



CONSIDERATION OF THE DFFE NEED AND DESIRABILITY GUIDELINE (2017) IN THE ENVIRONMENTAL BASIC ASSESSMENT PROCESS FOR PROPOSED NEW REGIONAL CEMETERY ON PORTION 33 OF THE FARM HILL VIEW NO. 437, PLETTENBERG BAY, WESTERN CAPE

According to the DFFE Need and Desirability Guideline (2017), the need for and desirability of a proposed activity must specifically and explicitly be addressed throughout the EIA process (screening, "scoping", and assessment) when dealing with individual impacts and specifically in the overall impact summary by taking into account the answers to inter alia the following questions:

1.7.2

Intra- and inter-generational equity in the context of sustainability

The report by the World Commission on Environment and Development, *Our Common Future*, issued in 1987 (also referred to as the "Brundtland Report"), is widely regarded as the key point in the evolution of the concept of "sustainability" and "sustainable development". The Brundtland Report defined sustainable development as "*development that meets the needs of the present without compromising the ability of future generations to meet their own needs*" (WCED, 1987). Two key concepts conveyed in this definition are the notion of "needs" with a particular focus on the disadvantaged portion of current societies, and the sense of limits on the ability of the environment to meet the needs of current and future generations.

The Strategic Framework for Sustainable Development (SFSD) emphasises that South Africa's current development path in many respects are not sustainable in the long-term. It highlights that economic growth in South Africa is achieved by

"consuming natural resources and degrading our habitat at accelerating rates with the inevitable consequence that future economic growth and development objectives will be prejudiced." (DEAT 2007).

Intra-generational equity also refers to equitable access to, or distribution of opportunities, resources, (positive and negative) impacts between individuals and between current societies. Inter-generational equity refers to the equitable distribution of opportunities, resources, (positive and negative) impacts between current and future societies. As such, the manner in which resources are used to address the needs of current societies, must not demise the options of future societies to experience the same opportunities.

1.13

Cumulative effects

In terms of the EIA Regulations "cumulative impact", in relation to an activity, means the impact of an activity that in itself may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area;

Cumulative effects can be:

- Additive: the simple sum of all the effects (e.g. fertilizer inputs to a river from farms in the catchment);
- Synergistic: effects interact to produce a total effect greater than the sum of individual effects. These effects often happen as habitats or resources approach capacity (e.g. fragmentation of habitat for a species can have limited effect until additional fragmentation makes areas too small to support that species at all);
- Time crowding: frequent, repetitive impacts on a particular resource at the same time (e.g. small-scale mining within a particular ecosystem).
- Neutralizing: where effects may counteract each other to reduce the overall effect (e.g. infilling of a wetland for road construction, and creation of new wetlands for water treatment).
- Space crowding: high spatial density of impacts on an ecosystem (e.g. rapid expansion of urban sprawl).

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Crucial to the identification of cumulative implications of an activity or project, is to have an understanding of the context within which the impact will occur. For example, if the context (goal/vision) for an area is to protect its agricultural land use potential and its associated landscape character, the anticipated cumulative implications associated with the establishment of an industrial plant will be significant.

2.14

Opportunity Cost

Opportunity costs refer to the process of considering and comparing the ecological, social and economic costs, implications and opportunities of different alternatives. Choosing a specific option, alternative or path may result in other options (and its associated opportunities) being foregone - the loss of these opportunities are referred to as the opportunity cost of the preferred option. Assessing the opportunity costs of different options will also assist in the search for alternatives that will result in -

- the understanding the value of the foregone opportunities;
- the achievement (or at least contribute most to the achievement) of the desired aim/goal for the specific area;
- optimising positive impacts;
- minimising negative impacts;
- the equitable distribution of impact (negative and positive); and
- the maintenance of ecological integrity and environmental quality.

The above is also linked to the positive duty to find the "best practice environmental option", which is defined in NEMA as *"the option that provides the most benefit or causes the least damage to the environment as a whole, at a cost acceptable to society, in the long term as well as in the short term"*

The need to consider the opportunity costs of different options are particularly relevant in instances where resources are limited, environments that are under stress.

Examples where the consideration of opportunity cost is relevant include the option of redeveloping and public open space into a parking area. Another example is where it is confirmed that there are adequate water resources to service a development proposal. Applying the "opportunity cost" principle would change the question being asked, by placing a positive duty to consider if the proposed development will constitute the best use of the available water resources (i.e. the best practicable environmental option).

Guideline Question	Response
Section 1: Securing Ecological Sustainable Development and Use of Natural Resources	
<p>1. How will this development (and its separate elements/aspects) impact on the ecological integrity of the area?</p>	<p>Ecological impacts of this development have been assessed as described in the Basic Assessment Report (BAR), by specialists-</p> <p>Plants, Animals and Terrestrial Biodiversity Assessment (David Hoare Consulting (Pty) Ltd, 23 May 2024) –</p> <p>1. The proposed development is located primarily within areas of alien trees, but also affects a small area of scrub thicket and a sliver of mesic thicket. However, the edge of the proposed development extends partly down a steep slope, therefore downslope effects on forest and mesic thicket habitats is possible.</p> <p>2. All natural areas on site occur in areas designated as Other Natural Area, or Ecological Support Area (drainage lines). No Critical Biodiversity Areas are affected or occur on site.</p> <p>3. The site occurs mostly within South Outeniqua Sandstone Fynbos, which is not listed, and partially within Southern Afrotemperate Forest (not mapped as occurring on site but confirmed to occur there).</p> <p>4. Following the procedures within the Species Environmental Assessment Guidelines, the Forest and Fynbos have been assessed as having Very High sensitivity / Site Ecological Importance, mesic thicket as having High sensitivity / Site Ecological Importance, Scrub Thicket as having Medium sensitivity / Site Ecological Importance, and areas of Aliens as having Low sensitivity / Site Ecological Importance.</p> <p>5. No plant species of concern were found on site but based on the available habitat, it is considered possible that any of nine plant species flagged for the site could occur there. It is therefore verified that the site has MEDIUM sensitivity with respect to the Plant Species Theme, within areas of natural habitat.</p> <p>6. The site is considered to be potential habitat for any of three of the animal species flagged for the site. The woodland habitats (forest, mesic thicket, scrub thicket) is likely habitat for three animal species, the Knysna Warbler (Vulnerable), a small antelope (Vulnerable), and the Crowned Eagle (Near Threatened). It is therefore verified that the Animal Species Theme has MEDIUM sensitivity for the site.</p> <p>Aquatic Biodiversity Compliance Statement (Dr. Jackie Dabrowski Confluent Environmental (Pty) Ltd, June 2023) –</p>

	<p>1. No watercourses were observed during the site visit. Based on topography of the site, observations during the site visit, and inspection of aerial / satellite images, watercourses to the west and east of the cemetery site were delineated according to Ollis et al., (2013). Both watercourses were delineated as drainage lines grading to streams as the gradient increases. The extent of the riparian zone was delineated using satellite and historical imagery which indicates a distinct zone of vegetation associated with the watercourse.</p> <p>2. Buffers recommended for both watercourses were determined to be 37 m width measured from the edge of the delineated riparian zone.</p>
<p>1.1. How were the following ecological integrity considerations taken into account?:</p> <p>1.1.1. Threatened Ecosystems,</p> <p>1.1.2. Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure,</p> <p>1.1.3. Critical Biodiversity Areas ("CBAs") and Ecological Support Areas ("ESAs"),</p> <p>1.1.4. Conservation targets,</p> <p>1.1.5. Ecological drivers of the ecosystem,</p> <p>1.1.6. Environmental Management Framework,</p> <p>1.1.7. Spatial Development Framework, and</p> <p>1.1.8. Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.). 16</p>	<p>1.1.1 The proposed development falls within an area of Least Concern in terms of Threatened Ecosystems.</p> <p>1.1.2 No watercourses were noted during the site visit by the aquatic specialist. However, the two mapped watercourses have been described as drainage lines and a buffer zone has been placed around a delineated riparian zone.</p> <p>1.1.3 There is a band of CBA mapped on the southern portion of the property. The proposed development will not fall within this band. The proposed development occurs within an area categorised as Other Natural Area.</p> <p>1.1.4 There are no conservation targets for the property; however, according to the Terrestrial specialist, the areas identified as Forest and Mesic Thicket must be conserved and protected from development. The proposed development is outside of the Forest area, but is within a sliver of the Mesic Thicket habitat. The Mesic Thicket area must be retained as part of the forest buffer as much as possible; therefore, no more development must be placed within this area.</p> <p>1.1.5 Same as above.</p> <p>1.1.6 The Bitou Municipality currently does not have an EMF.</p> <p>1.1.7 The Bitou SDF 2022 states the capacity of all cemeteries in the municipality and the proposal for the cemetery being assessed in this document:</p> <p>The municipality currently have eight cemeteries located throughout the municipal area. The majority of the cemeteries have no spare capacity as shown in the table below.</p>

	<p>Table 21: Cemetery Capacity</p> <table border="1"> <thead> <tr> <th>LOCATION</th> <th>NUMBER OF CEMETERIES</th> <th>% FULL</th> </tr> </thead> <tbody> <tr> <td>Plettenberg Bay</td> <td>1</td> <td>100%</td> </tr> <tr> <td>Wittedrift</td> <td>2</td> <td>100%</td> </tr> <tr> <td>Kranshoek</td> <td>1</td> <td>50%</td> </tr> <tr> <td>Kwanokuthula</td> <td>1</td> <td>50%</td> </tr> <tr> <td>New Horizons</td> <td>1</td> <td>100%</td> </tr> <tr> <td>The Craggs</td> <td>2</td> <td>60%</td> </tr> </tbody> </table> <p>1.1.8 Climate change: in terms of increased rainfall and severe storm events, the development may cause pollution to nearby water sources. Stormwater management needs to be sufficiently developed to deal with extreme rainfall events and not just regular rainfall of the area.</p>	LOCATION	NUMBER OF CEMETERIES	% FULL	Plettenberg Bay	1	100%	Wittedrift	2	100%	Kranshoek	1	50%	Kwanokuthula	1	50%	New Horizons	1	100%	The Craggs	2	60%
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<p>1.2. How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity? What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</p>	<p>There are no conservation targets for the property; however, according to the Terrestrial specialist, the areas identified as Forest and Mesic Thicket must be conserved and protected from development. The proposed development is outside of the Forest area, but is within a sliver of the Mesic Thicket habitat. The Mesic Thicket area must be retained as part of the forest buffer as much as possible; therefore, no more development must be placed within this area.</p> <p>As per the Plant, Animals, & Terrestrial Biodiversity Assessment, 23 May 2024: The WC BSP map for Bitou shows that the entire development footprint on site (all natural areas except for roads) is within Other Natural Area (ONA). There are also Ecological Support Areas (ESA1) on site that correspond with the bottoms of the valleys, and there is a small area of CBA1 at the southern end of the site (not affected by the proposed development). This desktop description verifies that small parts of the site are included in conservation zones but that the development footprint is outside of such zones. The development therefore has LOW sensitivity with respect to this layer.</p> <p>In addition, no watercourses will be disturbed by the development. However, it is important for the developer to ensure that the delineated riparian zone is not affected by infrastructure related to the development.</p>																					
<p>1.3. How will this development pollute and/or degrade the biophysical environment? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance</p>	<p>Pollution to groundwater - groundwater quality may be affected from contamination of soil from waste areas, leachate from decaying bodies and increased infiltration due to poor stormwater management.</p> <p>Storm water management and management of excavation areas are standard mitigation options for surface water runoff, ponding and increased turbidity loads. Surface runoff and water ingress should be minimised by limiting excavation areas on a needs</p>																					

<p>positive impacts?</p>	<p>bases and implementing erosion control areas in graded areas.</p> <p>Leachate generation can be minimised using concrete vaults in medium risk areas, particularly where the vadose zone is less defined in low lying areas. Infiltration of rainfall through grave sites can be minimised by appropriate earthworks techniques that promote runoff away from grave sites. Similar techniques can be implemented to promote the shallow groundwater seepage away from grave sites.</p> <p>A mandatory exclusion zone should be applied to all existing and new boreholes. Should the existing borehole BH_New_Horizon not be considered for future production, then the borehole should be converted to a monitoring station for water level and background water quality. An additional on-site or downslope monitoring borehole should be considered to carry out routine monitoring of the groundwater beneath the site and compared to the background monitoring to establish the occurrence of pollution and extent thereof, if any.</p>
<p>1.4. What waste will be generated by this development? What measures were explored to firstly avoid waste, and where waste could not be avoided altogether, what measures were explored to minimise, reuse and/or recycle the waste? What measures have been explored to safely treat and/or dispose of unavoidable waste ?</p>	<p>During the construction phase, general waste associated with the construction activities will be generated. This waste is expected to be minimal. Furthermore, the EMPr deals with the management of waste, indicating that the waste management hierarchy must be implemented as far as possible. This will assist in reducing the waste produced on the site and will enable the reusing and/or recycling what waste is produced.</p> <p>During the operational phase, general waste will be generated when funerals are taking place.</p> <p>In addition, hazardous waste called leachate will be produced from decaying bodies. Mitigation has been addressed in point 1.3.</p>
<p>1.5. How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</p>	<p>The site inspection identified no heritage resources and it is not expected that the proposed development will have an impact on heritage resources or the heritage value of the area.</p>
<p>1.6. How will this development use and/or impact on non-renewable natural resources?</p>	<p>Very little energy will be required during the construction phase and operational phases. The municipality is encouraged to include green building practises in the development of structures on the</p>

<p>What measures were explored to ensure responsible and equitable use of the resources? How have the consequences of the depletion of the non-renewable natural resources been considered? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</p>	<p>property to increase energy efficiency and decrease waste production.</p>
<p>1.7. How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part?</p> <p>Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds? What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources? What measures were taken to ensure responsible and equitable use of the resources? What measures were explored to enhance positive impacts?</p> <p>1.7.1. Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth or does it reduce resource dependency (i.e. dematerialised growth)? (note: sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve</p>	<p>A minimal volume of water is required for the cemetery operation. Confirmation from the Bitou Municipality for sufficient water supply for the development will be included in the Final BAR. However, it is recommended that rainwater harvesting is incorporated into the development to deal with any water shortfall events that may occur and to decrease the dependence on municipal water.</p> <p>No</p>

<p>their quality of life)</p> <p>1.7.2. Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra- and intergenerational equity, and are there more important priorities for which the resources should be used (i.e. what are the opportunity costs of using these resources this the proposed development alternative?)</p> <p>1.7.3. Do the proposed location, type and scale of development promote a reduced dependency on resources?</p>	<p>No impact expected.</p> <p>The type of development (cemetery) will not require a large volume of water to operate. In addition, the collection of rainwater and the recycling of greywater could decrease the cemetery's overall water use.</p>
<p>1.8. How were a risk-averse and cautious approach applied in terms of ecological impacts?:</p> <p>1.8.1. What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?</p> <p>1.8.2. What is the level of risk associated with the limits of current knowledge?</p> <p>1.8.3. Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?</p> <p>What measures were taken to enhance positive impacts?</p>	<p><i>The EAP</i> assumes that information gathered from the applicant and specialists is accurate and adequate for the assessment of potential impacts that may arise from the proposed development. It is also assumed that all mitigation, management, and monitoring measures prescribed in the BAR and the accompanying EMPr will be implemented by the proponent.</p> <p>There are no significant gaps in knowledge. Detailed assessments of the potential ecological impacts were undertaken to reduce uncertainties, assumptions, and gaps. The assessment of the site was based on site visits undertaken by specialists and is deemed by the independent specialists to be sufficient for the study.</p> <p>A risk averse and cautious approach, as per the principles in Section 2 of NEMA, has been applied in the identification and assessment of potential impacts. The consequences of all impacts have been identified in the impact assessment, and mitigation measures provided to ensure the impacts are as low as possible. In so doing, the precautionary principle of environmental management has been applied throughout the Basic Assessment Process to ensure that all potential negative (and positive) ecological and socio-economic impacts are assessed. The level of risk associated with the limits of current knowledge described above is therefore considered to be low.</p>
<p>1.9. How will the ecological impacts resulting from this development impact on</p>	<p>The proposed development is anticipated to have negligible negative impacts on people's environmental rights.</p>

<p>people's environmental right in terms the following:</p> <p>1.9.1. Negative impacts: e.g. access to resources, opportunity costs, loss of amenity (e.g. open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</p> <p>1.9.2. Positive impacts: e.g. improved access to resources, improved amenity, improved air or water quality, etc.</p>	<p>1.9.1 Without mitigation, the cemetery has a high potential to pollute groundwater leading to the contamination of the drinking water of local communities adjacent to the cemetery. It is not an option for the developer to ignore the mitigation measures provided by the geohydrologist as this would lead to serious health impacts to the local community.</p> <p>1.9.2 The burial of loved ones is part of many societal norms. Without burial space, many communities will be impacted negatively by having their basic need unmet. It is extremely important to have burial space for the local community; therefore, the development of this cemetery would be a positive impact, but also necessary for the Bitou community. The municipality has run out of burial space in existing cemeteries and is in desperate need to provide a new cemetery to the community.</p>
<p>1.10. Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socio-economic impacts (e.g. on livelihoods, loss of heritage site, opportunity costs, etc.)?</p>	<p>Human wellbeing, livelihoods and ecosystem services are inextricably linked. The proposed development is anticipated to not have significant impacts on ecosystem services, as agreed by specialists. The societal need for a cemetery outweighs the minimal impact to the ecosystem. The cemetery location is not within a sensitive ecosystem and all negative impacts to the environment can be mitigated.</p>
<p>1.11. Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives/targets/considerations of the area?</p>	<p>This point has already been addressed above.</p>
<p>1.12. Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the "best practicable environmental option" in terms of ecological considerations?</p>	<p>Overall, specialist recommended mitigation measures result in satisfactory post mitigation impact significance.</p>
<p>1.13. Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and</p>	<p>Cumulative impacts have been assessed as part of each impact in Section H of the BAR.</p>

nature of the project in relation to its location and existing and other planned developments in the area?

Section 2: Promoting Justifiable Economic and Social Development

2.1. What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?:

2.1.1. The IDP (and its sector plans' vision, objectives, strategies, indicators and targets) and any other strategic plans, frameworks of policies applicable to the area,

2.1.2. Spatial priorities and desired spatial patterns (e.g. need for integrated of segregated communities, need to upgrade informal settlements, need for densification, etc.),

2.1.3. Spatial characteristics (e.g. existing land uses, planned land uses, cultural landscapes, etc.), and

2.1.4. Municipal Economic Development Strategy ("LED Strategy").

As per the Bitou IDP 2024-2025, one of the Community Development Priorities include the accelerated construction of a cemetery. In a previous version of the IDP (2017 – 2022), the details of a proposed cemetery and location were discussed:

Phase 1 of the study to identify a location for a new regional cemetery was done on Portion 33 of 437 (the application area). This location was the most feasible location based on numerous factors and inputs from professional consultants.

Phase 2 is the submission of all relevant studies to obtain authorisations and development rights for the new regional cemetery. The NEMA application is in process. Due to the fact that the integrated development, which includes housing which will be partly funded through the Department of Rural Development which stipulates specific housing typologies only, the housing component is to be dealt with as a separate matter. The cemetery application will therefore now be dealt with separately, which is under way.

The latest version of the Bitou IDP acknowledges the need for a regional cemetery and is identified as a key performance area for infrastructure development. Therefore, this proposal is highly consistent with the Bitou IDP (Marike Vreken Specialist Planning Report – Appendix G)

The Bitou SDF 2022 states the capacity of all cemeteries in the municipality and the proposal for the cemetery being assessed in this document:

The municipality currently have eight cemeteries located throughout the municipal area. The majority of the cemeteries have no spare capacity as shown in the table below.

Table 21: Cemetery Capacity

LOCATION	NUMBER OF CEMETERIES	% FULL
Plettenberg Bay	1	100%
Wittedrift	2	100%
Kranshoek	1	50%
Kwanokuthula	1	50%
New Horizons	1	100%
The Craggs	2	60%

As this is a municipal project, the Development Proposals plan of the Municipality specifically identifies the site under investigation.

<p>2.2.Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area?</p> <p>2.2.1. Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?</p>	<p>The addition of a cemetery to the Plettenberg Bay area will provide some much-needed relief as existing cemeteries are either at capacity or nearing full capacity. Cemeteries are important in a community as burials form part of religious and cultural norms.</p>
<p>2.3.How will this development address the specific physical, psychological, developmental, cultural and social needs and interests of the relevant communities?</p>	<p>As stated in point 2.2</p>
<p>2.4.Will the development result in equitable (intra- and inter-generational) impact distribution, in the short- and longterm?</p> <p>Will the impact be socially and economically sustainable in the short- and long-term?</p>	<p>The DFFE Need and Desirability Guideline (2014) defines intra- and intergenerational equity as ensuring that development is sustainable enough to ensure that the needs of the present generation are met without compromising the ability of future generations to meet their own needs. On condition that the recommendations of the EAP and the appointed specialists are implemented, the development is sustainable in that it will not impede the ability to meet the needs of the present generation (intragenerational equity) or of future generations (intergenerational equity).</p>
<p>2.5. In terms of location, describe how the placement of the proposed development will:</p> <p>2.5.1. result in the creation of residential and employment opportunities in close proximity to or integrated with each other,</p> <p>2.5.2. reduce the need for transport of people and goods,</p> <p>2.5.3. result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport),</p>	<p>2.5.1 Employment opportunities will be available for the local community during both the construction and operational phases. Residential opportunities will arise when the housing development set for the adjacent property is initiated by the municipality.</p> <p>N/A</p> <p>N/A</p>

<p>2.5.4. compliment other uses in the area,</p>	<p>N/A</p>
<p>2.5.5. be in line with the planning for the area,</p>	<p>2.5.5 As previously mentioned, this is a municipal lead development.</p>
<p>2.5.6. for urban related development, make use of underutilised land available with the urban edge,</p>	<p>2.5.6 Currently the land is left vacant and is being misused by the public for illegal dumping.</p>
<p>2.5.7. optimise the use of existing resources and infrastructure,</p>	<p>N/A</p>
<p>2.5.8. opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement),</p>	<p>N/A</p>
<p>2.5.9. discourage "urban sprawl" and contribute to compaction/densification,</p>	<p>N/A</p>
<p>2.5.10. contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs,</p>	<p>N/A</p>
<p>2.5.11. encourage environmentally sustainable land development practices and processes,</p>	<p>On condition that the recommendations of the EAP and the appointed specialists are implemented, the development is sustainable in that it will not impede the ability to meet the needs of the present generation (intragenerational equity) or of future generations (intergenerational equity).</p>
<p>2.5.12. take into account special locational factors that might favour the specific location (e.g. the location of a strategic mineral resource, access to the port, access to rail, etc.),</p>	<p>There are not many "ideal" locations for the cemetery to be placed within the municipality. Environmental and social impacts have been taken into account and the best location has been chosen.</p>

<p>2.5.13. the investment in the settlement or area in question will generate the highest socio-economic returns (i.e. an area with high economic potential),</p> <p>2.5.14. impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area, and</p> <p>2.5.15. in terms of the nature, scale and location of the development promote or act as a catalyst to create a more integrated settlement?</p>	<p>N/A</p> <p>2.5.14 The site inspection identified no heritage resources and it is not expected that the proposed development will have an impact on heritage resources or the heritage value of the area. The proposed development site is not visible from the N2 (Figures 5 & 6). Nevertheless, there are no heritage resources on 33/437 that will be visually impacted by the proposed development. Consequently, from a heritage standpoint, the scenic route will not be negatively impacted by the proposed development.</p> <p>Furthermore, since there are no significant heritage resources or features associated with 33/437 or the proposed development footprint, the proposed activity will have a negligible to no impact on the existing cultural landscape of the area.</p> <p>N/A</p>
<p>2.6. How were a risk-averse and cautious approach applied in terms of socio-economic impacts?:</p> <p>2.6.1. What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?</p> <p>2.6.2. What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities,</p>	<p>As stated in Section 1.8 of this document, a risk-averse and cautious approach was applied in the impacts that were identified as a result of the proposed development. The mitigation measures provided also indicate the implementation of a risk-averse approach in order to avoid significantly negative impacts on the surrounding environment.</p> <p><i>The EAP</i> assumes that information gathered from the applicant and specialists is accurate and adequate for the assessment of potential impacts that may arise from the proposed development. It is also assumed that all mitigation, management, and monitoring measures prescribed in the BAR and the accompanying EMPr will be implemented by the proponent. There are no significant gaps in knowledge.</p> <p>No levels of risk are identified as it is assumed that all mitigation measures and recommendations will be implemented by the proponent and any persons working for the proponent, thereby acceptably</p>

<p>critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge?</p> <p>2.6.3. Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?</p>	<p>decreasing the significance of all identified potential impacts.</p> <p>The scale and nature of the development, and the fact that socio-economic impacts are anticipated to be minimal while negative biophysical impacts are able to be mitigated to acceptable levels, means that any limitation in knowledge is acceptable and does not pose a risk. Nevertheless, a risk averse approach was applied to the development in the assessment and identification of impacts.</p>
<p>2.7.How will the socio-economic impacts resulting from this development impact on people's environmental right in terms following:</p> <p>2.7.1. Negative impacts: e.g. health (e.g. HIV-Aids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</p> <p>2.7.2. Positive impacts. What measures were taken to enhance positive impacts?</p>	<p>The proposed development will result in minimal socio-economic impacts as long as mitigation measures are imposed during both the construction and operational phase. The EMPr must be strictly enforced.</p> <p>The only impacts which may result from the facility is during the construction phase when there may be safety risks to the employees. The EMPr has addressed negative socio-economic impacts; however, negative socio-economic impacts must be addressed and mitigated through an appointed Health and Safety officer.</p> <p>The design of the cemetery provides multiple uses for community members to conduct funeral services at the cemetery site. In addition, the area for Private Open Space can be utilised to incorporate recreational activities such as hiking and biking trails.</p>
<p>2.8.Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socioeconomic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)?</p>	<p>Positive impacts on human wellbeing as a result of the development are anticipated to outweigh the negative impacts on ecosystem services of which will be temporary, and through mitigation will be minimized.</p>
<p>2.9.What measures were taken to pursue the selection of the "best practicable environmental option" in terms of socio-economic considerations?</p>	<p>The best practicable socio-economic considerations are directly linked to the best practicable environmental considerations in this case. Section 23 of NEMA was applied to ensure integrated environmental management.</p>
<p>2.10. What measures were taken to pursue environmental justice</p>	<p>No adverse environmental impacts are expected to be distributed in such a manner as to unfairly</p>

<p>so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)?</p> <p>Considering the need for social equity and justice, do the alternatives identified, allow the "best practicable environmental option" to be selected, or is there a need for other alternatives to be considered?</p> <p>2.11. What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?</p>	<p>discriminate against any person. As discussed previously, the pollution of groundwater as a highly probable negative impact must be seriously addressed by the developer. The mitigation measures of the geohydrologist must be implemented. Where additional mitigation measures are required to ensure the safety of the community, the relevant specialist must be appointed to instruct the construction team.</p>
<p>2.12. What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle?</p>	<p>An EMPr has been compiled for the development, providing mitigation measures provided by relevant specialists to be taken to ensure that the environmental health and safety consequences of the development are adequately addressed during the construction and operational phases. The mitigation measures provided by specialists are representative of the measures that have been taken to ensure that the responsibility for the environmental health and safety consequences are addressed.</p> <p>Where additional mitigation measures are required to ensure the safety of the community, the relevant specialist must be appointed to instruct the construction team.</p>
<p>2.13. What measures were taken to:</p> <p>2.13.1. ensure the participation of all interested and affected parties,</p> <p>2.13.2. provide all people with an opportunity to develop the understanding, skills and</p>	<p>The Public Participation Process will be undertaken as part of the Basic Assessment is detailed in section C of the BAR.</p> <p>Comprehensive public participation measures will be employed to ensure an equal opportunity for all potential Interested and Affected Parties (I&APs) to participate and comment, including vulnerable and disadvantaged persons, regardless of understanding, skills and capacity.</p>

capacity necessary for achieving equitable and effective participation,

2.13.3. ensure participation by vulnerable and disadvantaged persons

For the first iteration of Public Participation the draft BAR will be made available to the broader public, identified I&APs and Organs of State for their perusal and comment by the following means:

- A media notice inviting members of the public to provide comment on the BAR.
- Site notices will be placed in conspicuous locations around the site.
- An electronic copy of the BAR will be placed on The EAP's website and circulated to registered I&APs.
- A hardcopy will be supplied to the local New Horizons public library for I&APs without access to internet.
- Notification letters will be circulated via email and post to all registered I&APs outlining the process to be followed for the proposed activity.

The Public Participation Process will be undertaken in accordance with this plan to ensure that all interested and affected parties can participate, regardless of their understanding, skill, or any potential disadvantage.

2.13.4. promote community wellbeing and empowerment through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means,

As stated in the EMPr (Appendix H), training and environmental awareness is fundamental to the successful implementation of the EMPr and to the protection of the environment. Therefore, all personnel whose work may result in an impact on the environment must receive appropriate training on the environmental procedures to be followed. These measures will raise environmental awareness and thereby contribute to community wellbeing by decreasing environmental degradation of the area.

2.13.5. ensure openness and transparency, and access to information in terms of the process,

To ensure transparency, all specialist information is attached to the BAR. The public will be notified that their comments will be addressed and that they will be able to view their comments with responses in the next circulated version of the BAR.

2.13.6. ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge, and

Every written comment received will be addressed and considered, and where necessary, changes will be made to the development proposal. In this way, the public participation process will take cognisance of the interests, needs and values expressed by all I&APs based on all forms of knowledge.

2.13.7. ensure that the vital role of women and youth in

Participation by all I&APs, including women and youth, will be promoted and opportunities for engagement

<p>environmental management and development were recognised and their full participation therein were be promoted?</p>	<p>will be provided during the environmental assessment process. All written comments received from Interested and Affected Parties will be given due consideration and will be addressed. No Interested and Affected Parties will be discriminated against based on their gender or age or any other factor.</p>
<p>2.14. Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community (e.g.. a mixture of low-, middle-, and high-income housing opportunities) that is consistent with the priority needs of the local area (or that is proportional to the needs of an area)?</p>	<p>It is anticipated that construction phase employment will provide opportunities primarily for low-income individuals. As stated in Section 2.10 of this document, it is recommended by the EAP that the project manager include a clause in the tender conditions of the contract for the construction of the facility so that provision is made for a certain percentage of employment opportunities to be solely for previously disadvantaged individuals.</p>
<p>2.15. What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected?</p>	<p>An EMPr (Appendix H) has been compiled which details the potential impacts of the proposed development. The EMPr also specifies the extent to which workers will be informed of the work to be undertaken. For example, the EMPr states that contractors shall make allowance for site staff to attend an initial environmental awareness training session of approximately one (1) hour. Also, the Contractor shall ensure that all new staff attend an environmental awareness training session within five working days of commencement of work on the site. In addition to the environmental awareness programme included in the EMPr, health and safety concerns will also be addressed by the implementation of occupational health and safety legislation. An Environmental Control Officer will be appointed to monitor compliance.</p>
<p>2.16. Describe how the development will impact on job creation in terms of, amongst other aspects:</p> <p>2.16.1. the number of temporary versus permanent jobs that will be created</p> <p>2.16.2. whether the labour available in the area will be able to take up the job opportunities (i.e. do the required skills match the skills available in the area)</p>	<p>The proposed development will result in job creation during the construction phase and operation phase.</p> <p>It is unknown at this stage as to the quantity of temporary vs permanent jobs that will be created.</p> <p>During the construction phase, labour available in the area will be able to take up the job opportunities as their skills are highly likely to be sufficient to match those needed for the construction phase.</p> <p>Impacts will be local and primarily low in significance. Job creation during the construction and operation phases is also anticipated to be primarily local. It is thus considered that the distribution of costs and benefits will be relatively equitable.</p>

<p>2.16.3. the distance from where labourers will have to travel</p> <p>2.16.4. the location of jobs opportunities versus the location of impacts (i.e. equitable distribution of costs and benefits)</p> <p>2.16.5. <i>the opportunity costs in terms of job creation (e.g. a mine might create 100 jobs, but impact on 1000 agricultural jobs, etc.)</i></p>	<p>No opportunity costs are anticipated if the authorisation is not granted.</p>
<p>2.17. What measures were taken to ensure:</p> <p>2.17.1. that there were intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment</p> <p>2.17.2. that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?</p>	<p>The Basic Assessment Process considered all legislation and policy applicable to the activity. The relevant Competent Authorities have been identified and all form part of the Public Participation Process.</p> <p>All comments received in the Public Participation Processes will be dealt with fairly and according to the law.</p>
<p>2.18. What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people's common heritage</p>	<p>Mitigation measures provided will ensure that negative impacts on the environment will be circumvented. In addition, the Public Participation Process provides a transparent process whereby the comments of all I&APs are addressed.</p>
<p>2.19. Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?</p>	<p>The mitigation measures provided are realistic. No long-term environmental burden is expected.</p>
<p>2.20. What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further</p>	<p>The Polluter Pays principle will be upheld for the proposed activity. This has been clearly stipulated in the EMPr.</p>

<p>pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment?</p>	
<p>2.21 Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations?</p>	<p>The best practicable socio-economic considerations are directly linked to the best practicable environmental considerations in this case. Section 23 of NEMA was applied to ensure integrated environmental management.</p>
<p>2.22. Describe the positive and negative cumulative socio-economic impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and other planned developments in the area?</p>	<p>Previously discussed.</p>