



**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:	

**THE PROPOSED DEVELOPMENT OF APROXIMATELY 324 LOW INCOME HOMES IN VREDENBURG, SALDANHA BAY, SALDANHA BAY MUNICIPALITY, WESTERN CAPE.**

The proposed development entails the establishment of a low-income housing development, a comprehensive project that envisions approximately 324 residential homes. This project encompasses not only the residential areas but also the essential services and road infrastructure required for a fully functional and sustainable community. The planned development is expected to occupy around 8.2575 hectares of land, ensuring a substantial footprint for a thriving neighbourhood.

In terms of infrastructure, the necessary service components, such as stormwater and sewage systems, have been strategically positioned within the proposed internal roads of the development. This placement optimizes space utilization and enhances the overall efficiency of the service infrastructure. The designed diameter for these vital service components is 350 mm, emphasizing a focus on precision in the development planning.

For precise location identification, the midpoint coordinates of the site are denoted as 32.922587°S latitude and 18.030618°E longitude. The site is situated within Ward 9 of the Saldanha Bay Municipality and will cover areas of Erf No 8270 and Portion 4 of Farm 132. In embracing such comprehensive planning, the project aims not only to address the housing needs of the community but also to foster a sustainable and well-integrated living environment.

## 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, 1998 (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](mailto: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](mailto: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: <b>DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1)</b> (City of Cape Town, West Coast District, Cape Winelands District & Overberg District)	<b>GEORGE REGIONAL OFFICE:</b> <b>DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 3)</b> (Central Karoo District & Garden Route District)
<p>The completed Form must be sent via electronic mail to: <a href="mailto:DEADPEIAAdmin@westerncape.gov.za">DEADPEIAAdmin@westerncape.gov.za</a></p> <p>Queries should be directed to the Directorate: Development Management (Region 1) at: E-mail: <a href="mailto:DEADPEIAAdmin@westerncape.gov.za">DEADPEIAAdmin@westerncape.gov.za</a> Tel: (021) 483-5829</p> <p>Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1) Private Bag X 9086 Cape Town, 8000</p>	<p>The completed Form must be sent via electronic mail to: <a href="mailto:DEADPEIAAdmin.George@westerncape.gov.za">DEADPEIAAdmin.George@westerncape.gov.za</a></p> <p>Queries should be directed to the Directorate: Development Management (Region 3) at: E-mail: <a href="mailto:DEADPEIAAdmin.George@westerncape.gov.za">DEADPEIAAdmin.George@westerncape.gov.za</a> Tel: (044) 814 2006</p> <p>Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530</p>

## MAPS

<b>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.</b>	
Locality Map:	<p>The scale of the locality map must be at least 1:50 000.</p> <p>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.</p> <p>The map must indicate the following:</p> <ul style="list-style-type: none"> <li>• an accurate indication of the project site position as well as the positions of the alternative sites, if any;</li> <li>• road names or numbers of all the major roads as well as the roads that provide access to the site(s)</li> <li>• a north arrow;</li> <li>• a legend; and</li> <li>• a linear scale.</li> </ul> <p>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.</p> <p>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.</p>
<b>Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.</b>	
Site Plan:	<p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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 <b>must</b> be clearly indicated on the site plan.</li> <li>• Servitudes and an indication of the purpose of each servitude must be indicated on the site plan.</li> <li>• Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): <ul style="list-style-type: none"> <li>○ Watercourses / Rivers / Wetlands</li> <li>○ Flood lines (i.e., 1:100 year, 1:50 year and 1:10 year where applicable);</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>o Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&amp;DP"):</li> <li>o Ridges;</li> <li>o Cultural and historical features/landscapes;</li> <li>o Areas with indigenous vegetation (even if degraded or infested with alien species).</li> </ul> <ul style="list-style-type: none"> <li>• Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted.</li> <li>• North arrow</li> </ul> <p>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.</p>
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 <b>Appendix C</b> . 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 <b>Appendix D</b> .
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 <b>Appendix A3</b> .

## 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	✓
	Appendix E3:	Final Comment from the DWS	No comment received
	Appendix E4:	Comment from the DEA: Oceans and Coast	N/A
	Appendix E5:	Comment from the DAFF	N/A
	Appendix E6:	Comment from WCG: Department of Infrastructure – Road Use Management	✓
	Appendix E7:	Comment from WCG: DoA	No comment received

	<b>Appendix E8:</b>	<b>Comment from WCG: DHS</b>	No comment received
	<b>Appendix E9:</b>	<b>Comment from WCG: DoH</b>	No comment received
	<b>Appendix E10:</b>	<b>Comment from DEA&amp;DP: Pollution Management</b>	No comment received
	<b>Appendix E11:</b>	<b>Comment from DEA&amp;DP: Waste Management</b>	No comment received
	<b>Appendix E12:</b>	<b>Comment from DEA&amp;DP: Biodiversity</b>	No comment received
	<b>Appendix E13:</b>	<b>Comment from DEA&amp;DP: Air Quality</b>	No comment received
	<b>Appendix E14:</b>	<b>Comment from DEA&amp;DP: Coastal Management</b>	N/A
	<b>Appendix E15:</b>	<b>Comment from the local authority</b>	No comment received
	<b>Appendix E16:</b>	<b>Confirmation of all services (water, electricity, sewage, solid waste management)</b>	✓
		<b>Comment from Eskom</b>	
	<b>Appendix E17:</b>	<b>Comment from the District Municipality</b>	No comment received
	<b>Appendix E18:</b>	<b>Copy of an exemption notice</b>	<b>x</b>
	<b>Appendix E19</b>	<b>Pre-approval for the reclamation of land</b>	<b>x</b>
	<b>Appendix E20:</b>	<b>Proof of agreement/TOR of the specialist studies conducted.</b>	<b>x</b>
	<b>Appendix E21:</b>	<b>Proof of land use rights</b>	✓
	<b>Appendix E22:</b>	<b>Proof of public participation agreement for linear activities</b>	<b>x</b>
	<b>Appendix E23:</b>	<b>Comment from DEAD&amp;DP: Region 1</b>	✓
<b>Appendix F:</b>	<b>Public participation information: including a copy of the register of I&amp;APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.</b>	<b>Appendix F1: Registered I&amp;AP's</b>	✓
		<b>Appendix F2: Newspaper Advert</b>	
		<b>Appendix F3: Notification Letters</b>	
		<b>Appendix F4: Notification Emails</b>	
		<b>Appendix F5: Site Notice</b>	
		<b>Appendix F6: Comments &amp; Response Table</b>	
<b>Appendix G:</b>	<b>Specialist Report(s)</b>	<b>Appendix G1:</b>	<b>Animal Species Compliance Statement</b>
			✓

		Appendix G1:	Peer review of Animal Species Compliance Statement	
		Appendix G2:	Aquatic Biodiversity Statement & DWS Matrix (Enviro-EAP)	
		Appendix G2:	Aquatic Biodiversity Compliance Statement (Enviro-Swift)	
		Appendix G3:	Plant Species Compliance Statement	
		Appendix G4:	Terrestrial Biodiversity Compliance Statement	
		Appendix G5:	Agriculture Compliance Statement	
		Appendix G6:	Geotechnical Report	
		Appendix G7:	Visual Impact Assessment	
		Appendix G8:	Traffic Impact Assessment	
		Appendix G9:	SACNASP appointed Specialist	
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			✓
Appendix L:	EA Approval (Past) for Portion 4 of Farm No. 132			✓

## SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE: REGION 1		GEORGE OFFICE: REGION 3
	(City of Cape Town, West Coast District)	( <del>Cape Winelands District &amp; Overberg District</del> )	( <del>Central Karoo District &amp; Garden Route District</del> )
<b>Duplicate this section where there is more than one Proponent</b> Name of Applicant/Proponent: Name of contact person for Applicant/Proponent (if other): Company/ Trading name/State Department/Organ of State: Company Registration Number: Postal address: Telephone: E-mail:	Saldanha Bay Municipality		
	Heinrich Mettler		
	Saldanha Bay Municipality		
	N/A		
	Municipal Offices, Private Bag X12		
	Vredenburg		Vredenburg
	+27(0) 22 701 7000		Fax: +27(0) 22 701 7000
	Heinrich.Mettler@sbm.gov.za		
	Company of EAP:	Sillito Environmental Consulting	
	EAP names:	Jonathan Lassen & Chantel Müller	
Postal address:	Suite 401, Tokai on Main		
	2 Burchell Road, Tokai, 7945		
Telephone:	(021) 712 5060		
E-mail:	<a href="mailto:chantel@environmentalconsultants.co.za">chantel@environmentalconsultants.co.za</a>		
Qualifications:	<b>Compiled by:</b> Jonathan Lassen – Advanced Diploma in Marine Sciences (Cape Peninsula University of Technology) (Candidate EAP – 2024/8038)		
	<b>Reviewed by:</b> Chantel Muller- M Phil in Environmental Management (2008) BA in Social Dynamics (2004) (Registered EAP – 2019/1362)		
EAP registration no:	Chantel Muller: 2019/1362, Jonathan Lassen: 2024/8038		
<b>Duplicate this section where there is more than one landowner</b> Name of landowner: Name of contact person for landowner (if other): Postal address: Telephone: E-mail:	<b>Same as Applicant</b>		
	Tel:		Fax:
Name of Person in control of the land: Name of contact person for person in control of the land: Postal address: Telephone: E-mail:	<b>Same as Applicant</b>		
			Postal code:
	( )		Cell: Fax: ( )
<b>Duplicate this section where there is more than one Municipal Jurisdiction</b> Municipality in whose area of jurisdiction the proposed activity will fall: Contact person: Postal address: Telephone: E-mail:	Saldanha Bay Municipality		
	Lindsey Gaffley		
	Municipal Offices, Private Bag X12		
	Vredenburg		Vredenburg
	+27(0) 22 701 7114		Fax: +27(0) 22 701 7114
	<a href="mailto:lindsey.gaffley@sbm.gov.za">lindsey.gaffley@sbm.gov.za</a>		

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

1.	Is the proposed development (please tick):	New	X	Expansion	
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				
A Brownfield site may be defined as a previously developed site that (i) is not currently in use, and (ii) may potentially be contaminated, whilst a Greenfield site currently undeveloped. Based on this definition, the site is greenfield as although the site was previously transformed from its natural state, the site has not yet been developed.					
3.	<b>For Linear activities or developments</b>				
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:				—m <sup>2</sup>
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.	SC Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives				
3.6.	<b>Starting point co-ordinates for all alternatives</b>				
	Latitude (S)	°	'	"	
	Longitude (E)	°	'	"	
	<b>Middle point co-ordinates for all alternatives</b>				
	Latitude (S)	°	'	"	
	Longitude (E)	°	'	"	
	<b>End point co-ordinates for all alternatives</b>				
	Latitude (S)	°	'	"	
	Longitude (E)	°	'	"	
<b>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.</b>					
4.	<b>Other developments</b>				
4.1.	Property size(s) of all proposed site(s):				172.47 ha
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):				N/A
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:				8.2575 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 development encompasses the establishment of low-income housing on Erf 8270 and Portion 4 of Farm 132, Vredenburg, comprising of the following:					
<ul style="list-style-type: none"> <li>• Approximately 324 Residential Zone IV erven (UISP) with an average size of 100m<sup>2</sup></li> <li>• 6 Open Space Zone 1 erven,</li> <li>• 1 Institutional Zone II (Church) erf and</li> <li>• 1 Institutional Zone I (Creche) erf;</li> </ul> along with the necessary services and road infrastructure.					
The overall development area is estimated to cover around 8.2575 hectares.					
Essential service facilities, including stormwater and sewage systems, will be situated within the road reserve of the planned internal roads of the proposed development. The mandated service infrastructure is designed with a diameter of less than 350 mm.					

**Road Infrastructure:**

Approximately 2,800 meters of asphalt roads will be constructed, with widths ranging between 5.0 m and 5.5 m, depending on the width of the road reserve. Along all roads, 1.0 m wide sidewalks made of gravel will be provided. The internal roads are classified as residential Class 5 roads, with road reserve widths ranging from 13 m to 10 m. All road markings, traffic signs, and materials will comply with the Southern African Development Community Road Traffic Sign Manual (SARTSM), 1997. Road markings will be applied using road marking paint, and all traffic signs will feature reflective surfaces. The internal road network will link to nearby residential areas via Kootjieskloof Road, with an additional connection at the western edge of the development to an unnamed road.

Traffic impacts associated with the proposed development were assessed through a Traffic Impact Assessment (Appendix G8), which confirmed that the surrounding road network will operate at acceptable Levels of Service.

**Water Reticulation Infrastructure:**

Approximately 2 500 m of water pipelines will be constructed, together with all required specials. Each erf will be serviced with a house connection and water meter. Fire hydrants will be installed at such locations to ensure coverage of the entire development.

**Sewerage Reticulation Infrastructure:**

Approximately 2 500 m of sewer pipelines will be constructed. All erven will receive a house connection point. This point will be located at such a position to ensure that at least 70 % of the erf can drain towards and connect at this point.



**Figure 1: The location of the proposed development site (study site). The property borders are indicated in red. Please refer to appendices for the Locality Map and the proposed site layout plans.**

**Project Location:**

The site (previously transformed from its natural state) is situated within Ward 9 of the Saldanha Bay Municipality at the following mid-point co-ordinates: 32.922587°S 18.030618°E.

No site alternatives were considered for this proposed development, as it is the only site available to the applicant (Saldanha Bay Municipality) for low-income housing development.

4.5.	Indicate how access to the proposed site(s) will be obtained for all alternatives.			
Access to the site is gained via the Kootjieskloof Street, located East of the site.				
4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C0460000000013200004 (P4 F132) and C04600140000827000000 (Erf 8270)		
4.7.	Coordinates of the proposed site(s) for all alternatives:			
	Latitude (S)	°32	'55	"21.31
	Longitude (E)	°18	'01	"50.23

## 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
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### 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.
<ul style="list-style-type: none"> <li>National Environmental Management Act, Act No. 107 of 1998 (NEMA)</li> <li>Spatial Planning Land Use Management Act 16 of 2013</li> </ul>

### 4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.
<ul style="list-style-type: none"> <li>Western Cape Spatial Development Framework (PSDF), 2014</li> <li>DEA Integrated Environmental Management Guideline Series, Guideline 5: Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations.</li> </ul>

### 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.
<p>The following guidelines were utilised to ensure all the requirements regarding the consideration of alternatives, public participation, and procedures to assess the need and desirability were assessed and inquired. These guidelines were considered during the Draft BAR and preparation of this report:</p> <ul style="list-style-type: none"> <li>Guideline Document, EIA Regulations, Implementation of Sections 21, 22 and 26 of the Environment Conservation Act, 1998</li> <li>DEA Integrated Environmental Management Guideline Series, Guideline 3: General Guide to the Environmental Impact Assessment Regulations, 2006</li> <li>DEA Integrated Environmental Management Guideline Series, Guideline 5: Companion to the Environmental Impact Assessment Regulations, 2012</li> <li>DEA&amp;DP Guideline Document: Guideline on Alternatives, March 2013</li> <li>DEA&amp;DP Guideline Document: Guideline on Public Participation, March 2013</li> <li>DEA&amp;DP Guideline Document: Guideline on Need and Desirability, March 2013</li> <li>DEA&amp;DP Guideline for determining the scope of specialist involvement in the EIA process, June 2005</li> <li>DEA&amp;DP Guideline for the review of specialist input in the EIA process, June 2005</li> <li>DEA Integrated Environmental Management Guideline Series, Guideline 4: Public Participation in support of the Environmental Impact Assessment Regulations, 2006</li> <li>DEA Integrated Environmental Management Guideline Series, Guideline 5: Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations, 2006</li> </ul>

- DEA Companion to the NEMA EIA Regulations of 2010

## 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

The sensitivities identified in the Site Screening Tool Report, attached as **Appendix I1**, were as follows:

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

The following themes, for which protocols were legislated on the 20th of March 2020, have been identified in the **DEA Screening Tool Report** (attached as **Appendix I1**):

No	Theme	DEA Sensitivity	Agree / Disagree	Proposed Sensitivity	Motivation
1	Agriculture Theme	Medium Sensitivity	Disagree	Low Sensitivity	Although previously used for Agriculture, the site has been acquired by the Saldanha Bay Municipality and has been ear-marked for low-income housing, as indicated in the latest Municipal Spatial Development Plan. The relevant properties will not be used for agricultural activities again. The proposed development will also not impact any surrounding agricultural activities. The rating should therefore be Negligible.
2	Animal Species Theme	Low Sensitivity	Agree	N/A	The site has been previously transformed from its natural state for agriculture. The surrounding areas have also been transformed from their natural state and are used for low-income housing. The study site is therefore highly unlikely to contain any sensitive animal species. Therefore, based on factors outlined above, the EAP agrees with the theme sensitivity.
3	Aquatic Biodiversity Theme	Low Sensitivity	Agree	N/A	There are not any aquatic resources located within the study site. The study site is not located within 32 m of the edge of any water courses. The proposed development is therefore highly unlikely to impact on any aquatic resources. The EAP agrees with the theme sensitivity.
4	Archaeological and Cultural	Low Sensitivity	Agree	N/A	The site has been transformed from its natural state and is located within an area ear-marked for low-income housing. The surrounding areas

	Heritage Theme				have already been transformed for the same purpose. The site is not located in close proximity to any sensitive heritage resources. The EAP agrees with the theme sensitivity.
5	Civil Aviation Theme	High Sensitivity	Disagree	Negligible	Although the area is located within an area with a high Civil Aviation sensitivity, the proposed development will not have any impact on this. The rating should therefore be Negligible.
6	Defence Theme	Medium Sensitivity	Disagree	Negligible	Although the area is located within an area with a Medium Defence sensitivity, the proposed development will not have any impact on this. The rating should therefore be Negligible.
7	Paleontological Theme	Very High Sensitivity	Disagree	Low Sensitivity	About half of the study site is indicated to have a very high Paleontological sensitivity whilst the remaining area is located as having a low sensitivity. No Paleontological resources were found during the development of the surrounding areas. It is therefore unlikely that the study site will contain such resources. The rating should therefore be a low sensitivity.
8	Plant Species Theme	Medium Sensitivity	Disagree	Low Sensitivity	The study site is indicated to contain Saldanha Flats Strandveld, which is an Endangered vegetation type. However, as mentioned above, the site has been transformed from its natural state. Additionally, from the site visit it's evident that the site is severely degraded through previous agricultural activities and anthropogenic impacts such as illegal dumping. It's therefore unlikely that sensitive plants species, typically associated with the vegetation type will be found on site. Geophytes and annual herbaceous plants, typically associated with Saldanha Flats Strandveld were not observed during the site visit. The rating should therefore be a low sensitivity.
9	Terrestrial Biodiversity Theme	Very High Sensitivity	Disagree	Low Sensitivity	The reason for the Very High Sensitivity is because the study site is indicated to be within an Ecological Support Area (ESA) and Critical Biodiverse Area (CBA) and contains an Endangered Vegetation type (Saldanha Flats Strandveld). As discussed above the site has been previously transformed and is severely degraded through anthropogenic activities. With the site being in a degraded state, it's not in a functional state, thereby offering little in terms of ecological support. With the study site being located within an area ear-marked for development and with current anthropogenic impacts/ pressure through the surrounding low-income housing experienced on site, the site will unlikely ever be restored to a functioning state. The site is also not located near any protected area or an area containing intact indigenous vegetation. The proposed development will therefore have little impact on the Terrestrial Biodiversity in the area. The sensitivity rating should be low sensitivity.

**The following specialists studies were conducted and incorporated into this Draft BAR Application:**

1. Visual Impact Assessment
2. Animal Species Compliance Statement (Peer Reviewed)
3. Aquatic Biodiversity Compliance Statement (Enviro-Swift)
4. Plant Species Compliance Statement
5. Terrestrial Biodiversity Compliance Statement

6. Agriculture Compliance Statement

**Protocols:**

The proposed development complies fully with the applicable requirements of the specialist assessment protocols, as outlined below.

In accordance with the requirements for aquatic biodiversity, the screening tool initially identified the site as having a low sensitivity, which was subsequently verified through site sensitivity verification. Following engagement with the competent authority, an additional Aquatic Biodiversity Compliance Statement was undertaken by EnviroSwift, a suitably qualified and SACNASP-registered aquatic specialist, to ensure full compliance with the gazetted aquatic biodiversity assessment protocol. This verification confirmed that the site is of low sensitivity for aquatic biodiversity. Consequently, an Aquatic Biodiversity Compliance Statement was submitted in line with section 1.1.2 of the protocol. The statement, appended to the Basic Assessment Report, includes all required information such as the specialist's details, SACNASP registration, a signed declaration of independence, site inspection details, methodology, and a baseline description of aquatic ecosystems. The statement concludes that the proposed development will not have a significant impact on aquatic features, thereby meeting the requirements of section 3 of the protocol.

For terrestrial animal species, the screening tool and site sensitivity verification concluded that the site is of low sensitivity. A Terrestrial Animal Species Compliance Statement was therefore submitted in accordance with section 5.2 of the protocol. The compliance statement was originally prepared by Enviro-EAP, a SACNASP-registered ecological specialist, and was subsequently subjected to an independent peer review by a suitably qualified faunal specialist. Following the peer review, the Animal Species Compliance Statement was updated to address protocol compliance requirements. The peer-reviewed and updated statement confirms the absence of Species of Conservation Concern (SCC), includes all required elements such as site inspection details, methodology, assumptions and a declaration of independence, and confirms that no significant impact on terrestrial fauna is anticipated. The relevant information has been incorporated into the Basic Assessment Report.

Regarding terrestrial plant species, site sensitivity verification confirmed that the development site is of low sensitivity, and therefore a Terrestrial Plant Species Compliance Statement was submitted in line with section 1.3 of the protocol. The statement confirmed the absence or unlikely presence of SCC and was supported by a specialist site inspection conducted in accordance with the Species Environmental Assessment Guideline. The compliance statement satisfied all minimum content requirements and was appended to the Basic Assessment Report.

With respect to terrestrial biodiversity, the screening tool classification and site verification identified the site as having low sensitivity, necessitating a Terrestrial Biodiversity Compliance Statement. The statement, compiled by a SACNASP-registered ecological specialist, verified the sensitivity level, described the baseline biodiversity profile, provided assessment methodology and outcomes, and confirmed that the proposed development would not adversely affect terrestrial biodiversity. All required information and statements were provided in accordance with section 4 of the protocol.

Finally, in terms of agricultural resources, the site was identified as being of low sensitivity. An Agricultural Compliance Statement was submitted in accordance with section 1.3 of the protocol. This statement was compiled by a SACNASP-registered soil scientist or agricultural specialist and confirmed that the proposed development would not result in an unacceptable impact on the agricultural production capability of the land. It included a sensitivity map with the 50 m buffer, a description of micro-siting efforts to minimise disturbance, a professional recommendation, and the necessary supporting documentation, all appended to the Basic Assessment Report.

**SECTION D: APPLICABLE LISTED ACTIVITIES**

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant <b>Basic Assessment Activity(ies)</b> as set out in <b>Listing Notice 1</b>	Describe the portion of the proposed development to which the applicable listed activity relates.
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: <ul style="list-style-type: none"> <li data-bbox="491 1778 979 1879">(i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or</li> <li data-bbox="491 1888 979 1998">(ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for</li> </ul>	Although the site is located inside the Municipality's Urban Edge, as indicated in the latest SDP, the site was used for agricultural related activities post 1 April 1998 and the development footprint will exceed 5 Ha, which is more than the threshold for this Listed Activity.  Therefore, this Listed Activity <b>will be triggered</b> by the proposed development.

	residential, mixed, retail, commercial, industrial or institutional purposes.	
Activity No(s):	Provide the relevant <b>Basic Assessment Activity(ies)</b> as set out in <b>Listing Notice 3</b>	Describe the portion of the proposed development to which the applicable listed activity relates.
<b>Note:</b> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>		

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

Activity No(s):	Provide the relevant <b>Basic Assessment Activity(ies)</b> as set out in <b>Category A</b>	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 <b>Listed Activity(ies)</b>	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.
<p>The proposed development encompasses the establishment of low-income housing on Erf 8270 and Portion 4 of Farm 132, Vredenburg, comprising of the following:</p> <ul style="list-style-type: none"> <li>Approximately 324 Residential Zone IV erven (UISP) with an average size of 100m<sup>2</sup></li> <li>6 Open Space Zone 1 erven,</li> <li>1 Institutional Zone II (Church)erf and</li> <li>1 Institutional Zone I (Creche) erf;</li> </ul> <p>along with the necessary services and road infrastructure.</p> <p>The overall development area is estimated to cover around 8.2575 hectares.</p> <p>Approximately 2,800 meters of asphalt roads will be constructed, with widths ranging between 5.0 m and 5.5 m, depending on the width of the road reserve. Along all roads, 1.0 m wide sidewalks made of gravel will be provided. The internal roads are classified as residential Class 5 roads, with road reserve widths ranging from 13 m to 10 m. All road markings, traffic signs, and materials will comply with the Southern African Development Community Road Traffic Sign Manual (SARTSM), 1997. Road markings will be applied using road marking paint, and all traffic signs will feature reflective surfaces. The internal road network will link to nearby residential areas via Kootjieskloof Road, with an additional connection at the western edge of the development to an unnamed road.</p> <p>Approximately 2 500 m of water pipelines will be constructed, together with all required specials. Each erf will be serviced with a house connection and water meter. Fire hydrants will be installed at such locations to ensure coverage of the entire development.</p> <p>Approximately 2 500 m of sewer pipelines will be constructed. All erven will receive a house connection point. This point will be located at such a position to ensure that at least 70 % of the erf can drain towards and connect at this point.</p> <p>Essential service facilities, including stormwater and sewage systems, will be situated within the road reserve of the planned internal roads of the proposed development. The mandated service infrastructure is designed with a diameter of less than 350 mm.</p>	

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.
<p>The site is currently zoned as Agriculture. A rezoning application is being undertaken in order to sub-divide and rezone the site as follows:</p> <ul style="list-style-type: none"> <li>• Approximately 324 Residential Zone IV erven (UISP) with an average size of 100m<sup>2</sup></li> <li>• 6 Open Space Zone 1 erven,</li> <li>• 1 Institutional Zone II (Church)erf and</li> <li>• 1 Institutional Zone I (Creche) erf;</li> </ul> <p>along with the necessary services and road infrastructure.</p>	
3.	Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved.
N/A	
4.	Explain how the proposed development will be in line with the following?
4.1	The Provincial Spatial Development Framework.
<p>The proposed development is consistent with the policy directives and principles of the Western Cape Provincial Spatial Development Framework (PSDF, 2014). The project supports settlement restructuring and spatial integration by establishing a higher-density residential area (average erf size of 100 m<sup>2</sup>) within the existing urban footprint of Vredenburg. This avoids leapfrog development and urban sprawl while ensuring integration with adjacent neighbourhoods through direct road linkages to Kootjieskloof Road and the surrounding street network. The inclusion of 324 Residential Zone IV erven (UISP), along with institutional erven for a church and crèche, directly addresses the PSDF's objective of creating sustainable and inclusive human settlements. By embedding community facilities within the development and providing pedestrian-friendly infrastructure such as sidewalks, the layout promotes equitable access to social services and non-motorised transport options.</p> <p>From an infrastructure led growth perspective, the development aligns with PSDF principles by utilising appropriately designed service infrastructure located within road reserves, which ensures cost-effective provision, long-term maintenance efficiency, and compliance with municipal standards. Roads, traffic signage, and markings will conform to the Southern African Development Community Road Traffic Sign Manual (SARTSM), ensuring safety and functionality. Environmental sustainability is further supported through the provision of six Open Space Zone 1 erven, which will contribute to ecological resilience, stormwater management, and recreational opportunities for residents. The compact form of the development optimises land use, reduces long-term infrastructure costs, and limits unnecessary land disturbance.</p> <p>In terms of socio-economic benefits, the project contributes to local employment creation during the construction phase, while the provision of affordable housing enhances labour market participation by enabling low-income households to reside closer to employment opportunities in Vredenburg and the wider Saldanha Bay area. Collectively, the development gives effect to the core PSDF (2014) objectives by promoting inclusive and sustainable settlement patterns, ensuring efficient infrastructure provision, supporting resource efficiency, and strengthening socio-economic opportunities within the region.</p>	
4.2	The Integrated Development Plan of the local municipality.
<p>The developable area is located within the urban edge of Vredenburg and identified for human settlement development in the IDP, SDF and HSP of Saldanha Bay. Supporting uses are located within walking distances and the development provides erven for a crèche and church. Economic opportunities are provided in the existing community.</p>	
4.3.	The Spatial Development Framework of the local municipality.
<p>Saldanha Bay SDF (review 2019) identified the area of the development area 22, which is earmark for residential development. Integration will take place where existing streets link up to the new development and social and economic services will be shared. There are no social housing proposed.</p>	
4.4.	The Environmental Management Framework applicable to the area.

The proposed low-income housing development on Erf 8270 and Portion 4 of Farm 132 in Vredenburg aligns well with the Environmental Management Framework (EMF) for the Greater Saldanha Area (2021). Located within the Saldanha Bay Municipality's designated urban edge, the site is considered appropriate for development, especially given its degraded condition from previous agricultural use. A biodiversity compliance statement confirms the absence of sensitive vegetation or species, and the site lies outside any Critical Biodiversity Areas (CBAs), Ecological Support Areas (ESAs), or wetlands.

The development supports the EMF's objectives for compact, integrated, and inclusive settlements. It includes institutional erven (for a crèche and church), centrally located open spaces to enhance safety and community oversight, and walkable access to existing economic opportunities. Essential infrastructure will be confined to road reserves and designed to minimize environmental impact.

Additionally, the project addresses urgent housing needs while promoting home ownership, social cohesion, and public safety key elements of the EMF's vision for sustainable urban development. Overall, the development is well-aligned with the EMF's environmental and planning principles and makes effective use of low-sensitivity land to support socio-economic upliftment.

5.	Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.
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The Pre-Application and Post-Application Basic Assessment Reports (BARs) were circulated for review, and comments were received from the Department of Environmental Affairs and Development Planning (DEAD&DP), CapeNature, the Department of Infrastructure, and Heritage Western Cape (HWC). These authorities recommended minor amendments to the Pre-Application and Post-Application BARs, which were subsequently incorporated by the Environmental Assessment Practitioner (EAP). No significant biodiversity concerns were identified, and CapeNature expressed agreement with the findings of the appointed specialist consultants.

Heritage Western Cape reviewed the proposed development and confirmed that no further heritage assessments or investigations are required.

The following compliance statements were undertaken as part of the submission of the Notice of Intent (NOI) to DEAD&DP:

1. A Plant Species Compliance Statement was undertaken by Enviro-EAP in December 2023.
2. An Aquatic Biodiversity Compliance Statement was initially undertaken during the pre-application phase. Following review by the competent authority, an additional Aquatic Biodiversity Compliance Statement was prepared by EnviroSwift, a suitably qualified and SACNASP-registered freshwater specialist, to ensure full compliance with the gazetted aquatic biodiversity assessment protocols. The EnviroSwift Compliance Statement supersedes the earlier aquatic statement for the purposes of decision-making.
3. An Animal Species Compliance Statement was undertaken by Enviro-EAP in December 2023 and was subsequently subjected to an independent peer review by a suitably qualified faunal specialist, after which the statement was updated to address protocol compliance requirements.
4. An Agricultural Compliance Statement was undertaken by Johann Lanz in May 2024.

(Refer to **Appendix G** of this report.)

None of the above compliance statements identified any biodiversity items of concern. The site has been severely degraded as a result of historical agricultural activities and ongoing anthropogenic impacts, including illegal dumping. Sensitive plant and animal species typically associated with the vegetation type were not recorded on site, and the site is considered to be in a very poor ecological state. No FEPA wetlands were mapped within the site boundary; however, a FEPA wetland is located approximately 120 m northwest of the site and will not be affected by the proposed development.

6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development.
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Refer to Point 5 above.

7.	Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.
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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.
The Screening Report has been updated but the contents thereof remain the same.	
9.	Explain how the proposed development will optimise vacant land available within an urban area.
Supporting uses are located within walking distances and the development provides erven for a crèche and a church. Economic opportunities are located within the existing community and within walking distance.	
10.	Explain how the proposed development will optimise the use of existing resources and infrastructure.
Saldanha Bay Municipality and the various existing community structures have the institutional capacity to manage and absorb the project.	
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).
Saldanha Bay Municipality and the various existing community structures have the institutional capacity to manage and absorb the project. Service confirmation letters will be obtained.	
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.
<p>The proposed development meets the following key considerations in terms of Need and Desirability:</p> <ul style="list-style-type: none"> <li>• Development of mixed-use and compact settlements that promote competitiveness, social inclusion, improved quality of life, efficient delivery of affordable services, and resilience to environmental hazards and human safety risks;</li> <li>• Increased residential densities in appropriate locations, aligned with available infrastructure, services, and spatial capacity;</li> <li>• Integration of complementary land uses to support functional and sustainable urban form;</li> <li>• Promotion of public transport-oriented development and walkable neighbourhoods;</li> <li>• Clustering of activities to promote consolidated urban settlements rather than dispersed suburban development;</li> <li>• Creation of settlements that foster a sense of place through accessible settlement patterns, a mix of land uses and densities, and provision of community facilities and social services;</li> <li>• Location of supporting land uses within walking distance, including the provision of erven for a crèche and a church, with economic opportunities located within the existing community and accessible on foot; and</li> <li>• Support for crime prevention through urban upgrading by promoting ownership and community responsibility. Residential erven will be allocated to beneficiaries on the municipal waiting list and will be privately owned. Public open spaces are centrally located within residential areas to ensure passive surveillance by surrounding dwellings, thereby enhancing safety and providing secure play areas for children.</li> </ul> <p>Compliance statements relating to biodiversity and agricultural potential were also undertaken as part of the environmental assessment process. None of the compliance statements identified any biodiversity items of concern. The site has been severely degraded as a result of historical agricultural activities and ongoing anthropogenic impacts, including illegal dumping. Sensitive plant and animal species typically associated with the vegetation type were not recorded on site, and the site is considered to be in a very poor ecological state. No FEPA wetlands were mapped within the site boundary; however, a FEPA wetland is located approximately 120 m northwest of the site and will not be affected by the proposed development.</p>	

## 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.

PPP has been conducted for the Pre-Application and Post-Application Phase, and proof of PPP has been attached to this report as Appendix F.

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

NAME OF ORGANIZATION	NAME AND SURNAME	EMAIL
Department of Environmental Affairs and Development Planning: Development Management		<a href="mailto:deadpeiaadmin@westerncape.gov.za">deadpeiaadmin@westerncape.gov.za</a>
Western Cape Department of Agriculture	Mary James Daniel Johnson	<a href="mailto:Daniel.Johnson@westerncape.gov.za">Daniel.Johnson@westerncape.gov.za</a> <a href="mailto:Mary.James@westerncape.gov.za">Mary.James@westerncape.gov.za</a>
Department of Environmental Affairs and Development Planning: Waste Management	Saliem Haider	<a href="mailto:Saliem.Haider@westerncape.gov.za">Saliem.Haider@westerncape.gov.za</a>
Department of Environmental Affairs and Development Planning: Air Quality Management	Joy Leaner	<a href="mailto:joy.leaner@westerncape.gov.za">joy.leaner@westerncape.gov.za</a>
Department of Environmental Affairs and Development Planning: Pollution and Chemicals Management	Arabel McClelland	<a href="mailto:Arabel.McClelland@westerncape.gov.za">Arabel.McClelland@westerncape.gov.za</a>
Department of Transport and Public Works Directorate: Road Planning	Devlin Fortuin	<a href="mailto:devlin.fortuin@westerncape.gov.za">devlin.fortuin@westerncape.gov.za</a>
Department of Water Affairs and Sanitation	Warren Dreyer, Derril Daniels, M. Noqhamza, and R Singo	<a href="mailto:dreyerw@dwa.gov.za">dreyerw@dwa.gov.za</a> <a href="mailto:danielsd@dwa.gov.za">danielsd@dwa.gov.za</a> <a href="mailto:SingoR@dws.gov.za">SingoR@dws.gov.za</a> <a href="mailto:noqhamzam@dws.gov.za">noqhamzam@dws.gov.za</a>
Department of Waste Management	Mr. Saliem Haider	<a href="mailto:Saliem.Haider@westerncape.gov.za">Saliem.Haider@westerncape.gov.za</a>
Saldanha Bay Municipality	Lindsey Gaffley	<a href="mailto:Lindsey.Gaffley@sbm.gov.za">Lindsey.Gaffley@sbm.gov.za</a>
Saldanha Bay Municipality - Project Management Unit	Abigail Louw	<a href="mailto:Abigail.Louw@sbm.gov.za">Abigail.Louw@sbm.gov.za</a>
Saldanha Bay Municipality – Integrated Development Planning	Asanda Tolbadi	<a href="mailto:Asanda.Tolbadi@sbm.gov.za">Asanda.Tolbadi@sbm.gov.za</a>

Saldanha Bay Municipality – Local Economic Development	Thabisile Mkhize	<a href="mailto:Thabisile.Mkhize@sbm.gov.za">Thabisile.Mkhize@sbm.gov.za</a>
Saldanha Bay Municipality – Town Planning		<a href="mailto:Townplanning@sbm.gov.za">Townplanning@sbm.gov.za</a>
Saldanha Bay Municipality – Environment & Heritage	Nazeema Duarte	<a href="mailto:Nazeema.Duarte@sbm.gov.za">Nazeema.Duarte@sbm.gov.za</a>
Saldanha Bay Municipality – Ward Councillor (Ward 11)	Cllr Sharon Scholtz	<a href="mailto:Sharon.scholtz@sbm.gov.za">Sharon.scholtz@sbm.gov.za</a>
Saldanha Bay Municipality – Ward Councillor (Ward 12)	Cllr Lelethu Mbane	<a href="mailto:Lelethu.mbane@sbm.gov.za">Lelethu.mbane@sbm.gov.za</a>
Environmental Control Officers and Heritage Inspectors	Mrs Maurietta Stewart, Head (Central)	<a href="mailto:Maurietta.stewart@capetown.gov.za">Maurietta.stewart@capetown.gov.za</a>
CapeNature-Land Use Advice	Ismat Adams	<a href="mailto:iadams@capenature.co.za">iadams@capenature.co.za</a> <a href="mailto:mwheeler@capenature.co.za">mwheeler@capenature.co.za</a>
Heritage Western Cape	Waseefa Dhansay	<a href="mailto:waseefa.dhansay@westerncape.gov.za">waseefa.dhansay@westerncape.gov.za</a>
Eskom	John Geeringh	<a href="mailto:GeerinJH@eskom.co.za">GeerinJH@eskom.co.za</a> <a href="mailto:HenninWM@eskom.co.za">HenninWM@eskom.co.za</a> <a href="mailto:RanwedRP@eskom.co.za">RanwedRP@eskom.co.za</a>

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

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

**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.		
<p>Casper Badenhorst compiled a Geotechnical Report for the proposed development.</p> <p>The geotechnical investigation found that groundwater was encountered only at depths greater than 2.0 m in a limited number of test pits, with no groundwater recorded across the majority of the site. The soils are generally highly permeable and naturally drain towards the north-eastern portion of the site, thereby reducing the potential for water accumulation. Groundwater is not expected to pose a constraint to construction activities; however, appropriate drainage measures during excavation are recommended as a precaution. Overall, the groundwater conditions are considered favourable for the proposed development.</p> <p>The following compliance statements were undertaken as part of the submission of the Notice of Intent (NOI) to the Department of Environmental Affairs and Development Planning (DEA&amp;DP):</p> <ol style="list-style-type: none"> <li>1. A Plant Species Compliance Statement was undertaken by Enviro-EAP in December 2023.</li> <li>2. An Aquatic Biodiversity Compliance Statement was initially undertaken during the pre-application phase. Following review by the competent authority, an additional Aquatic Biodiversity Compliance Statement was prepared by EnviroSwift, a suitably qualified and SACNASP-registered freshwater specialist, to ensure full compliance with the gazetted aquatic biodiversity assessment protocols. The EnviroSwift Compliance Statement supersedes the earlier aquatic statement for the purposes of decision-making.</li> <li>3. An Animal Species Compliance Statement was undertaken by Enviro-EAP in December 2023 and was subsequently subjected to an independent peer review, after which the statement was updated to address protocol compliance requirements.</li> <li>4. An Agricultural Compliance Statement was undertaken by Johann Lanz in May 2024.</li> </ol> <p><b>(Refer to Appendix G of this report.)</b></p> <p>None of the above compliance statements identified any biodiversity items of concern. The site has been severely degraded as a result of historical agricultural activities and ongoing anthropogenic impacts, including illegal dumping. Sensitive plant and animal species typically associated with the vegetation type were not recorded on site, and the site is considered to be in a very poor ecological state. No FEPA wetlands were mapped within the site boundary; however, a FEPA wetland is located approximately 120 m northwest of the site and will not be affected by the proposed development.</p>			
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
<p>The site is located on a poor aquifer which has been classified as intergranular and fractured with a yield of 0.0 – 0.1l/s, electrical conductivity of &gt; 520 mS/m with a recharge of 11 – 15 mm/a. The aquifer is further classified as least vulnerable with a low susceptibility. This information was obtained with the use of the CapeFarmMapper tool.</p>			
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.		

The geotechnical investigation conducted for the proposed development on Erf 8270 and Portion 4 of Farm 132 in Vredenburg included an assessment of groundwater conditions, which are a critical consideration in determining the site's suitability for construction. Groundwater was encountered in only three of the sixteen test pits, and only at depths greater than 2.0 meters, indicating that the groundwater table is relatively deep and unlikely to interfere with shallow foundations or service trenches. The majority of test pits showed no presence of groundwater, reinforcing the conclusion that the site is generally dry under normal conditions. The soils across the site were found to be highly permeable, which supports efficient drainage and reduces the likelihood of surface water accumulation or prolonged saturation. Additionally, the site naturally drains towards the northeast via sheetwash, further aiding surface water dispersal. While groundwater is not expected to pose a major constraint to development, the report recommends that excavations be adequately drained during construction, particularly to manage rainwater or in the event of a temporary rise in the water table. Overall, the groundwater conditions are considered favourable for development, provided that standard construction drainage measures are implemented to mitigate any short-term water-related risks.

## 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.		
An Aquatic Biodiversity Compliance Statement was compiled by EnviroSwift, an independent and suitably qualified SACNASP-registered freshwater specialist. This statement was prepared to confirm the aquatic biodiversity sensitivity of the site and to ensure full compliance with the relevant assessment protocols.			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		
No FEPA was mapped on site, but a FEPA wetland was mapped approximately 120m northwest of the proposed development site.			

## 3. Coastal Environment

3.1.	Was a specialist study conducted?	YES	NO
3.2.	<del>Provide the name and/or company who conducted the specialist study.</del>		
N/A			
3.3.	<del>Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.</del>		
N/A			
3.4.	<del>Explain how estuary management plans (if applicable) has influenced the proposed development.</del>		
N/A			
3.5.	<del>Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.</del>		
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.		
Enviro-EAP			
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.		
<p>The following systematic conservation planning and biodiversity tools have been used:</p> <ul style="list-style-type: none"> <li>• Biodiversity Spatial Plan (BSP) (CapeFarmMapper)</li> <li>• Google Earth historic imagery</li> <li>• NFEPA</li> </ul> <p>These tools as well as the specialist's inputs were used to determine the conservational value of the proposed site for development. Please see information detailed below for more information.</p>			

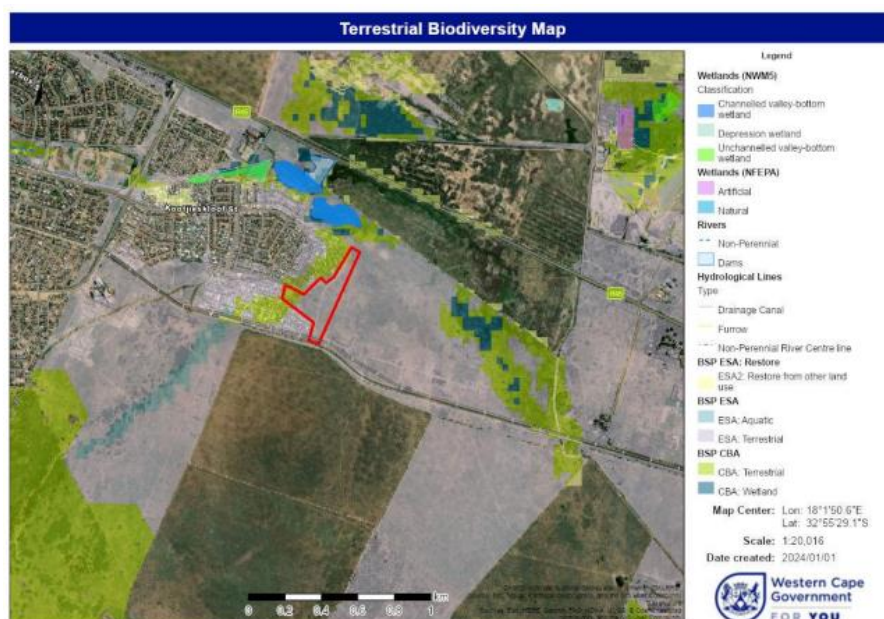
4.4. Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.

The following compliance statements were undertaken as part of the submission of the Notice of Intent (NOI) to the Department of Environmental Affairs and Development Planning (DEA&DP):

1. A Plant Species Compliance Statement was undertaken by Enviro-EAP in December 2023.
2. An Aquatic Biodiversity Compliance Statement was initially undertaken during the pre-application phase. Following review by the competent authority, an additional Aquatic Biodiversity Compliance Statement was prepared by EnviroSwift, a suitably qualified and SACNASP-registered freshwater specialist, to ensure full compliance with the gazetted aquatic biodiversity assessment protocols. The EnviroSwift Compliance Statement supersedes the earlier aquatic statement for the purposes of decision-making.
3. An Animal Species Compliance Statement was undertaken by Enviro-EAP in December 2023 and was subsequently subjected to an independent peer review, after which the statement was updated to address protocol compliance requirements.
4. An Agricultural Compliance Statement was undertaken by Johann Lanz in May 2024.

**(Refer to Appendix G of this report.)**

None of the above compliance statements identified any biodiversity items of concern. The site has been severely degraded as a result of historical agricultural activities and ongoing anthropogenic impacts, including illegal dumping. Sensitive plant and animal species typically associated with the vegetation type were not recorded on site, and the site is considered to be in a very poor ecological state. No FEPA wetlands were mapped within the site boundary; however, a FEPA wetland is located approximately 120 m northwest of the proposed development area and will not be affected by the proposed development.



**Figure 2: Terrestrial Biodiversity and NFEPA Map**

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 is located within the Saldanha Flats Strandveld (Endangered). However, the site has been transformed from its natural state and is severely degraded through previous agricultural activities and anthropogenic impacts such as illegal dumping.

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. The proposed development does not fall within a protected area.

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

The proposed development entails the establishment of low-income housing within Ward 9 of the Saldanha Bay Municipality and will be located on Erf No. 8270 and Portion 4 of Farm 132. The site is considered to be severely degraded as a result of historical agricultural activities and ongoing anthropogenic impacts, including illegal dumping. Based on the findings of the updated and peer-reviewed Animal Species Compliance Statement and the Aquatic Biodiversity Compliance Statement undertaken by EnviroSwift, no site-specific faunal or aquatic mitigation measures are required. This conclusion is based on the confirmed low sensitivity of the site and the absence of Species of Conservation Concern and aquatic features within the development footprint. General environmental management measures contained within the approved Environmental Management Programme (EMPr) will nevertheless be implemented as a precautionary measure.

## 5. Geographical Aspects

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

N/A

## 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.		

A NID to HWC

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

As per the SAHRIS Palaeosensitivity Map, the site is mostly located within a very high paleontological sensitive area however the land has been previously excavated for agricultural purposes. (<https://sahris.sahra.org.za/map/palaeo>).

### SAHRIS Palaeo Map



1 in 250 000 geological formation layers are courtesy of the Council for GeoScience  
For more information, go to [How to Use the Palaeontological \(fossil\) Sensitivity Map](#)

Colour	Sensitivity	Required Action
RED	VERY HIGH	field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	desktop study is required
BLUE	LOW	no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

According to Section 38(1) of the National Heritage Resources Act, NHRA (Act No. 25 of 1999), a Heritage Impact Assessment is required when:

- the construction of a road that exceeds 300m in length.
- construction of a bridge exceeds 50m in length.
- any development exceeding 5 000m<sup>2</sup> in extent.

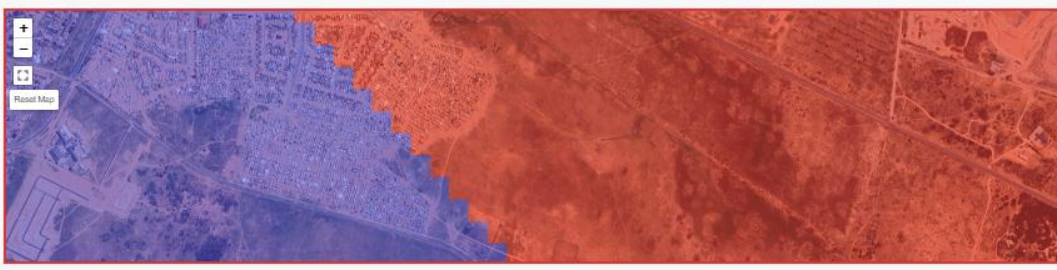
A Notice of Intent to Develop (NID) have been submitted to HWC and the response is awaited. (Refer to **Appendix G** of this report.) However, should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and Heritage Western Cape must be notified without delay. Fossil finds procedure to be included in environmental authorization.

## 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.

As per the SAHRIS Palaeosensitivity Map, the site is mostly located within a very high paleontological sensitive area however the land has been previously excavated for agricultural purposes. (<https://sahris.sahra.org.za/map/palaeo>).

**SAHRIS Palaeo Map**



1 in 250 000 geological formation layers are courtesy of the [Council for GeoScience](#). For more information, go to [How to Use the Palaeontological \(Fossil\) Sensitivity Map](#).

Colour	Sensitivity	Required Action
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BLUE	LOW	no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

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- the construction of a road that exceeds 300m in length.
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A Notice of Intent to Develop (NID) have been submitted to HWC. (Refer to **Appendix G** of this report.) However, should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and Heritage Western Cape must be notified without delay. Fossil finds procedure to be included in environmental authorization.

## 8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.
<p><b><u>Economic Characteristics</u></b></p> <p>In 2020, Saldanha Bay's economy was valued at R10,918.7 billion, employing 48,438 individuals. Historical data from 2016 to 2020 reveals an average annual growth rate of -0.2%, primarily impacted by the 2020 recession, load shedding, and drought in preceding years. However, estimates for 2021 indicate a notable recovery with a 6.0% growth rate, attributed to rebounds in community, social, and personal services (9.2%); agriculture, forestry, and fishing (8.3%); wholesale and retail trade, catering, and accommodation (7.6%); and manufacturing (7.4%). Despite this positive trend, the mining and quarrying (-16.1%) and construction (-4.6%) sectors experienced continued decline after the easing of restrictions, contributing to an overall economic recovery with some sectors still facing challenges.</p> <p>Despite the economic rebound in 2021, job losses persisted, with an estimated 1,570 net jobs lost. The most significant declines were observed in wholesale and retail trade, catering, and accommodation (-360 jobs), manufacturing (-157 jobs), and agriculture, forestry, and fishing (-924 jobs). This discrepancy between economic growth and employment figures underscores a lag in job creation despite improved GDP performance in key sectors. Addressing this employment gap remains a critical aspect for sustaining and broadening the benefits of the economic recovery in Saldanha Bay.</p> <p><b><u>Social Characteristics</u></b></p> <p>The population growth projection for the municipal area stands at an estimated 2.1% annually, surpassing the average annual population growth rate of the West Coast District (1.7%). As of 2022, the population is 125,687 persons, expected to increase to 136,611 by 2026. The sex ratio indicates a slight favour towards females, with a ratio of 50.2% females to 49.8% males in 2022. This ratio fluctuates marginally over the years, reaching 99.9 in 2023 and remaining relatively stable between 100.1 and 100.3 from 2024 to 2026.</p> <p>The demographic breakdown per age cohort reveals significant growth in the 65+ age category, suggesting potential improvements in life expectancy or the area becoming a preferred retirement destination. Simultaneously, steady growth is anticipated in the working-age cohort, contributing to an overall decrease in the dependency ratio towards 2026. The average household size is predicted to marginally decline from 3.3 to 3.1 individuals per household from 2022 to 2026. This trend is influenced by factors such as lower fertility rates, an ageing population, and socio-economic dynamics impacting employment, education, and housing markets.</p>	

Moreover, the concept of population density is introduced, indicating the number of people per square kilometre in the defined area. In 2022, the population density of the Saldanha Bay municipal area stood at 62 persons per square kilometre. This metric is crucial for effective urban planning, budgeting, and addressing environmental risks, as it reflects the impact of economic, social, and connectivity factors on the population distribution within the area.

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

**Benefits of low-income housing:**

Low-income housing plays a pivotal role in fostering social equity and addressing economic disparities within communities. As a fundamental component of urban development, affordable housing ensures that individuals and families with limited financial means have access to safe, stable, and decent living conditions. By providing affordable housing options, communities can create more inclusive environments, reducing the risk of homelessness and improving overall quality of life for vulnerable populations. Moreover, accessible housing is closely linked to economic opportunity, as it enables low-income individuals to reside in proximity to job opportunities, educational institutions, and essential services, thereby enhancing their chances of upward mobility and economic advancement.

Beyond its immediate impact on individuals, low-income housing contributes to the overall stability and vibrancy of communities. Affordable housing developments can spur economic growth by attracting businesses, creating job opportunities, and revitalizing neighbourhoods. Additionally, they promote social cohesion by fostering diverse and mixed-income communities, breaking down socio-economic barriers, and encouraging a sense of belonging among residents. In essence, the importance of low-income housing extends beyond providing shelter; it serves as a catalyst for social and economic development, contributing to the creation of more resilient, equitable, and thriving societies.

The following additional socio-economic benefits associated with the specific development have been listed by the professional team:

- Develop mixed-use and compact settlements through competitiveness, social inclusion, quality of life, efficient delivery of affordable services and resilience to environmental hazards and human safety;
- Increase densities in appropriate locations aligned with resources and space;
- Integration of complementary land uses;
- Public transport orientation and walkable neighbourhoods;
- Cluster activities and promote urban settlements rather than suburban settlements;
- Settlements that include sense of place, accessible settlement patterns, mixed land uses and densities, facilities and social services;
- Supporting uses are located within walking distances and the development provides erven for a crèche and a church. Economic opportunities are located within the existing community and within walking distance.
- To support crime prevention through urban upgrading it is important to spread ownership to the community to create responsibility. The erven will be allocated to beneficiaries on the waiting list and these properties will be owned by them. The open spaces are also placed in the middle of the residential areas to ensure that the residential properties overlook the open space supporting safety for children to play on the open space and the surrounding houses can keep an eye on them.

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

Refer to the above

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.

Impacts on people’s health and well-being due to the proposed development are unlikely.

The construction phase will inevitably involve impacts in terms of noise, dust, visual, heritage and traffic. These impacts have however been assessed as part of this Basic and mitigation of these impacts have been addressed by means of the Environmental Management Programme (EMPr), included in **Appendix H** of this report.

**POTENTIAL VISUAL IMPACTS**

The proposed development will have potential visual impacts during the construction and operation phase of the development. The nature of the impact will be the visual effect the activity would have on the receiving environment.

Construction phase:

- Visual scarring during the process of clearing and levelling to prepare the area for development.

Operation Phase:

- Change from an undeveloped site to a developed site.
- The vacant site becoming a built site.
- Although the change from a vacant site to a built-up site can be regarded as a visual impact, it must be noted that the site is currently somewhat visually unappealing given the illegal dumping that is undertaken on the site. It is also

noted that the proposed housing development will be in line with the "sense of place" of the surrounding area, which includes residential uses varying from low to high density residential.

**POTENTIAL HERITAGE IMPACTS**

The proposed residential development will not result in any significant impacts to heritage resources. As such we recommend that no further heritage-related studies are required in relation to the proposed development.

The NID was submitted to HWC and a response was received from HWC, as included in **Appendix G**, confirming that no further work is required in terms of heritage impacts.

**DUST AND NOISE IMPACTS**

As a result of the construction phase of this development noise and dust impacts are expected to occur in the area due to an increase in construction vehicle and truck traffic for the duration of the construction phase while materials are being transported to the site, excavations are being made, and vegetative groundcover is being removed

**TRAFFIC, SAFETY AND ACCESS IMPACTS**

As a result of the construction phase of this development traffic impacts are expected to occur in the area due to an increase in construction vehicle and truck traffic in the area for the duration of the construction phase while materials are being transported to the site. Road safety impacts and road condition impacts could also occur.

**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.	
<p>The proposed development encompasses the establishment of low-income housing on Erf 8270 and Portion 4 of Farm 132, Vredenburg, comprising of the following:</p> <ul style="list-style-type: none"> <li>• Approximately 324 Residential Zone IV erven (UISP) with an average size of 100m<sup>2</sup></li> <li>• 6 Open Space Zone 1 erven,</li> <li>• 1 Institutional Zone II (Church) erf and</li> <li>• 1 Institutional Zone I (Creche) erf;</li> </ul> <p>along with the necessary services and road infrastructure.</p> <p>The overall development area is estimated to cover around 8.2575 hectares.</p> <p>Approximately 2,800 meters of asphalt roads will be constructed, with widths ranging between 5.0 m and 5.5 m, depending on the width of the road reserve. Along all roads, 1.0 m wide sidewalks made of gravel will be provided. The internal roads are classified as residential Class 5 roads, with road reserve widths ranging from 13 m to 10 m. All road markings, traffic signs, and materials will comply with the Southern African Development Community Road Traffic Sign Manual (SARTSM), 1997. Road markings will be applied using road marking paint, and all traffic signs will feature reflective surfaces. The internal road network will link to nearby residential areas via Kooftjieskloof Road, with an additional connection at the western edge of the development to an unnamed road.</p> <p>Approximately 2 500 m of water pipelines will be constructed, together with all required specials. Each erf will be serviced with a house connection and water meter. Fire hydrants will be installed at such locations to ensure coverage of the entire development.</p> <p>Approximately 2 500 m of sewer pipelines will be constructed. All erven will receive a house connection point. This point will be located at such a position to ensure that at least 70 % of the erf can drain towards and connect at this point.</p> <p>Essential service facilities, including stormwater and sewage systems, will be situated within the road reserve of the planned internal roads of the proposed development. The mandated service infrastructure is designed with a diameter of less than 350 mm.</p>	
Provide a description of any other property and site alternatives investigated.	
No site alternatives were considered for this proposed development, as it is the only site available to the applicant (Saldanha Bay Municipality) for low-income housing development.	
Provide a motivation for the preferred property and site alternative including the outcome of the site selectin matrix.	
No site alternatives were considered for this proposed development, as it is the only site available to the applicant (Saldanha Bay Municipality) for low-income housing development.	

Provide a full description of the process followed to reach the preferred alternative within the site.	
No site alternatives were considered for this proposed development, as it is the only site available to the applicant (Saldanha Bay Municipality) for low-income housing development.	
Provide a detailed motivation if no property and site alternatives were considered.	
No site alternatives were considered for this proposed development, as it is the only site available to the applicant (Saldanha Bay Municipality) for low-income housing development.	
List the positive and negative impacts that the property and site alternatives will have on the environment.	
<p>The proposed low-income housing development on Erf 8270 and Portion 4 of Farm 132 in Vredenburg presents a range of positive and negative environmental impacts, shaped largely by the unique circumstances of the site and the absence of viable alternatives. No site alternatives were considered, as this was the only land available to the Saldanha Bay Municipality for low-income housing. However, the site's location within the designated urban edge, on previously transformed agricultural land with low farming potential, makes it an appropriate choice for development from both a spatial and environmental planning perspective.</p> <p>A key objective of the Western Cape's Provincial Spatial Development Framework (PSDF) and the Saldanha Bay Municipal SDF is to limit urban sprawl. By locating the development within the urban edge of Vredenburg, the project utilizes already-altered land rather than encroaching upon ecologically sensitive or undeveloped rural areas. This infill development approach ensures that growth occurs in areas already earmarked for human settlement, making use of existing service infrastructure and road networks. The project's high-density layout, with 324 erven averaging 100m<sup>2</sup>, accommodates a significant number of households in a compact footprint (8.2575 hectares), reducing the land area needed for housing expansion.</p> <p>Additionally, the integration of institutional erven (for a crèche and church), open spaces, and close proximity to existing social and economic amenities ensures a mixed-use, walkable environment, further discouraging car-dependent, low-density sprawl. The design connects with existing street networks, facilitating smooth integration with the surrounding urban fabric and reducing the need for isolated, stand-alone developments that often contribute to urban fragmentation.</p> <p>Environmental enhancements are also possible through sustainable urban design. For instance, stormwater infrastructure confined to road reserves can be designed as green infrastructure to reduce runoff and improve water quality. The development's proximity to existing economic and social services, along with its integration into existing street networks, supports compact urban growth and could encourage the use of public transportation, further minimizing environmental impact.</p> <p>Nonetheless, the project also presents potential negative environmental consequences. The conversion of agricultural land however low in productivity still entails the permanent loss of land that could contribute to food security or carbon sequestration. Habitat disruption and species displacement are also concerns, although the site has already been environmentally degraded. During and after construction, increased surface runoff, soil erosion, and pollution are risks that need to be carefully managed through all project phases. Additionally, if not adequately supported by public transport infrastructure, the development may encourage car dependency, increasing greenhouse gas emissions.</p> <p>In summary, while the lack of site alternatives limits options for minimizing impact, the chosen location and development plan offer a number of environmentally responsible features that align with sustainable urban development goals. Through its compact design, integration with existing infrastructure, and adherence to planning frameworks, the development actively curtails urban sprawl while addressing critical housing needs in the region. With proper environmental management, the positive impacts of the development such as efficient land use, reduced ecological disruption, and socio-economic upliftment can outweigh its potential drawbacks.</p>	
1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred activity alternative.	
No activity alternatives were considered for this proposed development because:	
<ol style="list-style-type: none"> <li>1. it is the only site available to the applicant (Saldanha Bay Municipality) for low-income housing development.</li> <li>2. And due to the environmental condition of the proposed development area and surrounding area the proposed activities should not have any major impacts on the receiving environment.</li> </ol>	
Provide a description of any other activity alternatives investigated.	
No activity alternatives were considered for this proposed development because:	
<ol style="list-style-type: none"> <li>1. it is the only site available to the applicant (Saldanha Bay Municipality) for low-income housing development.</li> <li>2. And due to the environmental condition of the proposed development area and surrounding area the proposed activities should not have any major impacts on the receiving environment.</li> </ol>	
Provide a motivation for the preferred activity alternative.	
No activity alternatives were considered for this proposed development because:	
<ol style="list-style-type: none"> <li>1. it is the only site available to the applicant (Saldanha Bay Municipality) for low-income housing development</li> <li>2. And due to the environmental condition of the proposed development area and surrounding area the proposed activities should not have any major impacts on the receiving environment.</li> </ol>	

Provide a detailed motivation if no activity alternatives exist.	
<p>The proposed low-income housing development is justified by the poor ecological state of the area, which has been significantly degraded due to past agricultural activities and anthropogenic impacts such as illegal dumping. This degradation has diminished the ecological resilience of the land, meaning that any further development is unlikely to significantly worsen its condition. A plant species compliance statement undertaken in December 2023 (<b>Appendix G</b>) confirms that sensitive plant species typically associated with the natural Saldanha Flats Strandveld vegetation were not found on the site. This indicates that the area is no longer supporting a highly sensitive or unique ecosystem, further reducing the potential for significant ecological harm from development.</p> <p>Although the development may result in the removal of indigenous vegetation, this impact is relatively small in comparison to the overall ecological state of the site. The poor condition of the site means that the removal of this vegetation is unlikely to have substantial negative environmental consequences, and the project will likely not require the removal of more than 1 hectare of indigenous vegetation. Additionally, while the site falls within a Critical Biodiversity Area (CBA) 1 and supports an endangered ecosystem, the current degradation of the land means its ecological value has already been heavily compromised. Consequently, the development presents an opportunity to implement sustainable planning practices that could help mitigate some of the ongoing environmental degradation.</p> <p>Furthermore, the proposed housing addresses critical needs for affordable and low-income housing in the area, providing significant socio-economic benefits by improving living conditions and offering greater access to essential services for disadvantaged populations. Whilst the area is environmentally sensitive, the poor ecological state of the land, the lack of sensitive plant species, and the limited removal of indigenous vegetation make it unlikely that the development will result in significant ecological harm. Sustainable housing needs and environmental stewardship can be balanced through careful planning and mitigation measures.</p>	
List the positive and negative impacts that the activity alternatives will have on the environment.	
<p>No activity alternatives were considered for this proposed development because:</p> <ol style="list-style-type: none"> <li>1. it is the only site available to the applicant (Saldanha Bay Municipality) for low-income housing development.</li> <li>2. And due to the environmental condition of the proposed development area and surrounding area the proposed activities should not have any major impacts on the receiving environment.</li> </ol>	
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.	
No design/layout alternatives were considered. Due to the nature of this proposal, only the preferred alternative was considered and assessed in detail.	
Provide a description of any other design or layout alternatives investigated.	
No design/layout alternatives were considered. Due to the nature of this proposal, only the preferred alternative was considered and assessed in detail.	
Provide a motivation for the preferred design or layout alternative.	
No design/layout alternatives were considered. Due to the nature of this proposal, only the preferred alternative was considered and assessed in detail.	
Provide a detailed motivation if no design or layout alternatives exist.	
<p>No design or layout alternatives for the proposed low-income housing development were considered, after extensive investigation and collaboration among multiple parties, including the developer, town planner, and other stakeholders. After several revisions to the Site Development Plan (SDP), it became clear that the preferred layout maximized the effective use of the available site area. This configuration was chosen as it not only provided adequate living spaces for the low-income housing development but also ensured the integration of important community resources, such as a creche, church, and multiple open spaces for recreational activities.</p> <p>The design was deemed to offer the best balance between space utilization and the creation of a functional, vibrant community. The prioritization of these resources was critical in meeting the needs of the residents and ensuring long-term sustainability. Furthermore, the design had undergone multiple revisions, confirming that it was the most optimal solution to support the residents' quality of life.</p>	
List the positive and negative impacts that the design alternatives will have on the environment.	
No design/layout alternatives were considered. Due to the nature of this proposal, only the preferred alternative was considered and assessed in detail.	
1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred technology alternative:	
No technology alternatives have been considered for this development.	
Provide a description of any other technology alternatives investigated.	

No technology alternatives have been considered for this development.	
Provide a motivation for the preferred technology alternative.	
No technology alternatives have been considered for this development.	
Provide a detailed motivation if no alternatives exist.	
Due to the primary objective of providing affordable housing for low-income residents, no technology alternatives were considered as part of the proposed development. The project was designed with a strong focus on minimizing construction costs to ensure that the final product remained accessible to the target community. While advanced technologies and alternative building methods can offer benefits in terms of resource efficiency and sustainability, they often come with higher upfront costs, including specialized materials and training. Given the need to prioritize affordability, it was determined that traditional, cost-effective construction methods were the most viable option to meet the project's goals. This approach allowed for the efficient use of resources while ensuring that the development could provide essential housing and community spaces without exceeding financial constraints.	
List the positive and negative impacts that the technology alternatives will have on the environment.	
No technology alternatives have been considered for this development.	
1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred operational alternative.	
No operational alternatives were considered. Due to the nature of this proposal, only the preferred alternative was considered and assessed in detail.	
Provide a description of any other operational alternatives investigated.	
No operational alternatives were considered. Due to the nature of this proposal, only the preferred alternative was considered and assessed in detail.	
Provide a motivation for the preferred operational alternative.	
No operational alternatives were considered. Due to the nature of this proposal, only the preferred alternative was considered and assessed in detail.	
Provide a detailed motivation if no alternatives exist.	
No operational alternatives were considered as part of the proposed low-income housing development due to the financial constraints associated with ensuring the project remains affordable for the target residents. Additionally, the development is bound to an Environmental Management Plan (EMP), which helps mitigate the environmental impact of construction and operational activities. This ensures that any potential negative environmental effects are managed effectively, allowing for the responsible development of the site while prioritizing affordability for the residents. Therefore, the decision was made to limit operational alternatives to those that could be integrated within the existing budget and the framework of the EMP.	
List the positive and negative impacts that the operational alternatives will have on the environment.	
No operational alternatives were considered. Due to the nature of this proposal, only the preferred alternative was considered and assessed in detail.	
1.6.	The option of not implementing the activity (the 'No-Go' Option).
Provide an explanation as to why the 'No-Go' Option is not preferred.	
The no-go option entails the maintaining of the status quo of the site. In this case, the no-go option would mean that the development will not take place and that there will consequently be no disturbance on environmental aspects of the site. The site will remain as is, undeveloped and the vegetation would remain in its present state. The no-go alternative will fail to address the dire need for housing in the area. Given the scale of the proposed housing development, a considerable economic contribution to the local community in the form of employment opportunities will also be foregone should the development not take place. Should the property remain vacant it will also most likely attract vagrancy, littering and other undesirable activities thereby compromising the safety and environmental quality of the area.	
<b><u>Pros and Cons of the No-Go Alternative</u></b>	
The No-Go alternative will likely result in the gradual decline and degradation of the vegetation on site unless access control, ongoing clearing of invasive alien plants as well as regular maintenance is undertaken on the site	
1.7.	Provide an 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.
No other alternatives were considered.	
1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.
The proposed low-income housing development on Erf 8270 and Portion 4 of Farm 132, Vredenburg, encompasses 324 residential erven, alongside open space, a church, and a creche, covering approximately 8.2575 hectares. The site is the only available option for this development, and no alternative sites were considered due to its unique position as the only site suitable for the Saldanha Bay Municipality's low-income housing needs. The land's previous agricultural use and illegal dumping has led to a degraded ecological state, which diminishes its environmental sensitivity, making it a suitable location for development.	

Extensive planning and collaboration led to the chosen layout, ensuring an optimal design that balances space efficiency, community resources, and long-term sustainability.

Operational alternatives were not considered for this project due to financial constraints, which necessitated a focus on keeping costs low to provide affordable housing. Advanced technologies and alternative methods that could improve resource efficiency would have raised the upfront costs, conflicting with the project's goal to remain within budget. The development is governed by an Environmental Management Plan (EMP), which mitigates potential environmental impacts through careful planning and management.

The "no-go" alternative would result in the status quo, with the land remaining undeveloped but prone to further degradation, safety concerns, and an absence of the critical low-income housing needed in the area. The decision to move forward with the development was made to address pressing housing needs while managing environmental impacts through mitigation measures outlined in the EMP.

## 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).

There are no No-Go areas relevant to the site.

## 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 2 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 on the basis of professional judgement.

It must be noted that determining the significance of impacts, although carefully and systematically considered, still 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
<b>EXTENT</b>	
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
<b>DURATION</b>	
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.
<b>MAGNITUDE OR INTENSITY</b>	
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.
<b>PROBABILITY</b>	
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
<b>SIGNIFICANCE</b>	
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.
<b>STATUS OF IMPACT</b>	
Whether the impact is positive (a benefit), negative (a cost) or neutral (status quo maintained)	
<b>DEGREE OF CONFIDENCE IN PREDICTIONS</b>	
The degree of confidence in the predictions is based on the availability of information and specialist knowledge (e.g. low, medium or high)	
<b>MITIGATION</b>	
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.

CONSTRUCTION PHASE	
<b>Potential impact and risk:</b>	<b>Noise:</b> 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:	<b>Negative</b>
Extent and duration of impact:	<b>Site Specific: Short Term</b>
Consequence of impact or risk:	<b>Nuisance to surrounding residence</b>
Probability of occurrence:	<b>Probable</b>
Degree to which the impact may cause irreplaceable loss of resources:	<b>No loss of resource</b>
Degree to which the impact can be reversed:	<b>Completely reversible</b>
Indirect impacts:	<b>Nuisance impacts to surrounding neighbours</b>
Cumulative impact prior to mitigation:	<b>Negligible</b>
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low to Medium</b>

Degree to which the impact can be avoided:	<b>Can be avoided</b>
Degree to which the impact can be managed:	<b>Can be managed</b>
Degree to which the impact can be mitigated:	<b>Can be mitigated</b>
Proposed mitigation:	<p><b>Noise Mitigation:</b></p> <ul style="list-style-type: none"> <li>• A complaints register must be opened.</li> <li>• Excavations and earth-moving activities should be restricted to normal construction working hours (7:30 – 17:30) as far as possible.</li> <li>• 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.</li> <li>• Noise levels must comply with the relevant health &amp; safety regulations and SANS codes and should be monitored by the Health &amp; Safety Officer as necessary and appropriate.</li> <li>• 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.</li> </ul>
Residual impacts:	<b>None</b>
Cumulative impact post mitigation:	<b>Negligible</b>
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
<b>Potential impact and risk:</b>	<b>Dust:</b> 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:	<b>Negative</b>
Extent and duration of impact:	<b>Site Specific: Short Term</b>
Consequence of impact or risk:	<b>Nuisance to surrounding residence</b>
Probability of occurrence:	<b>Probable</b>
Degree to which the impact may cause irreplaceable loss of resources:	<b>No loss of resource</b>
Degree to which the impact can be reversed:	<b>Completely reversible</b>
Indirect impacts:	<b>Nuisance impacts to surrounding neighbours</b>
Cumulative impact prior to mitigation:	<b>Negligible</b>
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low to Medium</b>
Degree to which the impact can be avoided:	<b>Can be avoided</b>
Degree to which the impact can be managed:	<b>Can be managed</b>
Degree to which the impact can be mitigated:	<b>Can be mitigated</b>
Proposed mitigation:	<p><b>Dust Mitigation:</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• The use of straw worked into the sandy areas may also help and the ECO must advise when this is necessary.</li> <li>• 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.</li> </ul>

	<ul style="list-style-type: none"> <li>All vehicles transporting sand/waste need to have tarpaulins covering their loads which will assist in any windblown sand occurring off the trucks.</li> <li>Dust levels specified in the National Dust Control Regulations (GN 827 of November 2013) may not be exceeded.</li> <li>A Complaints Register must be available at the site office for inspection by the ECO of dust complaints that may have been received.</li> <li>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.</li> </ul>
Residual impacts:	<b>None</b>
Cumulative impact post mitigation:	<b>Negligible</b>
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
<b>Potential impact and risk:</b>	<b>Visual Impacts:</b> 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:	<b>Negative</b>
Extent and duration of impact:	<b>Site Specific: Temporary</b>
Consequence of impact or risk:	<b>Visual impacts to surrounding neighbours</b>
Probability of occurrence:	<b>Probable</b>
Degree to which the impact may cause irreplaceable loss of resources:	<b>No loss of resource</b>
Degree to which the impact can be reversed:	<b>Partly reversible</b>
Indirect impacts:	<b>None</b>
Cumulative impact prior to mitigation:	<b>Negligible</b>
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
Degree to which the impact can be avoided:	<b>Can be partially avoided</b>
Degree to which the impact can be managed:	<b>Can be managed</b>
Degree to which the impact can be mitigated:	<b>Can be partially mitigated</b>
Proposed mitigation:	<p><b>Visual Impacts:</b></p> <ul style="list-style-type: none"> <li>The ECO must be consulted with to determine the appropriate location for the site camp (if required).</li> <li>The site camp must be always kept neat and tidy and free of litter.</li> <li>Waste must be managed according to the EMP.</li> <li>Good housekeeping practices on site must be maintained to ensure the site is kept neat and tidy.</li> <li>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.</li> <li>Work on site must be well-planned and well-managed so that work proceeds quickly and efficiently, thus minimizing the disturbance time.</li> <li>The site camp will require visual screening via shade cloth or other suitable material.</li> <li>Special attention should be given to the screening of highly reflective material.</li> <li>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.</li> <li>Construction vehicles must enter and leave the site during working hours.</li> <li>The appointed Environmental Control Officer (ECO) must undertake at least one site inspection bi-weekly for the</li> </ul>

	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:	<b>None</b>
Cumulative impact post mitigation:	<b>Negligible</b>
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
<b>Potential impact and risk:</b>	<b>Odours &amp; Emissions:</b> Construction related odours/emissions may cause a nuisance or health impacts to adjacent residents, staff on site.
Nature of impact:	<b>Negative</b>
Extent and duration of impact:	<b>Site Specific, Long-Term</b>
Consequence of impact or risk:	<b>Odour/Emissions nuisance to the adjacent residents and inhalation of construction related emissions could cause health impacts to those exposed to the fumes.</b>
Probability of occurrence:	<b>Improbable</b>
Degree to which the impact may cause irreplaceable loss of resources:	<b>No loss of resource</b>
Degree to which the impact can be reversed:	<b>Reversible</b>
Indirect impacts:	<b>Odour/Emissions nuisance to the adjacent residents and health impacts due to inhalation to those exposed to the construction related emissions.</b>
Cumulative impact prior to mitigation:	<b>Low</b>
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
Degree to which the impact can be avoided:	<b>Avoidable</b>
Degree to which the impact can be managed:	<b>Can be managed</b>
Degree to which the impact can be mitigated:	<b>Can be partially mitigated</b>
Proposed mitigation:	<p><b><u>Odour/Emissions:</u></b></p> <ul style="list-style-type: none"> <li>• Awareness training of personnel at the site and for vehicle operators on site will be conducted.</li> <li>• Contractors and Principal Agent/s shall at all times comply with the relevant statutory requirements including the Occupational Health and Safety Act, Act 85 of 1993.</li> <li>• The development of site-specific protocols with regard to delivery and use of products and use of the relevant SANS procedures.</li> </ul>
Residual impacts:	<b>Health impacts</b>
Cumulative impact post mitigation:	<b>Low</b>
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low to Medium</b>
<b>Potential impact and risk:</b>	<b>Solid Waste:</b> 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:	<b>Negative</b>
Extent and duration of impact:	<b>Site Specific, Short-Term</b>
Consequence of impact or risk:	<b>Waste generated on site, pollutant if not correctly managed</b>
Probability of occurrence:	<b>Probable</b>
Degree to which the impact may cause irreplaceable loss of resources:	<b>No loss of resources</b>
Degree to which the impact can be reversed:	<b>Reversible</b>
Indirect impacts:	<b>Pollution of the surrounding environment if solid waste isn't correctly managed.</b>
Cumulative impact prior to mitigation:	<b>Low</b>
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
Degree to which the impact can be avoided:	<b>Can be avoided</b>
Degree to which the impact can be managed:	<b>Can be managed</b>
Degree to which the impact can be mitigated:	<b>Can be mitigated</b>

Proposed mitigation:	<p><b>Solid waste management:</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>The Contractor will be bound by relevant mitigation measures as detailed in the Construction EMP.</li> </ul>
Residual impacts:	<b>None</b>
Cumulative impact post mitigation:	<b>Low</b>
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
<b>Potential impact and risk:</b>	<b>Effluent:</b> 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:	<b>Negative</b>
Extent and duration of impact:	<b>Site Specific, Short-Term</b>
Consequence of impact or risk:	<b>Effluent waste can pollute the surrounding environment if not correctly managed</b>
Probability of occurrence:	<b>Improbable</b>
Degree to which the impact may cause irreplaceable loss of resources:	<b>No loss of resources</b>
Degree to which the impact can be reversed:	<b>Reversible</b>
Indirect impacts:	<b>Effluent waste can pollute the surrounding environment if not correctly managed</b>
Cumulative impact prior to mitigation:	<b>Low</b>
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
Degree to which the impact can be avoided:	<b>Can be avoided</b>
Degree to which the impact can be managed:	<b>Can be managed</b>
Degree to which the impact can be mitigated:	<b>Can be mitigated</b>
Proposed mitigation:	<p><b>Effluent waste management:</b></p> <ul style="list-style-type: none"> <li>The Contractor will be bound by relevant mitigation measures as detailed in the EMPr.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ul>
Residual impacts:	<b>None</b>
Cumulative impact post mitigation:	<b>Low</b>
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
<b>Potential impact and risk:</b>	<b>Hazardous Waste:</b> 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:	<b>Negative</b>
Extent and duration of impact:	<b>Site Specific, Short-Term</b>
Consequence of impact or risk:	<b>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.</b>
Probability of occurrence:	<b>Improbable</b>
Degree to which the impact may cause irreplaceable loss of resources:	<b>No loss of resources</b>
Degree to which the impact can be reversed:	<b>Reversible</b>

Indirect impacts:	<b>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)</b>
Cumulative impact prior to mitigation:	<b>Low</b>
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
Degree to which the impact can be avoided:	<b>Can be avoided</b>
Degree to which the impact can be managed:	<b>Can be managed</b>
Degree to which the impact can be mitigated:	<b>Can be mitigated</b>
Proposed mitigation:	<p><b><u>Hazardous waste management:</u></b></p> <ul style="list-style-type: none"> <li>• The Contractor will be bound by relevant mitigation measures as detailed in the EMPr.</li> <li>• Drip trays will be available for any vehicles that may be potentially leaking.</li> <li>• Emergency spill kits will be kept on site.</li> <li>• The maintenance must comply with local authority bylaws and all procedures and equipment used must be in accordance with the Occupational Health &amp; Safety Act (No. 85 of 1993).</li> <li>• 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: <ul style="list-style-type: none"> <li>a) the nature of the incident.</li> <li>b) the substances involved and an estimation of the quantity released and their possible acute effect on persons and the environment and data needed to assess these effects.</li> <li>c) initial measures are taken to minimise impacts.</li> <li>d) causes of the incident, whether direct or indirect, including equipment, technology, system or management failure.</li> <li>e) measures taken and to be taken to avoid a recurrence of such incident.</li> </ul> </li> </ul>
Residual impacts:	<b>None</b>
Cumulative impact post mitigation:	<b>Negligible</b>
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low to Medium</b>

<b>OPERATIONAL PHASE</b>	
<b>Potential impact and risk:</b>	<b>Noise:</b> 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:	<b>Negative</b>
Extent and duration of impact:	<b>Site-Specific, Long-Term</b>
Consequence of impact or risk:	<b>Nuisance to surrounding residence</b>
Probability of occurrence:	<b>Improbable</b>
Degree to which the impact may cause irreplaceable loss of resources:	<b>No loss of resource</b>
Degree to which the impact can be reversed:	<b>Completely reversible</b>
Indirect impacts:	<b>Nuisance impacts to surrounding neighbours</b>
Cumulative impact prior to mitigation:	<b>Negligible</b>
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
Degree to which the impact can be avoided:	<b>Can be avoided</b>
Degree to which the impact can be managed:	<b>Can be managed</b>
Degree to which the impact can be mitigated:	<b>Can be mitigated</b>
Proposed mitigation:	<p><b>Noise:</b></p> <ul style="list-style-type: none"> <li>• All occupants will be bound by the relevant local authority by-laws regarding noise generation.</li> <li>• All occupants will be bound by any other relevant noise legislation.</li> </ul>

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
<b>Potential impact and risk:</b>	<b>Traffic:</b> The influx of residential homes could have an impact on traffic in the surrounding area.
Nature of impact:	<b>Negative</b>
Extent and duration of impact:	<b>Site-Specific, Long-Term</b>
Consequence of impact or risk:	<b>Surrounding neighbours are negatively impacted by the influx of cars/public transport users.</b>
Probability of occurrence:	<b>Probable</b>
Degree to which the impact may cause irreplaceable loss of resources:	<b>No loss of resource</b>
Degree to which the impact can be reversed:	<b>Can be reversed</b>
Indirect impacts:	<b>Increase in traffic pressure due to the addition of vehicles and users of public transport</b>
Cumulative impact prior to mitigation:	<b>Negligible</b>
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
Degree to which the impact can be avoided:	<b>Can be partially avoided</b>
Degree to which the impact can be managed:	<b>Can be partially managed</b>
Degree to which the impact can be mitigated:	<b>Can be partially mitigated</b>
Proposed mitigation:	<p><b>Traffic mitigation:</b></p> <ul style="list-style-type: none"> <li>• Implement traffic-calming measures such as narrower roads, speed bumps, and roundabouts to reduce traffic speed and make the area safer and more pedestrian-friendly.</li> <li>• Design streets to discourage non-residential traffic from passing through the development, directing it to main roads instead.</li> <li>• Increase Frequency and Coverage of Public Transit; Expand routes, schedules, and coverage areas to meet the needs of the growing community, ensuring that public transport is a viable alternative to driving.</li> </ul>
Residual impacts:	<b>None</b>
Cumulative impact post mitigation:	<b>Low</b>
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
<b>Potential impact and risk:</b>	<b>Visual:</b> The potential visual impacts associated with the nature of activities are of a cumulative negative nature.
Nature of impact:	<b>Negative</b>
Extent and duration of impact:	<b>Site-specific, Long-Term</b>
Consequence of impact or risk:	<b>Surrounding neighbours are negatively impacted by the addition of the new housing development</b>
Probability of occurrence:	<b>Probable</b>
Degree to which the impact may cause irreplaceable loss of resources:	<b>No loss of resources</b>
Degree to which the impact can be reversed:	<b>Cannot be reversed</b>
Indirect impacts:	<b>Surrounding land and property owners are negatively affected by the visual impact of the new housing development</b>
Cumulative impact prior to mitigation:	<b>Negligible</b>
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
Degree to which the impact can be avoided:	<b>Can be partially avoided</b>
Degree to which the impact can be managed:	<b>Can be managed</b>
Degree to which the impact can be mitigated:	<b>Can be partially mitigated</b>
Proposed mitigation:	Please refer to Section 8 (Point 8.4) of this report.
Residual impacts:	<b>None</b>
Cumulative impact post mitigation:	<b>Low</b>
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
<b>Potential impact and risk:</b>	<b>Solid Waste:</b> 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:	<b>Negative</b>
Extent and duration of impact:	<b>Site-specific, Long-Term</b>

Consequence of impact or risk:	<b>The improper management of solid waste, resulting in the pollution and overall negative impact on the surrounding environment.</b>
Probability of occurrence:	<b>Improbable</b>
Degree to which the impact may cause irreplaceable loss of resources:	<b>No loss of resources</b>
Degree to which the impact can be reversed:	<b>Can be reversed</b>
Indirect impacts:	<b>Pollution of the surrounding environment</b>
Cumulative impact prior to mitigation:	<b>Negligible</b>
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
Degree to which the impact can be avoided:	<b>Can be avoided</b>
Degree to which the impact can be managed:	<b>Can be managed</b>
Degree to which the impact can be mitigated:	<b>Can be mitigated</b>
Proposed mitigation:	<p><b>Solid Waste Management:</b></p> <ul style="list-style-type: none"> <li>All solid waste generated on site will be collected by either the local municipality or a licensed waste contractor.</li> <li>Further, the Applicant will implement an Integrated Waste Management Plan as approved</li> <li>by the DEA&amp;DP (stipulated in the EMPr, <b>Appendix H</b>) and this may include the principles of re-use and recycling of waste.</li> <li>The Applicant will be bound by relevant mitigation measures as detailed in the EMPr.</li> </ul>
Residual impacts:	<b>None</b>
Cumulative impact post mitigation:	<b>Low</b>
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
<b>Potential impact and risk:</b>	<b>Domestic Effluent:</b> No industrial or domestic effluent other than sewage will be generated during the operational phase of the proposed activity.
Nature of impact:	<b>Negative</b>
Extent and duration of impact:	<b>Site-specific, Long-Term</b>
Consequence of impact or risk:	<b>The improper management of domestic effluent, resulting in the pollution and overall negative impact on the surrounding environment.</b>
Probability of occurrence:	<b>Improbable</b>
Degree to which the impact may cause irreplaceable loss of resources:	<b>No loss of resources</b>
Degree to which the impact can be reversed:	<b>Can be reversed</b>
Indirect impacts:	<b>Pollution of the surrounding environment</b>
Cumulative impact prior to mitigation:	<b>Negligible</b>
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>
Degree to which the impact can be avoided:	<b>Can be avoided</b>
Degree to which the impact can be managed:	<b>Can be managed</b>
Degree to which the impact can be mitigated:	<b>Can be mitigated</b>
Proposed mitigation:	<p><b>Solid Waste Management:</b></p> <ul style="list-style-type: none"> <li>Sewage effluent will be disposed of through the Municipal Sewage system.</li> <li>The Applicant will be bound by relevant mitigation measures as detailed in the EMPr (<b>Appendix H</b>).</li> </ul>
Residual impacts:	<b>None</b>
Cumulative impact post mitigation:	<b>Low</b>
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	<b>Low</b>

## 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.
<p>The proposed development entails the establishment of low-income housing on Erf 8270 and Portion 4 of Farm 132, Vredenburg, and comprises the following components:</p> <ol style="list-style-type: none"> <li>Approximately 324 Residential Zone IV erven (UISP) with an average size of 100 m<sup>2</sup>;</li> <li>Six (6) Open Space Zone 1 erven;</li> </ol>	

3. One (1) Institutional Zone II (Church) erf; and
4. One (1) Institutional Zone I (Crèche) erf;

together with the necessary internal services and road infrastructure. The overall development footprint is estimated to cover approximately 8.2575 hectares.

Essential service infrastructure, including stormwater and sewage systems, will be accommodated within the road reserves of the planned internal road network. All associated service infrastructure will have a diameter of less than 350 mm.

The following specialist studies were conducted and incorporated into this Draft Basic Assessment Report (BAR) application:

5. Animal Species Compliance Statement (Enviro-EAP), which was subsequently independently peer reviewed and updated to address protocol compliance requirements;
6. Aquatic Biodiversity Compliance Statement undertaken by EnviroSwift, a suitably qualified and SACNASP-registered freshwater specialist;
7. Plant Species Compliance Statement;
8. Terrestrial Biodiversity Compliance Statement;
9. Agricultural Compliance Statement; and
10. Visual Impact Assessment.
11. Traffic Impact Assessment undertaken by Urban Development Solutions (UDS Africa).

The Traffic Impact Assessment evaluated the anticipated traffic generated by the proposed development and assessed the capacity and operational performance of key surrounding intersections. Based on trip generation modelling appropriate for low-income residential developments with low vehicle ownership rates, the development is expected to generate approximately 210 additional trips during the AM peak hour and 203 additional trips during the PM peak hour. The assessment concluded that the surrounding road network will continue to operate at acceptable Levels of Service, with no significant upgrades required, although the Municipality may consider future improvements to the Southern Bypass Street / Kooftjieskloof Street intersection to enhance traffic flow and safety. The findings of the Traffic Impact Assessment have informed the internal road design and traffic management measures included in the EMPr.

None of the specialist studies or compliance statements identified any biodiversity items of concern. The site has been heavily degraded because of historical agricultural activities and ongoing anthropogenic impacts, including illegal dumping. No sensitive plant or animal species typically associated with the vegetation type were recorded on site, and the site is in a severely poor ecological state. No FEPA wetlands were mapped within the site boundary; however, a FEPA wetland is located approximately 120 m northwest of the site and will not be affected by the proposed development.

Mitigation measures aimed at reducing and softening potential visual impacts on surrounding land uses and road users have been incorporated into the Environmental Management Programme (EMPr), attached as **Appendix H**.

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

#### **Animal Species Compliance Statement**

Based on the findings of the updated and independently peer-reviewed Animal Species Compliance Statement, no site-specific animal species management, mitigation or monitoring measures are required for inclusion in the Environmental Authorisation and its conditions or the Environmental Management Programme (EMPr). This conclusion is based on the confirmed low sensitivity of the site and the absence of Species of Conservation Concern. General environmental management measures contained within the EMPr will nevertheless be implemented as a precautionary measure.

#### **Aquatic Biodiversity Compliance Statement (EnviroSwift)**

Based on the findings of the Aquatic Biodiversity Compliance Statement undertaken by EnviroSwift, no site-specific aquatic management, mitigation or monitoring measures are required for inclusion in the Environmental Authorisation and its conditions or the EMPr. This conclusion is supported by the confirmed low aquatic biodiversity sensitivity of the site and the absence of aquatic features within or adjacent to the development footprint. General stormwater and environmental controls contained within the EMPr will be implemented as a precautionary measure.

#### **Plant Species Compliance Statement**

Based on the findings of the Plant Species Compliance Statement, no site-specific plant species management, mitigation or monitoring measures are required for inclusion in the Environmental Authorisation and its conditions or the EMPr. This is due to the low sensitivity of the site and the absence of Species of Conservation Concern. Standard environmental management measures contained within the EMPr will be applied as a precaution.

#### **Terrestrial Biodiversity Compliance Statement**

Based on the findings of the Terrestrial Biodiversity Compliance Statement, no site-specific terrestrial biodiversity management, mitigation or monitoring measures are required for inclusion in the Environmental Authorisation and its conditions or the EMPr. The site is confirmed to be of low biodiversity sensitivity and is in a highly transformed ecological state. General environmental management measures contained within the EMPr remain applicable.

## **Agriculture Compliance Statement**

The proposed development has effectively applied mitigation through site selection, as the site does not comprise viable or high-value agricultural land. No additional mitigation measures are required for the protection of agricultural production potential, as the site will be permanently excluded from agricultural use. This conclusion is supported by the Agricultural Compliance Statement.

## **Visual Impact Assessment**

### **a. Landscape and Vegetation Measures (where applicable and feasible):**

- i. Tree planting: Introduce indigenous and fast-growing tree species along the site perimeter and internal road networks to soften visual impacts.
- ii. Green corridors: Integrate landscaped open spaces and buffer zones to break up the built form and provide visual relief.
- iii. Retention of existing vegetation: Retain existing trees and natural vegetation where feasible to assist with visual integration.
- iv. Vertical greening: Encourage the use of climbing plants, green walls, or roof gardens where appropriate to reduce visual contrast.

### **b. Architectural and Design Guidelines (where applicable and feasible):**

- i. Earth-tone colours: Use natural, non-reflective colours that complement the surrounding landscape.
- ii. Low-impact materials: Incorporate sustainable and visually recessive materials such as textured finishes or timber elements.
- iii. Variation in rooflines and façades: Avoid monotonous building forms by incorporating varied rooflines, setbacks and façade articulation.

### **c. Screening and Strategic Placement (where applicable and feasible):**

- i. Screening walls and fencing: Utilise natural materials or vegetated screening rather than stark or reflective barriers.
- ii. Setbacks: Apply appropriate building setbacks from key viewpoints to reduce skyline intrusion.
- iii. Lighting control: Minimise night-time visual intrusion by using downward-directed and shielded lighting.

### **d. Phased Development and Monitoring (where applicable):**

- i. Phased implementation: Implement construction in phases, with early establishment of landscaping to reduce visual disturbance.
- ii. Visual monitoring: Monitor the effectiveness of visual mitigation measures during construction and operation and adjust where required.

## **Traffic Impact Assessment**

A Traffic Impact Assessment (TIA) was undertaken by Urban Development Solutions (UDS Africa) to assess the potential traffic impacts associated with the proposed development (Appendix G8).

The TIA assessed the anticipated traffic generated by the proposed 324 low-income residential units together with the institutional land uses (church and creche). Based on the TMH17 trip generation methodology and reduced vehicle ownership assumptions applicable to low-cost housing developments, the proposed development is expected to generate approximately 210 additional trips during the AM peak hour and 203 additional trips during the PM peak hour.

The assessment evaluated key intersections within the surrounding road network, including:

- Southern Bypass Street / Kootjieskloof Street;
- R45 / Toermalyn Street; and
- Toermalyn Street / Kootjieskloof Street.

The results of the SIDRA modelling indicate that the surrounding road network will continue to operate at acceptable Levels of Service, although localized delays may occur at the Southern Bypass Street / Kootjieskloof Street intersection during future peak periods. The TIA recommends that the Municipality consider upgrading this intersection to either a roundabout or signalised control in the future to improve traffic flow and safety.

No significant upgrades are required at the R45 / Toermalyn Street or Toermalyn Street / Kootjieskloof Street intersections as a result of the proposed development.

	Overall, the TIA concludes that the proposed development will not result in unacceptable impacts on the surrounding road network, provided that standard road safety measures and traffic management practices are implemented during construction and operation.
3.	List the specialist investigations and the impact management measures that will <b>not</b> be implemented and provide an explanation as to why these measures will not be implemented.
	N/A. Refer above.
4.	Explain how the proposed development will impact the surrounding communities.
	A low-income housing development can have a positive impact on surrounding communities by promoting economic growth and stability. It can create job opportunities during the construction phase and attract new businesses and services once completed, boosting local economies. Additionally, it can provide affordable housing options for families who might otherwise struggle to find a place to live, reducing homelessness and overcrowding in nearby areas. By integrating with existing infrastructure, such developments can foster diversity and inclusivity, encouraging stronger social ties and community support systems. Furthermore, they can revitalize underdeveloped or neglected areas, improve public spaces and increase overall community well-being.
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.
	Climate change can lead to increased temperatures, more intense storms, flooding, and changes in precipitation patterns, which may affect the development's long-term sustainability and safety. For instance, higher temperatures can put strain on energy systems, while severe weather events like heavy rainfall or floods could overwhelm drainage systems and damage infrastructure.  To address these potential impacts, the development can incorporate climate resilience measures. This could include designing buildings with energy-efficient materials to reduce heat absorption, installing sustainable drainage systems to manage stormwater, and choosing flood-resistant construction techniques. Additionally, creating green spaces and planting trees can help manage heat and improve air quality, while also enhancing the visual impact and social value of the area. Planning for climate resilience through thoughtful design, investment in sustainable infrastructure, and community engagement can help reduce risks and ensure the development remains safe and liveable in the face of climate change.
6.	Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.
	N/A. There are no conflicting recommendations between specialists.
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.
	All specialist studies concluded that the ecological value of the proposed site has been significantly reduced as a result of historical agricultural activities, illegal dumping and ongoing anthropogenic disturbance.  With respect to terrestrial animal species, the Animal Species Compliance Statement originally prepared for the site was subjected to an independent peer review undertaken by a suitably qualified and SACNASP-registered faunal specialist (Wildlife Conservation Decision Support). Following the peer review, the statement was updated to address protocol compliance requirements. The updated and peer-reviewed Animal Species Compliance Statement confirms that the site is of low terrestrial animal sensitivity and is unlikely to support Species of Conservation Concern. The site has been extensively transformed and offers limited suitable habitat for faunal species. The peer review confirmed that the conclusions of the compliance statement are scientifically sound and consistent with the ecological context of the site. The proposed development is therefore expected to result in a very low impact on terrestrial animal species.  The vegetation on site is severely degraded, with no sensitive plant species present. The Saldanha Flats Strandveld vegetation type is no longer intact due to historical transformation and ongoing anthropogenic impacts. Conservation mapping indicates that portions of the site are mapped as Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs); however, on-site verification confirmed that transformation has compromised the ecological functionality of these areas. The site further has limited agricultural potential due to poor soil characteristics and climatic constraints, rendering it unsuitable for rain-fed crop production. Consequently, the proposed development is considered to have a low agricultural impact, and from both an environmental and agricultural perspective, is supported.  An additional Aquatic Biodiversity Compliance Statement was undertaken by EnviroSwift, a suitably qualified and SACNASP-registered freshwater specialist, following engagement with the competent authority. The assessment confirmed that no aquatic features occur on site or within the immediate development footprint and that the site is of low aquatic biodiversity sensitivity. Based on the findings of the various specialist studies, including the updated and peer-reviewed Animal Species Compliance Statement and the additional Aquatic Biodiversity Compliance Statement undertaken by EnviroSwift, no site-specific mitigation measures were recommended by the specialists. This is due to the confirmed low sensitivity of the site for terrestrial animal species and aquatic biodiversity, as well as the highly transformed ecological state of the site. The application of the mitigation hierarchy therefore confirms that no additional avoidance, minimisation, rehabilitation or offset measures are required. General environmental management measures contained within the Environmental Management Programme (EMPr) will nevertheless be implemented as a precautionary measure.

8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.
<p>Based on the findings of the various specialist studies, including the updated and peer-reviewed Animal Species Compliance Statement and the additional Aquatic Biodiversity Compliance Statement, no site-specific mitigation measures were recommended by the specialists. This conclusion is based on the confirmed low sensitivity of the site for terrestrial animal species and aquatic biodiversity, as well as the highly transformed ecological state of the site. The application of the mitigation hierarchy therefore confirms that no additional avoidance, minimisation, rehabilitation or offset measures are required, beyond the implementation of standard environmental management measures contained within the Environmental Management Programme (EMPr) as a precaution.</p>	

## SECTION J: GENERAL

### 1. Environmental Impact Statement

1.1.	Provide a summary of the key findings of the EIA.
<p>The proposed development entails the establishment of low-income housing on Erf 8270 and Portion 4 of Farm 132, Vredenburg, covering an area of approximately 8.2575 hectares. The development will comprise 324 residential erven (with an average size of 100 m<sup>2</sup>), six (6) open space erven, and two (2) institutional erven (for a church and a crèche), together with the necessary internal services and road infrastructure. Essential services, including stormwater and sewage systems, will be accommodated within the planned internal road reserves, with associated infrastructure having a diameter of less than 350 mm.</p> <p>Specialist studies conducted for the project include an Animal Species Compliance Statement prepared by Enviro-EAP, which was subsequently independently peer reviewed and updated to ensure full compliance with the gazetted specialist assessment protocols, as well as an Aquatic Biodiversity Compliance Statement undertaken by EnviroSwift, a suitably qualified and SACNASP-registered freshwater specialist. These were supported by compliance statements relating to plant species, terrestrial biodiversity, and agriculture. All specialist studies confirmed low sensitivity ratings and concluded that the proposed development will not result in significant environmental impacts or biodiversity concerns.</p> <p>The site has been heavily degraded as a result of historical agricultural activities, illegal dumping, and ongoing anthropogenic disturbance. No sensitive plant or animal species were recorded on site, and the Saldanha Flats Strandveld vegetation type is no longer intact due to extensive transformation. The Aquatic Biodiversity Compliance Statement prepared by EnviroSwift confirmed that no aquatic features, wetlands, or watercourses occur on site or within 32 m of the proposed development footprint. A mapped FEPA wetland is located approximately 100–120 m northwest of the site boundary and will not be impacted by the proposed development. The site was therefore confirmed as being of low aquatic biodiversity sensitivity, with no aquatic-related mitigation or authorisation requirements applicable. Conservation mapping indicates that portions of the site are mapped as Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs); however, site verification confirmed that transformation has compromised the ecological functionality of these areas. The agricultural potential of the site is limited due to poor soil characteristics and climatic constraints, rendering it unsuitable for rain-fed crop production.</p> <p>Overall, the proposed development is expected to have a low impact on the receiving environment and agricultural potential, and no site-specific mitigation measures were recommended by the specialists, beyond the implementation of general environmental management measures contained within the Environmental Management Programme (EMPr) as a precaution. The proposed low-income housing development is anticipated to have positive socio-economic benefits by creating employment opportunities during construction, supporting local economic activity, providing affordable housing, and contributing to improved social cohesion and community well-being. The development will integrate with existing infrastructure, promote inclusivity, and assist in revitalising underdeveloped areas. Based on the findings of the assessment, the proposed development is recommended for approval.</p>	
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)
SDP attached as <b>Appendix B1</b> . There are no environmentally sensitive areas on site, as confirmed by the various specialist assessments.	
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.
<p>The proposed low-income housing development will bring several positive outcomes to the surrounding community and environment. First and foremost, it will address the need for affordable housing, providing essential homes for low-income families and alleviating issues of overcrowding and homelessness. This will help improve the quality of life for residents. The development will also create job opportunities during the construction phase, stimulate local businesses, and attract services that will boost the regional economy. Additionally, by integrating the development with existing infrastructure, the project will support urban growth in a more sustainable and inclusive way. The revitalization of a currently degraded site, which has been impacted by previous agricultural activities and illegal dumping, will lead to an improved public space and a better-quality environment for residents. Ultimately, this development will foster a more connected, diverse community with stronger social ties.</p> <p>While the project offers significant benefits, there are some potential negative impacts. The site, though heavily degraded, was previously identified as a Critical Biodiversity Area (CBA) and an Ecological Support Area (ESA), which may have led to confusion</p>	

about its ecological value. However, the area has already been significantly transformed by agricultural practices and urban sprawl, so the ecological impact of the development is minimal. Additionally, while the site has limited agricultural potential due to poor soil and climate conditions, its conversion to non-agricultural use eliminates any possible future agricultural productivity. Furthermore, the increased population could place additional pressure on local infrastructure such as water and waste management systems, though this will be managed by the provision of necessary services within the development.

## 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
<p>The general pre-construction, construction, and close-out phase as well as site management measures to minimise health, safety and environmental risk associated with the development, which are contained in the EMPr in <b>Appendix H</b>, should be adhered to. Impact management, mitigation, and monitoring measures are captured in the impact assessment and significance rating, as well as in the Environmental Management Plan/Programme (EMPr) attached as <b>Appendix H</b>.</p> <p>The EMPr forms part of the contractual obligations to which all persons including but not limited to, contractors/sub-contractors or employees involved in the proposed development works, must be committed. It also serves as a baseline information document for the project applicant and any entity working on behalf of the applicant, during the various phases of the proposed activity. The EMPr aims to comply with Section 24N of the National Environmental Management Act No. 107 of 1998, as amended (NEMA), as well as any additional specific information requested by any government department, including the regulating authority for this specific project, the DEA&amp;DP. The overall objective of the EMPr is to direct and guide all responsible parties, binding all contractors, sub-contractors, and all other persons working on the site to adhere to the terms and conditions of the EMPr during the pre-construction, construction and close-out phases of the project. The overall outcome of the EMPr is to prevent avoidable damage and/or minimize or mitigate unavoidable environmental damage associated with the pre-construction, construction and close-out phases of the proposed project. The specific outcomes of the EMPr will be achieved by ensuring that the mitigation and management measures detailed in the EMPr are implemented and adhered to throughout the project duration. Compliance monitoring and independent assessment/auditing allow the verification of achievement of the EMPr outcomes and ultimately, fulfilment of the EMPr objectives.</p> <p><b>The EMPr:</b></p> <ul style="list-style-type: none"> <li>identifies project activities that could cause actual environmental damage (or potential environmental risks) and provides a summary of actions required;</li> <li>identifies persons responsible for ensuring compliance with the EMPr;</li> <li>provides standard procedures to avoid and/or minimize the identified negative environmental impacts and to enhance the positive impact of the project on the environment;</li> <li>provides the site and project-specific rules and actions required, including a site plan/s showing: <ul style="list-style-type: none"> <li>areas where construction, maintenance, or demolition work may be carried out;</li> <li>areas where any material or waste may be stored;</li> <li>allowed access routes, parking, and turning areas for construction or construction-related vehicles;</li> </ul> </li> <li>forms a written record of procedures, responsibilities, requirements, and rules for contractor/s, their staff, and any other person who must comply with the EMPr;</li> <li>provides a monitoring and auditing program to track and record compliance and identify and respond to any potential or actual negative environmental impacts; and</li> <li>provides a monitoring program to record any mitigation measures that are implemented</li> </ul>	
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.
N/A	
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.
<p>The proposed low-income housing development should be approved due to its overall positive impact on the community and minimal environmental and agricultural concerns. The site is heavily degraded, with no sensitive species or valuable biodiversity remaining, as it has already been significantly transformed by agricultural and urban activities. The development will provide much-needed affordable housing for low-income families, addressing issues such as overcrowding and homelessness, while also fostering economic growth through job creation and the attraction of new businesses and services. Additionally, the integration with existing infrastructure and the revitalization of an underused area will contribute to a more sustainable and inclusive urban environment. Given the low environmental impact, limited agricultural value of the site, and the extensive benefits to the community, the development is well-aligned with broader planning goals and should be supported. <b><u>It is therefore recommended that this application be authorised with the necessary conditions of approval as described throughout this BAR and the EMPr (Appendix H).</u></b></p>	
2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.
<p><b>Assumptions</b></p> <p>It is assumed that all information presented in this report is accurate and valid. The impacts discussed may change once the project is underway, due to unforeseen real-world events. The identified impacts and proposed mitigation measures are based</p>	

on the current information. It is also assumed that the mitigation measures outlined in this report and the EMPr (Appendix H) will be implemented and followed. The impact assessment and recommended mitigations were informed by site-specific ecological observations from the site visit, as well as the assessor's expertise and experience with similar projects.

**Uncertainties**

It is assumed that management will responsibly address incidents as they arise, investigating their causes and taking corrective actions where necessary. An HSE consultant will be appointed to assist management in ensuring compliance with the Occupational Health & Safety Act. It is also assumed that the available data, including Topocadastral maps, vegetation and water resource maps, orthophotographs, geological maps, and information from the DWS national groundwater database, are reasonably accurate. Additionally, it is assumed that all specialist input and information extracted from specialist reports are correct.

**Gaps in Knowledge**

There are no significant gaps in knowledge for the proposed project.

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.

I.	The period in which commencement must occur;	5 years
II.	The period for which the environmental authorisation is granted and the date on which the development proposal will have been concluded, where the environmental authorisation does not include operational aspects;	TBC
III.	The period for which the portion of the environmental authorisation that deals with non-operational aspects is granted; and	5 years
IV.	The period for which the portion of the environmental authorisation that deals with operational aspects is granted.	The operational phase is permanent

**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.

Non-potable water will be used, where possible, for all construction and mitigation activities on site. Potable water will only be used as drinking water on site.

**4. Waste**

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

All waste generated on-site (general and hazardous), must be collected, consolidated in dedicated bins, removed, and disposed of at registered disposal facilities (registered landfill sites). Any hazardous waste discovered will also be disposed of according to the applicable and appropriate measures. Waste must be separated into recyclable and non-recyclable material and disposed of at a dedicated recycling point (where applicable). Waste receipts are required as proof of safe disposal. The convention of separate waste containment and removal of recyclable waste is envisaged during the operational phase.

**5. Energy Efficiency**

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

Please refer to the Generic Energy Demand Management Plan (Appendix C) within the **EMPr (Appendix H)**.

## 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.

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Signature of the Applicant:

Date:

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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;

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Signature of the EAP:

Date:

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Name of company (if applicable):