



# Eco Route

ENVIRONMENTAL CONSULTANCY  
REGISTRATION NO. 1998/031976/23

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## DRAFT BASIC ASSESSMENT REPORT

FOR

PROPOSED DEVELOPMENT OF ERF 1058, WHITES ROAD,  
HOEKWIL (WILDERNESS HEIGHTS), GEORGE MUNICIPALITY,  
WESTERN CAPE.

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



**PREPARED FOR:** MR A POLSON  
**PREPARED BY:** ECO ROUTE ENVIRONMENTAL CONSULTANCY  
**DEPARTMENT REF:** 16/3/3/1/D2/30/0015/24  
**AUTHOR:** JOCLYN MARSHALL (EAPASA REG 2022/5006)  
**DATE:** 16/05/2024

# ECO-ROUTE

## ENVIRONMENTAL

## CONSULTANCY



REGISTRATION NO. 1998/031976/23

### CONDITIONS OF USE OF THE REPORT

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5. This document is prepared exclusively for **Mr Alexander G. Polson** (Wealth Spring (Pty) Ltd) and is subject to all confidentiality, copyright and trade secrets, rules, intellectual property law and practices of South Africa.

### STATEMENT OF INDEPENDENCE

I, **Joclyn Marshall**, of Eco Route Environmental Consultancy, in terms of section 33 of the NEMA, 1998 (Act No. 107 of 1998), as amended, hereby declare that I provide services as an independent Environmental Assessment Practitioner (EAPASA Reg: **2022/5006**) and receive remuneration for services rendered for undertaking tasks required in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), and the Environmental Impact Assessment Regulations, 2014 (as amended). I have no financial or other vested interest in the project.

EAP SIGNATURE: \_\_\_\_\_



**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.

**APRIL 2024**

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

### GENERAL PROJECT DESCRIPTION

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

**PROPOSED DEVELOPMENT OF ERF 1058, WHITES ROAD, HOEKWIL (WILDERNESS HEIGHTS) GEORGE MUNICIPALITY & DIVISION, WESTERN CAPE.**

Erf 1058 Hoekwil is a vacant smallholding of 3.0108ha in extent, located in Hoekwil (Wilderness Heights). The zoning of the property is Agriculture Zone II in terms of the George Integrated Zoning Scheme By-law (2017). The property overlooks the Touw River and Ebb & Flow Rest Camp (Garden Route National Park) to the east, the Fairy Knowe-area and the Indian Ocean to the south, and the Village of Wilderness to the west. Access to the property is from Whites Road leading from the Village around the Wilderness Heights area with a circular route from the west to east and again reaching Heights Road in the west. The section of Whites Road passing Erf 1058 Hoekwil is a provincial road, Divisional Road 1621.

The proposed development will consist of 730m<sup>2</sup> of building structures (houses, accommodation units, etc), and 1051m<sup>2</sup> of landscaped areas (roads, parking, pool, deck areas, etc). The following is proposed on Erf 1058:

- Main residential dwelling for the property owner (280m<sup>2</sup>).
- Outbuilding with homer office, garage, and storage space (170m<sup>2</sup>).
- Kitchen Yards(35m<sup>2</sup>).
- Driveway and parking for main dwelling (291m<sup>2</sup>).
- Three tourist accommodation units of 80m<sup>2</sup> each (240m<sup>2</sup>).
- Three jacuzzi decks for tourist accommodation units of 16m<sup>2</sup> each (48m<sup>2</sup>).



- Sauna House (40m<sup>2</sup>).
- Natural outdoor pool (240m<sup>2</sup>).
- Access to tourist accommodation and facilities (270m<sup>2</sup>).
- Parking for tourist accommodation and facilities (72m<sup>2</sup>).
- Footpaths (95m<sup>2</sup>).



### Erf 1058 Locality

- Legend
- Farm Portions
  - Erf

Map Center: Lon: 22°35'54.1"E  
Lat: 33°59'32.8"S

Scale: 1:18 056

Date created: September 19, 2022



**Figure 1: Location of Erf 1058 Hoekwil in Wilderness Heights.**

## 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

<b>CAPE TOWN OFFICE:</b> <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.                      For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map.                      The map must indicate the following:</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> <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:	<b>Maps</b>		
	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	✓
	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;	✓
Appendix C:	Photographs		✓
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	✓
	Appendix E4:	Comment from the DEA: Oceans and Coast	X
	Appendix E5:	Comment from the DAFF	✓
	Appendix E6:	Comment from WCG: Transport and Public Works	✓
	Appendix E7:	Comment from WCG: DoA	✓
	Appendix E8:	Comment from WCG: DHS	X
	Appendix E9:	Comment from WCG: DoH	✓

	Appendix E10:	Comment from DEA&DP: Pollution Management	X
	Appendix E11:	Comment from DEA&DP: Waste Management	X
	Appendix E12:	Comment from DEA&DP: Biodiversity	X
	Appendix E13:	Comment from DEA&DP: Air Quality	X
	Appendix E14:	Comment from DEA&DP: Coastal Management	✓
	Appendix E15:	Comment from the local authority	X
	Appendix E16:	Confirmation of all services (water, electricity, sewage, solid waste management)	✓
	Appendix E17:	Comment from the District Municipality	✓
	Appendix E18:	Copy of an exemption notice	X
	Appendix E19	Pre-approval for the reclamation of land	X
	Appendix E20:	Proof of agreement/TOR of the specialist studies conducted.	X
	Appendix E21:	Proof of land use rights	X
	Appendix E22:	Proof of public participation agreement for linear activities	X
Appendix F:	Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.		✓
Appendix G:	Specialist Report(s)		✓
Appendix H:	EMPr		✓
Appendix I:	Screening tool report		✓
Appendix J:	The impact and risk assessment for each alternative		✓
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:	Alien Clearing Plan		✓

## SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE: REGION 1		GEORGE OFFICE: BEGION 3
	(City of Cape Town, West Coast District)	(Cape Winelands District & Overberg District)	(Central Karoo District & Garden Route District)
Name of Applicant/Proponent:	Mr Alexander G. Polson		
Name of contact person for Applicant/Proponent (if other):			
Company/ Trading name/State Department/Organ of State:	Wealth Spring (Pty) Ltd		
Company Registration Number:	2022/322154/07		
Postal address:	Erf 1058 Wilderness (PO Box 1252, Sedgefield 6573)		
		Postal code: 6560	
Telephone:	( )	Cell: +27(0) 82 481 9434	
E-mail:	alexander@polsons.info	Fax: ( )	
Company of EAP:	Eco Route Environmental Consultancy		
EAP name:	Joclyn Marshall		
Postal address:	2022/5006		
	PO Box 1252, Sedgefield	Postal code: 6573	
Telephone:	( )	Cell: +27(0) 72 126 6393	
E-mail:	joclyn@ecoroute.co.za	Fax: ( )	
Qualifications:	MSc Environmental Science		
EAP registration no:	2022/5006		
Name of landowner:	Wealth Spring (Pty) Ltd		
Name of contact person for landowner (if other):	Mr Alexander G. Polson (Director and Shareholder)		
Postal address:	Erf 1058 Wilderness		
	(PO Box 1252, Sedgefield 6573)	Postal code: 6560	
Telephone:	( )	Cell: +27(0) 82 481 9434	
E-mail:	alexander@polsons.info	Fax: ( )	
Name of Person in control of the land:	Same as above (Mr Alexander G. Polson)		
Name of contact person for person in control of the land:			
Postal address:			
		Postal code:	
Telephone:	( )	Cell:	
E-mail:		Fax: ( )	
Municipality in whose area of jurisdiction the proposed activity will fall:	George Municipality		
Contact person:	Lauren Josias		
Postal address:	PO Box 19, George		
	George Municipality	Postal code: 6530	
Telephone	+27(0) 44 801 9451	Cell:	
E-mail:	ljosias@george.gov.za	Fax: ( )	



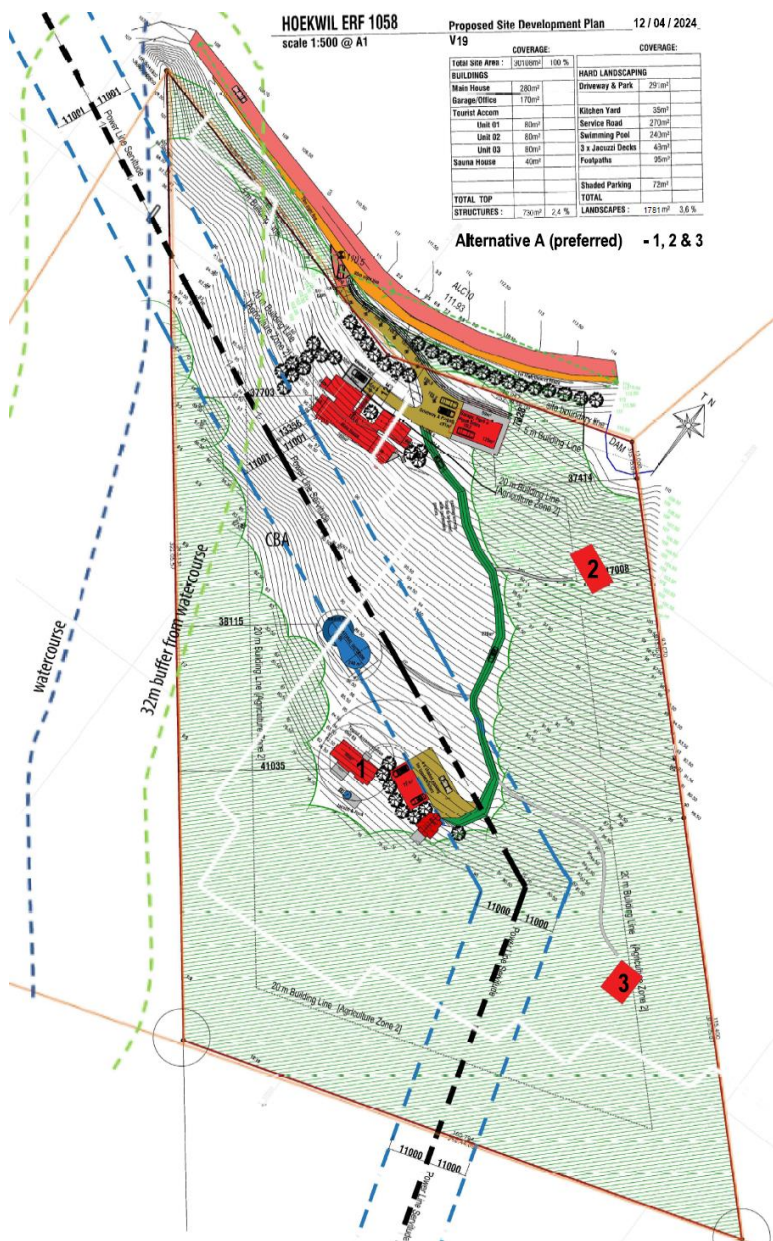
## SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS AS INCLUDED IN THE APPLICATION FORM

1.	Is the proposed development (please tick):	New	✓	Expansion	
2.	Is the proposed site(s) a brownfield or greenfield site? Please explain.				
Greenfield – property is vacant and undeveloped. Zoned as Agriculture.					
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.	SG 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):				30 108 m <sup>2</sup>
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):				0 m <sup>2</sup>
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:				1781 m <sup>2</sup>
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).				
<p>A low density residential and tourism development is proposed on Erf 1058. The property owner's home is proposed to be located on the northwestern side of the property closer to Whites Road. Abutting this primary dwelling an outbuilding with home office above is proposed which will also provide garaging and storage space. Following an existing route on the property, access is to be provided centrally for the vehicles of visitors to the proposed three tourist accommodation units which will each consist of 2 bedrooms. Each tourist accommodation unit will have a small deck with a jacuzzi. The aim is to position the tourist accommodation units with their facilities to be hidden from each other between the vegetation. On the western side of the property in a natural clearing, a natural pool is proposed to be developed. This pool will have a double purpose as a retention pond for stormwater runoff in accordance with the recommendation contained in the 'Aquatic Compliance Statement'. An important aim of the draft Site Development Plan (SDP) is to use existing disturbed spaces and natural open areas on the property for construction to minimise disturbance of thicket vegetation.</p>					

**Alternative A Layout (preferred):**

The proposed development will consist of 730m<sup>2</sup> of building structures (houses, accommodation units, etc), and 1051m<sup>2</sup> of landscaped areas (roads, parking, pool, deck areas, etc). The following is proposed on Erf 1058:

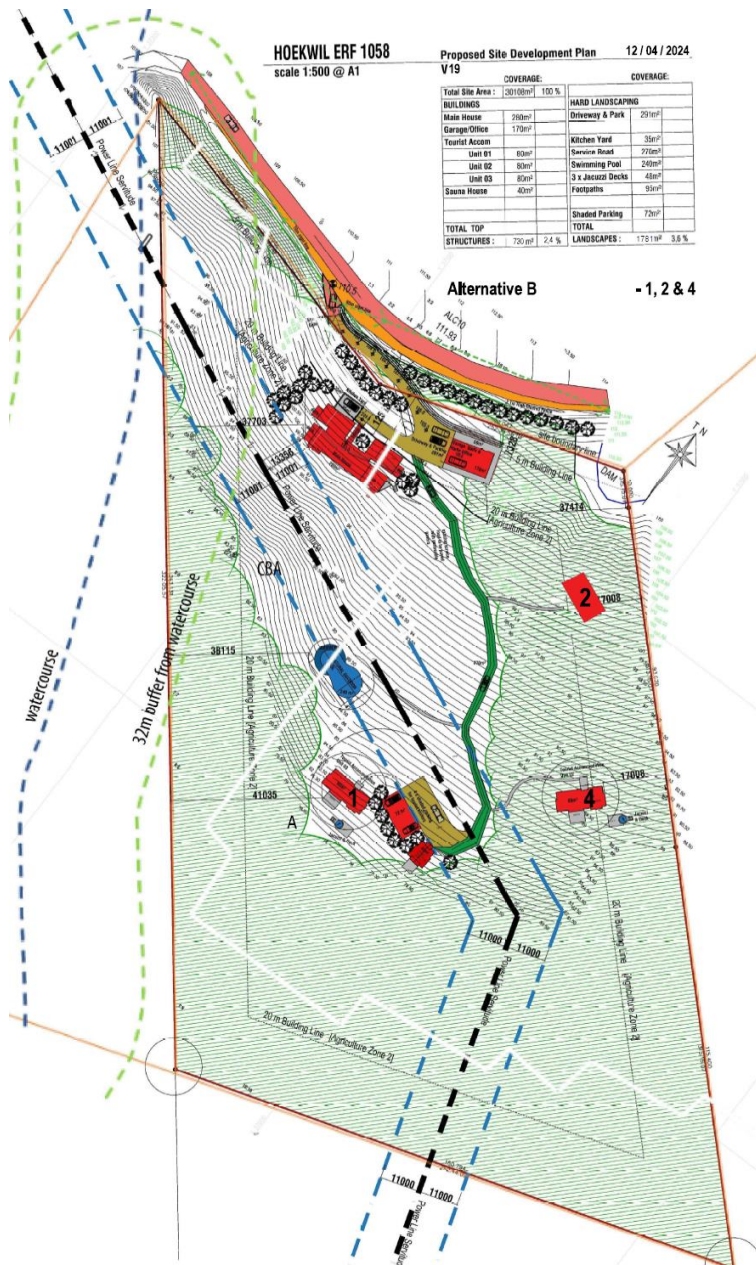
- Main residential dwelling for the property owner (280m<sup>2</sup>).
- Outbuilding with homer office, garage, and storage space (170m<sup>2</sup>).
- Kitchen Yards(35m<sup>2</sup>).
- Driveway and parking for main dwelling (291m<sup>2</sup>).
- Three tourist accommodation units of 80m<sup>2</sup> each (240m<sup>2</sup>).
- Three jacuzzi decks for tourist accommodation units of 16m<sup>2</sup> each (48m<sup>2</sup>).
- Sauna House (40m<sup>2</sup>).
- Natural outdoor pool (240m<sup>2</sup>).
- Access to tourist accommodation and facilities (270m<sup>2</sup>).
- Parking for tourist accommodation and facilities (72m<sup>2</sup>).
- Footpaths (95m<sup>2</sup>).



**Figure 2: Proposed draft Site Development Plan (Alternative A – preferred).**

### Alternative B Layout:

The Alternative B layout maintains the same position and footprint for infrastructure as in the preferred layout, however one of the tourist accommodations (unit 4) is positioned closer to the primary dwelling at Whites Road, as shown in figure 3 below.



**Figure 3: Proposed draft Site Development Plan (Alternative B).**

### Planning Approvals:

It is necessary to rezone Erf 1058 from Agriculture Zone II to Open Space Zone III. The primary land use right of this proposed zoning is nature conservation area with tourist accommodation as a consent use. The rezoning and land use application will be undertaken by Marelize de Bruyn Planning, and comprises the following:

- ❖ Removal in terms of Section 15(2)(f) of the George Municipality: Land Use Planning By-law (2023) of restrictive title conditions E(a) & (b) in T4887/2023.
- ❖ Rezoning in terms of Section 15(2)(b) of the George Municipality: Land Use Planning By-law (2023) from Agricultural Zone II (smallholding) to Open Space Zone III (nature conservation area).



- ❖ Consent use in terms of Section 15(2)(o) of the George Municipality: Land Use Planning By-law (2023) for tourist accommodation.



**Figure 4: Preliminary 3D-image shows how the development proposal is expected to blend into the natural environment (Planning Statement, Marlize de Bruyn Planning, July 2023).**

#### **SERVICES:**

*This section is taken from the Engineering and Services Report (2024) attached as Appendix G7.*

#### **Water:**

Rainwater will be harvested from all roofs and stored in multiple 10,000 Liter or 5,000 Liter tanks. This water will be supplemented as needed from a new 25 mm connection to the George municipal water network (Appendix E16).

The total water consumption for all the buildings (main dwelling, studio office, accommodation) per month is 51351.4 litres. This is calculated to 1711.7 litres per day.

Rainwater will be harvested from all roofs. Assuming an average rainfall of 85 mm per month, the calculation as per the Engineering and Services Report shows that sufficient water can be collected to service all consumption without using any of the municipal water supply. It is planned to provision about 120,000 Liter of storage to collect any excess rain during the rainy season.

#### **Fire suppression:**

Due to the predominantly indigenous vegetation, agricultural metal pipes and sprinklers will be used to provide an additional fire suppression by means of a total of 20 sprinklers placed strategically at the various buildings. Assuming one Liter/s consumption per sprinkler, the total consumption would be 72,000 Liter for one hour only. This will be supplied from the 120,000 Liter of stored water.

The Applicant has been a member of the Southern Cape Fire Protection Association (SCFPA) since 10 January 2023, and is well informed on the topic of being fire wise.

Buildings and infrastructure will be protected by means of:

- Applying the building industry code for fire
- SCFPA recommended:
  - zoning of areas around the buildings; and
  - use of fire hardy or -retardant indigenous plants; and
  - fire-wise practices of keeping available fuel to a minimum.
- Fire suppression with bronze agricultural sprinklers that are:



- o placed strategically around buildings; and
- o gravitation- or delivery pump-fed from water reservoirs

In consultation with the SCFPA, it was established that the planned access road to the lower part of the property, as well as the power line servitude will aid in granting access to firefighting personnel.

**Electricity:**

No connection to the grid will be made. The whole property will be electrically self-sufficient. Electricity will be provisioned by means of roof mounted photo voltaic (PV) panels mounted on the main house and studio building, together with the centrally placed and requisite inverters and storage batteries. Electricity will be provisioned to the various buildings by underground armoured cable. The routes for burying the cables will be as far as possible coincidental with the service road to the lower part of the property.

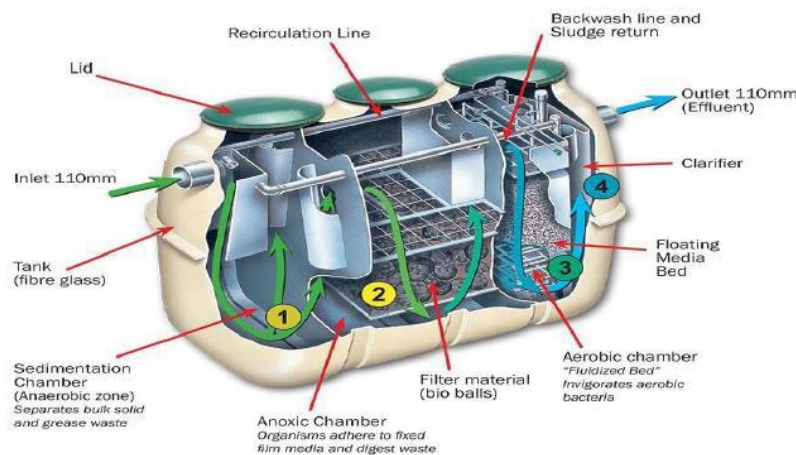
In case of extended overcast weather, a suitably sized generator will be installed at the Studio building to provide for the basic power requirements.

There are various technological aspects which may be implemented as a matter of course in order to assist with overall energy saving:

- Solar geysers and geyser thermal insulation.
- Use of gas for heating and cooking requirements.
- Energy efficient light bulbs.
- Natural ventilation in the buildings / structures.

**Sewer:**

There is no available infrastructure to connect to the municipal system. A Fusion® wastewater treatment plant from Maskam Water, a company based in Cape Town, with a proven track record, will be used, or if not available a similar product. They have a large portfolio of successful installations and operations in ecological sensitive areas, and complies with City of Cape Town Water Amendment By-law, 2018.



The largest unit handles 28 persons per day and is a good fit. Two smaller units are also available, which caters for 6 and 12 persons. The units are modular, which means that additional capacity can easily be added. This also gives the owner the option to spread out capital investment in a phased approach by starting out with smaller units, to which capacity can be added. Water consumption is calculated to be 1711 liters per day, which is expected to be treated.

It is also unlikely to always have 100% occupancy. Tourism average occupation is about 30%, which may cause the dilemma that if over-provisioned, there might not be sufficient effluent to nourish the microbial biome.

Treated discharge is to comply with the Department of Water and Sanitation's General Limit Standards in terms of Section 9 of the National Water Act No. 36 of 1998, which allows it to be released back into the environment. The Plant comes standard with a friction chlorinator for final disinfection of the treated effluent. An optional chemical free UV sterilizer is available for final disinfection.

The package plant gives a timeous alarm whenever it needs attention or maintenance, and therefore it is expected that the effluent will consistently be of a high quality and that it can be safely diverted into a soak away system. The units use between 60 Watt and 120 Watt, which will be supplied of the solar PV system for the property.

Effluent will be diverted to a soakaway system after being treated to standard. Another possible option is to disperse effluent into natural areas, provided this does not trigger a waste use in terms of the National Water Act. It is not proposed to collect and store effluent.

Section 3.12 of the Revision of General Authorisation in terms of Section 39 of the National Water Act, 1998(Act No.36 of 1998) states that it is only necessary to register the water use if more than 50m<sup>3</sup> of wastewater is disposed of on any given day. A General Authorisation or a WULA is therefore not applicable in this case.

The final positioning and selection of capacity is still being determined, due to the distributed housing and steep gradient. This will be finalised by the time that building plans are submitted.

#### **Stormwater management:**

The total area impacted by the proposed development is approximately 6.4 % (1,913 m<sup>2</sup>) of an otherwise vacant natural area (30,108 m<sup>2</sup>). The provision for storm water mitigation is therefore aimed at mitigating the impact of the proposed development which is distributed over an otherwise natural area.

The approach to stormwater management is informed by "*considering stormwater as part of the urban water cycle, a strategy which is being increasingly known as Water Sensitive Urban Design (WSUD) with the stormwater management component being known as Sustainable Drainage Systems (SuDS)*"<sup>1</sup>.

The negative impact of rainwater will be mitigated by:

- reducing its volume through harvesting and using permeable surfaces to absorb remaining water;
- dissipating energy by spreading out over a large area and reducing velocity by hydraulic coarse surfaces.

Rainwater will be harvested from all roofs after diverting first flush to improve quality of water. The remaining water will be further reduced by encouraging absorption using permeable surfaces, such as gravel pavements, and permeable paving blocks.

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<sup>1</sup> Report to the Water Research Commission, "*Alternative Technology for Stormwater Management, The South African Guidelines for Sustainable Drainage Systems*", by Neil Armitage et al, 2013. Download link: <https://www.wrc.org.za/wp-content/uploads/mdocs/TT%20558.pdf>

The access road is made of permeable block paving, the parking areas from coarse gravel. The service road is made from two tracks of permeable paving blocks with coarse gravel in the middle and sides to break the speed of the water and to allow for absorption. The sides of these tracks and run-off from any other surfaces have shallow swales lined with coarse gravel and diversion channels to redirect water at regular intervals away from the road into the surrounding area.

Excess water will be directed to a pond to absorb any excess initial runoff. The slope of embankments and cut-outs will be stabilised by suitable concrete retainer wall blocks.

**Household Waste Removal:**

Waste diversion will be introduced through recycling compostable organic kitchen waste and by separating out recyclable materials.

The total quantity of waste removal is estimated, based on information obtained from the *George Local Municipality Integrated Waste Management Plan*<sup>2</sup> as follow:

- The total waste per person per day (kg/p/d) based on the assumption of a high-income category due to tourism is 1.29 kg/p/d.
- A more conservative value of 2 kg/p/d is used, which is also in line with the Western Cape average.
- An average tourism occupancy rate of 30 % for the "Other" accommodation category is used, which is slightly higher than monthly values reported in the STATS SA report of 2023.
- Food and garden waste should make up about 25% and 13% of the waste profile. Through use of composting and mulching of the above organic waste at the premises, it is estimated that a conservative reduction of at least 38% can be made to the waste that needs to be collected per person.
- By volume, 38.3% of the waste stream is composed of mainstream recyclables (paper, plastic, cardboard, glass and metal).

This means that the quantity of refuse to be collected is calculated as:

- 45 kg/week of recyclable material (blue bag system) and
- 28 kg/week of non-compostable/recyclable material (black bag system)

A weekly refuse removal service is already available and being billed for at the address of the proposed development.

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

Access will be from Whites Road. Access to the three tourist accommodation units will follow an existing route on the property.

Approval for the road connection onto the property was obtained on 25 May 2023, and is shown in Appendix E6. The owner takes note and undertakes to comply with the conditions listed in the approval document under points 3.1 to 3.5 and will make use of the services of a civil engineer that will be appointed in due course.

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	2	7	0	0	0	5	0	0	0	0	1	0	5	8	0	0	0	0
4.7.	Coordinates of the proposed site(s) for all alternatives:																				
	Latitude (S)									33°			59'			20.00"S					
	Longitude (E)									22°			35'			55.89"E					

<sup>2</sup> George Local Municipality Integrated Waste Management Plan, 2020 – 2025, GE38216, March 2020

## 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.				
NATIONAL LEGISLATION	RELEVANT YES / NO	ADMINISTERING AUTHORITY	TYPE Permit/ license/ authorization/co mment / relevant consideration (e.g. rezoning or consent use, building plan approval)	DATE (if already obtained):
ENVIRONMENTAL CONSERVATION ACT (ACT 73 OF 1989): OUTENIQUA SENSITIVE COASTAL AREA EXTENSION REGULATIONS	YES	George Municipality	PERMIT	Will not be applicable if EA is granted.
NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT 107 OF 1998)	YES	DEA&DP	AUTHORIZATION	Pending
NATIONAL ENVIRONMENTAL MANAGEMENT AMENDMENT ACT (ACT 62 OF 2008)	YES	DEA&DP	AUTHORIZATION	Pending
NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (ACT NO 10 OF 2004)	YES	DEA&DP	RELEVANT CONSIDERATION – Removal of AIS	None
NATIONAL ENVIRONMENTAL MANAGEMENT: INTERGRATED COASTAL MANAGEMENT ACT (ACT NO 24 OF 2008)	YES	DEA&DP	COMMENT/ RELEVANT CONSIDERATION	None
NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE ACT (ACT 59 OF 2008)	NO	DEA&DP	RELEVANT CONSIDERATION	None



NATIONAL VELD AND FOREST FIRE ACT (ACT 101 OF 1998)	YES	DFFE / SCFPA	RELEVANT CONSIDERATION	None
NATIONAL WATER ACT (ACT 36 OF 1998)	YES	Department of Water & Sanitation / BOCMA	COMMENT/ RELEVANT CONSIDERATION	None
WATER SERVICES ACT (ACT 108 OF 1997)	NO	Department of Water & Sanitation	RELEVANT CONSIDERATION	None
SUBDIVISION OF AGRICULTURAL LAND ACT (ACT 70 OF 1970)	No	Department of Agriculture	RELEVANT CONSIDERATION	None
CONSERVATION OF AGRICULTURAL RESOURCES ACT (ACT 43 OF 1983)	YES	Department of Agriculture	COMMENT/ RELEVANT CONSIDERATION	No objection
NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)	YES	Heritage Western Cape	AUTHORIZATION / COMMENT	No objection
NATIONAL HEALTH ACT (ACT 61 OF 2003)	YES	Department of Health and Wellness	COMMENT/ RELEVANT CONSIDERATION	No objection
SPLUMA (ACT 13 OF 2013)	YES	George Municipality	AUTHORIZATION  Rezoning / Consent Use Application / Building Plan Application	Pending
<b>PROVINCIAL LEGISLATION WESTERN CAPE</b>	<b>RELEVANT YES / NO</b>	<b>ADMINISTERING AUTHORITY</b>	<b>TYPE Permit/ license/ authorization/ comment / relevant consideration</b> (e.g. rezoning or consent use, building plan approval)	<b>DATE (if already obtained):</b>
WESTERN CAPE NATURE CONSERVATION LAWS AMENDMENT ACT (ACT 3 OF 2000)	NO	CapeNature	COMMENT	None
WESTERN CAPE NATURE CONSERVATION BOARD ACT (ACT 15 OF 1998)	NO	CapeNature	COMMENT	None
WESTERN CAPE PLANNING AND DEVELOPMENT ACT (ACT 7 OF 1999)	YES	CapeNature	COMMENT	None
MUNICIPAL LAND USE PLANNING BYLAW 2023	YES	George Municipality	AUTHORIZATION  Removal of Conditions / Rezoning / Consent Use	Pending

#### 4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.		
<b>POLICIES</b>	<b>ADMINISTERING AUTHORITY</b>	<b>APPLICABILITY</b>
Western Cape Provincial Spatial Development Framework (PSDF)	DEA&DP	The PSDF sets out the provincial government's spatial vision, objectives, and policies for guiding development.
Western Cape Biodiversity Spatial Plan (WCBSP)	CapeNature	CBA objectives / appropriate land use
George Municipality Spatial Development Framework (GMSDF) (2023).	George Municipality	The proposed development is in line with the George Municipality SDF strategies and policies as discussed in the land use planning report (Appendix G1).
Wilderness – Lakes – Hoekwil Local Spatial Development Framework (WLH LSDF) (2015)	George Municipality	No conflict.
The Garden Route Environmental Management Framework	Garden Route District Municipality	No conflict.

#### 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.

<b>Guidelines</b>	<b>Explain how they have influenced the development proposal:</b>
Circular EADP 0028/2014: One Environmental Management System.	A WULA was determined to not be required. Synchronization in terms of this circular was not required.
Guideline on Need and Desirability (March 2013).	Need & Desirability were determined and discussed as per these regulations and included in Appendix K of the Basic Assessment Report.
Guideline on generic terms of Reference for EAPs and Project Schedules (March 2013)	Project timeline and process was informed by these guidelines. Informs the EAP on important aspects within the process.
Guideline for determining the scope of specialist involvement in EIA processes (June 2005)	These guidelines were considered in the appointment of specialist.
Guideline for review of specialist input in the EIA process (June 2005)	Specialist involvement in the process was informed by these guidelines.
Guideline for involving visual and aesthetic specialists in the EIA process (June 2005)	Paul Buchholz was appointed to provide visual specialist input. The specialist input was sufficient in terms of the guidelines.
Guideline for involving heritage specialists in the EIA process (June 2005)	Dr. Peter Nilssen was appointed to provide heritage specialist input. The specialist input was sufficient in terms of the guidelines.
Guideline for involving social assessment specialists in the EIA process (February 2007)	Social aspects were determined and discussed as per these guidelines and included in Appendix K of the Basic Assessment Report.
Guideline for Environmental Management Plans (June 2005).	An EMPr has been drafted and included with the Basic Assessment Report. The EMPr complies with Appendix 4 of Regulation 982

	of the 2014 EIA Regulations and section 24N of the Act.
Guideline on Alternatives (March 2013).	These guidelines have been used in consideration of feasible and reasonable alternatives.
Guideline for Public Participation (2013)	The PPP has been undertaken in accordance with the guidelines and applicable regulations. Appendix F contains a summary of the PPP undertaken.

**WESTERN CAPE LAND USE PLANNING GUIDELINES: RURAL AREAS, 2019**

Erf 1058 Hoekwil is located in a more rural setting due to its location in Wilderness Heights and proximity to the Garden Route National Park and the Touw River. The property is also located outside of the urban edge. The Western Cape Land Use Planning Guidelines: Rural Areas (2019) applies to Erf 1058 Hoekwil (Wilderness Heights). The objectives of the Rural Areas guideline are:

- ❖ Promote sustainable development in appropriate rural locations throughout the Western Cape and ensure the inclusive growth of the rural economy.
- ❖ Safeguard priority biodiversity areas and the functionality of the province's life supporting ecological infrastructure and ecosystem services (i.e., environmental goods and services).
- ❖ Maintain the integrity, authenticity and accessibility of the Western Cape's significant farming, ecological, coastal, cultural, and scenic rural landscapes, and natural resources.
- ❖ Assist Western Cape municipalities to plan and manage their rural areas more effectively, and to inform the principles of their zoning schemes and spatial development frameworks in a pro-active manner.
- ❖ Provide clarity to all role players and partners (public and private) on the type of development that is appropriate beyond the current built-up areas, suitable locations where it could take place, and the desirable form and scale of such development. The proposal for Erf 1058 Hoekwil is found to be compliant with the abovementioned objectives.

The proposal for Erf 1058 Hoekwil (Wilderness Heights) aims to provide accommodation for the property owner and tourists on a section of the property which is not indicated as a specific SPC. The Rural Areas guideline further states that overnight accommodation can be provided in a CBA-area with temporary structures preferred (e.g., wooden structures, tents, raised boardwalks, and/or tree canopy structures), with units carefully dispersed or clustered (depending on the landscape, habitat and existing infrastructure and access) to achieve least impact. The use of alternative porous materials and innovative eco-friendly design concepts are encouraged. As stated, the accommodation is not to be provided within the demarcated CBA-area which was found to not be CBA by the biodiversity specialist.

As only 3 tourist accommodation units are proposed, the Rural Areas guideline regard it as a small resort where the floor area of a unit can be up to 120m<sup>2</sup>. As indicated in this motivation report, the 3 tourist accommodation units is proposed to be 80m<sup>2</sup> each. The development space on the property is limited as discussed earlier. In conclusion, the development proposal for Erf 1058 Hoekwil (Wilderness Heights) holds no conflict with the Western Cape Land Use Planning Guidelines: Rural Areas (2019).

**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
An Environmental Screening Tool Report was generated, and a Site Sensitivity Verification Report compiled (Appendix I). Specialist assessments were compiled in terms of the minimum report

content requirements for Environmental Impacts with regards to specialist themes. The following protocols were applicable:

- SITE SENSITIVITY VERIFICATION REQUIREMENTS WHERE A SPECIALIST ASSESSMENT IS REQUIRED BUT NO SPECIFIC ASSESSMENT PROTOCOL HAS BEEN PRESCRIBED
- PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON TERRESTRIAL BIODIVERSITY
- PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON AQUATIC BIODIVERSITY
- PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON TERRESTRIAL PLANT SPECIES
- PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON TERRESTRIAL ANIMAL SPECIES

## 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.
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.
4	<p>The development of a road wider than 4 metres with a reserve less than 13,5 metres.</p> <p><b>i. Western Cape</b></p> <ul style="list-style-type: none"> <li>i. Areas zoned for use as public open space or equivalent zoning;</li> <li>ii. <u>Areas outside urban areas;</u> <ul style="list-style-type: none"> <li>(aa) <u>Areas containing indigenous vegetation;</u></li> <li>(bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or</li> </ul> </li> <li>iii. Inside urban areas: <ul style="list-style-type: none"> <li>(aa) Areas zoned for conservation use; or</li> </ul> </li> </ul> <p>Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority.</p>	<p>Driveway and parking for the main dwelling will require a new access road wider than 4 metres off road DR1621, also known as Whites Road.</p>
12	<p>The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in</p>	<p>The proposed development will consist of 730m<sup>2</sup> of building structures (houses, accommodation units, etc), and 1051m<sup>2</sup> of landscaped areas (roads, parking, pool, deck areas, etc).</p>



	<p>accordance with a maintenance management plan.</p> <p><b>i. Western Cape</b></p> <p>i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;</p> <p>ii. Within critical biodiversity areas identified in bioregional plans;</p>	<p>This amounts to the clearance of more than 300 square meters of indigenous vegetation within an endangered ecosystem. The Site is mapped as Garden Route Granite Fynbos (FFg 5) described as having a threat status of Critically Endangered.</p>
<p><b>Note:</b></p> <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

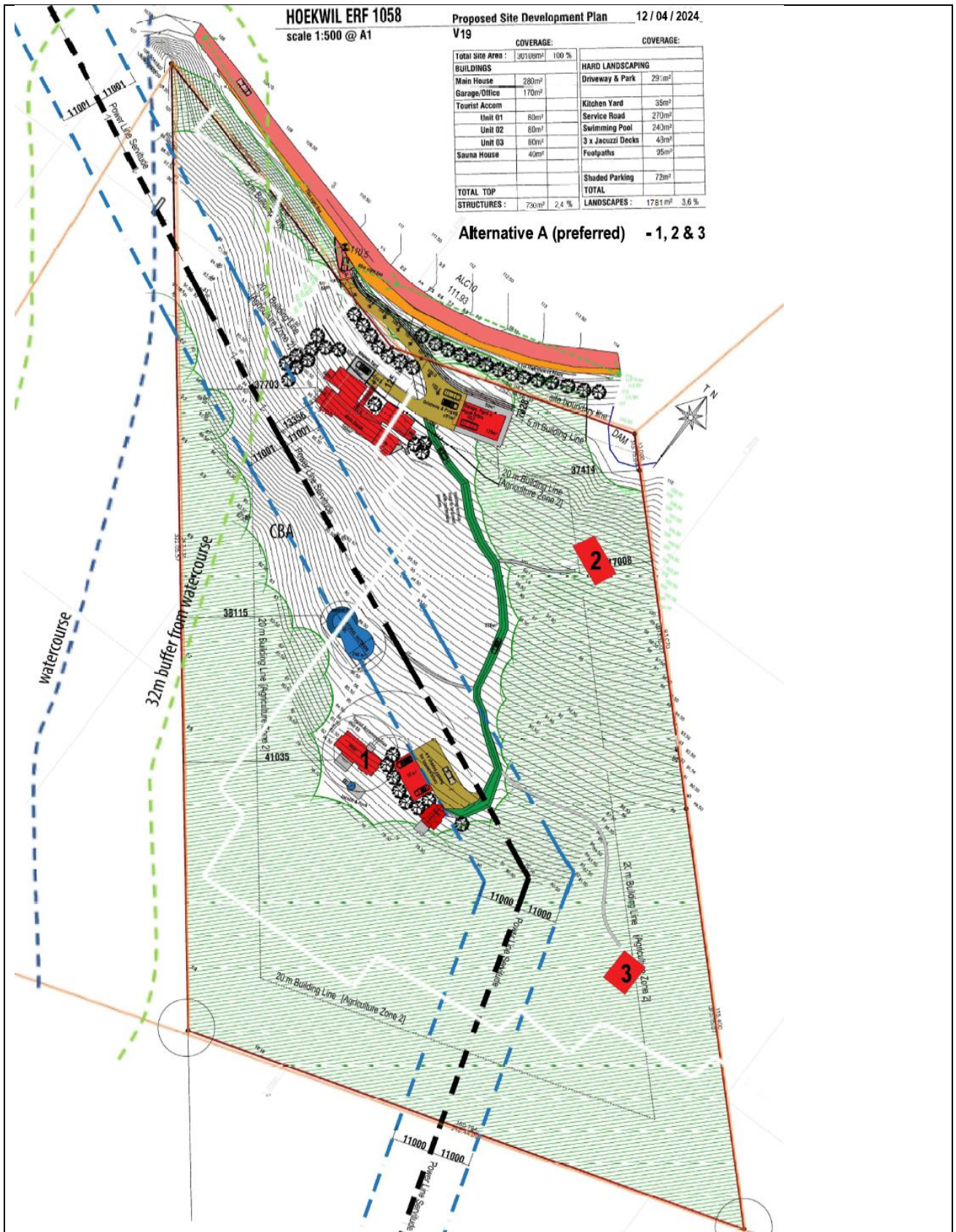
Activity No(s):	Provide the relevant <b>Basic Assessment Activity(ies)</b> as set out in <b>Category A</b>	Describe the portion of the proposed development to which the applicable listed activity relates.

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.

## SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.
<p><b>Alternative A Layout (preferred):</b></p> <p>The proposed development will consist of 730m<sup>2</sup> of building structures (houses, accommodation units, etc), and 1051m<sup>2</sup> of landscaped areas (roads, parking, pool, deck areas, etc). The following is proposed on Erf 1058:</p> <ul style="list-style-type: none"> <li>Main residential dwelling for the property owner (280m<sup>2</sup>).</li> <li>Outbuilding with homer office, garage, and storage space (170m<sup>2</sup>).</li> <li>Kitchen Yards(35m<sup>2</sup>).</li> <li>Driveway and parking for main dwelling (291m<sup>2</sup>).</li> <li>Three tourist accommodation units of 80m<sup>2</sup> each (240m<sup>2</sup>).</li> <li>Three jacuzzi decks for tourist accommodation units of 16m<sup>2</sup> each (48m<sup>2</sup>).</li> <li>Sauna House (40m<sup>2</sup>).</li> <li>Natural outdoor pool (240m<sup>2</sup>).</li> <li>Access to tourist accommodation and facilities (270m<sup>2</sup>).</li> <li>Parking for tourist accommodation and facilities (72m<sup>2</sup>).</li> <li>Footpaths (95m<sup>2</sup>).</li> </ul>	



**Figure 5: Proposed draft Site Development Plan (Alternative A – preferred).**

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.

It is necessary to rezone Erf 1058 from Agriculture Zone II to Open Space Zone III. The primary land use right of this proposed zoning is nature conservation area with tourist accommodation as a

consent use. The rezoning and land use application will be undertaken by *Marlize de Bruyn Planning*, and comprises the following:

- ❖ Removal in terms of Section 15(2)(f) of the George Municipality: Land Use Planning By-law (2023) of restrictive title conditions E(a) & (b) in T4887/2023.
- ❖ Rezoning in terms of Section 15(2)(b) of the George Municipality: Land Use Planning By-law (2023) from Agricultural Zone II (smallholding) to Open Space Zone III (nature conservation area).
- ❖ Consent use in terms of Section 15(2)(o) of the George Municipality: Land Use Planning By-law (2023) for tourist accommodation.

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.

It is necessary to rezone the property from Agriculture Zone II to Open Space Zone III with consent use in terms of Section 15(2)(o) of the George Municipality: Land Use Planning By-law (2023) for tourist accommodation.

- ❖ The primary land use right of this proposed zoning is nature conservation area with the following objective:

The objective of this zone is to provide for the conservation of natural resources in areas that have not been proclaimed as nature areas (non-statutory conservation), in order to sustain flora and fauna and protect areas of undeveloped landscape including woodlands, ridges, wetlands and the coastline. A range of consent uses is provided to supplement and support the main objective of this zone.

- ❖ The land use description for nature conservation area is:

"nature conservation area" means the use and management of land with the objective of preserving the natural biophysical characteristics of that land, such as the fauna and flora and includes: (a) a dwelling house on a property zoned solely Open Space Zone III; but does not include tourist facilities, tourist accommodation or agriculture.

4. Explain how the proposed development will be in line with the following?

4.1 The Provincial Spatial Development Framework.

The sustainable use of provincial assets is one of the main aims of the PSDF. The protection of the non-renewable natural and agricultural resources is achieved through clear settlement edges for towns by defining limits to settlements and through establishing buffers/transitions between urban and rural areas. The urban fringe must ensure that urban expansion is structured and directed away from environmentally sensitive land and farming land; agricultural resources are reserved; environmental resources are protected; appropriate levels of services are feasible to support urban fringe land uses, and land use allocations within the urban fringe are compatible and sustainable. The property is outside of the urban edge and has access to existing service networks.

4.2 The Integrated Development Plan of the local municipality.

The proposed development is in line with the George Municipality SDF strategies and policies as discussed in the land use planning report (Appendix G1). The Municipal SDF is the spatial manifestation of the IDP. Therefore, this development proposal supports the IDP.

4.3. The Spatial Development Framework of the local municipality.

Erf 1058 Hoekwil (Wilderness Heights) is not addressed specifically in the George Municipality Spatial Development Framework (GMSDF) 2023. It is located in Wilderness Heights, a small holding area of the greater Wilderness. The GMSDF refers to the Wilderness – Lakes – Hoekwil Local Spatial Development Framework (WLH LSDF) 2015, in which study area the subject property is located. The function of small holdings as a settlement type is described as low-density rural living, with an agricultural component with reference in the relevant LSDF. Wilderness Heights is one such small holding area.

The GMSDF also describes the area of the Wilderness-Lakes-Hoekwil LSDF as follows:

“Wilderness, Touwsrante, and Hoekwil Wilderness is one of the most popular tourism and residential destinations along the Garden Route, based on its unique terrestrial, aquatic and marine assets, outstanding rural and townscape qualities, and recreational amenity value. Threats to the area include the subdivision of smallholdings, expansion of poorly located and serviced informal areas, and insensitive building development.”

Tourism and recreation are ways to achieve economic growth and adds to the sense of place of the greater George municipal area as the gateway to the Garden Route. The GMSDF states that tourism accommodation and uses in varying formats in the urban and rural environments is a generally accepted principle.

The protection of natural resources is relevant to this proposal for Erf 1058 Hoekwil. The GMSDF states that the use of land in the municipal area must protect natural resources, ecological functioning, ecological services and also the rural character. The rural areas are located outside the urban edge and includes agricultural and natural areas. The rural area contributes to the economy and the sense of place with systematic erosion to be prevented.

The proposal for Erf 1058 Hoekwil aims to acknowledge the natural potential of the property while making it accessible to visitors and tourists. The new owner is already improving the property by controlling the alien vegetation found here.

The GMSDF states that Open Space Zone III is encouraged in CBA/ESA areas and where steep slopes are found. Erf 1058 Hoekwil is also located abutting the Wilderness Lakes Protected Area of the Garden Route National Park. A property also bordering onto Erf 1058 Hoekwil was recently rezoned to Open Space Zone III. Properties surrounding the Garden Route National Park are slowly reflecting the character of the area and the importance of its location. Through appropriate management the natural environment of this property is being restored.

As Erf 1058 Hoekwil is not located on a ridge, the development can be 'hidden' in the surrounding natural vegetation. Visual impact is mitigated due to its location, building style and exterior finishes that will blend in the area. Sections of the property are steeper than 1:4 but primarily avoided.

No conflict was found between the GMSDF and the proposed development of this property as proposed. Therefore, this application is consistent with the GMSDF as required in terms of Section 19 of the Land Use Planning Act, 2014 (LUPA).

4.4.	The Environmental Management Framework applicable to the area.
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The EMF has been identified as the tool that can be used to alert developers and authorities to the key environmental attributes of an area that need to be considered in the planning and development process. The Garden Route Environmental Management Framework is applicable in this case.

The property can be described as disturbed urban land situated in an area that has been identified in an approved Spatial Development Framework for residential purposes. The property does not have a protected status or falls within a conservation area. There are no proclaimed heritage sites or scenic routes on the properties. The site is of no cultural or religious significance.

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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Aquatic Compliance Statement: Erf 1058, Wilderness, Western Cape. Dr. James M. Dabrowski of Confluent Environmental, June 2023: A buffer for the non-perennial drainage line to the west of the property is set to 36 m. Any development that occurs within the buffer would be considered to be of a Very High aquatic sensitivity, while areas outside of the buffer are considered to be of a Low



sensitivity. The development footprint (all structures and hard landscaping) falls entirely within the Low sensitivity area.

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

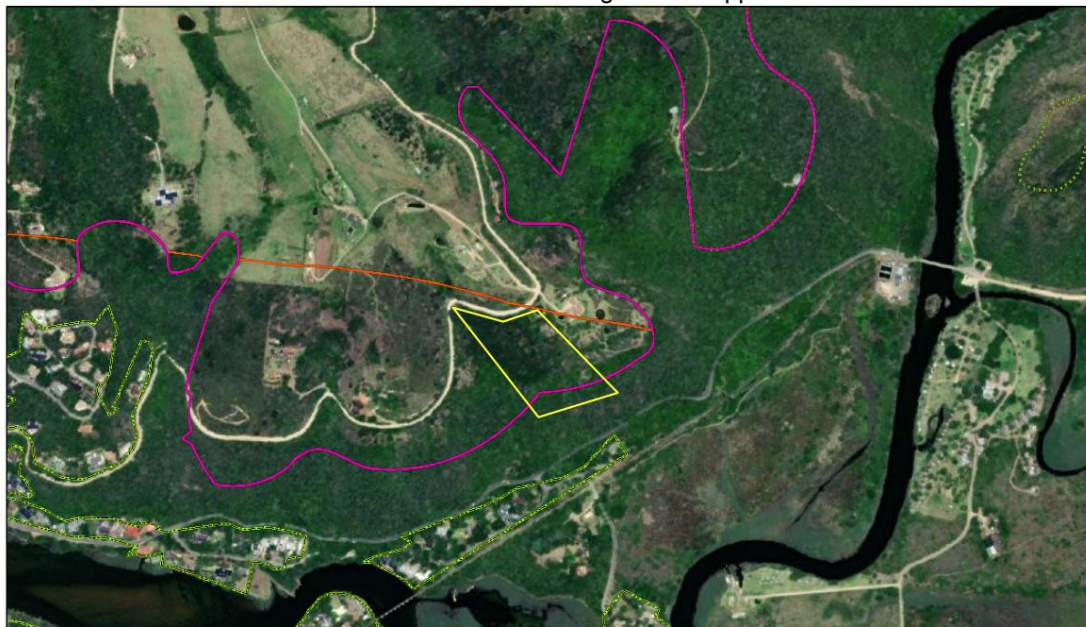
The Western Cape Biodiversity Spatial Plan (WCBSP) was developed by Cape Nature, in collaboration with the Department of Environmental Affairs and Development Planning as a spatial tool that comprises the Biodiversity Spatial Plan Map (BSP Map) of biodiversity priority areas, accompanied by contextual information and land-use guidelines. The Biodiversity Sector Plan simply provides information on biodiversity.

In terms of these maps, the project area marginally overlaps a Critical Biodiversity Area 1 (CBA 1). Approximately 400m<sup>2</sup> of the CBA will be disturbed for the development which includes the main dwelling and a section of the swimming pool. The remaining CBA will be managed for Alien Invasive Plants in accordance with the approved Alien Clearing Plan (Appendix L). This is in line with the objects of the Biodiversity Spatial Plan for CBA's in that degraded areas are rehabilitated or restored to near-natural state. More than 13,000m<sup>2</sup> of the heavily infested areas on the property will be left to return to near-natural state, with alien vegetation management and monitoring in place.

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

The development is outside of the Coastal Management Line but is within the Coastal Protection Zone (figure 4).

DEA&DP Coastal Management Mapp



8/8/2023, 11:58:02 AM

- ▭ Development Islands
- Coastal Protection Zone
- Coastal Management Line
- ▭ Coastal Protection Zone
- ▭ Coastal Management Line Protected Areas
- ▭ Coastal Protection Zone
- ▭ Coastal Management Line
- ▭ Coastal Management Line

1:9,028  
0 0.05 0.1 0.2 mi  
0 0.1 0.2 0.4 km  
DEA&DP, Maxar

DEA&DP

**Figure 6: Provincial Coastal Management Lines.**

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 not changed.

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

The property is not with an urban area.

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

Regarding infrastructure it can be stated that the development of Erf 1058 Hoekwil will be self-sufficient to an extent with limited needs for municipal infrastructure.

The existing route on the property will provide central access for vehicles of visitors to the proposed three tourist accommodation units.

Approximately 15 000m<sup>2</sup> of the property was heavily infested with wattle (previously cleared for farming activities early- to mid-1900s), of which 80% has been legally eradicated of alien vegetation. The majority of the development footprint (1,923m<sup>2</sup>) has been proposed within these areas in an effort to avoid undisturbed natural areas. More than 13,000m<sup>2</sup> of this area will be left to return to near-natural state, with alien vegetation management and monitoring in place.

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).
-----	--

**Water:** A new 25 mm connection to the George municipal water network can be applied for with the municipality to connect to an existing water pipe above Whites Road. The tariff and connection pipe sizes have been provided. Written communication and confirmation of the availability of a water connection is attached as Appendix E16.

**Sewer:** The development will not connect to the municipal sewer system. Wastewater will be treated on-site using a Fusion® wastewater treatment plant from Maskam Water.

**Electricity:** The development will not connect to the grid. The whole property will be electrically self-sufficient.

**Solid Waste:** A weekly refuse removal service is already available and being billed for at the address of the proposed development.

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.
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See Appendix K.

Establishing tourist accommodation units on Erf 1058 Hoekwil can contribute to economic growth in the area indirectly through the increase in demand for goods and services from local businesses such as restaurants, shops, transportation services, and recreational activities.

Additional tourist accommodation units will mean more tourists will reside in the area, especially during peak season, and will lead to increased tourism income in the greater Wilderness area. Tourists who stay in these units will contribute to the local economy by spending money on dining, shopping, and participating in recreational activities. This revenue can have a positive multiplier effect, benefiting other businesses in the area thus also contributing to community development.

Overall, tourist accommodation units in a popular holiday destination can have numerous socio-economic benefits, including economic growth, increased tourism income, job creation, community development, and diversification of the local economy.



## 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.

--

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

<p>PPP for the Pre-Application Basic Assessment has been undertaken in accordance with Regulation 41 of the EIA Regulations, 2014 (as amended) such that –</p> <ul style="list-style-type: none"> <li>❖ Two notice boards have been placed at the site in a visible location.</li> <li>❖ A notice has been published in a local newspaper, the George Herald.</li> <li>❖ All identified I&amp;AP have been notified via email, and registered mail where there is no available email address.</li> <li>❖ A register of I&amp;APs has been opened for the duration of the EA process.</li> </ul> <p>All comments received have been addressed in the Comments and Response report attached as Appendix F to the Draft Basic Assessment Report.</p>
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3. Confirm which of the State Departments and Organs of State indicated in the Notice of Intent/application form were consulted with.

STATE DEPARTMENT / ORGAN OF STATE	CONTACT PERSON
Dept of Environmental Affairs & Development Planning (DEA&DP)	Danie Swanepoel Malcolm Fredericks Dorien Werth
Coastal Management Unit, DEA&DP	leptieshaam Bekko Mercia J Liddle
Department of Health	Nathan Jacobs
Heritage Western Cape	Noluvo Toto
Transport & Public Works / Department of Infrastructure	Vanessa Stoffels
Provincial Roads Dept	Azni November
Dept of Agriculture Land Use Management	Cor van der Walt/Brandon Layman
Department of Water & Sanitation	John Roberts
DFFE: Forestry Management	Melanie Koen
Breede-Gouritz Catchment Management Agency	R Mphahlele
Cape Nature Land Use Advice	Megan Simons
SANPARKS	Vanessa Weyer
Southern Cape Fire Protection Agency	Dirk Smit
SANRAL	Nicole Abrahams
South African Civil Aviation Authority	Lizell Stroh
George Municipality	Lauren Josias
Garden Route district Municipality	Dr. Nina Viljoen

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

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

To be completed in Final BAR
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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.

See Appendix F for comments and response table. This will be completed in Final BAR.

**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?	<b>YES</b> ✓	NO
1.2.	Provide the name and or company who conducted the specialist study.		
Report on the Geotechnical Investigation undertaken for Erf 1058, Whites Avenue, Hoekwil, Wilderness in the Western Cape Province. Casper Badenhorst TESTPRO Laboratory (Pty) Ltd 24 July 2023			
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
None			
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 report prepared by Casper Badenhorst (TESTPRO Laboratory (Pty) Ltd, 24 July 2023) found that ground water was encountered at 0.64m. It was not clear if this was a permanent or perched water table. It was assumed to be permanent and subject to seasonal fluctuations.  No significant problems were noted, with no refusals encountered at depths shallower than 800mm.			

Excavation constraints may be expected at depths exceeding 1 meter.

## 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.		
<p>AQUATIC COMPLIANCE STATEMENT: Erf 1058, Wilderness, Western Cape.                  Dr. James M. Dabrowski                  Confluent Environmental                  June 2023</p>			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		

A site visit was conducted by Confluent Environmental on 2nd of June 2023 during which time the entire extent of the proposed development footprint was traversed by foot. The property slopes down steeply to the south-east towards the Touws River and to the west towards the unnamed non-perennial drainage line. The drainage line is confirmed as a non-perennial drainage line, with very limited habitat development. Its primary function is to convey hydrological flows following periods of heavy rainfall and it serves limited function with respect to hosting aquatic biota. The drainage line is very narrow (less than 2 m wide) and is confined to a narrow, steep sided, heavily vegetated valley. Vegetation comprises of coastal thicket that has been heavily invaded by *Acacia mearnsii*. Apart from the drainage line there are no hydro-geomorphological landscape features (depressions, confined valleys, channels etc.) indicating the presence of a watercourse (i.e. stream, river or wetland) within the development footprint (Figure 7). In terms of legislation pertaining to the NWA, the development falls outside of the regulated area of the drainage line (i.e. outside of the riparian zone and 1:100 year floodline) and outside the regulated area of a wetland. The Freshwater Compliance Statement is attached as Appendix G4.

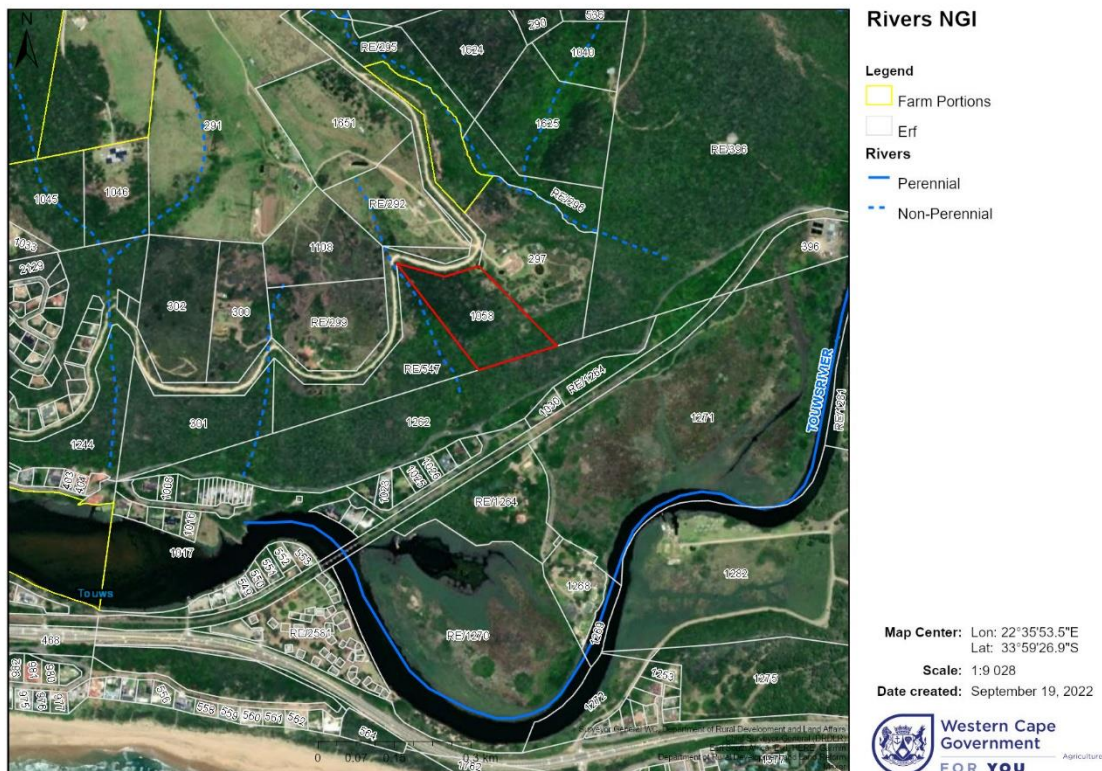


Figure 7: Non- Perennial River to the west of the property.



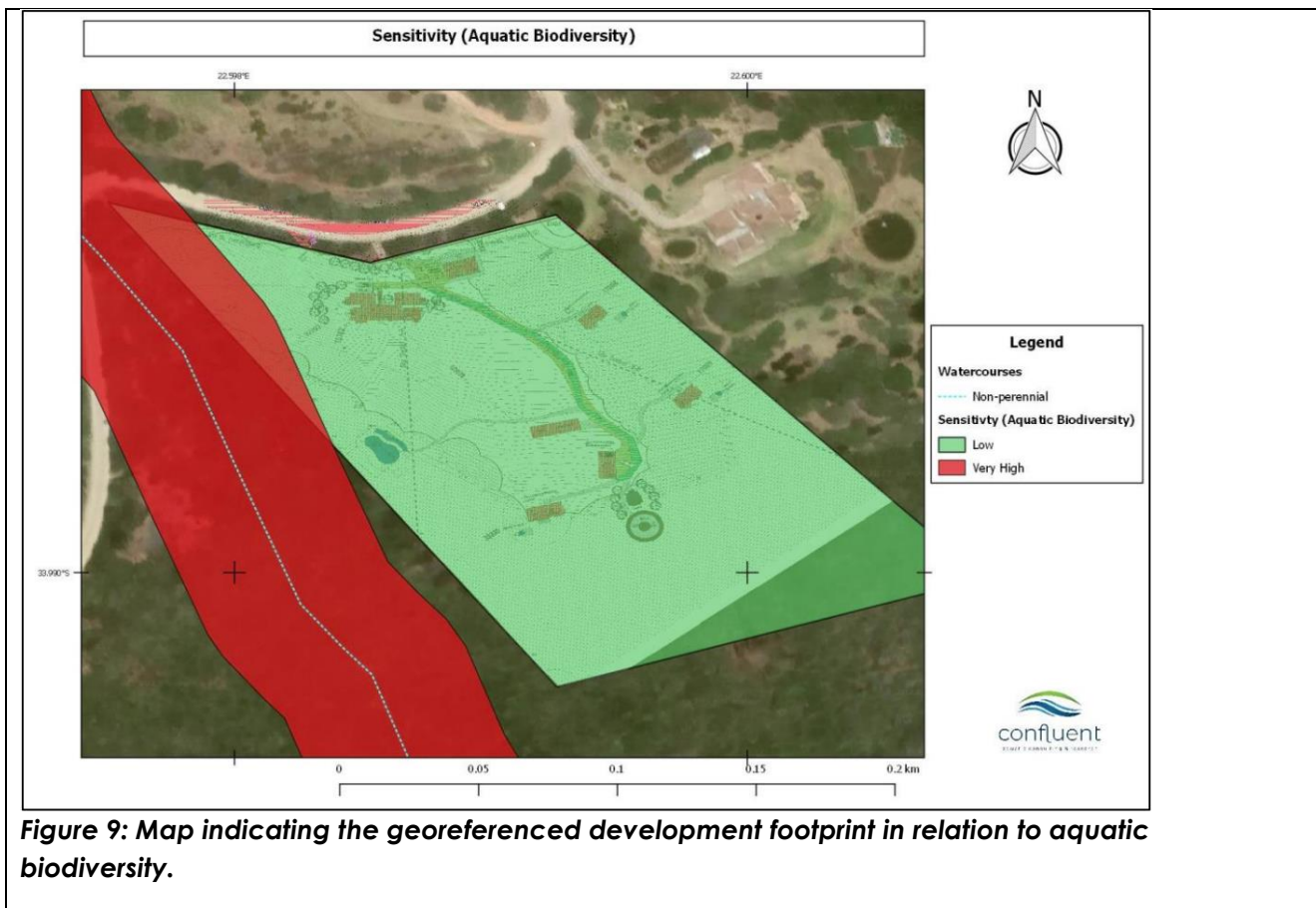


**Figure 8: Photographs of the property including view to the south (A), the densely vegetated watercourse to the west of the property (B), dense stands of *A. mearnsii* (C) poorly vegetated ground below *A. mearnsii* thickets (D) (Taken from Aquatic Compliance Statement by Confluent Environmental, June 2023).**

Buffer determination followed a conservative approach and did not consider the implementation of mitigation measures. The buffer is therefore appropriate for a worst-case development scenario, given the catchment and buffer characteristics which are summarised as follows:

- ❖ It was assumed that some form of erosion and sediment control will be implemented on site during the construction phase.
- ❖ Mean Annual Precipitation Class: 801 – 1000 mm.
- ❖ Rainfall Intensity: Zone 4.
- ❖ The inherent runoff potential of soil in the catchment area is low (A/B soils).
- ❖ Average slope of the rivers catchment is >11 %.
- ❖ Inherent erosion potential of the catchment soils is moderate (K factor 0.5 – 0.7).
- ❖ The slope of the buffer area is moderately steep (20 - 40 %).
- ❖ Interception characteristics of the vegetation is considered to be Poor (dominated by *A. mearnsii* with poor vegetation coverage beneath trees).

Based on these inputs the buffer for drainage line is set to 36 m. Any development that occurs within the buffer would be considered to be of a Very High sensitivity, while areas outside of the buffer are considered to be of a Low sensitivity. The development footprint (all structures and hard landscaping) falls entirely within the Low sensitivity area (Figure 9).



**Figure 9: Map indicating the georeferenced development footprint in relation to aquatic biodiversity.**

### 3. Coastal Environment

3.1.	Was a specialist study conducted?	YES	<b>NO✓</b>
3.2.	Provide the name and/or company who conducted the specialist study.		
N/A			
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
<p>Due to the subject property's location within the CPZ, Section 63 of the NEM: ICMA must be considered where an authorisation is required in terms of Chapter 5 of the NEMA. Furthermore, Section 62 of the NEM: ICMA obliges all organs of state that regulates the planning of land to apply that legislation in a manner that gives effect to the purpose of the CPZ. As such, Section 63 should be considered by local authorities for land use decision making.</p> <p>According to Section 63(1)(c) of the ICMA, where an environmental authorisation in terms of Chapter 5 of the National Environmental Management Act is required for coastal activities, the competent authority must take into account all relevant factors, including whether coastal public property, the <u>coastal protection zone</u> or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and protecting those areas.</p> <p>The purpose for which a coastal protection zone is established as set out in section 17 of ICMA, is as follows:  <i>The coastal protection zone is established for enabling the use of land that is adjacent to coastal public property or that plays a significant role in a coastal ecosystem to be managed, regulated or restricted in order to -</i></p> <p>a) <i>protect the ecological integrity, natural character and the economic, social and aesthetic value of coastal public property:</i></p>			

- b) avoid increasing the effect or severity of natural hazards in the coastal zone;
- c) protect people, property and economic activities from risks arising from dynamic coastal processes, including the risk of sea-level rise;
- d) maintain the natural functioning of the littoral active zone;
- e) maintain the productive capacity of the coastal zone by protecting the ecological integrity of the coastal environment; and
- f) make land near the seashore available to organs of state and other authorised persons for -
  - (i) performing rescue operations; or
  - (ii) temporarily depositing objects and materials washed up by the sea or tidal waters.

### **Section 63. Environmental authorisations for coastal activities**

(1) Where an environmental authorisation in terms of Chapter 5 of the National Environmental Management Act is required for coastal activities, the competent authority must take into account all relevant factors, including –

*(a) the representations made by the applicant and by interested and affected parties;*

This report will be subject to a public participation process which will generate representations by I&APs. These will be included in the final BAR submitted to the competent authority for their consideration.

*(b) the extent to which the applicant has in the past complied with similar authorisations;*

Not Applicable, the applicant has not applied for any similar authorisations.

*(c) whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and protecting those areas;*

The property is approximately 800m from the high-water mark of the sea, and at an average height above sea level of between 64 – 110 meters. As such it is not subject to coastal erosion effects such as the risks arising from dynamic coastal processes, including the risk of sea-level rise. There are no impacts on the littoral active zone, coastal public property, or ecological integrity of the coastal environment due to its position.

*(d) the estuarine management plans, coastal management programmes, coastal management lines and coastal management objectives applicable in the area;*

The property will not be affected by risk zones as per the Department's coast risk modelling for the Garden Route District project.

*(e) the socio-economic impact if the activity –*

*(i) is authorised;*

Tourist accommodation units in a popular holiday destination can have numerous socio-economic benefits, including economic growth, increased tourism income, job creation, community development, and diversification of the local economy

*(ii) is not authorised;*

Loss of socio-economic benefits as described above.

*(g) the likely impact of coastal environmental processes on the proposed activity;*

*(Section 63(1)(g) amended by section 33(c) of Act 36 of 2014)*

Due to the property's proximity to the highwater mark (800m) and the height above sea-level (64-110m), it is unlikely to be subjected to coastal erosion effects and risks arising from dynamic coastal processes.

*(h) whether the development or activity—*

*(i) is situated within coastal public property and is inconsistent with the objective of conserving and enhancing coastal public property for the benefit of current and future generations;*

No, the development is located on private property.

*(ii) is situated within the coastal protection zone and is inconsistent with the purpose for which a coastal protection zone is established as set out in section 17;*

The subject area in its entirety is located within the Coastal Protection Zone ("CPZ") as defined in Section 16 of the NEM: ICMA and partially seaward of the Garden Route District coastal management line ("CML") delineated by the Department in the project for the coastal management line.

The development is not inconsistent with the purpose of the CPZ as it does not play a significant role in a coastal ecosystem. It is unlikely to be subjected to coastal erosion effects and risks arising from dynamic coastal processes, and will not be affected by risk zones as per the Department's coast risk modelling for the Garden Route District project.

*(iii) is situated within coastal access land and is inconsistent with the purpose for which coastal access land is designated as set out in section 18;*

The property is not located within coastal access land.

*(iv) is likely to cause irreversible or long-lasting adverse effects to any aspect of the coastal environment that cannot satisfactorily be mitigated;*

No. The property is approximately 800m from the high-water mark of the sea, and at an average height above sea level of between 64 – 110 meters and therefore will not impact on the littoral active zone, coastal public property, or ecological integrity of the coastal environment due to its position.

*(v) is likely to be significantly damaged or prejudiced by dynamic coastal processes;*

No. The property is approximately 800m from the high-water mark of the sea, and at an average height above sea level of between 64 – 110 meters and therefore will not impact on the littoral active zone, coastal public property, or ecological integrity of the coastal environment due to its position.

*(vi) would substantially prejudice the achievement of any coastal management objective;*

No. The development does not play a significant role in a coastal ecosystem. It is unlikely to be subjected to coastal erosion effects and risks arising from dynamic coastal processes, and will not be affected by risk zones as per the Department's coast risk modelling for the Garden Route District project. The development as proposed will not prejudice any coastal management objective.

*(vii) would be contrary to the interests of the whole community;*

No. Tourism and recreation are ways to achieve economic growth and adds to the sense of place of the greater George municipal area as the gateway to the Garden Route. The GMSDF states that tourism accommodation and uses in varying formats in the urban and rural environments is a generally accepted principle.

(Section 63(1)(h) substituted by section 33(d) of Act 36 of 2014)

*(i) whether the very nature of the proposed activity or development requires it to be located within coastal public property, the coastal protection zone or coastal access land;*

The property is located within the coastal protection zone, however it is 800m from the high water mark of the sea and will not affect coastal public property or coastal access land.



(j) whether the proposed activity or development will provide important services to the public when using coastal public property, the coastal protection zone, coastal access land or a coastal protected area;

Not Applicable, it is private property.

(5) The competent authority must ensure that the terms and conditions of any environmental authorisation are consistent with any applicable coastal management programmes and promote the attainment of coastal management objectives in the area concerned.

The Basic Assessment Report and specialist studies assist the Competent Authority in their consideration of the application for environmental authorisation.

(6) Where an environmental authorisation is not required for coastal activities, the Minister may, by notice in the Gazette list such activities requiring a permit or licence.

Not applicable.

3.4. Explain how estuary management plans (if applicable) has influenced the proposed development.

N/A

3.5. Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.

Erf 1058 is approximately 800m from the high-water mark of the sea, and at an average height above sea level of between 64 – 110 meters. As such it is not subject to coastal erosion effects such as the risks arising from dynamic coastal processes, including the risk of sea-level rise. There are no impacts on the littoral active zone, coastal public property, or ecological integrity of the coastal environment due to its position.

#### 4. Biodiversity

4.1.	Were specialist studies conducted?	YES	NO
4.2.	Provide the name and/or company who conducted the specialist studies.	<p>Plant Species, Animal Species and Terrestrial Biodiversity Assessment Report for Erf 1058, Wilderness, George in the Western Cape Province            David Hoare Consulting (Pty) Ltd            29 April 2024</p>	
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><b><i>This section is taken from the Plant, Animal and Terrestrial Biodiversity Assessment by Dr. David Hoare.</i></b></p> <p>The site is mapped as occurring within a regional vegetation type called Garden Route Granite Fynbos. To the north of this vegetation type is another regional vegetation type called Garden Route Shale Fynbos. There is also Goukamma Dune Thicket mapped as occurring in areas to the south of the site, which structurally matches remaining vegetation seen on site. Detailed descriptions of vegetation types are published and available on the SANBI BGIS website (<a href="http://bgis.sanbi.org">http://bgis.sanbi.org</a>).</p> <p>On-site observations indicate that the patterns seen on site and the surrounding areas do NOT conform to these published descriptions of the vegetation. The combination of the two regional Fynbos vegetation units (Garden Route Granite Fynbos and Garden Route Shale Fynbos) are shown as extending from Keurbooms River in the east to north of Mossel Bay in the west, occurring on the inland plains and undulating hills between the Outeniqua Mountains and the coastal systems (part of which is shown in Figure 10). These two regional Fynbos units form a landscape mosaic with Southern Afrotemperate Forest, although forest tends to only occur closer to the mountains. Unfortunately, historical urban and agricultural development, as well as plantation forestry, has converted most of these areas mapped as Garden Route Granite Fynbos and Garden Route Shale</p>	

Fynbos from the original natural state. The existence of fynbos has been assumed during the mapping of the regional vegetation types (Mucina et al. 2006), but this is not supported by patterns seen on the ground.



**Figure 10: Regional vegetation types in different topographical regions of the general area that includes site.**

Most of the remaining patches of natural vegetation in the mapped fynbos units for the Garden Route (Garden Route Granite Fynbos and Garden Route Shale Fynbos) are mesic thicket, which is mapped relatively well in the 2018 South African National Landcover map (see Figure 11 where "thicket" as a structural land cover class is shown as dark areas within the mapped fynbos vegetation units). This pattern is stable and can be seen in historical aerial photographs from 1936 (Figure 12) and 1957 (not shown). Thicket is, in fact, the typical vegetation seen in the Wilderness area (see example in Figure 13). The only places that fynbos appears to occur naturally is in small patches on dryer, north-facing slopes, but this is very rare (see small patches in the 2018 South African National Landcover map for the area shown in Figure 11). Secondary (impoverished) fynbos is common in previously cultivated areas only.

In the area between George and Knysna are two Thicket vegetation types, Dune Thicket (growing on sedimentary geology) and an undefined (undescribed) mesic thicket unit (growing on Cape geology rock formations, including granite and shale). The Dune Thicket is correctly mapped (called Goukamme Dune Thicket around Wilderness), but there is no mapped mesic thicket around Wilderness, which is incorrect. The closest (spatially and floristically) described thicket unit in the VegMap project is called Vanstadens Forest Thicket, but the description is not a match for the mesic thicket occurring in the Wilderness area.

Due to mapping inaccuracies, the vegetation that occurs on site does not match the mapped units shown here. Mesic thicket that is found on site occurs more widely than mapped and includes most of the areas mapped as Garden Route Granite Fynbos and Garden Route Shale Fynbos. A new regional vegetation unit is required to adequately describe this vegetation.

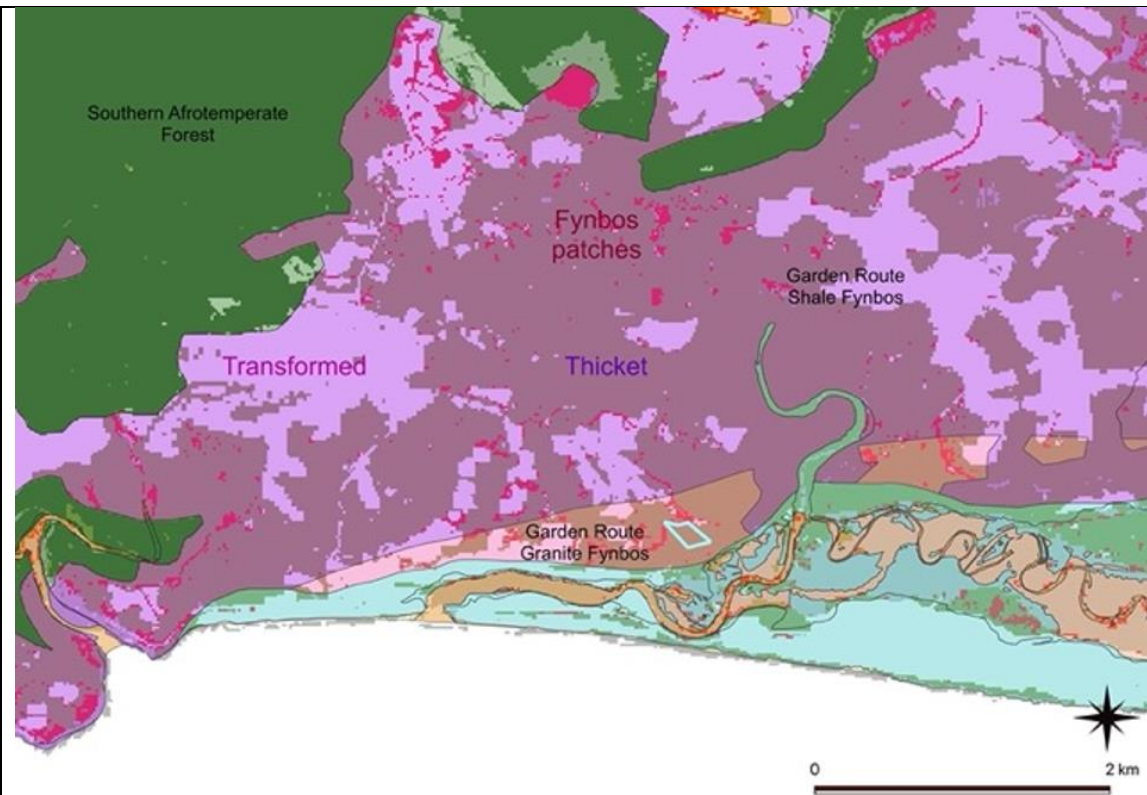


Figure 11: National landcover categories in fynbos regional vegetation types of the study area. Fynbos patches are shown in dark pink, transformed areas as light pink, and thicket as dark areas

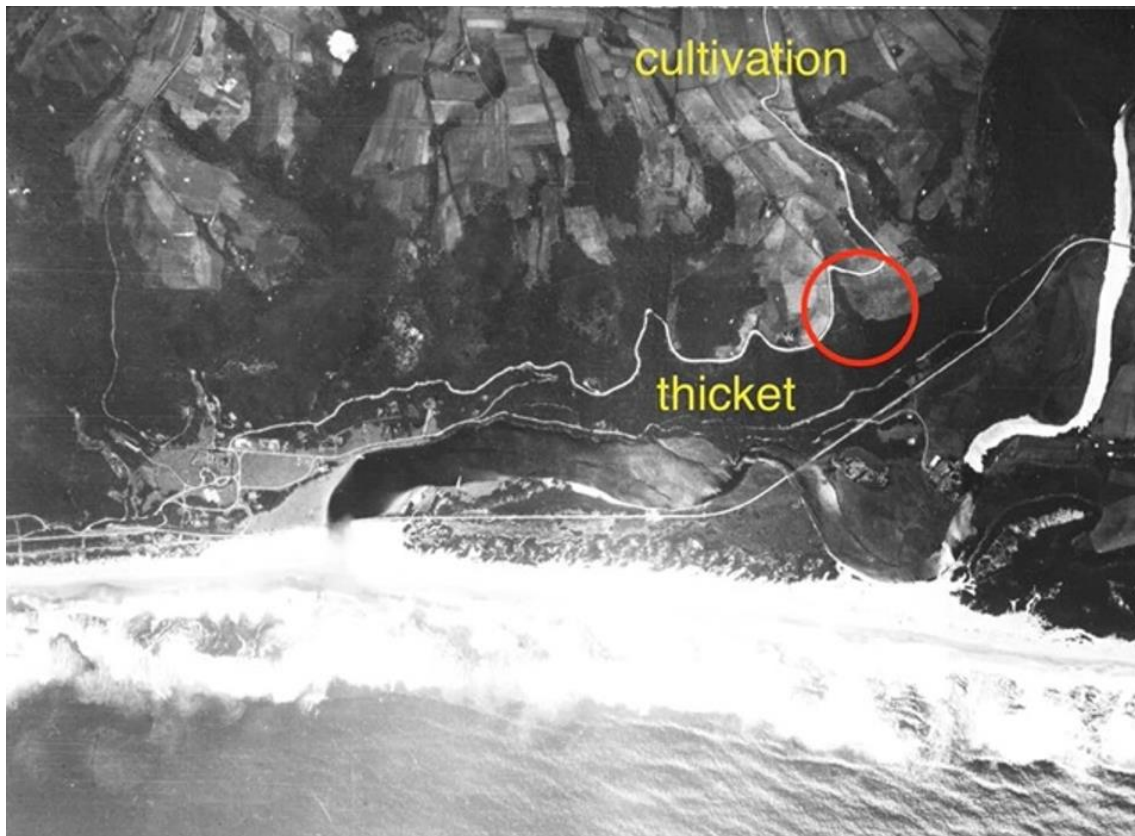


Figure 12: Historical aerial photograph dated 31/12/1936 (site is within the red circle).





**Figure 13: Typical vegetation of the Wilderness area, looking from Wilderness Heights towards Island Lake.**

### **Garden Route Granite Fynbos:**

#### **Distribution**

This vegetation type is found in the Western and Eastern Cape Provinces: patches along the coastal foothills of the Langeberg at Grootberg (northeast of Heidelberg), the Outeniqua Mountains from Cloete's Pass via the Groot Brak River Valley, Hoekwil, Karatara, Barrington and Knysna to Plettenberg Bay. Patches from the Bloukrans Pass along coastal platform shale bands south of the Tsitsikamma Mountains via Kleinbos and Fynboshoek to south of both Clarkson and the Kareedouw Mountains. Altitude 0–500 m.

#### **Vegetation & Landscape Features**

Undulating hills and moderately undulating plains on the coastal forelands. Structurally this is tall, dense proteoid and ericaceous fynbos in wetter areas, and graminoid fynbos (or shrubby grassland) in drier areas. Fynbos appears confined to flatter more extensive landscapes that are exposed to frequent fires—most of the shales are covered with afrotemperate forest. Fairly wide belts of *Virgilia oroboides* occur on the interface between fynbos and forest. Fire-safe habitats nearer the coast have small clumps of thicket, and valley floors have scrub forest (Vlok & Euston-Brown 2002).

#### **Geology & Soils**

Acidic, moist clay-loam, prisma-cutanic and pedocutanic soils derived from Caimans Group and Eccia (in the east) shales. Land types mainly Db and Fa.

#### **Climate**

Non-seasonal rainfall dominates the region, with MAP 310–1 120 mm (mean: 700 mm), relatively even throughout the year, but with a slight low in winter. Mean daily maximum and minimum temperatures 27.6°C and 6.5°C for January and July, respectively. Frost incidence 2 or 3 days per year.

**Important Taxa:**

<b>Growth form</b>	<b>Species</b>
<b>Tall shrubs</b>	<i>Leucadendron eucalyptifolium</i> (d), <i>Protea aurea</i> subsp. <i>aurea</i> (d), <i>P. coronata</i> (d), <i>Leucospermum formosum</i> , <i>Metalasia densa</i> , <i>Passerina corymbosa</i> , <i>Protea neriifolia</i> , <i>Rhus lucida</i> <sup>†</sup>
<b>Low shrubs</b>	<i>Acmadenia alternifolia</i> , <i>A. tetragona</i> , <i>Anthospermum aethiopicum</i> , <i>Cliffortia ruscifolia</i> , <i>Elytropappus rhinocerotis</i> , <i>Erica hispidula</i> , <i>Helichrysum cymosum</i> , <i>Leucadendron salignum</i> , <i>Pelargonium cordifolium</i> , <i>Phyllica axillaris</i> , <i>P. pinea</i> , <i>Psoralea monophylla</i> , <i>Selago corymbosa</i> .
<b>Herbs</b>	<i>Helichrysum felinum</i>
<b>Geophytic herb</b>	<i>Pteridium aquilinum</i> (d), <i>Eriospermum vermiforme</i>
<b>Succulent herb</b>	<i>Crassula orbicularis</i>
<b>Herbaceous succulent climber</b>	<i>Crassula roggveldii</i>
<b>Graminoid</b>	<i>Ischyrolepis sieberi</i> (d), <i>Aristida junciformis</i> subsp. <i>galpinii</i> , <i>Brachiaria serrata</i> , <i>Cymbopogon marginatus</i> , <i>Elegia juncea</i> , <i>Eragrostis capensis</i> , <i>Ischyrolepis gaudichaudiana</i> , <i>Restio triticeus</i> , <i>Themeda triandra</i> , <i>Tristachya leucothrix</i> .

**Southern Afrotropical Forest:****Distribution**

Western Cape, Eastern Cape and (only few patches) in Northern Cape Provinces: The largest complex is found in the southern Cape along the narrow coastal strip (250 km long) between Humansdorp in the east and Mossel Bay (Knysna-Tsitsikamma forest region)—here occurring on sheltered seaward slopes, plateaux and coastal scarps. The easternmost outlier forest patches occur near Port Elizabeth, while westwards floristically impoverished forms of these forests occur along the feet of south- and east-facing slopes and in deep kloofs and ravines of the Cape Fold Belt mountains as far as the Cape Peninsula in the west. The northernmost localities are near Vanrhynsdorp Pass and in the Matsikamma Mountains. At altitudes ranging from about 10 m (Tsitsikamma region) to 600 m (most of patches), with notable outliers occurring as high as 1 060 m.

**Vegetation & Landscape Features**

Tall, multilayered afrotropical forests dominated by yellowwoods (*Afrocarpus falcatus* and *Podocarpus latifolius*), *Ocotea bullata*, *Olea capensis* subsp. *macrocarpa*, *Pterocelastrus tricuspidatus*, *Platylophus trifolius* etc. In scree and deep-gorge habitats *Cunonia capensis*, *Heeria argentea*, *Metrosideros angustifolia*, *Podocarpus elongatus* and *Rapanea melanophloeos* predominate. The shrub understorey and herb layers are well developed, especially in mesic and wet habitats.

**Geology & Soils**

Soils varying from shallow (and skeletal) Mispah, Glenrosa and Houwhoek forms to sandy humic Fernwood form, derived from Table Mountain Group sandstones and shales of the Cape Supergroup and partly also from Cape Granite.

**Important Taxa**

Tall Trees: *Afrocarpus falcatus* (d), *Cunonia capensis* (d), *Curtisia dentata* (d), *Nuxia floribunda* (d), *Ocotea bullata* (d), *Olinia ventosa* (d), *Podocarpus elongatus* (d), *P. latifolius* (d), *Pterocelastrus tricuspidatus* (d), *Rapanea melanophloeos* (d), *Ilex mitis*, *Olea capensis* subsp. *macrocarpa*.

Small Trees: *Canthium inerme* (d), *Cassine peragua* (d), *Diospyros whyteana*.

Tree Fern: *Cyathea capensis* (d).

Herbaceous Climber: *Cissampelos torulosa*.

Epiphytic Herb: *Angraecum pusillum*.

Tall Shrubs: *Burchellia bubalina* (d), *Trichocladus crinitus* (d), *Sparmannia africana*.

Geophytic Herbs: *Blechnum capense* (d), *B. tabulare* (d), *Dietes iridioides* (d), *Rumohra adiantiformis* (d), *Todea barbara* (d), *Oxalis incarnata*.

Graminoid: *Oplismenus hirtellus* (d).

### **Biogeographically Important Taxa**

(<sup>°</sup>Endemic of Capensis, <sup>W</sup>Western distribution limit)

Tall Trees: *Brabejum stellatifolium*<sup>°</sup>, *Ochna arborea* var. *arborea*<sup>W</sup>.

Small Trees: *Gonioma kamassi*<sup>W</sup> (d), *Heeria argentea*<sup>°</sup> (d), *Metrosideros angustifolia*<sup>°</sup> (d), *Allophylus decipiens*<sup>W</sup>, *Brachylaena neriifolia*<sup>°</sup>, *Cassine schinoides*<sup>°</sup>, *Lachnostylis hirta*<sup>°</sup>, *Virgilia divaricata*<sup>°</sup>.

Woody Climber: *Asparagus scandens*<sup>°</sup>.

Epiphytic Herb: *Mystacidium capense*<sup>W</sup>.

Tall Shrub: *Laurophyllus capensis*<sup>°</sup>.

Herb: *Gerbera cordata*<sup>W</sup>, *Streptocarpus rexii*<sup>W</sup>.

Geophytic Herbs: *Liparis capensis*<sup>°</sup>.

Graminoids: *Ischyrolepis subverticillata*<sup>°</sup>, *Schoenoxiphium lanceum*<sup>°</sup>.

### **Endemic Taxon**

Tall Tree: *Platylophus trifolius* (d).

Small Trees: *Apodytes geldenhuysii*, *Cryptocarya angustifolia*, *Virgilia oroboides* subsp. *ferruginea*, *V. oroboides* subsp. *oroboides*.

Megaherb: *Strelitzia alba* (d).

Geophytic Herbs: *Amauropelta knysnaensis*, *Clivia mirabilis*, *Freesia sparrmannii*, *Polystichum incongruum*.

Graminoid: *Schoenoxiphium altum*.

### **Conservation status of broad vegetation types:**

The conservation status in accordance with the Revised National List of Ecosystems (Government Notice No 2747 of 18 November 2022) published under the National Environmental Management: Biodiversity Act (Act No. 10, 2004), is Critically Endangered.

**Table 1: Conservation status of different vegetation types occurring in the study area.**

<b>Vegetation Type</b>	<b>Conservation status:</b>
Garden Route Granite Fynbos	Critically Endangered
Southern Afrotropical Forest	Least Concern
Goukamma Dune Thicket	Least Concern

### **Plant species recorded on site:**

A total of 92 plant species were recorded on site, of which 5 are declared weeds and/or alien invader plants, 2 are naturalized exotic species, 12 are indigenous weedy species that mostly occur in disturbed locations, 10 are fynbos species that typically colonise disturbed areas, such as old lands and recently felled plantations, and the remainder (63) are indigenous species that would be expected to occur in some form of indigenous vegetation. Of the 63 indigenous species recorded on site, 29 (46%) are entirely restricted to the mesic thicket/forest areas and 22 (35%) are woody species that have emerged in the secondary thicket. Another 9 species (14%) are herbaceous species typical of woody vegetation.

### **Habitats on site:**

Based on a detailed field survey to verify conditions on site, a detailed landcover and habitat mapping exercise was undertaken for the site. This identified two main habitats occurring on site,

shown in Figure 9. These are mapped as Mesic Thicket/Forest and Secondary Thicket. There are also areas of Alien trees. The habitat assessment is important for understanding the suitability of habitat on site for various plant and animal species of concern, which usually have very specific habitat requirements.

**Mesic thicket/Forest**

The steep-sided slopes in the southern part of the site contain indigenous mesic thicket or low forest (see Figure 9) that should be classified and mapped as a form of Albany Thicket. It has a closed canopy, open to tangled understorey and relatively low structure, therefore qualifies to be mapped as thicket. Based on observations of constituent species, it resembles mesic thicket in other parts of the Wilderness section of the Garden Route. There is no mapped mesic thicket around Wilderness, which is incorrect. The closest (spatially and floristically) described thicket unit in the VegMap project is called Vanstadens Forest Thicket, but the description is not a match for the mesic thicket occurring in the Wilderness area.

Observed species in the Mesic thicket/forest include the trees / tall shrubs, *Acokanthera oppositifolia*, *Capparis sepiaria*, *Carissa bispinosa*, *Cussonia thyrsiflora*, *Diospyros dichrophylla*, *Elaeodendron croceum*, *Lauridia tetragona*, *Myroxylon aethiopicum*, *Ochna arborea*, *Ochna serrulata*, *Olea capensis*, *Scolopia zeyheri* and *Trimeria grandifolia*, and the herbaceous species, *Anemia cafferorum*, *Asparagus africanus*, *Asparagus setaceus*, *Asplenium rutifolium*, *Commelina africana*, *Cynanchum viminale*, *Dietes iridioides*, *Euphorbia kraussiana*, *Galopina circaeoides*, *Gerbera cordata*, *Habenaria arenaria*, *Megathyrus maximus*, *Ornithogalum graminifolium*, *Peperomia retusa*, *Rhoicissus digitata*, *Rumohra adiantiformis*, *Senecio macroglossus*, *Stachys aethiopica*, *Streptocarpus rexii* and *Tulbaghia capensis*. This species composition is very similar to that found in nearby similar thicket in other parts of Wilderness. *Asparagus setaceus*, *Asplenium rutifolium*, *Chaenostoma sp.*, *Crassula orbicularis*, *Stachys aethiopica*, *Cheilanthes hirta*, *Gerbera cordata*, *Oxalis algoensis*, *Streptocarpus rexii*, and *Tritoniopsis caffra*.



**Figure 14: Map of habitats on site.**



### Secondary Thicket mosaic

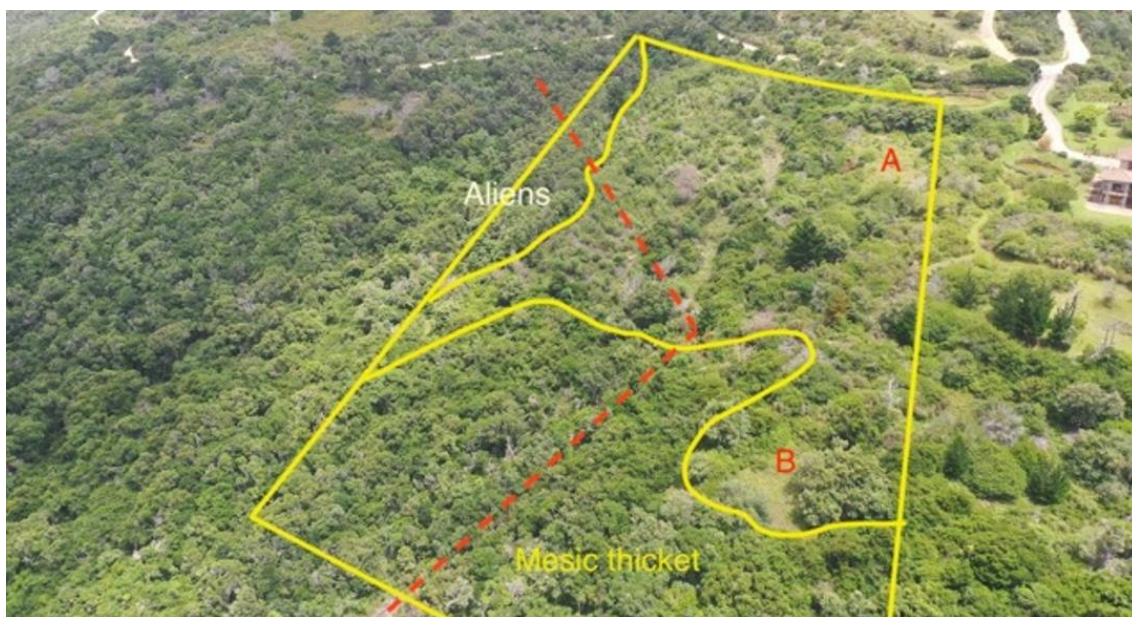
The vegetation in the upper parts of the site (north of the mesic thicket) is a secondary thicket that occurs as several bush-clumps interspersed with more bare areas of herbaceous vegetation (the largest are shown as area A and area B in Figure 15), as well as significant amounts of alien invasive shrubs. These areas were previously cultivated, as can be seen from historical aerial photographs, which means that the vegetation in these areas is a secondary woodland that is about 50 years old.

Woody species (trees and shrubs) that have become established in these secondary vegetation areas include *Allophylus decipiens*, *Buddleja saligna*, *Diospyros whyteana*, *Elaeodendron croceum*, *Grewia occidentalis*, *Gymnosporia buxifolia*, *Gymnosporia nemorosa*, *Myrsine africana*, *Olea europaea*, *Pittosporum viridiflorum*, *Pterocelastrus tricuspidatus*, *Putterlickia pyracantha*, *Rapanea melanophloeos*, *Scutia myrtina*, *Searsia chirindensis*, *Searsia lucida*, *Searsia pallens*, *Sideroxylon inerme*, *Tarchonanthus littoralis*, *Trimeria grandifolia*, *Vepris lanceolata*, and *Zanthoxylum capense*. This is accompanied by a suite of herbaceous species found in woody vegetation, not fynbos.

There are several open grassy areas within the bushclumps (A and B in Figure 15). They are often dominated by the grass, *Stenotaphrum secundatum*, accompanied by several herbaceous weedy species, including *Arctotheca prostrata*, *Carpobrotus edulis*, *Cyperus congestus*, *Eragrostis curvula*, *Gomphocarpus physocarpus*, *Hibiscus trionum*, *Melica racemosa*, *Nidorella ivifolia*, *Paspalum urvillei*\*, *Physalis peruviana*\*, *Pseudognaphalium luteoalbum*, *Senecio ilicifolius* and *Solanum giganteum*. The small tree, *Tarchonanthus littoralis*, often grows within or on the margin of these clearings.

The elements of fynbos vegetation on site occur as patches within the secondary thicket vegetation. The species composition is typical of recent secondary fynbos that has been recorded within recently cleared pine plantations on sandy soils near Knysna, including *Erica sparsa*, *Agathosma ovata*, *Passerina corymbosa*, *Helichrysum petiolare*, *Helichrysum foetidum*, *Helichrysum cymosum*, *Pelargonium capitatum*, *Seriphium plumosum*, *Searsia lucida* and *Searsia pallida*.

The fynbos elements on site are NOT representative of the regional vegetation type, Garden Route Granite Fynbos, nor are they located in parts of the landscape where fynbos would be expected to occur.



**Figure 15: Drone image of the site with approximate position of boundaries shown, as well as some important features on site. The red dashed line is the powerline that crosses the site.**

## Aliens

There are parts of the site in the valley on the western side that are completely dominated by alien shrubs, primarily *Acacia mearnsii*. These have no biodiversity value and represent a significant threat to surrounding ecosystems, especially those downslope and downstream. There are also two places near the eastern boundary dominated by single large pine trees (easily visible in Figure 15).

## Western Cape Biodiversity Spatial Plan:

The Western Cape Biodiversity Spatial Plan (WCBSP) map for George shows that parts of the site are within a CBA1 area (Figure 16). This CBA1 area continues beyond the boundaries of the site. This indicates that the vegetation on this part of the site is considered to be highly important for the conservation of biodiversity in the Province as well as for maintaining ecological patterns in the landscape.

The WCBSP map only shows the CBA1 areas on site, but the ESA1 area adjacent to the site exists independently through the drainage line that runs down the western side of the site, i.e. if the CBA1 area was not defined for the site, there would still be an ESA1 area running through the site.

The site is also in close proximity to a large protected area, both to the south and to the east. The CBA1 areas on site therefore have value as a buffer for these protected areas, as well as for the preservation of biodiversity patterns and processes.

The on-site habitat assessment shows that the southern part of the site is in a natural state, and it therefore verifies the status of these areas as being of high biodiversity value. The area along the western boundary within the CBA1 was found to consist mostly of alien trees and is therefore highly degraded.

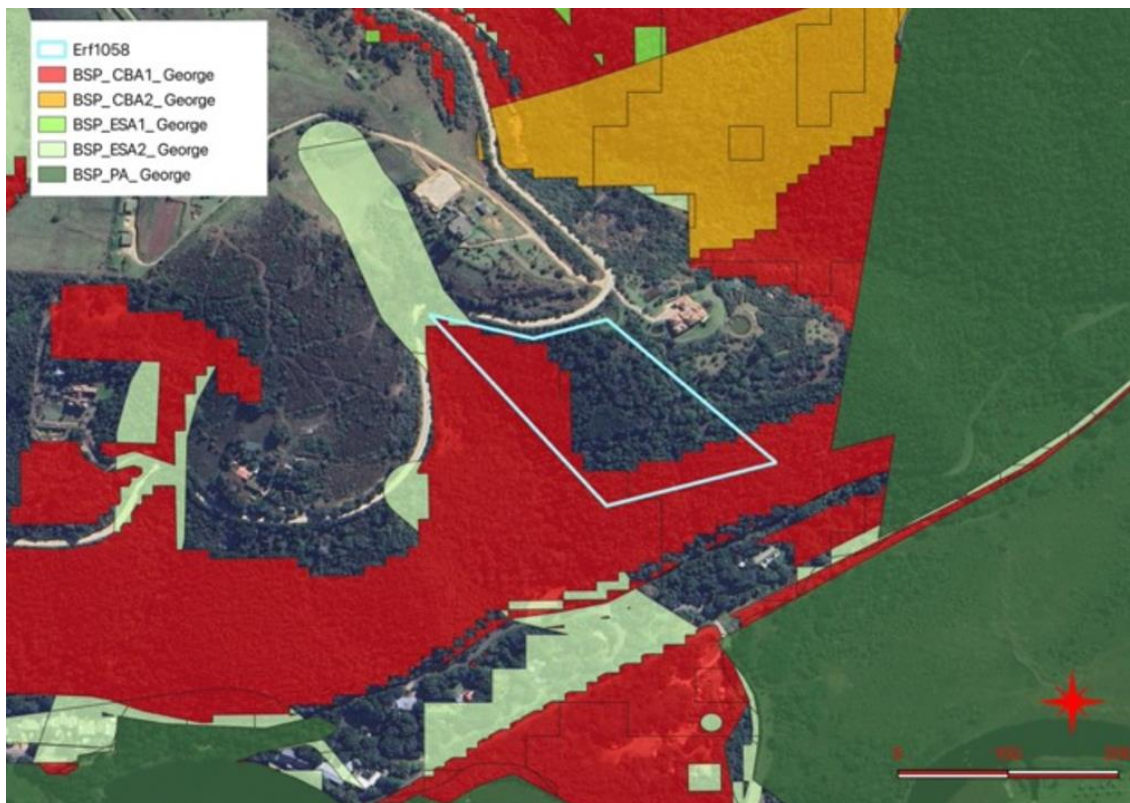


Figure 16: Western Cape Biodiversity Spatial Plan of the site and surrounding areas.

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.

### **Critical Biodiversity Areas**

Category 1: CBA: Terrestrial

Category 2: CBA: Terrestrial

Definition: Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.

Objective: Maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.

Areas within the CBA identified as being of high biodiversity value within the mesic thicket will not be disturbed by the development. This area is located in the southern portion of the property as shown in figure 16. The area within the CBA that will be impacted to the west of the property consist mostly of alien trees and is therefore highly degraded (Hoare 2024).

The objective for CBAs requires these areas to be maintained in a natural or near-natural state, with no further loss of natural habitat, and that degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate. From the Terrestrial Biodiversity Assessment (Hoare 2024) it can be determined that near natural and natural vegetation will remain intact, and degraded areas infested with alien vegetation will be rehabilitated.

The proposed development can be regarded as low impact as it is low density with a relatively small footprint ( $\pm 6.4\%$  coverage of the total property), and the objective of the development is to use existing disturbed spaces and natural open areas for construction to minimise disturbance of vegetation, and to blend into the surrounding environment. Restoration of indigenous vegetation and conservation outcomes forms an important aspect of the development such that the property will be rezoned to Open Space Zone III (nature conservation area).

Open Space Zone III aims to provide for the conservation of natural resources in areas that have not been proclaimed as nature areas (non-statutory conservation), in order to sustain flora and fauna and protect areas of undeveloped landscape including woodlands, ridges, wetlands and the coastline. A range of consent uses is provided to supplement and support the main objective of this zone. With the rezoning of the property, it is proposed to conserve the property as a nature area along Whites Road and in a scenic area, located close to the Ebb & Flow Rest camp of SANParks. Tourist accommodation is one of the eight consent uses possible in a nature conservation area, and the income generated will ensure continued management of the property for the best possible conservation outcome.

An aerial photograph from 1936 shows that a significant part of the site was cultivated on that date (figure 17). The cultivation excluded the areas along the southern side of the site that are currently covered by mesic thicket / low forest. This is confirmation that the upland parts of the site, where they are vegetated, only contain secondary vegetation. The on-site assessments show that these areas are currently heavily invaded, or contain thicket patches, but it can be seen that these are secondary in nature (Hoare 2024). However, it must be noted that the definition of natural vegetation, according to the National Environmental Management Act, 1998 (Act No. 107 of 1998) is "*vegetation consisting of indigenous plant species occurring naturally in an area, regardless of the level of alien infestation and where the topsoil has not been lawfully disturbed during the preceding 10 years.*" According to this description, the vegetation on site (including secondary vegetation) is legally in a natural state.





**Figure 17: Aerial photograph from 1936 showing cultivation in upper two-thirds of the site.**

The powerline fragments the CBA on the property, effectively cutting off the proposed main house. It should be taken into consideration that the powerline servitude is maintained by brushcutting 11m either side of the line. The CBA within the property will be managed for Alien Invasive Plants in accordance with the approved Alien Clearing Plan (Appendix L). This is in line with the objects of the Biodiversity Spatial Plan for CBA's in that degraded areas are rehabilitated or restored to near-natural state. More than 13,000m<sup>2</sup> of the heavily infested areas on the property will be left to return to near-natural state, with alien vegetation management and monitoring in place.

Only approximately 400m<sup>2</sup> of CBA will be disturbed for the main dwelling and a section of the swimming pool. It should also be taken into consideration that much of the site was previously disturbed, and that rehabilitation effort such as invasive alien vegetation removal and restoration of natural vegetation alongside a low impact development be considered as consistent with the objectives and management guidelines of the Biodiversity Spatial Plan.

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.
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No development is proposed in the natural vegetation identified as mesic thicket (figure 14).

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.
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N/A

4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.
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***This section is taken from the Plant, Animal and Terrestrial Biodiversity Assessment by Dr. David Hoare.***

According to the National Web-Based Environmental Screening Tool, a small number of animal species have been flagged as of concern for the current project. These are all species that require specific habitat conditions to inhabit the site.

The site is considered to be potential habitat for any of four of the animal species flagged for the site. The woodland habitats (mesic thicket/forest) is likely habitat for three animal species, the Knysna Warbler (Vulnerable), a small antelope (Vulnerable), and Duthie's Golden Mole (Vulnerable). A small, man-made pond on site is potential habitat for the Knysna Leaf-folding Frog (Endangered). It is therefore verified that the Animal Species Theme has MEDIUM sensitivity for the site.

- The Knysna Warbler (Vulnerable) has been recorded numerous times in Wilderness, which is the core area for the distribution of the species in the Garden Route. The site has highly suitable habitat for this species. There is therefore a high probability of the species occurring in thicket areas on site.
- The forests on site may constitute part of the general foraging range of Crowned Eagle (Near Threatened), but it is unlikely that they occur on site, or are dependent on it.
- A small man-made pond at the northern corner of the site is potentially suitable habitat for the Knysna Leaf-folding Frog (Endangered).
- The site has potentially suitable habitat for Duthie's Golden Mole (Vulnerable). There is therefore a possibility of the species occurring in mesic thicket areas on site.
- There is a moderate to high probability of the small antelope (Vulnerable) occurring in the forests on site. If not resident, it is very likely to migrate through the site.

## 5. Geographical Aspects

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

The proposed development site is located on a steep west-facing slope. Two prominent ridgelines are located towards the west and the east of the property. The average height above sea level varies between 64 – 110 meters. Sections of the property that are steeper than 1:4 will primarily be avoided.

The position of the main dwelling and studio unit are shown as being within a sloped area of approximately 31-35% according to figure 18. The primary dwelling was positioned in the northern section of the property on a suitable slope close to the entrance from Whites Road, above the powerline in an area covered with Black Wattles. Due to the topography difference between Whites Road and the property, the access point is also important. All these aspects were considered in the position proposed not only for the primary dwelling house and outbuilding but also for the tourist accommodation units and related structures.

According to the ground slope stability assessed in the geotechnical report, no unstable geological materials that can move either gradually (creep) or suddenly as a slump or a slide are visually present. The side walls were stable and there were no signs of piping (erosion) visible on site (Appendix G2).

The design of the road will take into consideration the limitations of constructing on slopes and incorporate engineering designs as approved by the Provincial Roads Department. The slope of embankments and cut-outs will be stabilised by suitable concrete retainer wall blocks. The house design will also take into consideration building challenges and will be constructed on stilts using lightweight construction materials (figure 19).

The house and studio will be a light steel frame construction in order to ensure minimum impact created by the footprint. The garage and relevant floor structure is separate from the main dwelling and the only portion of the building to be constructed on a concrete slab. The garage building slab is positioned on a suitably sloped portion of the property avoiding steep areas (figure 20). The natural contours on the property presents various challenges with regards to the design and relevant

environmental impact but the fact that the main dwelling “floats” above the natural contours on columns ensures a well-considered and sensitive approach.

The three tourist accommodations will follow the tiny home concept and will be constructed on top of wooden platform on timber poles. The tiny homes will be a light steel frame construction (figure 21).

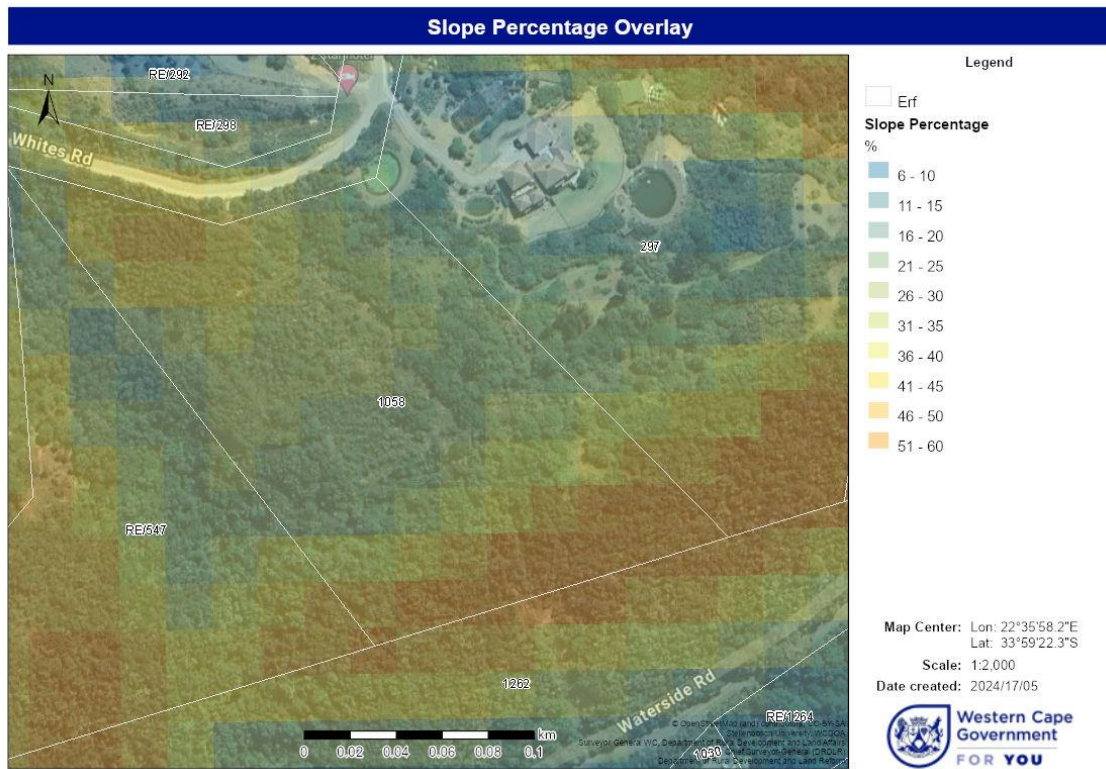


Figure 18: Slope percentage.



Figure 19: 3D generated concept plan of main dwelling.





**Figure 20: 3D generated concept plan of office studio.**



**Figure 21: 3D generated concept plan of tourist accommodation.**

## 6. Heritage Resources

6.1.	Was a specialist study conducted?	<b>YES✓</b>	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
Heritage Statement in support of Heritage Western Cape Notification of Intent to Develop (HWC NID – Section 38[8]): Proposed Development on Erf 1058, Hoekwil, Wilderness, Western Cape Province. Dr. Peter Nilssen 18 July 2023			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
According to the SAHRIS Paleo Sensitivity Map the palaeontological sensitivity of Erf 1058 is low and no palaeontological studies are required.			
The proposed development footprint on Erf 1058 has been impacted by farming activities (ploughing, cultivation, and possible grazing) during the colonial period. As a result, the context of pre-colonial heritage resources in surface sediments was damaged, disturbed or destroyed. No colonial period heritage resources were identified on record or on the property.			

Even though none were identified, if present on the property, then isolated Stone Age pieces are considered to be of low heritage value and are Not Conservation Worthy.

Due to the absence of significant heritage resources, the proposed activity will have negligible to no cumulative impacts on the archaeological or heritage value of the area.

This baseline investigation has shown that, if present, heritage resources on the affected part of the property would be of low significance and given a field rating of Not Conservation Worthy. Since there are no significant heritage resources associated with the proposed development footprint, it does not meaningfully contribute to the cultural landscape of the area.

For reasons given above and on heritage grounds, the proposed activity will have negligible to no negative impact on the scenic route (N2) or aesthetic value of the area. A Visual Impact Assessment is being done in terms of NEMA but is not warranted in terms of the NHRA.

The positive socio-economic impact, including some short-, medium- and long-term jobs as well as the provision of accommodation for the tourism industry outweigh the negligible to zero negative impacts this project may have on heritage resources.

Because of the above, and because there is no reason to believe that significant heritage resources will be impacted by the proposed development on Erf 1058, it is recommended that no further heritage-related specialist studies (as listed in the NID - HWC Case No.: HWC23083106) are required and that a Heritage Impact Assessment is not warranted for the project.

Nevertheless, it is recommended that Heritage Western Cape consider and/or require that the following be included in the Environmental Authorisation / Environmental Management Program, if the project is approved:

- ❖ if any human remains or significant archaeological materials are exposed during mining activities, then the find should be protected from further disturbance and work in the immediate area should be halted and Heritage Western Cape must be notified immediately. These heritage resources are protected by Section 36(3)(a) and Section 35(4) of the NHRA (Act 25 of 1999) respectively and may not be damaged or disturbed in any way without a permit from the heritage authorities. Any work in mitigation, if deemed appropriate, should be commissioned and completed before construction continues in the affected area and will be at the expense of the developer.

A NID was submitted to Heritage Western Cape by Dr. Peter Nilssen. The final letter from HWC dated 13 September 2023 stated the following (Appendix E1):

*You are hereby notified that, since there is no reason to believe that the proposed low density residential - tourism development on Erf 1058, Whites Road, Hoekwil, Wilderness, will impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required.*

## 7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.

No culturally or historically significant elements will be affected, as described above

## 8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.
<p>Erf 1058 Hoekwil is located in Wilderness Heights, a small holding area of the greater Wilderness. The GMSDF refers to the Wilderness – Lakes – Hoekwil Local Spatial Development Framework (WLH LSDF) (2015) in which study area the subject property is located. The function of small holdings as a settlement type is described as low-density rural living, with an agricultural component with reference in the relevant LSDF. Wilderness Heights is one such small holding area.</p> <p>The GMSDF also describes the area of the Wilderness-Lakes-Hoekwil LSDF as follows:  “Wilderness, Touwsrante, and Hoekwil Wilderness is one of the most popular tourism and residential destinations along the Garden Route, based on its unique terrestrial, aquatic and marine assets, outstanding rural and townscape qualities, and recreational amenity value. Threats to the area include the subdivision of smallholdings, expansion of poorly located and serviced informal areas, and insensitive building development.”</p>	
8.2.	Explain the socio-economic value/contribution of the proposed development.
<p>Tourism and recreation are ways to achieve economic growth and adds to the sense of place of the greater George municipal area as the gateway to the Garden Route. The GMSDF states that tourism accommodation and uses in varying formats in the urban and rural environments is a generally accepted principle.</p>	
8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.
<p>The visitors to this property will support economic opportunities created in the nodes and precincts, e.g. restaurants and recreational facilities in the Wilderness area. The proposal will have socio-economic benefits in maintaining the natural environment and creating employment opportunities for the local communities.</p>	
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.
<p>The GMSDF states that Open Space Zone III is encouraged in CBA/ESA areas and where steep slopes are found. Erf 1058 Hoekwil is also located abutting the Wilderness Lakes Protected Area of the Garden Route National Park. A property also bordering onto Erf 1058 Hoekwil was recently rezoned to Open Space Zone III. Properties surrounding the Garden Route National Park are slowly reflecting the character of the area and the importance of its location. Through appropriate management the natural environment of this property is being restored.</p> <p>As Erf 1058 Hoekwil is not located on a ridge, the development can be 'hidden' in the surrounding natural vegetation. Visual impact is mitigated due to its location, building style and exterior finishes that will blend in the area. Sections of the property are steeper than 1:4 but primarily avoided.</p>	

**SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES**

**1. Details of the alternatives identified and considered**

1.1.	Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred property and site alternative.	
The preferred site is Erf 1058 Hoekwil, located in Wilderness Heights in the George Municipal area.	
Provide a description of any other property and site alternatives investigated.	
There are no other site alternatives available to the Applicant.	
Provide a motivation for the preferred property and site alternative including the outcome of the site selectin matrix.	
N/A	
Provide a full description of the process followed to reach the preferred alternative within the site.	
<p>The vision of the Applicant is to create three accommodation units (tiny home concept) that give a sense of remoteness for the prospective guests. The owner will live on the property and maintain the property with income generated from the holiday units. The Applicant wishes to restore vegetation to near-natural state and has already undertaken alien vegetation removal in an effort to achieve this. Rezoning to Open Space Zone III (nature conservation area) with consent use for tourist accommodation was therefore the best option to achieve this outcome.</p> <p>The focus is on nature conservation and not resort development. The 3 tourist accommodation units can be regarded as ancillary to the primary dwelling and conservation outcome proposed for the property. A conservation outcome is not a free exercise and needs to be funded.</p> <p>the primary dwelling is positioned in the northern section of the property on a suitable slope close to the entrance from Whites Road, above the powerline in an area covered with Black Wattles. This position is further than 32m from the watercourse just outside the property boundary to the west. If the dwelling house is positioned elsewhere more indigenous vegetation would be impacted, whereas mostly only black wattles need to be removed. Due to the topography difference between Whites Road and the property, the access point is also important. All these aspects were considered in the position proposed not only for the primary dwelling house and outbuilding but also for the tourist accommodation units and related structures.</p> <p>The site development plan was updated to indicate the 36m buffer from the watercourse located just west of the subject property and the CBA area was overlayed to inform the SDP. Position of structures had to consider least impact on vegetation by utilising sections of alien invested area and existing clearing where there is also a suitable slope. It is not advisable to construct structures on the steepest section of the property and also too close to the powerline.</p> <p>Alternative C included a lapa and greenhouse. Following the Pre-Application PPP these structures were removed to reduce impact on vegetation. Alternative B included a smaller footprint and no encroachment into the mesic thicket to the south.</p> <p>After further investigation and using mapping from the Terrestrial Biodiversity Assessment (Hoare 2024) two existing clearings were identified and the accommodation units positioned accordingly. Two of the three tourist accommodation units in the dense secondary thicket, is proposed in natural clearings, with a suitable slope and away from the powerline. The third tourist accommodation unit is southwest of the powerline on a suitable slope. There are no other clearings on a suitable slope where the units could be accommodated. Alternative A was therefore considered the preferred layout.</p>	

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

In the consideration of alternative land, the principles of sustainable development should be practicable, feasible, reasonable, and viable. As the Applicant does not own any alternative properties in the area suitable for the proposed development, it is not feasible to consider another property as an alternative.

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

There is only one site/property. Alternatives within this property were investigated.

Positives	Negatives
<ul style="list-style-type: none"> <li>- There are no aquatic features at risk on site. The site of the development is positioned to avoid drainage lines.</li> <li>- The proposed development has been located to be as close as possible to the margin of the CBA and outside of the highly sensitive mesic thicket area to avoid any fragmentation.</li> <li>- Management of the property as an Open Space III zone will promote conservation outcomes. Sustainable rehabilitation and restoration of indigenous vegetation supported by tourism income.</li> <li>- Alien vegetation clearing as per NEMBA.</li> <li>- The development will provide jobs to the unskilled and semi-skilled market in terms of construction jobs.</li> <li>- injection of income flow into the economy for the construction phase.</li> <li>- Injection of income flow into the economy for the operational phase by creating job opportunities.</li> <li>- Only 6.4% coverage of the property will be disturbed, the remainder of the property will remain natural or be restored to near-natural.</li> <li>- Development will reduce vagrants on property and fire risks.</li> </ul>	<ul style="list-style-type: none"> <li>- Disturbance of vegetation on the margin of the CBA area.</li> <li>- Loss of habitat and possible fragmentation in the secondary vegetation.</li> <li>- Disturbance of fauna due to tourist accommodation units close to the mesic thicket. The small size of the accommodation units should reduce this impact.</li> <li>- Potential erosion in steep areas. Storm water management must be a priority.</li> <li>- Noise pollution during construction phase.</li> <li>- Solid waste impact.</li> <li>- Increased resource usage such as water.</li> </ul>

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

Provide a description of the preferred activity alternative.

Single residential dwelling, office studio, and operation of three tourist accommodation units. Management of the property as Open Space III zone.

Provide a description of any other activity alternatives investigated.

No activity alternatives have been investigated for this development.

Provide a motivation for the preferred activity alternative.

N/A

Provide a detailed motivation if no activity alternatives exist.

The activity as presented offers the best option from a socio-economic and environmental perspective, as well as best use of the land for achieving a positive conservation outcome through the restoration of previously degraded areas and limiting encroachment into undisturbed areas. It is also supported by the specialists appointed in the field of expertise pertaining to the environment.

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

There is only one activity proposed for the property that was investigated.

Positives	Negatives
<ul style="list-style-type: none"> <li>- There are no aquatic features at risk on site. The site of the development is positioned to avoid drainage lines.</li> <li>- The proposed development has been located to be as close as possible to the margin of the CBA and outside of the highly sensitive mesic thicket area to avoid any fragmentation.</li> <li>- Management of the property as an Open Space III zone will promote conservation outcomes. Sustainable rehabilitation and restoration of indigenous vegetation supported by tourism income.</li> <li>- Alien vegetation clearing as per NEMBA.</li> <li>- The development will provide jobs to the unskilled and semi-skilled market in terms of construction jobs.</li> <li>- injection of income flow into the economy for the construction phase.</li> <li>- Injection of income flow into the economy for the operational phase by creating job opportunities.</li> <li>- Only 6.4% coverage of the property will be disturbed, the remainder of the property will remain natural or be restored to near-natural.</li> <li>- Development will reduce vagrants on property and fire risks.</li> </ul>	<ul style="list-style-type: none"> <li>- Disturbance of vegetation on the margin of the CBA area.</li> <li>- Loss of habitat and possible fragmentation in the secondary vegetation.</li> <li>- Disturbance of fauna due to tourist accommodation units close to the mesic thicket. The small size of the accommodation units should reduce this impact.</li> <li>- Potential erosion in steep areas. Storm water management must be a priority.</li> <li>- Noise pollution during construction phase.</li> <li>- Solid waste impact.</li> <li>- Increased resource usage such as water.</li> </ul>

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.

**Alternative A Layout (preferred):**

The proposed development will consist of 730m<sup>2</sup> of building structures (houses, accommodation units, etc), and 1051m<sup>2</sup> of landscaped areas (roads, parking, pool, deck areas, etc). The following is proposed on Erf 1058:

- Main residential dwelling for the property owner (280m<sup>2</sup>).
- Outbuilding with homer office, garage, and storage space (170m<sup>2</sup>).
- Kitchen Yards(35m<sup>2</sup>).
- Driveway and parking for main dwelling (291m<sup>2</sup>).
- Three tourist accommodation units of 80m<sup>2</sup> each (240m<sup>2</sup>).
- Three jacuzzi decks for tourist accommodation units of 16m<sup>2</sup> each (48m<sup>2</sup>).
- Sauna House (40m<sup>2</sup>).
- Natural outdoor pool (240m<sup>2</sup>).
- Access to tourist accommodation and facilities (270m<sup>2</sup>).
- Parking for tourist accommodation and facilities (72m<sup>2</sup>).
- Footpaths (95m<sup>2</sup>).



Alternative A makes the best use of existing open areas by positioning the units where vegetation clearance will be minimised. Unit 3 is positioned outside of the mesic vegetation identified as having a high sensitivity. The clearings utilised for unit 2 and 3 are shown in figure 23.

As per the Plant, Animal and Terrestrial Biodiversity Assessment (Hoare 2024), it would be ecologically desirable to (as much as possible) cluster development in nodes within previously disturbed areas and close to existing disturbance (e.g. major roads). Where development is proposed further from the main road, this should be located within existing open areas in the secondary thicket. This mitigation has been addressed as far as possible such that:

- ❖ the main dwelling and office studio form a cluster node and are located close to Whites Road.
- ❖ the existing track is utilized for the service road.
- ❖ Unit one, the shaded parking and sauna house are clustered as a node.
- ❖ Unit 2 and 3 are located within existing open areas in the secondary thicket (open secondary thicket).

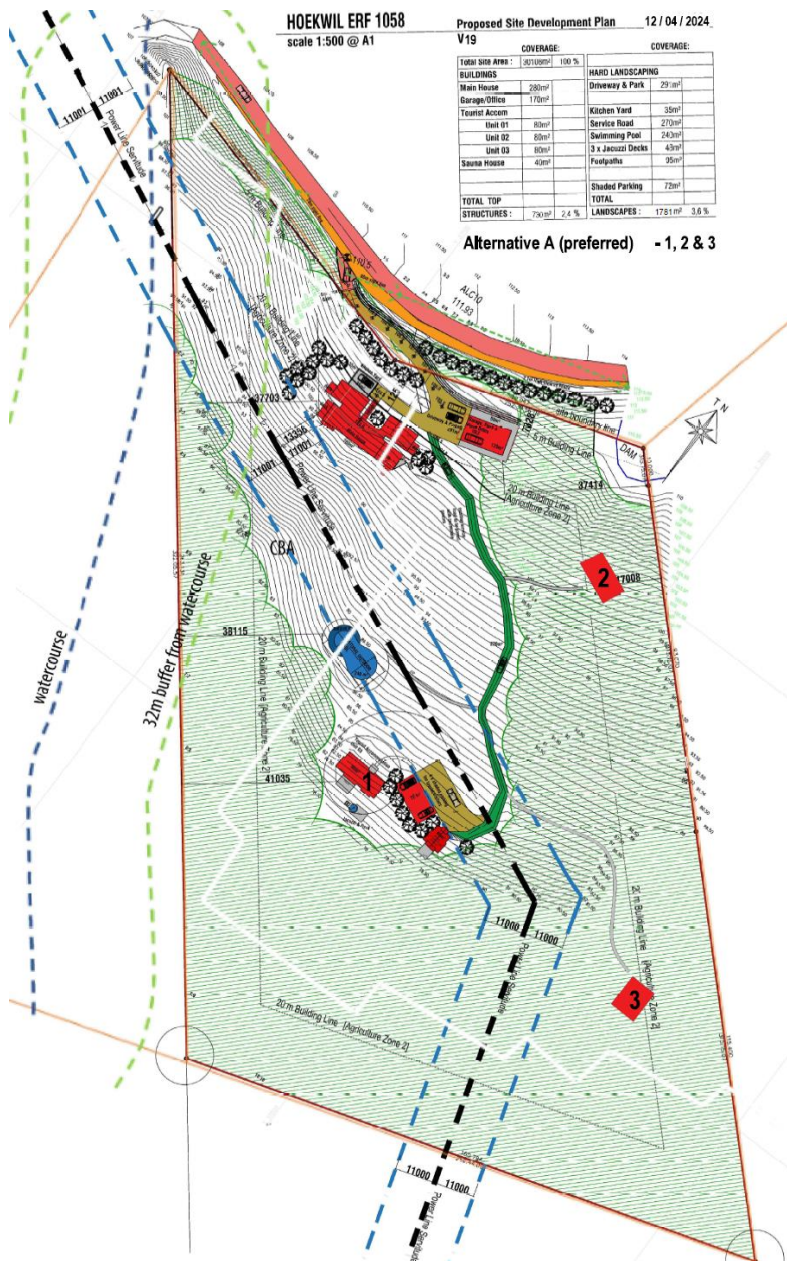
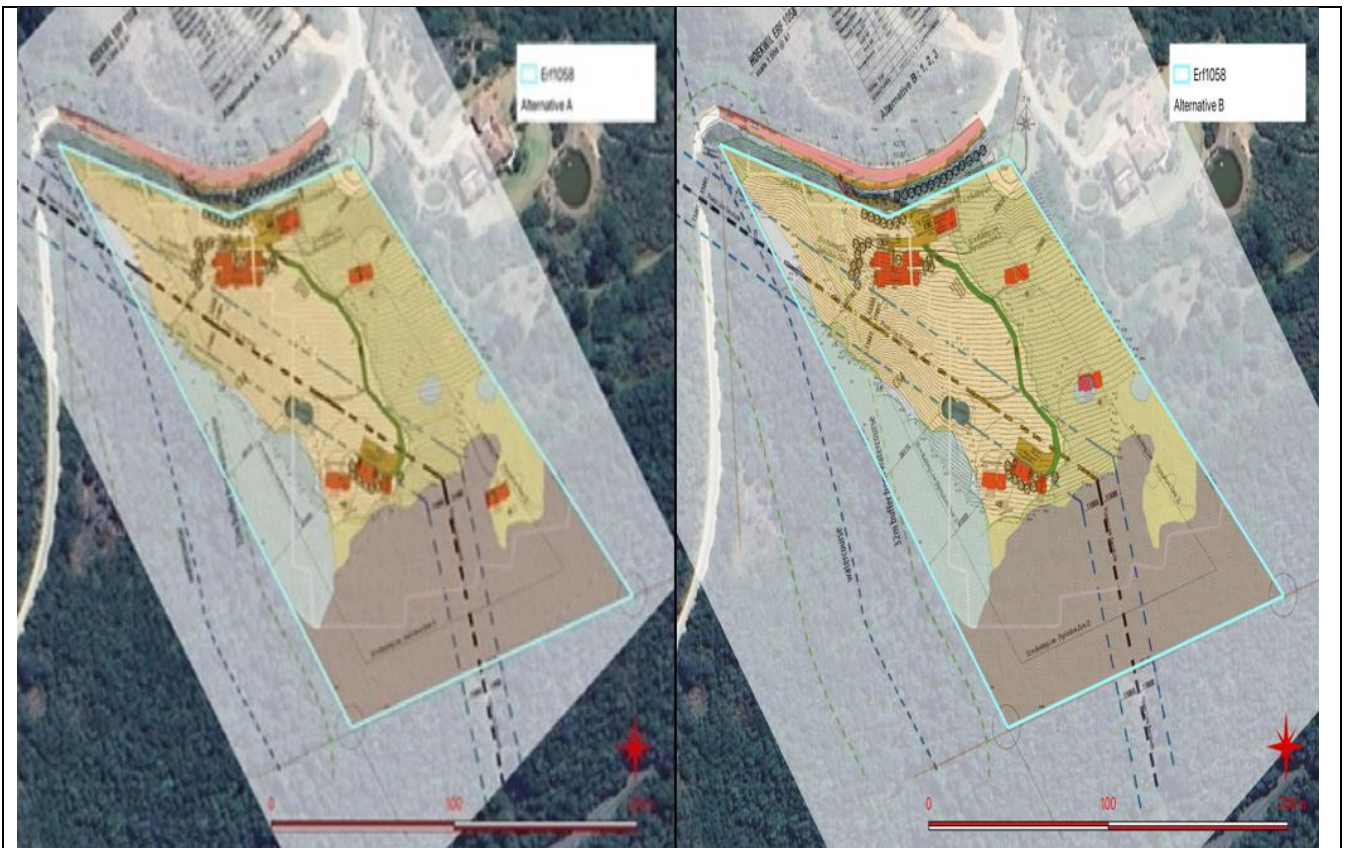


Figure 22: Proposed Site Development Plan (Alternative A – preferred).



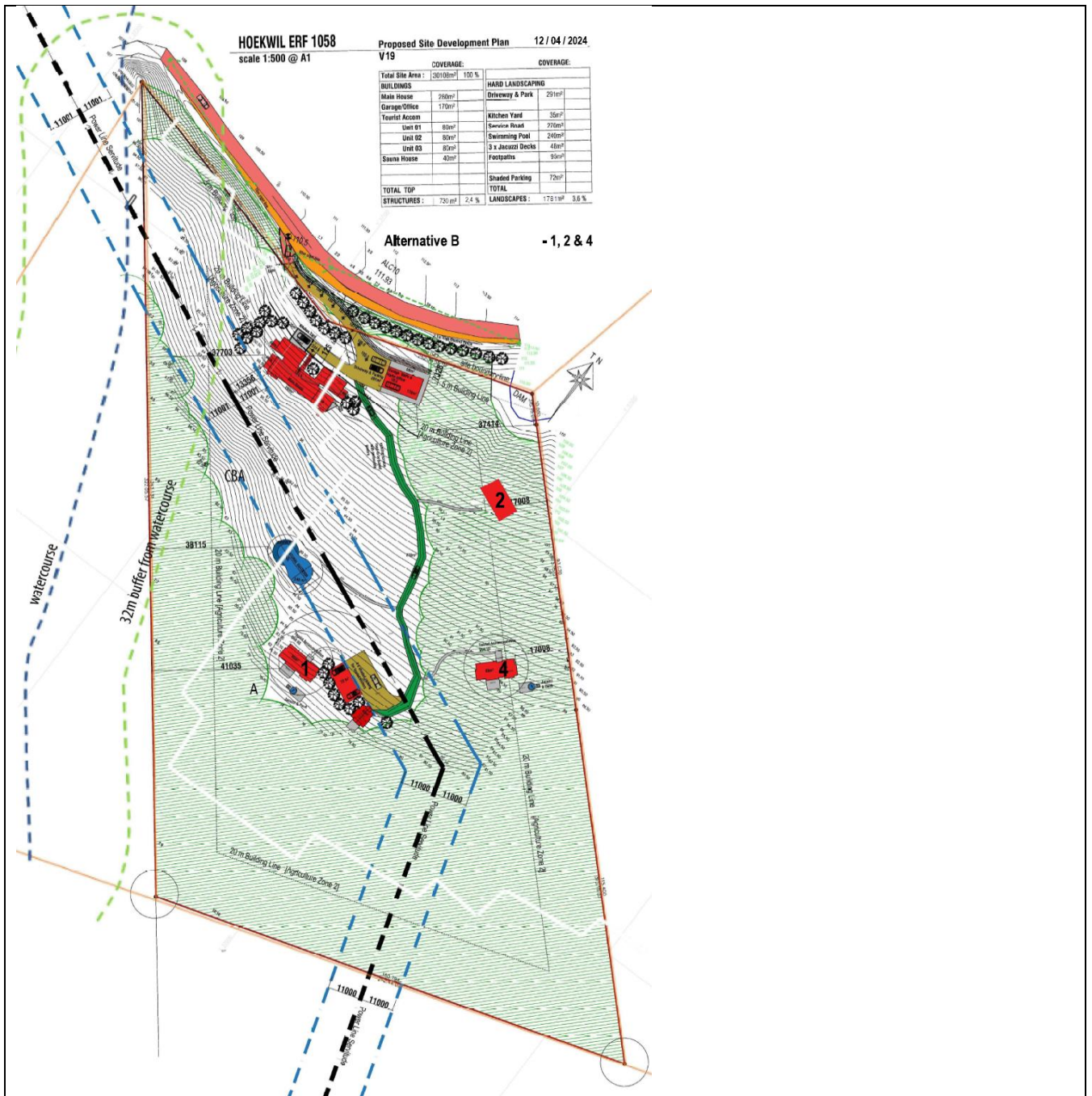
**Figure 23: Alternative A (Preferred Layout) and Alternative B overlaid with habitat mapping (taken from the Plant, Animal and Terrestrial Biodiversity Assessment).**

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

**Alternative B Layout:**

The Alternative B layout maintains the same position and footprint size for infrastructure as in the preferred layout (Alternative A), however one of the tourist accommodations (unit 4) is positioned closer to the primary dwelling at Whites Road, as shown in figure 24 below. This layout does not make optimal use of existing open areas for unit 4, which will result in more vegetation disturbance than for Alternative A, and loss of dense secondary thicket. It is therefore not the preferred alternative.





**Figure 24: Proposed Site Development Plan (Alternative B).**

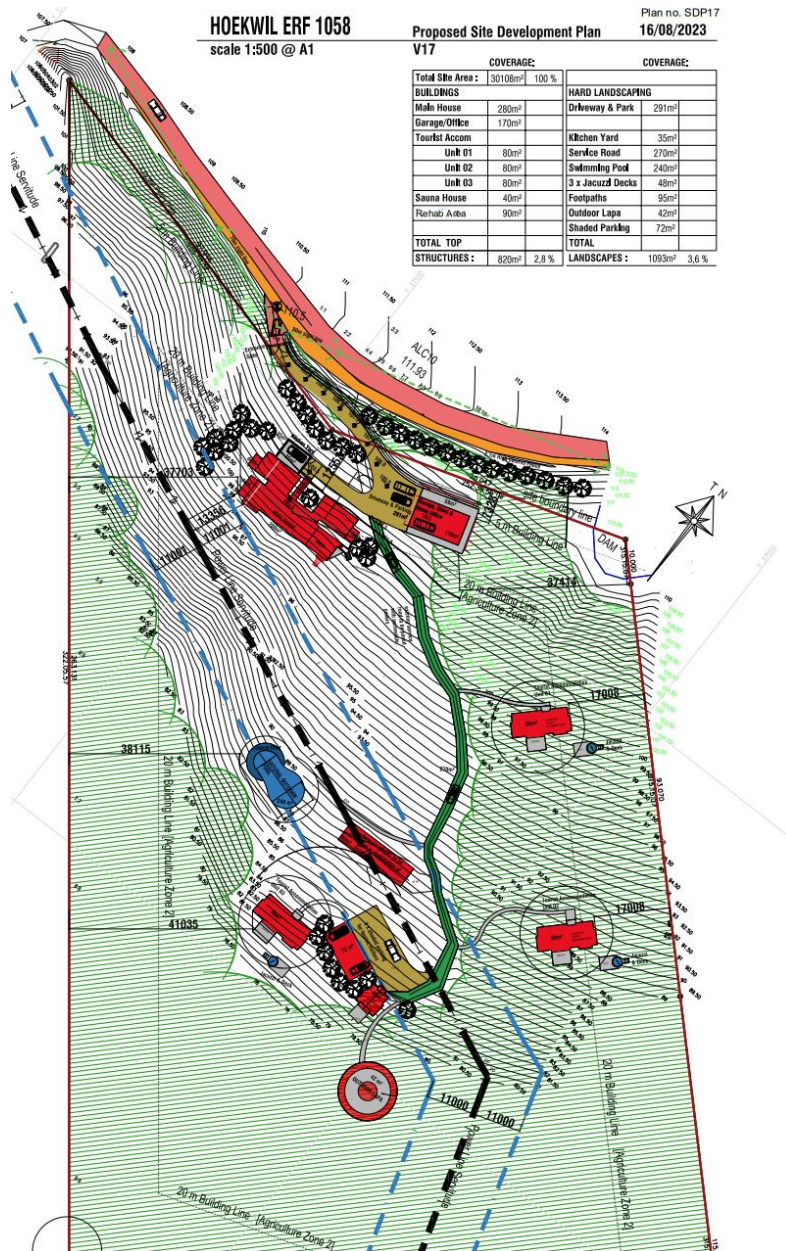
**Alternative C Layout:**

The proposed development will consist of 830m<sup>2</sup> of building structures (houses, accommodation units, etc), and 1093m<sup>2</sup> of landscaped areas (roads, parking, pool, deck areas, etc). The total disturbance area will be 1923m<sup>2</sup>.

The following is proposed for Alternative C Layout on Erf 1058:

- ❖ Main residential dwelling for the property owner (280m<sup>2</sup>).
- ❖ Outbuilding with homer office, garage, and storage space (170m<sup>2</sup>).
- ❖ Kitchen Yards(35m<sup>2</sup>).
- ❖ Driveway and parking for main dwelling (291m<sup>2</sup>).
- ❖ Three tourist accommodation units of 80m<sup>2</sup> each (240m<sup>2</sup>).
- ❖ Three jacuzzi decks for tourist accommodation units of 16m<sup>2</sup> each (48m<sup>2</sup>).

- ❖ Outdoor Lapa (42m<sup>2</sup>).
- ❖ Sauna House (40m<sup>2</sup>).
- ❖ Natural outdoor pool (240m<sup>2</sup>).
- ❖ Access to tourist accommodation and facilities (270m<sup>2</sup>).
- ❖ Parking for tourist accommodation and facilities (72m<sup>2</sup>).
- ❖ Footpaths (95m<sup>2</sup>).
- ❖ Green House (90m<sup>2</sup>).



**Figure 25: Proposed Site Development Plan (Alternative C)**

This alternative layout will result in a larger disturbance area and loss of vegetation, and encroachment into the highly sensitive mesic thicket due to the lapa. It is therefore not the preferred alternative.

### **Clustered Layout:**

Clustered Alternative Layout does not make optimal use of existing open areas / clearings and open secondary thicket. A large portion of dense secondary thicket would be disturbed to allow for a clustered layout to the northeast of the property. Development above/north of the yellow line as shown



in figure 26 below, shows that the majority of the development will be concentrated in the open and dense secondary thicket. This alternative will result in the loss of dense secondary thicket.

The tourist accommodation cannot be clustered in the north as the northern slopes are steeper than where the tourist accommodation is currently proposed. The position of the electrical servitude running through the property also has an impact on position of structures. Furthermore, the owners wish to create a sense of remoteness for the prospective guests and clustering. Therefore, this layout also does not consider the objectives of the development that aims to provide secluded and private tourism units that contribute to the experience of being within nature. The layout will also impact on the permanent residential dwelling and privacy thereof. It is therefore not the preferred alternative.



**Figure 26: Habitats on site with yellow line indicated the area proposed for a clustered layout.**

### **No-Go Alternative:**

The No-go option is the option of not undertaking the proposed project or alternatives. If the proposed security estate is not developed the following will occur:

1. The site will remain as is and continue to support what remaining fauna and flora make use of the area.
2. There will be no further impacts on landscape connectivity.
3. The landowner will not be able to undertake his right to develop his property.
4. The potential socio-economic benefits to the town and communities will be lost.
5. The potential for job creation and skills development will be lost.

Alien plant infestations should not be used as a reason to develop an area, but it undeniably reduces the quality of natural habitat for the ubiquitous wildlife that persists in it. With the continued spread and maturity of the alien trees, natural habitats will become even less likely to provide effective linkages for animal movement.

The potential conservation outcome through alien vegetation control, rehabilitation of land, restoration of indigenous vegetation, and possible stewardship agreements of operating a small-scale tourism development will be lost. Continued alien vegetation removal cannot be sustainably funded by the landowner without income generated from the property. There will also be very little benefit for the landowner, the community, or the municipality if the land remained undeveloped.



Provide a motivation for the preferred design or layout alternative.

The development proposal is guided by the topography, vegetation of the property and the owner's need to create accommodation that offers guests the feeling of remoteness in nature. An important objective of the site layout is that it uses existing previously disturbed areas on the property for the proposed structures, while also providing privacy for visitors. The proposed site layout therefore provides the best fit into the landscape that is also considerate of environmental features.

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

N/A

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

Alternative A Layout (preferred):	
Positives	Negatives
<ul style="list-style-type: none"> <li>- The proposed development has been located outside of the CBA as far as possible with only the main dwelling being within the margin of the CBA.</li> <li>- The proposed development is located outside of the highly sensitive mesic thicket area to avoid fragmentation in this habitat.</li> <li>- The proposed development is located outside of the dense secondary thicket habitat.</li> <li>- Optimal use of existing clearings and the open secondary thicket habitat.</li> <li>- Spreading out accommodation units can reduce the intensity of environmental impacts in any one location, potentially minimizing localized degradation.</li> <li>- With units spread out, the development can be more easily integrated into the natural landscape, maintaining scenic values and visual appeal.</li> <li>- Spaced units can offer guests a greater sense of privacy and a more immersive natural experience, which may lead to increased awareness and appreciation of the environment.</li> <li>- Management of the property as an Open Space III zone will promote conservation outcomes. Sustainable rehabilitation and restoration of indigenous vegetation supported by tourism income.</li> <li>- Alien vegetation clearing as per NEMBA.</li> <li>- The development will provide jobs to the unskilled and semi-skilled market in terms of construction jobs.</li> <li>- injection of income flow into the economy for the construction phase.</li> </ul>	<ul style="list-style-type: none"> <li>- Disturbance of vegetation on the margin of the CBA area.</li> <li>- Loss of habitat and possible fragmentation in the secondary vegetation.</li> <li>- Intrudes slightly into the margin of the mesic thicket.</li> <li>- Disturbance of fauna due to tourist accommodation units close to the mesic thicket. The small size of the accommodation units should reduce this impact.</li> <li>- Spacing the units can fragment habitats and disrupt wildlife corridors affecting biodiversity and ecosystem functions.</li> <li>- Potential erosion in steep areas. Storm water management must be a priority.</li> <li>- Noise pollution during construction phase.</li> <li>- Solid waste impact.</li> <li>- Increased resource usage such as water.</li> </ul>

<ul style="list-style-type: none"> <li>- Injection of income flow into the economy for the operational phase by creating job opportunities.</li> <li>- Only 6.4% coverage of the property will be disturbed, the remainder of the property will remain natural or be restored to near-natural.</li> <li>- Development will reduce vagrants on property and fire risks.</li> </ul>	
<b>Alternative B Layout</b>	
<b>Positives</b>	<b>Negatives</b>
<ul style="list-style-type: none"> <li>- The proposed development has been located outside of the CBA as far as possible with only the main dwelling being within the margin of the CBA.</li> <li>- The proposed development is located outside of the highly sensitive mesic thicket area to avoid fragmentation in this habitat.</li> <li>- Use of existing clearings and the open secondary thicket habitat.</li> <li>- Spreading out accommodation units can reduce the intensity of environmental impacts in any one location, potentially minimizing localized degradation.</li> <li>- With units spread out, the development can be more easily integrated into the natural landscape, maintaining scenic values and visual appeal.</li> <li>- Spaced units can offer guests a greater sense of privacy and a more immersive natural experience, which may lead to increased awareness and appreciation of the environment.</li> <li>- Management of the property as an Open Space III zone will promote conservation outcomes. Sustainable rehabilitation and restoration of indigenous vegetation supported by tourism income.</li> <li>- Alien vegetation clearing as per NEMBA.</li> <li>- The development will provide jobs to the unskilled and semi-skilled market in terms of construction jobs.</li> <li>- injection of income flow into the economy for the construction phase.</li> <li>- Injection of income flow into the economy for the operational phase by creating job opportunities.</li> <li>- Only 6.4% coverage of the property will be disturbed, the remainder of the property will remain natural or be restored to near-natural.</li> <li>- Development will reduce vagrants on property and fire risks.</li> </ul>	<ul style="list-style-type: none"> <li>- Disturbance of vegetation on the margin of the CBA area.</li> <li>- Loss of habitat and possible fragmentation in the secondary vegetation.</li> <li>- Disturbance of fauna due to tourist accommodation units close to the mesic thicket. The small size of the accommodation units should reduce this impact.</li> <li>- Spacing the units can fragment habitats and disrupt wildlife corridors affecting biodiversity and ecosystem functions.</li> <li>- Potential erosion in steep areas. Storm water management must be a priority.</li> <li>- Noise pollution during construction phase.</li> <li>- Solid waste impact.</li> <li>- Increased resource usage such as water.</li> </ul>

<b>Alternative C Layout</b>	
<b>Positives</b>	<b>Negatives</b>
<ul style="list-style-type: none"> <li>- Management of the property as an Open Space III zone will promote conservation outcomes. Sustainable rehabilitation and restoration of indigenous vegetation supported by tourism income.</li> <li>- Alien vegetation clearing as per NEMBA.</li> <li>- The development will provide jobs to the unskilled and semi-skilled market in terms of construction jobs.</li> <li>- injection of income flow into the economy for the construction phase.</li> <li>- Injection of income flow into the economy for the operational phase by creating job opportunities.</li> <li>- Development will reduce vagrants on property and fire risks.</li> </ul>	<ul style="list-style-type: none"> <li>- Disturbance of vegetation on the margin of the CBA area.</li> <li>- The proposed development encroaches on the highly sensitive mesic thicket area.</li> <li>- Loss of habitat and possible fragmentation in the secondary vegetation.</li> <li>- Disturbance of fauna due to tourist accommodation units close to the mesic thicket. The small size of the accommodation units should reduce this impact.</li> <li>- Spacing the units can fragment habitats and disrupt wildlife corridors affecting biodiversity and ecosystem functions.</li> <li>- Potential erosion in steep areas. Storm water management must be a priority.</li> <li>- Noise pollution during construction phase.</li> <li>- Solid waste impact.</li> <li>- Increased resource usage such as water.</li> </ul>
<b>Cluster Layout</b>	
<b>Positives</b>	<b>Negatives</b>
<ul style="list-style-type: none"> <li>- Concentrating buildings in a smaller area limits the footprint of development, preserving more natural habitats and reducing disruption to wildlife.</li> <li>- Clustered layouts can lead to more efficient use of infrastructure (roads, utilities, sewage, etc.), minimizing the environmental impact associated with their construction and maintenance.</li> <li>- More contiguous open space is preserved, which can maintain ecological corridors and enhance biodiversity conservation.</li> <li>- Management of the property as an Open Space III zone will promote conservation outcomes. Sustainable rehabilitation and restoration of indigenous vegetation supported by tourism income.</li> <li>- Alien vegetation clearing as per NEMBA.</li> <li>- The development will provide jobs to the unskilled and semi-skilled market in terms of construction jobs.</li> <li>- injection of income flow into the economy for the construction phase.</li> <li>- Injection of income flow into the economy for the operational phase by creating job opportunities.</li> <li>- Development will reduce vagrants on property and fire risks.</li> </ul>	<ul style="list-style-type: none"> <li>- Loss of the dense secondary vegetation habitat.</li> <li>- Increased disturbance of vegetation by not utilising existing clearings and track.</li> <li>- Higher concentration of visitors in a smaller area may lead to localized degradation of the environment, including soil compaction, vegetation loss, and pollution.</li> <li>- Clustered developments can create a more noticeable visual impact on the landscape, potentially affecting the aesthetic value of natural areas.</li> <li>- Tourism units will not blend into the environment.</li> <li>- Privacy and the sense of being in nature for visitors will be lost due to proximity of buildings.</li> <li>- The Applicants vision and associated income for the property will be lost.</li> <li>- Disturbance of vegetation on the margin of the CBA area.</li> <li>- Potential erosion in steep areas with concentration of hardened surfaces. Storm water management must be a priority.</li> <li>- Noise pollution during construction phase.</li> <li>- Solid waste impact.</li> <li>- Increased resource usage such as water.</li> </ul>

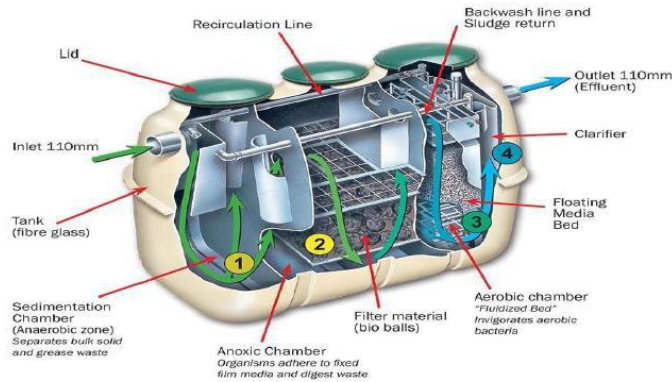
1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
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Provide a description of the preferred technology alternative:

**Alternative technology A (Preferred): Modular Package Plant**

A Fusion® wastewater treatment plant from Maskam Water, a company based in Cape Town, with a proven track record, will be used, or if not available a similar product. This solution proposed intends to avoid the following problems:

- ❖ municipal capacity constraints on emptying conservancy tanks;
- ❖ environmental risk of possible spillage from septic tanks and soakaways;
- ❖ risk of build-up of sludge and difficulty of removing it;
- ❖ aesthetic degradation of surroundings – the plant is buried;



The largest unit handles 28 persons per day and is a good fit. Two smaller units are also available, which caters for 6 and 12 persons. The units are modular, which means that additional capacity can easily be added. This also gives the owner the option to spread out capital investment in a phased approach by starting out with smaller units, to which capacity can be added.

It is also unlikely to always have 100% occupancy. Tourism average occupation is about 30%, which may cause the dilemma that if over-provisioned, there might not be sufficient effluent to nourish the microbial biome.

The package plant gives a timeous alarm whenever it needs attention or maintenance, and therefore it is expected that the effluent will consistently be of a high quality and that it can be safely diverted into a soakaway system. The units use between 60 Watt and 120 Watt, which will be supplied of the solar PV system for the property.

Provide a description of any other technology alternatives investigated.

**Alternative technology B: Soak Away / French Drain**

The primary function of the soak away tank is to allow wastewater to percolate slowly through the surrounding soil, where natural biological and chemical processes help to break down and remove pollutants before the water reaches the groundwater table.

As per the George Municipality Water and Sanitation Services By-Law, french drain, soakage pit or other similar work shall not be situated closer than 5 m to any dwelling unit or to any boundary of any premises on which it is situated, nor in any such position that will, in the opinion of the municipality, cause contamination of any borehole or other source of water which is, or may be, used for drinking purposes, or cause dampness in any building.

**Alternative technology C: Composting Toilets**

Composting toilets can be installed without connecting to a septic or sewer system, and without the need for electricity. It uses a process known as batch composting. Batch composting is a process where you collect a batch of material and then remove it from service so the material can compost without anything new being added to it. Using the batch compost method, alternating bins are used to compost the material. One bin is placed in the toilet until it becomes 3/4 full, then it is removed outside for further composting and the alternative bin is placed in the unit in order to continue its operation. Air circulation through the unit occurs due to the natural convection of air through the ventilation pipe. This is induced by the heat that is produced by the composting process, temperature differentials between the inside and outside of the structure, and by the natural chimney effect created by the vent pipe. This compost provides the nutrients for new plant growth and holds moisture in the soil<sup>3</sup>.



**Alternative technology D: Septic Tanks / Conservancy Tanks**

The proposal will allow for septic tanks or conservancy tanks as no municipal sewer connection is available in the area. However, due to the probability that the Municipal Honeysucker will not be able to service the site as a result of the steep access road it was decided that a closed sewage treatment plant will be installed.

Provide a motivation for the preferred technology alternative.

The Fusion® wastewater treatment plant will reduce the impact on the environment and natural resources by discharging quality water for reuse / infiltration back into the natural system. The modularity of the units makes it possible to grow capacity as needed, and so avoiding over-provision with its associated costs.

Provide a detailed motivation if no alternatives exist.

N/A

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

Positives	Negatives
<b>Alternative technology A (Preferred): Modular Package Plant</b>	
<ul style="list-style-type: none"> <li>- Efficiently treats wastewater reducing pollution.</li> <li>- Reuse of water for infiltration and recharge of groundwater.</li> </ul>	<ul style="list-style-type: none"> <li>- Potential contamination due to malfunctioning of unit if maintenance is not efficient.</li> </ul>

<sup>3</sup> Composting Toilets. BioLet Toilet Systems (© 2010 BioLet).



<ul style="list-style-type: none"> <li>- Less pressure on George Municipality services and George dam to provide water.</li> <li>- Installation in areas that are difficult to service.</li> </ul>	<ul style="list-style-type: none"> <li>- High initial cost and maintenance requirement.</li> </ul>
<b>Alternative technology B: Soak Away / French Drain</b>	
<ul style="list-style-type: none"> <li>- Simple low-cost solution.</li> <li>- Effective in areas with well-drained soils.</li> <li>- Minimal maintenance requirements.</li> <li>- Natural filtration to reduce contamination.</li> <li>- Affective for treating small volumes of sewage.</li> </ul>	<ul style="list-style-type: none"> <li>- Risk of groundwater contamination.</li> <li>- Not suitable for high water table areas.</li> <li>- Positioning of facility 5m away from buildings may result in disturbance of vegetation for installation.</li> </ul>
<b>Alternative technology C: Composting Toilets</b>	
<ul style="list-style-type: none"> <li>- Converts waste into useable compost.</li> <li>- Reduces water usage significantly.</li> <li>- Low environmental footprint if managed properly.</li> <li>- No need for a centralized sewage system.</li> <li>- Less pressure on George Municipality services and George dam to provide water.</li> <li>- Less pressure on solar electrical system, as no energy services are required.</li> </ul>	<ul style="list-style-type: none"> <li>- Require regular maintenance and monitoring.</li> <li>- Potential odour issue if not managed well.</li> <li>- Compost must be handles safely to avoid pathogen spread.</li> </ul>
<b>Alternative technology D: Septic Tanks / Conservancy Tanks</b>	
<ul style="list-style-type: none"> <li>- Low operating costs once installed.</li> <li>- Low risk of environmental contamination with a closed system.</li> </ul>	<ul style="list-style-type: none"> <li>- Limited access for servicing.</li> <li>- Pressure on municipal system to deal with treatment of sewage.</li> </ul>
1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred operational alternative.	
The property will operate as one permanent residential unit and 3 tourist accommodation units.	
Provide a description of any other operational alternatives investigated.	
No operational alternatives have been investigated.	
Provide a motivation for the preferred operational alternative.	
N/A	
Provide a detailed motivation if no alternatives exist.	
The activity as presented offers the best option from a socio-economic and environmental perspective, as well as best use of the land for achieving a positive conservation outcome through the restoration of previously degraded areas and limiting encroachment into undisturbed areas. It is also supported by the specialists appointed in the field of expertise pertaining to the environment.	
List the positive and negative impacts that the operational alternatives will have on the environment.	
<b>Positives</b>	<b>Negatives</b>
<ul style="list-style-type: none"> <li>- Management of the property as an Open Space III zone will promote conservation outcomes. Sustainable rehabilitation and restoration of indigenous vegetation supported by tourism income.</li> <li>- Development will reduce vagrants on the property and fire risk.</li> <li>- Alien Clearing as per NEMBA.</li> <li>- Increased revenue in the Garden Route area/tourism.</li> </ul>	<ul style="list-style-type: none"> <li>- The project was designed to minimize impact on receiving environment during operational phase.</li> <li>- Increased amount of solid waste</li> <li>- Increased use of natural resources such as water.</li> </ul>

<ul style="list-style-type: none"> <li>- Skills development.</li> <li>- Job creation.</li> </ul>	
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.	
<p>While the No-Go Alternative will in all probability result in less degradation of the receiving terrestrial ecosystem on site, it will not result in any positive socio-economic impacts associated with construction and operational phase.</p> <p>Undeveloped land will be little benefit for the landowner, the community, or the municipality. The property may pose a fire and security risk to the surrounding areas if left vacant and not maintained.</p> <p>Notwithstanding the negative impacts which could be avoided by the selection of the No-Go Alternative, this is not the preferred alternative.</p>	
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.
The following Criteria was used in formulating the Preferred Alternative (Alternative A): NEMA Act 107 of 1998 as amended Chapter 1 Section 2 Principals -	
<p><b>(4) (a) Sustainable development requires the consideration of all relevant factors including the following:</b></p>	
<p><b>(i) That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied;</b></p>	
<p>Alternative A makes the best use of existing open areas by positioning the units where vegetation clearance will be minimised. Unit 3 is positioned outside of the mesic vegetation identified as having a high sensitivity.</p>	
<p><b>(ii) that pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied;</b></p>	
<p>The preferred Alternative is to include a package plant (sewer) to mitigate the need to use municipal services and prevent pollution. The fact that ±94% of the site will remain in its natural state minimizes impacts on the receiving environment. Lifting all structures off the ground minimizes fragmentation for wildlife and thicket vegetation.</p>	
<p>Two of the tourism units have been placed in clearing to minimize impacts on vegetation. The layout avoids the CBA as far as possible and avoids loss of dense secondary thicket.</p>	
<p><b>(iii) that the disturbance of landscapes and sites that constitute the nation's cultural heritage is avoided, or where it cannot be altogether avoided, is minimised and remedied;</b></p>	
<p>As Erf 1058 Hoekwil is not located on a ridge, the development can be 'hidden' in the surrounding natural vegetation. Visual impact is mitigated due to its location, building style and exterior finishes that will blend in the area. Sections of the property are steeper than 1:4 but primarily avoided.</p>	
<p>The well positioned and designed development infrastructure allows for it to blend in very well with its surroundings and create minimal contrast in the landscape. With the effective implementation of</p>	

mitigation measures, the visual impact of the proposed development will be further reduced (Buchholz 2023).

According to the SAHRIS Paleo Sensitivity Map the palaeontological sensitivity of Erf 1058 is low and no palaeontological studies are required.

A NID was submitted to Heritage Western Cape by Dr. Peter Nilssen. The final letter from HWC dated 13 September 2023 stated the following (Appendix E1):

*You are hereby notified that, since there is no reason to believe that the proposed low density residential - tourism development on Erf 1058, Whites Road, Hoekwil, Wilderness, will impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required.*

**(iv) that waste is avoided, or where it cannot be altogether avoided, minimised and reused or recycled where possible and otherwise disposed of in a responsible manner;**

During construction and operational phase, the waste hierarchy will be followed, please refer to the EMPr.

**(v) that the use and exploitation of non-renewable natural resources is responsible and equitable, and takes into account the consequences of the depletion of the resource;**

Water: Municipal water supply will be supplemented by rainwater harvesting.

Electricity: The development will make use of solar energy by installing solar panels. It is not proposed to connect to Eskom. There are various technological aspects which may be implemented as a matter of course in order to assist with overall energy saving:

- ❖ Solar geysers and geyser thermal insulation.
- ❖ Use of gas.
- ❖ Energy efficient light bulbs.
- ❖ Natural ventilation in the buildings / structures.

Sewage: Currently there is no sewer reticulation in close proximity to the site. In light of this it is proposed that a package plant is installed to accommodate the sewerage generated on site. This solution proposed intends to avoid the following problems:

- ❖ municipal capacity constraints on emptying conservancy tanks;
- ❖ environmental risk of possible spillage from septic tanks and soakaways;
- ❖ risk of build-up of sludge and difficulty of removing it;
- ❖ aesthetic degradation of surroundings – the plant is buried;

**(vi) that the development, use and exploitation of renewable resources and the ecosystems of which they are part do not exceed the level beyond which their integrity is jeopardised;**

Approximately 94% of the property will not be disturbed therefore the integrity of the environment will also not be jeopardized. Placing the footprints in natural open spaces and clearing, and outside or on the margin of the CBA area also reduces the risk.

The use of renewable resources is as follow:

- ❖ Solar energy
- ❖ Energy efficient lights
- ❖ Rainwater tanks

**(vii) that a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions; and**

The negative impacts assessed and mitigation measures to be implemented were derived from specialist reports.

**(viii) that negative impacts on the environment and on people's environmental rights be anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied.**

The negative impacts assessed and mitigation measures to be implemented was derived from specialist reports. Public participation process are undertaken to ensure peoples environmental rights have been taken into consideration.

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

**Alternative Layout A** utilises the secondary vegetation for structures in areas that were previously disturbed by farming activities. The layout significantly reduces the area of footpaths and access roads to tourist accommodation. Alternative A makes the best use of existing open areas by positioning the units where vegetation clearance will be minimised. Unit 3 is positioned in a clearing outside of the mesic vegetation identified as having a high sensitivity.

**Alternative Layout B** does not make optimal use of existing open areas / clearings, which will result in slightly more vegetation disturbance than for Alternative A.

**Alternative Layout C** has a larger footprint. The landscape features such as footpaths and access roads are increased due to the position of the tourist accommodation units and natural outdoor pool. This layout includes an outdoor lapa and greenhouse to be used in rehabilitation efforts.

**Clustered Alternative Layout** does not make optimal use of existing open areas / clearings and open secondary thicket. A large portion of dense secondary thicket would be disturbed to allow for a crusted layout to the northeast of the property. This layout does not consider the objectives of the development that aims to provide secluded and private tourism units that contribute to the experience of being within nature. The layout will also impact on the permanent residential dwelling and privacy thereof.

Alternative Layout A (Preferred Layout) was therefore considered to align better with environmental features by utilising previously disturbed areas (farming activities) that were highly infested with invasive alien vegetation, open secondary thicket, and clearings. The overall objectives of creating a small development that fits into the landscape and that focuses on conservation outcomes through rehabilitation and restoration of habitats is achieved with Alternative A layout.

## 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).

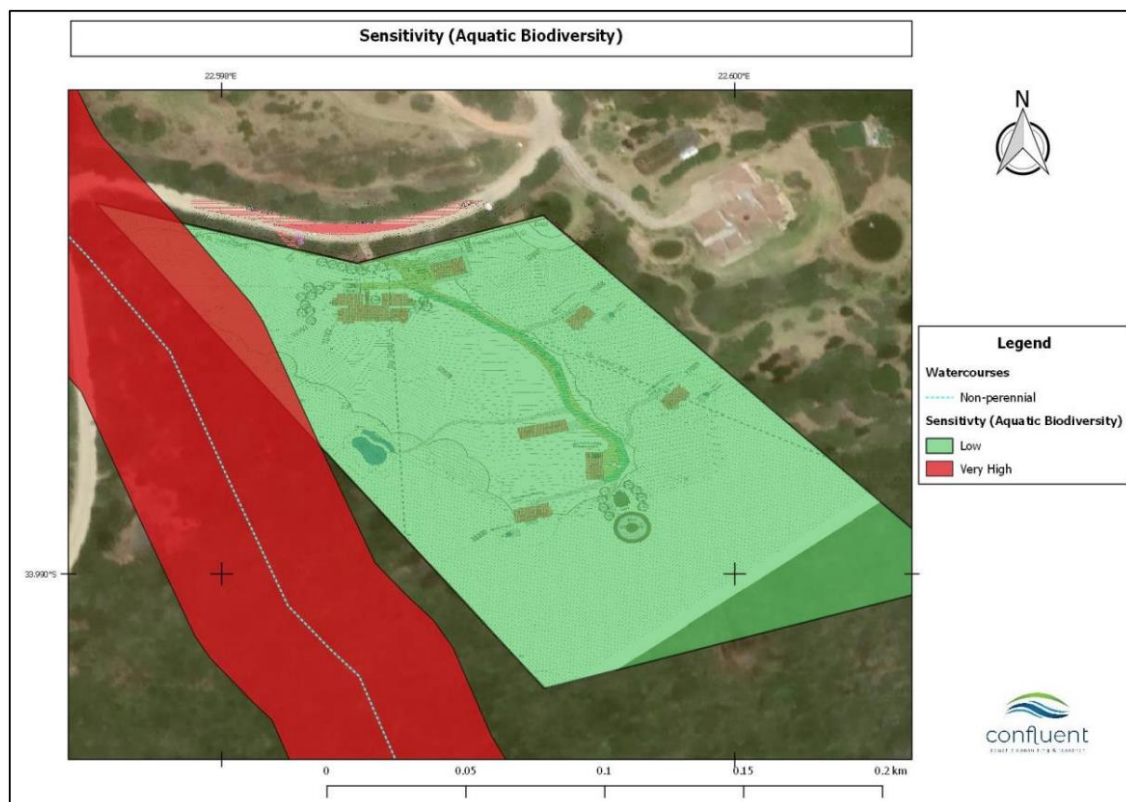
A "no-go" area as identified by the Freshwater Specialist in the Aquatic Compliance Statement by Confluent Environmental is as follows -

Buffer determination followed a conservative approach and did not consider the implementation of

mitigation measures. The buffer is therefore appropriate for a worst-case development scenario, given the catchment and buffer characteristics which are summarised as follows:

- It was assumed that some form of erosion and sediment control will be implemented on site during the construction phase.
- Mean Annual Precipitation Class: 801 – 1000 mm.
- Rainfall Intensity: Zone 4.
- The inherent runoff potential of soil in the catchment area is low (A/B soils).
- Average slope of the rivers catchment is >11 %.
- Inherent erosion potential of the catchment soils is moderate (K factor 0.5 – 0.7).
- The slope of the buffer area is moderately steep (20 - 40 %).
- Interception characteristics of the vegetation is considered to be Poor (dominated by *A. mearnsii* with poor vegetation coverage beneath trees).

Based on these inputs the buffer for drainage line is set to 36 m. Any development that occurs within the buffer would be considered to be of a Very High sensitivity, while areas outside of the buffer are considered to be of a Low sensitivity. The development footprint (all structures and hard landscaping) falls entirely within the Low sensitivity area (Figure 27).



**Figure 27: Map indicating the georeferenced development footprint in relation to aquatic biodiversity.**

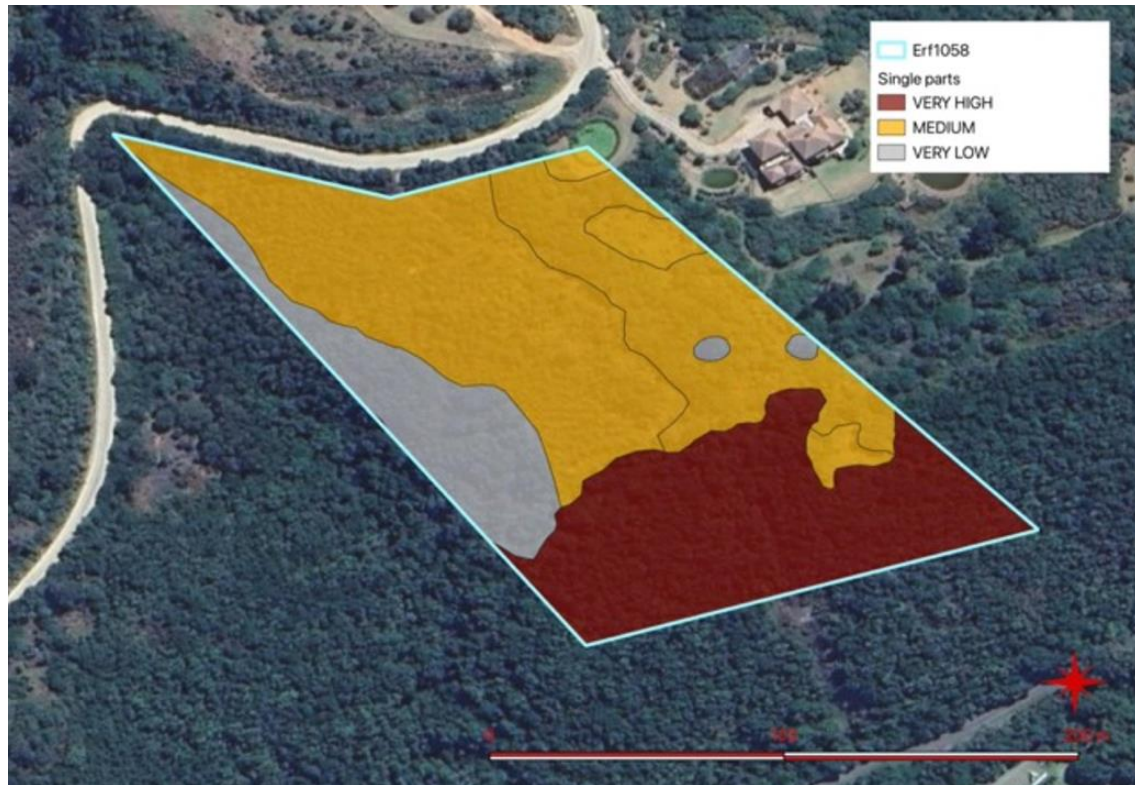
A “no-go” area as identified by the Plant, Animal and Terrestrial Biodiversity Assessment by David Hoare is as follows -

The lower one third of the site contains a band of natural mesic thicket or low forest that is in a good natural condition. There are various sensitive animal species that are likely to use the mesic thicket parts of the site, although it is not confirmed that any occur there.



Exclude development from the mesic thicket/forest at the bottom (southern side) of the site. Access to areas of VERY HIGH sensitivity during construction must not be permitted by any construction personnel (Mesic thicket). These areas must be fenced off and no access allowed.

A map of combined habitat sensitivity on site for the Terrestrial Biodiversity Theme and Animal Species Theme is provided in Figure 28, mapped according to the calculations provided through the process of calculating Site Ecological Importance (Hoare 2024).



**Figure 28: Vegetation habitat on site, Mesic Thicket (Very High) is a no-go area.**

**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.

Each potential environmental impact and risk identified was assessed according to specific criteria. These included the nature, extent, duration, consequence, probability and frequency of identified impacts, including the degree to which these impacts can be reversed, may cause irreplaceable loss of resources, and can be avoided, managed or mitigated. The criteria are based on the EIA Regulations, published by the Department of Forestry, Fisheries and the Environment (April 1998) in terms of the Environmental Conservation Act No. 73 of 1989. These criteria include:

Nature of the impact

This is an estimation of the type of effect the construction, operation and maintenance of a development would have on the affected environment. This description should include what is to be affected and how.

### Extent of the impact

Describe whether the impact will be: local extending only as far as the development site area; or limited to the site and its immediate surroundings; or will have an impact on the region or will have an impact on a national scale or across international borders.

### Duration of the impact

The specialist should indicate whether the lifespan of the impact would be short term (0-5 years), medium term (5-15 years), long term (16-30 years) or permanent.

### Intensity

The specialist should establish whether the impact is destructive or benign and should be qualified as low, medium or high. The specialist study must attempt to quantify the magnitude of the impacts and outline the rationale used.

### Probability of occurrence

The specialist should describe the probability of the impact actually occurring and should be described as improbable/unlikely (low likelihood), probable (distinct possibility), highly probable (most likely) or definite (impact will occur regardless of any prevention measures).

### Reversibility

- Completely reversible – the impact can be reversed with the implementation of minor mitigation measures.
- Partly reversible – the impact is reversible but more intense mitigation measures are required
- Barely reversible – the impact is unlikely to be reversed even with intense mitigation measures
- Irreversible – the impact is irreversible, and no mitigation measures exist

### Irreplaceable loss of resources

Describes the degree to which resources will be irreplaceably lost due to the proposed activity. It can be no loss of resources, marginal loss, significant loss or complete loss of resources.

### Cumulative effect

An effect which in itself may not be significant but may become significant if added to other existing or potential impacts that may result from activities associated with the proposed development. The cumulative effect can be:

- Negligible – the impact would result in negligible to no cumulative effect
- Low – the impact would result in insignificant cumulative effects
- Medium – the impact would result in minor cumulative effects
- High – the impact would result in significant cumulative effects

### Significance

Significance of impacts are determined through a synthesis of the assessment criteria and is described as –

- Low negative– where it would have negligible effects and would require little or no mitigation
- Low positive – the impact will have minor positive effects
- Medium negative – the impact will have moderate negative effects and will require moderate mitigation
- Medium positive – the impact will have moderate positive effects
- High negative – the impact will have significant effects and will require significant mitigation measures to achieve an accepted level of impact
- High positive – the impact will have significant positive effects

- Very high negative – the impact will have highly significant effects and are unlikely to be able to be mitigated adequately
- Very High positive – the impact will have highly significant positive effects.

#### 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.

Please see Appendix J.

## 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.
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**Aquatic Compliance Statement: Erf 1058, Wilderness, Western Cape. Dr. James M. Dabrowski of Confluent Environmental, June 2023:**

Buffer determination followed a conservative approach and did not consider the implementation of mitigation measures. The buffer is therefore appropriate for a worst-case development scenario, given the catchment and buffer characteristics. Based on these inputs the buffer for drainage line is set to 36m. Any development that occurs within the buffer would be considered to be of a Very High sensitivity, while areas outside of the buffer are considered to be of a Low sensitivity. The development footprint (all structures and hard landscaping) falls entirely within the Low sensitivity area.

While the development is located within a FEPA and SWSA, the implementation of the proposed management recommendations, together with the implementation (and maintenance) of the recommended buffer will prevent impacts to aquatic biodiversity and the ability of the land to continue to produce high quantities of good quality water. Given that the entire footprint is located outside of the watercourse and its associated buffer, the sensitivity of aquatic biodiversity on the property can be regarded as Low.

**Plant Species, Animal Species and Terrestrial Biodiversity Assessment Report for Erf 1058, Wilderness, George in the Western Cape Province. David Hoare Consulting (Pty) Ltd, 29 April 2024.**

Desktop information, field data collection and mapping from aerial imagery provides the following verifications of patterns for various themes:

1. The site consists of a combination of mesic thicket/ forest (on the steep south-facing slopes), secondary thicket, and areas of alien trees. The mesic thicket/forest, is in an ecologically natural state whereas secondary thicket occurs in areas that were ploughed approximately 90 years ago. These secondary thicket areas are therefore legally defined as being in a natural state, although they no longer contain the original vegetation that occurred there.
2. All natural areas on site occur in areas designated as Critical Biodiversity Area 1. The site occurs partially within Garden Route Granite Fynbos, which is listed as Endangered. It is confirmed no intact fynbos occurs on site, but the mesic thicket/forest represents the original vegetation that would have occurred on site.

3. Following the procedures within the Species Environmental Assessment Guidelines, the natural areas on site (mesic thicket/forest) have been assessed as having Very High sensitivity / Ecological Importance, secondary thicket vegetation as having Medium sensitivity / Ecological Importance, and areas with alien vegetation as having Very Low sensitivity / Ecological Importance.
4. On the basis of the presence of natural habitat within a CBA1 area and within a listed ecosystem, it is verified that the site occurs partially within an area of VERY HIGH sensitivity with respect to the Terrestrial Biodiversity Theme. These areas are not directly affected by the proposed development.
5. No plant species of concern were found on site and based on the available habitat, it is considered unlikely that any occur there. It is therefore verified that the site has LOW sensitivity with respect to the Plant Species Theme.
6. The site is considered to be potential habitat for any of four of the animal species flagged for the site. The woodland habitats (mesic thicket/forest) is likely habitat for three animal species, the Knysna Warbler (Vulnerable), a small antelope (Vulnerable), and Duthie's Golden Mole (Vulnerable). A small, man-made pond on site is potential habitat for the Knysna Leaf-folding Frog (Endangered). It is therefore verified that the Animal Species Theme has MEDIUM sensitivity for the site.
7. The on-site vegetation was found to be mostly in a legally natural state. There are areas of secondary vegetation, and areas of dense alien plants, but these are legally natural vegetation within an Endangered ecosystem (according to the legal definition of natural vegetation in NEMA).
8. An impact assessment determined that the impact of the proposed development has Very Low significance for loss of fynbos vegetation, Medium significance for loss of mesic thicket vegetation (although this would change to High if any impacts did occur), Very Low significance for loss of protected trees, and Very Low significance for animal species of concern (although this would change if any of the species were detected on site).
9. Alternative B is marginally better than Alternative A, because Alternative A intrudes slightly into the thicket, whereas Alternative B is well away from the thicket.

#### Recommendations:

1. Mesic Thicket/Forest habitats on the steeply-sloping part of the site, have high biodiversity and conservation value, and are designated as sensitive. These areas must not be affected by the proposed development. The forest margin areas must be protected and post-construction rehabilitation should promote expansion of these forest margin areas. An open space management system should be developed to formalize such steps for mesic thicket/forest protection.
2. Fynbos habitats on site that are in an intact state are part of a listed Endangered ecosystem (Garden Route Shale Fynbos), and are sensitive. These areas must not be affected by the proposed development. If necessary and in consultation with the appropriate fire protection agency, a fire management plan should be implemented to maintain these areas in an ecologically functional state.
3. It is important for the maintenance of biodiversity and ecological patterns in the general Wilderness area that ecological linkages are maintained in the landscape. This includes

coastal-inland linkages, lowland-upland linkages, migration corridors that run parallel to the coast, and ecotones between the different major habitat types. The mesic thicket/forest area on site is a key component of all of these linkages.

4. Where rehabilitation of disturbed areas is implemented, including for previously invaded areas, establishment of site-appropriate indigenous species should be promoted, rather than use of exotic species, or species that are not ecologically appropriate for the site.
5. It is a legal requirement that an alien invasive management should take place on site. This will protect habitats from degradation and could potentially be the biggest contribution to maintaining and protecting biodiversity on site and in surrounding areas.
6. It is a legal requirement that a permit is required for any protected trees that may be affected by proposed development. A survey of all protected trees within the footprint area is required in order to apply for any necessary permits.

**Heritage Statement in support of Heritage Western Cape Notification of Intent to Develop (HWC NID – Section 38[8]): Proposed Development on Erf 1058, Hoekwil, Wilderness, Western Cape Province. Dr. Peter Nilssen, 18 July 2023:**

According to the SAHRIS PalaeoSensitivity Map the palaeontological sensitivity of Erf 1058 is low and no palaeontological studies are required.

The proposed development footprint on Erf 1058 has been impacted by farming activities (ploughing, cultivation and possible grazing) during the colonial period. As a result, the context of pre-colonial heritage resources in surface sediments was damaged, disturbed or destroyed. No colonial period heritage resources were identified on record or on the property.

Even though none were identified, if present on the property, then isolated Stone Age pieces are considered to be of low heritage value and are Not Conservation Worthy.

Due to the absence of significant heritage resources, the proposed activity will have negligible to no cumulative impacts on the archaeological or heritage value of the area.

This baseline investigation has shown that, if present, heritage resources on the affected part of the property would be of low significance and given a field rating of Not Conservation Worthy.

Since there are no significant heritage resources associated with the proposed development footprint, it does not meaningfully contribute to the cultural landscape of the area.

For reasons given above and on heritage grounds, the proposed activity will have negligible to no negative impact on the scenic route (N2) or aesthetic value of the area. A Visual Impact Assessment is being done in terms of NEMA, but is not warranted in terms of the NHRA.

The positive socio-economic impact, including some short, medium and long term jobs as well as the provision of accommodation for the tourism industry outweigh the negligible to zero negative impacts this project may have on heritage resources.

Because of the above, and because there is no reason to believe that significant heritage resources will be impacted by the proposed development on Erf 1058, it is recommended that no further



heritage-related specialist studies (as listed in the NID) are required and that a Heritage Impact Assessment is not warranted for the project.

**Visual impact assessment reports for the proposed development of erf 1058, Wilderness Heights. Paul Buchholz, 1 August 2023:**

The well positioned and designed development infrastructure allows for it to blend in very well with its surroundings and create minimal contrast in the landscape. With the effective implementation of mitigation measures, the visual impact of the proposed development will be further reduced.

**Planning Statement for the Proposed Development of Erf 1058, Whites Road, Hoekwil (Wilderness Heights) George Municipality. Marlize de Bruyn Planning, July 2023:**

The Wilderness-Lakes-Hoekwil area is one of the most popular tourism and residential destinations along the Garden Route, based on its unique terrestrial, aquatic and marine assets, outstanding rural and townscape qualities, and recreational amenity value. The proposed development of a residential house, 3 tourist accommodation units, and recreational facilities on Erf 1058 Hoekwil is directly in line with the character of the area.

The development proposal is guided by the topography, vegetation of the property and the owner's need to create accommodation that offers guests the feeling of remoteness in nature.

The rezoning of the property to Open Space Zone III (nature conservation area) will contribute to the conservation of the property and support the abutting Wilderness Lakes Protected Area.

From this motivation report, it is our opinion that the proposed land use application for Erf 1058 Hoekwil is consistent with all relevant considerations as prescribed by the planning legislation. It does not create conflict with the overall spatial objectives for the area.

**Site Sensitivity Verification and Agriculture Compliance Stateemnt for a Proposed Development on Erf 1058 in Wilderness, Western Cape Province. Johann Lanz (Soil Scientist), 28 October 2023.**

The agricultural impact of the proposed development is assessed as being acceptable because it results in negligible loss of future agricultural production potential. From an agricultural impact point of view, it is recommended that the development be approved. The conclusion of this assessment on the acceptability of the proposed development and the recommendation for its approval is not subject to any conditions.

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

**Aquatic Compliance Statement: Erf 1058, Wilderness, Western Cape. Dr. James M. Dabrowski of Confluent Environmental, June 2023:**

❖ Stormwater Management

A key impact related to residential developments is the generation of large volumes of stormwater associated with an increased area of impermeable surfaces (i.e. roads, roofs and other infrastructure). Stormwater is typically conveyed into watercourses, where high volumes (and associated high energy) cause degradation of watercourses, mainly due to the erosion of the bed and banks. In this respect given the steep slopes within the property, even though the drainage line is located outside of the development footprint, it is potentially vulnerable to stormwater impacts.

Given the location of the property in a FEPA and SWSA, it is therefore important that stormwater generated on site should be managed according to Sustainable Drainage System (SuDS) principles.

This requires that as much stormwater as possible should be attenuated within the development footprint. For example, the City of Cape Town guideline is that developments must provide for 24-hour extended detention of the 1-year return interval 24-hour storm event. In this respect the following measures, inter alia, should be considered:

- Rainwater harvesting tanks must be installed;
- Use of swales and detention ponds to attenuate stormwater runoff, encourage infiltration and reduce the speed, energy and volumes at which stormwater is discharged from the site;
- Use of permeable paving to encourage infiltration into the soil; and
- Use of retention ponds and artificial wetlands to capture stormwater runoff and prevent its discharge from the site.

❖ Erosion Management

The steep slopes of the property will be vulnerable to erosion during clearance of the site and the construction phase. It is therefore important that appropriate erosion control measures are implemented, which include inter alia, the following:

- Ensure that construction activities do not cause any preferential flow paths and concentrated surface runoff during rainfall events.
- Clearly demarcate the construction area and ensure that heavy machinery does not compact soil or disturb vegetation outside of these demarcated areas.
- Reduce transport of sediment through use of structures such as silt fences and biodegradable coir logs placed along a contour below the development footprint.
- Ensure that vegetation clearing is conducted in parallel with the construction progress to minimise erosion and runoff.
- Revegetate exposed areas once construction has been completed.
- Ensure that stormwater and runoff generated by hardened surfaces is discharged in retention areas (i.e. swales or retention ponds), to avoid concentrated runoff and associated erosion.

**Plant Species, Animal Species and Terrestrial Biodiversity Assessment Report for Erf 1058, Wilderness, George in the Western Cape Province. David Hoare Consulting (Pty) Ltd, 29 April 2024.**

- ❖ It would be ecologically desirable to (as much as possible) cluster development in nodes within previously disturbed areas and close to existing disturbance (e.g. major roads). Where development is proposed further from the main road, this should be located within existing open areas in the secondary thicket.
- ❖ Exclude development from areas of indigenous natural vegetation, in this case, the mesic thicket/forest at the bottom (southern side) of the site.
- ❖ Consult with the local fire protection agency regarding whether to implement a fire management plan for the site. Note that the natural vegetation occurring on site, and the probable natural vegetation in previously cultivated areas on site, is NOT fire-prone. Exclusion of fire will probably lead to promotion of more mesic thicket vegetation and exclusion of secondary fynbos, but this is supported by the ecological assessment of the site as likely having historically been mesic thicket.
- ❖ Access to areas of VERY HIGH sensitivity during construction must not be permitted by any construction personnel. These areas must be fenced off and no access allowed.
- ❖ Compile and implement an alien management plan, which highlights control priorities and areas and provides a programme for long-term control.
- ❖ Keep all proposed infrastructure away from the mesic thicket/forest areas. In all areas close to the mesic thicket, rehabilitation of disturbed areas after construction should promote natural successional processes that currently drive the secondary vegetation towards thicket development.

- ❖ Access to forested areas during construction must not be permitted by any construction personnel. These areas must be fenced off and no access allowed.
- ❖ Strictly control any possible erosion from upslope areas. There should be no erosion or runoff effects on the mesic thicket/forest areas.
- ❖ Undertake regular monitoring to detect erosion or other degrading impacts early so that they can be controlled.
- ❖ Where possible, retain well-developed thicket patches within the upper parts of the site. These have a high diversity of woody plant species, including several that occur within existing mesic thicket.
- ❖ Once construction is complete, rehabilitate previously disturbed areas to a state where natural successional processes can operate. Based on current processes occurring on site, this is very likely to lead to further thicket development within these areas.
- ❖ Future garden development on site should use only site-appropriate indigenous species. It is recommended that thicket species that currently occur on site be used for future gardens. This will result in mostly thicket-type vegetation developing, but this should be allowed to the extent that it doesn't compromise any fire-protection considerations.
- ❖ Do not disturb natural woodland where there is a continuous canopy of forest trees, and protect forest margin areas so that forest interiors maintain existing microhabitat conditions and structural integrity.
- ❖ If any trees need to be removed or pruned then a permit is required, according to the National Forests Act.
- ❖ If necessary, plant additional milkwoods in the development as part of the final landscaping. These can be planted along with other appropriate coastal forest species, but the proportions and composition should reflect habitat that would have occurred naturally at this site.

**Heritage Statement in support of Heritage Western Cape Notification of Intent to Develop (HWC NID – Section 38[8]): Proposed Development on Erf 1058, Hoekwil, Wilderness, Western Cape Province. Dr. Peter Nilssen, 18 July 2023:**

It is recommended that Heritage Western Cape consider and/or require that the following be included in the Environmental Authorisation / Environmental Management Program, if the project is approved:

- ❖ if any human remains or significant archaeological materials are exposed during mining activities, then the find should be protected from further disturbance and work in the immediate area should be halted and Heritage Western Cape must be notified immediately. These heritage resources are protected by Section 36(3)(a) and Section 35(4) of the NHRA (Act 25 of 1999) respectively and may not be damaged or disturbed in any way without a permit from the heritage authorities. Any work in mitigation, if deemed appropriate, should be commissioned and completed before construction continues in the affected area and will be at the expense of the developer.

**Visual impact assessment reports for the proposed development of erf 1058, Wilderness Heights. Paul Buchholz, 1 August 2023:**

The potential visual impacts and proposed mitigation must be undertaken by a professionally registered landscape architect that must be part of the design team (including engineers and architects). The brief of the landscape architect (LA) must include:

- ❖ The LA must consult with both engineers and architects to ensure that sensitive earthwork and building design development occurs, which will allow for reducing the construction and operation phase visual impacts.

- ❖ The LA must work with the project surveyor, arborist and planners in establishing which trees are to remain on site for visual screening and taking this information into the design development of the civil and building works.

The LA must prepare a landscape plan, design development thereof and monitoring implementation and thereafter maintenance. The plan must include the tree survey and what trees are, what indigenous vegetation is, to be retained, what is to be removed, the planting of indigenous trees, new trees and shrub planting along roadways and in open spaces in the built areas and a guideline document for private gardens within the development.

**Site Sensitivity Verification and Agriculture Compliance Stateemnt for a Proposed Development on Erf 1058 in Wilderness, Western Cape Province. Johann Lanz (Soil Scientist), 28 October 2023.**

No mitigation measures are required for the protection of agricultural production potential on the site because the site is not and will not be utilised as agricultural production land.

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.
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None – all recommended mitigation measures will be implemented.

4.	Explain how the proposed development will impact the surrounding communities.
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Tourism and recreation are ways to achieve economic growth and adds to the sense of place of the greater George municipal area as the gateway to the Garden Route. The GMSDF states that tourism accommodation and uses in varying formats in the urban and rural environments is a generally accepted principle. The visitors to this property will support economic opportunities created in the nodes and precincts, e.g. restaurants and recreational facilities in the Wilderness area.

The proposal will have socio-economic benefits in maintaining the natural environment and creating employment opportunities for the local communities.

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.
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Erf 1058 is approximately 800m from the high-water mark of the sea, and at an average height above sea level of between 64 – 110 meters. As such it is not subject to coastal erosion effects such as the risks arising from dynamic coastal processes, including the risk of sea-level rise. The development also falls outside of the coastal erosion risk lines (20-, 50-, and 100-year erosion) as determined by the Western cape Government (DEA&DP Coastal Management App).

In terms of legislation pertaining to the National Water Act, the development falls outside of the regulated area of the drainage line (i.e. outside of the riparian zone and 1:100 year floodline) and outside the regulated area of a wetland (Aquatic Compliance Statement).

6.	Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.
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There are no conflicts between specialist recommendations.

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.
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Mitigation measures recommended by the specialists have been included in the Environmental Management Programme (EMPr) (Appendix H).

8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.
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The layout and design of the site development plan took into account the topography of the property, the vegetation found on the property, and made use of existing disturbed areas and clearings on the property for the proposed structures, while also providing privacy for visitors. The proposed site layout therefore provides the best fit into the landscape that is also considerate of environmental features.

## SECTION J: GENERAL

### 1. Environmental Impact Statement

1.1.	Provide a summary of the key findings of the EIA.
<ul style="list-style-type: none"><li>❖ The project area marginally overlaps a CBA 1.</li><li>❖ All natural areas on site occur in areas designated as Critical Biodiversity Area 1. The site occurs partially within Garden Route Granite Fynbos, which is listed as Endangered. It is confirmed no intact fynbos occurs on site, but the mesic thicket/forest represents the original vegetation that would have occurred on site.</li><li>❖ The Site is mapped as Garden Route Granite Fynbos described as having a threat status of Critically Endangered.</li><li>❖ The site consists of a combination of mesic thicket/ forest (on the steep south-facing slopes), secondary thicket, and areas of alien trees.</li><li>❖ The natural areas on site (mesic thicket/forest) as having Very High sensitivity / Ecological Importance,</li><li>❖ Secondary thicket vegetation have been assessed as having Medium sensitivity / Ecological Importance,</li><li>❖ Areas with alien vegetation have been assessed as having Very Low sensitivity / Ecological Importance.</li><li>❖ On the basis of the presence of natural habitat within a CBA1 area and within a listed ecosystem, it is verified that the site occurs partially within an area of VERY HIGH sensitivity with respect to the Terrestrial Biodiversity Theme. These areas are not directly affected by the proposed development.</li><li>❖ No plant species of concern were found on site and based on the available habitat, it is considered unlikely that any occur there. It is therefore verified that the site has LOW sensitivity with respect to the Plant Species Theme.</li><li>❖ The site is considered to be potential habitat for any of four of the animal species flagged for the site. The woodland habitats (mesic thicket/forest) is likely habitat for three animal species, the Knysna Warbler (Vulnerable), a small antelope (Vulnerable), and Duthie's Golden Mole (Vulnerable). A small, man-made pond on site is potential habitat for the Knysna Leaf-folding Frog (Endangered). It is therefore verified that the Animal Species Theme has MEDIUM sensitivity for the site.</li><li>❖ <i>There is currently no typical fynbos vegetation on site.</i> The vegetation that currently occurs on site is not representative of the regional vegetation type, Garden Route Granite Fynbos. In the areas not currently occupied by natural thicket, it is currently a combination of secondary thicket with a small number of species that are considered to be fynbos elements.</li><li>❖ <i>There are currently few fynbos plant species on site.</i> The fynbos species that occur on site are a small number of species that typically colonise previously disturbed areas. The suite of fynbos species that occur on site are small in number (only 9 species), and have been consistently observed to emerge in areas recently cleared of pine plantations.</li><li>❖ <i>There are no nearby areas from which recruitment of natural fynbos species can take place.</i> All nearby areas that currently contain some form of vegetation that resembles fynbos are previously cultivated areas. This means that any fynbos vegetation that occurs there is secondary and also not representative of the regional vegetation type.</li><li>❖ <i>There is unlikely to be any soil seed bank of fynbos species occurring on site.</i> Historical aerial photographs show that the site was ploughed prior to 1936 (exact date of initial ploughing unknown but probably many years prior to 1936), therefore any soil seed bank would need to have survived almost 100 years, possibly more. Soil seed survival is unlikely for the majority of species that could occur in typical fynbos. Recruitment from a soil-based seed bank would therefore yield few original species (if any).</li><li>❖ The site falls within Primary Catchment K (Kromme) area and in quaternary catchment K30D.</li></ul>	



- ❖ The property falls within sub-quaternary catchment (SQC) 9173, which, according to the National Freshwater Ecosystem Priority Atlas (NFEPA, Nel et al., 2011), has been classified as a Freshwater Ecosystem Priority Area (FEPA).
- ❖ The site does fall within the Outeniqua Strategic Water Source Area (SWSA) (Figure 1) which is considered to be of national importance.
- ❖ According to geospatial data sources a non-perennial drainage line runs just outside of the western boundary of the property. The drainage line is confirmed as a non-perennial drainage line, with very limited habitat development.
- ❖ No other watercourse are mapped to occur within the property boundaries.
- ❖ No aquatic features have been included in the Western Cape Biodiversity Spatial Plan (WCBSP) covering the property.
- ❖ In terms of legislation pertaining to the NWA, the development falls outside of the regulated area of the drainage line (i.e. outside of the riparian zone and 1:100 year floodline) and outside the regulated area of a wetland.
- ❖ Given that the entire footprint is located outside of the watercourse and its associated buffer, the sensitivity of aquatic biodiversity on the property can be regarded as Low.
- ❖ The proposed development footprint has been impacted by farming activities (ploughing, cultivation, and possible grazing) during the colonial period.
- ❖ No significant heritage resources will be impacted by the proposed development.

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)

See Appendix B2.

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

**Table 2: Positive and Negative Aspects of the Project.**

Specific Aspect of Proposal	Positive	Negative
Planning Policy, Documentation and Urban Edge.	The proposal aims to provide accommodation for the property owner and tourists on a section of the property which is not indicated as a specific spatial planning category. The Western Cape Land Use Planning Guidelines: Rural Areas (2019) states that overnight accommodation can be provided in a CBA-area with temporary structures preferred (e.g., wooden structures, tents, raised boardwalks, and/or tree canopy structures), with units carefully dispersed or clustered (depending on the landscape, habitat and existing infrastructure and access) to achieve least impact. The use of alternative porous materials and innovative eco-friendly design concepts are encouraged. The accommodation units are not to be provided within the demarcated CBA-areas.	None.

Rezoning	The rezoning of the property to Open Space Zone III (nature conservation area) will contribute to the conservation of the property and support the abutting Wilderness Lakes Protected Area.	The function of small holdings as a settlement type is described as low-density rural living, with an agricultural component with reference in the relevant LSDF. Wilderness Heights is one such small holding area.  Loss of agricultural component of a small holding is not considered to be significant.
Bulk Services supply	There already is a water connection point that the proposed development can connect to and there should be no pressure / demand on the current system.  Access to the property is currently available through the existing roads network.  The development aims to be self sufficient as far as possible whereby it will not connect to the sewage network and be off-grid.	All wastewater, water supply and stormwater will need to be managed but this is achievable with all the correct mechanisms and mitigation in place.
Conservation Status / value	This habitat unit is characterised by high levels of disturbance owing to its proximity to historical land-use and anthropogenic activities and main roads. Accordingly, the landcover is not congruent with the expected natural vegetation and therefore does not pose a high biodiversity value where the development is proposed.	The development is partially within a CBA. Loss of a small area identified as a CBA.
Vegetation and Habitats	The location, ecological state, and size of the habitats within the Project Area denotes that it is unlikely that any functional habitat or SCC will be lost as a result of the impacts arising from the proposed development. Landscaping with indigenous plant species will contribute towards a potential positive biodiversity gain.	Loss of vegetation and potential habitats. This can be managed and mitigated to limit the disturbance of vegetation.
Fauna / ecological corridors	Faunal species of conservation concern were not identified on the property. The development does not pose a significant impact to ecological connectivity.  Clearing of AIP and landscaping with indigenous plant species will contribute towards a potential	Potential fragmentation of areas of indigenous vegetation.  Recommended mitigation measures to reduce the negative fragmentation effects of the development and enable the safe movement of fauna species. Areas of indigenous vegetation, even

	positive biodiversity gain and increased habitat for indigenous fauna.	secondary communities outside of the direct project footprint, should not be fragmented or disturbed further during the construction phase
Erosion	Rehabilitation of disturbed areas with indigenous vegetation.	The steep slopes of the property will be vulnerable to erosion during clearance of the site and the construction phase. Appropriate erosion control measures will be implemented.
Noise and Visibility	The scale and location of the development should not result in these forms of pollution.	Visual and noise Impacts to adjacent residents during construction phase.
Alien Vegetation	Systematically remove invasive alien vegetation (also in the operational phase).	Loss of natural vegetation and increased fire risk if not removed. Restoration of indigenous vegetation where there is heavy AIP infestation.
Fire risk	Removal of alien vegetation to reduce fuel load.	Fire risk may be high if alien vegetation is not removed.
Stormwater	Stormwater generated on site will be managed according to Sustainable Drainage System (SuDS) principles – swales, detention ponds, permeable paving, and artificial wetlands.	Although the drainage line is located outside of the development footprint, it is potentially vulnerable to stormwater impacts given the steep slopes within the property.
Site Access	Access to the property is currently available through the existing roads network.	Potential increased vehicle movement.

## 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
See Appendix J – Impact Assessment Table.	
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.
<p>The following conditions must be considered:</p> <ul style="list-style-type: none"> <li>❖ Implementation and maintenance of the recommended 36m buffer from the non-perennial drainage line. All development and associated activities must remain outside of this buffer zone.</li> <li>❖ The Mesic Thicket habitat on the steeply-sloping part of the site must not be affected by the proposed development and must be indicated as a no-go area.</li> <li>❖ Indigenous trees as well as indigenous forest patches be incorporated in the proposed layout as no-go areas and be surveyed and cordoned off in order to be retained.</li> <li>❖ A suitably qualified Environmental Control Officer (ECO) be appointed for the duration of construction.</li> <li>❖ Compliance with the Environmental Management Programme (EMPr).</li> </ul>	
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.
The rezoning of the property to Open Space Zone III (nature conservation area) will contribute to the conservation of the property and support the abutting Wilderness Lakes Protected Area. The owner is	

willing to discuss the possibility of a stewardship agreement with SANParks to conserve and manage the remaining natural habitat on the property.

The proposed development (as per the Planning Statement) is consistent with all relevant considerations as prescribed by the planning legislation. It does not create conflict with the overall spatial objectives for the area.

The impact assessment by Hoare (2024) determined that the impact of the proposed development has Very Low significance for loss of fynbos vegetation, Medium significance for loss of mesic thicket vegetation (which will not be disturbed), Very Low significance for loss of protected trees, and Very Low significance for animal species of concern (although this would change if any of the species were detected on site).

While the development is located within a FEPA and SWSA, the implementation of the proposed management recommendations, together with the implementation (and maintenance) of the recommended 36m drainage line buffer will prevent impacts to aquatic biodiversity and the ability of the land to continue to produce high quantities of good quality water. Given that the entire footprint is located outside of the watercourse and its associated buffer, the sensitivity of aquatic biodiversity on the property can be regarded as Low (Dabrowski 2023).

None of the specialists have found any aspects of concern related to this development. There are no fatal flaws associated with the proposed development. It is the opinion of the EAP that the application may be authorised.

2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.
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As per the Plant, Animal and Terrestrial Biodiversity Assessment (Hoare 2024), the part of the site that is affected by the proposed development is mapped as Garden Route Granite Fynbos, but currently contains secondary thicket patches, alien plants and some small areas of herbaceous vegetation that includes a small number of fynbos elements typical of secondary vegetation.

There are two scenarios that can be evaluated with respect to the possible loss of natural fynbos on site:

1. Fynbos previously occurred there naturally but has been lost due to historical processes of degradation.
2. Fynbos never occurred there naturally and will therefore not be affected.

The more likely scenario is that fynbos didn't naturally occur on site prior to cultivation in 1936. This is supported by various observations:

1. Landcover data shows that, within areas currently in proximity to the site (within about 10 km) defined as either Garden Route Granite Fynbos or Garden Route Shale Fynbos, most remnants are thicket/forest, not fynbos. The only places that fynbos currently seems to occur is in locations where the environment specifically supports pockets of fynbos, such as localised areas on north-facing (drier, warmer) slopes, or areas with atypical substrate properties.
2. Climate data shows that the Wilderness area has mean annual rainfall patterns typical of the Forest Biome (intermediate to Albany Thicket Biome), not typical of the Fynbos Biome, therefore it would be expected that the typical vegetation would be forest or mesic thicket.
3. Remnant vegetation in the Wilderness area show that areas with similar slope, aspect and elevation above sea level in proximity to the site currently contain mesic thicket/forest typical of the Wilderness area, not fynbos.
4. Secondary vegetation on site is rapidly developing towards mesic thicket in both structure and species composition. Woody species (trees and shrubs) that have already established in these

secondary vegetation areas include *Allophylus decipiens*, *Buddleja saligna*, *Diospyros whyteana*, *Elaeodendron croceum*, *Grewia occidentalis*, *Gymnosporia buxifolia*, *Gymnosporia nemorosa*, *Myrsine africana*, *Olea europaea*, *Pittosporum viridiflorum*, *Pterocelastrus tricuspidatus*, *Putterlickia pyracantha*, *Rapanea melanophloeos*, *Scutia myrtina*, *Searsia chirindensis*, *Searsia lucida*, *Searsia pallens*, *Sideroxylon inerme*, *Tarchonanthus littoralis*, *Trimeria grandifolia*, *Vepris lanceolata*, and *Zanthoxylum capense*. This is accompanied by a suite of herbaceous species found in woody vegetation, not fynbos.

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.

The EA is required for a period of ten (10) years. Dates to be determined at the Draft BAR phase.

### 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.

Rainwater will be harvested from all roofs and stored in multiple 10,000 Liter or 5,000 Liter tanks. This water will be supplemented as needed from a new 25 mm connection to the George municipal water network (Appendix E16).

The total water consumption for all the buildings (main dwelling, studio office, accommodation) per month is 51351.4 litres. This is calculated to 1711.7 litres per day.

Rainwater will be harvested from all roofs. Assuming an average rainfall of 85 mm per month, the calculation as per the Engineering and Services Report shows that sufficient water can be collected to service all consumption without using any of the municipal water supply. It is planned to provision about 120,000 Liter of storage to collect any excess rain during the rainy season.

### 4. Waste

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

Waste diversion will be introduced through recycling compostable organic kitchen waste and by separating out recyclable materials.

The total quantity of waste removal is estimated, based on information obtained from the *George Local Municipality Integrated Waste Management Plan*<sup>4</sup> as follow:

- The total waste per person per day (kg/p/d) based on the assumption of a high-income category due to tourism is 1.29 kg/p/d.
- A more conservative value of 2 kg/p/d is used, which is also in line with the Western Cape average.
- An average tourism occupancy rate of 30 % for the "Other" accommodation category is used, which is slightly higher than monthly values reported in the STATS SA report of 2023.
- Food and garden waste should make up about 25% and 13% of the waste profile. Through use of composting and mulching of the above organic waste at the premises, it is estimated that a conservative reduction of at least 38% can be made to the waste that needs to be collected per person.
- By volume, 38.3% of the waste stream is composed of mainstream recyclables (paper, plastic, cardboard, glass and metal).

<sup>4</sup> George Local Municipality Integrated Waste Management Plan, 2020 – 2025, GE38216, March 2020



This means that the quantity of refuse to be collected is calculated as:

- 45 kg/week of recyclable material (blue bag system) and
- 28 kg/week of non-compostable/recyclable material (black bag system)

A weekly refuse removal service is already available and being billed for at the address of the proposed development.

## 5. Energy Efficiency

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

No connection to the grid will be made. The whole property will be electrically self-sufficient. Electricity will be provisioned by means of roof mounted photo voltaic (PV) panels mounted on the main house and studio building, together with the centrally placed and requisite inverters and storage batteries. Electricity will be provisioned to the various buildings by underground armoured cable. The routes for burying the cables will be as far as possible coincidental with the service road to the lower part of the property.

In case of extended overcast weather, a suitably sized generator will be installed at the Studio building to provide for the basic power requirements.

There are various technological aspects which may be implemented as a matter of course in order to assist with overall energy saving:

- Solar geysers and geyser thermal insulation.
- Use of gas for heating and cooking requirements.
- Energy efficient light bulbs.
- Natural ventilation in the buildings / structures.

## SECTION K: DECLARATIONS

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

I, AG Polson, ID number 6804265042084 in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
  - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - Legitimate costs in respect of specialist(s) reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

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



Signature of the Applicant:

20 May 2024

Date:

Wealth Spring (Pty) Ltd

Name of company (if applicable):

## DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (“EAP”)

I, **Joclyn Marshall**, EAP Registration number **2022/5006** as the appointed EAP hereby declare/affirm the correctness of the:

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



Signature of the EAP:

**16 May 2024**

Date:

### **Eco Route Environmental Practitioners**

Name of company (if applicable):

## DECLARATION OF THE REVIEW EAP

I ....., EAP Registration number ..... as the appointed Review EAP hereby declare/affirm that:

- I have reviewed all the work produced by the EAP;
- I have reviewed the correctness of the information provided as part of this Report;
- I meet all of the general requirements of EAPs as set out in Regulation 13 of the NEMA EIA Regulations;
- I have disclosed to the applicant, the EAP, the specialist (if any), the review specialist (if any), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; 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):

## DECLARATION OF THE SPECIALIST

### **See Specialist Studies for Declaration of Independent**

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

I ....., as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, 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 development proposal or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

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Signature of the EAP:

Date:

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Name of company (if applicable):



**DECLARATION OF THE REVIEW SPECIALIST**

I ....., as the appointed Review Specialist hereby declare/affirm that:

- I have reviewed all the work produced by the Specialist(s):
- I have reviewed the correctness of the specialist information provided as part of this Report;
- I meet all of the general requirements of specialists as set out in Regulation 13 of the NEMA EIA Regulations;
- I have disclosed to the applicant, the EAP, the review EAP (if applicable), the Specialist(s), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; 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):