thicket vegetation is less prone to fire than fynbos because it is more succulent. The majority of the vegetation on site will be cleared, with remaining open space / vegetated areas including the stormwater management pond areas, the steep area which coincides with the WC BSP CBA in the northern sections and the 5 meters between the erf boundary and the development. The National Veld and Forest Fire Act (Act 101 of 1998) specifies the need for landowners to manage fires with suitable fire breaks and clearing of AIS.					
Activity	Mixed / light industrial				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction / operations				
Aspect	Fire risks				
Nature of Impact	Direct				
Description of Impact	Without interventions to prevent / control potential fire outbreaks, damage to surrounding biodiversity and infrastructure could occur				
Impact Rating		Without mitigation		With mitigation	

	Impact Significance	**Negative Medium**	**14**	**Negative Low**	**8**
No go alternative	Baseline conditions will remain the same – presence of AIS and high fire risk.				

SOIL

The soils on the northern section of the site are characterised by Prismacutanic and/or pedocutanic diagnostic horizons dominant. With geology characterised by conglomerate, sandstone, siltstone and mudstone of the Enon Formation, Uitenhage Group. The soil erodibility of this portion is considered to be moderate. The soils on the northern section of the site are characterised by Grey regic sands and other soils. With geology characterised by Mainly fixed dunes, dune rock and aeolian sand. The soil erodibility of this portion is considered to be High. Blanket clearing must be avoided to prevent excessive dust, wind and water erosion. Topsoil is to be stockpiled separately. Where large areas are exposed, the site will need to be watered during windy condition to prevent loss of soil and dust generation.

Activity	Mixed / light industrial				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction, Operational Phase				
Aspect	Site clearing, general construction activities, bare soil, stockpiling, general maintenance activities				
Nature of Impact	Direct - Loss of soil; damage to soil structure, erosion, dust generation				
Description of Impact	Loss of soil can be caused due to poor management (stockpiling, excavations, vehicle entrainment) resulting in erosion and dust generation.				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium	13	Negative Low	7
No go alternative	Baseline conditions will remain the same – no damage or loss of soil due to no construction disturbances.				

AQUATIC SYSTEMS

The project area falls within the Breede-Gouritz Water management Area, within Primary Catchment K (Kromme) area and in quaternary catchment K10F. The site does not fall within a sub-quaternary catchment (SQC) that has been categorised as a Freshwater Ecosystem Priority Area (FEPA) or a Strategic Water Source Area (SWSA). According to the National Wetland Map 5 (Van Deventer et al. 2018), there are no wetlands within a 500m radius of the site. The NFEPA does indicate the presence of artificial wetlands, confirmed to be farmers dams, with one in the south western section and the other being situated within the northern mapped CBA which will not be developed due to steep terrain. It is recommended that the development moves completely out of the mapped CBA (estimated 2500m2) will require a slight shift in the SDP (alternatives 1 and 2). There are no natural aquatic features that will be impacted by the project. Additionally, the development layout was amended to avoid the two artificial features.

Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction and Operational Phase				
Aspect	Construction activities, operational and maintenance activities				
Nature of Impact	Direct – Disturbance / Loss of aquatic habitat and species				
Description of Impact	Loss of habitat and SCC. No natural wetlands are mapped on the site and the site is not expected to impact on natural wetlands occurring to the east of the site with mitigation in place. The artificial wetland occurring in the northern mapped CBA (WCBSP) should be kept as it currently provides a service to the site and will offer suitable conditions of flora and fauna; this area should not be disturbed during construction or operations. The farmers dam in the east will be retained as a swmp. An additional pond will be added on the western section. is recommended the SWM ponds are design to cater for 1: 100 stormwater events.				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Low	10	Negative Low / Negligible	7

Layout	Alternative SDP and stormwater management plan in bulk services report (Appendix B)				
Phase	Construction and Operational Phase				
Aspect	Construction activities, operational and maintenance activities				
Nature of Impact	Direct - Increase in runoff				
Description of Impact	The moderate gradient and creation of hard surfaces will increase the amount of runoff generated on the site which could result in transportation of sediment / pollutants if runoff is not adequately managed throughout construction and operations.				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium	16	Negative Low	10
No-go Alternative	Baseline conditions remain				
VISUAL IMPACTS					
Mismanaged construction sites can result in windblown litter, spillages and overflowing waste, all which have a negative visual impact on receptors. Light pollution is of global concern given that our night skies are getting lighter due to urban development and that many animals are specifically adapted to dark night skies for navigation, foraging and behavioural aspects (i.e. sleep, hunting).					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Construction				
Aspect	Housekeeping				
Nature of Impact	Direct / cumulative – construction				
Description of Impact	Mismanaged construction sites can result in negative visual impact on receptors				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium	14	Negative Low	10
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Operations				
Aspect	Lighting / housekeeping				
Nature of Impact	Direct / Cumulative – light pollution on biodiversity and residents; incorrect housekeeping will lead to visual impacts on receptors				
Description of Impact	Light pollution can lead to disruption of natural and social behaviour.				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium	14	Negative Low	10
No go alternative	Baseline conditions will remain the same – no visual impacts as a result of construction or operational activities				
NOISE IMPACTS					
Noise pollution can disturb wildlife (disrupt mating calls and reduce production rates) and alter behaviour (abandon territories). Noise can be an interference to daily life of local residences. The site is located adjacent to the WWTW in the west, a pub and grill in the east and is traversed by two main roads. Industrial activities north of the site and an open area to the northeast. Noise levels must be kept to a minimum to prevent unnecessary disruptions. No blasting is expected to be required for the site.					

Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)
Phase	Construction
Aspect	Noise generated from construction activities
Nature of Impact	Direct – Noise impacts
Description of Impact	Construction noise can be an interference to daily life of local people in the project area
Impact Rating	

	Without mitigation		With mitigation	
Impact Significance	Negative Medium	15	Negative Low	10

No go alternative	Baseline conditions will remain the same – no noise impacts
GENERAL WASTE AND HAZARDOUS MATERIALS	
Investigations to reduce, reuse and recycle waste generated during the construction and operational phases are recommended.	
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)
Phase	Construction Phase and Operational Phase
Aspect	General waste
Nature of Impact	Direct
Description of Impact	Incorrect waste management can result in impact on natural terrestrial and aquatic systems and biodiversity
Impact Rating	

	Without mitigation		With mitigation	
Impact Significance	Negative Medium	15	Negative Low	9

Phase	Planning and Construction and operational Phase
Aspect	Hazardous materials
Nature of Impact	Direct
Description of Impact	Incorrect hazardous waste management can result in pollution of soil; runoff, aquatic systems, fauna and flora
Impact Rating	

	Without mitigation		With mitigation	
Impact Significance	Negative Medium	14	Negative Low	10

Phase	Planning, construction, and Operational Phase
Aspect	Waste management
Nature of Impact	Cumulative
Description of Impact	Increasing disposal at landfill and few recycling options - increasing development in the area will place more pressure on the landfill options available.
Impact Rating	

	Without mitigation		With mitigation (recycling / reuse options)	
Impact Significance	Negative Medium - High	16	Negative Medium	14

No go alternative	Baseline conditions will remain the same – no waste generation; site is currently vacant
SOCIAL IMPACTS	
The site is situated within the Mossel Bay Local Municipality, Garden Route District of the Western Cape Province. The National Development Plan, 2012 identifies ten critical actions for	

implementation; the following are identified as relevant to the proposed development:

- Social compact to reduce poverty and inequality, and raise employment (the site is considered to be an infill development)
- Interventions to ensure environmental sustainability and resilience to future shocks. (Relevant SDP and SWMP to incorporate recommendations in EMPR)
- New spatial norms and standards – densifying cities, improving transport, locating jobs where people live, upgrading informal settlements and fixing housing market gaps. (Industrial workshop are expected to create local employment opportunities in Groot Brak)

The Western Cape Government has identified priorities as its contributions to the realization of the aims and objectives of the National Development Plan (NDP) over the five-year term; the following are identified as relevant to the proposed development:

- Growth And Jobs
- Empowering People Education And Learning
- Mobility And Spatial Transformation (Industrial workshop are expected to create local employment opportunities in Groot Brak)

Ward-based planning was introduced under the third generation IDP for the MBM as a new dimension towards integrated planning and seeks to deepen public participation in Municipal matters. The population of Mossel Bay is 96 114 people in 2021 making it the second most populated municipal area in the Garden Route District. This is expected to grow to 97 514 by 2025, equating to an average annual growth rate of 0.4 per cent (Western Cape Provincial Treasury SEP, 2021). The annual income for households is divided into three categories, namely the proportion of people that fall within the low, middle- and high -income brackets. Poor households fall under the low-income bracket, which ranges from no income to R38 200 annually (R3 183 per month). Approximately 52,8% of households fall within the low-income bracket, of which 17.4% have no income. A sustained increase in economic growth is needed if the 2030 NDP income target of R110 000 per person, per annum is to be achieved (Stats SA, 2016). Industrial parks are identified in the IDP (2022 – 2027) as one of the LED priorities identified by council and executive mayor

Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)
Phase	Planning, Construction; Operational
Aspect	Construction Phase
Impact	Employment creation and skills development
Nature of Impact	Direct / Indirect
Description of Impact	The proposed development will contribute to the creation of direct employment opportunities and skills development through the creation of construction jobs for local contractors and labourers and suppliers of required services. Indirect employment could be created using various materials required for the construction phase. Permanent employment opportunities positions are likely to be created during operational phase through the workshop areas on site.
Impact Rating	

	Without mitigation		With mitigation	
Impact Significance	Positive Medium	14	Positive Medium	15

No go alternative	Baseline conditions will remain the same – no additional local economic opportunities
Phase	Construction Phase
Aspect	Criminal activities
Nature of Impact	Direct
Description of Impact	Risk of crime has negative social and / or economic consequences - The level of crime in South Africa does not only have a significant impact on the livelihood of citizens but also affects the general economy. Crime hampers economic growth by discouraging investment and capital accumulation. If not addressed decisively,

<table>
<tr><td></td><td>it leads to social and economic disparity. Poor lighting and alien vegetation on the property can lead to use of the site for criminals; measures must be put in place to ensure safety and security during construction and operational phases.</td></tr>
<tr><td>Impact Rating</td><td>
<table>
<tr><td></td><td>Without mitigation</td><td></td><td>With mitigation</td><td></td></tr>
<tr><td>Impact Significance</td><td>Negative Medium</td><td>11</td><td>Negative Low</td><td>9</td></tr>
</table>
</td></tr>
<tr><td>Phase</td><td>Operational phase</td></tr>
<tr><td>Aspect</td><td>Criminal activities</td></tr>
<tr><td>Nature of Impact</td><td>Direct</td></tr>
<tr><td>Description of Impact</td><td>Criminal activities during operations</td></tr>
<tr><td>Impact Rating</td><td>
<table>
<tr><td></td><td>Without mitigation</td><td></td><td>With mitigation</td><td></td></tr>
<tr><td>Impact Significance</td><td>Negative Medium</td><td>11</td><td>Negative Low</td><td>10</td></tr>
</table>
</td></tr>
<tr><td>No go alternative</td><td>Baseline conditions will remain the same</td></tr>
<tr><td colspan="2">TRAFFIC MANAGEMENT</td></tr>
<tr><td colspan="2">The site is intersected east-west by Sandhoogte Rd (DR1583) and intersected north-south by Sorgfontein Rd (DR1578); both roads are a low order (class 4) provincial divisional road. No official public transport routes are located close to the proposed development, although minibus taxis do utilize these roads on an unofficial basis. Access to portions 1&4 (eastern sections) of the development is proposed from Sandhoogte Rd at a point approximately 107m east of the intersection with Sorgfontein Rd. Access to portions 2 and 3 (western sections) of the development is proposed from Sandhoogte Rd, at a point approximately 117m west of the intersection with Sorgfontein Rd. Sight distances at both proposed access points are acceptable in both directions in both the horizontal and vertical alignments with the condition that the overgrown bush be trimmed for the complete road reserve width. The traffic impact statement of the proposed development evaluated the three intersections affected by the development. The results of the analysis indicate that the development has a negligible impact on the Level of Service during both the morning and afternoon horizon year 2030 peak hours and the intersection will continue to operate at a Level of Service A for both the morning and afternoon peak hours for all three intersections. he necessity of a right turn lane is not triggered in this analysis for any of the intersections or approaches.</td></tr>
<tr><td>Activity</td><td>Planning for construction and operation of the proposed warehouse storage and light industrial workshops</td></tr>
<tr><td>Layout</td><td>Proposed SDP 1 and 2 and revised SDP 3 (Appendix B) / TIA (Appendix H4)</td></tr>
<tr><td>Phase</td><td>Construction and operations</td></tr>
<tr><td>Aspect</td><td>Personnel vehicles, construction vehicles, deliveries / collections, machinery</td></tr>
<tr><td>Nature of Impact</td><td>Direct</td></tr>
<tr><td>Description of Impact</td><td>Impact on other road users</td></tr>
<tr><td>Impact Rating</td><td>
<table>
<tr><td></td><td>Without mitigation</td><td></td><td>With mitigation</td><td></td></tr>
<tr><td>Impact Significance</td><td>Negative Low</td><td>10</td><td>Negative Low</td><td>9</td></tr>
</table>
</td></tr>
<tr><td>No go alternative</td><td>Baseline conditions will remain the same – no additional traffic impact</td></tr>
<tr><td colspan="2">ELECTRICITY USE</td></tr>
<tr><td colspan="2">The bulk electrical supply will be supplied from the Mossel Bay Municipality’s (MBM) Midbrak 11/11kV Substation, via the existing 11kV underground cable. This cable is currently installed along the Sandhoogte Road, between the Grootbrak WWTW’s minisub and the Sandhoogte Booster Pump Station. The cable has a current-carrying capacity of 4.75 MVA (@11kV). Furthermore, it has been confirmed with the MBM’s Electrical Personnel that this feeder is currently very lightly loaded and does have spare capacity of at least 1 MVA available, which could be utilized for the planned development. The estimated diversified load of the total development, in line with the above design criteria, is estimated to be 613 kVA. For this reason, it</td></tr>
</table>

is recommended that 630kVA minisub be supplied for development. It is noted that energy saving, and green building design measures are proposed to be incorporated into this development. The final designs are recommended to be reviewed by an EAP / appointed ECO to confirm best practice energy saving measures are incorporated, with a view to keep night lighting to a minimal to reduce visual lighting impacts on the area.

Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops
Layout	Proposed SDP 1 and 2 and revised SDP 3 and bulk services (Appendix B)
Phase	Planning and Operational Phase
Aspect	Electric demand
Nature of Impact	Direct / cumulative
Description of Impact	Depleting non-renewable energy resources is a global problem. Energy capacity in South Africa has often failed to meet energy demands. The impact of the development on energy resources is low and the impact can be reduced by putting in relevant measures to reduce the demand on the National Grid.
Impact Rating	
No go alternative	Baseline conditions will remain the same – negligible impact on energy use; site is currently vacant

	Without mitigation		With mitigation (preferred design)	
Impact Significance	Negative Medium	16	Negative Medium	12

SEWAGE MANAGEMENT

The Average Dry Weather Flow (ADWF) created by the proposed development, in line with the above discussions, criteria and standards, is calculated at approximately 51kl/day. The design peak flow, inclusive of a specified peak factor of 3.5, as well as extraneous flow, will be calculated during the detail design stage. The Great Brak River WWTW has recently been upgraded and has sufficient capacity to accommodate this development. The internal sewer network for this development is divided into four drainage zones by Sandhoogte Road and Sorgfontein Road: The site has been divided into four drainage zone (A to D); a small section of zone A, designated zone A2, situated on the southern portion of zone A, cannot gravitate to the WWTW and storage units will be developed here with no sewer infrastructure. Sewer from the development will drain to the south-western boundary where it will connect into the main municipal sewer line flowing into the Great Brak River WWTW.

Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops
Layout	Proposed SDP 1 and 2 and revised SDP 3 and bulk services (Appendix B)
Phase	Construction and Operational Phase
Aspect	Sewage treatment and pipelines
Nature of Impact	Cumulative
Description of Impact	Cumulative impact on capacity of WWTW and supporting infrastructure. The developer can ensure strict control of what is disposed into the system from the site and ensure all infrastructure on the site is adequately installed and suitably maintained.
Impact Rating	
No go alternative	Baseline conditions will remain the same – negligible impact on WWTW as site is currently vacant with no sewage generation

	Without mitigation		With mitigation	
Impact Significance	Medium	11	Negative Low / negligible	7

WATER MANAGEMENT

The bulk water Average Annual Daily Demand (AADD) for this proposed development has been calculated at approximately 56kl/day. The bulk services report states that bulk water is available for this proposed development. It is recommended to incorporate rainwater tanks into the development due to the large roof area on the site. This can augment water supply required for industrial workshops and can also catch water during rainfall events assisting with alleviating the amount of stormwater generated by the site due to removal of vegetation on approximately 14 ha and replacing this area with hard surfaces.

Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 and bulk services (Appendix B)				
Phase	Planning, Construction, operations				
Aspect	Water use				
Nature of Impact	Direct / cumulative				
Description of Impact	Careful management of water use should result in a low to negligible impact on water availability				
Impact Rating		Without mitigation		With mitigation	
	Impact Significance	Negative Medium	13	Negative Low	9
No go alternative	Baseline conditions will remain the same – no impact – no sewage generation form the site.				
CHANGE IN LAND USE					
The site is currently vacant and was previously used for crop farming. The site has been vacant since 2014. The site is considered to be an infill development as development will take place on a site between existing developed portions and therefore bulk municipal services are already in place in close proximity to the site. Infill developments considered to be a positive economic benefit to the local municipality due to additional rates and taxes being generated without the burden of additional capital outlay which is expected to strengthen the financial sustainability of the municipality in both the short- and longer term. The change In landuse from agricultural 1 (currently vacant and not used for agricultural activities) to mixed / light industrial is considered to have a positive socio-economic impact on the local area. The site is also a degraded site adjacent to WWTW and south of the industrial development and therefore a preferred site for the development. The northern mapped CBA is recommended to be kept out of the development footprint and the artificial pond retains for stormwater management form the road. The SWM ponds should be designed to accommodate 1:100 storm water events.					
Activity	Planning for construction and operation of the proposed warehouse storage and light industrial workshops				
Layout	Proposed SDP 1 and 2 and revised SDP 3 (Appendix B)				
Phase	Planning, Construction, operations				
Aspect	Change in land use of the site in question is considered to be an overall positive impact of low significance to the area.				
Nature of Impact	Direct / indirect				
Description of Impact	Change in land use of the site in question is considered to be an overall positive impact of low significance to the area.				
Impact Rating	Impact Significance	Positive Low	10		
No go alternative	Baseline conditions will remain the same – positive impacts will not occur as result of the proposed development				

9. SUMMARY OF THE CONSEQUENCES OF/ IMPACTS OF THE UNLAWFULLY COMMENCED ACTIVITY/IES

Please provide a detailed summary of the consequences/impacts of commencement of the activity/ies on the environment.

Summary:
The commencement of clearing in 2020 by Ideal Trading prior to receipt of an EA for their proposed brick making facility has resulted in project delays for the new landowner and applicant, and related negative economic impacts. The environmental impacts associated with this clearing is overall considered to be a negative low impact due to the entire site used for crop farming (1963 to 2014) and this SW area used for two dwellings. The site was not representative of historical intact indigenous vegetation.
The proposed light industrial use of the property is considered to be a more suitable proposal than a brick making operation as it will use less energy and is an overall softer development proposal and considered to be in line with surrounding existing and proposed land uses.

10. OTHER MANAGEMENT, MITIGATION AND MONITORING MEASURES

(a) Over and above the mitigation measures described above, please indicate any additional management, mitigation and monitoring measures.

The NW CBA is recommended to be avoided, and the stormwater management ponds are recommended to be sized for the 1:100 storm events and the western road suitably equipped to allow drainage to the SW pond
Solar panels are recommended to be incorporated into energy requirements
Water tanks are recommended to be incorporated into light industrial water requirements
A row of storage containers is recommended between NW CBA and the light industrial workshops
Permeable pavers are recommended to be incorporated where possible
An AIS management plan is recommended to be in place for duration of construction and operations and relevant AIS clearing fee worked into rental fees of storage units / workshops. Example R10 per month / facility (approximate 220 facilities, provide R26000 per year towards AIS management)

Monthly audits are recommended during construction phase
Annual audit recommended during operations

(b) Describe the ability of the applicant to implement the management, mitigation and monitoring measures.

The EMPr is considered to be practical and auditable and allows for measures to be in place to prevent significant environmental impacts

Please note: A draft **ENVIRONMENTAL MANAGEMENT PROGRAMME** must be attached to this application as **Appendix I**.

SECTION G: ASSESSMENT METHODOLOGIES AND CRITERIA, GAPS IN KNOWLEDGE, UNDERLYING ASSUMPTIONS AND UNCERTAINTIES

(a) Please describe adequacy of the assessment methods used.

Reviewed information, specialist investigations, site visits and relevant guidelines and related research inform ratings.
Rating are assigned qualitative and quantitative value.
Refer to G1 IMPACT IDENTIFICATION AND ASSESSMENT METHODOLOGY

(b) Please describe the assessment criteria used.

Reviewed information, specialist investigations, site visits and relevant guidelines and related research inform ratings.
Rating are assigned qualitative and quantitative value.
REFER TO G1 IMPACT IDENTIFICATION AND ASSESSMENT METHODOLOGY

The methodology as for identification and rating of impacts is provided below

G1 IMPACT IDENTIFICATION AND ASSESSMENT METHODOLOGY

The purpose of impact assessment is to assign a qualified significance to impacts which are predicted to occur because of the various aspects of an activity.

The following definitions apply:

- Activity: A distinct process or task undertaken by an organisation for which a responsibility can be assigned. Activities also include facilities or pieces of infrastructure that are possessed by an organisation.
- Environmental aspect: An element of an organization's activities, products and services which can interact with the environment. The interaction of an aspect with the environment may result in an impact.
- Environmental impacts: The consequences of these aspects on environmental resources or receptors of value or sensitivity, for example, disturbance due to noise and health effects due to poorer air quality.
- Receptors: Comprise, but are not limited to, people or human-made systems, such as residents, communities and social infrastructure, as well as components of the biophysical environment such as aquifers, flora and paleontology.

Aspects

Aspects associated with the proposed project are differentiated into construction and operation phases of the project. The nature of the impact is described. Once this has been undertaken the significance of the impact is determined.

Identifying significant environmental impacts

The significant environmental impacts are identified using three sources of information:

- The nature of the receiving environment (the environment includes the social, cultural and biophysical environment)
- A review and understanding of the aspects associated with the proposed project.
- All comments received from interested and affected parties during the public participation process. The issues raised will be described considering the associated activity and the aspect of that activity that is likely to result in an impact.

Nature of the impact

Impacts on the environment can lead to changes in existing conditions; the nature of the impact can be direct, indirect or cumulative.

- Direct impacts refer to changes in environmental components that result from direct cause-effect consequences of interactions between the environment and project activities. The direct impact is caused by the action and occurs at the same time and place.
- Indirect (Secondary) impacts result from cause-effect consequences of interactions between the environment and direct impacts. The indirect impact is caused by the action and occurs later in time or is further removed in distance.
- Cumulative impacts refer to the combined effect of changes to the environment caused by multiple human activities over space and time. Cumulative impact is the sum of existing conditions and the direct / indirect impacts resulting from the project. Example: A single cut in the forest is unlikely to have a detectable change, however increasing multiple cuts in the forest caused by several human activities is likely to decrease fauna and flora and increase soil

erosion. Cumulative effects can thus be additive or synergistic. A synergistic effect refers to when the combined effect is greater than the sum of individual effects.

Method for assessing the overall significance of impacts

The overall significance of the impact is critical for defining mitigation and monitoring strategies. The qualified significance of predicted impacts assists to determine the way aspects should be managed to avoid or minimize the predicted impacts.

Overall significance of the impacts is determined through systematically rating the following criteria of the impacts:

- The status of the impact
- The spatial extent of the impact
- The severity of negativity or degree of positivity of the impact
  - The duration of the impact
  - The frequency of the impact
  - The intensity of the impact
- The consequence of the impact
- The probability of the impact occurring

Impact Status

A qualitative rating of positive or negative is assigned to impact status. Refer to Table 4 (methodology).

Spatial Extent

The spatial extent for each aspect, receptor and impact is defined. The geographical coverage (spatial extent) description will take account of the following factors:

- The physical extent / distribution of the aspect
- The physical extent / distribution of the receptor
- The proposed impact because of the aspect
- The nature of the baseline environment within the area of impact

For example, the impacts of noise are likely to be confined to a smaller geographical area than the impacts of atmospheric emissions, which may be experienced at some distance. The significance of impacts also varies spatially; noise may be significant in the immediate vicinity. A qualitative description is assigned to the rating. A quantitative value ranging from 1 – 6 is assigned to the rating. Refer to Table 4 (methodology).

Duration

The duration refers to the length of time that an aspect of a proposed project may cause change on the receiving environment. The receiving environment could refer to either the social or cultural or biophysical environment. The change caused may be a positive or negative change. A qualitative description is assigned to the rating. A quantitative value ranging from 1 – 6 is assigned to the rating.

Frequency

The frequency of the impact occurring refers to how often the aspect results in each impact on the receiving environment. The receiving environment could refer to either the social or cultural or biophysical environment. The impact may be positive or negative. A qualitative description is assigned to the rating. A quantitative value ranging from 1 – 6 is assigned to the rating.

Intensity

The intensity refers to the magnitude of the impact experienced by the receiving environment. The environment could refer to either the social or cultural or biophysical environment. The impact experienced may be a positive or negative impact. A qualitative description is assigned to the rating. A quantitative value ranging from 1 – 6 is assigned to the rating.

Severity / Degree

The severity is the sum of the intensity, duration and frequency of the impact and therefore a quantitative value ranging from 3 – 18 is assigned to the rating. If the impact is positive, the degree of positivity is determined. A qualitative description is assigned to the rating.

Consequence

A qualitative description is assigned to the rating. The consequence is the sum of the Severity (Intensity + Duration + Frequency) and Spatial Extent. Therefore, a quantitative value ranging from 4 – 24 is assigned to the rating.

Probability

To determine the significance of the impact, the probability of the impact occurring must first be rated. The probability refers to the likelihood that an impact will result from the aspect in question. A qualitative description is assigned to the rating. A quantitative value ranging from 1 – 6 is assigned to the rating.

Overall Significance

A definition of a "significant impact" for the purposes of the study is: "An impact which, either in isolation or in combination with others, could, in the opinion of the specialist, have a material influence on the decision-making process, including the specification of mitigating measures."

A qualitative description is assigned to the rating. The significance is the sum of the Consequence and Probability. Therefore, a quantitative value ranging from 5 - 30 is assigned to the rating. A value of 5, 6 or 7 represents a low significance and described as "not harmful". A value of 30 presents a Very High Significance and is described as an "environmental disaster".

Mitigation

The Mitigation ratings are described qualitatively according to the success and feasibility of the mitigation option in question. The impacts are further rated before and after mitigation / management options. Negative impacts are assessed with mitigation measures in place to give an overall significance rating with mitigation in place. Positive impacts are assessed with management measures in place to give an overall significance rating with management in place.

Confidence

The confidence of the EAP is assigned a qualitative value.

Table 4: Impact Assessment Rating methodology

Impact Status						
Rating	**Negative**			**Positive**		
Description	An impact is rated negative if any degree of negative change will occur in the receiving environment because of any aspect of the proposed project. The environment refers to the social environment or the cultural environment or the biophysical environment. Negative impacts are to be avoided, minimised, or mitigated.			An impact is rated positive if any degree of positive change will occur in the receiving environment because of any aspect of the proposed project. The environment refers to the social environment or the cultural environment or the biophysical environment. Positive impacts are to be enhanced.		
Scale (Spatial Extent) Refers to the spatial area the aspect will impact on the environment. The impact may be positive or negative.						
Rating	**Activity specific**	**Site specific**	**Local area Specific**	**Municipal**	**Provincial / National**	**International**
Description	Impact only experienced on area where activity is located	Impact extends to the entire site of the project	Impact extends beyond site into surrounding areas	Impact extends beyond local area into municipal areas	Impact extends beyond municipal area into provincial and may extend nationally	Impact extends beyond national area
Value	1	2	3	4	5	6
Duration Refers to the length of time that the aspect may cause a change on the environment. The change may be positive or negative.						
Rating	**Very Short term**	**Short term**	**Short - Medium term**	**Medium term**	**Medium - Long term**	**Long term**
Description	1 day to 3 months	3 months to one year	One year to three years	Three years to ten years	Life of operation	Extends beyond post closure
Value	1	2	3	4	5	6
Frequency Refers to how often the aspect may impact on the environment. The impact may be positive or negative.						

Rating	Rarely	Infrequent	Seldom	Regular	Often	Continuously
Description	Could occur annually	Could occur within 6 months	Monthly	Weekly	Daily	Nonstop
Value	1	2	3	4	5	6
Intensity (Magnitude / Size) Refers to the intensity of the impact experienced by the receiving environment. The impact may be positive or negative.						
Rating	**Low**	**Low to medium**	**Medium**	**Medium to High**	**High**	**Very High**
Description	Low intensity experienced only by receiving environment and / or occurs within 100 metres of activity	Low – medium intensity on receiving environment and / or occurs 100 – 500 metres of activity	Medium intensity on receiving environment and / or occurs 500 – 1000 metres of activity	Medium to high intensity on receiving environment and / or occurs within 1000 – 5000 metres of activity	High intensity on receiving environment and / or occurs within 5000 – 10 000 metres of activity	Very high intensity on receiving environment and / or within 10 000 metres or beyond of the activity
Value	1	2	3	4	5	6
Severity of negative impact Severity (Intensity + Duration + Frequency) The severity of an environmental aspect is determined by the degree of change to the baseline environment, and considers the following: The reversibility of the negative impact, The sensitivity of the receptor to the stressor, The impact duration, its permanency and whether it increases or decreases with time.						
Rating	**Negligible**	**Low Negative**	**Medium Negative**	**Medium - High Negative**	**High Negative**	**Very High Negative**
Description	There will be negligible impact because of the aspect	There will be a minor impact because of the aspect. This is easily reversible.	The aspect will result in a moderate impact. Reversibility of the impact easy but costly.	The aspect will result in a high impact. Reversibility of the impact possible but costly.	The aspect will result in a high impact. Reversibility of the impact difficult and costly.	The aspect will result in a severe impact. Reversibility of the impact not likely.
Value	3	4-6	7-9	10-12	13-15	16-18
Degree of positive impact Degree (Intensity + Duration + Frequency) The severity of an environmental aspect is determined by the degree of change to the baseline environment, and considers the following: The enhancement of the positive impact, The sensitivity of the receptor to the opportunity, The impact duration, its permanency and whether it increases or decreases with time.						
Rating	**Negligible**	**Low Positive**	**Medium Positive**	**Medium High Positive**	**High Positive**	**Very High Positive**
Description	There will be negligible impact because of the aspect	There will be a minor impact because of the aspect.	The aspect will result in a moderate impact.	The aspect will result in a high impact.	The aspect will result in a high impact.	The aspect will result in an extremely high positive impact.
Value	3	4-6	7-9	10-12	13-15	16-18
Negative Consequence Consequence = (Severity + Spatial extent)						
Rating	**Negligible**	**Negative low**	**Negative Medium**	**Negative Medium High**	**Negative High**	**Negative Very High**
Description	Impact has insignificant consequence on receiving environment. Requires little or no mitigation.	Impact requires in situ mitigation and receptor mitigation.	Impact requires in situ mitigation and receptor mitigation	Impact requires in situ mitigation, receptor mitigation and repair or restoration.	Impact requires in situ mitigation, receptor mitigation and repair or restoration and possible compensation.	Impact is to be avoided
Value	4	5-8	9-12	13-16	17-20	20-24
Positive Consequence Consequence = (Degree + Spatial extent)						
Rating	**Negligible**	**Positive low**	**Positive Medium**	**Positive Medium High**	**Positive High**	**Positive Very High**
Description	Impact has insignificant consequence on	Impact has a positive consequence;	Impact has a positive consequence;	Impact has a positive consequence;	Impact has a positive consequence;	Widespread / substantial beneficial effect.

	receiving environment.	management required to enhance positive outcomes.	management required to enhance positive outcomes.	management required to enhance positive outcomes.	management required to maintain positive outcomes.	No alternative ways to achieve same benefits. Management required to maintain positive outcomes.
Value	4	5-8	9-12	13-16	17-20	20-24
Probability Refers to the likelihood that an impact will result from the aspect in question. The impact may be positive or negative.						
Rating	**Slim**	**Slight**	**Plausible**	**Probable**	**Expected**	**Anticipated**
Description	0 - 9% likelihood	10 – 25 % likelihood	26 - 50% likelihood	51 - 75% likelihood	76 - 90% likelihood	91 - 100 % likelihood
Value	1	2	3	4	5	6
Negative Significance (Consequence + Probability)						
Rating	**Negligible**	**Low**	**Medium**	**Medium High**	**High**	**Very High**
Description	Not harmful	Slightly harmful	Harmful	Very Harmful	Considerably Harmful	Disaster
Value	5	6-10	11-15	16-20	21-25	26-30
Positive Significance (Consequence + Probability)						
Rating	**Negligible**	**Low**	**Medium**	**Medium High**	**High**	**Very High**
Description	Insignificant	Slightly positive	Positive	Positive but not substantial.	Substantial positive impact.	Necessity
Value	5	6-10	11-15	16-20	21-25	26-30
Mitigation of negative impact						
Rating	**None**	**Likely**	**Possible**	**Difficult**	**Unlikely**	**Not possible**
Description	Mitigation not required. Impact remains the same.	Impact can be avoided with mitigation which has proven results.	Impact can be minimised and managed with mitigation	Difficult or costly to mitigate.	Difficult and costly to mitigate	Impact cannot be mitigated
Management of positive impact						
Rating	**None**	**Likely**	**Possible**	**Difficult**	**Unlikely**	**Not possible**
Description	Management not required. Impact remains the same.	Impact can be easily enhanced with management which has proven results.	Impact can be enhanced with management	Difficult or costly to enhance but possible	Difficult and costly to enhance	Impact cannot be enhanced
Confidence Refers to the confidence level the EAP has in predicting the impact.						
Rating	**Low**	**Medium low**	**Medium**	**Medium High**	**High**	**Very High**

(c) Please describe the gaps in knowledge.

Search and rescue of fauna and flora must be carried out prior to the start of construction.
Details of specific activities proposed in workshop has not been provided. Examples of activities provided includes light industrial activities including woodworking, areas for sales / repairs of cars / caravans. Activities are to be restricted as per the land use planning bylaw and no activities requiring an AEL or WML or WUL (with exception of S21 c and I GA) have been assessed and therefore will not be permitted. In additional , only the NEMA activities included in this application have been assessed and are requesting to be authorised. Other NEMA listed activities (not included in this form) will therefore not be permitted. Example of activities not permitted – filling station, crematorium.

(d) Please describe the underlying assumptions.

No light industrial activities requiring an AEL or WML or WUL (with exception of GA in terms of S21 c and I) to take place. No other NEMA listed activities (other than those included and applied for in this form) to take place.

(e) Please describe the uncertainties.

Detailed species assessments have not been carried out for the entire area and some species may have been overlooked; search and rescue of fauna and flora must be carried out prior to the start of construction (dam, enclosures)

SECTION H: RECOMMENDATIONS OF THE EAP

In my view (EAP), the information contained in the Application and the documentation attached hereto is sufficient to make a decision in respect of the activity applied for.	**YES**	NO

If "NO", list the aspects that should be further assessed through additional specialist input/assessment:		
If "YES", please indicate below whether in your opinion the applicant should be directed to cease the activity or if it should be authorised:		
Applicant should be directed to cease the activity:	YES	**NO**
Please provide reasons for your opinion		
It is the opinion of the EAP that previous clearing should not have taken place prior to the assessment and required environmental authorisation in place. The retrospective assessment for this clearing found that the site had been previously disturbed and not representative of CBA features. The assessment of the proposed activity shows that positive social and economic benefits can be expected, and with the EMPr successfully implemented, the direct impacts are of negative low impact significance. All recommendations included in the EMPr (Appendix I) are to be implemented.		

SECTION I: REPRESENTATIONS – RESPONSE TO AN INCIDENT OR EMERGENCY SITUATION

This section is only applicable to instances where Section 49A (2) of NEMA applies. Please list all steps that where taken in response to the incident or emergency situation.

Please note:

Section 30 of NEMA deals with the procedures to be followed for the control of emergency incidents and Section 30A deals with procedures to the followed in the case of emergency situations.

SECTION J:PUBLIC PARTICIPATION

1. PUBLIC PARTICIPATION PROCESS TO BE FOLLOWED

1.1 THE PUBLIC PARTICIPATION PROCESS IN TERMS OF THE SECTION 24G FINE REGULATIONS, 2017

Regulation 8 of the Section 24G Fine Regulations require that all applicants must conduct public participation **prior to submission** of a section 24G application (as outlined in Annexure A of the Section 24G Fine Regulations - Section D: Preliminary Advertisement).

"The applicant must place a preliminary advertisement in-
(1) A local newspaper in circulation in the area in which the activity was, or activities were, commenced; and on the applicant's website, if any.
(2) This advertisement must comply with the requirements set out in Annexure A, Section D of the Section 24G Fine Regulations, 2017.
(3) The applicant must open and maintain of a register of interested and affected parties.

*(4) The **register must be attached to the application form and included in the report**, or form part of the information submitted in terms of section 24G(1) of the Act, which the register must, as a minimum, contain the names, contact details and addresses of-*

(a) all persons who, as a consequence of the public participation process conducted in respect of the application, have submitted written comments or attended meetings with the applicant or any environmental assessment practitioner or other specialist appointed by the applicant to assist with the application;

(b) all persons who have requested the applicant, in writing, to place their names on the register; and

(c) all organs of state that have jurisdiction in respect of the activity to which application relates."

Please provide a summary of the steps followed where public participation was undertaken in accordance with Regulation 8 prior to submission of this Application Form. Ensure that proof of compliance with Regulation 8 is submitted with this Application Form, including, *inter alia*, proof of preliminary advertisement in a local newspaper.

A public participation process is being carried out in accordance with Section 24J of the NEMA; the following activities have been carried out:

- Notice of proposed application for EA and registration of IAPs:
  - Placing two posters close to the site to inform the public of the process.
  - Emailing notice to organs of state, landowners and potential IAPs of the intended S24G application
  - Placing an advertisement in the Mossel Bay Advertiser on 6 September 2024
- Allowing for a 30-day registration and initial comment period on Notice and BAR
- Registration of IAPs: : 6 September to 7 October 2024
- Record of registration and initial comments received in response to the notices

The draft section 24G application form report will be distributed to registered IAPs for a 30-day review and comment period.

All comments received as well as responses provided by the Environmental Impact Assessment Practitioner and the proponent will be recorded throughout the process. Comments will be addressed in the assessment process. Thereafter the Final S24G application will be submitted to the competent authority for decision making.

Refer to appendix G

Please indicate whether the applicant has a website (please tick relevant box):	**YES**	NO

If yes, please note that the application information as specified above must have been advertised on such website and proof thereof must accompany this application.

The draft S24G application and appendices will be available on the website for 30 day comment and review

Please note: Annexure A: Section D attached to this Application form must be strictly adhered to.

1.2 THE PUBLIC PARTICIPATION PROCESS IN TERMS OF NEMA EIA REGULATIONS, 2014

As the applicant, you may be directed to conduct the public participation process that fulfils the requirements outlined in Chapter 6 of the EIA Regulations, 2014. In doing so, you must take into account any applicable guidelines published in terms of Section 24J of NEMA, the Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations, 2014 as well as any other guidance provided by the Department. Note that the public participation requirements are applicable to all proposed sites.

Please highlight the appropriate box below to indicate the public participation process that has been or will be undertaken to give notice of the application to all potential interested and affected parties, including deviations that may be agreed to by the competent authority:

1. In terms of regulation 41 of the EIA Regulations, 2014 -		
(a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of -		
(i) the site where the activity to which the application relates is or is to be undertaken; and	**YES**	DEVIATION
(ii) any alternative site	YES	DEVIATION

(b) giving written notice, in any manner provided for in section 47D of the NEMA, to –			
(i) the occupiers of the site and, if the applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	**YES**	DEVIATION	N/A
(ii) owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	**YES**	DEVIATION	
(iii) the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;	**YES**	DEVIATION	
(iv) the municipality (Local and District Municipality) which has jurisdiction in the area;	**YES**	DEVIATION	
(v) any organ of state having jurisdiction in respect of any aspect of the activity; and	**YES**	DEVIATION	
(vi) any other party as required by the Department;	**YES**	DEVIATION	N/A
(c) placing an advertisement in -			
(i) one local newspaper; or	**YES**	DEVIATION	
(ii) any official *Gazette* that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;	YES	DEVIATION	**N/A**
(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken	YES	DEVIATION	**N/A**
(e) using reasonable alternative methods, as agreed to by the Department, in those instances where a person is desirous of but unable to participate in the process due to— (i) illiteracy; (ii) disability; or (iii) any other disadvantage.	YES	DEVIATION	**N/A**
If you have indicated that "DEVIATION" applies to any of the above, then Section 2. below must be completed.			
NOTE: 2. The NEM: WA requires that a notice must be placed in at least two newspapers.			
If applicable, have/will an advertisement be placed in at least two newspapers?	YES	NO	
If "NO", then an application for exemption from the requirement must be applied for.			

1. **Provide a list of all the state departments that has been / will be consulted:**		
List of State Depts.	**Comment obtained (YES/NO**	**If not, provide reasons**
Note: State department have been notified of intent to submit application and will be sent draft 24G application for 30-day comment and review period; the draft application will then be updated and sent to the CA for consideration		
Department of Environmental Affairs and Development Planning (DEA & DP)		Application to be sent for 30-day comment and review period
Department of Environmental Affairs and Development Planning: Environmental Law Enforcement		Application to be sent for 30-day comment and review period
Department of Environmental Affairs & Development Planning: Head of Component: Biodiversity		Application to be sent for 30-day comment and review period
Department of Health		Application to be sent for 30-day comment and review period
Heritage Western Cape		Application to be sent for 30-day comment and review period
Transport & Public Works / Department of Infrastructure		Application to be sent for 30-day comment and review period
Department of Water & Sanitation / Breede-Gouritz Catchment Management Agency	Yes – included in Appendix G	Application to be sent for 30-day comment and review period

Western Cape Department of Agriculture		Application to be sent for 30-day comment and review period
DFFE: Forestry Management		Application to be sent for 30-day comment and review period
Cape Nature Land Use Advice		Application to be sent for 30-day comment and review period
Southern Cape Fire Protection Agency		Application to be sent for 30-day comment and review period
SANPARKS		Application to be sent for 30-day comment and review period
Mossel Bay Municipality – Ward 4 Councillor		Application to be sent for 30-day comment and review period
Mossel Bay Municipality		Application to be sent for 30-day comment and review period
Garden Route District Municipality		Application to be sent for 30-day comment and review period

2. **Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues raised were incorporated, or the reasons for not being incorporated or addressed.** **(The details of the outcomes of this process, including supporting information must be included in the Comments and Report to be attached to this application as Appendix G.)**
Interested and affected parties have requested the reports for review. All IAPs will be sent the draft application and supporting appendices to all registered IAPs for a 30 day review and comment period. The S24G application form and supporting appendices will be updated. PP and CRR provided in Appendix G.

3. **Provide a summary of any conditional aspects identified / highlighted by any Organs of State, which have jurisdiction in respect of any aspect of the relevant activity.**
All IAPs (including organs of state) will be sent the draft application and supporting appendices to all registered IAPs for a 30 day review and comment period. The S24G application form and supporting appendices will be updated. Information provided to date is included in appendix G (PP and CRR) and Appendix J (documents reviewed by EAP)

Please note:

- **A list of all the potential interested and affected parties, including the organs of State must be opened, maintained and made available to any person requesting access, in writing, to the register.**
- **All comments of interested and affected parties on the Application Form and Additional Information must be recorded, responded to and included in the Comments and Responses Report attached as Appendix G to the Application. The Comments and Responses Report must also include a description of the Public Participation Process followed.**
- **The minutes of any meetings held by the EAP with interested and affected parties and other role players which record the views of the participants must also be submitted as part of the public participation information to be attached to the additional information/Environmental Impact Report as Appendix G.**
- **<u>Proof</u> of all the notices given as indicated, as well as of notice to the interested and affected parties of the availability of the Application Form/Additional Information must be submitted as part of the public participation information to be attached to the application as Appendix G.**

2. REPRESENTATIONS REGARDING DEVIATION FROM PUBLIC PARTICIPATION REQUIREMENTS IN TERMS OF THE EIA REGULATIONS, 2014

Please provide detailed reasons (representations) as to why it would be appropriate not direct you to comply with all of the

requirements and to deviate from the requirements of regulation 41 as indicated above.

3. LIST OF STATE DEPARTMENTS

Section 24(O)(2) obliges the relevant authority to consult with every State department that administers a law relating to a matter affecting the environment when such authority considers an application for an environmental authorisation.

Provide a list of all the State departments that will be/have been consulted, including the name and contact details of the relevant official.

LIST OF INTERESTED AND AFFECTED PARTIES, May 2025

STATE DEPARTMENTS			
Name	**Contact Person**	**Contact Details**	**Email**
Department of Environmental Affairs and Development Planning (DEA & DP)	Danie Swanepoel Francois Naude Meryll Fredericks	Private Bag x6509, George, 6530 044 814 2013 (T)	Danie.Swanepoel@westerncape.gov.za Francois.Naude@westerncape.gov.za Meryll.Fredericks@westerncape.gov.za
Department of Environmental Affairs and Development Planning: Environmental Law Enforcement	**Harriet van Schalkwyk** Zaidah Toefy Shafeeq Mallick	1st Floor, Leeusig Building, 1 Dorp Street, Cape Town, 8000 Tel: +27 (0)21 483 2701 Department of Environmental Affairs and Development Planning Western Cape Government 1st Floor, Leeusig Building, 1 Dorp Street, Cape Town, 8000 Tel: +27 (0)21 483 2701	Harriet.vanSchalkwyk@westerncape.gov Zaidah.Toefy@westerncape.gov.za jck.kotze@gmail.com ***Shafeeq.Mallick@westerncape.gov.za*** Diana.Mouton@westerncape.gov.za Nicholas.Kearns@westerncape.gov.za Nabeelah.Khan@westerncape.gov.za siphesihle.khumalo@westerncape.gov.za
Department of Health	Nathan J1acobs	Private Bag x6592, George, 6530 044-803 2727 (T) 044-873 5929 (F)	Nathan.Jacobs@westerncape.gov.za
Heritage Western Cape	Noluvo Toto Stephanie Barnardt	Private Bag x9067, Cape Town, 8000 021-483 9729 (T) 021-483 9845 (F)	Noluvo.Toto@westerncape.gov.za Stephanie.barnardt@westerncape.gov.za
Transport & Public Works / Department of Infrastructure	Vanessa Stoffels	24th Floor, 9 Lower Burg Street, Cape Town 021 483 4669 (T)	Vanessa.Stoffels@westerncape.gov.za
DFFE: Forestry Management	Melanie Koen	Private Bag x12, Knysna, 6570 044 302 6902 (T) 044 382 5461 (F)	MKoen@dffe.gov.za
Department of Environmental Affairs & Development Planning: Head of Component: Biodiversity	**Project Manager: Albert Ackhurst**	021 483 8364	Albert.Ackhurst@westerncape.gov.za

Department of Water & Sanitation	John Roberts	Private Bag x16, Sanlamhof, 7532 021 941 6179 (T) 021 941 6082 (F)	RobertsJ@dws.gov.za
Rudzani Makahane (Mr) Water Use Specialist: Breede-Olifants CMA	Rudzani Makahane (Mr)	Tel: 023 346 8000 | Cell: 079 2141 396 Address: 101 York Street, Room 302, George	rmakahane@bocma.co.za rmphahlele@bocma.co.za asam@bocma.co.za
	Rabokale Mphahlele	Tel: 023 346 8000 | Cell: 079 2141 396	
	Andiswa Sam	Address: 101 York Street, Room 302, George	
Western Cape Department of Agriculture	Cor van der Walt	021 808 5099	Cor.vanderWalt@westerncape.gov.za Brandon.Layman@westerncape.gov.za Landuse.elsenburg@elsenburg.com
National Department of Agriculture, Forestry and Fisheries Land Use and Soil Management	Lutendo Netshilema Directorate Land Use and Soil Management	021 994 1413 Private Bag X2 Sanlamhof 7532	phumezasi@dalrrd.gov.za lutendon@dalrrd.gov.za
ORGANS OF STATE			
Name	**Contact Person**	**Contact Details**	**Email**
Cape Nature Land Use Advice	Megan Simons Keith Spencer	Private Bag x6546, George, 6530 044 802 5328 (T) 044 802 5313 (F)	msimons@capenature.co.za kspencer@capenature.co.za
Southern Cape Fire Protection Agency	Dirk Smit	Private Bag x12, Knysna, 6570 044 302 6912 (T) 086 616 1682 (F)	managerfpa@gmail.com
SANPARKS	Vanessa Weyer	PO Box 3542, Knysna, 6570 044 302 5600 (T) 044 382 4539 (F)	Vanessa.Weyer@sanparks.org
Mossel Bay Municipality (Applicant)			
Name	**Contact Person**	**Contact Details**	**Email**
Mossel Bay Municipality	**Carel Venter** Director Planning & Economic Development	044 606 5000 (T) 044 606 5062 (F) Postal: Private Bag X29, Mossel Bay, 6500 Physical: 101 Marsh Street, Mossel Bay	cventer@mosselbay.gov.za
Mossel Bay Municipality	**Dick Naidoo** Director Infrastructure Services	044 606 5000 (T) 044 606 5062 (F) Postal: Private Bag X29, Mossel Bay, 6500 Physical: 101 Marsh Street, Mossel Bay	dnaidoo@mosselbay.gov.za
Mossel Bay Municipality	**Colin Puren** Municipal Manager	044 606 5000 (T) 0446065062 (F) Postal: Private Bag X29, Mossel Bay, 6500 Physical: 101 Marsh Street, Mossel Bay	mmoffice@mosselbay.gov.za

Mossel Bay Municipality	**Rushanah Carelse**	044 606 5000 (T) 0446065062 (F) Postal: Private Bag X29, Mossel Bay, 6500 Physical: 101 Marsh Street, Mossel Bay	rcarelse@mosselbay.gov.za
Mossel Bay Municipality – Ward 4 Councillor	Anna Janse van Rensburg	082 871 0927	anna.jansevanrensburg@mosselbay.gov.za
Garden Route District Municipality	Mr. Lusanda Menze	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	info@gardenroute.gov.za
Garden Route District Municipality	Dr. Nina Viljoen	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	nina@gardenroute.gov.za
Mossel Bay Municipality – Ward 4	Clr Annatjie Janse van Rensburg (DA)	082 871 0927	anna.jansevanrensburg@mosselbay.gov.za
Mossel Bay Municipality	Minnie, Rudi <rminnie@mosselbay.gov.za>	Please include the following emails on the IAP's mailing list:	admin@mosselbay.gov.za rminnie@mosselbay.gov.za stentu@mosselbay.gov.za
Garden Route District Municipality	Mr. Lusanda Menze	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	info@gardenroute.gov.za
Garden Route District Municipality	Dr. Nina Viljoen	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	nina@gardenroute.gov.za
Landowners			
Farm / Erf No.	**Contact Person**	**Postal/ Physical Address**	**Email**
Sapphire Ocean Investments (RF) (Pty) Ltd	Mr Erno Janse van Rensburg	Krugerlaan Plot 14 Lyttelton, Centurion	Ernoj@alsgroup.co.za
Previous landowner – site clearing			
Ideal Trading 301 CC,	Mr C.Spies & D. Swanich,	Groot Brak River, 6503	christo@cobrafuel.co.za dicky@cobratransport.co.za
Surrounding Landowners			
Farm / Erf No.	**Contact Person**	**Postal/ Physical Address**	**Email address**
RE/53/129 (east)	Oasis Pub and Grill	Zandhoogte	
RE/25/129 (east)	Landowner / Occupier Rheeboksfontein Plase Pty Ltd	RE/25/129, Great Brak River, Rheeboksfontein Plase Pty Ltd; PO Box 2, Little Brak River, 6503	
Ptn 1/139 (north)	HC & PR Steyn Pty Ltd	139/1, Great Brak River, HC & PR Steyn Pty Ltd, PO Box 242, Mossel Bay, 6500	
23/129 WOLVEDAN (West)	23/129 is owned by the MB Municipality	MBM JESSICA GOSSMAN / BETSY DITCHAM SES environmental Services – EAP for proposed PV Solar plant and Battery energy storage systems	
40/129 Wolvedans (WWTW) (west)	Mossel Bay Municipality / Groot Brak	Zandhoogte	
11/ 142 RHEEBOKSFONTEIN (north)	Rheebok Brick Operations (Pty) Ltd 0446202276	Rheebok Brick Operations	

N2 (south)	Road - Transport & Public Works / Department of Infrastructure	N2	
RE/5/139 (South)	Droombos – Garden Route	R102	
WOLVEDANS 115 / 129 (SW)	Droombos garden Route	R102	
114/129		Not directly adjacent	
Erf 998 Tegniet / Remainder of Portion 5 of the Farm Zandhoogte 139.	3MP Sales and Education Services CC Registration number 1996/051600/23. Town planning motivational report – Jan Vroulik town Planners	South of N2 / west of Sorgfontein road – land use change application – relevant	
Registered IAPs			
Marie de la Rey			
Val Thomson			
Scott Thomson			
Johan Snyman			

Please note:

A State department consulted in terms of Section 24O(2) of NEMA and Regulations 3(4) and 43(2) must within 30 days from the date of the Department/EAP's request for comment, submit such comment in writing to the Department. The applicant/EAP is therefore required to inform this Department in writing when the application/relevant information is submitted to the relevant State Departments. Upon receipt of this confirmation, this Department will in accordance with Section 24O (2) & (3) of the NEMA inform the relevant State Departments of the commencement date of the 30-day commenting period.

Western Cape Government
Environmental Affairs and Development Planning

BETTER TOGETHER.

PART 2 – ANNEXURE A TO THE SECTION 24G APPLICATION FORM

SECTION A: DIRECTIVES

Section 24G(1) of NEMA provides that on application by a person who has commenced with a listed or specified activity without an environmental authorisation in contravention of section 24F(1); or a person who has commenced, undertaken or conducted a waste management activity without a waste management licence in terms of section 20(b) of the National Environment Management: Waste Act, 2008 (Act 59 of 2008) ("NEM:WA") the Minister, the Minister responsible for mineral resources or the MEC concerned (or the official to which this power has been delegated), as the case may be, may direct the applicant to-

i	*immediately cease the activity pending a decision on the application submitted in terms of this subsection*	
ii	*investigate, evaluate and assess the impact of the activity on the environment*	
iii	*remedy any adverse effects of the activity on the environment*	
iv	*cease, modify or control any act, activity, process or omission causing pollution or environmental degradation*	
v	*contain or prevent the movement of pollution or degradation of the environment*	
vi	*eliminate any source of pollution or degradation*	
vii	*compile a report containing-*	
	aa	*a description of the need and desirability of the activity*
	bb	*an assessment of the nature, extent, duration and significance of the consequences for or impacts on the environment of the activity, including the cumulative effects and the manner in which the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity*
	cc	*a description of mitigation measures undertaken or to be undertaken in respect of the consequences for or impacts on the environment of the activity*
	dd	*a description of the public participation process followed during the course of compiling the report, including all comments received from interested and affected parties and an indication of how the issues raised have been addressed*
	ee	*an environmental management programme*
viii	*provide such other information or undertake such further studies as the Minister, Minister responsible for mineral resources or MEC, as the case may be, may deem necessary.*	

You are hereby provided with an opportunity to make representations on any or all of the abovementioned instructions including where you are of the opinion that any of these instructions are not relevant for the purposes of your application setting out the reasons for your assertion. Kindly note further that after taking your representation into account a final directive may be issued.

Please Note:

Notwithstanding the above, subsequent to submission of the application form to the Department, you may be issued with a specific directive in terms of section 24G(1)(i) to (viii), and you will therefore be provided with an opportunity to make further representations as to the specific directive.

The appointed Environmental Assessment Practitioner, on behalf of the applicant, may be directed to compile and submit a report that meets the requirements of section 24G(vii)(aa)-(ee) as specified above.

SECTION B: DEFERRAL OF THE APPLICATION

Section 24G(7) of the NEMA provides that if at any stage after the submission of an application it comes to the attention of the Minister, the Minister responsible for mineral resources or the MEC, that the applicant is under criminal investigation for the contravention of, or failure to comply with, section 24F(1) of the NEMA or section 20(b) of the NEM:WA, the Minister, Minister responsible for mineral resources or MEC may defer a decision to issue an environmental authorisation until such time as the investigation is concluded and-

(a) the National Prosecuting Authority has decided not to institute prosecution in respect of such contravention or failure;
(b) the applicant concerned is acquitted or found not guilty after prosecution in respect of which such contravention or failure has been instituted; or
(c) the applicant concerned has been convicted by a court of law of an offence in respect of such contravention or failure and the applicant has in respect of the conviction exhausted all the recognised legal proceedings pertaining to appeal or review.

Kindly answer the following questions:

Are you, the applicant, being investigated for a contravention of section 24F(1) of the NEMA in respect of a matter that is not subject to this application and in any province in the Republic?	*YES*	***NO***	*UNCERTAIN*
If yes provide details of the offence being investigated and authority conducting the investigation. *If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.*			
Are you, the applicant, being investigated for the contravention of section 20(b) of the NEMWA in respect of a matter that is not subject to this application and in any province in the Republic?	*YES*	***NO***	*UNCERTAIN*
If yes provide details of the offence being investigated and authority conducting the investigation. *If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.*			
Are you, the applicant, being investigated for an offence in terms of section 24F(1) of the NEMA or section 20(b) of the NEMWA in terms of which this application directly relates?	*YES*	***NO***	*UNCERTAIN*
If yes provide details of the offence being investigated and authority conducting the investigation. *If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.*			

If you have answered yes or uncertain to any of the above questions, you are hereby provided with an opportunity to make representations as to why the Minister, Minister responsible for mineral resources or MEC, as the case may be, should not defer the application as he or she is entitled to do under section 24G(7).

SECTION C: QUANTUM OF THE SECTION 24G FINE

In terms of section 24G(4) of the NEMA, it is mandatory for an applicant to pay an administrative fine as determined by the competent authority before the Minister, Minister responsible for mineral resource or MEC may take a decision on whether or not to grant an *ex post facto* environmental authorisation or a waste management licence as the case may be. The quantum of this fine may not exceed R5 million.

Having regard to the factors listed below, you are hereby afforded with an opportunity to make representations in respect of the quantum of the fine and as to why the competent authority should not issue a maximum fine of R5 million.

Please note that Part 1 of this section must be completed by an independent environmental assessment practitioner after conducting the necessary specialist studies, copies of which must be submitted with this completed application form.

Please also include in your representations whether or not the activities applied for in this application (if more than 1) are in your view interrelated and provide reasons therefor.

PART 1: THE IMPACTS OR POTENTIAL IMPACTS OF THE ACTIVITY/ACTIVITIES

Index	**Socio Economic Impact** **Description of variable**	**Place an "x" in the appropriate box**
	The activity is not giving, has not given and will not give rise to any negative socio-economic impacts	
	The activity is giving, has given, or could give rise to negative socio-economic impacts, but highly localised	
	The activity is giving, has given, or could give rise to significant negative socio-economic and regionalized impacts	
	The activity is resulting, has resulted or could result in wide-scale negative socio-economic impacts.	
	The proposed activity is expected to result in a positive impact for he municipality - The site is considered to be an infill development as development will take place on a site between existing developed portions and therefore bulk municipal services are already in place in close proximity to the site. Infill developments considered to be a positive economic benefit to the local municipality due to additional rates and taxes being generated without the burden of additional capital outlay which is expected to strengthen the financial sustainability of the municipality in both the short- and longer term.	

Index	**Biodiversity Impact** **Description of variable**	**Place an "x" in the appropriate box**
	The activity is not giving, has not given and will not give rise to any impacts on biodiversity	
	The activity is giving, has given or could give rise to localised biodiversity impacts	✓
	The activity is giving, has given or could give rise to significant biodiversity impacts	
	The activity is, has or is likely to permanently / irreversibly transform/ destroy a recognised	

biodiversity 'hot-spot' or threaten the existence of a species or sub-species.	
Motivation: The impacts have been assessed and mitigations measures provided in a draft EMPr.	

Index	Sense of Place Impact and / or Heritage Impact Description of variable	Place an "x" in the appropriate box
	The activity is in keeping with the surrounding environment and / or does not negatively impact on the affected area's sense of place and /or heritage	✓
	The activity is not in keeping with the surrounding environment and will have a localised impact on the affected area's sense of place and/or heritage	
	The activity is not in keeping with the surrounding environment and will have a significant impact on the affected area's sense of place and/ or heritage	
	The activity is completely out of keeping with the surrounding environment and will have a significant impact on the affected area's sense of place and/ or heritage	
	Motivation: The impacts have been assessed and mitigations measures provided in a draft EMPr.	

Index	Pollution Impact Description of variable	Place an "x" in the appropriate box
	The activity is not giving, has not given and will not give rise to any pollution	
	The activity is giving, has given or could give rise to pollution with low impacts.	✓
	The activity is giving, has given or could give rise to pollution with moderate impacts.	
	The activity is giving, has given or could give rise to pollution with high impacts.	
	The activity is giving, has given or could give rise to pollution with major impacts.	
	Motivation: Implementation of EMPr should result in negligible pollution impacts	

PART 2: COMPLIANCE HISTORY AND KNOWLEDGE OF THE APPLICANT

Index	Previous administrative action (i.e. administrative enforcement notices) issued to the applicant in respect of a contravention of section 24F(1) of the National Environmental Management Act and/or section 20(b) of the National Environmental Management Waste Act Description of variable	Place an "x" in the appropriate box
	Administrative action was previously taken against the applicant in respect of the abovementioned provisions.	
	No previous administrative action was taken against the applicant but previous administrative action was taken against a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time when the administrative action was taken.	
	Administrative action was **not** previously taken against the applicant in respect of the abovementioned provisions.	✓
	Explanation of all previous administrative action taken in respect of the above: Refer to Appendix J	

Index	Previous Convictions in terms of section 24F(1) of the National Environmental Management Act and/or section 20(b) of the National Environmental Management Waste Act	Place an "x" in the appropriate

Description of variable	box
The applicant was previously convicted in terms of either or both of the abovementioned provisions.	
No previous convictions have been secured against the applicant but a conviction has been secured against a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time; or a conviction was secured against a director of the applicant in his or her personal capacity.	
The applicant has not previously been convicted in terms of either or both of the abovementioned provisions.	✓
Explanation of all previous convictions in respect of the above: Refer to Appendix J	

Index	Number of section 24G applications previously submitted by the applicant Description of variable	Place an "x" in the appropriate box
	Previous applications in terms of section 24G of NEMA were submitted by the applicant.	
	No previous applications have been submitted by the applicant but a previous application(s) have been submitted by a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time.	
	No previous applications have been submitted by the applicant but the applicant sat on the board of a firm that previously submitted an application.	
	Explanation in respect of all previous applications submitted in terms of section 24G:	

PART 3: APPLICANT'S PERSONAL CIRCUMSTANCES

Index	Applicant's legal persona Description of variable	Place an "x" in the appropriate box
	The applicant is a natural person.	
	The applicant is a firm.	✓
	Describe the firm: Sapphire Ocean Investments (RF) (Pty) Ltd	

Index	Any other relevant information that the applicant would like to be considered.
	Motivate and explain fully: The applicant is the new landowner and is proposing to develop light industrial workshops and storage warehouses on this site. The previous landowner commenced with removal of indigenous vegetation prior to submitting an application for environmental authorisation for the relevant NEMA listed activities. The current landowner is following the NEMA S24G process to rectify the illegal commencement; this activity has been assessed as part of this application. The impacts of the proposed activity by the new landowner has been assessed for construction and operational phase. The EAP has provided all relevant information required for the competent authority to make an informed decision.

NOTE: An explanation as to why the applicant did not obtain an environmental authorisation and/or waste management licence must be attached to this application.

SECTION D: PRELIMINARY ADVERTISEMENT

When submitting this application form, the applicant must attach proof that the application has been advertised in at least one local newspaper in circulation in the area in which the activity was commenced, and on the applicant's website, if any.

The advertisement must state that the applicant commenced a listed or specified activity or activities or waste management activity or activities without the necessary environmental authorisation and/or waste management licence and is now applying for *ex post facto* approval. It must include the following:

- the date;
- the location;
- the applicable legislative provision contravened; and
- the activity or activities commenced with without the required authorisation.

Interested and affected parties must be provided with the details of where they can register as an interested and affected party and / or submit their comment. At least 20 days must be provided in which to do so.

This advertisement shall be considered as a preliminary notification and the competent authority may direct the applicant to undertake further public participation and advertising after receipt of this application form.

NOTE: Unless protected by law, all information contained in and attached to this application form may become public information on receipt by the competent authority. This application must be attached to any documentation or information submitted by an applicant further to section 24G(1).

Refer to Appendix G

PART 3 - APPENDICES

The following appendices must, where applicable, be attached to this form:

Appendix		Tick the box if Appendix is attached
Appendix A:	**Locality map**	✓
Appendix B:	**Site plan(s)**	✓
Appendix C:	**Building plans (if applicable)**	✓
Appendix D:	**Colour photographs**	
Appendix E:	**Biodiversity overlay map**	✓
Appendix F:	**Permit(s) / license(s) from any other organ of state including service letters from the municipality**	
Appendix G:	**Public participation information: including a copy of the register of interested and affected parties, the comments and responses report, proof of notices, advertisements, Land owner consent and any other public participation information as required in Section J above.**	✓
Appendix H:	**Specialist Report(s), if any**	✓
Appendix I:	**Environmental Management Programme**	✓
Appendix J:	**Supporting documents relating to compliance/enforcement history of the applicant, including but not limited to, Pre-compliance/compliance notices, Pre-directives/directives etc.**	✓
Appendix K:	**Certified copy of Identity Document of Applicant**	✓
Appendix L:	**Certified copy of the title deed (or title deeds in the case of linear activities)**	✓
Appendix M:	**Any Other (if applicable) (describe) – DFFE Screening Tool Report**	✓

Where an application has been made in terms of the waste management activities, please complete and annex Annexure 1 as in the following:

Annexures for waste listed activity/ies supporting information		Tick the box if Annexure is attached
Annexure 1	Waste listed activities supporting information (as in prescribed attached form)	
Other	(please list accordingly)	

DECLARATIONS

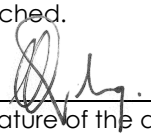
The applicant

Note: Duplicate this section where there is more than one applicant

- I ..... Mr Erno Janse van Rensburg ...., in my personal capacity or duly authorised as ..... (state capacity) by ... Sapphire Ocean Investments (RF) (Pty) Ltd ... thereto hereby declare/affirm that all the information contained in this application to be true and correct, and that I:
- am fully aware of my responsibilities in terms of t the National Environmental Management Act of 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations") in terms of NEMA, the National Environmental Management: Waste Act, 2008 (Act 59 of 2008) ("NEM:WA") and all relevant specific environmental management Act(s), and that failure to comply with these requirements may constitute an offence in terms of the environmental legislation;
- appointed the environmental assessment practitioner as indicated above, which meet all the requirements in terms of Regulation 13 of the EIA Regulations to act as the independent Environmental Assessment Practitioner for this application;
- have provided the environmental assessment practitioner and the competent authority with access to all information at my disposal that is relevant to the application;
- am aware that I may be issued with a directive and that I must comply with such a directive;
- am fully aware of the administrative fine to be paid before a decision, with respect to the continuation of the listed activity(ies), will be made;
- will be responsible for the costs incurred in complying with the environmental legislation including but not limited to –
    - costs incurred in connection with the appointment of the environmental assessment practitioner or any specialist appointed in terms of Regulation 13 of the EIA Regulations);
    - costs incurred in respect of the undertaking of any process required in terms of this application;
    - costs in respect of any prescribed fee payable in respect of this application;
    - costs in respect of specialist reviews, if the competent authority decides to recover costs;
    - the provision of security to ensure compliance with the applicable management and mitigation measures; and
    - fine costs
- am responsible for complying with the conditions that might be attached to any decision(s) issued by the competent authority;
- have the ability to implement the applicable management, mitigation and monitoring measures; and
- hereby indemnify, the government of the Republic of South Africa, the competent authority and all its officers, agents and employees, from any liability arising out of, inter alia, the content of any report, any procedure or any action for which the applicant or environmental assessment practitioner is responsible.

  am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (

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



Signature of the applicant:

Erasmus Cornelius Janse van Rensburg

Name:

Sapphire Ocean Investments (Pty) Ltd

Name of Firm (if applicable):

25 Aug 2025

Date:

THE INDEPENDENT ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I .....Claire De Jongh....., as the appointed independent environmental practitioner ("EAP") hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that I:

- act/ed as the independent EAP in this application;
- regard the information contained in this application to be true and correct, and
- do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the National Environmental Management Act of 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations") in terms of NEMA, the National Environmental Management: Waste Act, 2008 (Act 59 of 2008) ("NEM:WA") and the relevant specific environmental management Act(s);
- have and will not have any vested interest in the proposed activity proceeding;
- have disclosed, to the applicant and competent authority, any material information that have or may have the potential to influence the decision of the competent authority or the objectivity of any report, plan or document required in terms of the NEMA, the EIA Regulations, the NEM:WA and any specific environmental management Act(s);
- am able to meet the responsibilities in terms of NEMA, the EIA Regulations (specifically in terms of Regulation 13 of the EIA Regulations, 2014) and any specific environmental management Act, and am fully aware that failure to comply with these requirements may constitute and result in disqualification;
- have ensured that information containing all relevant facts in respect of the application was distributed or made available to interested and affected parties and the public and that participation by interested and affected parties was facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- have ensured that the comments of all interested and affected parties were considered, recorded and submitted to the competent authority in respect of the application;
- have kept a register of all interested and affected parties that participated in the public participation process; and
- have provided the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not.
- am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations

Note: The terms of reference must be attached.

Signature of the environmental assessment practitioner:

Independent / self employed - subcontracted by Ecorute as EAP for applicaiton

Name of company:

25 August 2025

Date:

PART 4 -

ANNEXURE B - SUPPORTING INFORMATION WHERE THE ACTIVITY BEING APPLIED FOR IS A LISTED WASTE MANAGEMENT ACTIVITY/IES (IF RELEVANT)

1. WASTE QUANTITIES

Indicate or specify types of waste and list the estimated quantities (expected to be) managed daily (should you need more columns; you are advised to add more)

Note: In this case of hazardous waste, the National Department of Environmental Affairs is the relevant competent authority to consider the 24G application.

Non-hazardous waste	Total waste handled (tonnes per day)

Source of information supplied in the table above Mark with an "X"

Determined from volumes	
Determined with weighbridge/scale	
Estimated	

1.1. Recovery, Reuse, Recycling, treatment and disposal quantities:

Indicate the applicable waste types and quantities expected to be disposed of and salvaged annually:

TYPES OF WASTE	MAIN SOURCE (NAME OF COMPANY)	QUANTITIES		ON-SITE RECOVERY REUSE RECYCLING TREATMENT OR DISPOSAL	OFFSITE RECOVERY REUSE RECYCLING TREATMENT OR DISPOSAL	OFFSITE DISPOSAL
		Tons/ Month	M^3/ Month	Method & Location	Method & Location and Contractor details	

2. GENERAL

Prevailing wind direction (e.g. NWW)

November – April	
May - October	

The size of population to be served by the facility:

	Mark with "X"	Comment
0-499		

500-9,999		
10,000-199,999		
200,000 upwards		

LANDFILL PARAMETERS (If applicable)

The method of disposal of waste:

Land-building ☐ Land-filling ☐ Both ☐

The dimensions of the disposal site in metres

	At commencement	After rehabilitation

The total volume for the disposal of waste on the site:

Volume Available	Mark with "X"	Source of information (Determined by surveyor/ Estimated)
Up to 99		
100-34 999		
35 000- 3,5 million		
>3,5 million		

The total volume already used for waste disposal on the site:

(a) Will the waste body be covered daily	Yes	No
(b) Is sufficient cover material available	Yes	No
(c) Will waste be compacted daily	No	No

If the answers (a) and/or (b) are No, what measures will be employed to prevent the problems of burning or smouldering of waste and the generation of nuisance?

The Salvage method

Mark with an "X" the method to be used.

At source	
Recycling installation	
Formal salvaging	
Contractor	
No salvaging planned	

Fatal flaws for the site:
Indicate which of the following apply to the facility for a waste management activity:

Within a 3000m radius of the end of an airport landing strip	Yes	No
Within the 1 in 50-year flood line of any watercourse	Yes	No
Within an unstable area (fault zone, seismic zone, dolomitic area, sinkholes)	Yes	No
Within the drainage area or within 5 km of water source	Yes	No
Within the drainage area or within 5 km of water source	Yes	No
Within an area adjacent to or above an aquifer	Yes	No
Within an area with shallow bedrock and limited available cover material	Yes	No
Within 100 m of the source of surface water	Yes	No
Within 1km from the wetland	Yes	No

Indicate the distance to the boundary of the nearest residential area	metres
Indicate the distance to the boundary of the industrial area	metres

Wettest six months of the year

November- April	
May -October	

For the wettest six-month period indicated above, indicate the following for the preceding 30 years

	Total rainfall for 6 months	Total rainfall for 6 months	Total rainfall for 6 months
For the 1st wettest year			
For the 2nd wettest year			
For the 3rd wettest year			
For the 4th wettest year			
For the 5th wettest year			
For the 6th wettest year			
For the 7th wettest year			
For the 8th wettest year			
For the 9th wettest year			
For the 10th wettest year			

Location and depth of ground water monitoring boreholes:

Codes of the boreholes	Borehole locality	Depth (m)	Latitude	Longitude
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "

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			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "

Location and depth of landfill gas monitoring test pit:

Codes of the boreholes	Borehole locality	Latitude	Longitude
		° ' "	° ' "
		° ' "	° ' "
		° ' "	° ' "
		° ' "	° ' "
		° ' "	° ' "
		° ' "	° ' "