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21 August 2026

Attention: To Whom it May Concern.

RE: TERRESTRIAL BIODIVERSITY OFFSET LETTER AND REQUEST FOR COMMENT – PROPOSED MIXED-USE DEVELOPMENT, PORTION 4 OF PORTION 4 OF FARM 560, YZERFONTEIN

1. Introduction

The Biodiversity Company was requested to provide a terrestrial biodiversity offset opinion for the proposed mixed-use development on Portion 4 of Portion 4 of Farm 560, Yzerfontein, Western Cape. This letter is intended to allow for early engagement with the commenting and competent authorities and to obtain comment on the terrestrial biodiversity offset strategy.

The previous Environmental Authorisation (Application) for the project was withdrawn, and the project is restarting the application process. This letter is therefore framed as part of a new, independent terrestrial biodiversity offset strategy informed by the existing specialist evidence and intended to support early alignment on the appropriate offset strategy.

This letter is based on a review of the currently available terrestrial biodiversity information for the site/project. It is assumed that this Letter and the referenced reports will be viewed in conjunction, this letter will not restate information that is contained within.

Including, but not limited to (note additional texts/reports will be referenced):

- Black, Wesley. 2026. Review of Terrestrial Biodiversity Features Relevant to the New Offset Process. Proposed Mixed-Use Development, Portion 4 of Portion 4 of Farm 560, Yzerfontein. Letter Dated 17 July 2026;
- Helme, N. 2008. Botanical Sensitivity Study of Portion 4 of Farm 560, Yzerfontein. Nick Helme Botanical Surveys;
- Keet, Jan-Henderik. 2025a. Addendum to report number PR.25.030, titled “Botanical survey to identify Saldanha Limestone Strandveld on farms Yzerfontein 560 (partly), Tygerfontein 564, Coffee Fontein 563, Plot 2717, and the green corridors within Yzerfontein, Western Cape” as prepared by EcoFloristix Specialist Botanical Surveys; and
- Keet, Jan-Henderik. 2025b. Botanical Survey to Indentify Saldanha Limestone Strandveld on Farms Yzerfontein 560 (partly), Tygerfontein 564, Coffee Fontein 563, Plot 2717 and the Green Corridors within Yzerfontein, Western Cape. EcoFloristix Specialist Botanical Surveys. Report prepared for Jos de Villiers Belleggings Trust. Final Report, Version 1.1. Reference: PR.25.030.

The above-mentioned reports are being used to specifically inform a new offset strategy. Note that Dr Candyce Areington (Pr. Sci. Nat. 167868) went to site on the 4th of August 2026, her field observations have also provides evidence and informed this letter. The purpose of this letter is to provide a concise, evidence-based terrestrial biodiversity offset interpretation and to set out indicative ratio scenarios for comment. It does not constitute a final biodiversity offset report or a finalised offset strategy.

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2. Project History and Biodiversity Planning Context

Based on the available specialist information (Helme, 2008; Keet 2025a and b), the site occurs within a high-sensitivity terrestrial biodiversity landscape in Yzerfontein, characterised by association with Western Cape Biodiversity Spatial Plan (WCBSP, 2023), Critical Biodiversity Area (CBA) features, important ecological corridor and process functions, the presence of multiple threatened vegetation types [viz. Endangered (EN)], and habitat supporting Species of Conservation Concern.

The botanical and terrestrial studies (Helme, 2008; Keet 2025a and b) consistently indicate that limestone-associated habitat is the primary terrestrial biodiversity constraint on the property. The historical (Helme, 2008) and recent specialist (Keet 2025a and b) work together confirm the presence of the following vegetation types or habitat systems within the broader site context:

- Saldanha Limestone Strandveld;
- Saldanha Flats Strandveld;
- Hopefield Sand Fynbos;
- Saldanha Granite Strandveld; and
- Langebaan Dune Strandveld or dune/thicket-related units in parts of the more recent vegetation interpretation.

The older botanical work (Helme, 2008) identified a large central 'High' conservation value area as the ecological core of the property and recommended that this area remain undeveloped. The recent botanical survey (Keet 2025 a and b) further confirmed the presence of numerous discrete Saldanha Limestone Strandveld fragments, including inland limestone units and coastal limestone fragments, the majority of which were assessed to be in pristine condition and of 'Very High' conservation value. Helme (2008) delineated based off field work, observations and already existing vegetation types; while Keets (2025 a and b) utilised ground-truthing, statistical analysis and modelling to more accurately delineate these habitats. Note that Black 2026 combined and analysed all the available information to obtain the delineations used in this letter and calculations (*Figure 1*).

It is important to note that for the purposes of this letter and the offset strategy being discussed the following habitats that are overlapped by development are being treated as:

- Ecotone/Transition Zone [treated as Langebaan Dune Strandveld (EN)-related habitat];
- Strandveld Thicket [treated as Langebaan Dune Strandveld (EN)-related habitat]; and
- Valley Bottom Strandveld [treated as Saldanha Flats Strandveld (EN)-related habitat].

Current layout information, as provided for this drafting exercise, confirms that all mapped and confirmed limestone habitat has been avoided by the development footprint. This is an important design element for the terrestrial biodiversity offset interpretation, as the most sensitive terrestrial feature identified in the specialist record is not included within the residual impact footprint.

The July 2026 review (Black, 2026) further indicates that approximately 72 ha of CBA 1 is understood to overlap the current development footprint (*Figure 2*), and that the project's biodiversity acceptability depends on a combined approach of avoidance, retention of ecologically meaningful natural areas, conservation of a substantial core conservation area, and offsetting of residual impacts that cannot be avoided.

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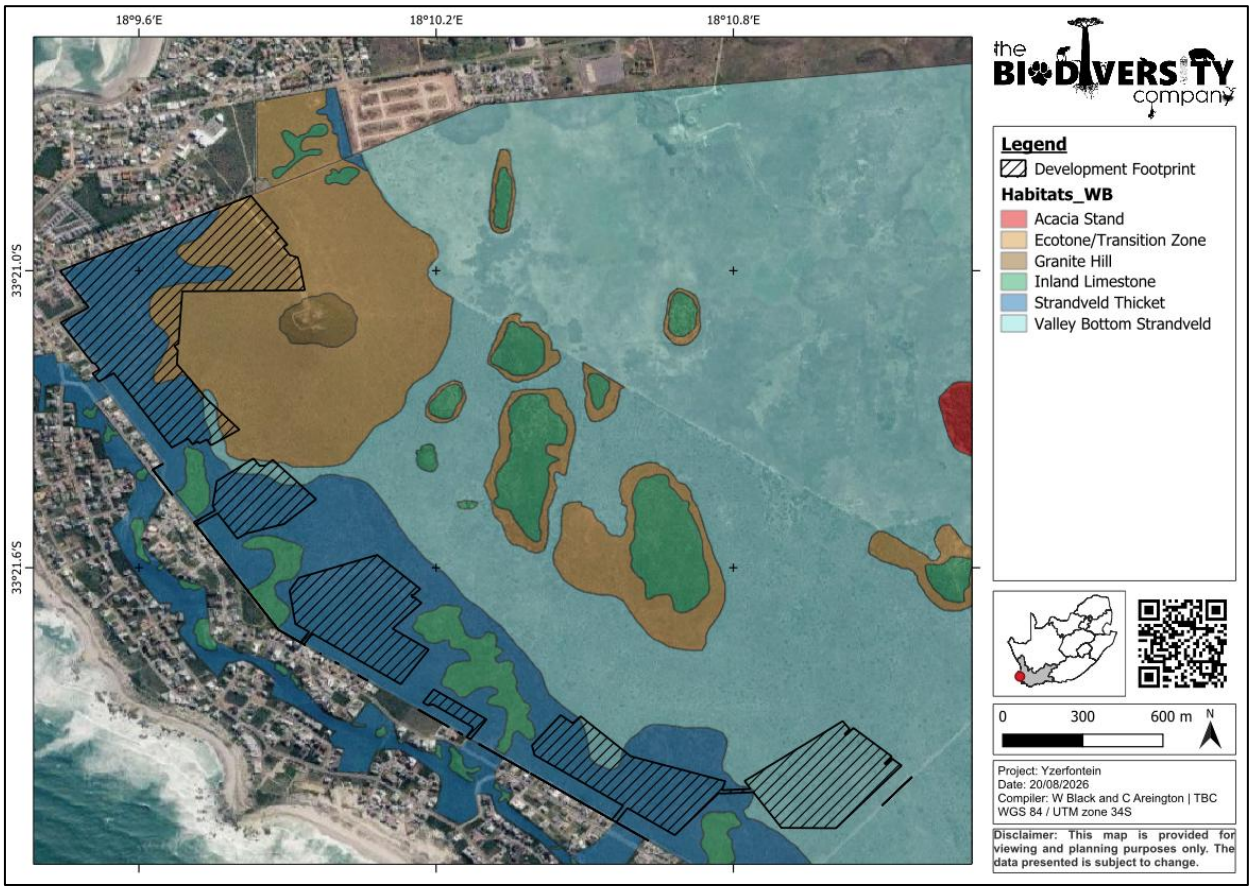

Figure 1 ***Development Footprint Overlaid onto Habitat Delineations by Keet 2025 a and b.***

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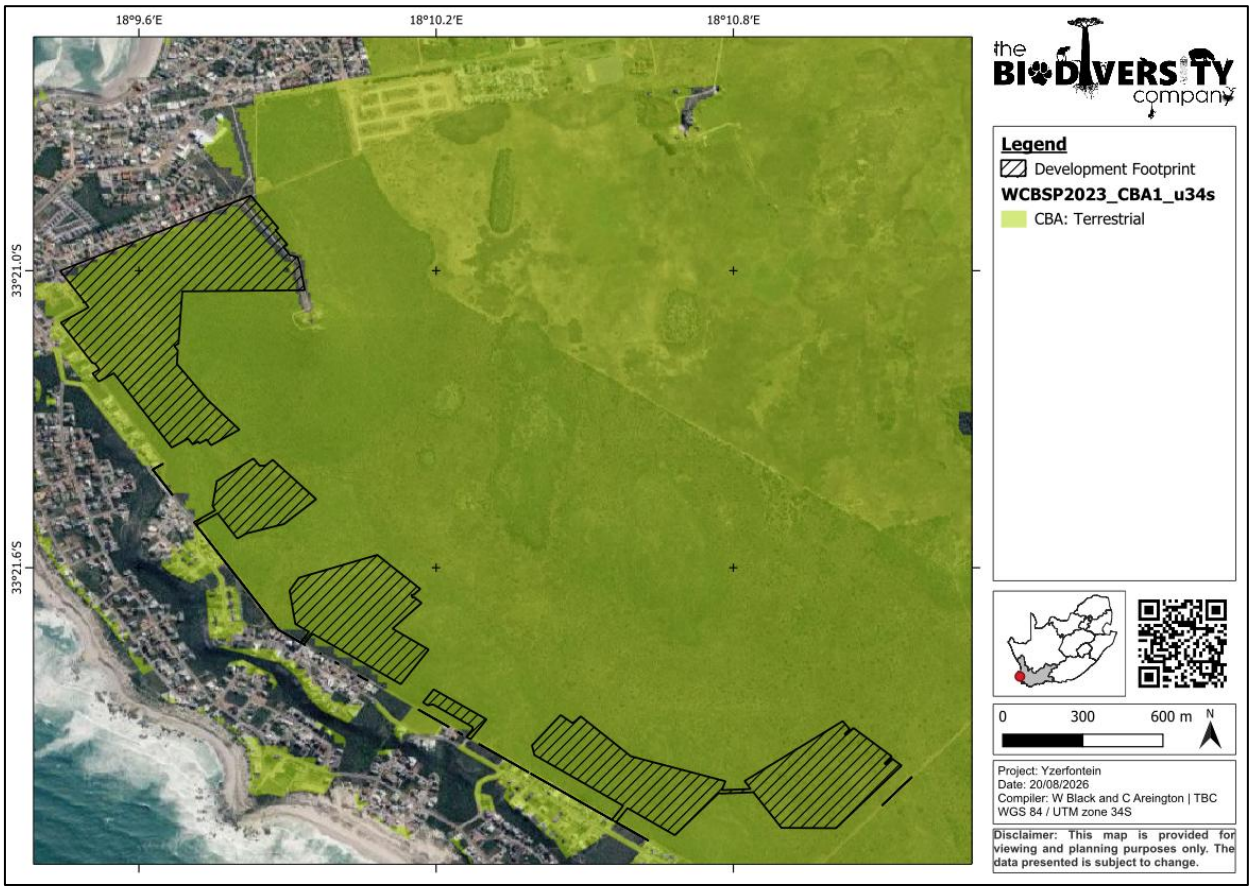

Figure 2 Development Footprint Overlaid onto the WCBSP CBA.

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3. Summary of Baseline Findings Relevant to Offsetting

Table 1 below summarises the key confirmed biodiversity findings, their relevance to the proposed mitigation and offset strategy, and the principal uncertainties requiring resolution before the any offset requirements can be finalised.

Table 1 Baseline Findings that are Relevant to Offsetting

Topic	*Confirmed finding*	*Offset relevance*
Limestone habitat	*Saldanha Limestone Strandveld is present on and around the site and is identified as the most sensitive terrestrial habitat on the property. The final layout avoids all mapped and confirmed limestone habitat.*	*This is a material mitigation outcome. Limestone habitat is treated as a no-go area and does not form part of the impacted development footprint.*
Impacted threatened vegetation	*The current layout impacts the following habitat units: Ecotone / Transition Zone, treated as Langebaan Dune Strandveld-related habitat (9.86 ha, Endangered); Strandveld Thicket, treated as Langebaan Dune Strandveld-related habitat (47.80 ha, Endangered); and Valley Bottom Strandveld, treated as Saldanha Flats Strandveld-related habitat (13.98 ha, Endangered). The total impacted terrestrial habitat is 71.64 ha.*	*This confirms that the residual impact is to Endangered intact habitat, notwithstanding avoidance of limestone habitat.*
CBA 1 context	*Approximately 71.65 ha of the current development footprint overlaps CBA 1. CBA 1 is defined as areas in a natural condition that are required to meet biodiversity targets for species, ecosystems, ecological processes and ecological infrastructure.*	*This confirms that the residual impact occurs within a biodiversity priority area where further habitat loss is generally not preferred, and supports the need for a terrestrial biodiversity offset.*
Species of Conservation Concern	*The botanical studies recorded multiple SCC plant species. Most of the SCC are associated with Limestone strandveld and Hopefield sand fynbos. All listed SCC populations are well represented in non-impacted portions of the site, and these retained areas are proposed as part of the set-aside area outlined below.*	*This project does impact current SCC locations however; these species are well represented across the proposed set aside area and therefore the local populations will remain and that the retained/set-aside areas would contribute to the conservation of those populations.*
Core conservation area	*A large retained natural area on the property is regarded by the specialist studies as ecologically meaningful.*	*This supports the mitigation hierarchy, strengthens the retained biodiversity network on site, and contributes to the overall conservation outcome.*
Corridor function	*Ecological corridors and north-south linkages are identified as important across the site and have been incorporated into the design of the layout.*	*This confirms that connectivity remains an important component of the mitigation and offset strategy.*
Residual impact context	*Some non-limestone medium- and high-sensitivity habitat remains affected after layout refinement.*	*This confirms that a terrestrial biodiversity offset is required for the remaining impacted habitat units.*

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4. Offset-Relevant Specialist Interpretation

4.1 Avoidance of Saldanha Limestone Strandveld

The strongest and most consistent finding across the available botanical and terrestrial information is that Saldanha Limestone Strandveld remains the primary biodiversity feature of concern on the broader property (Helme, 2008, Keet, 2025 a and b). The Keet (2025) botanical survey confirms numerous limestone fragments in the study area, including inland limestone "islands" and coastal limestone units, and indicates that the overwhelming majority of these fragments are in pristine condition and of 'Very High' conservation value (*Figure 4*).

Current layout information confirms that all mapped and confirmed limestone habitat has been avoided by the development footprint (*Figure 3*). This is an important mitigation outcome. Confirmed limestone habitat is therefore not included in the residual terrestrial biodiversity impact footprint and should be treated as retained habitat within the broader conservation context of the site.

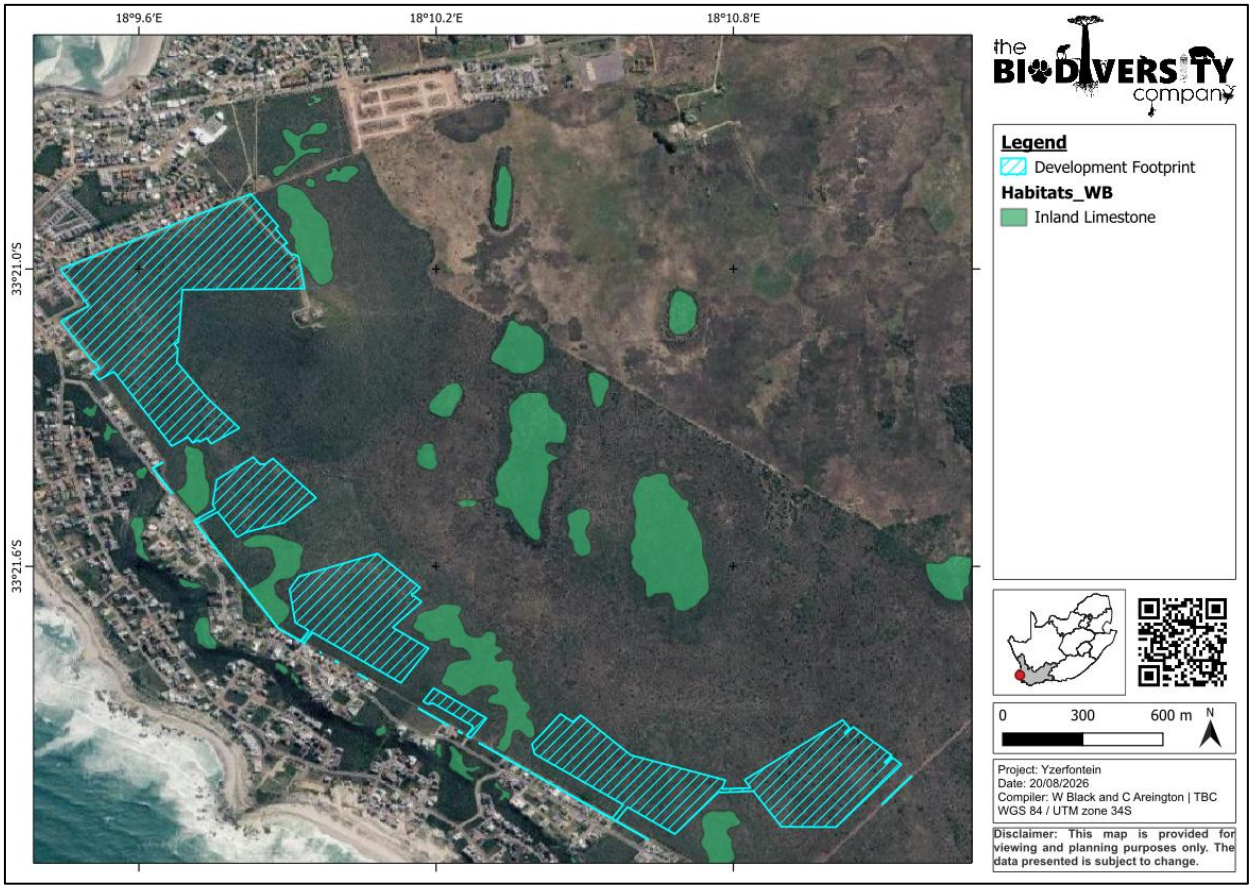

Figure 3 ***Development Footprint in Relation to the Inland Limestone Habitats.***

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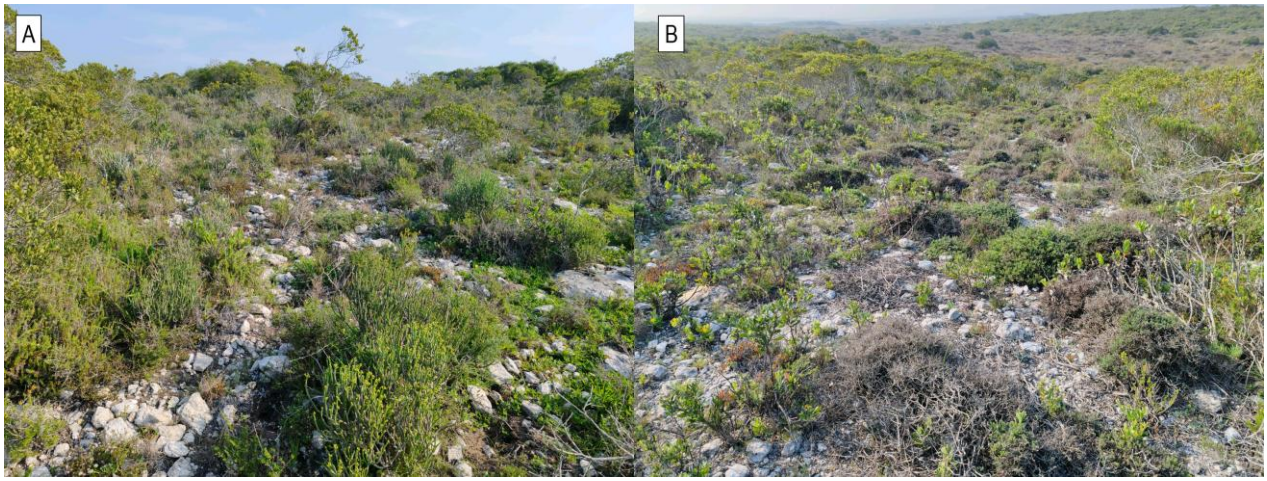

Figure 4 Example of Inland Limestone Habitats Observed in 2026 within the Study Area (photos taken by Dr Candyce Areington,4 August 2026)

4.2 Remaining impacted terrestrial habitat units

The current residual habitat accounting provided for this exercise indicates that the remaining impacted terrestrial units comprise Ecotone / Transition Zone, Strandveld Thicket, and Valley Bottom Strandveld. These units remain biodiversity-relevant and occur within a broader CBA-linked and urban-edge context.

Helme (2008) and Keet (2025a and 2025b) used different nomenclature for certain vegetation units, reflecting differences in mapping approach and reporting format. Helme delineated habitats and sensitive areas based on field observations and available vegetation information, whereas Keet statistically delineated vegetation units across the site and then indicated how these units should be interpreted in relation to the Mucina and Rutherford vegetation map. Although the unit names differ between the two studies, both identify broadly corresponding sensitive areas, and these have informed the project layout. The current layout can therefore be regarded as having undergone two rounds of biodiversity-informed refinement. For purposes of the present offset interpretation, the relevant vegetation units, their interpretation, and the associated footprint overlap are set out above and summarised in Table 1.

4.3 Species of Conservation Concern and corridor context

The species diversity seen within the botanical surveys (Helme, 2008 and Keet, 2025a and b) strengthen the biodiversity case for caution. For example Helme (2008) recorded multiple flora Species of Conservation Concern (SCC), largely associated with limestone habitat and Hopefield Sand Fynbos. While Keet (2025a and b) recorded 19 flora SCCs and stated that most SCC occurred within Saldanha Limestone Strandveld and Hopefield Sand Fynbos. Note that during the 4th August 2026 visit most of these species were confirmed.

While the confirmed avoidance of limestone habitat materially reduces the severity of the residual terrestrial impact profile, the broader SCC, ecological corridor, and ecological process context remains relevant to interpretation of the remaining impacted area and the role of retained habitat.

4.4 Corridors, buffers and retained natural areas

All specialists consistently indicate that ecological connectivity is important on the site. The available work supports retention of north-south and broader coastal ecological linkages and the avoidance of infrastructure

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crossing the most sensitive areas. From this a minimum 100 m corridor width for key ecological corridors was incorporated into the layout design due to a suggestion by Helme (*Figure 5*), these measures remain important because the terrestrial biodiversity significance of retained land is not determined only by vegetation type, but also by spatial linkage, buffering role, ecological function and contribution to a coherent conservation network.

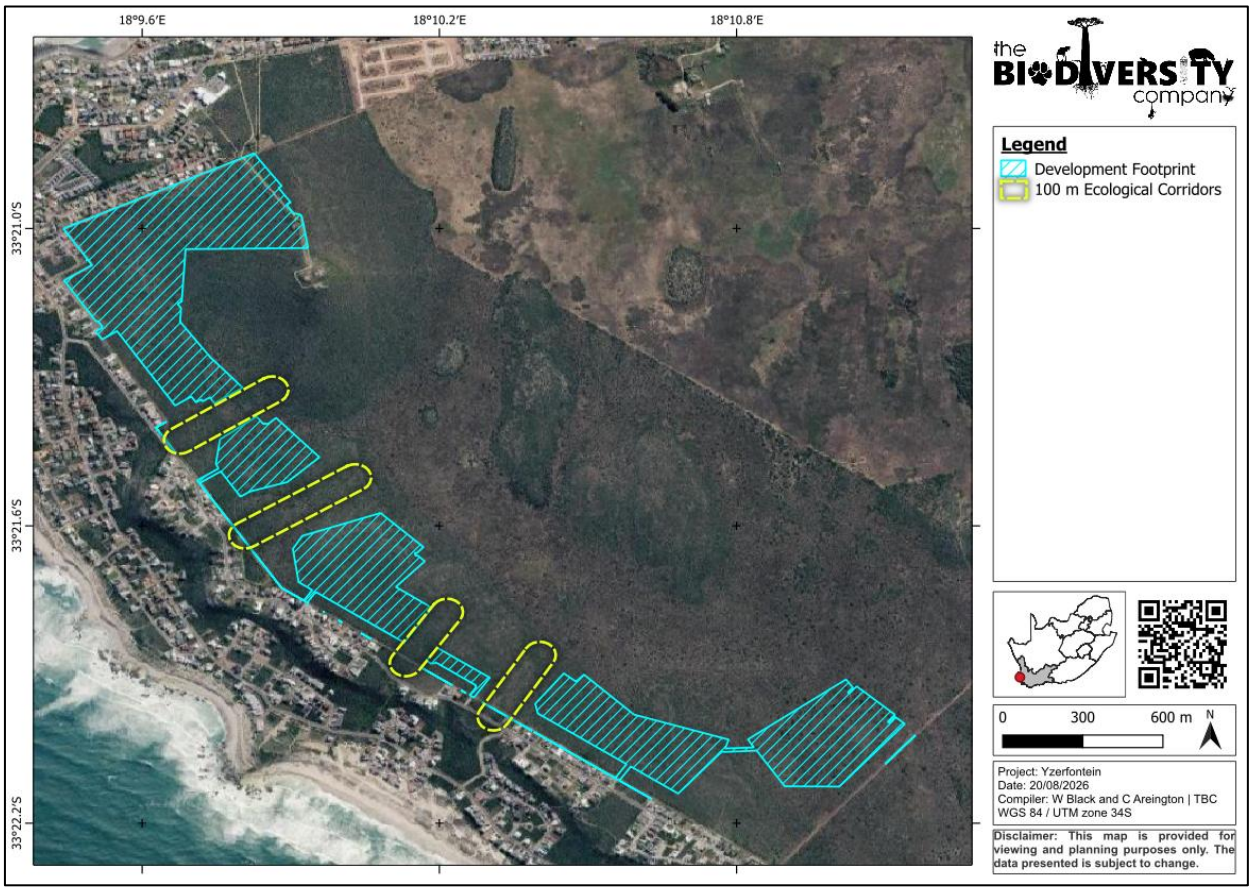

Figure 5 ***Development Footprint and 100 m Ecological Corridors.***

5. Residual Impact Context

The available documentation indicates that the project layout has undergone meaningful biodiversity-related refinement. This includes confirmed avoidance of all mapped and confirmed limestone habitat, together with retention of substantial open space and avoidance of at least some of the most sensitive terrestrial features.

Notwithstanding the above, the available evidence indicates that meaningful residual terrestrial biodiversity impacts are still likely to remain in relation to the remaining non-limestone habitat units. Some medium- and high-sensitivity habitat remains affected, threatened vegetation types remain implicated in the footprint, and the current terrestrial biodiversity information base continues to support offset consideration.

The residual terrestrial biodiversity impact question therefore relates principally to the remaining impacted non-limestone habitat units and their biodiversity planning context, including the CBA 1 overlap, habitat

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condition, ecological function, and recognised Urban-Edge setting. Note that the development is occurring within the Urban Edge (*Figure 6*).



Figure 6 2025 Amendment of the Swartland Municpal Spatial Development Framework (2023-2027)1 and the General Area of the Development Footprint (Indicated with a Blue Star).

1 https://www.swartland.org.za/assets/town-planning/docs/Yzerfontein_Proposals_Apr_2025.pdf

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6. Offset Position

6.1 Provisional position

Based on the available terrestrial biodiversity information even though there is confirmed avoidance of all limestone habitat, the vegetation Ecosystem Threat Status (EN), CBA 1 classification, and loss of SCCs will mean that the mitigation hierarchy cannot effectively mitigate impacts to a low residual impact and offsets are necessary.

6.2 Guideline interpretation

Three offsetting documents were consulted in the development of the following sections:

Provincial:

- Department of Environmental Affairs and Development Planning (DEA&DP) 2015. Western Cape Guideline on Biodiversity Offsets. Prepared by Susie Brownlie and Mark Botha for DEA&DP, Cape Town;
- Department of Environmental Affairs and Development Planning (DEA&DP) 2020. The Saldanha Strategic Offset Strategy (SSOS) 2020; and

National:

- Department of Environment Affairs (DEA) 2023. National Environmental Management Act, 1998 (Act No. 107 of 1998) Draft National Biodiversity Offset Policy.

Under the National Biodiversity Offset Policy (DEA, 2023), areas classified as CBA 1 are associated with a high initial offset ratio and are generally considered irreplaceable due to their elevated conservation importance and limited capacity for substitution. Nevertheless, the policy recognises that, where impacts occur within an urbanised or transformed landscape, there may be a scientifically defensible basis for reducing the initial ratio, provided that this adjustment is supported by site-specific evidence regarding ecological condition, landscape connectivity, persistence, representativeness and the feasibility of securing and managing an appropriate offset-receiving area.

Under the Western Cape provincial guideline (DEA&DP, 2015), offset ratios within a recognised urban edge are substantially lower than those outside the urban edge, and in this case a 1:1 for Endangered ecosystems.

The Saldanha Strategic Offset Strategy (SSOS, 2020) was utilised as a relevant regional reference because it assigns ecosystem-specific conservation value and offset ratios to vegetation types occurring within the broader Saldanha region. Its application is considered appropriate to the Yzerfontein assessment because the affected area contains comparable West Coast vegetation units and associated habitat types, thereby providing a scientifically relevant basis for contextualising potential offset requirements. Rather than applying a uniform ratio to all impacted terrestrial habitats, the strategy supports a differentiated, ecosystem-based approach in which offset ratios are informed by the relative conservation importance, ecological condition, irreplaceability, spatial distribution and landscape context of each affected vegetation unit.

Given the confirmed avoidance of all mapped Limestone habitat, applying a fixed 30:1 offset ratio to the CBA 1 component would likely overestimate the terrestrial offset requirement by failing to account for the avoided irreplaceable habitat. However, applying a uniform 1:1 ratio would risk underestimating the conservation significance of the remaining good-condition, non-limestone habitat that would still be affected.

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A scientifically defensible approach would therefore be to apply a differentiated, habitat-specific offset ratio, informed by the condition, conservation importance, ecological connectivity and spatial context of each residual impacted vegetation unit.

6.3 Working ratio position for authority comment

For present planning purposes and based on the currently understood good ecological condition of the remaining affected habitat, the project's urban-edge context, and the confirmed avoidance of Limestone, a moderated provisional terrestrial offset ratio of **5:1** is considered a reasonable and defensible working position for comment and discussion.

This ratio should be understood as a professional, case-specific and precautionary position adopted for current offset-planning purposes. It is not presented as a fixed rule prescribed by either the national or provincial guideline and remains subject to confirmation through engagement with the relevant authorities, final habitat accounting and the subsequent offset assessment process. The proposed 5:1 ratio, together with the alternative ratios discussed above, will be examined and assessed in greater detail in the sections that follow, with consideration given to the condition, conservation importance, connectivity and spatial context of the affected habitat units.

7. Indicative Offset Area Calculations

Based on the current proposed development footprint, approximately 71.64 ha of Endangered (EN) habitat is expected to be lost. The affected habitat units and their respective areas are presented in *Table 2*.

Table 2 Summary of Impacted Vegetation Habitat Units and Area Affected by the Proposed Development.

Impacted terrestrial unit	**Hectares**
Ecotone / Transition Zone (treated as Langebaan Dune Strandveld habitat)	9.86
Strandveld Thicket (treated as Langebaan Dune Strandveld habitat)	47.80
Valley Bottom Strandveld (treated as Saldanha Flats Strandveld)	13.98
Total impacted terrestrial habitat	**71.64**

The mapped 71.65 ha CBA 1 overlap is currently interpreted as a spatial biodiversity-planning overlay that broadly corresponds with the assessed habitat-impact footprint. It has therefore not been added separately to the total habitat loss, thereby avoiding double-counting.

For transparency, alternative ratio scenarios are set out below to support competent authority comment on the most appropriate ratio framework. These scenarios are presented on the basis that all confirmed limestone habitat has been avoided.

7.1 Based on the National Biodiveristy Offset Policy (DEA, 2023)

If the CBA 1 area were treated strictly at 30:1:

71.65 ha × 30 = 2,149.50 ha

Indicative gross offset requirement: 2,149.50 ha

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This provides a useful starting point; however, applying it uncritically in this case would be overly conservative, particularly given the confirmed avoidance of Limestone habitat and the project's recognised urban-edge context

7.2 Western Cape Guideline on Biodiveristy Offsets (DEA&DP, 2015)

If all impacted habitat is treated under the Western Cape Guideline on Biodiveristy Offsets recognised urban-edge logic for Endangered ecosystems at 1:1 ratio:

71.64 ha × 1 = 71.64 ha

Indicative gross offset requirement: 71.64 ha

This represents the lowest offset scenario, based on the application of the minimum broadly applicable ratio across the affected habitat units, without differentiation according to habitat-specific conservation importance or ecological condition.

7.3 The Saldanha Strategic Offset Strategy (SSOS) 2020

Using the habitat-specific approach set out in this letter, and informed by the Saldanha Strategic Offset Strategy, a 1:1 offset ratio is applied to Langebaan Dune Strandveld, while a 1:10 offset ratio is applied to Saldanha Flats Strandveld:

- Ecotone / Transition Zone (Langebaan Dune Strandveld) = 9.86 ha × 1 = 9.86 ha;
- Strandveld Thicket (Langebaan Dune Strandveld) = 47.80 ha × 1 = 47.80 ha; and
- Valley Bottom Strandveld (Saldanha Flats Strandveld) = 13.98 ha × 10 = 139.80 ha

Total: 9.86 + 47.80 + 139.80 = 197.46 ha

Indicative gross offset requirement: 197.46 ha

This represents a locally contextualised, habitat-specific assessment scenario, informed by the conservation importance and offset requirements assigned to the relevant vegetation types.

7.4 Specialist-Recommended Moderated Provisional Project Offset Ratio

Applying a single moderated 5:1 ratio to the total impacted terrestrial habitat:

71.64 ha × 5 = 358.20 ha

Indicative gross offset requirement: 358.20 ha

This represents the specialist-recommended provisional project-wide offset requirement for current planning and discussion purposes, subject to refinement as the habitat accounting and authority engagement progress. Based on the information currently available, it should be regarded as a conservative working scenario, despite the confirmed avoidance of the Limestone habitat.

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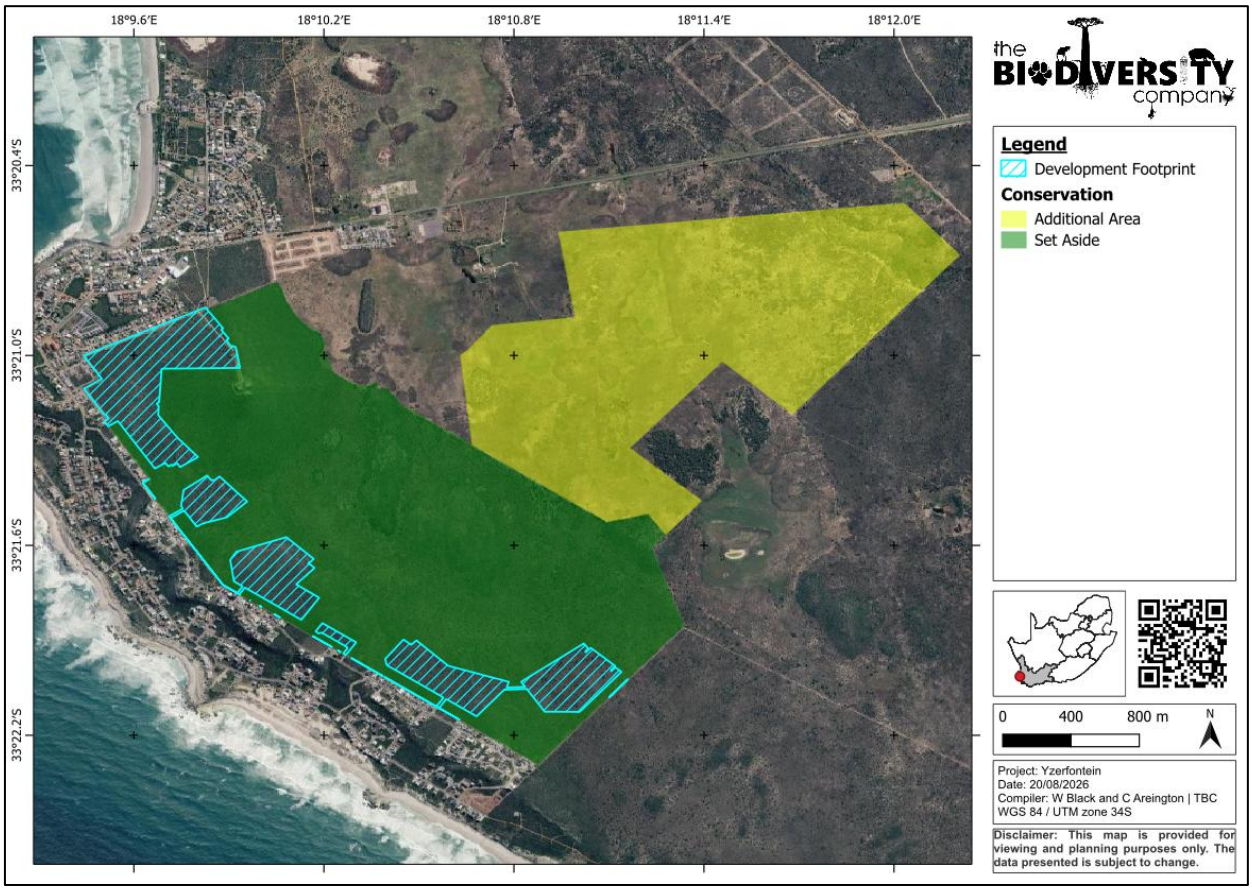

Figure 7 Yzerfontein Purposed Development and Suggestion Set-Aside Area.

The applicant has proposed a 324 ha set-aside area (*Figure 7*), although smaller than the preliminary offset requirement of 358 ha, presents a potentially suitable, like for like and better conservation opportunity because it borders and is functionally connected to the existing Yzerfontein Nature Reserve. It is acknowledged that the designation of land as a set-aside does not constitute a biodiversity offset; formal offset recognition would remain subject to confirmation by the relevant authorities and compliance with applicable offset requirements. Nevertheless, the proposed area provides a relatively like-for-like conservation opportunity, subject to verification of the receiving site's habitat extent, ecological condition, conservation value and long-term persistence. Based on Dr Areington's site visit on 4 August 2026, the ecological corridors within the urban setting appear to retain functional connectivity and provide linkages between natural habitat areas. The adjacent set-aside to the existing reserve could therefore strengthen corridor continuity, reduce habitat fragmentation and improve the conservation value of the broader landscape. With appropriate formal protection, ecological objectives, and an adequately funded maintenance and management plan, the area could provide a credible and mutually beneficial outcome that supports both sustainable development and the long-term conservation of the remaining natural system.

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8. Scenario Comparison Table

The table below (***Table 3***) presents a comparative assessment of the indicative terrestrial offset requirements derived from the applicable national, provincial offset frameworks, and the specialist-recommended provisional project ratio, alongside the currently available conservation opportunity.

Table 3 Comparative Terrestrial Offset Scenarios and Current Conservation Opportunity

Offset Guideline	Scenario	Basis of calculation	Indicative offset area required
National Biodiveristy Offset Policy (DEA, 2023)	Strict national CBA 1 as a starting point	71.65 ha × 30	2,149.50 ha
Western Cape Guideline on Biodiveristy Offsets (DEA&DP, 2015)	Western Cape urban-edge logic	71.64 ha × 1	71.64 ha
The Saldanha Strategic Offset Strategy (SSOS) 2020	SSOS-type differentiated logic	9.86 × 1 + 47.80 × 1 + 13.98 × 10	197.46 ha
Specialist-Recommended Moderated Provisional Project Offset Ratio	Recommended provisional project position	71.64 ha × 5	358.20 ha
	Current Opportunity	=324/71.64= 1:4.5	324 ha

Additional land may be available for potential inclusion in the conservation set-aside; however, this area would require extensive ecological rehabilitation and cannot currently be regarded as a like-for-like offset. It could therefore be considered as a supplementary option if the proposed 1:4.5 offset opportunity is not regarded as sufficient, subject to the development of a rehabilitation plan, confirmation of the target ecological condition and agreement on appropriate implementation, monitoring and long-term management requirements.

9. Requested Comment and Working Conclusion

If a single working number is to be carried forward at this stage for purposes of early discussion, an indicative gross terrestrial offset requirement of approximately 358.2 ha, based on a provisional 5:1 project ratio applied to the 71.64 ha impacted terrestrial habitat footprint, is considered the most balanced current position.

In our view, this represents a reasonable middle-ground because it recognises the good ecological condition and CBA-linked sensitivity of the affected habitat, avoids rigid application of the national punitive 30:1 CBA approach, acknowledges the urban-edge context which supports a reduced ratio approach, remains more precautionary than a blanket 1:1 outcome, and is easier to defend than either of the extreme positions. It also reflects the material fact that all confirmed limestone habitat has been avoided and that the residual offset question therefore relates only to the remaining impacted non-limestone habitat units.

Notwithstanding the above, this ratio is submitted to the competent authority for comment at this stage. We would specifically welcome comment on:

- the appropriateness of the proposed 5:1 working ratio as an interim project position;
- the extent to which the recognised urban-edge context may appropriately inform ratio reduction in this case;
- the weight to be attached to the CBA 1 overlap in the ratio determination, given that limestone habitat has been avoided;

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- the extent to which the SSOS (2020) should/could inform the final offset approach; and
- any preferred requirements for the format, scope and level of detail of the subsequent formal offset assessment.

This letter should accordingly be read as a request for competent authority input on the appropriate terrestrial biodiversity offset direction prior to finalisation of the offset report.

10. Important Qualifications

The indicative offset requirement presented above is a gross, provisional estimate and remains subject to refinement following confirmation of the following matters:

- Confirmation of the basis, spatial accuracy and defensibility of the CBA 1 classification within the affected area;
- Agreement with the relevant authorities on the applicable offset framework, assessment method and ratio;
- Determination of whether existing conservation servitudes, retained conservation areas or the proposed core conservation area can legitimately contribute to the offset outcome, taking into account the principles of additionality, permanence and appropriate accounting; and
- Confirmation that any proposed offset-receiving areas are suitable in terms of their habitat representation, ecological condition, connectivity, legal security, long-term protection and capacity for effective management.

11. Recommendation

For current planning purposes, the currently identified 324 ha conservation opportunity, which may provide a potentially suitable receiving area, is a great opportunity, subject to confirmation of its legal security, management requirements and formal offset eligibility. The proposed ratio and offset approach should be refined through further engagement with the competent authority and relevant commenting bodies, whose comments will be important in determining the final offset requirement and the acceptability of the proposed conservation opportunity.

12. Conclusion

In our opinion, the combined botanical and terrestrial biodiversity information base is sufficient to support a provisional terrestrial biodiversity offset position for the proposed Yzerfontein mixed-use development.

The available evidence confirms that the site contains high-value and, in places, largely pristine terrestrial habitat, including limestone-associated habitat of particular conservation significance, together with multiple threatened vegetation ecosystems, SCC, and important corridor functions. The current layout information further confirms that all mapped and confirmed limestone habitat has been avoided. This materially reduces the severity of the residual terrestrial impact profile and is an important consideration in the authority's review of the appropriate ratio outcome.

Based on the information currently available, a terrestrial biodiversity offset is likely to remain warranted for the residual impacts to non-limestone habitat, subject to final verification of the development footprint, reconciliation of the impacted habitat accounting and agreement on the applicable offset framework and ratio. This letter is therefore respectfully submitted to the competent authority and relevant commenting

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bodies for consideration and comment on the proposed offset approach and the working ratio scenarios presented above.

Kind regards,



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