Western Cape Government

Department of Environmental Affairs and Development Planning

BASIC ASSESSMENT REPORT

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

APRIL 2024

BASIC ASSESSMENT REPORT

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

January 2026

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

GENERAL PROJECT DESCRIPTION

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

Proposed housing development, Farm 1388, Kuils River, Western Cape.

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

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

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

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

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

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

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

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

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

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

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

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

6. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.

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

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

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

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

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

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

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

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

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

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

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

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	
Site Plan:	Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following: • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. • The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. • The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development **must** be clearly indicated on the site plan. • Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. • Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): o Watercourses / Rivers / Wetlands o Flood lines (*i.e.*, 1:100 year, 1:50 year and 1:10 year where applicable);

	○ Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): ○ Ridges; ○ Cultural and historical features/landscapes; ○ Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as **Appendix C**. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as **Appendix D**.
Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as **Appendix A3**.

ACRONYMS

DAFF:	Department of Forestry and Fisheries
DEA:	Department of Environmental Affairs
DEA& DP:	Department of Environmental Affairs and Development Planning
DHS:	Department of Human Settlement
DoA:	Department of Agriculture
DoH:	Department of Health
DWS:	Department of Water and Sanitation
EMPr:	Environmental Management Programme
HWC:	Heritage Western Cape
NFEPA:	National Freshwater Ecosystem Protection Assessment
NSBA:	National Spatial Biodiversity Assessment
TOR:	Terms of Reference
WCBSP:	Western Cape Biodiversity Spatial Plan
WCG:	Western Cape Government

ATTACHMENTS

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

The following checklist of attachments must be completed.

APPENDIX			**✓ (Tick) or x (cross)**
Appendix A:	**Maps**		
	Appendix A1:	**Locality Map**	✓
	Appendix A2:	**Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning**	**X**
	Appendix A3:	**Map with the GPS co-ordinates for linear activities**	**X**
Appendix B:	**Appendix B1:**	**Site development plan(s)**	✓
	Appendix B2	**A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;**	**X**
Appendix C:	**Photographs**		**X**
Appendix D:	**Biodiversity overlay map**		✓
Appendix E:	**Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.**		
	Appendix E1:	**Final comment/ROD from HWC**	✓
	Appendix E2:	**Copy of comment from Cape Nature**	To be included in the Post-Application BAR
	Appendix E3:	**Final Comment from the DWS**	To be included in the Post-Application BAR
	Appendix E4:	**Comment from the DEA: Oceans and Coast**	**X**
	Appendix E5:	**Comment from the DAFF**	To be included in the Post-Application BAR
	Appendix E6:	**Comment from WCG: Transport and Public Works**	To be included in the Post-Application BAR
	Appendix E7:	**Comment from WCG: DoA**	To be included in the Post-Application BAR
	Appendix E8:	**Comment from WCG: DHS**	**X**
	Appendix E9:	**Comment from WCG: DoH**	To be included in the Post-Application BAR

	Appendix E10:	**Comment from DEA&DP: Pollution Management**	To be included in the Post-Application BAR
	Appendix E11:	**Comment from DEA&DP: Waste Management**	To be included in the Post-Application BAR
	Appendix E12:	**Comment from DEA&DP: Biodiversity**	To be included in the Post-Application BAR
	Appendix E13:	**Comment from DEA&DP: Air Quality**	**X**
	Appendix E14:	**Comment from DEA&DP: Coastal Management**	**X**
	Appendix E15:	**Comment from the local authority**	To be included in the Post-Application BAR
	Appendix E16:	**Confirmation of all services (water, electricity, sewage, solid waste management)**	✓
	Appendix E17:	**Comment from the District Municipality**	To be included in the Post-Application BAR
	Appendix E18:	**Copy of an exemption notice**	**X**
	Appendix E19	**Pre-approval for the reclamation of land**	**X**
	Appendix E20:	**Proof of agreement/TOR of the specialist studies conducted.**	**X**
	Appendix E21:	**Proof of land use rights**	**X**
	Appendix E22:	**Proof of public participation agreement for linear activities**	**X**
Appendix F:	**Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.**		**X**
Appendix G:	**Specialist Report(s)**	**Appendix G1: Aquatic Biodiversity Assessment** **Appendix G2: Floodline Delineation** **Appendix G3: Terrestrial Compliance Statement** **Appendix G4: Traffic Impact Assessment** **Appendix G5: Tree Study** **Appendix G6: Agricultural Impact Assessment**	✓
Appendix H:	**EMPr**		✓
Appendix I:	**Appendix I1: Screening Tool Report** **Appendix I2: SSVR**		✓
Appendix J:	**The impact and risk assessment for each alternative**		**X**
Appendix K:	**Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline**		**X**
Appendix…..	**Any other attachments must be included as subsequent appendices**		**X**

Appendix L:	**Zoning Map**	✓
Appendix M:	**LUMS Plans**	✓
Appendix N:	**Civils Proposal**	✓
Appendix O:	**Electrical Report**	✓
Appendix P:	**Engineering – Floodline Map**	✓

SECTION A: ADMINISTRATIVE DETAILS

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

Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	Sal Qureshi	
Name of contact person for Applicant/Proponent (if other):		
Company/ Trading name/State Department/Organ of State:	Azalea Ventures Pty Ltd	
Company Registration Number:	2019/162331/07	
Postal address:	PO Box 36323, Glosderry, Kenilworth, Western Cape	
		Postal code: 7702
Telephone:	N/A	Cell: 064 696 3364
E-mail:	sal@hamiltonestate.co.za	Fax: N/A
Company of EAP:	Sillito Environmental Consulting	
EAP name:	Chantel Muller (2019/1362) & Jonathan Lassen (2024/8038)	
Postal address:	Suite 401, Tokai on Main, 2 Burchell Road, Tokai, 7945	
Telephone:	021 712 5060	Cell: 076 785 7736
E-mail:	jonathan@environmentalconsultants.co.za	Fax: N/A
Qualifications:	**Lead EAP: Chantel Muller** M Phil in Environmental Management (2008) BA in Social Dynamics (2004) Chantel Muller is a registered EAP with EAPSA (2019/1362) as well as a member of the International Association for Impact Assessment (IAIA). Chantel is also an Accredited Professional with the Green Building Council of South Africa. **Candidate EAP: Jonathan Lassen** Advanced Diploma in Marine Sciences (2021), candidate registered EAP (2024/8038).	
EAP registration no:	Chantel Muller (2019/1362) & Jonathan Lassen (2024/8038)	
Duplicate this section where there is more than one landowner Name of landowner:	**Same as Applicant**	
Name of contact person for landowner (if other):		
Postal address:		
		Postal code:
Telephone:	( )	Cell:
E-mail:		Fax: ( )
Name of Person in control of the land:	**Same as Applicant**	
Name of contact person for person in control of the land:		
Postal address:		
		Postal code:
Telephone:	( )	Cell:
E-mail:		Fax: ( )

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	City of Cape Town – Development Management	
Contact person:	Yunus Hugo	
Postal address:	16th Floor, 12 Hertzog Boulevard, Cape Town, 8001	
Telephone	+27(0) 21 401 4702	Cell: N/A
E-mail:	Yunus.hugo@capetown.gov.za	Fax: N/A

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

1.	Is the proposed development (please tick):	New	X	~~Expansion~~	
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				
The proposed site is a brownfield site because the site is partially developed and there is existing infrastructure (a school) present on the site.					
~~3.~~	**~~For Linear activities or developments~~**				
~~3.1.~~	~~Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:~~				
~~3.2.~~	~~Development footprint of the proposed development for all alternatives.~~				~~m²~~
~~3.3.~~	~~Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.~~				
~~3.4.~~	~~Indicate how access to the proposed routes will be obtained for all alternatives.~~				
~~3.5.~~	~~SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives~~				
~~3.6.~~	**~~Starting point co-ordinates for all alternatives~~**				
	~~Latitude (S)~~	~~º~~	~~'~~	~~"~~	
	~~Longitude (E)~~	~~º~~	~~'~~	~~"~~	
	~~Middle-point co-ordinates for all alternatives~~				
	~~Latitude (S)~~	~~º~~	~~'~~	~~"~~	
	~~Longitude (E)~~	~~º~~	~~'~~	~~"~~	
	~~End point co-ordinates for all alternatives~~				
	~~Latitude (S)~~	~~º~~	~~'~~	~~"~~	
	~~Longitude (E)~~	~~º~~	~~'~~	~~"~~	
~~Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.~~					
4.	**Other developments**				
4.1.	Property size(s) of all proposed site(s):				26.22 Ha
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):				6.02 Ha
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:				12.15 Ha
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).				

The proposed residential development on Farm 1388 is strategically positioned along the western bank of the Kuils River, north of Wesbank and east of Belhar in Cape Town, Western Cape. The project aims to create a well-integrated residential community, offering 436 Single Residential (SR1) erven, two General Residential sites spanning 0.63 hectares (with an estimated yield of 50 units), and a 0.58-hectare General Business site to support local commercial needs. The development will feature a thoughtfully designed layout that ensures efficient service delivery, incorporating roads, stormwater drainage, water supply, and sanitation systems to meet the needs of future residents.

Located within a growing urban corridor, the development aligns with regional planning objectives by expanding housing availability while integrating sustainable infrastructure solutions. The site benefits from proximity to existing municipal services; however, upgrades and extensions will be necessary to accommodate the proposed density. Primary access to the development will be established through a south-westward extension of Reuter Street, with Old Nooiensfontein Road serving as a secondary entry point.

Farm 1388 is bordered by an existing residential area to the north and the Kuils River to the east, with the Betel Primary School centrally located within the site, effectively dividing it into two sections. Of the total site area, 12.15 hectares are allocated for housing development. The terrain is relatively flat, with a gentle west-to-east slope toward the river. Currently, the site is largely undeveloped, featuring grass, scattered trees, and small wetland/marshy areas in the lower lying eastern portion. Basic municipal infrastructure exists to support the Betel Primary School, including temporary roads, sewer, water, and stormwater services.

Sanitation infrastructure includes a 200mm sewer line running along the northeastern boundary, flowing southeast toward the Nooiensfontein Pump Station. A temporary 160mm sewer line serves the school, connecting to a 200mm collector at Old Nooiensfontein Drive. Wastewater from the development will fall within the Bellville Wastewater Treatment Works (WWTW) catchment, which has sufficient treatment capacity. Regarding water supply, limited-service information is available, with a 160mm reticulation line at Dorothy Street and a 110mm line at Bhokwe Road, both northwest of the site. Larger distribution mains, including a 700mm and 800mm main along Stellenbosch Arterial and a 450mm main along the R300 highway, are located farther away. The existing stormwater network consists of a 525mm pipeline along the northeastern section, discharging into a 600mm pipeline that flows into the Kuils River, supplemented by a 375mm pipe network servicing the school.

Access to the site is currently restricted to Old Nooiensfontein Road, which connects to Betal Primary School Road via a low bridge crossing over the Kuils River. However, this segment of Old Nooiensfontein Road requires realignment to fall within the designated road reserve. Additionally, Betal Primary School Road, currently serving as temporary access, will be demolished, and a new access route for the school will be incorporated into the proposed road network. As per the Traffic Impact Assessment (TIA), the primary access point for the development will be via Reuter Street's south-westward extension, with Old Nooiensfontein Road acting as a secondary access route.

The project entails the installation of comprehensive municipal services to support the high-density residential development. The scope of work includes bulk earthworks, internal road construction, stormwater management infrastructure, a water supply reticulation network with individual erf connections, and a sewer reticulation system to service all residential units. This initiative represents a significant step toward sustainable urban expansion, enhancing housing opportunities while contributing to the broader economic and infrastructural development of the region.

Refer to Site Layout Plans included in Appendix B1.

Figure 1. Locality Map (Cape Farm Mapper, 2025)

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

Currently, access to the site is limited to Old Nooiensfontein Road, which connects to Petal Primary School Road on the western side of the Kuils River low bridge crossing. However, this section of Old Nooiensfontein Road requires realignment to fall within the designated road reserve. Additionally, Petal Primary School Road, which currently serves as a temporary access route, will be demolished, and new school access will be incorporated into the proposed road network. According to the Traffic Impact Assessment (TIA), the primary access to the development will be via a south-westward extension of Reuter Street, while Old Nooiensfontein Road will serve as a secondary access point.

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	1	6	0	0	0	0	0	0	0	0	1	3	8	8	0	0	0	0	0

4.7.	Coordinates of the proposed site(s) for all alternatives:			
	Latitude (S)	**33°**	**57'**	**2"**
	Longitude (E)	**18°**	**39'**	**54"**

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

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

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

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

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.	~~YES~~	NO
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.	~~YES~~	NO
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3.	YES	~~NO~~
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	~~YES~~	NO

The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")	~~YES~~	NO
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	~~YES~~	NO
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	~~YES~~	NO
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.	~~YES~~	NO

3. Other legislation

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

National Water Act: Due to the sites proximity to the Kuils River and the presence of watercourse on site, a WULA application will need to be undertaken, and the Department of Water & Sanitation will need to provide their approval prior to the commencement of any development activities on site.

4. Policies

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

National Policies and Frameworks

- National Environmental Management Act (NEMA), 1998
- Spatial Planning and Land Use Management Act (SPLUMA), 2013
- National Development Plan (NDP 2030)
- National Water Act (NWA), 1998
- National Environmental Management: Biodiversity Act (NEMBA), 2004
- National Environmental Management: Waste Act (NEM:WA), 2008
- National Environmental Management: Air Quality Act (NEM:AQA), 2004
- Guidelines for Human Settlement Planning and Design ("Red Book", 2019)
- Guidelines for the Provision of Engineering Services for Residential Townships ("Blue Book")

Provincial Policies and Guidelines (Western Cape)

- Western Cape Provincial Spatial Development Framework (PSDF)
- Western Cape Climate Change Response Strategy
- Western Cape Biodiversity Spatial Plan (WCBSP) and Handbook
- Western Cape Environmental Implementation Plan (EIP)
- Western Cape Sustainable Human Settlement Strategy

Municipal Policies and By-laws (City of Cape Town)

- City of Cape Town Municipal Spatial Development Framework (MSDF)
- District Spatial Development Framework (Northern District)
- City of Cape Town Development Management Scheme (DMS)
- Management of Urban Stormwater Impacts Policy (2015)
- Water Sensitive Urban Design (WSUD) Guideline (CoCT)
- Standards & Guidelines for Roads and Stormwater (Version 4, 2024)
- Water and Sanitation Service Standards (Version 3.3, 2019)
- Public Lighting Guidelines (CoCT)
- Electrical Reticulation Standards (CEE-30)
- Integrated Waste Management By-law and City Waste Minimisation Policy

5. Guidelines

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

These guidelines were used to guide the EAP to ensure all the requirements with regards to the consideration of alternatives, public participation, and procedures to assess the need and desirability were assessed and inquired.

- Guideline Document, EIA Regulations, Implementation of Sections 21, 22 and 26 of the Environment Conservation Act, 1998
- DFFE Integrated Environmental Management Guideline Series, Guideline 3: General Guide to the Environmental Impact Assessment Regulations, 2006
- DFFE Integrated Environmental Management Guideline Series, Guideline 4: Public Participation in support of the Environmental Impact Assessment Regulations, 2006
- DFFE Integrated Environmental Management Guideline Series, Guideline 5: Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations, 2006
- DFFE Companion to the NEMA EIA Regulations of 2010
- DFFE Integrated Environmental Management Guideline Series, Guideline 5: Companion to the Environmental Impact Assessment Regulations, 2012
- DEA&DP Guideline Document: Guideline on Alternatives, March 2013
- DEA&DP Guideline Document: Guideline on Public Participation, March 2013
- DEA&DP Guideline Document: Guideline on Need and Desirability, March 2013
- DEA&DP Guideline for determining the scope of specialist involvement in the EIA process, June 2005
- DEA&DP Guideline for the review of specialist input in the EIA process, June 2005

6. Protocols

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

DEA Screening Tool (Appendix D): The table below indicates the level of sensitivity of each of the themes identified in the National Web based Screening Tool Report, dated March 2025. The SSVR attached as **Appendix E**, further discusses the below sensitivities.

Theme	Very High Sensitivity	High Sensitivity	Medium Sensitivity	Low Sensitivity
Agriculture Theme		X		
Animal Species Theme			X	
Aquatic Biodiversity Theme	X			
Archaeological & Cultural Heritage				X
Civil Aviation Theme	X			
Defense Theme			X	
Paleontology Theme				X
Plant Species Theme			X	
Terrestrial Biodiversity Theme	X			

Agricultural Impact Assessment

The Agricultural Compliance Statement, prepared by SoilZA (J. Lanz, Pr.Sci.Nat. 400268/12), verified the agricultural sensitivity of the site in accordance with the Agricultural Protocol (GN 320 of 2020). Although the national screening tool

identified the site as medium to high sensitivity, the specialist's field assessment found this classification to be overestimated. The site is surrounded by urban development, is small (20.2 ha cadastral extent), highly transformed, isolated from productive agricultural land, and lacks any agricultural infrastructure. These factors make the land impractical and uneconomic for commercial crop production. The specialist therefore verified the entire site as low agricultural sensitivity and concluded that the proposed development will result in negligible loss of future agricultural production potential. No mitigation is required, and the development is considered acceptable from an agricultural perspective.

Aquatic Biodiversity Assessment

The study identified the Kuils River along the eastern boundary as a high sensitivity aquatic feature supporting seasonal wetland habitat and riparian vegetation. The area provides ecological connectivity and flood attenuation functions. It concluded that direct development within the floodplain or riparian zone must be avoided, with a minimum buffer of 32 m maintained. Implementation of stormwater quality management measures, vegetated swales, and litter traps will adequately protect downstream water quality and aquatic integrity.

Terrestrial Biodiversity Compliance Statement

The terrestrial assessment confirmed that the site is highly disturbed due to historical clearing, dumping, and surrounding urban expansion. Indigenous vegetation remnants are absent, and the area falls within a transformed biodiversity zone in the Western Cape Biodiversity Spatial Plan. The site does not contain any Critical Biodiversity Areas (CBAs), Ecological Support Areas (ESAs), or listed threatened ecosystems. The report concluded that the proposed development would have a negligible terrestrial biodiversity impact provided standard alien vegetation control and landscaping with indigenous species are implemented.

Floodline Delineation Reports

Two floodline delineation studies were undertaken to inform the proposed development. The first, prepared by The Biodiversity Company (2025), was based on 5-metre topographical data and online modelling software, providing an indicative 1:100-year floodline for environmental screening purposes. The study determined that approximately 40% of the site falls within the modelled floodplain and recommended maintaining this as a no-go area to protect the Kuils River and associated riparian habitat.

A subsequent and more detailed Engineering Floodline Assessment (E2C Consulting Engineers, 2025) was undertaken using survey-verified topographical data and hydraulic modelling, providing a refined and more accurate representation of the flood extent. The engineering floodline delineation confirms the extent of the 1:100-year floodplain and has been used to guide the final layout design, ensuring that all development remains outside the flood-affected area. The engineering floodline is therefore regarded as the definitive hydrological reference for the project, while the TBC study supports the environmental context and screening process.

Traffic Impact Assessment (TIA)

The TIA evaluated access and trip generation for approximately 486 residential and business units. Primary access is via the southward extension of Reuter Street, with secondary access from Old Nooiensfontein Road. The study found that existing roads have sufficient capacity and sight distance, requiring only minor intersection improvements and signage. It concluded that the development would have a low traffic impact and is acceptable from a transport and safety perspective.

Civil Engineering Services Preliminary Design Report

The civil report addressed *bulk earthworks, roads, stormwater, water, and sewer* design for approximately 12.15 ha of developable area. It confirmed *adequate municipal capacity* for water and sanitation services through connection to the *Belhar PRV zone* and *Bellville WWTW*. Stormwater will be managed through swales and attenuation ponds designed

to maintain pre-development runoff rates. The study concluded that the *site is serviceable using standard municipal infrastructure* and that the design aligns with CoCT and national design standards.

Electrical Engineering Report

The electrical study proposed connection to the *City of Cape Town 11 kV network* via a new substation (S-STN-1) to be shared with adjacent Hamilton Estate. Four mini-substations (500–800 kVA) will distribute power within the site. The estimated peak demand is *1.9 MVA*, including residential and limited business use. The report confirmed *sufficient capacity within the planned network* and compliance with CoCT electrical reticulation standard CEE-30 and SANS specifications.

Tree Survey

The tree survey identified four mature non-indigenous trees on the property: *Melia azedarach, Phoenix canariensis, Pinus pinea, and Eucalyptus grandis* (stump). None are protected species under NEMBA or the CoCT Tree By-law. The report recommended complete removal due to poor condition and conflict with proposed infrastructure. Indigenous replacement planting and landscape rehabilitation are recommended as part of the final landscaping plan.

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 1**	Describe the portion of the proposed development to which the applicable listed activity relates.
19	*"The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;* *but excluding where such infilling, depositing, dredging, excavation, removal or moving-* *(a) will occur behind a development setback;* *(b) is for maintenance purposes undertaken in accordance with a maintenance management plan;* *(c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;* *(d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or* *(e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies."*	There are watercourses present within the proximity of the proposed development area and as a result infilling of specific areas will be required. As confirmed in the feedback received on the NOI, dated the 23 June 2025, **this activity will be triggered.**
27	"*The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for-* *(i) the undertaking of a linear activity; or* *(ii) maintenance purposes undertaken in accordance with a maintenance management plan."*	As confirmed by the specialist, within the Terrestrial Biodiversity Compliance Statement: The site is highly disturbed due to historical clearing, dumping, and surrounding urban expansion. Indigenous vegetation remnants are absent, and the area falls within a transformed biodiversity zone in the Western Cape Biodiversity Spatial Plan. The site does not contain any Critical Biodiversity Areas (CBAs), Ecological

		Support Areas (ESAs), or listed threatened ecosystems. The report concluded that the proposed development would have a negligible terrestrial biodiversity impact It is therefore the opinion of the EAP that this listed activity **will not** be triggered.
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* *excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.*	The development footprint will exceed 5 hectares, which is above the specified threshold, and the site falls within the Kuils River urban edge. It is therefore the opinion of the EAP that this listed activity **will be triggered** by the proposed development.
Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 3**	Describe the portion of the proposed development to which the applicable listed activity relates.
12	*"The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.* ***i. Western Cape*** *i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;* *ii. Within critical biodiversity areas identified in bioregional plans;* *iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas;* *iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or* *v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister."*	As confirmed by the specialist, within the Terrestrial Biodiversity Compliance Statement: The site is highly disturbed due to historical clearing, dumping, and surrounding urban expansion. Indigenous vegetation remnants are absent, and the area falls within a transformed biodiversity zone in the Western Cape Biodiversity Spatial Plan. The site does not contain any Critical Biodiversity Areas (CBAs), Ecological Support Areas (ESAs), or listed threatened ecosystems. The report concluded that the proposed development would have a negligible terrestrial biodiversity impact It is therefore the opinion of the EAP that this listed activity **will not** be triggered.
Note: • The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted. • Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.		

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

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

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

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

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

The preferred alternative entails the establishment of a mixed-use residential development on Remainder Farm 1388, Kuils River, situated along the western bank of the Kuils River within the City of Cape Town municipal area. The proposal encompasses the development of approximately 12.15 ha of the 20.2 ha property, comprising:

- ±436 Single Residential 1 (SR1) erven.
- 2 General Residential erven (±0.63 ha, yielding approximately 50 units).
- 1 General Business erf (±0.58 ha) to accommodate local convenience and community services; and
- Internal public roads, pedestrian sidewalks, stormwater management infrastructure, landscaped public open space, and bulk service connections to the municipal network.

Access will be obtained primarily from the southward extension of Reuter Street, with secondary access via Old Nooiensfontein Road. The layout has been designed to respect the Kuils River floodline, maintain an ecological buffer along the eastern boundary, and integrate stormwater swales and detention ponds to manage both water quality and quantity in accordance with CoCT standards.

The preferred alternative represents a compact, infill development within the existing urban edge that makes efficient use of existing bulk infrastructure, supports local housing demand, and avoids environmentally sensitive areas. It is considered the most feasible and sustainable configuration from environmental, engineering, and socio-economic perspectives.

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

The property, remainder Farm 1388, Kuils River, is currently zoned agricultural in terms of The City Of Cape Town Development Management Scheme (DMS) and is largely undeveloped, apart from the Bet-El Primary School for epilepsy located near the centre of the farm. The existing land use rights therefore permit low intensity agricultural activity but do not yet authorise residential or business development.

In support of the proposed housing project, the applicant, Azalea Ventures (Pty) Ltd has initiated a rezoning and subdivision application to allow the development of:

- Single residential 1 Erven (±436 units),
- General residential and general business erven, and
- Associated public roads, open spaces, and service infrastructure.

The rezoning and subdivision processes are being undertaken concurrently with the Environmental Authorisation process in accordance with section 41(2) of the Spatial Planning and Land Use Management Act (SPLUMA) and the city's municipal planning by-law. Once approved, these land use rights will formalise the intended development layout reflected in this bar. The proposed activity is therefore consistent with the land use change formally under consideration by the City Of Cape Town and aligns with the property's designation for *urban development* within the Municipal Spatial Development Framework (MSDF).

Proof of the current zoning and confirmation of the rezoning and subdivision application submission are attached in appendix E21.

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

There are no existing environmental or planning approvals in place for large scale residential development on Remainder Farm 1388, Kuils River. The only existing land use activity relates to the Bet-El Primary School for Epilepsy, which occupies a centrally located portion of the property and was historically authorised under an institutional land use right.

The proposed development layout has been designed to exclude and respect the footprint and operations of the Bet-El School, ensuring that its access, services, and safety buffers are maintained. The remainder of the property currently vacant and zoned Agricultural is subject to a new rezoning and subdivision application being processed by the City of Cape Town.

No previous environmental authorisations, rezoning approvals, or subdivision consents conflict with the current proposal. Coordination with the City's Spatial Planning and Environment Directorate confirmed that no overlapping approvals or pending applications exist that could affect the intended development.

Accordingly, the proposed housing development does not conflict with any existing rights or authorisations, and all necessary new approvals are being pursued through the appropriate concurrent statutory processes (Environmental Authorisation, Rezoning, and Subdivision).

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

The proposed development is consistent with the Western Cape Provincial Spatial Development Framework (PSDF), which promotes compact, efficient, and inclusive growth within existing urban areas. The site falls inside the urban footprint of the City of Cape Town and is directly accessible from established transport routes, namely the R300 and Stellenbosch Arterial. The development therefore supports the PSDF's objectives of spatial integration and resource efficiency by utilising existing bulk infrastructure and providing mixed income housing opportunities close to employment and services. Furthermore, the design respects environmental constraints by situating the developable platform above the 1:100-year floodline and incorporating on site attenuation and stormwater quality controls through the use of swales, bioretention areas, and litter traps in accordance with Water Sensitive Urban Design (WSUD) principles.

4.2	The Integrated Development Plan of the local municipality.

The proposal aligns with the City of Cape Town Integrated Development Plan (IDP), which identifies the need for well-located, serviced, and affordable housing opportunities as a municipal priority. The project contributes directly to the IDP's human settlement and infrastructure outcomes by providing approximately 486 residential units within a serviced urban area, supported by confirmed bulk capacity for water, sanitation, and electrical services. Access will be provided via the southward extension of Reuter Street and Old Nooiensfontein Road, both of which are consistent with the City's mobility framework. The inclusion of pedestrian facilities, energy efficient infrastructure, and local business opportunities further supports the IDP's emphasis on sustainable and inclusive development.

4.3.	The Spatial Development Framework of the local municipality.

In terms of the Municipal Spatial Development Framework (MSDF) and District Spatial Development Framework, the property is identified for consolidation and incremental urban infill. The project optimises an underutilised parcel adjacent to existing residential areas of Belhar and Wesbank, thereby strengthening the urban structure and providing improved linkages between communities. The layout promotes a walkable neighbourhood with mixed-use elements, internal open space, and accessible public streets. The design also accommodates a riparian buffer along the Kuils River, maintaining the ecological and recreational value of the green blue network promoted in the MSDF.

4.4.	The Environmental Management Framework applicable to the area.

The proposal is compatible with the objectives of the City of Cape Town Environmental Management Framework (EMF), particularly regarding watercourse protection and cumulative impact management. The development footprint has been carefully positioned outside the delineated floodplain and high sensitivity riparian corridor, with runoff directed through attenuation and treatment systems prior to discharge into the Kuils River. These measures will ensure that downstream water quality and flow regimes are maintained within acceptable limits. The EMF's emphasis on directing growth to already transformed areas while safeguarding natural corridors has been applied, and the project responds positively to this guidance.

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

The Western Cape Biodiversity Spatial Plan (WCBSP) and its accompanying Handbook strongly influenced the layout and environmental design of the project. According to the WCBSP mapping, the site lies within a transformed terrestrial area with no Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) intersecting the development footprint. However, the Kuils River along the eastern boundary is classified as a Very High aquatic sensitivity zone, and this informed the inclusion of a generous buffer, rehabilitation measures, and stormwater management infrastructure designed to protect the aquatic ecosystem. Alien vegetation removal and indigenous replanting within the open space corridors will further contribute to ecological restoration objectives. The development therefore fully aligns with the WCBSP's mitigation hierarchy of avoidance, minimisation, and rehabilitation, ensuring no loss of mapped biodiversity features and a net improvement in riparian function.

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

The Western Cape Biodiversity Spatial Plan (WCBSP) and accompanying Handbook (2017) played an important role in informing both the site selection and layout design of the proposed housing development. According to the WCBSP mapping, the terrestrial portion of Remainder Farm 1388 is classified as a Transformed Area and does not overlap any Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs). The adjacent Kuils River corridor, however, is identified as an Aquatic CBA and thus rated as Very High biodiversity sensitivity. This sensitivity determined the eastern development boundary and resulted in the inclusion of a conservation and stormwater management buffer along the river.

The design has accordingly been shaped by the WCBSP's mitigation hierarchy avoidance, minimisation, rehabilitation, and offsetting by avoiding direct encroachment into the aquatic CBA, minimising disturbance to the riparian zone, and providing on site rehabilitation through alien vegetation removal and indigenous re-vegetation of open space corridors. Stormwater attenuation, vegetated swales, and litter trap structures have been incorporated to protect downstream water quality and maintain ecological function. The WCBSP guidelines on integrating ecological infrastructure within urban form were used to ensure that the riparian buffer also functions as part of the public open space network.

Through these measures, the development achieves compliance with the intent of the WCBSP by concentrating urban expansion within already transformed areas, maintaining ecological connectivity along the Kuils River, and enhancing the biodiversity and water management functions of the remaining natural corridor.

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

N/A

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

N/A

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

The proposed development represents an efficient use of vacant, underutilised land located within the established urban edge of the City of Cape Town. Remainder Farm 1388 lies adjacent to existing residential suburbs (Belhar and Wesbank) and is already bordered by municipal services and road infrastructure. By introducing a mixed-use, medium density residential neighbourhood on land that has been previously transformed and is currently unused, the project prevents further outward urban sprawl and supports the principles of urban infill and densification promoted in the Municipal Spatial Development Framework. The design optimises the available land area through a compact street network, efficient erven configuration, and integration of shared open spaces, while maintaining a setback from the Kuils River floodline. This approach ensures that existing infrastructure networks are fully leveraged, thereby reducing the demand for new bulk services, minimising travel distances, and maximising socio-economic returns on already serviced land.

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

The proposed development has been deliberately planned to maximise the use of existing municipal infrastructure and resources within the surrounding urban network. The site is strategically located adjacent to established bulk service corridors for water, sanitation, stormwater, and electricity, all managed by the City of Cape Town. Engineering assessments confirm that sufficient spare capacity exists within the Belhar Pressure Reducing Valve (PRV) Zone for water supply and the Bellville Wastewater Treatment Works for sanitation, eliminating the need for major off-site upgrades. The project design also incorporates gravity fed drainage, underground stormwater networks, and detention ponds to manage runoff within the site, thereby reducing load on downstream systems. In addition, energy supply will be drawn from a planned City substation at Hamilton Estate, which will also serve this development, ensuring efficient network integration.

By utilising available service infrastructure and aligning with approved municipal planning frameworks, the project supports resource efficiency, cost effectiveness, and sustainable urban growth. The compact layout, walkable street design, and proximity to existing public transport routes further reduce reliance on private vehicles and promote energy and water efficiency through shorter service runs, reduced pumping requirements, and inclusion of low flow water fittings and LED public lighting. Collectively, these measures ensure that the development optimises existing resources, limits additional infrastructure demand, and contributes to a more sustainable and resilient urban system.

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

Service confirmations have been attached under Appendix E16.

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

The proposed mixed-use residential development on Remainder Farm 1388, Kuils River responds directly to the pressing need for well located, serviced, and affordable housing within the City of Cape Town's northern growth corridor. The project provides an opportunity to deliver approximately 486 residential units (comprising single residential, general residential, and

supporting business uses) on vacant, underutilised land that lies within the established urban edge and adjacent to existing infrastructure networks. The need is further supported by the City's Integrated Development Plan (IDP) and Human Settlements Framework, which identify a significant backlog of affordable housing in the Kuils River/Belhar/Wesbank area and emphasise the redevelopment of strategically located infill sites to promote inclusion and accessibility.

From a desirability perspective, the site is ideally positioned in proximity to public transport routes (Reuter Street, Old Nooiensfontein Road, and the R300), educational institutions, and existing community amenities. The development will contribute to the creation of a more integrated and compact urban form, in line with national and provincial spatial planning objectives. By making use of existing municipal service infrastructure including confirmed connections for water, sanitation, electricity, and stormwater the project ensures efficient use of public resources and minimises the need for costly offsite expansions.

Environmentally, the proposal is desirable because it focuses growth on already transformed land, thereby avoiding the loss of intact biodiversity or high value agricultural land. The design incorporates setbacks from the Kuils River floodline, stormwater attenuation ponds, and Water Sensitive Urban Design (WSUD) features to protect downstream water quality and maintain ecosystem function. These measures ensure compliance with the principles of sustainable development contained in Section 2 of NEMA and promote long term climate resilience.

Socio economically, the project will generate local employment during construction, stimulate small business opportunities through the inclusion of a local business erf, and provide secure, serviced housing opportunities that improve quality of life for local residents. The proposal therefore addresses both the social need for equitable urban access and the environmental imperative for sustainable infill growth, representing the Best Practicable Environmental Option (BPEO) for the site.

SECTION F: PUBLIC PARTICIPATION

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

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

N/A

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

A Public Participation Process will be conducted notifying Potential and Registered I&APs of the opportunity to (i) register as an I&AP, and (ii) the availability of the Pre-Application DBAR for comment. A comment period of a minimum of 30 days will be given to Potential and Registered I&APs. Comments received during the Pre-Application PPP will be recorded and addressed in a Comments and Response Report. The PPP will be conducted in accordance with the approved PPP and Chapter 6 of the 2014 NEMA EIA Regulations, as amended. All PPP proof will be attached as **Appendix F** in the Post-Application BAR and Final BAR.

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

Property	Name And Surname	Email
Bet-El Primary School		moeketsi.tsoaeli@gmail.com
Name Of Organization	**Name And Surname**	**Email**
Eskom	John Geeringh W.M. Hennin R.P. Ranweda Western Cape	GeerinJH@eskom.co.za HenninWM@eskom.co.za RanwedRP@eskom.co.za WesternCape@eskom.co.za
Cape Nature	Ismat Adams M. Wheeler	IAdams@capenature.co.za MWheeler@capenature.co.za
Heritage Western Cape	Waseefa Dhansay	Waseefa.Dhansay@westerncape.gov.za hwc.hwc@westerncape.gov.za ceoheritage@westerncape.gov.za
City of Cape Town – Housing Demand		housing.db@capetown.gov.za
City of Cape Town – Public Housing Department		MyEstate@capetown.gov.za
City of Cape Town – Development Management		Northern.hub@capetown.gov.za
City of Cape Town – Environmental Resource Management		enviro@capetown.gov.za
City of Cape Town – Environmental & Heritage Management	Sonja Warnich-Stemmet	sonja.warnichstemmet@capetown.gov.za
City of Cape Town – City Health Department	Paul Nkurunziza	paul.nkurunziza@capetown.gov.za
City of Cape Town – Environmental Health (Air Quality)	Ian Gildenhuys	ian.gildenhuys@capetown.gov.za
City of Cape Town - General		contact.us@capetown.gov.za
Department of Water Affairs and Sanitation	Warren Dreyer Derril Daniels M. Noqhamza R. Singo	dreyerw@dwa.gov.za danielsd@dwa.gov.za noqhamzam@dws.gov.za SingoR@dws.gov.za
Department of Environmental Affairs and Development Planning: Waste Management	Saliem Haider	Saliem.Haider@westerncape.gov.za
Department of Environmental Affairs and Development Planning: Pollution and Chemicals Management	Annelize De Villiers	Annelize.DeVilliers@westerncape.gov.za
Western Cape Government: Air Quality Management	Johan Oelofse	Johan.Oelofse@westerncape.gov.za

Western Cape Government: Agriculture	Mary James	Mary.James@westerncape.gov.za
Western Cape Government: Infrastructure		service@westerncape.gov.za

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

N/A

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

N/A. The Pre-Application Draft Basic Assessment Report (this report) is currently being distributed for public participation. Once the Pre-Application Draft BAR has been circulated for public participation, all the comments received during the 30-day PPP on the Pre-Application Draft BAR will be summarised and attached to the Post-Application Draft BAR for Review. A Comments and Response Report will be attached to the Post-Application Draft BAR as **Appendix F**.

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

N/A. The Pre-Application Draft Basic Assessment Report (this report) is currently being distributed for public participation. Once the Pre-Application Draft BAR has been circulated for public participation, all the comments received during the 30-day PPP on the Pre-Application Draft BAR will be summarised and attached to the Post-Application Draft BAR for Review. A Comments and Response Report will be attached to the Post-Application Draft BAR as **Appendix F**.

Note:

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

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

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

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

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

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

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

- a copy of the newspaper advertisement ("newspaper clipping") that was placed, indicating the name of the newspaper and date of publication (of such quality that the wording in the advertisement is legible).

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. Groundwater

1.1.	Was a specialist study conducted?	~~YES~~	NO
1.2.	Provide the name and or company who conducted the specialist study.		
N/A			
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
According to the Department of Water and Sanitation's (DWS) National Groundwater Archive and the Hydrogeological Map of South Africa, the site is situated above a secondary, intergranular and fractured aquifer system associated with the Malmsbury Group. Groundwater yields in this region are typically low to moderate and are not a significant water supply source. The aquifer is considered vulnerable to surface contamination, which influenced the inclusion of stormwater quality management measures, lined attenuation ponds, and controlled runoff systems in the design to prevent infiltration of contaminated stormwater into the subsurface environment.			
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.		
Regional borehole data and local geotechnical indications suggest groundwater occurs at an approximate depth of 6–10 metres below ground level. The relatively deep-water table and the sandy–clay soil profile reduce the risk of direct groundwater interaction with construction activities. Nevertheless, no soakaways or infiltration basins are proposed within the high-risk eastern buffer zone near the Kuils River. Instead, stormwater will be managed through detention and controlled discharge systems to maintain groundwater protection and ensure compliance with the National Water Act's duty of care provisions.			

2. Surface water

2.1.	Was a specialist study conducted?	YES	~~NO~~
2.2.	Provide the name and/or company who conducted the specialist study.		
The Biodiversity Company – Aquatic Biodiversity Assessment & Floodline Delineation E2C Consulting Engineers – Floodline Assessment			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		
Two floodline delineation studies were undertaken to inform the proposed development. The first, prepared by The Biodiversity Company (2025), was based on 5-metre topographical data and online modelling software, providing an indicative 1:100-year floodline for environmental screening purposes. The study determined that approximately 40% of the site falls within the modelled floodplain and recommended maintaining this as a no-go area to protect the Kuils River and associated riparian habitat. A subsequent and more detailed Engineering Floodline Assessment (E2C Consulting Engineers, 2025) was undertaken using survey-verified topographical data and hydraulic modelling, providing a refined and more accurate representation of the flood extent. The engineering floodline delineation confirms the extent of the 1:100-year floodplain and has been used to guide the final layout design, ensuring that all development remains outside the flood-affected area. The engineering floodline			

is therefore regarded as the definitive hydrological reference for the project, while the TBC study supports the environmental context and screening process.

3. Coastal Environment

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

4. Biodiversity

4.1.	Were specialist studies conducted?	YES	~~NO~~
4.2.	Provide the name and/or company who conducted the specialist studies.		
The Biodiversity Company – Terrestrial Compliance Statement & Aquatic Impact Assessment			
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		
The specialists referenced the National Vegetation Map (Mucina & Rutherford 2018), the National Spatial Biodiversity Assessment (NSBA), the National Freshwater Ecosystem Priority Areas (NFEPA) dataset, and the Western Cape Biodiversity Spatial Plan (WCBSP 2017). These datasets confirmed that the site's terrestrial component is classified as transformed habitat with no remnant indigenous vegetation, whereas the Kuils River along the eastern boundary constitutes a Very High aquatic sensitivity area. This information directly influenced the placement of the developable footprint away from the riparian corridor and informed the inclusion of stormwater attenuation and rehabilitation areas within the layout.			
4.4.	Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.		
The WCBSP's objectives of avoiding loss of CBAs, protecting aquatic corridors, and integrating ecological infrastructure into urban form were applied throughout the design process. The development footprint was confined to the transformed, low sensitivity western portion of the property, while the eastern flood prone area was retained as a no build buffer zone along the Kuils River. This buffer will be rehabilitated through alien vegetation removal, indigenous replanting, and stormwater quality improvements, ensuring compliance with the WCBSP's management guidelines.			
4.5.	Explain what impact the proposed development will have on the site-specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development.		
The site does not overlap any Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs). Consequently, the development will not result in the loss of mapped biodiversity features. Instead, the project is expected to enhance local ecological function through rehabilitation of the riparian corridor, restoration of stormwater connectivity, and creation of functional open space linkages that support ecosystem services such as flood attenuation and water quality improvement.			
4.6.	If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.		
N/A			
4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.		

Due to the highly disturbed and urbanised condition of the terrestrial environment, no significant faunal habitats remain within the developable footprint. Common urban tolerant species such as birds, rodents, and reptiles may occur, while the Kuils River corridor provides habitat for aquatic macroinvertebrates and water dependent fauna. The development avoids direct encroachment into these habitats, and the proposed riparian buffer and rehabilitation measures will preserve faunal movement corridors along the river. Construction phase controls, including faunal rescue, limited lighting, and fencing protocols, will be implemented to minimise disturbance.

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.
The site is located on the western bank of the Kuils River within a gently undulating landscape that slopes gradually from west to east toward the river. The topography, averaging a gentle gradient of 1:40, and the site's position within a low-lying floodplain transition area have directly influenced the development layout. The 1:100-year floodline, as delineated by the Engineering Floodline Assessment (2025), was used to establish the eastern boundary of the developable area, ensuring that permanent structures are confined to elevated, geotechnically stable land. No significant ridges, escarpments, or geological constraints occur within the property, and soils are classified as sandy loams with moderate infiltration capacity. These conditions support conventional foundation and service installation methods. As a result, the project design respects the site's natural form, utilising the flatter terrain for development and retaining the flood prone and riparian zones as open space and stormwater management areas, thereby minimising landscape alteration and ensuring long term stability.

6. Heritage Resources

6.1.	Was a specialist study conducted?	YES	~~NO~~
6.2.	Provide the name and/or company who conducted the specialist study.		
Jonathan Kaplan – NID to HWC			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
Heritage Western Cape confirmed that no further studies were required.			

7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.
N/A. No culturally or historically significant elements as defined in Section 2 of the National Heritage Resources Act (Act 25 of 1999) were identified within the boundaries of Farm 1388, Kuils River. The site is largely transformed through past agricultural and urban activities, with no evidence of heritage structures, archaeological sites, burial grounds, or cultural landscapes of significance. The surrounding area is characterised by modern residential and institutional development, including the Bet-El Primary School, which holds no formal heritage status. As part of the environmental screening and site verification process, the Heritage Screening Tool did not flag any areas of medium or high heritage sensitivity. Given this context, the proposed development will not impact any known heritage or cultural resources, and a chance find procedure will be implemented during construction to ensure that any unforeseen archaeological or cultural materials are appropriately managed in accordance with Section 35 of the NHRA.

8. Socio/Economic Aspects

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

According to the 2011 Census Suburb Profile for Kuils River (City of Cape Town, 2013), the area had a population of approximately 69 515 people and 19 053 households, with an average household size of 3.65 persons. The population is predominantly Coloured (58%), followed by White (20%) and Black African (19%) residents. Education levels are relatively high, with 61% of adults aged 20 years and older having completed Grade 12 or higher. The local economy is stable, 87% of the labour force is employed, and the unemployment rate is approximately 12.6%, indicating a strong labour absorption rate within the working age population. The majority of households (92%) live in formal dwellings, and service delivery is well established, with 99% of households having access to piped water, flush toilets connected to the sewer system, and weekly refuse removal.

Economically, income levels are mixed, with approximately 27% of households earning R3 200 or less per month, reflecting a significant demand for affordable housing options. The community is therefore characterised by a diverse and moderately dense urban environment with well-developed services but persistent socio-economic inequalities, reinforcing the need for integrated, accessible housing opportunities such as those proposed on Farm 1388, Kuils River.

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

The proposed mixed-use residential development on Farm 1388, Kuils River will deliver significant local and regional socio-economic benefits. The project will create an estimated 486 housing opportunities, addressing the high demand for affordable, well located residential units within the City of Cape Town's northern growth corridor. This directly supports the City's Integrated Development Plan (IDP) objective of reducing the housing backlog and promoting spatial equity through infill development. During the construction phase, the project will generate short to medium term employment opportunities, particularly for semi-skilled and unskilled labour drawn from nearby communities such as Belhar, Wesbank, and Sarepta. Ancillary benefits will extend to local suppliers, small contractors, and transport services, stimulating local economic activity.

In the operational phase, the development will contribute to a diversified local economy through the inclusion of a General Business erf, which will accommodate small scale retail, convenience, and service-based enterprises. The expanded residential base will also support the sustainability of nearby schools, healthcare facilities, and public transport systems. Over the long term, the project will enhance social stability, access to amenities, and household asset ownership, improving quality of life and promoting inclusive urban growth within an existing serviced area. Consequently, the development represents a strategically beneficial investment that aligns with municipal and provincial socio-economic development goals while contributing to employment creation and sustainable human settlement formation.

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

The applicant, Azalea Ventures (Pty) Ltd, is committed to implementing a range of social development and upliftment initiatives in partnership with the City of Cape Town and local community stakeholders. During the construction phase, priority will be given to the employment of local labour and procurement from small, medium, and micro enterprises (SMMEs) based within nearby communities such as Belhar, Wesbank, Sarepta, and Kuils River. Training and skills transfer programmes will be integrated into site operations to build capacity in trades such as bricklaying, plumbing, and landscaping.

The development design also incorporates community supportive infrastructure, including a crèche site, public open spaces, and safe pedestrian walkways that promote accessibility and social cohesion. Landscaping within the riparian buffer will be used as a rehabilitation and environmental education opportunity, engaging local residents in maintenance and greening programmes. In the long term, the inclusion of a General Business erf will create opportunities for local entrepreneurship and provide essential goods and services within walking distance of the residential area. Collectively, these initiatives are aimed at

improving livelihoods, enhancing neighbourhood safety and quality of life, and ensuring that the project contributes meaningfully to the social and economic upliftment of the broader Kuils River community.

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

The proposed development is not expected to negatively impact human health or well-being, as it is located within an already urbanised environment with existing residential, institutional, and transport infrastructure. The design has been informed by environmental and social considerations to ensure that potential nuisances such as noise, dust, and visual disturbance are effectively managed during construction through standard mitigation measures outlined in the Environmental Management Programme (EMPr). These include dust suppression, limited working hours, controlled access, and noise management protocols.

In terms of the operational phase, the project will improve overall community well-being by providing safe, serviced, and affordable housing opportunities in close proximity to schools, public transport routes, and employment areas. The layout promotes walkability, connectivity, and public safety through the inclusion of sidewalks, street lighting, and landscaped open spaces. Visual integration has been achieved by maintaining natural buffers along the Kuils River and ensuring the built form complements the surrounding urban character. No activities associated with the development will produce odours, emissions, or other pollutants that could affect air quality or public health.

Overall, the development is expected to have a positive influence on residents' health, safety, and sense of place by transforming vacant land into a well-planned, inclusive, and aesthetically coherent neighbourhood that enhances both the physical and social environment of Kuils River.

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. Details of the alternatives identified and considered

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

Provide a description of the preferred property and site alternative.

The preferred property comprises Remainder Farm 1388, Kuils River, located along the western bank of the Kuils River within the City of Cape Town municipal area. The developable extent of approximately 12.15 ha will accommodate a mixed-use residential neighbourhood consisting of single residential erven, two general residential sites, one general business erf, and supporting open space and service infrastructure. The site was selected due to its strategic location within the existing urban edge, proximity to Belhar, Wesbank, and Old Nooiensfontein Road, and availability of bulk municipal services.

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

No viable alternative properties were available to the applicant. The landholding on Farm 1388 is owned and controlled by Azalea Ventures (Pty) Ltd, and the project intent was to develop this specific parcel of land. As such, no alternative sites were formally identified or assessed.

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

Farm 1388 was identified as the preferred and only feasible site because it is already transformed, well located within the urban fabric, and adjacent to existing services and transport routes. Environmental constraints were assessed through the Site Sensitivity Verification Report (SSVR) and Floodline Delineation Study (The Engineering Floodline Assessment (2025)). These studies guided the developable footprint to exclude the 1:100-year floodline and high aquatic sensitivity areas, ensuring compliance with

environmental and spatial planning principles. The outcome of the internal site selection process confirmed that this location presents the best practicable environmental option (BPEO) for meeting local housing demand while minimising ecological disturbance.

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

Within Farm 1388, several internal layout configurations were tested to optimise density, road access, and environmental protection. The final layout was determined through an iterative design process between the environmental, engineering, and planning teams. The process prioritised:

- Avoidance of the flood prone eastern portion of the site.
- Retention of a buffer along the Kuils River for stormwater management and ecological rehabilitation.
- Alignment of access via Reuter Street extension and secondary access from Old Nooiensfontein Road; and
- Efficient use of the flat, developable western section of the property for residential erven.

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

No alternative properties were considered, as Farm 1388 is the only land parcel owned by the applicant and available for the proposed development. The project objective is to unlock the potential of this specific site for housing delivery within an existing serviced area. Environmental and engineering assessments demonstrated that, with appropriate mitigation and layout refinement, the site is suitable for development without unacceptable environmental impacts.

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

Positive impacts: Optimises use of vacant land within the urban edge; supports local economic development and job creation; improves access to affordable housing; enhances local service efficiency; and avoids loss of undisturbed biodiversity by developing a transformed area.

Negative impacts: Temporary construction related impacts (dust, noise, traffic, and visual disturbance) and partial alteration of the local landscape character adjacent to the Kuils River. These are considered manageable through EMPr mitigation and the retention of a riparian buffer.

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

Provide a description of the preferred activity alternative.

The preferred activity involves the establishment of a mixed-use residential development comprising approximately 436 Single Residential erven, two General Residential sites (yielding ±50 units), one General Business erf, and associated infrastructure, stormwater management systems, and public open spaces. The activity includes bulk service connections, internal roads, landscaping, and rehabilitation of the riparian buffer zone adjacent to the Kuils River. This alternative supports sustainable urban infill within the existing municipal service network.

Provide a description of any other activity alternatives investigated.

No materially different activity alternatives were investigated. The applicant's intention from project inception was to pursue residential development aligned with municipal spatial planning objectives and the property's location within the urban edge. Commercial, industrial, or agricultural alternatives were considered incompatible with surrounding land uses, the existing school, and local infrastructure capacity.

Provide a motivation for the preferred activity alternative.

The preferred activity was selected as it provides the most appropriate and sustainable use of the property given its urban context, accessibility, and service availability. Residential development responds directly to the City of Cape Town's housing demand and supports socio-economic upliftment through local job creation and provision of mixed income housing. Environmentally, the activity is compatible with the site's transformed condition and avoids the 1:100-year floodline and high sensitivity aquatic areas identified by the Engineering Floodline Assessment (2025).

Provide a detailed motivation if no activity alternatives exist.

No alternative activities were pursued because the primary objective of the applicant, Azalea Ventures (Pty) Ltd, is to develop the land for residential purposes in support of local housing needs. The property's size, location, and zoning potential make it unsuitable for intensive commercial or industrial activities, while agricultural reuse is not viable due to the fragmented and urbanised surroundings. As such, the proposed residential development represents the only reasonable and feasible activity consistent with municipal planning and environmental frameworks.

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

Positive impacts: Provision of affordable and diverse housing opportunities; creation of employment and business opportunities during construction and operation; stimulation of the local economy; efficient use of existing municipal services; and improvement of local infrastructure and public open space.

Negative impacts: Temporary construction phase disturbances including noise, dust, and traffic; potential loss of remaining ruderal vegetation; and localised visual alteration adjacent to the Kuils River. These impacts are short term, localised, and can be effectively mitigated through implementation of the Environmental Management Programme (EMPr) and stormwater quality control measures.

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

Provide a description of the preferred design or layout alternative.

The preferred layout comprises a compact, mixed-use residential design situated on the western portion of Farm 1388, Kuils River, covering an area of approximately 12.15 hectares. The layout accommodates 436 Single Residential erven, two General Residential sites, one General Business erf, and associated public roads, open spaces, and stormwater management infrastructure. The design maintains a conservative buffer along the Kuils River floodline, as delineated by the Engineering Floodline Assessment (2025), ensuring that no permanent structures are positioned within the 1:100-year flood extent. The layout promotes walkability, accessibility, and integration with adjacent urban areas through primary access from Reuter Street and secondary access from Old Nooiensfontein Road.

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

Several internal configurations were explored during the concept planning phase to determine the optimal development footprint. Early layouts extended closer to the Kuils River, but these were discarded after the floodline delineation and aquatic sensitivity results indicated the need for an increased setback and stormwater attenuation zone. Minor variations were also assessed regarding road alignment, open space placement, and residential density; however, the adopted layout was refined to balance environmental constraints with engineering feasibility and municipal design standards.

Provide a motivation for the preferred design or layout alternative.

The selected layout was chosen because it maximises developable area while fully avoiding the floodplain and high sensitivity aquatic zones. It aligns with the City of Cape Town's urban design and infrastructure guidelines by incorporating a hierarchical road network, public open space system, and mixed-use land use pattern that supports long term sustainability. The design facilitates efficient municipal servicing, improves connectivity to adjacent neighbourhoods, and provides opportunities for community interaction through shared green spaces.

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

While multiple preliminary configurations were considered, they represented variations of the same development concept rather than distinct alternatives. The preferred layout evolved through an iterative refinement process involving the civil engineers, environmental practitioners, and the applicant to ensure compliance with environmental constraints and service requirements. Consequently, the final design reflects the only feasible and environmentally acceptable layout that meets the project's objectives and regulatory standards.

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

Positive impacts: Avoidance of flood prone areas and maintenance of a riparian buffer; improved stormwater management through attenuation ponds and vegetated swales; efficient internal circulation and infrastructure layout; creation of accessible open spaces and community amenities; and enhancement of urban integration and local safety.

Negative impacts: Temporary disturbance during earthworks and construction, limited loss of transformed vegetation, and potential increase in impervious surface area. These impacts are localised, short term, and can be mitigated through the implementation of the Environmental Management Programme (EMPr) and low impact stormwater systems.

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

Provide a description of the preferred technology alternative:

The preferred technology approach for the proposed development focuses on resource efficient urban design and infrastructure systems that minimise environmental impact and promote long term sustainability. Key technologies include Water Sensitive Urban Design (WSUD) measures such as detention ponds, vegetated swales, and litter traps to manage stormwater quantity and quality; energy efficient LED street lighting; and the integration of low flow water fittings and solar ready electrical connections within residential units. Municipal services will be provided via underground water, sewer, and electrical reticulation networks, ensuring reliability, reduced visual intrusion, and ease of maintenance.

Provide a description of any other technology alternatives investigated.

Alternative stormwater management technologies were considered, including the use of infiltration basins and soakaway systems; however, these were discarded due to the relatively shallow clay sub layers and fluctuating groundwater levels identified in site investigations, which limit infiltration potential. The option of using off grid renewable energy systems for the entire development was also assessed but deemed economically unfeasible for a predominantly affordable housing project. Instead, the layout provides for future retrofit opportunities for individual solar installations as costs decrease.

Provide a motivation for the preferred technology alternative.

The selected technologies were chosen to optimise resource efficiency and reduce operating costs while remaining technically viable and consistent with City of Cape Town design standards. The WSUD system enhances resilience to climate variability by controlling peak flows and improving water quality prior to discharge into the Kuils River. Energy efficient infrastructure and water

saving fixtures lower household utility demand and reduce the municipality's long term servicing burden. Collectively, these technologies align with the principles of the National Environmental Management Act (NEMA) and the Western Cape Climate Change Response Strategy, promoting sustainable resource use within urban developments.

Provide a detailed motivation if no alternatives exist.

Although no wholly alternative technologies were feasible due to engineering and cost limitations, the chosen suite of technologies reflects the best practicable combination of sustainability measures for this development type. The approach balances affordability with measurable environmental performance and is compatible with municipal maintenance frameworks.

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

Positive impacts: Reduced stormwater pollution and downstream flooding; improved water use efficiency; lower energy consumption and greenhouse gas emissions; decreased long term operational costs for residents; and enhanced resilience to climate related risks.

Negative impacts: Slightly higher initial construction costs for WSUD features and energy efficient fittings; potential short term maintenance requirements for vegetated systems during establishment. These are minor and outweighed by long term environmental and economic benefits.

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

Provide a description of the preferred operational alternative.

The preferred operational alternative entails the ongoing use of the development as a mixed-use residential neighbourhood incorporating single and general residential erven, a local business node, and associated municipal infrastructure. The operational phase will rely on City of Cape Town managed water, sewer, and electricity networks, with onsite stormwater attenuation ponds and vegetated swales maintained as part of the public open space system. Operations will include routine municipal servicing, landscaping maintenance, waste collection, and management of stormwater infrastructure in accordance with the Environmental Management Programme (EMPr).

Provide a description of any other operational alternatives investigated.

No alternative operational modes were formally investigated. The operational regime must align with the City's standard infrastructure management framework and applicable by-laws for residential developments. Consideration was given to private maintenance of internal services or off grid servicing systems (e.g., package wastewater treatment plants or independent solar networks); however, these were ruled out due to long term cost, maintenance complexity, and regulatory requirements for municipal oversight.

Provide a motivation for the preferred operational alternative.

The preferred operational alternative ensures efficient and sustainable functioning of the development under the City's existing municipal management systems. This model provides reliable service delivery, equitable cost recovery, and compliance with statutory requirements under the Municipal Systems Act and NEMA duty of care provisions. By integrating stormwater and landscaping functions within public open spaces, the operational model also maintains ecological and social benefits without imposing undue maintenance burdens on residents or the municipality.

Provide a detailed motivation if no alternatives exist.

No other viable operational alternatives exist, as independent servicing or privately managed utility systems would be inconsistent with municipal planning approvals and long-term sustainability objectives. The development is designed to be fully integrated into existing municipal networks, ensuring continuity of service, proper billing, and adherence to City approved standards.

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

Positive impacts: Reliable municipal service provision; long term sustainability and cost efficiency; improved stormwater and waste management systems; enhanced quality of life for residents; and ongoing maintenance of open spaces and riparian buffers that protect ecological integrity.

Negative impacts: Routine operational activities may result in minor increases in solid waste generation, traffic volumes, and water energy demand. These are considered negligible and manageable through responsible waste management practices, energy efficient infrastructure, and community awareness programmes outlined in the EMPr.

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

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

The No-Go Alternative, which entails maintaining the site in its current undeveloped state, is not preferred as it would fail to address the pressing housing and socio-economic needs identified in the City of Cape Town's Integrated Development Plan (IDP) and Municipal Spatial Development Framework (MSDF). The property is currently a vacant and underutilised parcel of land located within the urban edge, surrounded by established residential areas and serviced by existing municipal infrastructure. Retaining the land in its present condition would result in the continued underutilisation of strategically located urban land, offering no contribution to local employment creation, service optimisation, or spatial integration.

From an environmental perspective, the "No-Go" option would also not yield a meaningful ecological benefit, as the site's terrestrial environment is already highly transformed and degraded with limited biodiversity value. Conversely, the proposed development includes rehabilitation and active management of the Kuils River riparian corridor, which would enhance ecological functioning and stormwater quality. Therefore, the proposed development alternative is considered the Best Practicable Environmental Option (BPEO) as it balances social, economic, and environmental sustainability objectives, while the "No-Go" alternative would perpetuate the status quo and limit socio-economic advancement within the Kuils River area.

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

Beyond the design, layout, and technology refinements already incorporated into the proposal, no other reasonable or feasible alternatives were identified that could further reduce negative impacts or enhance positive outcomes. The site selection was constrained by land ownership and planning context, as Farm 1388 is the only property available to the applicant. During the design phase, several internal layout adjustments were made to avoid the 1:100-year floodline, maintain a riparian buffer, and improve stormwater attenuation and pedestrian connectivity, thereby mitigating unavoidable impacts on the natural environment.

Environmental sensitivities, infrastructure constraints, and municipal planning standards have been fully integrated into the current proposal, resulting in an optimised layout that avoids significant impacts and maximises social and economic benefits. Given the transformed condition of the site, proximity to existing services, and the limited extent of ecological features, no other alternatives would provide a better environmental or socio-economic outcome. The proposed mixed-use residential development is therefore considered the Best Practicable Environmental Option (BPEO), balancing housing delivery needs with sustainable land use planning and environmental protection.

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

The preferred alternative is the establishment of a mixed-use residential development on Remainder Farm 1388, Kuils River, located along the western bank of the Kuils River within the City of Cape Town municipal area. This site represents the only viable and available property under the ownership of the applicant, Azalea Ventures (Pty) Ltd, and is situated within the designated urban edge where full municipal service infrastructure is available. The preferred layout confines development to the western portion of the site, outside the 1:100-year floodline, and incorporates a conservation and stormwater management buffer along the river.

No reasonable or feasible alternative properties, activities, or layouts were identified that would provide a superior environmental or socio-economic outcome. The proposed design maximises the use of already transformed land, ensures protection of sensitive aquatic areas, and delivers affordable, well-located housing in support of the City's spatial and human settlement objectives. Accordingly, the preferred site and development configuration are considered the Best Practicable Environmental Option (BPEO), achieving a balanced outcome between environmental protection, infrastructure efficiency, and community upliftment.

2. "No-Go" areas

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

The primary "no-go" area identified within the site corresponds to the flood prone eastern portion of Remainder Farm 1388, which lies within the delineated 1:100-year floodline of the Kuils River as determined by the Engineering Floodline Assessment (2025). This area includes the riparian corridor, low lying wetland features, and stormwater attenuation zones that form part of the river's natural floodplain. To ensure protection of the aquatic ecosystem and compliance with the National Water Act (1998), no permanent structures, hard surfacing, or bulk infrastructure will be permitted within this zone. Instead, it will be retained as open space and a stormwater management buffer, incorporating indigenous rehabilitation planting and WSUD features.

The approximate central coordinates of the no-go area are:

- **Latitude: 34° 0' 35.00" S**
- **Longitude: 18° 41' 40.00" E**

This area extends along the eastern boundary of the property, parallel to the Kuils River, and will remain undeveloped except for approved stormwater and environmental management interventions. The identification of this no-go zone guided the preferred layout, ensuring that all residential and business erven are situated outside the 1:100-year flood extent and on geotechnically stable ground.

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

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

This Basic Assessment was undertaken in accordance with the principles of Integrated Environmental Management as detailed in Section 23 of NEMA and in the NEMA EIA Regulations.

The impact assessment is aimed at determining the likely significance of any impacts (positive or negative) associated with the development. The significance of the impacts is determined by investigating certain key aspects, or parameters, of the potential impact, which are determined by the nature of the activity, as well as the nature of the receiving environment. Aspects investigated include the extent, duration and timing, and magnitude of the impact.

Table 1 below provides an explanation of the parameters used to determine the significance of an impact, as well as what "significance" means in the context of this impact assessment.

Other factors which are also considered in the assessment of impacts include whether the impact is direct, indirect or cumulative. A direct impact can be explained as being a direct result of activities associated with the development, such as the contamination of land by spillage from pumps.

An indirect impact would be a downstream, secondary or "knock-on" impact resulting from an impact directly associated with the development (such as negative impacts associated with the stream off the site)

A cumulative impact would be an impact which already occurs in the receiving environment associated with other activities taking place in proximity to the development, such as polluted stormwater and runoff from existing road surfaces.

Other factors considered include whether the impact is reversible; and whether the impact could cause an irreplaceable loss of resources.

The impact assessment methodology used has been closely guided by the DEAT EIA Guideline Document 5, on the assessment of impacts and alternatives (DEAT 2006); as well as reference to the description of the criteria used for the assessment of impacts as contained in the DEA&DP Specialist Guidelines Series (2005).

The assessment of the potential impacts has been based on SEC's extensive experience related to environmental impact assessment as well as specialist assessment and input, where applicable.

The impact assessment has also been informed by input and comment from stakeholders. The potential impacts have been assessed after review by the professional team, including specialists, and based on professional judgement.

It must be noted that determining the significance of impacts, although carefully and systematically considered, remains a subjective judgement, as there are no truly objective measures that can be used to judge significance

Practicable mitigation measures (where warranted) have been identified to minimize the potential impacts associated with the retirement development proposal. The significance of any potential impact before and after mitigation is also provided to give an indication of the efficacy of the proposed mitigation measures.

Table 1: Parameters used to Establish Impact Significance

ITEM	DEFINITION
EXTENT	
Local	Extending only as far as the boundaries of the activity, limited to the site and its immediate surroundings
Regional	Impact on the broader region
National	Will have an impact on a national scale or across international borders
DURATION	
Short-term	0-5 years
Medium-Term	5-15 years
Long-Term	>15 years, where the impact will cease after the operational life of the activity

Permanent	Where mitigation, either by natural process or human intervention, will not occur in such a way or in such a time span that the impact can be considered transient.
MAGNITUDE OR INTENSITY	
Low	Where the receiving natural, cultural or social function/environment is negligibly affected or where the impact is so low that remedial action is not required.
Medium	Where the affected environment is altered, but not severely and the impact can be mitigated successfully and natural, cultural or social functions and processes can continue, albeit in a modified way.
High	Where natural, cultural or social functions or processes are substantially altered to a very large degree. If a negative impact, then this could lead to unacceptable consequences for the cultural and/or social functions and/or irreplaceable loss of biodiversity to the extent that natural, cultural or social functions could temporarily or permanently cease.
PROBABILITY	
Improbable	Where the possibility of the impact materialising is very low, either because of design or historic experience
Probable	Where there is a distinct possibility that the impact will occur
Highly Probable	Where it is most likely that the impact will occur
Definite	Where the impact will undoubtedly occur, regardless of any prevention measures
SIGNIFICANCE	
Low	Where a potential impact will have a negligible effect on natural, cultural or social environments and the effect on the decision is negligible. This will not require special design considerations for the project
Medium	Where it would have, or there would be a moderate risk to natural, cultural or social environments and should influence the decision. The project will require modification or mitigation measures to be included in the design
High	Where it would have, or there would be a high risk to natural, cultural or social environments. These impacts should have a major influence on decision making.
Very High	Where it would have, or there would be a high risk of, an irreversible negative impact on biodiversity and irreplaceable loss of natural capital that could result in the project being environmentally unacceptable, even with mitigation. Alternatively, it could lead to a major positive effect. Impacts of this nature must be a central factor in decision making.
STATUS OF IMPACT	
Whether the impact is positive (a benefit), negative (a cost) or neutral (status quo maintained)	
DEGREE OF CONFIDENCE IN PREDICTIONS	
The degree of confidence in the predictions is based on the availability of information and specialist knowledge (e.g. low, medium or high)	
MITIGATION	
Mechanisms used to control, minimise and or eliminate negative impacts on the environment and to enhance project benefits. Mitigation measures should be considered in terms of the following hierarchy: (1) avoidance, (2) minimisation, (3) restoration and (4) off-sets.	

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

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

Note: All alternatives involving development (mixed-use, residential only, or commercial only) would result in the permanent transformation of previously cultivated land, the loss of rural landscape character, and the introduction of hard surfaces, leading to similar pressures on stormwater management, water quality, and ecological buffers. In addition, each alternative would generate increased traffic volumes, add to visual intrusion along scenic routes, and place demands on municipal bulk services. These impacts are not unique to one option and cannot be described as inherently "better" or "worse" between the alternatives, as they stem primarily from the act of development on the site itself. Instead, they represent a shared set of cumulative impacts and risks that must be addressed through the Environmental Management Programme (EMPr) and specialist recommended mitigation measures. The table below represents the potential impact and risk of the common alternative which is the permanent transformation of the Erf in question.

CONSTRUCTION PHASE	
Potential impact and risk:	**Noise:** The potential noise impacts associated with the nature of activities of a construction site require that noise impact mitigation measures are considered and implemented where required.
Nature of impact:	**Negative**
Extent and duration of impact:	**Site Specific: Short Term**
Consequence of impact or risk:	**Nuisance to surrounding residence**
Probability of occurrence:	**Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resource**
Degree to which the impact can be reversed:	**Completely reversible**
Indirect impacts:	**Nuisance impacts to surrounding neighbours**
Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low to Medium**
Degree to which the impact can be avoided:	**Can be avoided**
Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be mitigated**
Proposed mitigation:	**<u>Noise Mitigation:</u>** • A complaints register must be opened. • Excavations and earth moving activities should be restricted to normal construction working hours (7:30 – 17:30) as far as possible. • Vehicles and equipment should be kept in good working condition. If deemed necessary, machinery and equipment should be fitted with mufflers/ exhaust silencers. No unnecessary disturbances should be allowed to emanate from the construction site. • Noise levels must comply with the relevant health & safety regulations and SANS codes and should be monitored by the Health & Safety Officer as necessary and appropriate. • The appointed ECO must undertake regular site inspections for the duration of the construction phase, and produce regular ECO monitoring audit reports, auditing the compliance of the property developer with the conditions of the Environmental Authorisation and the approved EMP.
Residual impacts:	**None**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Potential impact and risk:	**Dust:** The potential dust impacts associated with the nature of activities of a construction site require that dust impact mitigation measures are considered and implemented where required.
Nature of impact:	**Negative**
Extent and duration of impact:	**Site Specific: Short Term**
Consequence of impact or risk:	**Nuisance to surrounding residence**

Probability of occurrence:	**Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resource**
Degree to which the impact can be reversed:	**N/A**
Indirect impacts:	**Nuisance impacts to surrounding neighbours**
Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low to Medium**
Degree to which the impact can be avoided:	**Can be avoided**
Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be mitigated**
Proposed mitigation:	**<u>Dust Mitigation:</u>** • If dust issues occur, dust can be suppressed on access roads and the construction site during dry periods by the regular application of non-potable water or a biodegradable soil stabilisation agent. Under no circumstances should potable water be used for dust suppression. Potable water should not be used for anything other than drinking. • Dust suppression measures such as the wetting down of sand heaps as well as exposed areas around the site must be implemented especially on windy days. • The use of straw worked into the sandy areas may also help and the ECO must advise when this is necessary. • If dust appears to be a continuous problem, shade cloth can be used to cover open areas where necessary or the erecting of shade netting above the fenced off areas may need to be considered. • All vehicles transporting sand/waste need to have tarpaulins covering their loads which will assist in any windblown sand occurring off the trucks. • Dust levels specified in the National Dust Control Regulations (GN 827 of November 2013) may not be exceeded. • A Complaints Register must be available at the site office for inspection by the ECO of dust complaints that may have been received. • The appointed ECO must undertake regular site inspections for the duration of the construction phase, and to produce regular ECO monitoring reports, auditing on the compliance with the conditions of the Environmental Authorisation and the approved EMP.
Residual impacts:	**None**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Potential impact and risk:	**Visual Impacts:** The construction phase is associated with temporary visual disturbances because of construction activities (excavations, vehicles, machinery, fences, and signage) that may have a negative visual impact to the area.
Nature of impact:	**Negative**
Extent and duration of impact:	**Site Specific: Temporary**
Consequence of impact or risk:	**Visual impacts to surrounding neighbours**
Probability of occurrence:	**Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resource**
Degree to which the impact can be reversed:	**Partly reversible**
Indirect impacts:	**None**
Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be avoided:	**Can be partially avoided**

Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be partially mitigated**
Proposed mitigation:	**<u>Visual Impacts:</u>** • The ECO must be consulted with to determine the appropriate location for the site camp (if required). • The site camp must be always kept neat and tidy and free of litter. • Waste must be managed according to the EMPr. • Good housekeeping practices on site must be maintained to ensure the site is kept neat and tidy. • The site camp, storage facilities, stockpiles, waste bins, and any other temporary structures on site should be located in such a way that they will present as little visual impact to surrounding residents and road users as possible. • Work on site must be well planned and well managed so that work proceeds quickly and efficiently, thus minimizing the disturbance time. • The site camp will require visual screening via shade cloth or other suitable material. • Special attention should be given to the screening of highly reflective material. • The use of lighting (if required) should consider surrounding land users and should present little or no nuisance. Downward facing, spill off type lighting is recommended. • Construction vehicles must enter and leave the site during working hours. • The appointed Environmental Control Officer (ECO) must undertake at least one site inspection bi-weekly for the duration of the construction phase, and produce a short ECO report monitoring the compliance of the property developer with the conditions of the approved EMP/EA.
Residual impacts:	**None**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Potential impact and risk:	**Odours & Emissions:** Construction related odours/emissions may cause a nuisance or health impacts to adjacent residents, staff on site.
Nature of impact:	**Negative**
Extent and duration of impact:	**Site Specific, Long-Term**
Consequence of impact or risk:	**Odour/Emissions nuisance to the adjacent residents and inhalation of construction related emissions could cause health impacts to those exposed to the fumes.**
Probability of occurrence:	**Improbable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resource**
Degree to which the impact can be reversed:	**Partly reversible**
Indirect impacts:	**Odour/Emissions nuisance to the adjacent residents and health impacts due to inhalation to those exposed to the construction related emissions.**
Cumulative impact prior to mitigation:	**Low**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be avoided:	**Avoidable**
Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be partially mitigated**
Proposed mitigation:	**<u>Odour/Emissions:</u>** • Awareness training of personnel at the site and for vehicle operators on site will be conducted.

	• Contractors and Principal Agent/s shall always comply with the relevant statutory requirements including the Occupational Health and Safety Act, Act 85 of 1993. • The development of site-specific protocols regarding delivery and use of products and use of the relevant SANS procedures.
Residual impacts:	**Health impacts**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low to Medium**
Potential impact and risk:	**Freshwater Resources:** Construction related activities impacting groundwater and the water resources associated with the surrounding area.
Nature of impact:	**Negative**
Extent and duration of impact:	**Site Specific, Long-Term**
Consequence of impact or risk:	**The contamination of freshwater resources.**
Probability of occurrence:	**Improbable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resource**
Degree to which the impact can be reversed:	**Reversible**
Indirect impacts:	**The contamination of freshwater resources.**
Cumulative impact prior to mitigation:	**Low**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be avoided:	**Avoidable**
Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be mitigated**
Proposed mitigation:	**<u>Freshwater resources mitigation measures:</u>** • A minimum 32 m buffer must be maintained between the Kuils River edge and the nearest development footprint. This buffer will function as a no-go area for construction and will be rehabilitated with indigenous riparian vegetation to stabilise soils, filter surface runoff, and maintain habitat connectivity. • All permanent structures, hard surfaces, and bulk services must be located outside the 1:100-year floodline, as delineated by the Engineering Floodline Assessment (2025). The flood prone eastern portion of the site should remain undeveloped and integrated into the open space network. • Implement Water Sensitive Urban Design (WSUD) measures including detention ponds, vegetated swales, and litter trap structures to attenuate runoff and remove pollutants before discharge into the Kuils River. • Design stormwater outfalls with energy dissipation structures (e.g., rip-rap aprons) to prevent scouring and erosion of the riverbank. • Ensure stormwater discharge points are appropriately vegetated and stabilised to reduce sedimentation and turbidity. • Install silt fences, berms, and sediment traps downslope of disturbed areas to prevent sediment laden runoff from entering the river. • Schedule earthworks during dry season months to minimise erosion risk. • Stabilise exposed soils with temporary cover (mulch or grassing) immediately after disturbance. • Remove all alien invasive vegetation (e.g., *Eucalyptus* and *Melia azedarach*) within the riparian corridor and replace

	with locally indigenous riparian species such as *Phragmites australis*, *Juncus kraussii*, and *Searsia* spp. • Undertake long term monitoring and maintenance of the rehabilitated buffer area to ensure establishment success and suppression of alien re-growth. • Establish a clearly demarcated construction exclusion zone along the Kuils River prior to site works. • Maintain spill kits onsite, with immediate containment and cleanup procedures for any hydrocarbon or concrete spills. • Ensure contractor environmental awareness training includes watercourse protection measures and buffer area restrictions. • Conduct annual inspections of stormwater infrastructure and the riparian buffer for erosion, sedimentation, or vegetation failure. • Repair and rehabilitate any affected areas promptly. • Monitor stormwater discharge quality periodically to confirm compliance with City of Cape Town and National Water Act standards. • Awareness training of personnel at the site and for vehicle operators on site will be conducted. • Undertake riparian rehabilitation, including alien vegetation clearing and indigenous planting. • Strict "no-go" demarcation of wetland and river buffer areas during construction. • Integrate wetland features into stormwater management system for ecological and aesthetic value. • Continuous monitoring of water quality and flow regulation. • Install attenuation ponds, oil/silt traps, and permeable paving to reduce peak runoff and improve quality. • Implement an onsite detention system to prevent downstream flooding. • Develop a stormwater infrastructure maintenance plan to ensure long term functioning.
Residual impacts:	**Health impacts**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low to Medium**
Potential impact and risk:	**Solid Waste:** The potential solid waste impacts associated with the nature of activities of a construction site require that solid waste impact mitigation measures are considered and implemented where required.
Nature of impact:	**Negative**
Extent and duration of impact:	**Site Specific, Short-Term**
Consequence of impact or risk:	**Waste generated on site, pollutant if not correctly managed**
Probability of occurrence:	**Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resources**
Degree to which the impact can be reversed:	**Reversible**
Indirect impacts:	**Pollution of the surrounding environment if solid waste isn't correctly managed.**
Cumulative impact prior to mitigation:	**Low**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be avoided:	**Can be avoided**
Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be mitigated**
Proposed mitigation:	**<u>Solid waste management:</u>**

	• All waste generated during the construction activity will be stored on site in a covered waste containers and emptied regularly by a private waste contractor. • The Contractor will be bound by relevant mitigation measures as detailed in the Construction EMP.
Residual impacts:	**None**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Potential impact and risk:	**Effluent:** The potential effluent impacts associated with the nature of activities of a construction site require that effluent impact mitigation measures are considered and implemented where required.
Nature of impact:	**Negative**
Extent and duration of impact:	**Site Specific, Short-Term**
Consequence of impact or risk:	**Effluent waste can pollute the surrounding environment if not correctly managed**
Probability of occurrence:	**Improbable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resources**
Degree to which the impact can be reversed:	**Reversible**
Indirect impacts:	**Effluent waste can pollute the surrounding environment if not correctly managed**
Cumulative impact prior to mitigation:	**Low**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be avoided:	**Can be avoided**
Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be mitigated**
Proposed mitigation:	**<u>Effluent waste management:</u>** • The Contractor will be bound by relevant mitigation measures as detailed in the EMPr. • Chemical toilet facilities are to be supplied and managed by the Contractor. These are to be in a specific area agreed to by the ECO prior to placement and to be used by all personnel. • The number of chemical/portable toilets required on site (i.e. the ratio of persons working on site to number of toilets) must be determined in conjunction with the City of Cape Town Municipality prior to works starting on site. This is typically one toilet per 15 workers. • These toilets are to be secured by at least four separate cables or guy ropes to ensure that they are not knocked over or blown over by the wind.
Residual impacts:	**None**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Potential impact and risk:	**Hazardous Waste:** The potentially hazardous waste impacts associated with the nature of activities of a construction site require that hazardous waste impact mitigation measures are considered and implemented where required.
Nature of impact:	**Negative**
Extent and duration of impact:	**Site Specific, Short-Term**
Consequence of impact or risk:	**Hazardous waste spills can negatively affect the surrounding environment (ground contamination). Fuel, oil, lubricants and other pollutants may leak from vehicles/ machinery and contaminate the soil.**
Probability of occurrence:	**Improbable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resources**
Degree to which the impact can be reversed:	**Reversible**
Indirect impacts:	**Soil and groundwater contamination could result in human health impacts if humans are exposed to the soil or contaminated**

	groundwater by dermal contact (touching the soil or drinking the groundwater)
Cumulative impact prior to mitigation:	**Low**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be avoided:	**Can be avoided**
Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be mitigated**
Proposed mitigation:	**Hazardous waste management:** • The Contractor will be bound by relevant mitigation measures as detailed in the EMPr. • Drip trays will be available for any vehicles that may be potentially leaking. • Emergency spill kits will be kept on site. • The maintenance must comply with local authority bylaws and all procedures and equipment used must be in accordance with the Occupational Health & Safety Act (No. 85 of 1993). • If an "incident" takes place on site, the main contractor must within 14 days of the incident, report to the Director General, the provincial head of department and the municipality such information as is available to enable an initial evaluation of the incident, including: a) the nature of the incident. b) the substances involved and an estimation of the quantity released and their possible acute effect on people and the environment and data needed to assess these effects. c) initial measures are being taken to minimise impacts. d) causes of the incident, whether direct or indirect, including equipment, technology, system, or management failure. e) measures taken and to be taken to avoid a recurrence of such incident.
Residual impacts:	**None**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low to Medium**
Potential impact and risk:	**Traffic Impact:** Congestion and safety risks from construction-related vehicles on local roads.
Nature of impact:	**Negative**
Extent and duration of impact:	**Local: Short Term**
Consequence of impact or risk:	**Delays at intersections, unsafe conditions for other road users**
Probability of occurrence:	**Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resource**
Degree to which the impact can be reversed:	**Completely reversible**
Indirect impacts:	**Increased noise, dust, and reduced accessibility for local communities.**
Cumulative impact prior to mitigation:	**Medium**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Medium**
Degree to which the impact can be avoided:	**Partially**
Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be mitigated**
Proposed mitigation:	**Traffic Mitigation:** • Prepare and implement a Construction Traffic Management Plan (CTMP) in consultation with the City of Cape Town's Transport Directorate. • Schedule deliveries and heavy vehicle movements outside of peak traffic hours to minimise congestion.

	• Provide clear directional signage and flag personnel where construction vehicles enter or exit public roads. • Ensure construction vehicles and materials are parked or stored within the site boundary and not along public roads or sidewalks. • Maintain clean road conditions by regularly sweeping access routes to remove mud, dust, and debris from construction activities. • Establish speed limits (≤30 km/h) for all construction vehicles within and adjacent to the site. • Provide safe pedestrian routes and temporary crossings if walkways are affected during construction. • Conduct driver induction and awareness training for all contractors to reinforce safety and community respect.
Residual impacts:	**Minor temporary congestion**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**

OPERATIONAL PHASE	
Potential impact and risk:	**Noise:** The potential noise impacts associated with the nature of activities for the proposed development are anticipated to be limited and of a cumulative negative effect.
Nature of impact:	**Negative**
Extent and duration of impact:	**Site-Specific, Long-Term**
Consequence of impact or risk:	**Nuisance to surrounding residence**
Probability of occurrence:	**Improbable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resource**
Degree to which the impact can be reversed:	**Completely reversible**
Indirect impacts:	**Nuisance impacts to surrounding neighbours**
Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be avoided:	**Can be avoided**
Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be mitigated**
Proposed mitigation:	**Noise:** • All occupants will be bound by the relevant local authority by-laws • regarding noise generation. • All occupants will be bound by any other relevant noise legislation.
Residual impacts:	None
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Potential impact and risk:	**Traffic:** The influx of residential and commercial properties could have an impact on traffic in the surrounding area.
Nature of impact:	**Negative**
Extent and duration of impact:	**Site-Specific, Long-Term**
Consequence of impact or risk:	**Surrounding neighbours are negatively impacted by the influx of cars/public transport users.**
Probability of occurrence:	**Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resource**
Degree to which the impact can be reversed:	**Can be reversed**
Indirect impacts:	**Increase in traffic pressure due to the addition of vehicles and users of public transport**
Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be avoided:	**Can be partially avoided**
Degree to which the impact can be managed:	**Can be partially managed**

Degree to which the impact can be mitigated:	**Can be partially mitigated**
Proposed mitigation:	**<u>Traffic mitigation:</u>** • Implement all intersection upgrades and signage recommended in the approved Traffic Impact Assessment (TIA) to ensure safe vehicle movement at the Reuter Street and Old Nooiensfontein Road access points. • Maintain adequate sight distances at all junctions and internal intersections in line with City of Cape Town geometric design standards. • Periodically review intersection performance and apply signal timing or marking adjustments as traffic volumes increase. • Introduce traffic calming measures such as raised intersections, speed humps, and narrowed carriageways along residential streets to maintain low speeds (≤40 km/h). • Provide clearly marked pedestrian crossings at key nodes and near public facilities such as the crèche and open spaces. • Enforce on-site speed limits and display visible signage at estate or precinct entrances. • Ensure continuous, well-lit sidewalks and dedicated pedestrian pathways within the development. • Install barrier kerbs and tactile paving where required to improve accessibility and safety for all users. • Promote cycling and walking through provision of bicycle racks and clear route signage linking to nearby public transport corridors. • Provide onsite parking in accordance with the City's Development Management Scheme (DMS) to avoid congestion and on street parking overflow. • Maintain clearly defined entrances and exits, with signage to manage one-way flows if applicable. • Designate visitor parking bays and enforce no parking zones near intersections and pedestrian crossings. • Facilitate access to existing minibus, taxi and bus routes by ensuring safe pullover or waiting areas near the development entrance. • Coordinate with the City's Transport Directorate to integrate any future MyCiTi or formalised public transport routes into the area's mobility network. • Conduct routine inspections of road markings, signage, and lighting, and repair promptly as needed. • Implement a community reporting mechanism for road or traffic issues to ensure early corrective action. • Review traffic patterns annually and introduce adaptive management measures if congestion or safety issues arise.
Residual impacts:	**None**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Potential impact and risk:	**Visual:** The potential visual impacts associated with the nature of activities are of a cumulative negative nature.
Nature of impact:	**Negative**
Extent and duration of impact:	**Site-specific, Long-Term**
Consequence of impact or risk:	**Surrounding neighbours are negatively impacted by the addition of the new housing development**
Probability of occurrence:	**Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resources**
Degree to which the impact can be reversed:	**Cannot be reversed**
Indirect impacts:	**Surrounding land and property owners are negatively affected by the visual impact of the new housing development**
Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be avoided:	**Can be partially avoided**
Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be partially mitigated**
Proposed mitigation:	**<u>Proposed Mitigation:</u>**

	• Ensure all buildings, boundary walls, and structures conform to uniform architectural guidelines in terms of height, colour palette, and materials, blending with the surrounding urban fabric. • Use neutral, non-reflective colours and natural materials (e.g., brick, stone, muted tones) to reduce visual contrast and glare. • Avoid excessive signage, reflective surfaces, and cluttered façades along public frontages. • Implement a comprehensive landscaping plan using locally indigenous plant species to soften the built form and visually integrate the development into the surrounding environment. • Maintain vegetated buffers and tree planting along roads, open spaces, and the Kuils River corridor to screen-built elements from nearby viewpoints. • Replace dead or damaged plants promptly to ensure continuous visual coverage. • Install energy efficient LED lighting designed to minimise light spill and glare beyond the development boundary. • Use downward facing, shielded luminaires that direct light only where needed for safety and security. • Avoid excessive or decorative illumination that could create visual intrusion or sky glow. • Conduct routine maintenance of landscaping, street furniture, and signage to retain a neat and orderly appearance. • Keep public open spaces, pathways, and stormwater areas clean and well managed to maintain a positive visual impression. • Regularly remove litter, illegal dumping, and graffiti to prevent visual degradation. • Retain and enhance the natural topography and riparian buffer along the Kuils River, using landscaping to visually connect built areas with green infrastructure. • Position open spaces and recreational areas to preserve key visual corridors towards the riparian zone and surrounding landscape features. • Encourage residents' associations or body corporates to enforce design controls and maintenance standards over time. • Include educational signage or community information boards that promote environmental awareness and pride in the local landscape character.
Residual impacts:	**None**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Potential impact and risk:	**Solid Waste:** The potential solid waste impacts associated with the nature of activities for the proposed development require that solid waste impact mitigation measures are considered and implemented where required.
Nature of impact:	**Negative**
Extent and duration of impact:	**Site-specific, Long-Term**
Consequence of impact or risk:	**The improper management of solid waste, resulting in the pollution and overall negative impact on the surrounding environment.**
Probability of occurrence:	**Improbable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resources**
Degree to which the impact can be reversed:	**Can be reversed**
Indirect impacts:	**Pollution of the surrounding environment**
Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be avoided:	**Can be avoided**
Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be mitigated**
Proposed mitigation:	**Solid Waste Management:** • All solid waste generated on site will be collected by either the local municipality or a licensed waste contractor. • Further, the Applicant will implement an Integrated Waste Management Plan as approved

	• by the DEA&DP (stipulated in the EMPr, **Appendix H**) and this may include the principles of re-use and recycling of waste. • The Applicant will be bound by relevant mitigation measures as detailed in the EMPr.
Residual impacts:	**None**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Potential impact and risk:	**Domestic Effluent:** No industrial or domestic effluent other than sewage will be generated during the operational phase of the proposed activity.
Nature of impact:	**Negative**
Extent and duration of impact:	**Site-specific, Long-Term**
Consequence of impact or risk:	**The improper management of domestic effluent, resulting in the pollution and overall negative impact on the surrounding environment.**
Probability of occurrence:	**Improbable**
Degree to which the impact may cause irreplaceable loss of resources:	**No loss of resources**
Degree to which the impact can be reversed:	**Can be reversed**
Indirect impacts:	**Pollution of the surrounding environment**
Cumulative impact prior to mitigation:	**Negligible**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Degree to which the impact can be avoided:	**Can be avoided**
Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be mitigated**
Proposed mitigation:	**Solid Waste Management:** • Sewage effluent will be disposed of through the Municipal Sewage system. • The Applicant will be bound by relevant mitigation measures as detailed in the EMPr (**Appendix H**).
Residual impacts:	**None**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Potential impact and risk:	**Aquatic Impact:** Increased runoff and stormwater pollution.
Nature of impact:	**Negative**
Extent and duration of impact:	**Local, Long-Term**
Consequence of impact or risk:	**Degradation of aquatic habitats and ecological support functions.**
Probability of occurrence:	**Improbable**
Degree to which the impact may cause irreplaceable loss of resources:	**Possible**
Degree to which the impact can be reversed:	**Reversible through rehabilitation and water-sensitive design.**
Indirect impacts:	**Cumulative downstream water quality deterioration.**
Cumulative impact prior to mitigation:	**Medium–High**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Medium–High**
Degree to which the impact can be avoided:	**Can be avoided**
Degree to which the impact can be managed:	**Can be managed**
Degree to which the impact can be mitigated:	**Can be mitigated**
Proposed mitigation:	**Proposed mitigation:** **Protection and Maintenance of the Riparian Buffer Zone:** • Retain the minimum 32 m riparian buffer along the Kuils River as a permanent no build zone. • Maintain indigenous vegetation cover within the buffer to stabilise soils, filter stormwater runoff, and support riparian habitat connectivity. • Prohibit mowing, clearing, dumping, or informal footpaths within the buffer area to prevent degradation and erosion. **Stormwater Quality and Flow Management:**

	• Operate and maintain all Water Sensitive Urban Design (WSUD) features, including detention ponds, swales, and litter traps, to ensure consistent functionality. • Conduct regular inspections and sediment removal from detention ponds and swales to maintain storage capacity and water quality treatment efficiency. • Ensure stormwater outfalls remain stabilised with rock armouring or gabions to prevent erosion and sedimentation at discharge points. • Prevent discharge of pollutants, hydrocarbons, or greywater into the stormwater network. **Monitoring and Compliance:** • Implement a routine monitoring programme (at least annually) to assess stormwater discharge quality and riparian vegetation condition. • Record and address signs of erosion, litter accumulation, or water stagnation promptly. • Submit monitoring results to the City of Cape Town's Environmental Resource Management Department where required. **Alien Vegetation Control and Riparian Rehabilitation:** • Implement a long-term alien invasive plant management programme, focusing on species such as Eucalyptus spp., Melia azedarach, and Acacia saligna. • Rehabilitate disturbed riparian areas using locally indigenous species suited to wetland and riverine conditions (e.g., Phragmites australis, Juncus kraussii, Cyperus textilis). • Maintain the buffer zone through annual vegetation audits and replacement of failed plantings. **Pollution Prevention and Spill Response:** • Ensure all operational areas (parking, maintenance, and business sites) are equipped with oil and grease traps where applicable. • Maintain an emergency spill-response plan and spill kits to contain any hydrocarbon leaks or hazardous-material spills before they reach the stormwater system. • Educate residents and maintenance staff on pollution prevention and waste disposal practices, including prohibition of dumping into drains or river corridors. **Public Awareness and Stewardship:** • Erect educational signage along open-space corridors and stormwater ponds to promote community stewardship and discourage littering or off-road vehicle access. • Involve local community groups in periodic clean-up and maintenance days to foster shared responsibility for riparian ecosystem health.
Residual impacts:	**Buffers and systems functioning as ecological corridors.**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

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

A range of specialist studies were undertaken to assess the potential environmental sensitivities and impacts associated with the proposed mixed-use residential development on Remainder Farm 1388, Kuils River. The findings and corresponding management measures have been incorporated into the design, layout, and operational framework of the project to ensure compliance with environmental legislation and the principles of sustainable development.

Agricultural Impact

The Agricultural Compliance Statement (SoilZA, 2025) confirmed that the site, although initially classified by the national screening tool as having medium to high agricultural sensitivity, is highly transformed and of low agricultural potential. The specialist's field verification found that the land is isolated from functional agricultural zones, surrounded by urban development, lacks any agricultural infrastructure, and is too small (20.2 ha cadastral extent) to achieve economies of scale needed for viable crop production. Although climate and terrain conditions could theoretically support agriculture, the land's location, fragmentation, and disturbance history render it unsuitable for present or future agricultural production.

No mitigation measures are required because the site is not currently used for agriculture, and no realistic loss of agricultural production potential will occur. The specialist concludes that the proposed development will result in a negligible agricultural impact and recommends approval of the project without conditions.

These findings directly influenced the proposed development by confirming that the transformation of the site for residential use will not compromise regional agricultural resources, enabling the layout to proceed without the need for alternative siting, footprint reduction, or buffering for agricultural purposes. The low sensitivity rating also verified that the development aligns with the principles of sustainable land-use transition within the urban edge, supporting the prioritisation of urban infill over expansion onto viable agricultural land.

Aquatic Biodiversity and Surface Water

The Aquatic Biodiversity Assessment (The Biodiversity Company, 2025) and Floodline Delineation (The Engineering Floodline Assessment, 2025) confirmed that the Kuils River and its associated floodplain represent a Very High aquatic sensitivity area along the eastern boundary of the site. Approximately 40% of the property lies within the 1:100-year floodline.

- Key mitigation measures include the establishment of a minimum 32 m riparian buffer, exclusion of any permanent infrastructure from the floodplain, and implementation of Water Sensitive Urban Design (WSUD) systems such as detention ponds, swales, and litter traps to manage water quality and flow.
- Influence on development: The development footprint was shifted westwards, ensuring all housing and road infrastructure are located outside the delineated floodline, with the eastern section reserved for open space, stormwater management, and riparian rehabilitation.

Terrestrial Biodiversity

The Terrestrial Biodiversity Compliance Statement (The Biodiversity Company, 2025) identified the site as highly transformed with no remnant indigenous vegetation or intact habitat. The area falls within a Transformed Zone in the Western Cape Biodiversity Spatial Plan (WCBSP) and does not intersect any Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs).

- Key mitigation measures include the removal of alien vegetation, re-vegetation with locally indigenous species, and maintenance of the riparian buffer as a functional ecological corridor.
- Influence on development: The terrestrial findings confirmed that development of the western portion of the site would not result in significant biodiversity loss, supporting its suitability for urban infill.

Floodline and Stormwater Management

The Floodline Delineation Report (The Engineering Floodline Assessment (2025),) established the hydrological constraints of the site, recommending that all development occur above the 1:100-year floodline.

- Key mitigation measures include the integration of attenuation ponds, energy dissipation structures, and controlled stormwater discharge to prevent downstream flooding and erosion.
- Influence on development: The floodline findings directly defined the no-go area along the river and guided the siting of stormwater infrastructure and the open space network.

Traffic Impact

The Traffic Impact Assessment (Liezl Stodart, Pr. Eng., 2025) determined that the proposed development will generate manageable traffic volumes, provided that intersection upgrades and signage improvements are implemented at the Reuter Street and Old Nooiensfontein Road access points.

- Key mitigation measures include construction of a dedicated access road, pedestrian crossings, traffic calming within internal streets, and staggered delivery schedules during construction.
- Influence on development: The layout accommodates two formalised access points and internal road widths compliant with City of Cape Town standards, ensuring safe and efficient circulation.

Civil and Electrical Engineering Services

The Civil Services Report (E2C Consulting Engineers, 2025) and Electrical Engineering Report (E2C Engineers, 2025) confirmed adequate bulk capacity within the City's Belhar PRV Zone and Bellville Wastewater Treatment Works, and proposed connection to the planned 11 kV CoCT substation at Hamilton Estate.

- Key mitigation measures include phased service installation, gravity fed drainage systems, and energy-efficient LED lighting.
- Influence on development: These findings enabled efficient network integration without off site infrastructure expansion, supporting resource efficient urban growth.

Tree and Landscape Assessment

The Tree Survey (Annelies Slabbert Landscape Architect CC, 2025) identified four non-indigenous trees on site, all in poor condition and recommended for removal.

- Key mitigation measures include replanting with indigenous species and landscape rehabilitation in open spaces and along the river buffer.
- Influence on development: The landscaping plan now focuses on indigenous vegetation restoration to enhance biodiversity and reduce water demand.

Socio-Economic Considerations

The socio-economic context (based on City of Cape Town Census and IDP data) reflects a diverse, moderately urbanised community with a strong need for affordable housing and local employment opportunities.

- Key mitigation and enhancement measures include local labour procurement, skills development, and integration of community amenities such as open spaces and a crèche site.
- Influence on development: The project design promotes inclusive, accessible, and socially cohesive neighbourhood planning, aligning with IDP and MSDF objectives.

The collective specialist findings have directly informed the layout, design, and management approach of the proposed development. The avoidance of the Kuils River floodplain, incorporation of ecological buffers and WSUD infrastructure, and

inclusion of urban design and landscaping elements ensure that environmental integrity is maintained while enabling social and economic benefits.

Through this integration process, the project has evolved into an environmentally responsible and context appropriate development, demonstrating alignment with the principles of sustainable development under NEMA and representing the Best Practicable Environmental Option (BPEO) for Farm 1388, Kuils River.

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

Aquatic and Freshwater Management (The Biodiversity Company, 2025)

- Maintain a minimum 32 m riparian buffer from the edge of the Kuils River, demarcated as a permanent no-go area for construction.
- Implement Water Sensitive Urban Design (WSUD) measures including detention ponds, vegetated swales, and litter traps to attenuate runoff and improve stormwater quality before discharge.
- Exclude all permanent structures and hard surfaces from the 1:100-year floodline, retaining this zone for open space and stormwater management.
- Stabilise all stormwater outfalls with energy dissipating structures (e.g., rock riprap or gabions).
- Enforce erosion control measures (e.g., silt fences, berms, sediment traps) during construction to prevent sedimentation of the river.
- Remove alien invasive vegetation (e.g., Eucalyptus, Melia azedarach, Acacia saligna) from the riparian area and replant with indigenous species.
- Implement a monitoring programme to inspect riparian and stormwater infrastructure at least annually for erosion, litter accumulation, or vegetation failure.
- Prohibit dumping, stockpiling, or fuel storage within 50 m of the Kuils River and floodplain.

Terrestrial Biodiversity and Vegetation Management (The Biodiversity Company, 2025)

- Undertake alien vegetation control throughout the site prior to construction and during the operational phase.
- Landscape open space areas with locally indigenous, water wise species to improve biodiversity and visual integration.
- Prevent the introduction or re-establishment of invasive alien plants through ongoing maintenance and community awareness.
- Limit construction to previously disturbed areas to prevent unnecessary habitat loss or soil compaction.

Floodline and Stormwater Management (The Biodiversity Company, 2025 / E2C Consulting Engineers, 2025)

- Keep all built infrastructure above the 1:100-year floodline.
- Ensure detention ponds are designed and maintained to manage both stormwater quantity and quality, releasing flows at pre-development rates.
- Regularly inspect and clear stormwater structures of debris and sediment to ensure hydraulic functionality.
- Design and maintain vegetated swales and retention basins to promote infiltration and filtration of runoff.
- Prevent soil erosion within the floodplain by stabilising embankments and using natural vegetative reinforcement.

Traffic and Access Management (Liezl Stodart, Pr. Eng., 2025)

- Prepare and implement a Construction Traffic Management Plan (CTMP) to control site access, vehicle movements, and scheduling.
- Install directional and warning signage at all site access points.
- Provide safe pedestrian crossings and sidewalks to encourage non-motorised transport (NMT).
- Introduce traffic calming measures such as raised intersections and speed humps on internal roads.

- Conduct regular road maintenance and keep public access routes free of debris during construction.

Civil and Electrical Infrastructure (E2C / Ifindo Engineers, 2025)

- Integrate services with existing municipal infrastructure (water, sewer, stormwater, and electricity) to prevent duplication or overloading.
- Implement phased installation of infrastructure to minimise disturbance and align with construction sequencing.
- Ensure energy efficient LED lighting and low flow plumbing fittings are installed to reduce operational resource demand.
- Provide oil and grease traps where necessary to prevent hydrocarbons entering the stormwater system.
- Conduct regular maintenance of service infrastructure to prevent leaks, blockages, or energy inefficiencies.

Tree and Landscape Management (Annelies Slabbert Landscape Architect CC, 2025)

- Remove all non-indigenous trees identified in the Tree Survey and replace them with appropriate indigenous species.
- Implement a landscape plan for public open spaces, riparian buffers, and stormwater areas to enhance aesthetics and ecosystem function.
- Maintain vegetative screening along roadways and the Kuils River buffer to improve visual quality and reduce glare.

Socio-Economic and Community Considerations

- Prioritise local labour and SMME participation during construction and operation.
- Include skills development and training opportunities for workers in basic construction, maintenance, and environmental management.
- Maintain open communication channels with surrounding communities to address grievances promptly.
- Ensure health and safety protocols are followed onsite in accordance with the Occupational Health and Safety Act (No. 85 of 1993).
- Implement waste minimisation practices through separation, recycling, and correct disposal at licensed facilities.

General Environmental Management

- Clearly demarcate no-go areas, including the riparian buffer and floodplain, before construction begins.
- Implement environmental induction training for all contractors and workers.
- Conduct regular environmental inspections and audits by the Environmental Control Officer (ECO) throughout construction.
- Maintain an incident reporting and corrective action log for environmental non-compliances.
- Restore and rehabilitate disturbed areas immediately after construction completion.

3.	List the specialist investigations and the impact management measures that will **not** be implemented and provide an explanation as to why these measures will not be implemented.
N/A	
4.	Explain how the proposed development will impact the surrounding communities.

The proposed development is expected to have a predominantly positive impact on the surrounding communities of Belhar, Wesbank, and Sarepta, which are characterised by high population densities, limited affordable housing availability, and varying socio-economic conditions. During the construction phase, the project will create short-term employment and procurement opportunities for local residents and small contractors, stimulating the local economy and transferring skills. The increase in local economic activity may temporarily elevate traffic volumes and noise levels; however, these effects will be short-term and managed through the EMPr, including construction hour restrictions, dust suppression, and traffic management plans.

Over the long term, the development will contribute to improved social integration and spatial equity by providing approximately 486 well located housing opportunities within the existing urban footprint, close to schools, public transport routes, and municipal services. The inclusion of public open spaces, pedestrian walkways, and a general business erf will improve neighbourhood connectivity, access to amenities, and the overall quality of life for existing and new residents. The project is also anticipated to reduce informal-settlement pressure in nearby areas by increasing the supply of serviced residential stands.

Potential negative impacts, such as temporary visual change, increased traffic, and construction-related disturbance, will be localised and effectively mitigated through environmental and community management measures. Overall, the development will enhance the economic vitality, social cohesion, and safety of the surrounding area and is therefore considered socially beneficial and compatible with the existing urban environment of Kuils River.

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

The potential risks associated with climate change including increased rainfall variability, more intense storm events, higher flood peaks, and gradual temperature rise have been carefully considered in the planning and design of the proposed development on Farm 1388, Kuils River. The site lies adjacent to the Kuils River, making flood resilience a key design priority. The Floodline Delineation Report (The Engineering Floodline Assessment (2025) modelled the 1:100-year floodline, and all development has been confined to areas outside this extent, ensuring that dwellings and infrastructure remain above potential inundation zones even under future climate change scenarios that may increase runoff intensity.

To further enhance climate resilience, the project incorporates Water Sensitive Urban Design (WSUD) measures such as detention ponds, vegetated swales, and energy dissipating outfalls, which help regulate stormwater flow, promote infiltration, and improve water quality. These systems have been designed with additional capacity to accommodate future increases in rainfall intensity. The riparian buffer zone will remain undeveloped and rehabilitated with indigenous vegetation, stabilising the riverbank and reducing erosion during extreme weather events.

From an energy and resource perspective, the development will utilise energy efficient LED lighting, solar ready connections, and low-flow water fittings to reduce resource demand and greenhouse gas emissions during operation. Building orientation and landscaping will promote natural ventilation and shading, lowering heat stress and energy use.

In summary, the proposed development has actively integrated climate change adaptation and mitigation principles into its layout, infrastructure, and material choices. The result is a resilient, resource efficient, and future proof urban form that can withstand the projected environmental pressures associated with a changing climate while safeguarding both residents and ecological systems.

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

No material conflicts were identified between the findings or recommendations of the various specialist studies conducted for the proposed development on Farm 1388, Kuils River. All specialists including those for aquatic biodiversity, terrestrial biodiversity, floodline delineation, traffic, civil and electrical engineering, and landscaping reached complementary conclusions that informed a unified, environmentally responsible site layout.

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

The findings and recommendations of all specialist studies have been systematically integrated throughout the design, layout, and environmental management planning of the proposed development on Farm 1388, Kuils River to ensure that the most appropriate mitigation measures are implemented. The Floodline Delineation Report (The Biodiversity Company, 2025) and the

Aquatic Biodiversity Assessment (The Biodiversity Company, 2025) together defined the primary environmental constraint the Kuils River corridor and its 1:100-year floodplain which was established as a no-go area and shaped the western shift of the developable footprint. The 32 m riparian buffer recommended by both specialists was adopted as a permanent ecological and stormwater management zone.

These hydrological findings were then aligned with the civil engineering design (E2C Consulting Engineers, 2025) to incorporate Water Sensitive Urban Design (WSUD) systems, including detention ponds, vegetated swales, and litter traps, to regulate runoff, protect water quality, and reduce flood risk. The terrestrial biodiversity assessment confirmed that the remaining area is highly transformed with negligible ecological value, enabling its use for urban infill provided that indigenous landscaping and alien-plant control are implemented both now included in the Environmental Management Programme (EMPr).

The Agricultural Compliance Statement (SoilZA, 2025) further supported the suitability of the site for development by verifying that the land is entirely transformed, isolated from productive agricultural areas, and of low agricultural sensitivity. The study concluded that the development would result in a negligible loss of agricultural potential, requiring no agricultural mitigation measures. This confirmation allowed the development footprint to proceed without the need for agricultural buffers, footprint reduction, or alternative siting, reinforcing the project's alignment with urban-edge infill planning principles.

The Traffic Impact Assessment (Liezl Stodart, Pr. Eng.) informed the placement of access points and internal roads to minimise congestion and enhance safety, while visual and tree assessment inputs (Annelies Slabbert Landscape Architect CC) guided buffer planting and landscaping to soften built form visibility along the river corridor and external road edges. The civil and electrical reports introduced energy and resource efficiency measures, such as LED lighting and low flow water fittings, aligning infrastructure design with environmental sustainability objectives.

All these specialist recommendations were consolidated within the EMPr, ensuring that mitigation measures address potential hydrological, ecological, visual, traffic, and socio-economic impacts in a coordinated manner. This integrated approach guarantees that the final development layout and management framework embody the Best Practicable Environmental Option (BPEO) balancing environmental protection, infrastructure feasibility, and community benefit within the urban context of Kuils River.

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

The mitigation hierarchy avoid, minimise, rehabilitate, and offset has been applied throughout the design, assessment, and planning of the proposed mixed-use residential development on Farm 1388, Kuils River to ensure that the Best Practicable Environmental Option (BPEO) is achieved.

Avoidance was prioritised during site selection and layout planning. The Kuils River floodplain, delineated by The Biodiversity Company (2025), was identified as a no-go area, and all development was located outside the 1:100-year floodline. Similarly, areas of very high aquatic sensitivity and riparian habitat were fully excluded from the developable footprint. This proactive avoidance eliminated the potential for direct impacts on sensitive freshwater ecosystems.

Minimisation was achieved by refining the layout to reduce the extent of land disturbance, managing stormwater runoff through Water Sensitive Urban Design (WSUD) features such as detention ponds and vegetated swales, and incorporating energy and resource efficient technologies to limit operational emissions and water demand. Construction phase impacts, including dust, noise, and erosion, will be reduced through best practice environmental controls outlined in the EMPr.

Rehabilitation will take place within the retained riparian buffer zone, where alien invasive vegetation will be removed and replaced with locally indigenous plant species to restore natural riverbank stability, ecological connectivity, and aesthetic value. Stormwater management areas will be vegetated and maintained as functional ecological corridors.

Offsetting was not deemed necessary, as all significant impacts have been effectively avoided or mitigated onsite through the measures described above.

By systematically applying this hierarchy, the project balances the need for urban housing and infrastructure provision with the protection of ecological systems and water resources, resulting in a development that is environmentally sound, socially beneficial, and economically feasible the defining characteristics of the Best Practicable Environmental Option (BPEO) for Farm 1388, Kuils River.

SECTION J: GENERAL

1. Environmental Impact Statement

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

The Environmental Impact Assessment (EIA) process for the proposed mixed-use residential development on Farm 1388, Kuils River has identified no fatal flaws that would prevent the project from proceeding, provided that the recommended mitigation measures are implemented. The key findings are summarised as follows:

- **Site suitability:** The site lies within the urban edge of the City of Cape Town and is already transformed due to historic agricultural and informal disturbance. The property is strategically located near existing road infrastructure, schools, and services, making it ideally suited for sustainable urban infill and mixed-income housing.

- **Aquatic and floodline sensitivity:** The Kuils River forms the eastern boundary of the site and was identified as an area of Very High aquatic sensitivity. The 1:100-year floodline, delineated by The Biodiversity Company (2025), covers approximately 40% of the property. This area has been designated as a no-go zone and integrated into the open-space and stormwater management system. All development has been positioned outside the floodplain, thereby avoiding direct impacts on the river and ensuring compliance with the National Water Act (1998).

- **Agricultural Impact:** The Agricultural Compliance Statement (SoilZA, 2025) confirmed that the site is of low agricultural sensitivity, despite the national screening tool initially classifying portions of the property as medium to high sensitivity. Field verification determined that the land is highly transformed, isolated from active agricultural areas, and surrounded by established urban development, making it unsuitable for viable agricultural production. Although the region's climate and soils could theoretically support cultivation, the site's small size, fragmented context, absence of agricultural infrastructure, and long-term disturbance history render it uneconomical for any future agricultural use. The assessment concluded that the proposed development would result in a negligible loss of agricultural potential, with no significant impact on the Western Cape's agricultural resource base. No mitigation measures or conditions were deemed necessary, and the specialist recommended that the development be supported from an agricultural perspective.

- **Terrestrial biodiversity:** The Terrestrial Biodiversity Compliance Statement (The Biodiversity Company, 2025) confirmed that the site's terrestrial component is highly disturbed and contains no remnant indigenous vegetation or species of conservation concern. The area is mapped as transformed in the Western Cape Biodiversity Spatial Plan (WCBSP), and development will not result in loss of any Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs).

- **Hydrology and stormwater management:** The civil engineering design (E2C Consulting Engineers, 2025) incorporates Water Sensitive Urban Design (WSUD) principles including detention ponds, vegetated swales, and litter traps to manage stormwater quantity and quality. These measures will ensure that post development runoff rates do not exceed predevelopment levels, preventing downstream flooding and protecting water quality in the Kuils River.

- **Traffic and access:** The Traffic Impact Assessment (Liezl Stodart, Pr. Eng., 2025) concluded that the development will have a low to moderate traffic impact, with sufficient capacity on surrounding roads. The planned access via Reuter Street and Old Nooiensfontein Road is considered safe and feasible, subject to minor intersection upgrades and traffic calming measures within the development.

- **Social and economic considerations:** The development will provide approximately 486 housing opportunities, creating short-term employment during construction and contributing to local economic stimulation. In the long term, it will improve spatial integration, service accessibility, and quality of life for residents within the Kuils River area.

- **Visual and landscape aspects:** Visual impacts will be localised and low in magnitude, mitigated through indigenous landscaping, vegetative screening, and architectural guidelines that complement the surrounding urban context.

- **Cumulative impacts:** When considered in relation to other developments in the area, the project will not significantly increase pressure on municipal services or ecological systems, provided that the recommended environmental and engineering management measures are maintained.

- **Overall environmental significance:** After mitigation, all identified impacts were assessed as having low to medium significance, with no high or irreversible impacts anticipated. The proposed development represents an environmentally and socially sustainable land use outcome consistent with the National Environmental Management Act (NEMA) principles and the City of Cape Town's spatial and climate resilience strategies.

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

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

The assessment of the proposed mixed-use residential development on Farm 1388, Kuils River has identified a range of potential positive and negative environmental and socio-economic impacts. With the application of appropriate mitigation and management measures, all negative impacts can be reduced to low or acceptable levels, while the positive impacts are considered long-term and significant in promoting sustainable urban growth.

Positive Impacts

- **Provision of housing:** The development will deliver approximately 486 residential units, contributing meaningfully to addressing the local housing backlog and improving access to formal, serviced housing within the urban edge of the City of Cape Town.
- **Economic stimulation and job creation:** Construction activities will generate short- to medium-term employment and SMME opportunities, while the operational phase will support local economic activity through the creation of a mixed-use neighbourhood with a local business node.
- **Efficient land use:** The development optimises vacant, underutilised land within a fully serviced urban area, reducing urban sprawl and supporting compact city growth in line with the Municipal Spatial Development Framework (MSDF).
- **Infrastructure upgrades:** The project will improve local roads, stormwater systems, and public utilities, benefiting both the new residents and adjacent communities.
- **Environmental enhancement:** Rehabilitation of the riparian buffer zone along the Kuils River through alien clearing and indigenous replanting will enhance ecological function, improve water quality, and provide open-space and recreational value.
- **Social upliftment:** The development will strengthen social cohesion, provide safe pedestrian networks, and improve public safety and accessibility through lighting and urban design principles.

Negative Impacts and Risks

- **Aquatic and riparian impacts:** Potential exists for sedimentation, erosion, or runoff pollution affecting the Kuils River during construction. These risks will be mitigated through erosion control, stormwater quality management, and strict buffer zone protection.
- **Construction-phase disturbances:** Temporary dust, noise, and traffic increases may affect nearby residents. These will be managed through construction-phase controls, including working hour restrictions, dust suppression, and adherence to the Construction Traffic Management Plan.
- **Visual impacts:** Localised changes in visual character may occur; however, the use of indigenous landscaping, vegetative screening, and architectural design guidelines will minimise visual intrusion.
- **Traffic and accessibility:** Increased traffic during both construction and operation may temporarily affect road capacity. Mitigation includes intersection upgrades, traffic calming measures, and pedestrian safety infrastructure.
- **Waste generation:** Construction and domestic waste will increase; however, waste separation, recycling, and disposal via licensed facilities are prescribed in the EMPr.
- **Soil erosion and surface runoff:** Land disturbance during construction could lead to erosion; this will be mitigated through stormwater controls, temporary stabilization, and site rehabilitation post-construction.
- **Cumulative impacts:** The development will contribute to broader urban growth in the Kuils River corridor but given the site's transformed state and integration with existing infrastructure, cumulative effects are expected to be low and manageable.

Risk Assessment

No high or irreversible risks were identified. The key environmental risks primarily related to stormwater, flooding, and aquatic habitat disturbance are fully addressed through design avoidance, engineering controls, and long-term management commitments.

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

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

The following impact management outcomes have been identified based on the findings of the Environmental Impact Assessment (EIA), specialist studies, and associated management recommendations. These outcomes define the desired end-state after implementation of all mitigation and management measures and form the basis of the Environmental Management Programme (EMPr) for both the construction and operational phases.

Aquatic and Freshwater Environment

- The Kuils River floodplain and riparian buffer zone are protected from disturbance, with no development or infrastructure within the 1:100-year floodline.
- Water quality in the Kuils River is maintained or improved through effective stormwater quality management, detention ponds, vegetated swales, and litter trap systems.
- The riparian corridor is rehabilitated with indigenous vegetation, enhancing ecological integrity and connectivity.
- Long-term erosion and sedimentation risks are prevented through energy dissipating structures, bank stabilisation, and ongoing monitoring.

Desired outcome: A stable, functional, and rehabilitated riparian ecosystem that supports aquatic biodiversity and maintains downstream water quality in compliance with the National Water Act (1998).

Agricultural Impact

- The development footprint is located entirely within an area verified as low agricultural sensitivity, ensuring that no land of current or future agricultural value is lost.

- The site is confirmed as fully transformed, with no remaining natural or arable agricultural soils requiring protection.
- The development will not conflict with surrounding land uses, as the site is situated within an established urban area and not adjacent to any active agricultural operations.
- No agricultural mitigation measures are required, as the specialist identified negligible agricultural impact and confirmed that the site holds no viable agricultural production potential.
- The project supports a sustainable land-use transition by converting non-viable, historically transformed land to residential use, consistent with municipal spatial-planning priorities.
- Future land uses must remain compatible with the urban context, avoiding any activities that could introduce agricultural nuisances or environmental conflict.

Desired outcome: A development that results in no loss of viable agricultural land and ensures fully compatible long-term urban land use.

Terrestrial Biodiversity

- No loss of Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) occurs, as the developable footprint is restricted to transformed land.
- Alien invasive vegetation is removed and replaced with locally indigenous, waterwise species in open-space and landscaping areas.
- The ecological corridor along the river is enhanced through riparian restoration and connectivity with adjacent open spaces.

Desired outcome: A low-maintenance, indigenous landscape that improves ecological function, reduces water demand, and supports biodiversity rehabilitation objectives within a transformed urban setting.

Floodline and Stormwater Management

- All infrastructure is located above the 1:100-year floodline, eliminating flood risk to built structures.
- Post-development runoff rates do not exceed pre-development conditions, ensuring no downstream flooding or erosion.
- Stormwater detention and WSUD features remain fully functional and regularly maintained.

Desired outcome: A resilient and climate adapted urban system with sustainable stormwater drainage that protects infrastructure, property, and the natural hydrological regime.

Traffic and Transport

- Safe and efficient access is maintained via Reuter Street and Old Nooiensfontein Road, with intersections upgraded as per the Traffic Impact Assessment (TIA).
- Internal roads, pedestrian crossings, and sidewalks meet City of Cape Town mobility standards and prioritise non-motorised transport.
- Traffic calming measures are effective in maintaining low speeds and ensuring resident and pedestrian safety.

Desired outcome: A safe, accessible, and integrated road network that accommodates residential and business traffic while promoting non-motorised mobility.

Visual and Landscape Character

- The development blends with the existing urban context through consistent architectural design, colour palette, and vegetated screening.

- Public open spaces and riparian buffers are landscaped with indigenous vegetation to soften built edges and enhance visual quality.
- Lighting is controlled and downward facing to prevent glare and nighttime light pollution.

Desired outcome: A visually cohesive and attractive urban environment that enhances the sense of place and integrates with the surrounding Kuils River landscape.

Socio-Economic Environment

- The development provides short-term employment and skills development opportunities for local labour during construction.
- The project contributes to social upliftment by delivering affordable housing, improving service access, and supporting local economic activity.
- Community grievances are addressed promptly through a transparent communication and complaints process.

Desired outcome: An inclusive and socially beneficial neighbourhood that contributes to economic opportunity, equitable housing access, and improved community well-being.

Waste Management and Pollution Control

- All construction and operational waste are segregated, recycled, and disposed of at licensed facilities.
- No waste, hazardous material, or hydrocarbons are discharged into stormwater or the Kuils River.
- The site remains free of illegal dumping through regular maintenance and enforcement.

Desired outcome: A clean and well managed development with minimal pollution, fully compliant with the National Environmental Management: Waste Act (2008).

Health, Safety, and Nuisance Management

- Construction-related dust, noise, and traffic are minimised through implementation of the EMPr's environmental controls.
- Workers operate under strict health and safety protocols compliant with the Occupational Health and Safety Act (1993).
- Operational safety is maintained through adequate lighting, signage, and pedestrian infrastructure.

Desired outcome: A safe and healthy living and working environment with negligible nuisance impacts on surrounding communities.

Heritage and Cultural Resources

- No heritage resources are affected; however, a chance-find procedure is implemented for any unexpected discoveries during excavation.

Desired outcome: Full compliance with the National Heritage Resources Act (Act 25 of 1999) and protection of any potential cultural material.

The implementation of the above measures will ensure that:

- All significant environmental risks are avoided or reduced to low levels.
- The aquatic and terrestrial ecosystems are protected and rehabilitated.
- The development supports climate resilience and resource efficiency; and
- The social and economic benefits of the project are realised without compromising environmental integrity.

Collectively, these outcomes represent the Best Practicable Environmental Option (BPEO) for the development of Farm 1388, Kuils River, ensuring a balance between sustainable urban growth, environmental protection, and community upliftment.

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

The findings of the Environmental Impact Assessment (EIA) and the associated specialist studies are conditional on the implementation of specific environmental management and design measures that must be formalised as conditions of Environmental Authorisation. These conditions are essential to ensure that the proposed development proceeds in an environmentally responsible, legally compliant, and sustainable manner.

Riparian Buffer and No-Go Area Protection

- A minimum 32-metre riparian buffer from the edge of the Kuils River shall be maintained as a permanent no-go area for all construction and infrastructure.
- This buffer must be demarcated on-site prior to construction, with fencing and signage indicating "No Entry – Environmental Protection Zone."
- The area must be rehabilitated and managed with indigenous riparian vegetation as per the recommendations of The Biodiversity Company (2025).

Floodline and Stormwater Infrastructure Compliance

- No development or permanent infrastructure may occur within the 1:100-year floodline, as delineated in the Engineering Floodline Assessment (2025).
- All stormwater management infrastructure (detention ponds, swales, and energy dissipating outfalls) must be constructed and maintained in accordance with the approved WSUD design to ensure attenuation to pre-development runoff rates.
- A Stormwater Management Maintenance Plan must be included in the EMPr and implemented for the operational phase.

Alien Vegetation Removal and Indigenous Rehabilitation

- All alien invasive vegetation within the site and particularly along the riparian corridor must be removed and controlled throughout construction and operation.
- Indigenous, waterwise plant species shall be used for landscaping and re-vegetation in open spaces, stormwater areas, and buffer zones.

Environmental Control and Oversight

- An Environmental Control Officer (ECO), independent of the contractor, must be appointed for the duration of the construction phase to monitor compliance with the EMPr and EA conditions.
- The ECO shall conduct regular site inspections, maintain compliance records, and submit monthly environmental audit reports to the competent authority.

Water Use Authorisation

- Should any aspect of the development (e.g., stormwater discharge structures, culverts, or erosion control works) fall within the definition of Section 21(c) and (i) water uses under the National Water Act (1998), a Water Use Authorisation or General Authorisation confirmation from the Department of Water and Sanitation (DWS) must be obtained prior to commencement of construction.

Traffic and Access Upgrades

- The developer must implement the road and intersection upgrades recommended in the Traffic Impact Assessment (Liezl Stodart, Pr. Eng., 2025) to the satisfaction of the City of Cape Town's Transport Directorate before occupation.
- Adequate pedestrian walkways, crossings, and traffic calming measures must be completed prior to handover to residents.

Waste and Pollution Management

- All construction and operational waste must be separated at source, with recyclable materials diverted from landfill where possible.
- Waste may only be transported and disposed of at licensed facilities in accordance with the National Environmental Management: Waste Act (2008).
- The storage of hazardous substances (fuels, lubricants, or chemicals) must comply with SANS 10263 and SANS 10228–10230 standards.

Construction Phase Management

- A Construction Environmental Management Plan (CEMP) must be implemented as part of the EMPr, addressing noise, dust, access, erosion, waste, and community safety controls.
- Construction working hours must be limited to 07:00–18:00 on weekdays and 08:00–13:00 on Saturdays, with no work permitted on Sundays or public holidays unless otherwise approved.
- All workers must receive environmental induction training before site activities commence.

Monitoring and Reporting Requirements

- A post-construction environmental compliance audit must be submitted to the competent authority within three months of completion of construction.
- The maintenance and monitoring of stormwater infrastructure and riparian rehabilitation areas must continue for a minimum of five years post-construction, with annual progress reports to the competent authority.

Climate Resilience and Sustainability Commitments

- The developer must ensure that all units and public infrastructure incorporate energy efficient fittings (e.g., LED lighting, solar ready electrical connections, low flow plumbing) to reduce carbon emissions and enhance climate resilience.

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

Based on the findings of the Environmental Impact Assessment (EIA), the specialist studies, and the outcomes of the site sensitivity verification, it is the professional opinion of the Environmental Assessment Practitioner (EAP) that the proposed mixed-use residential development on Remainder Farm 1388, Kuils River is environmentally acceptable, socially desirable, and economically feasible, and therefore should be authorised, subject to the implementation of the recommended mitigation and management measures outlined in this report and accompanying Environmental Management Programme (EMPr).

The assessment has confirmed that the site is highly transformed, located within the existing urban edge, and serviced by adequate municipal infrastructure, making it well suited to sustainable urban development. The Kuils River floodplain and associated riparian habitat represent the primary environmental constraint, and these have been completely excluded from the development footprint in accordance with the findings of The Biodiversity Company (2025). The project therefore avoids all high-sensitivity areas, complies with the National Water Act (1998), and supports the Western Cape Biodiversity Spatial Plan (WCBSP) objective of directing growth toward transformed land.

All identified environmental impacts can be avoided or reduced to low significance through the implementation of the prescribed mitigation measures, while the development will deliver notable positive socio-economic outcomes, including the provision of approximately 486 housing opportunities, local employment creation, and urban integration consistent with the City of Cape Town's Integrated Development Plan (IDP) and Municipal Spatial Development Framework (MSDF).

The EAP therefore concludes that the proposed development represents the Best Practicable Environmental Option (BPEO) for the site, achieving an appropriate balance between environmental protection, social upliftment, and economic viability.

Recommended Conditions of Authorisation

Should the competent authority decide to grant Environmental Authorisation, the following **conditions** are recommended to ensure environmental compliance and sustainability, and where applicable, these conditions will be included in the attached EMPr:

1. **No-go area and floodplain protection:**
   - A minimum 32 m riparian buffer from the Kuils River must be retained as a permanent no-go area for development.
   - All infrastructure must be located outside the 1:100-year floodline as delineated by the Engineering Floodline Assessment (2025).

2. **Stormwater and water quality management:**
   - Implement Water Sensitive Urban Design (WSUD) measures including detention ponds, vegetated swales, and litter traps to manage both stormwater quality and quantity.
   - A Stormwater Maintenance Plan must be incorporated into the operational phase EMPr.

3. **Rehabilitation and vegetation management:**
   - Undertake riparian rehabilitation using indigenous, waterwise vegetation and remove all alien invasive species from the property.
   - Maintain the rehabilitated buffer area through an ongoing five-year maintenance and monitoring programme.

4. **Environmental oversight:**
   - Appoint an independent Environmental Control Officer (ECO) for the full duration of construction.
   - The ECO must conduct regular inspections and submit monthly compliance reports to the competent authority.

5. **Water Use Authorisation:**
   - If required, obtain General Authorisation confirmation or Water Use Licence (WUL) from the Department of Water and Sanitation (DWS) for Section 21(c) and (i) water uses prior to construction.

6. **Traffic and infrastructure compliance:**
   - Implement all intersection upgrades and pedestrian safety improvements recommended in the Traffic Impact Assessment (2025) prior to occupation.
   - Ensure internal road design complies with City of Cape Town standards.

7. **Construction-phase controls:**
   - Implement the Construction Environmental Management Plan (CEMP) as part of the EMPr, addressing dust, noise, access, waste, and erosion management.

- Restrict working hours to 07:00–18:00 on weekdays and 08:00–13:00 on Saturdays, with no work on Sundays or public holidays unless authorised.

8. Waste and pollution management:

- Dispose of all construction and operational waste at licensed facilities in accordance with the National Environmental Management: Waste Act (2008).
- Prohibit any dumping or stockpiling within the buffer or floodplain area.

9. Monitoring and reporting:

- Submit a post-construction environmental compliance audit within three months of completion of construction.
- Conduct annual monitoring of stormwater infrastructure and riparian rehabilitation for at least five years post-construction.

10. Sustainability and efficiency measures:

- Install energy efficient LED lighting, solar ready connections, and low flow plumbing fixtures to promote water and energy conservation.

In the opinion of the EAP, the proposed development:

- Avoids areas of high environmental sensitivity.
- Incorporates effective mitigation and rehabilitation measures.
- Aligns with national, provincial, and municipal planning frameworks; and
- Promotes social and economic benefits in an environmentally responsible manner.

Accordingly, **it is recommended that the Environmental Authorisation be granted**, subject to the inclusion and enforcement of the above conditions, as these will ensure that the activity proceeds in accordance with the principles of sustainable development outlined in Section 2 of the National Environmental Management Act (Act No. 107 of 1998).

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

The Basic Assessment was undertaken using the best available environmental, technical, and spatial information at the time of compilation. The level of confidence in the findings is considered high; however, several inherent assumptions and minor uncertainties exist, which are typical of environmental assessments of this nature. The floodline delineation and stormwater modelling undertaken by The Biodiversity Company (2025) were based on current rainfall and hydrological datasets. Although a safety factor was applied, future climate change variability, such as increases in rainfall intensity or frequency, may influence surface water dynamics and stormwater discharge patterns.

No site-specific groundwater investigation was undertaken, as the proposed development is located within a fully serviced municipal area and is not dependent on groundwater abstraction. Groundwater depth and connectivity to the Kuils River were therefore inferred from regional hydrogeological data. Should groundwater be intercepted during construction, additional mitigation and containment measures will be implemented in accordance with the EMPr.

The terrestrial and aquatic biodiversity assessments were conducted within a highly transformed environment that is largely devoid of natural vegetation or undisturbed habitat. It is assumed that the limited presence of indigenous flora and fauna accurately represents current conditions, although isolated faunal movement along the riparian corridor cannot be entirely excluded. A chance find protocol will therefore apply during construction. Socio-economic data were derived primarily from the 2011 Census and the City of Cape Town Suburb Profile (Kuils River), which, while the most recent official dataset, may not

fully reflect recent demographic shifts. Nonetheless, this does not materially affect the conclusions regarding the project's need and desirability.

The cumulative impact assessment is constrained by the limited availability of detailed information on other future developments in the immediate area. However, as the site lies within the urban edge and is served by existing municipal infrastructure, cumulative impacts are anticipated to remain low and manageable. The success of mitigation and rehabilitation measures particularly those concerning stormwater infrastructure, alien plant management, and riparian rehabilitation depends on their ongoing implementation and maintenance by the developer, the appointed Environmental Control Officer (ECO) during construction, and ultimately the City of Cape Town or relevant homeowners' association during operation.

Finally, it is assumed that all specialist studies were undertaken by appropriately qualified professionals using recognised methods and current datasets, including the Western Cape Biodiversity Spatial Plan (WCBSP 2017), National Freshwater Ecosystem Priority Areas (NFEPA), and National Spatial Biodiversity Assessment (NSBA 2018). The information supplied by the applicant and specialists is regarded as accurate and representative of existing site conditions. These minor uncertainties do not materially affect the confidence or reliability of the assessment. The data, assumptions, and mitigation measures presented are considered sufficient and robust to enable informed environmental decision making and ensure that residual risks remain within acceptable environmental thresholds.

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

Aspect	**Description**
Period for which the Environmental Authorisation (EA) is required	10 years, to allow for phased implementation of the housing development and to accommodate potential delays in approvals, financing, and construction.
Anticipated date of activity conclusion (construction phase)	Approximately 4 years from commencement of construction, subject to phasing and market conditions.
Post-construction monitoring period	Minimum of 2 years post-construction, during which stormwater infrastructure, landscaping, ecological buffers, and rehabilitation measures must be monitored for compliance and effectiveness.
Finalisation of monitoring requirements	At the end of the 2-year monitoring period, subject to submission of a final compliance and closure report to the competent authority confirming that all rehabilitation and mitigation measures are functioning as intended.

3. Water

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

Given that the Western Cape is a water scarce region and subject to recurring drought conditions, the proposed development has been designed to minimise the use of potable water and promote efficient, sustainable water management throughout both the construction and operational phases.

During the construction phase, the contractor will utilise non-potable water sources such as treated effluent from approved municipal facilities, captured stormwater, or borehole water from licensed supply points, where available for dust suppression, concrete mixing, and general site cleaning. Potable water use will be restricted solely to essential activities such as drinking and

sanitation. All water use during construction will comply with the City of Cape Town's Water By-law (2010) and the National Water Act (1998), and usage records will be maintained to demonstrate compliance and conservation performance.

During the operational phase, the development will incorporate a range of Water Conservation and Water Demand Management (WC/WDM) measures in line with the City of Cape Town's Water Strategy (2019) and the Western Cape Sustainable Water Management Plan, including:

- Installation of low flow taps, dual flush toilets, and water efficient showerheads in all residential and business units.
- Provision for rainwater harvesting tanks to capture and store roof runoff for use in garden irrigation, car washing, and cleaning.
- Design of a non-potable irrigation system that draws from stormwater detention ponds or collected greywater, thereby reducing reliance on potable supply.
- Implementation of drought tolerant and indigenous landscaping (xeriscaping) within open spaces and the riparian buffer to significantly reduce irrigation demand.
- Incorporation of smart water meters (where feasible) to detect leaks, monitor consumption, and encourage user accountability.
- Maintenance of the detention ponds and swales to allow for stormwater infiltration and limited groundwater recharge, improving local water balance.
- Promotion of resident awareness campaigns and Homeowners' Association (HOA) guidelines encouraging responsible water use, leak reporting, and compliance with municipal water restrictions.

These combined measures will ensure that potable water demand is minimised, non-potable water reuse is prioritised, and long-term water sustainability is achieved for the development. The approach aligns with the City of Cape Town's Integrated Water Management principles and supports regional resilience against future water shortages.

4. Waste

Explain what measures have been taken to reduce, reuse or recycle waste.

Comprehensive waste management measures have been incorporated into the planning, construction and operational phases of the proposed development to support the principles of waste avoidance, minimisation, reuse, and recycling in line with the National Environmental Management: Waste Act (Act No. 59 of 2008) and the City of Cape Town Integrated Waste Management By-law (2019).

During the construction phase, all contractors will be required to implement a Construction Waste Management Plan that prioritises waste separation at source. Waste will be sorted into categories such as inert rubble, metals, wood, plastic, and general waste. Reusable materials (e.g., bricks, concrete, and timber off cuts) will be reused onsite where feasible for backfilling or temporary works, while recyclables will be collected by licensed recycling contractors. Only residual, non-recyclable waste will be disposed of at a licensed landfill facility. Excavated topsoil will be stockpiled separately and reused for landscaping and rehabilitation. Hazardous substances such as oils, solvents, and paint residues will be stored in bunded areas and disposed of via approved hazardous waste facilities.

During the operational phase, the development will promote separation of waste at household and commercial level through the provision of clearly marked recycling containers for glass, paper, plastic, and metal. The appointed waste removal service provider will transport recyclables to City approved materials recovery facilities (MRFs), ensuring that the volume of waste sent to landfill is reduced. Organic waste generated from gardens and landscaping will be composted onsite or collected separately for processing at municipal composting facilities.

Educational signage and resident awareness programmes will be implemented by the Homeowners' Association (HOA) to encourage continued compliance with recycling and waste reduction initiatives. All waste handling and storage areas will be hard surfaced, bunded, and screened to prevent contamination of soil or stormwater systems.

5. Energy Efficiency

8.1.	Explain what design measures have been taken to ensure that the development proposal will be energy efficient.

The proposed development has been designed to incorporate a range of energy efficient and sustainable design measures that will reduce overall electricity demand, lower greenhouse gas emissions, and enhance long term environmental performance. These measures are consistent with the City of Cape Town's Energy and Climate Change Action Plan, the National Energy Efficiency Strategy, and the principles of sustainable urban design.

All residential and commercial buildings will be designed in accordance with the SANS 10400-XA: Energy Usage in Buildings standards, which promote thermal efficiency and reduced energy consumption. Buildings will feature north oriented facades where possible to maximise natural daylight and passive solar heating during winter while minimising heat gain in summer. The use of roof overhangs, pergolas, and energy efficient glazing will further enhance temperature regulation and reduce reliance on artificial cooling.

The development will be equipped with energy efficient LED lighting for all public areas, roads, and open spaces, using downward facing luminaires to reduce light pollution and energy waste. Electrical infrastructure has been designed to allow for future integration of solar photovoltaic (PV) systems on residential and business rooftops, and solar ready conduits will be installed during construction to facilitate easy retrofitting. Where feasible, solar water heating systems or heat pumps will be encouraged in residential units to further reduce electricity consumption.

To reduce overall operational demand, energy efficient technologies such as motion sensor lighting in common areas, smart metering, and low voltage equipment will be incorporated into the design. Landscaping will utilise indigenous, low maintenance plant species, which reduce the need for energy intensive irrigation and maintenance.

SECTION K: DECLARATIONS

DECLARATION OF THE APPLICANT

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

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

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;

- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;

- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;

- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;

- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
  - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - Legitimate costs in respect of specialist(s) reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;

- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

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

Signature of the Applicant: Date:

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I ……, EAP Registration number …….. as the appointed EAP hereby declare/affirm the correctness of the:

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

Signature of the EAP: Date:

Name of company (if applicable):