



**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



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THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.**

APRIL 2024

(For official use only)	
Pre-application Reference Number (if applicable):	16/3/3/6/7/1/D6/29/0075/21
EIA Application Reference Number:	16/3/3/1/D6/29/0031/24
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 LIGHT INDUSTRIAL DEVELOPMENT (STORAGE FACILITY) ON PORTION A OF ERF 21277
AALWYNDAL, MOSSEL BAY MUNICIPALITY, WESTERN CAPE**

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

1. **The purpose** of this template is to provide a format for the Basic Assessment report as set out in Appendix 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in order to ultimately obtain Environmental Authorisation.
2. The Environmental Impact Assessment ("EIA") Regulations is defined in terms of Chapter 5 of the National Environmental Management Act, 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

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

DEADPEIAAdmin.George@westerncape.gov.za

Directorate: Development Management (Region 3):
Garden Route District Municipal area and Central Karoo District Municipal area

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

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

4. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.
5. All applicable sections of this BAR must be completed.
6. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.
7. This BAR is current as of **April 2024**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at <http://www.westerncape.gov.za> to check for the latest version of this BAR.
8. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an environmental authorisation in terms of the NEMA EIA Regulations

when the Western Cape Government Department of Environmental Affairs and Development Planning ("DEA&DP") is the Competent Authority.

9. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.
10. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.
11. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.
12. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"), the "One Environmental System" is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department's Circular EADP 0028/2014: One Environmental Management System.
13. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA") is triggered, a copy of Heritage Western Cape's final comment must be attached to the BAR.
14. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link <https://screening.environment.gov.za/screeningtool> to generate the Screening Tool Report. The screening tool report must be attached to this BAR.
15. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA'), the submission of the Report must also be made as follows, for-
Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

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

DEPARTMENTAL DETAILS

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

MAPS

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

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

ACRONYMS

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

ATTACHMENTS

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

The following checklist of attachments must be completed.

APPENDIX			✓ (Tick) or x (cross)
Appendix A:	Maps		
	Appendix A1:	Locality Map	✓
	Appendix A2:	Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning	N/A
	Appendix A3:	Map with the GPS co-ordinates for linear activities	N/A
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	N/A
	Appendix E4:	Comment from the DEA: Oceans and Coast	N/A
	Appendix E5:	Comment from the DAFF	N/A
	Appendix E6:	Comment from WCG: Transport and Public Works	N/A
	Appendix E7:	Comment from WCG: DoA	✓
	Appendix E8:	Comment from WCG: DHS	N/A
	Appendix E9:	Comment from WCG: DoH	N/A

	Appendix E10:	Comment from DEA&DP: Pollution Management	N/A
	Appendix E11:	Comment from DEA&DP: Waste Management	N/A
	Appendix E12:	Comment from DEA&DP: Biodiversity	✓
	Appendix E13:	Comment from DEA&DP: Air Quality	N/A
	Appendix E14:	Comment from DEA&DP: Coastal Management	N/A
	Appendix E15:	Comment from the local authority	✓
	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	N/A
	Appendix E19:	Pre-approval for the reclamation of land	N/A
	Appendix E20:	Proof of agreement/TOR of the specialist studies conducted.	✓
	Appendix E21:	Proof of land use rights	✓
	Appendix E22:	Proof of public participation agreement for linear activities	N/A
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.....	Any other attachments must be included as subsequent appendices		N/A

SECTION A: ADMINISTRATIVE DETAILS

	CAPE TOWN OFFICE: REGION 1		GEORGE OFFICE: REGION 3
Highlight the Departmental Region in which the intended application will fall	(City of Cape Town, West Coast District)	(Cape Winelands District & Overberg District)	(Central Karoo District & Garden Route District)
Duplicate this section where there is more than one Proponent	Dream Supreme Properties 14 cc		
Name of Applicant/Proponent:	Nicolaas Christiaan Badenhorst		
Name of contact person for Applicant/Proponent (if other):			
Company/ Trading name/State Department/Organ of State:			
Company Registration Number:	2001/076486/23		
Postal address:	PO Box 834, Hartenbos		
	Postal code: 6520		
Telephone:	()	Cell: +27(0)827820533	
E-mail:	nbaden@lantic.net		Fax: ()
Company of EAP:	Kapp Environmental Consultants (Pty) Ltd		
EAP name:	Renier Kapp		
Postal address:	9 Wassung Street, Mossel Bay		
	Postal code: 6506		
Telephone:	()	Cell: +27(0) 82 675 5233	
E-mail:	renier@kappec.co.za		Fax: ()
Qualifications:	B. Environmental Management, US (2007). Renier Kapp Completed training courses in terms of the National Environmental Management Act (NEMA) (Act 107 of 1998), as amended and the National Environmental Management: Waste Act (NEM:WA) (Act 59 of 2008)		
EAP registration no:	Not applicable. Regulation 21 Transitional Arrangements.		
Duplicate this section where there is more than one landowner	Same as proponent		
Name of landowner:			
Name of contact person for landowner (if other):			
Postal address:			
	Postal code:		
Telephone:	()	Cell:	
E-mail:			Fax: ()
Name of Person in control of the land:	Same as proponent		
Name of contact person for person in control of the land:			
Postal address:			
	Postal code:		
Telephone:	()	Cell:	
E-mail:			Fax: ()
Duplicate this section where there is more than one Municipal Jurisdiction	Mossel Bay Municipality		
Municipality in whose area of jurisdiction the proposed activity will fall:			
Contact person:	Rudi Minnie (Assistant Conservation Officer)		
Postal address:	101 Marsh Street, Mossel Bay		
	Postal code: 6506		
Telephone:	+27(0) 44 606 5163		Cell:
E-mail:	rminnie@mosselbay.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.				
A greenfield site is defined as "an area of land, that has never had development on it before" (Cambridge Dictionary). There is no infrastructure present on the development site, and the site is currently being used for livestock grazing, therefore, the portion to be developed as part of this application is thus a greenfield development.					
3.	For Linear activities or developments				
3.1.	Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:				
3.2.	Development footprint of the proposed development for all alternatives.				—m ²
3.3.	Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.				
3.4.	Indicate how access to the proposed routes will be obtained for all alternatives.				
3.5.	SG—Digit codes—of the Farms/Farm Portions/Erf numbers for all alternatives				
3.6.	Starting point co-ordinates for all alternatives				
	Latitude (S)	°	'	"	
	Longitude (E)	°	'	"	
	Middle point co-ordinates for all alternatives				
	Latitude (S)	°	'	"	
	Longitude (E)	°	'	"	
	End point co-ordinates for all alternatives				
	Latitude (S)	°	'	"	
	Longitude (E)	°	'	"	
Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.					
4.	Other developments				
4.1.	Property size(s) of all proposed site(s):				m ²
The proposed development area is located in the area known as Aalwyndal, situated to the west of Voorbaai. This area is characterized by smallholdings of approximately 7 Ha in size and is currently zoned Residential Zone I. Erf 21277, Aalwyndal, Mossel Bay, is approximately 7.7 hectares in extent and is situated on Nagtegaal Street.					
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):				N/A
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:				m ²
No construction activities at the proposed development site have commenced as of yet. The total extent of Portion A of erf 21277 is 14 400m², the proposed development footprint is set out to be 8 562m².					

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).

An application has been filed for the establishment of a storage facility on Portion A of Erf 21277 in Aalwyndal, Mossel Bay. The proposed development site is situated in the Aalwyndal area, west of Voorbaai. Aalwyndal is recognized for its smallholdings, each approximately 7.7 hectares in size, and is presently zoned as Single Residential Zone I.



Figure 1: Locality map of Portion A of Erf 21277

The total extent of Erf 21277, Aalwyndal, Mossel Bay, is approximately 7.7 hectares in extent and is situated along Nagtegaal Street. The property is currently zoned Single Residential Zone 1 and will be subdivided as part of the application. The development is proposed on Portion A which comprises 1.44ha along Nagtegaal Street and will be rezoned from Single Residential Zone 1 to Industrial Zone 1 (light industry) in line with the Spatial Development Framework for the Aalwyndal precinct to accommodate the proposed self-storage facility. The development herewith applied for on Portion A includes the following components and has been proposed to be developed in two phases:

Phase 1 of the development will entail the development of 228 small self-storage units allocated in four separate blocks with varying building dimensions and unit sizes.

Block 1: Comprising of 42 storage units (3m x 6m).

Block 2: Comprising of 12 storage units (3m x 9m) as well as 1 storage units (5.6m x 9m).

Block 3: Comprising of 35 storage units (3m x 4m) as well as 35 storage units (3m x 7m), thus 70 units in total.

Block 4: Comprising of 33 storage units of (3m x 7.8m); 35 storage units of (3m x 3m); as well as 35 storage units of (3m x 4m).

The total development footprint of phase 1 is proposed to be approximately 4281m². Additionally, an office/toilet structure will be developed comprising of a 38m² footprint.

Phase 2 of the development will entail the development of another 228 small self-storage units allocated in four separate blocks with building dimensions and unit sizes.

Block 5: Comprising of 42 storage units (3m x 6m).

Block 6: Comprising of 12 storage units (3m x 9m) as well as 1 storage units (5.6m x 9m).

Block 7: Comprising of 35 storage units (3m x 4m) as well as 35 storage units (3m x 7m), thus 70 units in total.

Block 8: Comprising of 33 storage units of (3m x 7.8m); 35 storage units of (3m x 3m); as well as 35 storage units of (3m x 4m).

The total development footprint of phase 2 is proposed to be approximately 4281m². Additionally, an office/toilet structure will be developed comprising of a 38m² footprint.

In total, the proposed development will consist of 456 small self-storage units and a development area of 8562 m².

It is proposed that the administration office and toilet facility will be connected to a conservancy tank and the existing water line along Nagtegaal Street will supply the required potable water.

Furthermore, as per the Preferred Site Development Plan (AD21277/2023 dated 21 January 2024) 75 parking bays are required and 76 shaded parking bays have been provided for. One parking bay will be distributed and constructed per 100 m² of self-storage units.

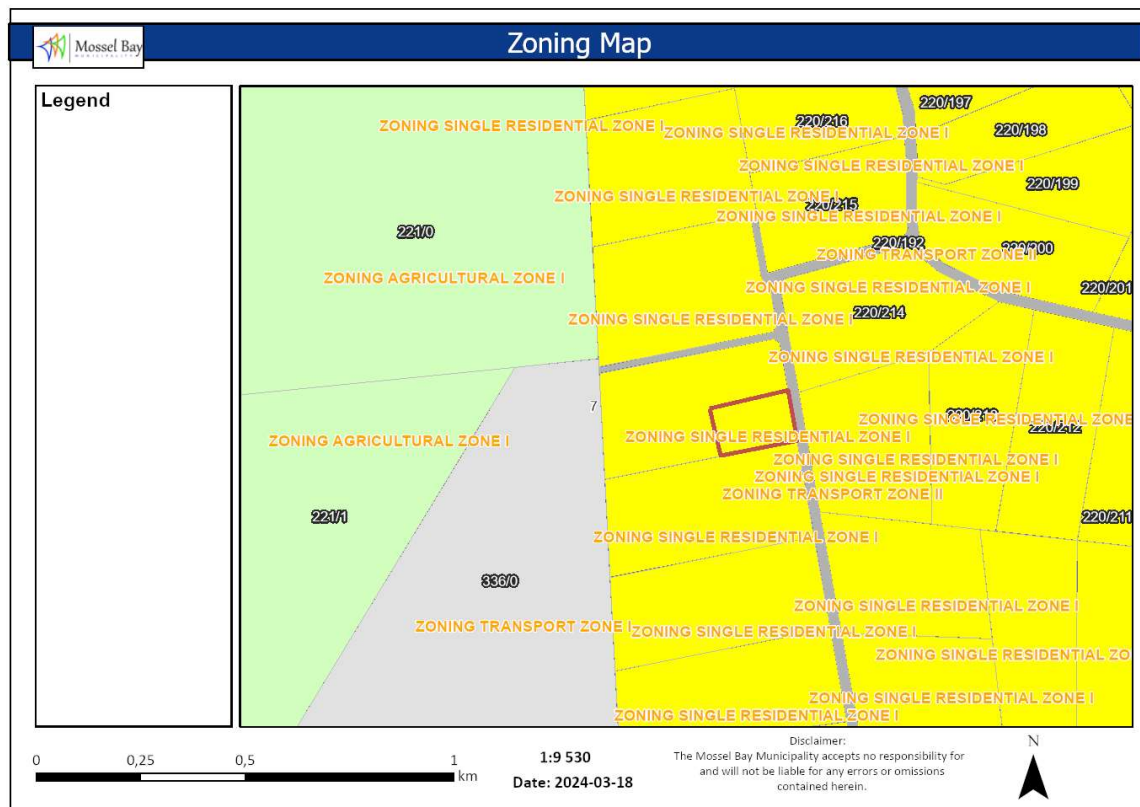


Figure 2a: Depicts the zoning of the proposed development site.

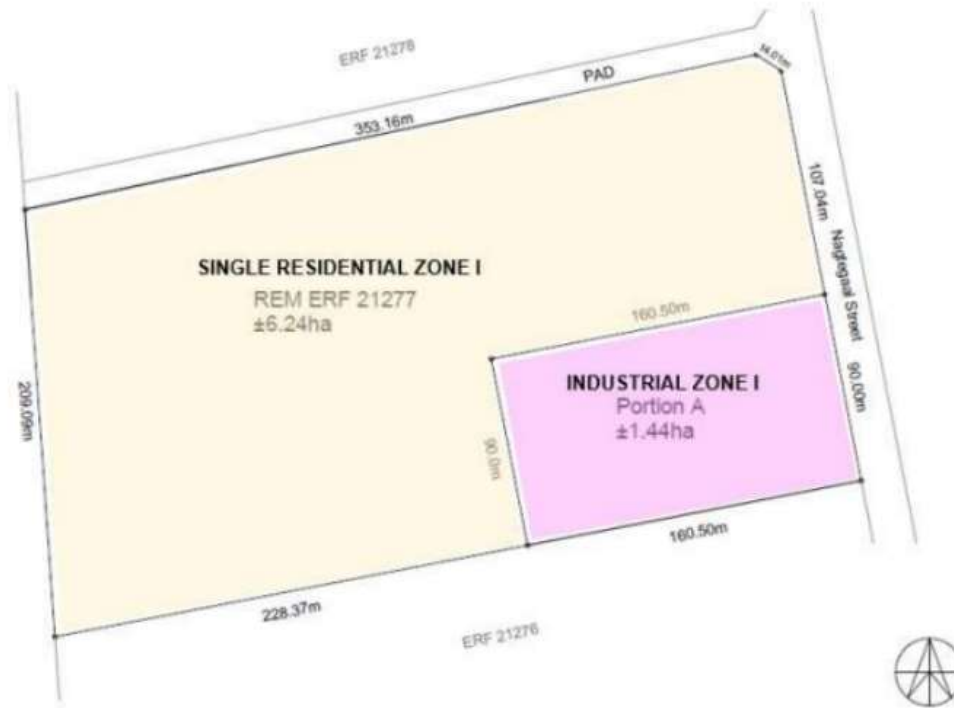


Figure 2b: Depicts the rezoning of the proposed development site.



Figure 3: Proposed site development plan

The development will also include access roadways, stormwater run-off drainage and perimeter security fencing, lighting, and access control. Additionally, the proposed development will also consist of private internal access roads and civil infrastructure utilizing a Conservancy Tank System.

The entrance and exit to the proposed development are located on Nagtegaal Street as indicated on the site plan. Parking bays have been positioned along the southeastern and northwestern boundary of the site to set the buildings back from the road interface and minimise visual intrusion.

The development will also include access roadways, stormwater run-off drainage and perimeter security fencing and lighting and access control.

The need for water, electricity and sewerage disposal is very limited due to the nature of the development proposal. A conservancy tank is proposed for the toilet facility of the administrative office building, to be serviced by a private contractor as the need occurs. A water connection is available for the basins and the toilet. Electricity connections are also readily available.

In terms of the Mossel Bay Spatial Development Framework (2017) the property falls within the urban edge, within which development proposals will be considered. A further study, The Aalwyndal Precinct Plan, was completed in 2018 to guide future development in Aalwyndal. This area has been earmarked for intensified urban development that will include plans to enlarge the present Mossel Bay Airfield. Erf 21277, Mossel Bay, is situated within the area where noise levels are considered unsuitable for residential purposes and has been identified as suitable for commercial development, including services related to the Airfield such as storage.

Need and desirability is the balancing of various factors from a town planning perspective.

Need depends on the nature of a development proposal. E.g. need for urban development cannot be compared with the need for development in a rural environment. The provision of storage remains a challenge in Mossel Bay considering its growth. An investor experienced the need and is in the position to make this storage facility in accordance with the spatial planning for Aalwyndal, a reality.

Desirability in turn is defined as the degree of acceptability of a proposed development on a property. The relevant factors include the physical characteristics of the property, existing planning in the area, character of

the area, the locality and accessibility of the property as well as the provision of services. Another important consideration is the economic or financial impact which is only positive in this instance.

Physical characteristics of the property

Erf 21277, Mossel Bay is an existing urban property developed with a dwelling and structures needed for the horses accommodated on the property. The property is level and therefore the physical characteristics is suitable for construction.

Existing planning in the area

The proposed land use application is not in conflict with any relevant spatial plan applicable to the subject property.

Character of the area

Aalwyndal is a small holding area expected to change to a vibrant urban area with residential and commercial opportunities to develop. The Mossel Bay Airfield has played a significant role in the development proposals for this area. This land use application for Erf 21277, Mossel Bay responds to the character proposed for the greater Aalwyndal.

<u>Provision of services</u>																					
The need for municipal services is limited due to the nature of the development proposal for Portion A.																					
<u>Economic impact</u>																					
This development proposal cannot have a negative economic impact as it is in accordance with the spatial planning for the area which considers economic benefit.																					
<u>Direct impact on surrounding properties</u>																					
No neighbour will be overshadowed or overlooked. The area where Erf 21277, Mossel Bay is located (within the 55RDln noise contour) is expected to develop with similar land uses.																					
4.5.	Indicate how access to the proposed site(s) will be obtained for all alternatives.																				
The entrance and exit to the proposed development are located on Nagtegaal Street as indicated on the site plan. Parking bays have been positioned along the southeastern and northwestern boundary of the site to set the buildings back from the road interface and minimise visual intrusion.																					
4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	5	1	0	0	0	7	0	0	0	2	1	2	7	7	0	0	0	0
4.7.	Coordinates of the proposed site(s) for all alternatives:																				
	Latitude (S)								34°				09'				07.2"				
	Longitude (E)								22°				03'				58.2"				

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 Environmental Management Act (Act No. 107 of 1998) EIA Regulations (2014) - Western Cape Land Use Planning Act Regulations, 2015 - Government Notice 509 as published in the Government Gazette 40229 of 2016 as it relates to the National Water Act, 1998 (Act No. 36 of 1998)

- National Building Regulations and Building Standards Act, Act 103 of 1977 and the National Building Regulations as published under GN 1985/R441

4. Policies

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

National Level Policies

National Development Plan 2030

The National Development Plan 2030 (South African Government, 2010) strives to eradicate poverty and address inequality while at the same time fostering economic growth. To achieve this, the National Development Plan 2030 stated that government ought to establish an enabling environment for higher levels of public and private investment to create jobs and ensure increasing income levels. In addition, the National Development Plan 2030 aims to create 11 million jobs by 2030 through raising exports and competitiveness. In the short-term, the economy is expected to create jobs specifically for young and low-skilled South Africans, who dominate the unemployed. South Africa can realise these goals by drawing on the energies of its people, growing an inclusive economy, building capabilities, enhancing the capacity of the state, and promoting leadership and partnerships throughout society. Given the complexity of national development, the plan sets out six interlinked priorities:

- Uniting all South Africans around a common programme to achieve prosperity and equity;
- Promoting active citizenry to strengthen development, democracy and accountability;
- Bringing about faster economic growth, higher investment and greater labour absorption;
- Focusing on key capabilities of people and the state;
- Building a capable and developmental state; and
- Encouraging strong leadership throughout society to work together to solve problems.

The proposed storage development will have a positive socio-economic impact in providing employment opportunities during both the constructional and operational phase, both in terms of running the facility and in terms of the business that will be able to operate from the facility. The access and use of storage is also a common requirement in modern society and this has been identified by the proponent as a need in the area. These are clear economic and social benefits which fall within the National Development plan to achieve economic growth and increase public and private investments for job creation in the area.

National Environmental Management Act (Act 107 of 1998)

The National Environmental Management Act (Act No. 107 of 1998) (South African Government, 1998) aims to provide for co-operative environmental governance by establishing principles for decision-making on matters affecting the environment. The law develops a framework for integrating good environmental management into all development activities. The social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment.

During the site visit and investigation the Botanical impact assessment indicated that the site has been severely disturbed and that the impacts from a Botanical perspective will be low. Given the disturbed state of the site a low to moderate impact on vegetation and conservation status is observed. The impact will be slightly more for the encountered Species of Conservation Concern, which are mostly still well represented in the larger Mossel Bay area. Mitigation measures for search, rescue and relocation of identified Species of Conservation Concern have been suggested (if development is allowed to proceed), which will limit any environmental implications to the proposed development site.

A Freshwater Compliance Statement was also conducted to inform the development. The investigation confirmed the presence of a natural Channelled Valley-Bottom (CVB) Wetland Area associated with a Non-Perennial Drainage Line situated approximately 420 metres northeast of the proposed development footprint. No aquatic resources were discovered on the concerned portion of Erf 21277.

Draft National Spatial Development Framework 2018

The National Spatial Development Framework 2018 aims to guide planning and development across all sectors of the national government. In addition, it aims to contribute to a coherent planned approach to spatial development in the three spheres of government; and to provide clear and accessible information to the public and private sector, and provide direction for investment purposes (Draft National Spatial Development Framework, 2018). Moreover, the National Spatial Development Framework 2018 strives to include previously disadvantaged areas, areas under traditional leadership, rural areas, informal settlements, slums and landholdings of state-owned enterprises and government agencies, and address their inclusion and integration into the spatial, economic, social and environmental objectives of the national government (Draft National Spatial Development Framework, 2018). Future settlement and economic development opportunities should be channelled into activity corridors and nodes that are adjacent to or that link the main growth centres. Areas with demonstrated economic potential provide greater livelihood and income protection because of a greater diversity of income sources and overcoming poverty.

The proposed storage development will have a positive socio-economic impact in providing employment opportunities during both the constructional and operational phase, both in terms of running the facility and in terms of the business that will be able to operate from the facility. The access and use of storage is also a common requirement in modern society, and this has been identified by the proponent as a need in the area. These are clear economic and social benefit which fall within the National Development plan to achieve economic growth and increase public and private investments for job creation in the area.

Local Level Policies

The Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013) (SPLUMA) introduced legislative and procedural changes to the management of land use planning in South Africa. The Western Cape Province followed with the Land Use Planning Act (Act 3 of 2014) and thereafter Mossel Bay Municipality with the By-law on Municipal Land Use Planning By-law (2015). Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013) (SPLUMA) Section 7 of this Act sets out the five development principles that are applicable to spatial planning, land development and land use management.

Section 42 of SPLUMA then refers to the factors that must be considered by a municipal tribunal when considering a land use planning application, which include but are not limited to: □

- Five SPLUMA development principles;
- Public interest;
- Constitutional transformation;
- Respective rights and obligations of all those affected;
- State and impact of engineering services, social infrastructure and open space requirements;
- Compliance with environmental legislation.

Spatial justice as described in Section 7(a) of SPLUMA is not relevant to this land use application – only as far as much needed employment opportunities that will be created during the construction and to some extent operational phase.

Spatial sustainability as described in Section 7(b) of SPLUMA is relevant as a property will be used in accordance with its potential considering location and the spatial planning for the area.

Currently Erf 21277 is used as a horse paddock and for grazing with surrounding erven functioning in agricultural and residential purposes. The agricultural land is essentially not affected by this land use application as Portion A is already zoned Single Residential Zone I and situated well within the urban edge.

The effective and equitable functioning of land markets is not negatively affected by this land use application. It is stated that all current and future costs to all parties for the provision of infrastructure and social services in land developments must be considered. This land use application will not increase costs to the Municipality but rather increase revenue.

It is further stated in this section of SPLUMA that land development in locations that are sustainable and that limits urban sprawl, must be promoted. This development proposal for the subject property supports this principle. This development proposal is not expected to impact not negatively on the Aalwyndal community.

Efficiency as described in Section 7(c) of SPLUMA is supported. This development proposal for Erf 21277, Mossel Bay will not have a negative impact on existing resources and infrastructure available to the area.

This proposed development does not have a negative impact regarding financial, social, economic or environmental considerations for the relevant authorities. The proposed storage units are a quiet land use with varying intensity. It responds to the spatial planning for Aalwyndal all residents have been part of.

Land Use Planning Act (Act 3 of 2014) (LUPA)

LUPA requires that local municipalities consider the following when deciding on land use applications:

- Applicable spatial development frameworks;
- Applicable structure plans;
- Land use planning principles referred to in Chapter VI (Section 59) which is an expansion of the five development principles of SPLUMA;
- Desirability of the proposed land use; and
- Guidelines that may be issued by the Provincial Minister regarding the desirability of proposed land use.

Section 19(1) and (2) of LUPA refers to consistency and compliance of a land use proposal regarding spatial development frameworks or structure plans:

(1) If a spatial development framework or structure plan specifically provides for the utilisation or development of land as proposed in a land use application or a land development application, the proposed utilisation or development is regarded as complying with that spatial development framework or structure plan;

(2) If a spatial development framework or structure plan does not specifically provide for the utilisation or development of land as proposed in a land use application or a land development application, but the proposed utilisation or development is not conflict with the purpose of the relevant designation in the spatial development framework or structure

plan, the utilisation or development is regarded as being consistent with that spatial development framework or structure plan.

Section 19(3) of LUPA states the following:

(2) If the proposed utilisation or development of land in a land use application or a land development application does not comply with and is not consistent with the relevant designation for the utilisation of land

in an applicable spatial development framework or structure plan, the proposed utilisation or development deviates from that spatial development framework or structure plan.

Mossel Bay Municipality: By-law on Municipal Land Use Planning (2015)

The general criteria for the consideration of applications in terms of this By-law are included in Section 65 which, inter alia, includes:

- Desirability of the proposed utilisation of land;
- Impact of the proposed land development on municipal engineering services;
- Integrated development plan, including the municipal spatial development framework, the applicable local spatial development framework and/or local structure plans;
- Relevant municipal policies;
- Western Cape Provincial Spatial Development Framework;
- Section 42 of SPLUMA (public interest, constitutionality);
- Land use planning principles transposed from LUPA; and
- Provisions of the applicable zoning scheme.

Land use description:

“storage facility” means an enterprise in which storage space also known as storage units are rented to tenants on a temporary basis.

Development parameters:

(a) The Municipality must require a site development plan for a storage facility;

(b) The site development plan as approved by the Municipality constitutes the development parameters in addition to the parking and accesses which must be provided on the land unit in accordance with this By-law apply.

According to the Municipal By-Law a minimum of 1 bay per 100m² GLA off-street parking is required.

Vehicular access to Portion A is proposed to be centrally along the new 90m boundary with Nagtegaal Street. The need for municipal services will be limited due to the nature of the development proposal.

Mossel Bay Spatial Development Framework (MSDF) (2018)

Erf 21277, Mossel Bay is located in Aalwyndal which underwent precinct planning. This current small holding area with the abutting Mossel Bay Airfield, has been identified as the next major development area for Mossel Bay according to the MSDF. The Mossel Bay Airfield has had a significant impact on the Aalwyndal area as confirmed with the Airport Investigation (2016).

The MSDF states that the Aalwyndal Precinct Plan should be used to guide development for the entire Aalwyndal area. This precinct plan shows how development should occur in Aalwyndal considering the impact of the airfield and the natural environment while preventing urban sprawl. The principles of maximizing development within the urban edge is critical for the MSDF. Therefore, no conflict between the development proposal for Erf 21277, Mossel Bay and the MSDF was found.

Aalwyndal Precinct Plan (APP) (2018)

The 2016 Mossel Bay Airport Investigation and Proposal for its future usage concluded that the Mossel Bay Airfield makes a significant contribution to the economy of Mossel Bay as well as employment creation. Then the Aalwyndal Precinct Plan followed to direct the spatial future considering the impact and opportunities found for this area. At the same time within the urban area of the greater Mossel Bay, Aalwyndal plays an important role to accommodate development, limit urban sprawl and therefore ensure compliance with the principles of the Spatial Planning & Land Use Management Act, 2013 (SPLUMA). Erf 21277, Mossel Bay is located in the 55RDln noise contour which represents a level where residential living is not desirable. The area of Aalwyndal within this noise contour is identified for commercial activities. Aalwyndal properties bordering onto

the eastern boundary of the Mossel Bay Airfield is then further qualified in the APP to be suitable for single storey airport related use, storage, etc. This proposal for Portion A of Erf 21277, Mossel Bay is then one of the first steps to create this commercial area which aims to become a viable economic hub. Below is an extract from the APP showing the location of Erf 21277, Mossel Bay and Portion A. This land use application complies with this precinct plan.

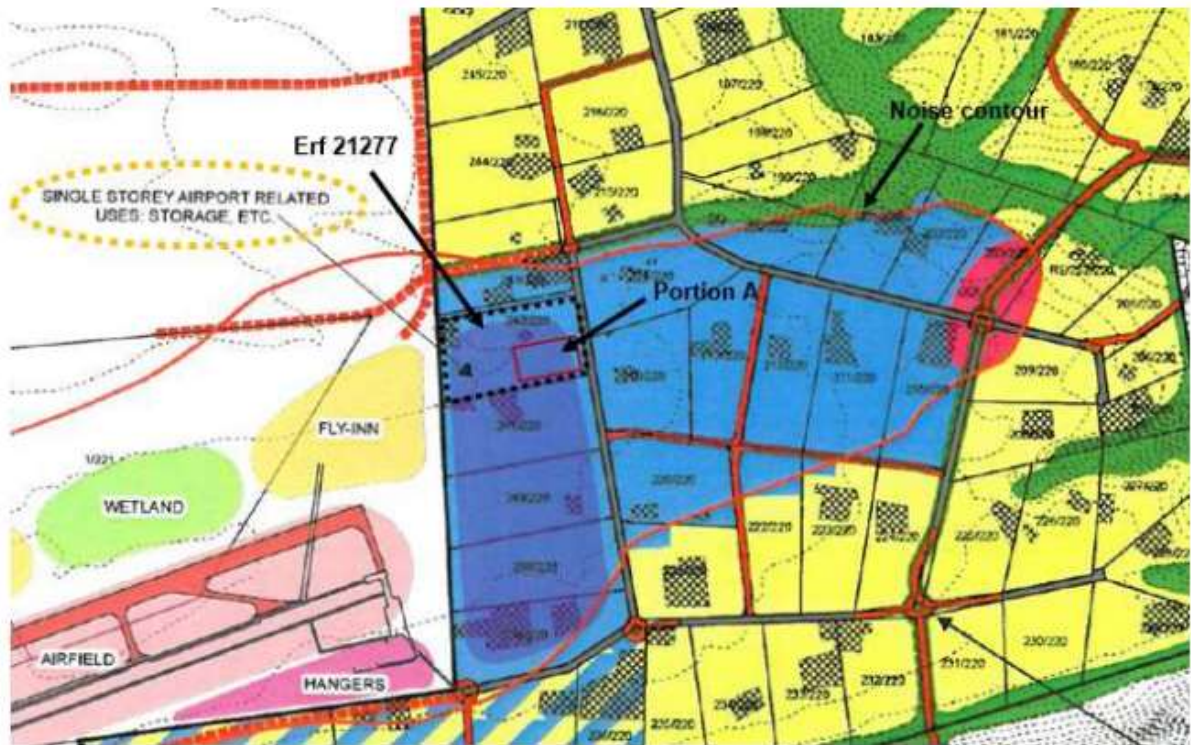


Figure 4: Extract from Aalwyndal Precinct Plan (APP) (2018), site of proposed development indicated.

In terms of the Mossel Bay Spatial Development Framework (2017) the property falls within the urban edge, within which development proposals will be considered. A further study, The Aalwyndal Precinct Plan, was completed in 2018 to guide future development in Aalwyndal. This area has been earmarked for intensified urban development that will include plans to enlarge the present Mossel Bay Airfield. Erf 21277, Mossel Bay, is situated within the area where noise levels are considered unsuitable for residential purposes and has been identified as suitable for commercial development, including services related to the Airfield such as storage.

According to the 'Evaluation of the development potential of the Aalwyndal area within the current legislative framework and applicable guide document context' which was concluded during December 2019, a biodiversity assessment was done for the subject area combining a vegetation assessment, a fresh water habitat assessment and also an ecological viability assessment. The botanical sensitivity map shows 4% very high sensitivity area, 55% high sensitivity areas and 40% medium/low sensitivity areas. Below is this sensitivity map with the proposed Portion A marked in black - it falls within the 40% medium / low sensitivity areas.



Figure 5: Botanical sensitivity map with the proposed Portion A marked in black.

Three development scenarios were evaluated with the botanical assessment as basis.

Scenario 1 will result in 66% destruction of environmentally sensitive areas which is 0.4% of natural vegetation in the entire Mossel Bay area. 80% of the area will be developed reducing the probability of urban sprawl significantly and 20% will remain open space. The NEMA principles will still in part be complied with and full compliance with the SPLUMA principles are ensured. All spatial planning for Mossel Bay will also be complied with.

Scenario 2 will create a fragmented urban structure with 60% open space (protected area) and 40% development area which. This will probably encourage future urban sprawl in Mossel Bay. Partial compliance with NEMA still applies, but the SPLUMA-principles cannot be complied with. This scenario creates conflict with the relevant spatial planning applicable to the area.

Scenario 3 finds a compromise between conservation of the environmentally sensitive areas for urban development in Aalwyndal. With this scenario 36% of the environmentally sensitive areas will be destroyed which is approximately 0.2% of the natural vegetation in the entire Mossel Bay area. It will still lead to a fragmented urban form and encourage future urban sprawl. As with the previous scenarios, the NEMA-principles will be partly complied with and compliance with the SPLUMA-principles is not possible. To compromise between conservation and development has a negative impact on yields and sustainability of the area.

To comply with the Spatial Planning and Land Use Management Act, 2013 (SPLUMA) as well as the spatial plans, Scenario 1 should be the way forward for Mossel Bay Municipality.

Mossel Bay Integrated Zoning Scheme By-law (MIZS) (2019)

Currently, Erf 21277 is zoned Single Residential Zone I. The land use application implies the rezoning and subdivision of Portion A of Erf 21277 to Industrial Zone I with the development of storage facilities for public and private use. The objective of this zone is to accommodate industry uses and service trades that may be carried out without nuisance to other properties or the general public. These uses may be located next to business uses

and in close proximity to residential areas, and do not present a potential negative impact on the character or amenity of such areas (Figure 2).

In terms of desirability Erf 21277, Mossel Bay is an existing urban property developed with a dwelling and structures needed for the associated horse paddock on the property. The property is level and therefore the physical characteristics are suitable for construction rather than expanding or utilising agricultural activities. As mentioned above the proposed land use application is not in conflict with any relevant spatial plan applicable to the subject property and the character of the area is also in accordance with the proposal. Additional allocation of municipal services is not required due to the nature of the development and the services already accessible on the property. Finally, no neighbour will be overshadowed or overlooked. The area where Erf 21277, Mossel Bay is located (within the 55RDI noise contour) is expected to develop with similar land uses.

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.

- Guideline on Need and Desirability (2013): this guideline was consulted in completing the Need and Desirability report.
- Guideline on Public Participation (2013): this guideline informed the public participation process followed.
- Guideline on Environmental Management Plans (June 2005): this guideline informed the development of the project EMPr.

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

A Screening Tool Report was generated for the proposed development and is herewith included in the Draft BAR as Appendix I. Based on the selected classification, and the environmental sensitivities of the proposed development footprint, the following list of specialist assessments has been identified for inclusion in the assessment report by the DEFF screening tool report:

- Landscape/Visual Impact Assessment
- Archaeological and Cultural Heritage Impact Assessment;
- Palaeontology Impact Assessment
- Terrestrial Biodiversity Impact Assessment;
- Aquatic Biodiversity Impact Assessment;
- Avian Impact Assessment;
- Socio-Economic Assessment;
- Plant Species Assessment;
- Animal Species Assessment
- Aviation Theme

The list of Specialist Studies is discussed below and where Specialist Studies as identified have not been conducted the motivation and reasoning for this has been provided.

Agricultural Compliance Statement

Digital Soils Africa drafted an Agricultural Compliance Statement in February 2024 and following information was received.

The National Web-based Environmental Screening Tool classifies the agricultural sensitivity of the site as medium, while the land capability, according to DAFF (2017), also falls under a medium classification, with no cultivated crops present on the site as indicated by the screening tool.

According to the Department of Agriculture, Forestry and Fisheries (DAFF, 2017), the climate capability of the study area is rated as 5, indicating moderate climate capability. The study area falls within the Db land type, characterized by duplex soils, where sandy topsoil abruptly overlies more clayey subsoil, making up over 50% of the land type, with less than 50% of the duplex soils containing non-red B horizons. The soil capability is rated as 4, indicating low to moderate capability, while the terrain capability is rated between 6 and 7, representing moderate to high capability. Land capability values range from 7 (low to moderate) to 8 (moderate), placing the site on the boundary between arable and non-arable land. The desktop assessment aligns with the screening tool's classification of medium agricultural sensitivity. **Given the small development footprint and its minimal impact on current agricultural activities, the specialist recommends that the development proceed.**

Landscape/Visual Impact Assessment

FC Holm CC was appointed to undertake a visual impact assessment for the proposed rezoning and development of a portion of Erf 21277, Aalwyndal, Mossel Bay and conducted said assessment in October 2022.

The site is situated partially within view of the N2 when approaching Mossel Bay from the west. The N2 has been identified as an important scenic route and view corridor all along the Garden Route, but visibility towards the site from the N2 is limited. The site lies at an elevated position on a small plateau surrounded by undulating coastal plains. A series of rivers and drainage lines bisect the coastal plains at various points, flowing towards the ocean. Mossel Bay is situated on a rocky outcrop that terminates at the Point and the area known as Kwanoqaba borders Aalwyndal to the south. There is a sharp drop in elevation to the south of the site at the edge of the plateau, through which the N2 descends towards Diaz beach and Voorbaai to the north. This results in limited visibility towards the site from the N2 as it descends towards Voorbaai and the town centre of Mossel Bay.

To the east of Aalwyndal and the site lies the Voorbaai precinct which is marked by light industrial development interspersed with residential areas. Elevation across the site varies from approximately 165 m at the south-eastern corner to approximately 170 m above M.S.L. at the north-western corner. Slopes are moderate across the site not exceeding 1:4 (<25%). Slopes >1:4 increase visual sensitivity due to the need for cut and fill areas needed to accommodate building platforms and roadways.

The site has previously been farmed and is currently used as a horse paddock and for subsequent grazing, therefore areas of pristine, undisturbed vegetation remain. Portion A of Erf 21277 that has been earmarked for development has been cleared in the past and put to pasture for farm animals. In light of the above, the type of environment can be described as "Areas or routes of low scenic, cultural, historical significance/disturbed".

The type of development falls within Category 4 development: e.g. medium density residential development, sports facilities, small-scale commercial facilities/office parks, one-stop petrol stations, light industry, medium scale infrastructure. When the type of environment is correlated with the development Category 4, an indication is that moderate visual impact can be expected.

The category of issues when moderate visual impact is expected includes:

- Potentially some effect on protected landscapes or scenic resources.
- Some change in visual character of the area.
- Introduces new development or adds to existing development in the area.

Numerous visual assessment criteria were used and triggered for this development of which briefly, landform and topography, visibility of the proposed development, view catchment area, zone of visual influence, visual sensitivity of the area and of receptors, the visual absorption capacity of the landscape, visual intrusion and finally, visual exposure.

Although Aalwyndal has a sense of rural charm it does not present a distinctive scenic or cultural sense of place that must be protected and scenic, cultural and historical significance of the area is rated as low. The topography of the area furthermore serves to visually isolate Aalwyndal and partially screen views towards the proposed new developments planned for Erf 21277, Mossel Bay, from surrounding developments and scenic routes.

Residents and receptors related to the holiday and tourist industry are rated as highly sensitive and tourism is one of the major economic drivers of the Southern Cape. Although there is some tourist activity in Aalwyndal associated with the Mossel Bay Airfield and Guest Houses and farm accommodation offered, this is not one of the major areas of Mossel Bay associated with the tourist trade. New developments could be partially visible from the N2 view corridor, which has been identified as an important scenic tourist route, but this is at a distance of more than 2 km from the proposed development site at which new developments would not be clearly noticeable to receptors and potential visual impact would be low provided appropriate mitigation measures are put in place.

Although the visual absorption of the development site itself is low due to a lack of screening vegetation and relatively flat topography, the visual absorption capacity of the area is moderate to high due to the screening effect of existing structures and taller vegetation in the areas surrounding the development site.

Numerous visual impact mitigation measures have been suggested and should be implemented during both the construction and operational phases to ensure a low visual impact of the development.

Archaeological and Cultural Heritage Impact Assessment

The applicant has readily obtained a Positive Record of Decision from Heritage Western Cape stating that the site visit revealed no archaeological materials of any sort. The study area was quite small and fairly well-vegetated, but if artefacts were present in any significant quantity, it is almost certain that some would have been visible in the sandy and/or gravelly patches.

Palaeontology Impact Assessment

According to the SAHRIS PaleoSensitivity Map Viewer (<https://sahris.sahra.org.za/map/palaeo>), the palaeontology sensitivity is High (orange colour), meaning a desktop study is required and based on the outcomes of a desktop study, an impact assessment might be needed. A palaeontological impact assessment was conducted and the following results were obtained.

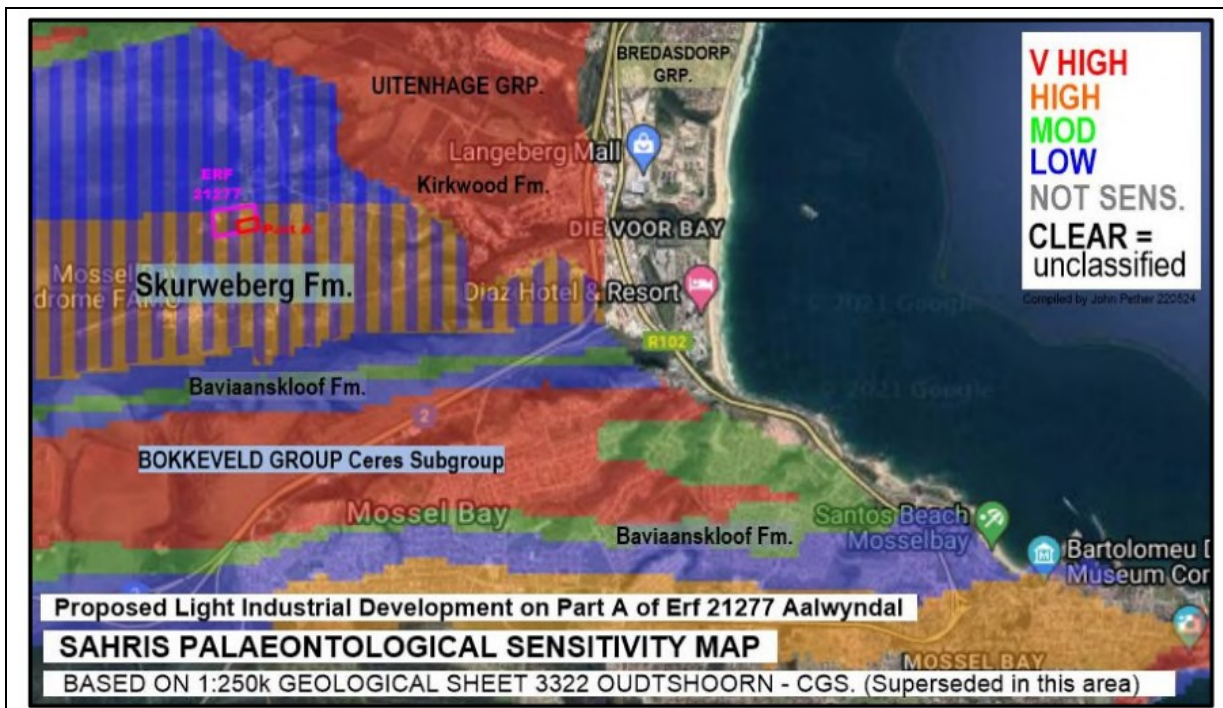


Figure 6: The site as overlaid on SAHRIS PaleoSensitivity Map Viewer, annotated to show revised extent of the Skurweberg Formation as vertical blue bars.

The subsurface impact of the construction of the proposed storage facilities, workshops and offices will be limited to the Skurweberg Formation bedrock, its weathered zone and soil, and possibly grey windblown coversands in places. The Skurweberg Formation (Nardouw Subgroup, Table Mountain Group) is of early Silurian age (~430 million years ago) and is mainly comprised of fluvial (riverine) braid-plain sandstones, with lesser muddier beds attributed to shallow marine or estuarine settings. The fossil content is sparse and only trace fossils have been recorded, mainly from the muddier interbeds (e.g. trilobite tracks, worm burrows). After the revision of said palaeontological sensitivity of the Skurweberg Formation, it can be said with confidence that the actual sensitivity rating is low, mainly due to the additional Cape Fold Belt that is exacerbated by folding and deformation where the fossil potential is further reduced, and by the development of the weathering soil profile.

As a result, impacts on fossil heritage resources due to disturbance of the soil profile formed on the weathered Skurweberg Formation underlying the Erf 21277 Portion A are not anticipated.

Terrestrial Biodiversity Impact Assessment

A Botanical Impact Assessment was conducted, and the following information was obtained; Erf 21277 Portion A is located on the Southern Cape coastal plain. The site occurs in a typical coastal fynbos environment. This is confirmed by the presence of fynbos species, such as *Aspalathus opaca*, *Metasias acuta* and several *Helichrysum* species. Typical fynbos species, such as ericas and proteas, are however absent, probably due to the disturbed state of the site. These species were noted on nearby sites where relatively undisturbed fynbos were encountered. According to the South African Vegetation Map, the vegetation occurring on site and the surrounding area has been mapped as North Langeberg Sandstone Fynbos. Mossel Bay Shale Renosterveld and Hartenbos Dune Thicket (along the coast) occur further away to the northeast and south.

While the vegetation found on site can be described as fynbos, it also shows an affinity with Mossel Bay Shale Renosterveld with the presence of renosterveld species such as *Elytropappus rhinocerotis*, *Oedera genistifolia* and *Barleria pungens*. Structurally, it can be described as a dwarf (<0.25 m) closed shrubland following Campbell's (1981) classification. The vegetation is a bit higher in certain areas where the shrub component is less disturbed. *Cynodon dactylon* (kweek) and *Helichrysum niveum* are dominant ground covers. The fynbos

shows heavy disturbance by grazing and some alien infestation, notably *Acacia cyclops* (rooikrans) and *Cynodon dactylon*.

Other Natural Areas have the greatest flexibility in terms of permissible land uses. ONA are defined as: "Areas not currently identified as a priority but retain most of their natural character and perform a range of biodiversity and ecological infrastructure functions. Although not prioritised, they are still an important part of the natural ecosystem."

Although ONAs are not prioritised, they are still an important part of the natural ecosystem. Thus, the objectives of ONA are to : "Minimize habitat and species loss and ensure ecosystem functionality through strategic landscape planning. Offers flexibility in permissible land-uses, but some authorisation may still be required for high-impact land-uses."

Many Indigenous shrub species were found during the site visit, three Species of Conservation Concern were recorded on site, namely *Hermannia lavandulifolia* (Vul), *Polygala pubiflora* (Vul) and *Ruellia pilosa* (Vul). According to the online Red List 2 of South African Plants, they are all under threat from crop cultivation, coastal developments and alien infestation. *Polygala pubiflora* is a regional endemic, mostly found in renosterveld remnants. It is still frequently encountered (by the author and others) in the Mossel Bay area, but never in large numbers. It is difficult to spot when not in flower. *Hermannia lavandulifolia* is still well represented in the Mossel Bay area and is frequently encountered. A large number (50-100 plants) of *Euphorbia procumbens* were also recorded, mainly along the southern boundary of the site. Despite being widespread between Riversdale and the Eastern Cape and not listed as threatened, its numbers are very low, with only a few records along the Garden Route.

It is recommended that should development proceed these plants be searched and rescued and replanted in a suitable area nearby where it can be protected into perpetuity.

Mark Berry has subsequently compiled a detailed Search and Rescue Plan, dated February 2024, outlining the following requirements;

- Plant species considered suitable for search and rescue include certain succulents and geophytes. *Carpobrotus cf. deliciosus*, *Acrodon bellidiflorus*, *Adromischus caryophyllaceus*, *Crassula cultrate*, *Euphorbia procumbens*, *Hypoxis villosa*, *Ledebouria revoluta*, *Ornithogalum dubium*, *Ornithogalum juncifolium*, and *Satyrium membranaceum*.
- A large number (50-100 plants) of *Euphorbia procumbens* were recorded, mainly along the southern boundary of the site. An effort should be made to salvage as many as possible of these. *Carpobrotus cf. deliciosus* can be partly or wholly removed for replanting purposes.
- With regards to the S&R of bulb species, the best time for removal is during leaf fall ('blaarval'). In other words, toward the end of the growth period, but before or after the flowering.
- For most flowering bulb species in the Western Cape, this will be towards the end of the winter season (maybe early spring for the Southern Cape).
- The bulbs should then be removed along with some soil, placed in gel, bagged and then taken to a nursery for temporary storage or transplanted directly in the receiving area.
- The best time for planting is during the rainy seasons (March & October). A development area 3.2 km northeast of the site has been identified as a suitable planting (receiving) area for the S&R material.



Figure 7: Proposed planting area for Search and Rescued material.

Aquatic Biodiversity Impact Assessment

An Aquatic Biodiversity Compliance Statement was conducted, and the following statement is of consideration.

The Site Investigation confirmed the presence of a natural Channelled Valley-Bottom (CVB) Wetland Area associated with a Non-Perennial Drainage Line situated approximately 420 metres northeast of the proposed development footprint and a Depression Wetland associated with the Mossel Bay Aerodrome situated approximately 800 metres southwest of the concerned development footprint. No aquatic resources were discovered on the concerned portion of Erf 21277 directly.

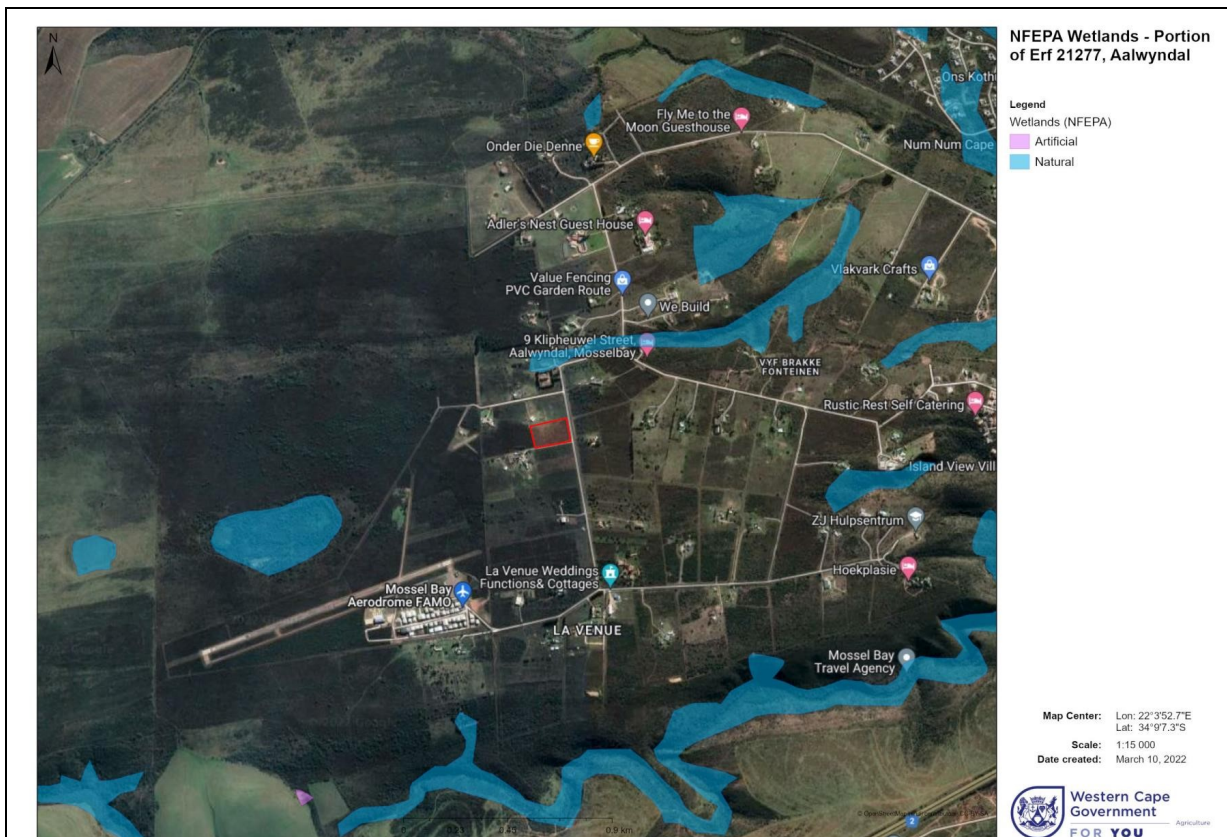


Figure 8: Depicts the concerned development footprint in relation to the National Freshwater Ecological Priority Areas (NFEPA) Database for Wetlands.

A Section 21(c) & (i) Risk Assessment Matrix as it pertains to the National Water Act, 1998 (Act No. 36 of 1998) was compiled related to the potential impacts of the development proposal on this Channelled Valley-Bottom (CVB) Wetland System. The proposed development will be located within 500 metres of this wetland system (within the regulated area) in accordance with General Notice 509 of 2016 for Section 21(c) and 21(i) Water Uses of the National Water Act, 1998 (Act 36 of 1998). Based on the outcome of the Section 21(c) & (i) Risk Assessment, the proposed activities associated with the construction and establishment of the proposed Mossel Bay Storage facility has been assessed to have a Low-Risk Significance (with mitigation) on the water source identified.

The author is also of the opinion that the legislative requirement for the proposed storage and solar development on a portion of Erf 21277 in Aalwyndal to register a GA (General Authorisation) in terms of the National Water Act, 1996 (Act No. 36 of 1998) for Section 21 (c) & (i) water use activities, with the Breede-Olifants Catchment Management Agency (BOCMA) could potentially be waived given the associated Low Risk Significance of anticipated impacts together with the significant distance (>400m) of the concerned property to the identified water resource.

The potential waiving of the requirement to register a GA should, however, be supported and confirmed by the Breede-Olifants Catchment Management Agency.

According to Rudzani Makahane from BOCMA, sent via email in correspondence to the revised Aquatic Assessment Report, the following confirmation pertaining to the above has been obtained, "Your request has been granted and the GA is therefore not required."



Figure 9: Portion of Erf 21277 (red polygon) in relation to identified Channelled-Valley Bottom (CVB) Wetland System (blue polygon) together with the 500-metre Regulation Zone (dark red polygon) in accordance with GN.509 of 2016 for Section 21(c) & (i) water uses as it relates to the National Water Act, 1998 (Act No. 36 of 1998) for wetlands.

As a result, no aquatic features occur on the site, and therefore the EAP is disputing the Very High Aquatic Sensitivity determined by the Screening Tool. The proposed structures/infrastructure was assessed to have minimal impact on this wetland system given the location of the development proposal in relation to this aquatic system (>400 metres), the relatively small scale of the development, the fact that, although limiting, will still allow for free movement of water and sediments through this system and the Present Ecological State of this wetland system which was assessed to be Largely Modified (PES Category D) as a result of historical anthropogenic factors. Therefore, the proposed development will not have an impact on any surface or groundwater aquatic resources and mitigation measures have been suggested to limit any factors that might have an impact on the Channelled Valley-Bottom (CVB) Wetland System.

Avian Impact Assessment

The total extent of the site to be developed is 1.44ha and was previously utilized as a large residential lifestyle dwelling within the urban edge. The development footprint (1.44ha) has over the years been cleared and utilized for grazing of animals. A large portion of the remainder still contains intact natural vegetation with shrubs and tree species.

The avian species identified by the Screening tool are as follows:

- *Circus maurus* – Black Harrier
- *Neotis denhami* – Denham's bustard
- *Circus ranivorus*- African marsh harrier
- *Bradypterus sylvaticus* – Knysna warbler
- *Campethera notata* – Knysna woodpecker

The development footprint (1.44ha) has over the years been heavily impacted by the grazing of animals. The vegetation on the site only contains groundcovers and low shrubs. It is thus clear that these avian species do not utilise nor frequent the proposed site as it does not contain any habitat or prey species.

Due to the nature of the proposed development, it is highly unlikely that sensitive avian species will be impacted, as these birds are highly mobile and can move away from disturbances with large tracts of natural areas to the west and further north.

Socio-Economic Impact Assessment

The proposed storage development will have a positive socio-economic impact in providing employment opportunities during both the constructional and operational phase, both in terms of running the facility and in terms of the business that will be able to operate from the facility. The access and use of storage is also a common requirement in modern society and this has been identified by the proponent as a need in the area. These are clear economic and social benefits which fall within the National Development plan to achieve economic growth and increase public and private investments for job creation in the area.

Plant Species Assessment

A Botanical Impact Assessment was conducted and the following information was obtained; Erf 21277 Portion A is located on the Southern Cape coastal plain. The site occurs in a typical coastal fynbos environment. This is confirmed by the presence of fynbos species, such as *Aspalathus opaca*, *Metalasia acuta* and several *Herichrysum* species. Typical fynbos species, such as ericas and proteas, are however absent, probably due to the disturbed state of the site. These species were noted on nearby sites where relatively undisturbed fynbos were encountered. According to the South African Vegetation Map, the vegetation occurring on site and the surrounding area has been mapped as North Langeberg Sandstone Fynbos. Mossel Bay Shale Renosterveld and Hartenbos Dune Thicket (along the coast) occur further away to the northeast and south.

While the vegetation found on site can be described as fynbos, it also shows an affinity with Mossel Bay Shale Renosterveld with the presence of renosterveld species such as *Elytropappus rhinocerotis*, *Oedera genistifolia* and *Barleria pungens*. Structurally, it can be described as a dwarf (<0.25 m) closed shrubland following Campbell's (1981) classification. The vegetation is a bit higher in certain areas where the shrub component is less disturbed. *Cynodon dactylon* (kweek) and *Helichrysum niveum* are dominant ground covers. The fynbos shows heavy disturbance by grazing and some alien infestation, notably *Acacia cyclops* (rooikrans) and *Cynodon dactylon*. However, due to a fairly high diversity of indigenous species encountered it should revert back to the original vegetation if further farming (grazing) activities are ceased (Appendix C).

Many Indigenous shrub species were found during the site visit, three species of Conservation Concern¹ were recorded on site, namely *Hermannia lavandulifolia* (Vul), *Polygala pubiflora* (Vul) and *Ruellia pilosa* (Vul). According to the online Red List 2 of South African Plants, they are all under threat from crop cultivation, coastal developments and alien infestation. *Polygala pubiflora* is a regional endemic, mostly found in renosterveld remnants. It is still frequently encountered (by the author and others) in the Mossel Bay area, but never in large numbers. It is difficult to spot when not in flower. *Hermannia lavandulifolia* is still well represented in the Mossel Bay area and is frequently encountered. A large number (50-100 plants) of *Euphorbia procumbens* were also recorded, mainly along the southern boundary of the site. Despite being widespread between Riversdale and the Eastern Cape and not listed as threatened, its numbers are very low, with only a few records along the Garden Route.

It is recommended that should the development proceed these plants be searched and rescued and replanted in a suitable area nearby where it can be protected into perpetuity.

Animal Species Assessment

The animal species identified by the Screening tool are as follows:

- *Circus maurus* – Black Harrier
- *Neotis denhami* – Denham's bustard
- *Circus ranivorus*- African marsh harrier
- *Aneuryphymus montanus* -Yellow-winged Agile Grasshopper
- *Lepidochrysops littoralis*- Coastal Blue Butterfly
- *Bradypterus sylvaticus* – Knysna warbler
- *Camphetera notata* – Knysna woodpecker

Neotis denhami generally occupies cultivated pastures, agricultural croplands and natural vegetation, but has a wide fragmented Afrotropical range, which does not place a limitation on the specific location of their habitat. *Circus ranivorus* occupy marsh and wetland habitats. *Aneuryphymus montanus* is a vulnerable species on SANBI's list and the main threats to this species are conversion of its habitat into farmland and invasions of non-native plant species. *Lepidochrysops littoralis* generally occurs in rocky limestone ridges or sand dunes in coastal fynbos and has a limited distribution, as a result *L. littoralis* is qualified globally under the IUCN criteria as Endangered under criterion B. Even though *Bradypterus sylvaticus* is classified as a vulnerable species, they have a rather spare distribution and since the site of proposed development is rather disturbed, such population patterns will not be severely impacted.

Based on the species descriptions on SANBI's website, the majority of these animal species are mobile, and make use of march, coastal and wetland area, which habitat is not immediate on the proposed development site, and thus they are unlikely to be disturbed by the proposed development as they can move away from the disturbance into the surrounding agricultural and natural areas.

A Terrestrial Animal Species Impact Assessment has been commissioned to ensure the protection of the identified animal species as contained in the Screening Tool. The following finding were made;

During the site visit, it was observed that none of the eight Species of Conservation Concern (SCC) identified in the screening tool report were present. The vegetation around the site is too disturbed and close to human habitation for more sensitive species like *C. maurus*, *C. ranivorus*, and *N. denhami* to be found there. *C. maurus* and *N. denhami* might exist in similar but less disturbed areas further west of the site, whereas *C. ranivorus* would require a nearby wetland, which is absent.

A. montanus is highly unlikely to be present at the site due to its preference for arid fynbos vegetation on rocky substrates, which contrasts with the vegetation structure at the site. Furthermore, the nearest sighting of this species is over 90 km away. *L. littoralis*, another insect SCC, is also improbable to be found at the site because its typical habitats are limestone outcrops or coastal fynbos, neither of which are present at this location.

Sensitive Species 5 is not expected to be at the site, as it is restricted to specific reserves in the Western Cape where it has been reintroduced, and the study site does not offer enough prey to sustain this species.

Similarly, *B. sylvaticus* and *C. notata*, both bird species, are unlikely to be found at the study site due to the sparse vegetation cover, especially of large shrubs and trees, which these species require.

The site visit recorded a total of 25 animal species, including seven birds, 15 insects, two mammals, and one reptile species. None of these species are of conservation concern, but noteworthy sightings included the Spotted veld antlion, Amethyst small fruit chafer, and a Parrot-beaked tortoise.

Aviation Theme

The DEFF Screening Tool Report notes that the site is located within 8 km of other civil aviation aerodrome (approximately 1km), between 15 and 35 km from a civil aviation radar and between 15 and 35 km from a

major civil aviation aerodrome. These features have been considered as high aviation sensitivities. The proposed site is located within 1-kilometre from the Mossel Bay Aerodrome.

This area has been earmarked for intensified urban development that will include plans to enlarge the present Mossel Bay Airfield. Erf 21277, Mossel Bay, is situated within the area where noise levels are considered unsuitable for residential purposes and has been identified as suitable for commercial development (light industry), including services related to the Airfield such as storage.

However, the EAP disputes this finding and recommends a Medium sensitivity without substantiating with relevant evidence, apart from indicating that comment will be obtained from the South African Civil Aviation Authority ("CAA"). Notwithstanding the above, both the Medium and High sensitivity ratings require the compilation of a compliance statement.

An Aviation Impact Assessment has been conducted by Tappas Aviation Consultant in January 2024, discussing the potential of the proposed development to interfere with the Obstacle Limited Surfaces of airports in the vicinity of the project area or to interfere with any other aviation promulgated areas surrounding the development footprint.

The following findings were generated;

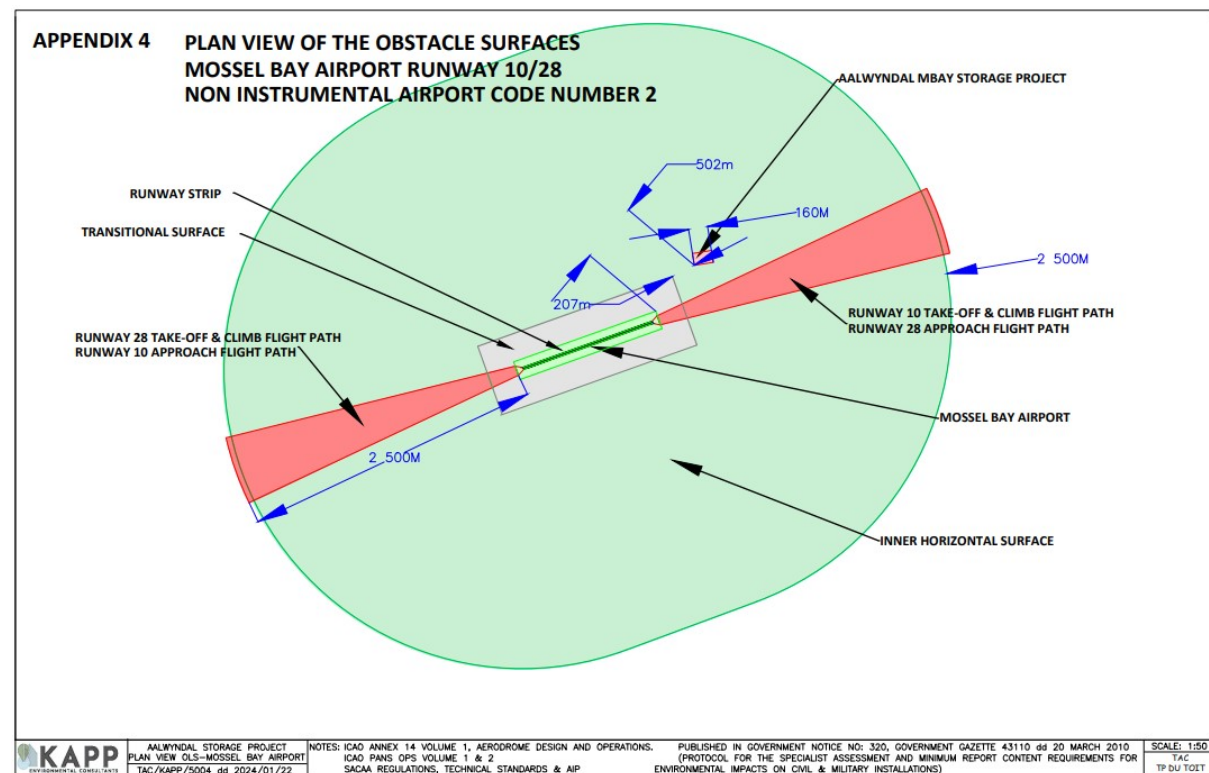
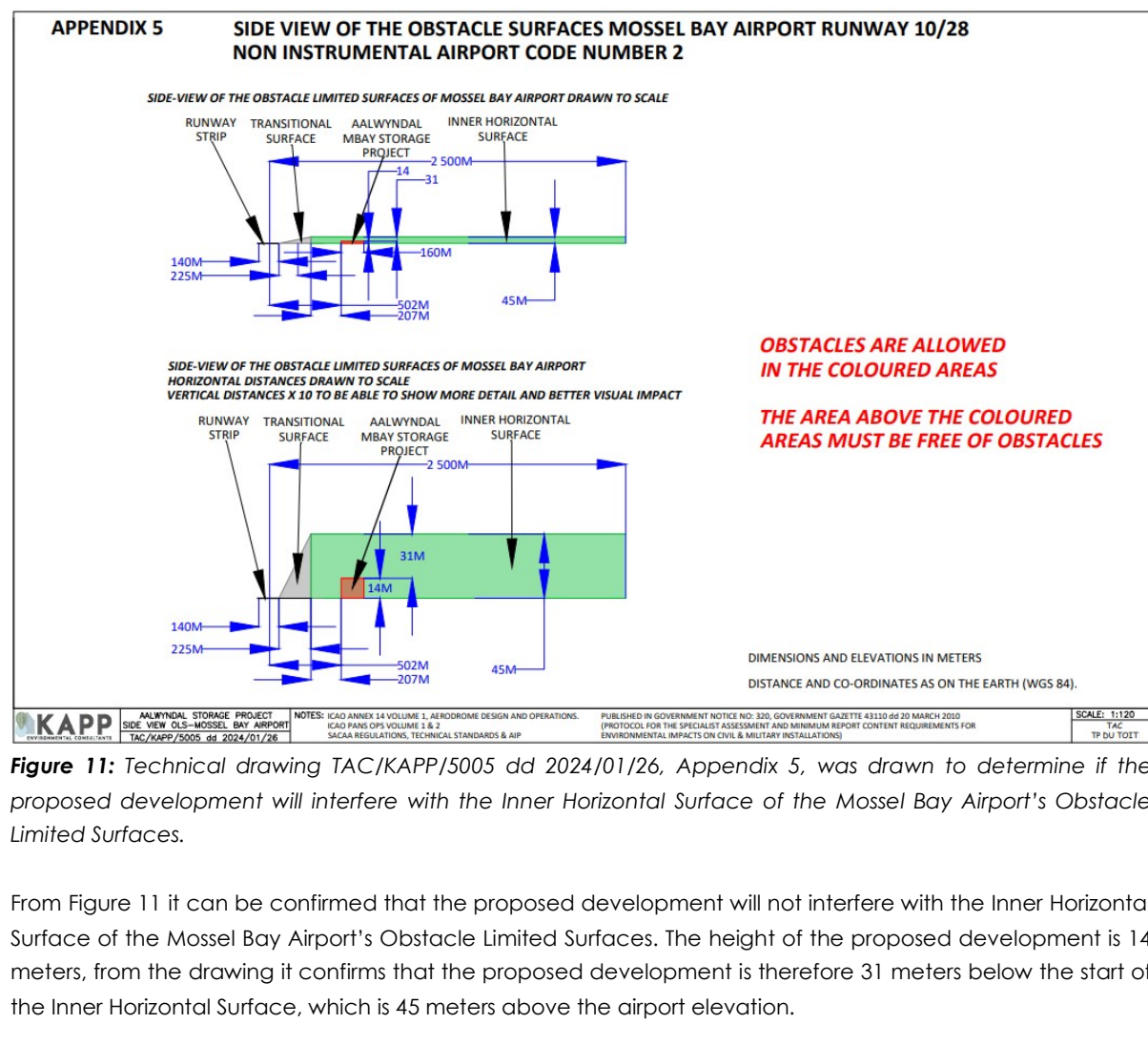


Figure 10: Technical drawing TAC/KAPP/5004 dd 2024/01/22 was drawn to determine if the Mbay Storage Project interferes with the Non-Instrumental Approach Obstacle Limited Surfaces and Approach and Take-Off Flight Paths Surfaces of the runway of Mossel Bay Airport. Data from ICAO Annex 14 and SACAA Regulations Part 139 were used to draw technical drawing, TAC/KAPP/5004 dd 2024/01/22 (Appendix 4).

The proposed development location is located inside the Mossel Bay Airport's Obstacle Limited Surfaces but outside the Runway Strip and Take-Off & Climb and Approach Flight Paths. It is thus not necessary do any assessments regarding the Take-Off & Climb and Approach Flight Paths, but it is necessary initiate an assessment for Mossel Bay Airport's Obstacle Limited Surfaces.

From Figure 10, it can be confirmed that the proposed development Powerline is located 502 metres from the start of the Runway Strip and 207 metres from the Outer Horizontal Surface. The total length of the proposed development is 160 metres.



SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 1	Describe the portion of the proposed development to which the applicable listed activity relates.
Activity 27	The clearance of an area of one hectares or more, but less than 20 hectares of indigenous vegetation except where such clearance of indigenous vegetation is required for- (i) undertaking of a linear activity; or (ii) maintenance purposes in accordance with a maintenance management plan.	The proposed development entails the clearance of more than 1ha (1.44ha) of indigenous vegetation as confirmed by the Botanical Screening Report.

Activity 28	Residential, mixed, retail, commercial, industrial or institutional developments where much land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; Excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.	The site has previously been farmed and is currently used as a horse paddock and for subsequent grazing, therefore areas of pristine, undisturbed vegetation remain. Erf 21277, Aalwyndal, Mossel Bay, is approximately 7.7 hectares in extent and is situated on Nagtegaal Street. The proposed development involves the subdivision of Erf 21277 (7.775 ha), as well as the rezoning of an approximately 1.44 ha portion of the subdivided property from Single Residential Zone 1 to Industrial Zone 1 (light industry) as a proposed self-storage facility.
Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 3	Describe the portion of the proposed development to which the applicable listed activity relates.
Note: - The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted. - Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.		

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

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

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

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

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.
An application has been filed for the establishment of a storage facility on Portion A of Erf 21277 in Aalwyndal, Mossel Bay. The proposed development site is situated in the Aalwyndal area, west of Voorbaai. Aalwyndal is recognized for its smallholdings, each approximately 7.7 hectares in size, and is presently zoned as Single Residential Zone I (Figure 1). The total extent of Erf 21277, Aalwyndal, Mossel Bay, is approximately 7.7 hectares in extent and is situated along Nagtegaal Street. The property is currently zoned Single Residential Zone 1 and will be subdivided as part of the application. The development is proposed on Portion A which comprises 1.44ha along Nagtegaal Street and will be rezoned from Single Residential Zone 1 to Industrial Zone 1 (light industry) in line with the Spatial Development Framework for the Aalwyndal precinct to accommodate the proposed self-storage facility. The	

development herewith applied for on Portion A includes the following components and has been proposed to be developed in two phases:

Phase 1 of the development will entail the development of 228 small self-storage units allocated in four separate blocks with varying building dimensions and unit sizes.

Block 1: Comprising of 42 storage units (3m x 6m).

Block 2: Comprising of 12 storage units (3m x 9m) as well as 1 storage units (5.6m x 9m).

Block 3: Comprising of 35 storage units (3m x 4m) as well as 35 storage units (3m x 7m), thus 70 units in total.

Block 4: Comprising of 33 storage units of (3m x 7.8m); 35 storage units of (3m x 3m); as well as 35 storage units of (3m x 4m).

The total development footprint of phase 1 is proposed to be approximately 4281m². Additionally, an office/toilet structure will be developed comprising of a 38m² footprint.

Phase 2 of the development will entail the development of another 228 small self-storage units allocated in four separate blocks with building dimensions and unit sizes.

Block 5: Comprising of 42 storage units (3m x 6m).

Block 6: Comprising of 12 storage units (3m x 9m) as well as 1 storage units (5.6m x 9m).

Block 7: Comprising of 35 storage units (3m x 4m) as well as 35 storage units (3m x 7m), thus 70 units in total.

Block 8: Comprising of 33 storage units of (3m x 7.8m); 35 storage units of (3m x 3m); as well as 35 storage units of (3m x 4m).

The total development footprint of phase 2 is proposed to be approximately 4281m². Additionally, an office/toilet structure will be developed comprising of a 38m² footprint.

In total, the proposed development will consist of 456 small self-storage units and a development area of 8562 m².

It is proposed that the administration office and toilet facility will be connected to a conservancy tank and the existing water line along Nagtegaal Street will supply the required potable water.

Furthermore, as per the Preferred Site Development Plan (AD21277/2023 dated 21 January 2024) 75 parking bays are required and 76 shaded parking bays have been provided for. One parking bay will be distributed and constructed per 100 m² of self-storage units (Figure 3).

The development will also include access roadways, stormwater run-off drainage and perimeter security fencing, lighting, and access control. Additionally, the proposed development will also consist of private internal access roads and civil infrastructure utilizing a Conservancy Tank System.

The entrance and exit to the proposed development are located on Nagtegaal Street as indicated on the site plan. Parking bays have been positioned along the southeastern and northwestern boundary of the site to set the buildings back from the road interface and minimise visual intrusion.

The development will also include access roadways, stormwater run-off drainage and perimeter security fencing and lighting and access control.

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.
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The site is currently zoned Single Residential Zone 1. With the current zoning, the activity is not permitted, however, a rezoning application will be submitted to rezone the property to Industrial Zone I for light Industry.

Erf 21277, Mossel Bay is located in Aalwyndal which underwent precinct planning. This current small holding area with the abutting Mossel Bay Airfield, has been identified as the next major development area for Mossel Bay according to the MSDF. The Mossel Bay Airfield has had a significant impact on the Aalwyndal area as confirmed by the airport investigation (2016). The MSDF states that the Aalwyndal precinct plan should be used to guide development for the entire Aalwyndal area. This precinct plan shows how development should occur in Aalwyndal considering the impact of the airfield and the natural environment while preventing urban sprawl. The principles of maximizing development within the urban edge is critical for the MSDF.

Erf 21277, Mossel Bay is located in the 55rdln noise contour which represents a level where residential living is not desirable. The area of Aalwyndal within this noise contour is identified for commercial activities. Aalwyndal properties bordering onto the eastern boundary of the Mossel Bay airfield are then further qualified in the app to be suitable for single storey airport related use, storage, etc. This proposal for portion a of erf 21277, Mossel Bay is then one of the first steps to create this commercial area which aims to become a viable economic hub.

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.
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No existing approvals are linked to the property. The site is currently zoned Residential Zone 1 and is mostly undeveloped and utilized for grazing (horse paddock).

4.	Explain how the proposed development will be in line with the following?
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4.1	The Provincial Spatial Development Framework.
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The Western Cape Provincial Spatial Development Framework (2014) refers to the importance of a coherent framework for the Province's urban and rural areas that gives spatial expression to the National and Provincial development agendas, among others. It's guiding principles include the following:

- Spatial justice: Past spatial and other development imbalances should be redressed through improved access to and use of land by disadvantaged communities.
- Sustainability and resilience: Land development should be spatially compact, resource-frugal, compatible with cultural and scenic landscapes, and should not involve the conversion of high potential agricultural land or compromise ecosystems. Resilience is about the capacity to withstand shocks and disturbances such as climate change or economic crises, and to use such events to catalyse renewal, novelty and innovation. The focus should be on creating complex, diverse and resilient spatial systems that are sustainable in all contexts.
- Spatial efficiency: Efficiency relates to the form of settlements and use of resources - compaction as opposed to sprawl; mixed-use as opposed to mono-functional land uses; residential areas close to work opportunities as opposed to dormitory settlement, and prioritisation of public transport over private car use.
- Quality and liveability: The quality of an environment directly contributes to its liveability. A qualitybuilt environment is one that is legible, diverse, varied and unique. Legible built environments are characterized by the existence of landmarks such as notable buildings and landscaping, welldefined public spaces, as well as navigable street networks. Diverse built environments offer a variety of opportunities, experiences and choice. The more varied a place, the more it is distinguishable because of the individual qualities that make it distinctive from other places.

Guiding Principle: Sustainability

The PSDF takes as its starting point the goal of sustainable development. Although sustainable development is a much talked about and widely supported goal, in practice our development path, globally, nationally and in the Western Cape, is taking us in the opposite direction. The PSDFs principles and policies are challenging, precisely because they go beyond the usual lip-service paid to the goal of sustainable development. Not everyone has the same interpretation and understanding of "sustainability". This causes numerous problems between civil society, developers, conservationists and authorities. Development is only acceptable and in the public interest if it is ecologically justifiable, socially equitable and economically viable, i.e. environmentally sustainable. This means that the development needs of present generations should be met without the ability of future generations to meet their own needs, being compromised. Sustainable development encompasses the integration of social, economic, and ecological factors into planning, decision-making and implementation so as to ensure that development serves present and future generations. It is of crucial importance for the long-term survival of humankind that all development complies with this principle.

The three pillars of sustainability, referred to as the "triple bottom line", can be viewed as providers of the capital necessary for each subsequent pillar to function. Thus, economic capital is dependent on social capital, which is in turn dependent on ecological capital. It is important to note that economic and human capital cannot draw more from society and from the ecology than what the ecology and society can yield sustainably in the long term.

Spatial justice as described in Section 7(a) of SPLUMA is not relevant to this land use application – only as far as much needed employment opportunities that will be created during the construction and to some extent operational phase.

Spatial sustainability as described in Section 7(b) of SPLUMA is relevant as a property will be used in accordance with its potential considering location and the spatial planning for the area.

Currently Erf 21277 is used as a horse paddock and for grazing with surrounding even functioning in agricultural and residential purposes. The agricultural land is essentially not affected by this land use application as Portion A is already zoned Single Residential Zone I and situated well within the urban edge.

The effective and equitable functioning of land markets is not negatively affected by this land use application. It is stated that all current and future costs to all parties for the provision of infrastructure and social services in land developments must be considered. This land use application will not increase costs to the Municipality but rather increase revenue.

It is further stated in this section of SPLUMA that land development in locations that are sustainable and that limits urban sprawl, must be promoted. This development proposal for the subject property supports this principle. This development proposal is not expected to impact not negatively on the Aalwyndal community.

Efficiency as described in Section 7(c) of SPLUMA is supported. This development proposal for Erf 21277, Mossel Bay will not have a negative impact on existing resources and infrastructure available to the area.

This proposed development does not have a negative impact regarding financial, social, economic, or environmental considerations for the relevant authorities. The proposed storage units are a quiet land use with varying intensity. It responds to the spatial planning for Aalwyndal all residents have been part of.

4.2 | The Integrated Development Plan of the local municipality.

Aalwyndal Precinct Plan (APP) (2018)

The 2016 Mossel Bay Airport Investigation and Proposal for its future usage concluded that the Mossel Bay Airfield makes a significant contribution to the economy of Mossel Bay as well as employment creation. Then the Aalwyndal Precinct Plan followed to direct the spatial future considering the impact and opportunities found for this area. At the same time within the urban area of the greater Mossel Bay, Aalwyndal plays an important role to accommodate development, limit urban sprawl and therefore ensure compliance with the principles of the Spatial Planning & Land Use Management Act, 2013 (SPLUMA). Erf 21277, Mossel Bay is located in the 55RDI noise contour which represents a level where residential living is not desirable. The area of Aalwyndal within this noise contour is identified for commercial activities. Aalwyndal properties bordering onto the eastern boundary of the Mossel Bay Airfield is then further qualified in the APP to be suitable for single storey airport related use, storage, etc. This proposal for Portion A of Erf 21277, Mossel Bay is then one of the first steps to create this commercial area which aims to become a viable economic hub. Below is an extract from the APP showing the location of Erf 21277, Mossel Bay and Portion A. This land use application complies with this precinct plan.

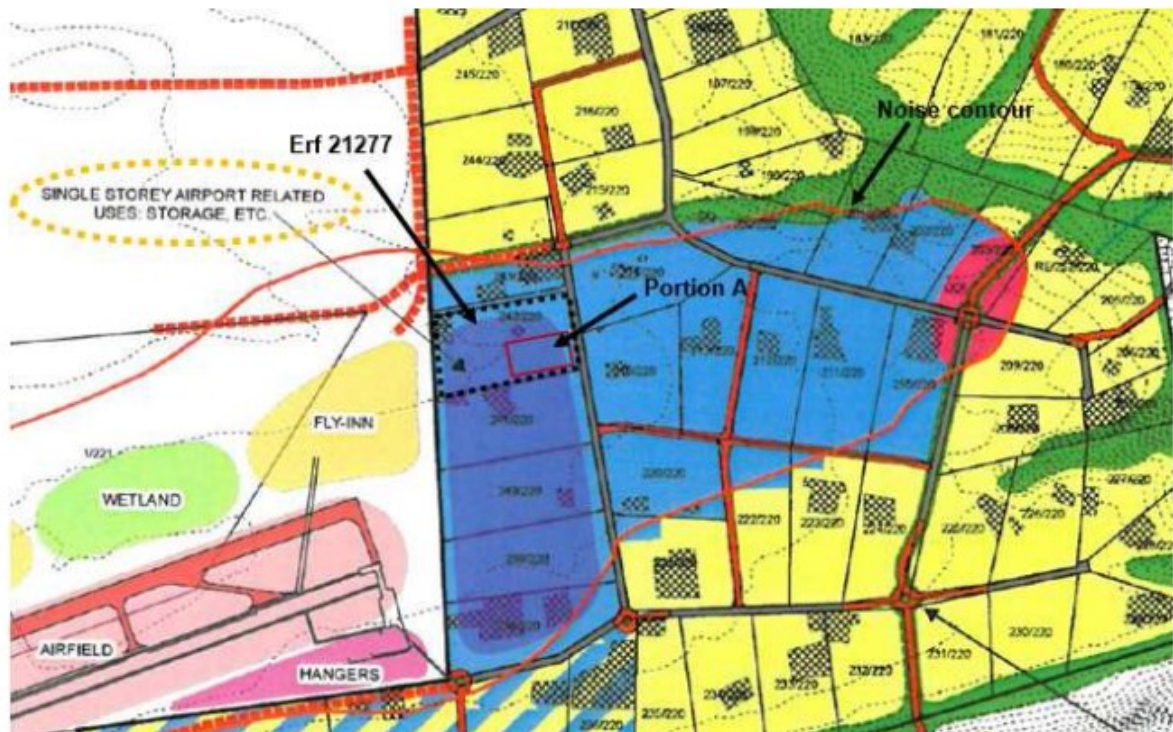


Figure 12: Extract from Aalwyndal Precinct Plan (APP) (2018), site of proposed development indicated.

In terms of the Mossel Bay Spatial Development Framework (2017) the property falls within the urban edge, within which development proposals will be considered. A further study, The Aalwyndal Precinct Plan, was completed in 2018 to guide future development in Aalwyndal. This area has been earmarked for intensified urban development that will include plans to enlarge the present Mossel Bay Airfield. Erf 21277, Mossel Bay, is situated within the area where noise levels are considered unsuitable for residential purposes and has been identified as suitable for commercial development, including services related to the Airfield such as storage.

According to the 'Evaluation of the development potential of the Aalwyndal area within the current legislative framework and applicable guide document context' which was concluded during December 2019, a biodiversity assessment was done for the subject area combining a vegetation assessment, a fresh water habitat assessment and also an ecological viability assessment. The botanical sensitivity map shows 4% very high sensitivity area, 55% high sensitivity areas and 40% medium/low sensitivity areas. Below is this sensitivity map with the proposed Portion A marked in black - it falls within the 40% medium / low sensitivity areas.



Figure 13: Botanical sensitivity map with the proposed Portion A marked in black.

Three development scenarios were evaluated with the botanical assessment as basis.

Scenario 1 will result in 66% destruction of environmentally sensitive areas which is 0.4% of natural vegetation in the entire Mossel Bay area. 80% of the area will be developed reducing the probability of urban sprawl significantly and 20% will remain open space. The NEMA principles will still in part be complied with and full compliance with the SPLUMA principles are ensured. All spatial planning for Mossel Bay will also be complied with.

Scenario 2 will create a fragmented urban structure with 60% open space (protected area) and 40% development area which. This will probably encourage future urban sprawl in Mossel Bay. Partial compliance with NEMA still applies, but the SPLUMA-principles cannot be complied with. This scenario creates conflict with the relevant spatial planning applicable to the area.

Scenario 3 finds a compromise between conservation of the environmentally sensitive areas for urban development in Aalwyndal. With this scenario 36% of the environmentally sensitive areas will be destroyed which is approximately 0.2% of the natural vegetation in the entire Mossel Bay area. It will still lead to a fragmented urban form and encourage future urban sprawl. As with the previous scenarios, the NEMA-principles will be partly complied with and compliance with the SPLUMA-principles is not possible. To compromise between conservation and development has a negative impact on yields and sustainability of the area.

To comply with the Spatial Planning and Land Use Management Act, 2013 (SPLUMA) as well as the spatial plans, Scenario 1 should be the way forward for Mossel Bay Municipality.

Mossel Bay Integrated Zoning Scheme By-law (MIZS) (2019)

Currently Erf 21277 is zoned Single Residential Zone I. The land use application implies the rezoning and subdivision of Portion A of Erf 21277 to Industrial Zone I with the development of storage facilities for public and private use. The objective of this zone is to accommodate industry uses and service trades that may be carried out without nuisance to other properties or the general public. These uses may be located next to business uses and in close proximity to residential areas, and do not present a potential negative impact on the character or amenity of such areas (Figure 2).

In terms of desirability Erf 21277, Mossel Bay is an existing urban property developed with a dwelling and structures needed for the associated horse paddock on the property. The property is level and therefore the physical characteristics is suitable for construction rather than the expansion or utilization of agricultural activities. As mentioned above the proposed land use application is not in conflict with any relevant spatial plan applicable to the subject property and the character of the area is also in accordance with the proposal. Additional allocation of municipal services is not required due to the nature of the development and the services already accessible on the property. Finally, no neighbour will be overshadowed or overlooked. The area where Erf 21277, Mossel Bay is located (within the 55RDln noise contour) is expected to develop with similar land uses.

The Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013) (SPLUMA) introduced legislative and procedural changes to the management of land use planning in South Africa. The Western Cape Province followed with the Land Use Planning Act (Act 3 of 2014) and thereafter Mossel Bay Municipality with the By-law on Municipal Land Use Planning By-law (2015). Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013) (SPLUMA) Section 7 of this Act sets out the five development principles that apply to spatial planning, land development and land use management.

Section 42 of SPLUMA then refers to the factors that must be considered by a municipal tribunal when considering a land use planning application, which includes but are not limited to: ·

- Five SPLUMA development principles; ·
- Public interest; ·
- Constitutional transformation; ·
- Respective rights and obligations of all those affected; ·
- State and impact of engineering services, social infrastructure and open space requirements; ·
- Compliance with environmental legislation.

Spatial justice as described in Section 7(a) of SPLUMA is not relevant to this land use application – only as far as much needed employment opportunities that will be created during the construction and to some extent operational phase.

Spatial sustainability as described in Section 7(b) of SPLUMA is relevant as a property will be used in accordance with its potential considering location and the spatial planning for the area.

Currently Erf 21277 is used as a horse paddock and for grazing with surrounding erven functioning in agricultural and residential purposes. The agricultural land is essentially not affected by this land use application as Portion A is already zoned Single Residential Zone I and situated well within the urban edge.

The effective and equitable functioning of land markets is not negatively affected by this land use application. It is stated that all current and future costs to all parties for the provision of infrastructure and social services in land developments must be considered. This land use application will not increase costs to the Municipality but rather increase revenue.

It is further stated in this section of SPLUMA that land development in locations that are sustainable and that limits urban sprawl, must be promoted. This development proposal for the subject property supports this principle. This development proposal is not expected to impact not negatively on the Aalwyndal community.

Efficiency as described in Section 7(c) of SPLUMA is supported. This development proposal for Erf 21277, Mossel Bay will not have a negative impact on existing resources and infrastructure available to the area.

This proposed development does not have a negative impact on financial, social, economic or environmental considerations for the relevant authorities. The proposed storage units are a quiet land use with varying intensity. It responds to the spatial planning for Aalwyndal all residents have been part of.

Land Use Planning Act (Act 3 of 2014) (LUPA)

LUPA requires that local municipalities consider the following when deciding on land use applications:

- Applicable spatial development frameworks;
- Applicable structure plans;
- Land use planning principles referred to in Chapter VI (Section 59) which is an expansion of the five development principles of SPLUMA;
- Desirability of the proposed land use; and
- Guidelines that may be issued by the Provincial Minister regarding the desirability of proposed land use.

Section 19(1) and (2) of LUPA refers to consistency and compliance of a land use proposal regarding spatial development frameworks or structure plans:

If a spatial development framework or structure plan specifically provides for the utilisation or development of land as proposed in a land use application or a land development application, the proposed utilisation or development is regarded as complying with that spatial development framework or structure plan;

(2) If a spatial development framework or structure plan does not specifically provide for the utilisation or development of land as proposed in a land use application or a land development application, but the proposed utilisation or development is not conflict with the purpose of the relevant designation in the spatial development framework or structure plan, the utilisation or development is regarded as being consistent with that spatial development framework or structure plan.

Section 19(3) of LUPA states the following:

If the proposed utilisation or development of land in a land use application or a land development application does not comply with and is not consistent with the relevant designation for the utilisation of land in an applicable spatial development framework or structure plan, the proposed utilisation or development deviates from that spatial development framework or structure plan.

Mossel Bay Municipality: By-law on Municipal Land Use Planning (2015)

The general criteria for the consideration of applications in terms of this By-law are included in Section 65 which, inter alia, includes:

- Desirability of the proposed utilisation of land;
- Impact of the proposed land development on municipal engineering services;
- Integrated development plan, including the municipal spatial development framework, the applicable local spatial development framework and/or local structure plans;
- Relevant municipal policies;

- Western Cape Provincial Spatial Development Framework;
- Section 42 of SPLUMA (public interest, constitutionality);
- Land use planning principles transposed from LUPA; and
- Provisions of the applicable zoning scheme.

Vehicular access to Portion A is proposed to be centrally along the new 90m boundary with Nagtegaal Street. The need for municipal services will be limited due to the nature of the development proposal.

4.3. The Spatial Development Framework of the local municipality.

Erf 21277, Mossel Bay is located in Aalwyndal which underwent precinct planning. This current small holding area with the abutting Mossel Bay Airfield, has been identified as the next major development area for Mossel Bay according to the MSDF. The Mossel Bay Airfield has had a significant impact on the Aalwyndal area as confirmed with the Airport Investigation (2016).

The MSDF states that the Aalwyndal Precinct Plan should be used to guide development for the entire Aalwyndal area. This precinct plan shows how development should occur in Aalwyndal considering the impact of the airfield and the natural environment while preventing urban sprawl. The principles of maximizing development within the urban edge is critical for the MSDF. Therefore, no conflict between the development proposal for Erf 21277, Mossel Bay and the MSDF was found.

4.4. The Environmental Management Framework applicable to the area.

The Environmental Management Frameworks for the area have been adopted in June 2022.

According to the 'Evaluation of the development potential of the Aalwyndal area within the current legislative framework and applicable guide document context' which was concluded during December 2019, a biodiversity assessment was done for the subject area combining a vegetation assessment, a fresh water habitat assessment and also an ecological viability assessment. The botanical sensitivity map shows 4% very high sensitivity area, 55% high sensitivity areas and 40% medium/low sensitivity areas (Figure 5). Portion A of Erf 21277 fall within the 40% medium / low sensitivity areas.

Three development scenarios were evaluated with the botanical assessment as basis.

Scenario 1 will result in 66% destruction of environmentally sensitive areas which is 0.4% of natural vegetation in the entire Mossel Bay area. 80% of the area will be developed reducing the probability of urban sprawl significantly and 20% will remain open space. The NEMA principles will still in part be complied with and full compliance with the SPLUMA principles are ensured. All spatial planning for Mossel Bay will also be complied with.

Scenario 2 will create a fragmented urban structure with 60% open space (protected area) and 40% development area which. This will probably encourage future urban sprawl in Mossel Bay. Partial compliance with NEMA still applies, but the SPLUMA-principles cannot be complied with. This scenario creates conflict with the relevant spatial planning applicable to the area.

Scenario 3 finds a compromise between conservation of the environmentally sensitive areas for urban development in Aalwyndal. With this scenario 36% of the environmentally sensitive areas will be destructed which is approximately 0.2% of the natural vegetation in the entire Mossel Bay area. It will still lead to a fragmented urban form and encourage future urban sprawl. As with the previous scenarios, the NEMA-principles will be partly complied with and compliance with the SPLUMA-principles is not possible. To

compromise between conservation and development has a negative impact on yields and sustainability of the area.

To comply with the Spatial Planning and Land Use Management Act, 2013 (SPLUMA) as well as the spatial plans, Scenario 1 should be the way forward for Mossel Bay Municipality.

According to Section B of the 2022- 2027 revised EMF of the Mossel Bay Municipality Policy 4E states that;

Areas earmarked for growth must maintain a compact settlement form to facilitate inclusion and integration and improved service delivery.

Thereby encouraging\medium and high-density development in the urban core areas and locations such as nodes, corridors and intensification areas like Louis Fourie Corridor and Aalwyndal.

However, the recent surveys of the natural plant growth in these areas indicate vast areas with critical biodiversity areas (CBA). To conserve all the areas as identified, will severely limit these spaces to accommodate the residential demand and additional areas will have to be found for residential expansion – thereby countering the objective of a compact city. Compact city objectives should not be implemented at the cost of sense of place or well planned and used open space areas.

Furthermore, the area is partially classified as Urban Core and Tourist Activity Zone. The area accommodates the bulk of the economic activity areas in the Mossel Bay Municipal Area. The Aalwyndal area has been earmarked as an intensification area to bring residential opportunities closer to the main economic activity areas. The urban edge includes the main expansion area of Aalwyndal (Area 36) and the Mossel Bay Airport (Area 48).



Figure 12: Aalwyndal indicated as Area 36 situated inside the Urban Core, earmarked for residential and mixed-use expansion (extract from Section B of the 2022-2027 revised EMF).

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| 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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Comment with respect to biodiversity was received from DEA&DP and CapeNature respectively;

CapeNature made the following comments:

According to the Western Cape Biodiversity Spatial Plan (Pool-Stanvliet et.al. 2017)¹ the erf has Other Natural Areas and is outside the extent of Critical Biodiversity Areas and Ecological Support Areas. Furthermore, the erf does not have any freshwater features / National Freshwater Ecosystem Priority Areas (NFEPA)².

The National Biodiversity Assessment (Skowno et al. 2018)³ mapped the vegetation as North Langeberg Sandstone Fynbos which is Least Concerned (SANBI 2022).

Following a review of the Pre-Application Draft Basic Assessment Report, Biodiversity Screening Report, and Aquatic Biodiversity Compliance Statement CapeNature wishes to make the following comments:

1. Other Natural Areas have the greatest flexibility in terms of permissible land uses. ONA are defined as: "Areas not currently identified as a priority but retain most of their natural character and perform a range of biodiversity and ecological infrastructure functions. Although not prioritised, they are still an important part of the natural ecosystem."

Although ONAs are not prioritised, they are still an important part of the natural ecosystem. Thus, the objectives of ONA are to:" Minimize habitat and species loss and ensure ecosystem functionality through strategic landscape planning. Offers flexibility in permissible land-uses, but some authorisation may still be required for high-impact land-uses."

2. The Freshwater Specialist could not find any aquatic features present on erf 21277 however it is still important that the proposed mitigation measures be strictly implemented to avoid negatively impacting the surrounding aquatic habitats.

3. CapeNature reminds the applicant that all endangered species or protected species listed in Schedules 3 and 4 respectively, in terms of the Western Cape Nature Conservation Laws Amendment Act, 2000 (Act No. 3 of 2000) may not be picked or removed without the relevant permit, which must be obtained from CapeNature.

4. The North Langeberg Sandstone Fynbos has experienced low rates of natural habitat loss. The threats to this ecosystem have not been compiled yet, but it is a well protected vegetation unit with 91% of the natural extent remaining (SANBI 2022).

5. The botanist observed elements from the Mossel Bay Shale Renosterveld on the erf. The threat status for this vegetation according to the revised list of ecosystems that are threatened and in need of protection (NEM:BA 2022) is **Critically Endangered**.

According to the National Biodiversity Assessment the Mossel Bay Shale Renosterveld is one of seven high risk critically endangered vegetation types in South Africa (Skowno *et al.* 2018) which is not protected and only 38% of the natural extent remains which places this vegetation unit at risk of collapsing (SANBI 2022).

6. The Species of Conservation Concern (SCC) are clustered in the southeast section of the erf (Map 4 of the botanical report) which will be rezoned to Portion A (proposed industrial zone) and the proposed mitigation measure is to translocate these species to another site.

6.1. A similar development was proposed for a property in proximity with the same vegetation unit. It was concluded that Search and Rescue of SCC would not be a viable mitigation measure as the plants will not survive the transplanting process. Thus, has a site been identified to translocate the SCC from erf 21277? The Botanist must also assess what the success rates would be for translocation SCC.

Mark Berry has subsequently compiled a detailed Search and Rescue Plan, dated February 2024, outlining the following requirements;

- Plant species considered suitable for search and rescue include certain succulents and geophytes. *Carpobrotus cf. deliciosus*, *Acrodon bellidiflorus*, *Adromischus caryophyllaceus*, *Crassula cultrate*, *Euphorbia procumbens*, *Hypoxis villosa*, *Ledebouria revoluta*, *Ornithogalum dubium*, *Ornithogalum juncifolium*, and *Satyrium membranaceum*.
- A large number (50-100 plants) of *Euphorbia procumbens* were recorded, mainly along the southern boundary of the site. An effort should be made to salvage as many as possible of these. *Carpobrotus cf. deliciosus* can be partly or wholly removed for replanting purposes.
- With regards to the S&R of bulb species, the best time for removal is during leaf fall ('blaarval'). In other words, toward the end of the growth period, but before or after the flowering.
- For most flowering bulb species in the Western Cape, this will be towards the end of the winter season (maybe early spring for the Southern Cape).
- The bulbs should then be removed along with some soil, placed in gel, bagged and then taken to a nursery for temporary storage or transplanted directly in the receiving area.
- The best time for planting is during the rainy seasons (March & October). A development area 3.2 km northeast of the site has been identified as a suitable planting (receiving) area for the S&R material.

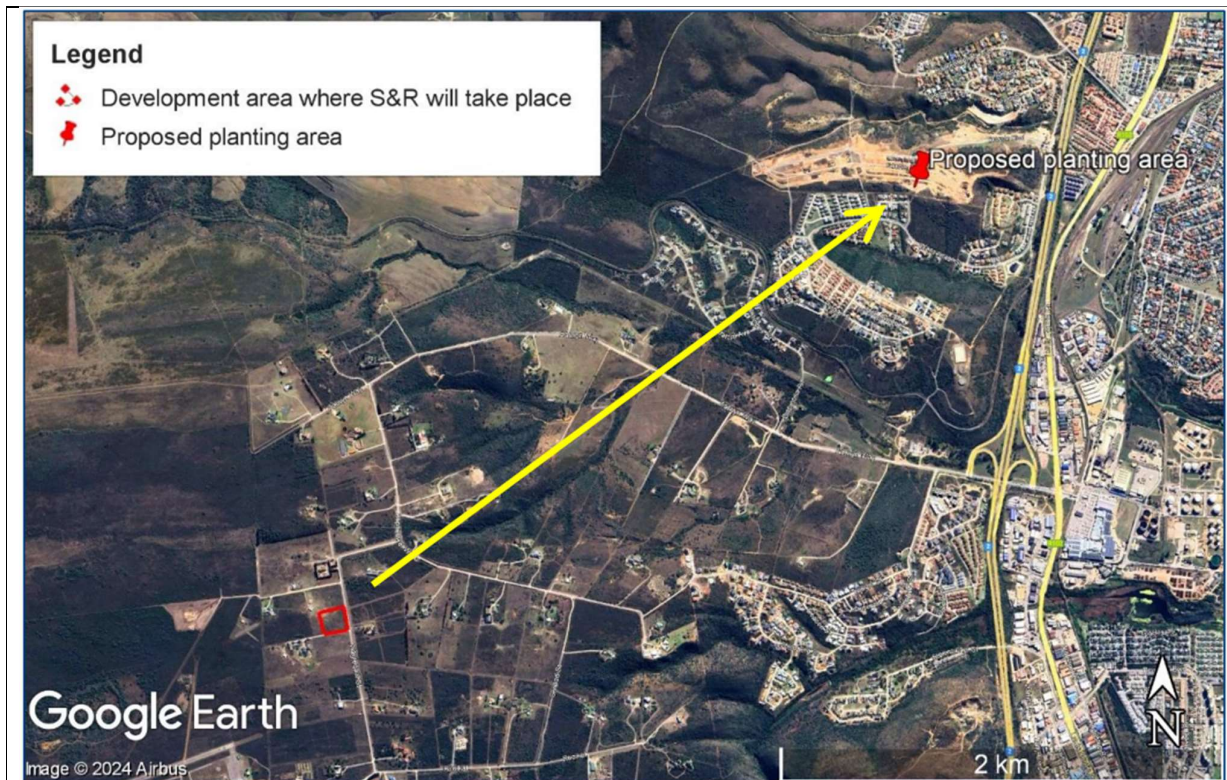


Figure 13: Proposed planting area for Search and Rescued material.

6.2. CapeNature is of the opinion that the cluster with SCC must be excluded and protected from the proposed development unless a suitable site with similar microclimate and geological conditions can be identified and when a high success rate has been confirmed. Furthermore, it will be important that an experienced Environmental Control Officer (with botanical knowledge) be appointed to oversee the removal of the plants.

Please refer to the EMP for a detailed Search and Rescue procedure compiled by Botanist Mark Berry for the translocation location and suitability of the location for the proposed bulbs and succulents. It is of the botanist's opinion that the identified SCCs cannot be searched and rescued individually. The specialist recommends that;

"Best would be to try and salvage some of the topsoil containing their seed, and distribute it where rehab is needed. The latter can be on site (if only a part of the site is developed) or a nearby disturbed area of the same veg type. I suppose u can also collect seedbearing plant material for placement on disturbed surfaces whatever makes sense."

7. The botanist does acknowledge the site is disturbed but also mentioned the degraded fynbos does have potential to fully recover. Furthermore, the botanist also observed a high diversity of indigenous species which he mentioned can revert to the original vegetation if agricultural practices are ceased. Rehabilitation success will be minimal after development, as stated in the report. Thus, the proposed development will result in the complete transformation. Considering the rapid increase in development within the Mossel Bay, specifically Aalwyndal, it remains crucial to prevent further fragmentation, habitat loss, and transformation of across the landscape.

8. Due to the presence of SCC, Presence of elements of the **Critically Endangered** Mossel Bay Shale Renosterveld, and the site having a potential to recover to its original state, the site should be viewed as sensitive. If the proposed activity will continue the loss of SCC will have a local impact, but the impact regionally should be determined.

Please refer the Section H for the proposed amendments.

In terms of biodiversity DEA&DP also provided comments:

From the information contained in the pre-app BAR it is understood that Erf 21277 is used as a horse paddock and for grazing. Historic aerial imagery suggests that this land use commenced between 13 September 2013 and 22 March 2016. Therefore, the property was used for agricultural purposes. Furthermore, it is understood that Erf 21277 (ca. 7.7ha) will be subdivided and the resultant Portion A rezoned from Single Residential Zone I to Industrial Zone I to accommodate the storage facility.

In light of the above, this Department is of the considered view that the proposed development triggers Activity 28 of Listing Notice 1 (Government Notice No. R. 983 of 4 December 2014, as amended).

In light of the above, please be advised that only those activities applied for shall be considered for authorisation. The onus is on the proponent to ensure that all the applicable listed activities are applied for and assessed as part of the Basic Assessment process.

Please refer to Section D for revised amendments.

2.3. Specialist reports:

Biodiversity Assessment by Mark Berry Environmental Consultants

The findings of the Biodiversity Assessment have been noted. According to the assessment the vegetation on the property has been disturbed as a result of the agricultural activities but that only a small portion of the site (ca. 0.4ha in the northwestern corner of the site) has completely transformed due to the agricultural activities. The assessment states that the remainder of the disturbed area has the potential to fully recover if allowed to rest.

Furthermore, the assessment identified three Species of Conservation Concern, namely *Hermannia lavandulifolia* (VU), *Polygala pubiflora* (VU) and *Ruellia pilosa* (VU). A large number of *Euphorbia procumbens* was also recorded by the specialist, along the southern boundary. According to the assessment, the numbers of this plant along the Garden Route is low. A **search and rescue procedure** is therefore recommended; but only if it can be demonstrated that a high transplant success rate can be achieved. If this cannot be achieved, the impacts on this biodiversity must be avoided, only where they cannot be avoided they must be mitigated. All biodiversity mitigation options must be reported on.

As per the above, please refer to the EMP for a detailed Search and Rescue procedure compiled by Botanist Mark Berry for the translocation location and suitability of the location for the proposed bulbs and succulents. It is of the botanist's opinion that the identified SCCs cannot be search and rescued individually. The specialist recommends that;

"Best would be to try and salvage some of the topsoil containing their seed, and distribute it where rehab is needed. The latter can be on site (if only a part of the site is developed) or a nearby disturbed area of the same veg type. I suppose u can also collect seedbearing plant material for placement on disturbed surfaces whatever makes sense."

In this regard, please be advised that all endangered species or protected species listed in Schedules 3 and 4 respectively of the Western Cape Nature Conservation Laws Amendment Act, 2000 (Act No. 3 of 2000) may not be picked or removed without the relevant permit from CapeNature.

Aquatic Biodiversity Verification Assessment by DDK Consulting

The Department notes that there are no aquatic features within the boundaries of the subject property. The nearest aquatic feature is approximately 420m northeast of the proposal and the expected impact thereon is considered low.

In light of the above, the proposal may require Water Use Authorisation in terms of Section 21(c) and (i) of the National Water Act, Act No. 36 of 1998 ("NWA") (i.e. any activity within the regulated area of a wetland or river). Therefore, you are advised to consult the Breede-Gouritz Catchment Management Agency to clarify the applicability of the NWA.

A Section 21(c) & (i) Risk Assessment Matrix as it pertains to the National Water Act, 1998 (Act No. 36 of 1998) was compiled related to the potential impacts of the development proposal on this Channelled Valley-Bottom (CVB) Wetland System. The proposed development will be located within 500 metres of this wetland system (within the regulated area) in accordance with General Notice 509 of 2016 for Section 21(c) and 21(i) Water Uses of the National Water Act, 1998 (Act 36 of 1998). Based on the outcome of the Section 21(c) & (i) Risk Assessment, the proposed activities associated with the construction and establishment of the proposed Mossel Bay Storage facility has been assessed to have a Low-Risk Significance (with mitigation) on the water source identified.

The author is also of the opinion that the legislative requirement for the proposed storage development on a portion of Erf 21277 in Aalwyndal to register a GA (General Authorisation) in terms of the National Water Act, 1996 (Act No. 36 of 1998) for Section 21 (c) & (i) water use activities, with the Breede-Olifants Catchment Management Agency (BOCMA) could potentially be waived given the associated Low Risk Significance of anticipated impacts together with the significant distance (>400m) of the concerned property to the identified water resource.

The potential waiving of the requirement to register a GA should, however, be supported and confirmed by the Breede-Olifants Catchment Management Agency.

According to Rudzani Makahane from BOCMA, sent via email in correspondence to the revised Aquatic Assessment Report, the following confirmation pertaining to the above has been obtained, "Your request has been granted and the GA is therefore not required."

Civil Aviation

With reference to this Department's letter issued on 4 June 2021, a Civil Aviation Compliance Statement must be prepared due to the close proximity of the proposed development to the Mossel Bay Aerodrome. However, such statement has not been included as part of the pre-app BAR.

In light of the above, you are hereby advised that the relevant information and comment from the Civil Aviation Authority in respect of the proposal must be included in the Draft BAR.

Please refer to Sections C and H of this BAR for the findings of the Civil Aviation specialist, CASS.

2.5. Environmental Management Programme

The contents of the Environmental Management Programme ("EMPr") must meet the requirements outlined in Section 24N (2) and (3) of the NEMA (as amended) and Appendix 4 of GN No. R. 982 of 4 December 2014. The EMP must address the potential environmental impacts of the activity throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing).

This Department has reviewed the EMPr as included and received as part of the pre-app BAR. The following aspects must be addressed:

Monitoring / Reporting

According to Section 3.1 of the EMPr an independent Environmental Control Officer (“ECO”) must be appointed which will be responsible for fortnightly audits on compliance to the conditions of an Environmental authorisation and the EMPr. A clear distinction must be made between the environmental monitoring reports and postconstruction rehabilitation reports by the ECO and the environmental audit report to be compiled by an independent person with the relevant environmental auditing expertise. In this regard, please note that the environmental auditor cannot be the EAP or the ECO.

Furthermore, take note of the auditing requirements with regard to environmental authorisations and EMPr's under Regulation 34 of the EIA Regulations, 2014 (as amended). In this regard, the EMPr must be amended to ensure compliance with the requirements. The contents of the environmental audit report must comply with Appendix 7 of the EIA Regulations.

Search and Rescue

As referenced under Point 2.3 of this letter, the botanical specialist recorded three Species of Conservation Concern as well as *Euphorbia procumbens* which as low numbers within the Garden Route District. Furthermore, the botanical specialist recorded the presence of *Homopus areolatus* (common padloper / parrot-beaked tortoise). Although, a section dealing search and rescue of fauna and flora (page 37 of the EMPr) has been included in the EMPr, the site specific information has not been described in the EMPr.

In light of the above, the search and rescue procedure described on page 37 (Fauna and Flora) is not considered adequate. As such, a more comprehensive description of the Search and Rescue procedure (what, when, where, how) must be described in the EMPr in order to increase the success of the search and rescue operation.

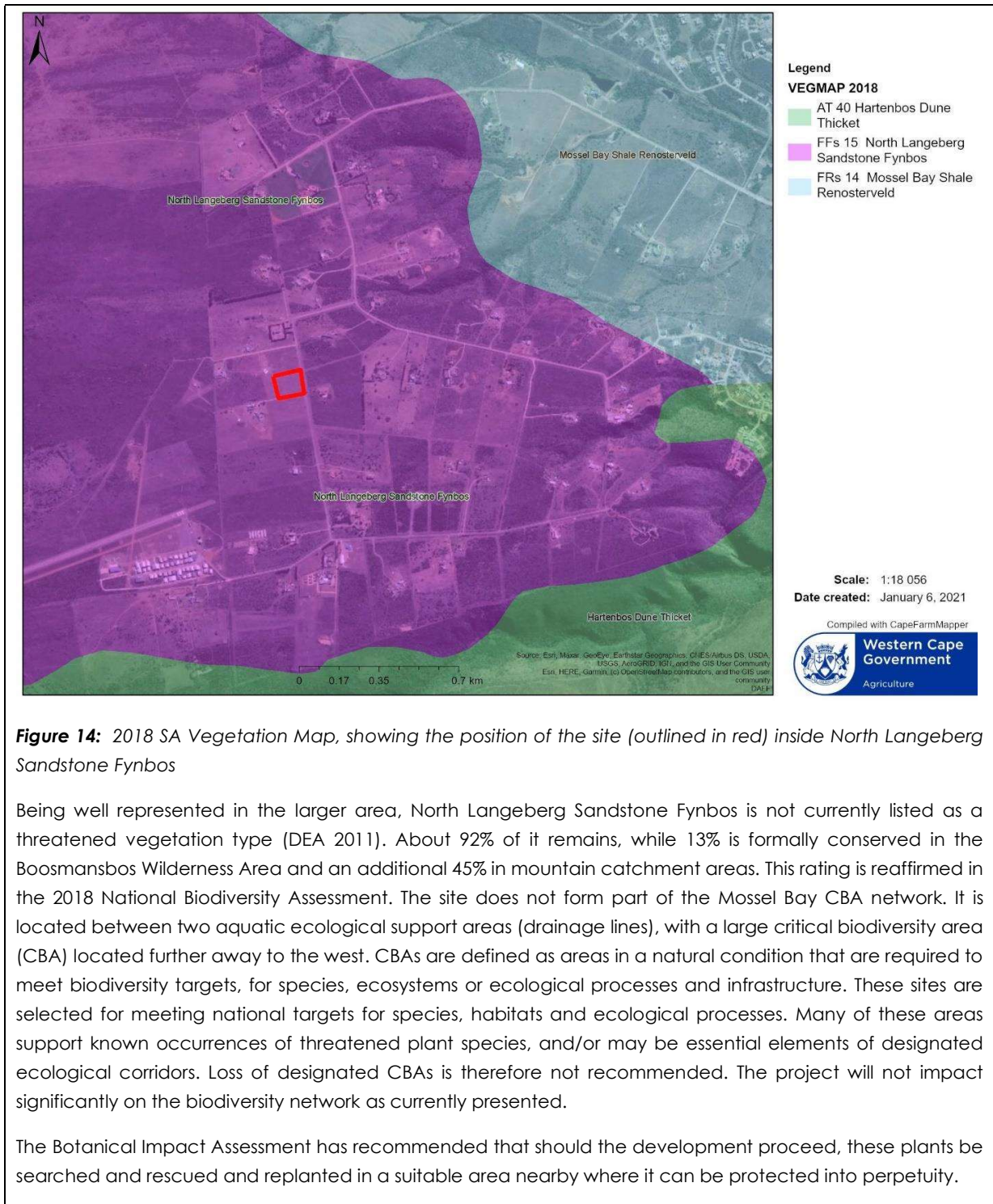
Please refer to the attached and incorporated Search and Rescue Plan drafted by Mark Berry further elaborating and providing a more comprehensive description of the Search and Rescue procedure (what, when, where, how) as briefly discussed above.

Map with environmental sensitivities.

The EMPr must include a map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers.

Botanical Screening Assessment

According to the 3422 AA Mossel Bay 1:50 000 geological map, the site is underlain by Table Mountain Group sandstone. The base rock comprises Skurweberg Formation, which is described as a light-grey quartzitic sandstone. The entire marine planed flat area of Aalwyndal is made up of this unit, which is best exposed along the coast between Cape St Blaize and Dana Bay.



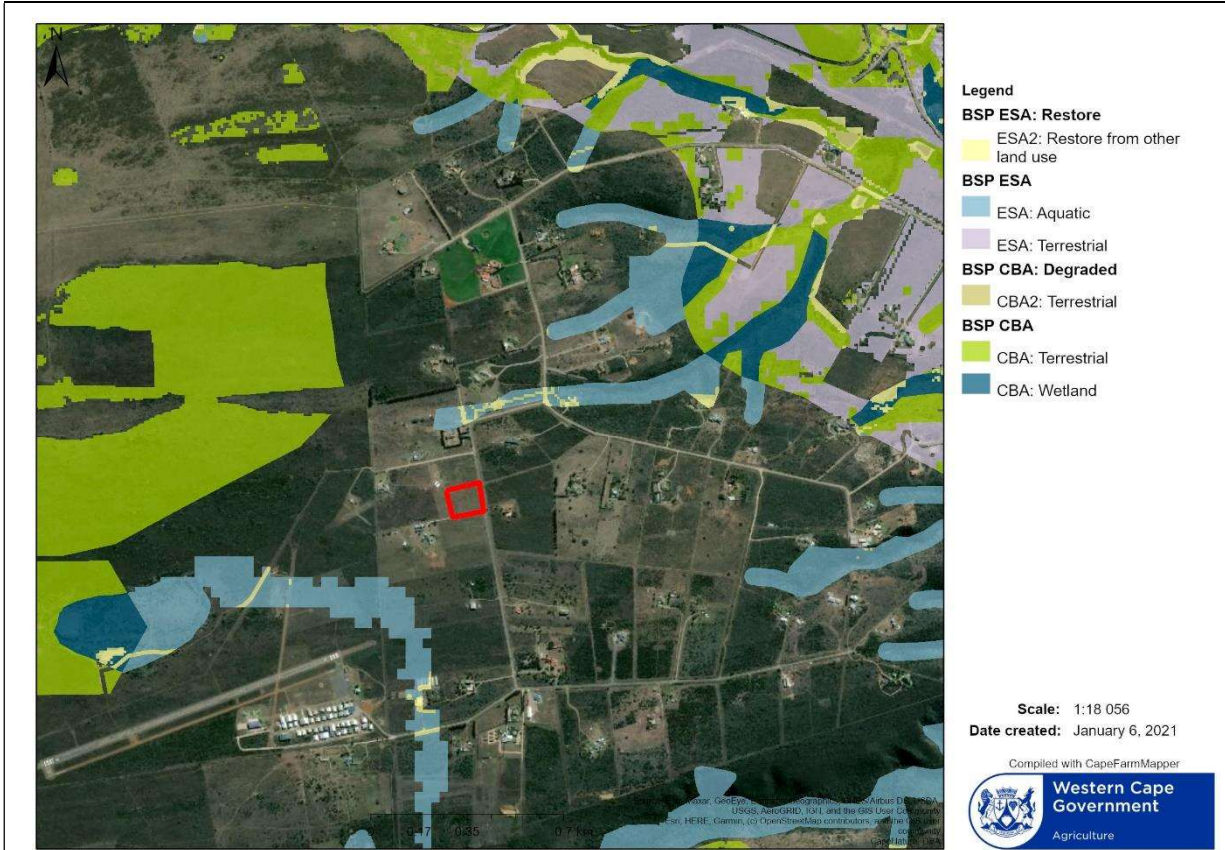


Figure 15: Biodiversity network map, with Portion A on Erf 21277 marked in red.

Aquatic Biodiversity Compliance Statement:

The Site Investigation confirmed the presence of a natural Channelled Valley-Bottom (CVB) Wetland Area associated with a Non-Perennial Drainage Line situated approximately 420 metres northeast of the proposed development footprint. No aquatic resources were discovered on the concerned portion of Erf 21277 directly. This was additionally confirmed using Section 21(c) & (i) Risk Assessment Matrix as it pertains to the National Water Act, 1998 (Act No. 36 of 1998) to assess the potential impacts of the development proposal on this Channelled Valley-Bottom (CVB) Wetland System which indicated that the proposed development will have a Low-Risk Significance (with mitigation) on the water source identified.

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| 6. | Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development. |
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The Western Cape Biodiversity Spatial Plan is informed by the Aalwyndal Precinct Plan and the Mossel Bay Municipality SDF and EMF. The development does not encroach into any sensitive areas as outlined in the Aalwyndal Precinct Plan, nor the EMF.

The Western Cape Biodiversity Spatial Plan desired management objectives are categorised whether the site falls within a Protected Area, Critical Biodiversity Area 1 or 2, Ecological Support Area 1 or 2, Natural to near-natural Area or no natural remaining area. Based on the findings the site comprises a grazing area covered by degraded fynbos which has a significant effect on the categorisation of the proposed site.

The site does not form part of the Mossel Bay CBA network. It is located between two aquatic ecological support areas (drainage lines), with a large critical biodiversity area (CBA) located further away to the west. CBA's are defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure. These sites are selected for meeting national targets for

species, habitats, and ecological processes. Many of these areas support known occurrences of threatened plant species, and/or may be essential elements of designated ecological corridors. Loss of designated CBA's is therefore not recommended. The project will not impact significantly on the biodiversity network as currently presented.

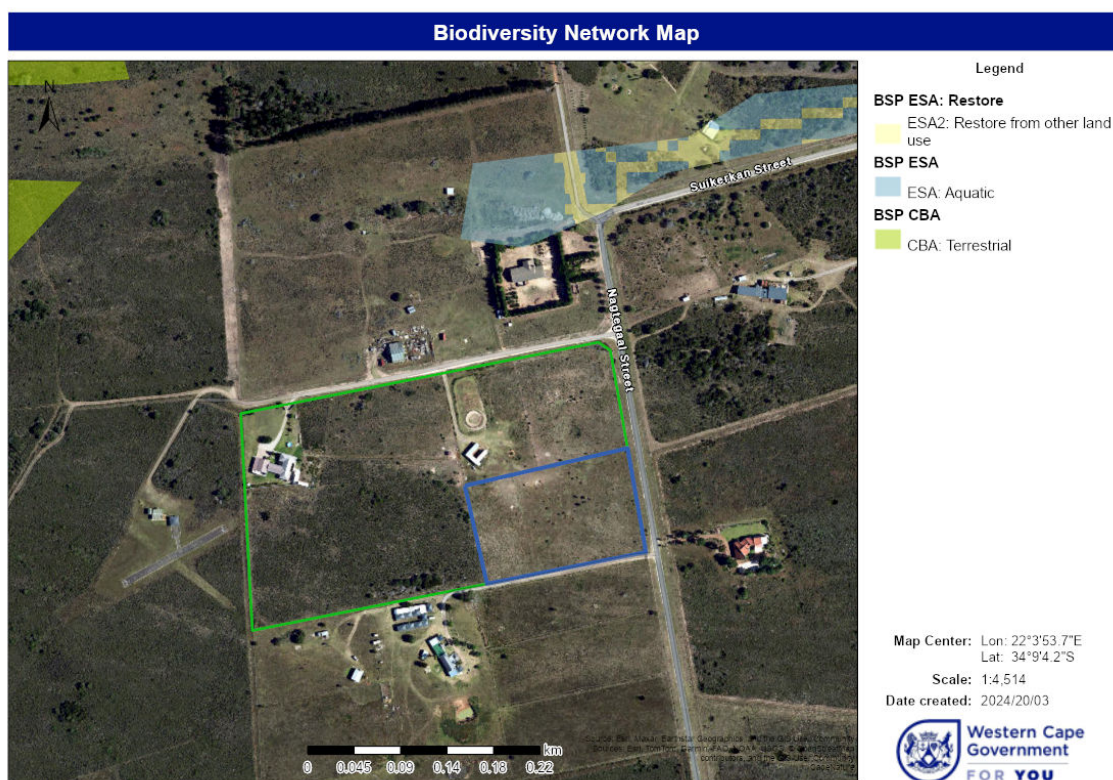


Figure 16: Biodiversity Network

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

The proposed development does not lie within the coastal public property, the coastal protection zone or coastal access land.

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.

No, the screening report has not changed.

Specialist studies that have been conducted include;

1. Agricultural Compliance Statement – Digital Soils Africa
2. Landscape/Visual Impact Assessment – FC Holm
3. Archaeological and Cultural Heritage Impact Assessment - Dr Jayson Orton ASHA Consulting (Pty) Ltd
4. Palaeontology Impact Assessment - John Pether, Geological and Palaeontological Consultant
5. Terrestrial Biodiversity Impact Assessment – Mark Berry
6. Aquatic Biodiversity Impact Assessment – Dietmar, DDK Consulting
7. Plant Species Assessment and Search and Rescue Plan – Mark Berry
8. Animal Species Assessment - Willem Matthee

9. Aviation Theme - Tobie, Tappas Aviation Consultant	
9.	Explain how the proposed development will optimise vacant land available within an urban area. The proposed storage development will have a positive socio-economic impact in providing employment opportunities during both the construction and operational phase, both in terms of running the facility and in terms of the business that will be able to operate from the facility. The access and use of storage is also a common requirement in modern society, and this has been identified by the proponent as a need in the area. These are clear economic and social benefits that will achieve economic growth and increase public and private investments for job creation in the area. The site needs to be developed in a sustainable manner producing both a financial incentive to the proponent as well as a social benefit to the local community without impact on the biophysical resources on the site. The property falls within the urban edge, within which development proposals will be considered. A further study, the Aalwyndal Precinct Plan, was completed in 2018 to guide future development in Aalwyndal. This area has been earmarked for intensified urban development, including plans to enlarge the Mossel Bay Airfield. Erf 21277, Mossel Bay, is situated within the area where noise levels are considered unsuitable for residential purposes and has been identified as suitable for commercial development, including services related to the Airfield such as storage.
10.	Explain how the proposed development will optimise the use of existing resources and infrastructure. The need for water, electricity and sewerage disposal is very limited due to the nature of the development proposal (storage facility with a single administrative building which would require water and sewage disposal). A conservancy tank is proposed for the toilet facility of the administrative office building, to be serviced by a private contractor as the need occurs. A water connection is available for the basins and the toilet. Electricity connections are also readily available. Since these facilities and services are readily available on the property, concurrent use will promote the use of the existing resources. Additionally, this land use application will not increase costs to the Municipality due to the services of a private contractor, but rather increase their revenue - Economic injection via the storage facilities.
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). The need for water, electricity and sewerage disposal is very limited due to the nature of the development proposal (storage facility with a single administrative building which would require water and sewage disposal). A conservancy tank is proposed for the toilet facility of the administrative office building, to be serviced by a private contractor as the need occurs. A water connection is available for the basins and the toilet. Electricity connections are also readily available. As a result, the construction/addition of a conservancy tank sewage system needs to be considered as well as the services of the private sewage disposal company. Confirmation letter that states Municipal capacity is herewith included in Appendix E16.
12.	In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K. Please refer to Appendix K for a detailed recall of the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013).

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.

Not applicable

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

The EAP had identified potential Interested and Affected Parties, as well as commenting authorities, to be notified as part of the Pre-Application Basic Assessment Report. The surrounding landowners consisted of smallholdings. All potential Interested and Affected Parties were notified via email, which included a detailed notification letter summarizing the proposed Pre-Application Basic Assessment Report. This email also contained a link to complete electronic copies of the Pre-Application Draft Basic Assessment Report for download, as well as access on the KAPPEC website.

A full public participation process was conducted to notify additional interested and affected parties in terms of Chapter 6 of the Environmental Impact Assessment Regulations, 2014 (published under GN R.982 in GG 38282 of 04 December 2014, as amended up to and including GN R.706 in GG 41766 of 13 July 2018).

The following process was undertaken to facilitate public participation for the proposed project, which commenced on the 25th of January and ended on the 27th of February 2023:

Proof of Newspaper Advertisement

An advertisement notifying the public of the Basic Assessment process and requesting potential Interested and Affected Parties (I&APs) to register and submit their comments to Kapp Environmental Consultants (KAPPEC) was placed in the *Mossel Bay Advertiser* on Friday, the 20th of January 2023.

Proof of Site Notice Boards

To inform surrounding communities and adjacent landowners of the proposed development, two site notices (in Afrikaans and English) were erected at visible locations near the site, specifically on the fence along Nagtegaal Street.

Proof of Direct Notification of Identified I&APs

Identified I&APs, including key stakeholders from provincial and local authorities, ward councillors, non-governmental organizations, and directly adjacent landowners, were informed of the proposed development by post on Thursday, the 26th of January 2023.

Proof of Hand-Delivered Notifications

Executive Summary documents were hand-delivered to adjacent landowners and occupiers along the road on Thursday, the 26th of January 2023, to notify them of the proposed project.

Concerns Raised by I&APs

Comments received from I&APs were recorded in a stakeholder database, acknowledged through personal letters, and forwarded to the relevant environmental specialists for consideration.

A copy of the Pre-Application Draft BAR was made available on KAPPEC's website on Thursday, the 26th of January 2023, with links to the document also shared via WeTransfer.

The Public Participation process culminated in the compilation of a Comments and Responses Table, where the comments and concerns raised by I&APs were listed alongside their names and means of communication. Responses were provided in the Comments and Responses Table under Appendix F.

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

Department	Official	Address	Tel	Email
Garden Route District Municipality Municipal Manager	Monde Stratu		044 803 1315	mm@gardenroute.gov.za
Eden District Municipality Community Services	Ms Nina Viljoen			nina@gardenroute.gov.za
Mossel Bay Municipality Municipal Manager	Mr Colin Puren		044 606 5000	mmoffice@mosselbay.gov.za
Mossel Bay Municipality Ward Councillor Ward 14	Mr Donovan Claassen		061 515 2217	dclaassen@mosselbay.gov.za
Mossel Bay Municipality Environmental Management	Mr Rudi Minnie			rminnie@mosselbay.gov.za
Mossel Bay Municipality	Mr Altus Eitner	P O Box 25, Mossel Bay; 6500	(044) 606-5163	aeitner@mosselbay.gov.za
Mossel Bay Municipality Head Technical Services	Mr Dick Naidoo	P O Box 25, Mossel Bay; 6500		dnaidoo@mosselbay.gov.za
Mossel Bay Municipality Director Planning and Economic Development	Mr Carel Venter	P O Box 25, Mossel Bay; 6500		cventer@mosselbay.gov.za
DEA&DP: Spatial Planning (Region 3)	Allan Rhodes	Private Bag X 6509 George, 6530	021 483 0764	Allan.Rhodes@westerncape.gov.za
Cape Nature Scientific Services	Megan Simons	Private Bag X6546 George 6530	087 087 3060	msimons@capenature.co.za
Eden District Municipality Biodiversity and Coastal Management Environmental Management	Dr Nina Viljoen	P.O. Box 12 George 6530	044 803 1529	Nina@gardenroute.gov.za

Heritage Western Cape	Waseefa Dhansay	Private Bag X9067 Cape Town 8001	021 483 9543/9680	ceoheritage@westerncape.gov.za waseefa.dhansay@westerncape.gov.za
Civil Aviation Authority Obstacle Inspector	Lizell Stroh		083 461 6660	Strohl@caa.co.za
Breede Gouritz Catchment Management Agency	Rudzani Makahane Nolutando Ndlumbhini	101 York Street, Dormehis Drift, George 6530	023 346 8023	rmakahane@bgcma.co.za nndlumbhini@bgcma.co.za
Department of Agriculture Forestry and Fisheries.	Melanie Koen	101 York Street, Dormehis Drift, George 6530	023 346 80	melaniko@daff.gov.za
Department of Agriculture	Mr Cor van der Walt	Elsenburg		corvdw@elsenburg.com
SubDirectorate: Coastal Management	Ms. Leptieshaam Bekko			leptieshaam.Bekko@westerncape.gov.za

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

Not Applicable

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

Garden Route District Municipality
Department of Agriculture Eden District
Civil Aviation Authority
Department of Agriculture Forestry and Fisheries

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.

Comment with respect to biodiversity was received from DEA&DP and CapeNature respectively;

CapeNature made the following comments:

According to the Western Cape Biodiversity Spatial Plan (Pool-Stanvliet *et al.* 2017)¹ the erf has Other Natural Areas and is outside the extent of Critical Biodiversity Areas and Ecological Support Areas. Furthermore, the erf does not have any freshwater features / National Freshwater Ecosystem Priority Areas (NFEPA)².

The National Biodiversity Assessment (Skowno *et al.* 2018)³ mapped the vegetation as North Langeberg Sandstone Fynbos which is Least Concerned (SANBI 2022).

Following a review of the Pre-Application Draft Basic Assessment Report, Biodiversity Screening Report, and Aquatic Biodiversity Compliance Statement CapeNature wishes to make the following comments:

5. Other Natural Areas have the greatest flexibility in terms of permissible land uses. ONA are defined as: "Areas not currently identified as a priority but retain most of their natural character and perform a range of biodiversity and ecological infrastructure functions. Although not prioritised, they are still an important part of the natural ecosystem."

Although ONAs are not prioritised, they are still an important part of the natural ecosystem. Thus, the objectives of ONA are to: "Minimize habitat and species loss and ensure ecosystem functionality through

strategic landscape planning. Offers flexibility in permissible land-uses, but some authorisation may still be required for high-impact land-uses."

6. The Freshwater Specialist could not find any aquatic features present on erf 21277 however it is still important that the proposed mitigation measures be strictly implemented to avoid negatively impacting the surrounding aquatic habitats.

7. CapeNature reminds the applicant that all endangered species or protected species listed in Schedules 3 and 4 respectively, in terms of the Western Cape Nature Conservation Laws Amendment Act, 2000 (Act No. 3 of 2000) may not be picked or removed without the relevant permit, which must be obtained from CapeNature.

8. The North Langeberg Sandstone Fynbos has experienced low rates of natural habitat loss. The threats to this ecosystem have not been compiled yet, but it is a well protected vegetation unit with 91% of the natural extent remaining (SANBI 2022).

5. The botanist observed elements from the Mossel Bay Shale Renosterveld on the erf. The threat status for this vegetation according to the revised list of ecosystems that are threatened and in need of protection (NEM:BA 2022)5 is **Critically Endangered**.

According to the National Biodiversity Assessment the Mossel Bay Shale Renosterveld is one of seven high risk critically endangered vegetation types in South Africa (Skowno *et al.* 2018) which is not protected and only 38% of the natural extent remains which places this vegetation unit at risk of collapsing (SANBI 2022).

6. The Species of Conservation Concern (SCC) are clustered in the southeast section of the erf (Map 4 of the botanical report) which will be rezoned to Portion A (proposed industrial zone) and the proposed mitigation measure is to translocate these species to another site.

6.1. A similar development was proposed for a property in proximity with the same vegetation unit. It was concluded that Search and Rescue of SCC would not be a viable mitigation measure as the plants will not survive the transplanting process. Thus, has a site been identified to translocate the SCC from erf 21277? The Botanist must also assess what the success rates would be for translocation SCC.

Mark Berry has subsequently compiled a detailed Search and Rescue Plan, dated February 2024, outlining the following requirements;

- *Plant species considered suitable for search and rescue include certain succulents and geophytes. *Carpobrotus cf. deliciosus*, *Acrodon bellidiflorus*, *Adromischus caryophyllaceus*, *Crassula cultrate*, *Euphorbia procumbens*, *Hypoxis villosa*, *Ledebouria revoluta*, *Ornithogalum dubium*, *Ornithogalum juncifolium*, and *Satyrium membranaceum*.*
- *A large number (50-100 plants) of *Euphorbia procumbens* were recorded, mainly along the southern boundary of the site. An effort should be made to salvage as many as possible of these. *Carpobrotus cf. deliciosus* can be partly or wholly removed for replanting purposes.*
- *With regards to the S&R of bulb species, the best time for removal is during leaf fall ('blaarval'). In other words, toward the end of the growth period, but before or after the flowering.*
- *For most flowering bulb species in the Western Cape, this will be towards the end of the winter season (maybe early spring for the Southern Cape).*
- *The bulbs should then be removed along with some soil, placed in gel, bagged and then taken to a nursery for temporary storage or transplanted directly in the receiving area.*
- *The best time for planting is during the rainy seasons (March & October). A development area 3.2 km northeast of the site has been identified as a suitable planting (receiving) area for the S&R material.*

6.2. CapeNature is of the opinion that the cluster with SCC must be excluded and protected from the proposed development unless a suitable site with similar microclimate and geological conditions can be

identified and when a high success rate has been confirmed. Furthermore, it will be important that an experienced Environmental Control Officer (with botanical knowledge) be appointed to oversee the removal of the plants.

Please refer to the EMP for a detailed Search and Rescue procedure compiled by Botanist Mark Berry for the translocation location and suitability of the location for the proposed bulbs and succulents. It is of the botanist's opinion that the identified SCCs cannot be searched and rescued individually. The specialist recommends that;

"Best would be to try and salvage some of the topsoil containing their seed, and distribute it where rehab is needed. The latter can be on site (if only a part of the site is developed) or a nearby disturbed area of the same veg type. I suppose u can also collect seedbearing plant material for placement on disturbed surfaces whatever makes sense."

7. The botanist does acknowledge the site is disturbed but also mentioned the degraded fynbos does have potential to fully recover. Furthermore, the botanist also observed a high diversity of indigenous species which he mentioned can revert to the original vegetation if agricultural practices are ceased. Rehabilitation success will be minimal after development, as stated in the report. Thus, the proposed development will result in the complete transformation. Considering the rapid increase in development within the Mossel Bay, specifically Aalwyndal, it remains crucial to prevent further fragmentation, habitat loss, and transformation of across the landscape.

9. Due to the presence of SCC, Presence of elements of the **Critically Endangered** Mossel Bay Shale Renosterveld, and the site having a potential to recover to its original state, the site should be viewed as sensitive. If the proposed activity will continue the loss of SCC will have a local impact, but the impact regionally should be determined.

Please refer the Section H for the proposed amendments.

In terms of biodiversity, DEA&DP also provided comments:

From the information contained in the pre-app BAR it is understood that Erf 21277 is used as a horse paddock and for grazing. Historic aerial imagery suggests that this land use commenced between 13 September 2013 and 22 March 2016. Therefore, the property was used for agricultural purposes. Furthermore, it is understood that Erf 21277 (ca. 7.7ha) will be subdivided and the resultant Portion A rezoned from Single Residential Zone I to Industrial Zone I to accommodate the storage facility.

In light of the above, this Department is of the considered view that the proposed development triggers Activity 28 of Listing Notice 1 (Government Notice No. R. 983 of 4 December 2014, as amended).

In light of the above, please be advised that only those activities applied for shall be considered for authorisation. The onus is on the proponent to ensure that all the applicable listed activities are applied for and assessed as part of the Basic Assessment process.

Please refer to Section D for revised amendments.

2.3. Specialist reports:

Biodiversity Assessment by Mark Berry Environmental Consultants

The findings of the Biodiversity Assessment have been noted. According to the assessment the vegetation on the property has been disturbed as a result of the agricultural activities but that only a small portion of the site (ca. 0.4ha in the northwestern corner of the site) has completely transformed due to the agricultural

activities. The assessment states that the remainder of the disturbed area has the potential to fully recover if allowed to rest.

Furthermore, the assessment identified three Species of Conservation Concern, namely *Hermannia lavandulifolia* (VU), *Polygala pubiflora* (VU) and *Ruellia pilosa* (VU). A large number of *Euphorbia procumbens* was also recorded by the specialist, along the southern boundary. According to the assessment, the numbers of this plant along the Garden Route is low. A **search and rescue procedure** is therefore recommended; but only if it can be demonstrated that a high transplant success rate can be achieved. If this cannot be achieved, the impacts on this biodiversity must be avoided, only where they cannot be avoided they must be mitigated. All biodiversity mitigation options must be reported on.

As per the above, please refer to the EMP for a detailed Search and Rescue procedure compiled by Botanist Mark Berry for the translocation location and suitability of the location for the proposed bulbs and succulents. It is of the botanist's opinion that the identified SCCs cannot be search and rescued individually. The specialist recommends that;

"Best would be to try and salvage some of the topsoil containing their seed, and distribute it where rehab is needed. The latter can be on site (if only a part of the site is developed) or a nearby disturbed area of the same veg type. I suppose u can also collect seedbearing plant material for placement on disturbed surfaces whatever makes sense."

In this regard, please be advised that all endangered species or protected species listed in Schedules 3 and 4 respectively of the Western Cape Nature Conservation Laws Amendment Act, 2000 (Act No. 3 of 2000) may not be picked or removed without the relevant permit from CapeNature.

Aquatic Biodiversity Verification Assessment by DDK Consulting

The Department notes that there are no aquatic features within the boundaries of the subject property. The nearest aquatic feature is approximately 420m northeast of the proposal and the expected impact thereon is considered low.

In light of the above, the proposal may require Water Use Authorisation in terms of Section 21(c) and (i) of the National Water Act, Act No. 36 of 1998 ("NWA") (i.e. any activity within the regulated area of a wetland or river). Therefore, you are advised to consult the Breede-Gouritz Catchment Management Agency to clarify the applicability of the NWA.

A Section 21(c) & (i) Risk Assessment Matrix as it pertains to the National Water Act, 1998 (Act No. 36 of 1998) was compiled related to the potential impacts of the development proposal on this Channelled Valley-Bottom (CVB) Wetland System. The proposed development will be located within 500 metres of this wetland system (within the regulated area) in accordance with General Notice 509 of 2016 for Section 21(c) and 21(i) Water Uses of the National Water Act, 1998 (Act 36 of 1998). Based on the outcome of the Section 21(c) & (i) Risk Assessment, the proposed activities associated with the construction and establishment of the proposed Mossel Bay Storage facility has been assessed to have a Low-Risk Significance (with mitigation) on the water source identified.

The author is also of the opinion that the legislative requirement for the proposed storage development on a portion of Erf 21277 in Aalwyndal to register a GA (General Authorisation) in terms of the National Water Act, 1996 (Act No. 36 of 1998) for Section 21 (c) & (i) water use activities, with the Breede-Olifants Catchment Management Agency (BOCMA) could potentially be waived given the associated Low Risk Significance of anticipated impacts together with the significant distance (>400m) of the concerned property to the identified water resource.

The potential waiving of the requirement to register a GA should, however, be supported and confirmed by the Breede-Olifants Catchment Management Agency.

According to Rudzani Makahane from BOCMA, sent via email in correspondence to the revised Aquatic Assessment Report, the following confirmation pertaining to the above has been obtained, "Your request has been granted and the GA is therefore not required."

Civil Aviation

With reference to this Department's letter issued on 4 June 2021, a Civil Aviation Compliance Statement must be prepared due to the close proximity of the proposed development to the Mossel Bay Aerodrome. However, such statement has not been included as part of the pre-app BAR.

In light of the above, you are hereby advised that the relevant information and comment from the Civil Aviation Authority in respect of the proposal must be included in the Draft BAR.

Please refer to Sections C and H of this BAR for the findings of the Civil Aviation specialist, CASS.

2.5. Environmental Management Programme

The contents of the Environmental Management Programme ("EMPr") must meet the requirements outlined in Section 24N (2) and (3) of the NEMA (as amended) and Appendix 4 of GN No. R. 982 of 4 December 2014. The EMP must address the potential environmental impacts of the activity throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing).

This Department has reviewed the EMPr as included and received as part of the pre-app BAR. The following aspects must be addressed:

Monitoring / Reporting

According to Section 3.1 of the EMPr an independent Environmental Control Officer ("ECO") must be appointed which will be responsible for fortnightly audits on compliance to the conditions of an Environmental authorisation and the EMPr. A clear distinction must be made between the environmental monitoring reports and postconstruction rehabilitation reports by the ECO and the environmental audit report to be compiled by an independent person with the relevant environmental auditing expertise. In this regard, please note that the environmental auditor cannot be the EAP or the ECO.

Furthermore, take note of the auditing requirements with regard to environmental authorisations and EMPr's under Regulation 34 of the EIA Regulations, 2014 (as amended). In this regard, the EMPr must be amended to ensure compliance with the requirements. The contents of the environmental audit report must comply with Appendix 7 of the EIA Regulations.

Search and Rescue

As referenced under Point 2.3 of this letter, the botanical specialist recorded three Species of Conservation Concern as well as *Euphorbia procumbens* which as low numbers within the Garden Route District. Furthermore, the botanical specialist recorded the presence of *Homopus areolatus* (common padloper / parrot-beaked tortoise). Although, a section dealing search and rescue of fauna and flora (page 37 of the EMPr) has been included in the EMPr, the site specific information has not been described in the EMPr.

In light of the above, the search and rescue procedure described on page 37 (Fauna and Flora) is not considered adequate. As such, a more comprehensive description of the Search and Rescue procedure (what, when, where, how) must be described in the EMPr in order to increase the success of the search and rescue operation.

Please refer to the attached and incorporated Search and Rescue Plan drafted by Mark Berry further elaborating and providing a more comprehensive description of the Search and Rescue procedure (what, when, where, how) as briefly discussed above.

Map with environmental sensitivities.

The EMPr must include a map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers.

DEA&DP further comments on:

Provision of Engineering Services

According to the information in the pre-app BAR the need for water, electricity and sewage disposal is very limited due to the nature of the development proposal. In this regard the pre-app BAR indicates that a septic tank system will be proposed for the administrative office building. However, the document also indicates that a conservancy tank will be installed, which will be serviced by a private contractor. This contradictory information in the pre-app BAR must be clarified.

Notwithstanding the above, sewage disposal by means of a septic tank and soakaway system is not supported by the Department. Sewage generated as a result of the proposed development should be disposed of by means of a waterborne gravity sewer network connected to the existing municipal sewer network and disposed of at a licensed waste management facility / sewage treatment plant with sufficient unallocated sewage treatment capacity. However, the disposal of sewage by means of a conservancy tank, which is emptied regularly by a contractor and disposed of at a licensed waste management facility / sewage treatment plant with sufficient unallocated sewage treatment capacity, can be supported by this Department. The Mossel Bay Municipality must confirm in writing that unallocated sewage treatment capacity is available to service both the phased and completed (total) expected sewage output load for this proposed application, or sufficient approved unallocated capacity able to accommodate the abovementioned application in future.

Changes to correct and corresponding terminology will be subsequently made and the requested confirmation letter of services capacity from the Mossel Bay Municipality has herewith been attached as Appendix....

Furthermore,

Curriculum vitae of the author

The EMPr does not include a copy of the curriculum vitae of the author of the document. In accordance with Appendix 4 of the EIA Regulations, 2014 (as amended) a copy of the EAP who compiled the EMPr must be included in the EMPr. *The CV of the EAP has subsequently been included in the EMP.*

General

It is requested that the terminology in the EMPr related to the execution of tasks be checked for consistency. Terms such as "should" and "may", which do not provide clear instruction or cannot be enforced, must be avoided in the document. It is advised that terms such as "must" and "will", which provide clear instruction, be used instead. Furthermore, the EMPr is very generic and describes procedures which may not be relevant to the development or operation of the proposed development e.g. bitumen handling, use and handling of dangerous and toxic materials, etc. Also, the EMPr contains a section i.e. "Previous Environmental Application" (page 6) which is not relevant to this proposal and seems to be related to a project in Cape Town.

In light of the above, the EMPr must be reviewed and the aspects related to occupational health and safety aspects, which falls within the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993) and Regulations be considered for inclusion as an appendix to the EMPr.

The EMP has subsequently been revised and amended accordingly.

3. Requirements of an EAP

With reference to Point 4.1 of this Department's letter of 6 February 2023 please be reminded that the person appointed to hold the primary responsibility for the planning, management, coordination, and execution of the tasks contemplated in Regulation 14 of the Section 24H Registration Authority Regulations, 2016 (Government Notice 849 dated 22 July 2016, as amended) must be registered with Environmental Assessment Practitioners Association of South Africa (EAPASA).

In accordance with Regulation 12(a) of the Environmental impact Assessment Regulations, 2014, an applicant must appoint an EAP to manage the application for Environmental Authorisation.

Please be reminded that as of 8 August 2022, the person appointed to hold the primary responsibility for the planning, management, co-ordination, and execution of the tasks contemplated in Regulation 14 of the Section 24H Registration Authority Regulations, 2016 (Government Notice 849 dated 22 July 2016, as amended) must be registered with Environmental Assessment Practitioners Association of South Africa (EAPASA). As from the 8th of August 2022, if anyone is found practicing without being registered, the person is engaging in fraudulent or illegal practices, unless the provisions of Regulation 21 of Section 24H Registration Authority Regulations, 2016 (as amended) apply.

Therefore, if the person appointed to perform the tasks is unregistered, he/she may submit representations to the competent authority in support of considering the applicability of Regulation 21 of Section 24H Registration Authority Regulations, 2016 (as amended). However, if it is found that Regulation 21 does not apply, a registered EAP will need to be appointed to manage the application.

Please submit such representation(s) at your earliest convenience (inter alia copy of your letter of appointment; description of the tasks that have been initiated as described in Regulation 14 of the Section 24H Registration Authority Regulations, 2016 (as amended)).

Further to the above, this Department has received correspondence from Mr. Renier Kapp on 16 February 2023 which clarifies the working relationship between. According to the agreement GNEC has dedicated a registered Environmental Assessment Practitioner ("EAP"), Ms. Euonell Visagie, to KAPPEC to fulfil the requirements of all applications for environmental authorisation in respect of the responsibility for the tasks for the planning, management, co-ordination, and execution of the tasks until such time that Mr. Kapp is registered with EAPASA. The agreement indicates that these tasks will extent to all internal and external meetings, required report writing, management and execution of tasks.

However, with regard to any additional submissions in terms of Regulation 21 of the Section 24H Registration Authority Regulations, 2016 (as amended), the implementation of this agreement in the application phase and which tasks as described in Regulation 14 of the Section 24H Registration Authority Regulations, 2016 have been undertaken by which person in respect of the Basic Assessment Report, must first be clarified prior to submitting the Application for environmental authorisation.

Mossel Bay Municipality: Town/Spatial Panning commented on the proximity of Erf 21277 to the Mossel Bay aerodrome and requested that comment and compliance from the Civil Authority be received.

An Aviation Impact Assessment was conducted by Tappas Aviation Consultant in January 2024, discussing the potential of the proposed development to interfere with the Obstacle Limited Surfaces of airports in the vicinity of the project area or to interfere with any other aviation promulgated areas surrounding the development footprint. The findings have been recorded and included in Section C of the 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?	YES	NO
1.2.	Provide the name and or company who conducted the specialist study.	Not applicable	
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.	Not applicable	
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.	Not applicable	

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.	On March 2022 DDK Consulting conducted an Aquatic Biodiversity Compliance Statement & Section 21 (C) & (I) Risk Assessment on Portion A of Erf 21277 Aalwyndal.	
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		

An Aquatic Biodiversity Compliance Statement was conducted, and the following statement is of consideration.

The Site Investigation confirmed the presence of a natural Channelled Valley-Bottom (CVB) Wetland Area associated with a Non-Perennial Drainage Line situated approximately 420 metres northeast of the proposed development footprint and a Depression Wetland associated with the Mossel Bay Aerodrome situated approximately 800 metres southwest of the concerned development footprint. No aquatic resources were discovered on the concerned portion of Erf 21277 directly.

A Section 21(c) & (i) Risk Assessment Matrix as it pertains to the National Water Act, 1998 (Act No. 36 of 1998) was compiled related to the potential impacts of the development proposal on this Channelled Valley-Bottom (CVB) Wetland System. The proposed development will be located within 500 metres of this wetland system (within the regulated area) in accordance with General Notice 509 of 2016 for Section 21(c) and 21(i) Water Uses of the National Water Act, 1998 (Act 36 of 1998). Based on the outcome of the Section 21(c) & (i) Risk Assessment, the proposed activities associated with the construction and establishment of the proposed Mossel Bay Storage facility has been assessed to have a Low-Risk Significance (with mitigation) on the water source identified.

The author is also of the opinion that the legislative requirement for the proposed storage and solar development on a portion of Erf 21277 in Aalwyndal to register a GA (General Authorisation) in terms of the National Water Act, 1996 (Act No. 36 of 1998) for Section 21 (c) & (i) water use activities, with the BreedeOlifants Catchment Management Agency (BOCMA) could potentially be waived given the associated Low Risk Significance of anticipated impacts together with the significant distance (>400m) of the concerned property to the identified water resource.

The potential waiving of the requirement to register a GA should, however, be supported and confirmed by the Breede-Olifants Catchment Management Agency.

According to Rudzani Makahane from BOCMA, sent via email in correspondence to the revised Aquatic Assessment Report, the following confirmation pertaining to the above has been obtained, "Your request has been granted and the GA is therefore not required."

As a result, no aquatic features occur on the site, and therefore the EAP is disputing the Very High Aquatic Sensitivity determined by the Screening Tool. The proposed structures/infrastructure was assessed to have minimal impact on this wetland system given the location of the development proposal in relation to this aquatic system (>400 metres), the relatively small scale of the development, the fact that, although limiting, will still allow for free movement of water and sediments through this system and the Present Ecological State of this wetland system which was assessed to be Largely Modified (PES Category D) as a result of historical anthropogenic factors. Therefore, the proposed development will not have an impact on any surface or groundwater aquatic resources and mitigation measures have been suggested to limit any factors that might have an impact on the Channelled Valley-Bottom (CVB) Wetland System.

The Aquatic study outlined key mitigation measures to lessen the impact on the above mentioned watercourses during the construction and operational phases.

- Contractor laydown areas are to be established outside of the 500-metre Regulatory Zone of the wetland system and only for a short duration in consultation with the competent authority.
- All development footprint areas to remain as small as feasibly possible and vegetation clearing to be limited to what is absolutely essential to complete the required works.
- Construction Activities should preferably be undertaken during the drier summer months, to minimise the impact on the Hydrological & Geomorphological Functioning of the wetland system.

- All construction debris and litter must be removed. It may be temporarily stockpiled outside the extent of the 500-metre regulatory buffer zone but must be removed and disposed of at a licensed Processing Facility at regular intervals as specified in the legally binding Environmental Management Plan (EMP) approved by the Competent Authority.
- Care must be taken, and all construction personnel must receive training on the risks of chemical contamination of the wetland area.
- Chemical spills within and surrounding the 500-metre wetland regulatory buffer zone should be immediately remediated utilizing an Emergency Spill Response Procedure to form part of the legally binding Environmental Management Plan (EMP) approved by the Competent Authority.

Direct and indirect impacts identified within water resources bordering residential developments include an increase in alien and invasive species entering these systems due to regular disturbance of soil and removal of indigenous vegetation. The result is greater inputs of sediments and nutrients from associated stormwater runoff. The impacts on the Channelled Valley-Bottom (CVB) Wetland area associated with the concerned development proposal is unlikely to add to the cumulative effect on the loss and functioning of aquatic systems within the region since no significant impacts were identified and these impacts will be localised to the cadastral boundary of the concerned property. The majority of the anticipated impacts to the Channelled Valley-Bottom (CVB) Wetland are indirect and associated with the potential conveyance of contaminated water or excess sediment loads from the construction activities. Given the proposed mitigation measures are adequately implemented and audited, it is the opinion of the author, that these impacts to the Channelled Valley-Bottom (CVB) Wetland can be mitigated to acceptable levels of disturbance, whilst still considering the need & desirability of the development proposal.

Additional mitigation is expressed below;

Vehicular Access

- All construction vehicles must be regularly inspected for leaks. Re-fuelling must take place on a sealed surface area to prevent the ingress of hydrocarbons into the topsoil.
- In the event of a vehicle breakdown, maintenance of vehicles must take place with care and the recollection of spillage should be practised near the surface area to prevent the ingress of hydrocarbons into the topsoil.
- All spills should they occur, should be immediately cleaned up and treated accordingly.

Soil

- Sheet runoff from excavations and stockpiles should be slowed down by the strategic placement of silt traps in accordance with the legally binding Environmental Management Plan (EMP).
- As far as feasibly possible, all construction activities should occur during the dry summer months (December - February).
- All stockpiles are to be protected with a suitable geotextile to prevent sedimentation.

3. Coastal Environment

3.1.	Was a specialist study conducted?	YES	NO
3.2.	Provide the name and/or company who conducted the specialist study.		
Not applicable			
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.		
Not applicable			
3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.		
Not applicable			

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.
Not applicable	

4. Biodiversity

4.1.	Were specialist studies conducted?	YES	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		
A Botanical Survey of the site was undertaken on 26 December 2020 by Mark Berry, an independent biodiversity specialist (Mark Berry Environmental Consultants). A qualitative assessment of the type and condition of affected vegetation on site, disturbance and presence of alien species, SCC and protected species was carried out.			
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.		
All available constraints maps located on Cape Farm Mapper were utilized to identify and possible constraints to development, or sensitive aspects which might require specialist inputs. Plant species not identified in the field, were collected and/or photographed and identified at the office and Compton (Kirstenbosch) Herbarium. The 2018 South African Vegetation Map and the latest floristic taxonomic literature and reference books were used for the purpose of this specialist study. Any plants classified as rare or endangered in the Red List of South African Plants online database are highlighted. The assessment follows NEMA, CapeNature and other relevant guidelines for biodiversity assessments. Species listed as vulnerable were mapped using Easy GPS v2.5 software on an iPhone. Accuracy is given as ±4 m. Refer to the below biodiversity constraints map which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers. Figure 17: Biodiversity constraints map which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers.			
4.4.	Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.		

The Western Cape Biodiversity Spatial Plan's desired management objectives are categorised as whether the site falls within a Protected Area, Critical Biodiversity Area 1 or 2, Ecological Support Area 1 or 2, Natural to near-natural Area or no natural remaining area. Based on the findings the site comprises a grazing area covered by degraded fynbos which has a significant effect on the categorisation of the proposed site.

According to the 3422 AA Mossel Bay 1:50 000 geological map, the site is underlain by Table Mountain Group sandstone. The base rock comprises Skurweberg Formation, which is described as a light-grey quartzitic sandstone. The entire marine planed flat area of Aalwyndal is made up of this unit, which is best exposed along the coast between Cape St Blaize and Dana Bay (Figure 9).

Being well represented in the larger area, North Langeberg Sandstone Fynbos is not currently listed as a threatened vegetation type (DEA 2011). About 92% of it remains, while 13% is formally conserved in the Boosmansbos Wilderness Area and an additional 45% in mountain catchment areas. This rating is reaffirmed in the 2018 National Biodiversity Assessment. The site does not form part of the Mossel Bay CBA network. It is located between two aquatic ecological support areas (drainage lines), with a large critical biodiversity area (CBA) located further away to the west. CBAs are defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure. These sites are selected to meet national targets for species, habitats and ecological processes. Many of these areas support known occurrences of threatened plant species, and/or may be essential elements of designated ecological corridors. Loss of designated CBAs is therefore not recommended. The project will not impact significantly on the biodiversity network as currently presented (Figure 10).

The site occurs in a typical coastal fynbos environment. This is confirmed by the presence of fynbos species, such as *Aspalathus opaca*, *Metalasia acuta* and several *Herichrysum* species. Typical fynbos species, such as ericas and proteas, are however absent, probably due to the disturbed state of the site. These species were noted on nearby sites where relatively undisturbed fynbos were encountered. According to the South African Vegetation Map, the vegetation occurring on site and the surrounding area has been mapped as North Langeberg Sandstone Fynbos. Mossel Bay Shale Renosterveld and Hartenbos Dune Thicket (along the coast) occur further away to the northeast and south.

While the vegetation found on site can be described as fynbos, it also shows an affinity with Mossel Bay Shale Renosterveld with the presence of renosterveld species such as *Elytropappus rhinocerotis*, *Oedera genistifolia* and *Barleria pungens*. Structurally, it can be described as a dwarf (<0.25 m) closed shrubland following Campbell's (1981) classification. The vegetation is a bit higher in certain areas where the shrub component is less disturbed. *Cynodon dactylon* (kweek) and *Helichrysum niveum* are dominant ground covers. The fynbos shows heavy disturbance by grazing and some alien infestation, notably *Acacia cyclops* (rooikrans) and *Cynodon dactylon*. However, due to a fairly high diversity of indigenous species encountered it should revert back to the original vegetation if further farming (grazing) activities are ceased (Appendix C).

Other Natural Areas have the greatest flexibility in terms of permissible land uses. ONA are defined as: "Areas not currently identified as a priority but retain most of their natural character and perform a range of biodiversity and ecological infrastructure functions. Although not prioritised, they are still an important part of the natural ecosystem."

Although ONAs are not prioritised, they are still an important part of the natural ecosystem. Thus, the objectives of ONA are to : " Minimize habitat and species loss and ensure ecosystem functionality through strategic landscape planning. Offers flexibility in permissible land-uses, but some authorisation may still be required for high-impact land-uses."

Many Indigenous shrub species were found during the site visit, three Species of Conservation Concern were recorded on site, namely *Hermannia lavandulifolia* (Vul), *Polygala pubiflora* (Vul) and *Ruellia pilosa* (Vul). According to the online Red List 2 of South African Plants, they are all under threat from crop cultivation, coastal developments and alien infestation. *Polygala pubiflora* is a regional endemic, mostly found in renosterveld remnants. It is still frequently encountered (by the author and others) in the Mossel Bay area, but never in large numbers. It is difficult to spot when not in flower. *Hermannia lavandulifolia* is still well represented in the Mossel Bay area and is frequently encountered. A large number (50-100 plants) of *Euphorbia procumbens* were also recorded, mainly along the southern boundary of the site. Despite being widespread between Riversdale and the Eastern Cape and not listed as threatened, its numbers are very low, with only a few records along the Garden Route.

It is recommended that should development proceed these plants be searched and rescued and replanted in a suitable area nearby where it can be protected into perpetuity.

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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The property is currently 7.7ha in extent and only 1.44 ha of said extent will be developed into a storage facility. Only a small area (<0.4 ha) in the north-western corner of the site can possibly be described as completely transformed due to agricultural activities. The remainder of the site comprises fynbos in a degraded state, but with potential to fully recover if allowed to rest. The potential for rehabilitation of parts of the site after the development also seems slim, unless landscaping is needed using indigenous species. Given the disturbed state of the site, the impact on vegetation type per se is of a low to moderate concern. The impact will be slightly more for the encountered Species of Conservation Concern, which are mostly still well represented in the larger Mossel Bay area. As a mitigation measure (if development is allowed to proceed), consideration should be given to the search and rescue of *Euphorbia procumbens* of which there are between 50 and 100 plants on site.

North Langeberg Sandstone Fynbos is not currently listed as a threatened vegetation type (DEA 2011). About 92% of it remains, while 13% is formally conserved in the Boosmansbos Wilderness Area and an additional 45% in mountain catchment areas. This rating is reaffirmed in the 2018 National Biodiversity Assessment. The site does not form part of the Mossel Bay CBA network. It is located between two aquatic ecological support areas (drainage lines), with a large critical biodiversity area (CBA) located further away to the west. CBA's are defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure. These sites are selected for meeting national targets for species, habitats and ecological processes. Many of these areas support known occurrences of threatened plant species, and/or may be essential elements of designated ecological corridors. Loss of designated CBA's is therefore not recommended. The project will not impact significantly on the biodiversity network as currently presented.

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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Not Applicable

4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.
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The animal species identified by the Screening tool are as follows:

- *Circus maurus* - Black Harrier
- *Neotis denhami* - Denham's bustard
- *Circus ranivorus*- African marsh harrier
- *Aneuryphymus montanus* -Yellow-winged Agile Grasshopper
- *Lepidochrysops littoralis*- Coastal Blue Butterfly
- *Bradypterus sylvaticus* - Knysna warbler
- *Camphetera notata* - Knysna woodpecker

Neotis denhami generally occupies cultivated pastures, agricultural croplands and natural vegetation, but has a wide fragmented Afrotropical range, which does not place a limitation on the specific location of their habitat. *Circus ranivorus* occupy marsh and wetland habitats. *Aneuryphymus montanus* is a vulnerable species on SANBI's list and the main threats to this species are conversion of its habitat into farmland and invasions of non-native plant species. *Lepidochrysops littoralis* generally occur in rocky limestone ridges or sand dunes in coastal fynbos and has a limited distribution, as a result *L. littoralis* is qualified globally under the IUCN criteria as Endangered under criterion B. Even though *Bradypterus sylvaticus* is classified as a vulnerable species, they have a rather sparse distribution and since the site of proposed development is rather disturbed, such population patterns will not be severely impacted.

Based on the species descriptions on SANBI's website, the majority of these animal species are mobile, and make use of marsh, coastal and wetland area, which habitat is not immediate on the proposed development site, and thus they are unlikely to be disturbed by the proposed development as they can move away from the disturbance into the surrounding agricultural and natural areas.

During the site visit, it was observed that none of the eight Species of Conservation Concern (SCC) identified in the screening tool report were present. The vegetation around the site is too disturbed and close to human habitation for more sensitive species like *C. maurus*, *C. ranivorus*, and *N. denhami* to be found there. *C. maurus* and *N. denhami* might exist in similar but less disturbed areas further west of the site, whereas *C. ranivorus* would require a nearby wetland, which is absent.

A. montanus is highly unlikely to be present at the site due to its preference for arid fynbos vegetation on rocky substrates, which contrasts with the vegetation structure at the site. Furthermore, the nearest sighting of this species is over 90 km away. *L. littoralis*, another insect SCC, is also improbable to be found at the site because its typical habitats are limestone outcrops or coastal fynbos, neither of which are present at this location.

Sensitive Species 5 is not expected to be at the site, as it is restricted to specific reserves in the Western Cape where it has been reintroduced, and the study site does not offer enough prey to sustain this species.

Similarly, *B. sylvaticus* and *C. notata*, both bird species, are unlikely to be found at the study site due to the sparse vegetation cover, especially of large shrubs and trees, which these species require.

The site visit recorded a total of 25 animal species, including seven bird, 15 insect, two mammal, and one reptile species. None of these species are of conservation concern, but noteworthy sightings included the Spotted veld antlion, Amethyst small fruit chafer, and a Parrot-beaked tortoise.

Please refer to the extract from the Animal Specialist Report that summarizes the sensitivity of each SCC identified by the screening tool.

Common name	Threat Status		Habitat requirements	Likelihood of occurrence
	International	National		
Black harrier <i>Circus maurus</i>	Endangered	Endangered	Fynbos, grasslands, and other similar open vegetation. Also utilises agricultural fields.	Very low There is no suitable habitat of sufficient size at the study site to support this species.
	Decreasing (251 – 999 mature individuals)	Decreasing (85% in past 100 years; < 1000 mature individuals)		
Denham's bustard <i>Neotis denhami</i>	Near-threatened	Vulnerable	Grassland, lowland fynbos, and cultivated fields.	Very low There is no suitable habitat of sufficient size at the study site to support this species, and the study site is located close to human habitation.
	Decreasing	Decreasing (<5 000 adult individuals)		
African marsh-harrier <i>Circus ranivorus</i>	Least Concern	Endangered	Estuaries and large wetlands with sufficient reedbeds for food and breeding	Very low There is no suitable habitat of sufficient size at the study site to support this species.
	Decreasing	Decreasing (<2 500 adult individuals)		
Yellow-winged agile grasshopper <i>Aneuryphymus montanus</i>	Vulnerable	Vulnerable	Dry, sclerophyllous fynbos in rocky foothills.	Very low Not known from the area, and no suitable habitat present at the study site.
	Unknown population trend	Likely declining No population estimates, and rarely collected.		
Coastal blue butterfly <i>Lepidochrysops littoralis</i>	Endangered	Endangered	Rocky limestone ridges or sand dunes in coastal fynbos.	Low Not known from the study site; habitat likely not suitable.
	Unknown population trend	Decreasing (Known from 10 locations between Bredasdorp and Mossel Bay; no population estimate).		

Sensitive Species 5 (which cannot be disclosed)	Vulnerable	Vulnerable	Savanna and other open vegetation with sufficient food and few disturbances.	Very low This species does not occur outside fenced protected areas in the Western Cape. The nearest fenced population is 14 km from the study site.
	Decreasing	Stable (583 – 1 045 mature individuals estimated)		
Knysna warbler <i>Bradypterus sylvaticus</i>	Vulnerable	Vulnerable	Forest edges, riparian thickets and coastal thickets where <i>Sideroxylon inermis</i> is present. Also utilises thickets dominated by lantana and bramble.	Very low There is no suitable vegetation present at the study site to support this species, and surrounding vegetation is also not suitable for this species.
	Decreasing	Decreasing (<2 500 adult individuals)		
Knysna woodpecker <i>Campethera notata</i>	Near- threatened	Near-threatened	Forests and dense woodlands, including coastal forests and thickets.	Very low The study area does not support vegetation that is suitable for this species, as it is too sparse and lacks sufficient trees to support this species.
	Stable (1000 – 3300 individuals)	Declining (1 000 – 3 300 mature individuals estimated)		
		Likely declining No population estimates, and rarely collected.		

Due to the absence of all the SCC from the study site, the site sensitivity could be considered Low. Although the entire development footprint will be transformed, the remaining vegetation on the rest of the property will still be contributing as ecological corridors for the plants and animals in the area.

The proposed development will lead to the loss of habitat across the entire study site. To offset this impact, it is advised that the remaining portion of the property, especially towards the west, should be preserved as undisturbed as possible to serve as an ecological corridor. This corridor will aid in connecting fragmented habitats in the landscape.

If any planting is done on the property, such as for windbreaks or ornamental gardens, it is recommended to use locally-indigenous plant species. These plants can provide food and shelter for local animal species.

Instead of using rodenticides, especially anticoagulant rodenticides, for rodent control, it is discouraged. Instead, constructing and installing owl breeding boxes targeting species like the Barn owl or Spotted eagle-owl is recommended. These owl species are native to the Mossel Bay area and can effectively control rodent populations without the risks associated with rodenticides.

Furthermore, planting locally indigenous plants along the property's edge is advised to facilitate the movement of small animals such as insects, birds, mammals, and reptiles. This inclusion of native plants would help mitigate the habitat loss caused by the development, especially in terms of allowing wildlife to move across the landscape.

5. Geographical Aspects

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

The site lies at an elevated position on a small plateau surrounded by undulating coastal plains. A series of rivers and drainage lines bisect the coastal plains at various points, flowing towards the ocean. Mossel Bay is situated on a rocky outcrop that terminates at the Point and the area known as Kwanoqaba borders Aalwyndal to the south. There is a sharp drop in elevation to the south of the site at the edge of the plateau, through which the N2 descends towards Diaz beach and Voorbaai to the north.

Elevation across the site varies from approximately 165 m at the south-eastern corner to approximately 170 m above M.S.L. at the north-western corner. Slopes are moderate across the site not exceeding 1:4 (<25%). Slopes >1:4 increase visual sensitivity due to the need for cut and fill areas needed to accommodate building platforms and roadways.

The topography of the broader landscape comprises undulating hills and valleys. Hillsides are typically rounded with a series of convex slopes alternating with valleys along drainage lines. Ridgelines along the hilltops to the north, south and west of the site limit the view catchment area to a localized extent of a few meters to approximately 4.5 kilometers.

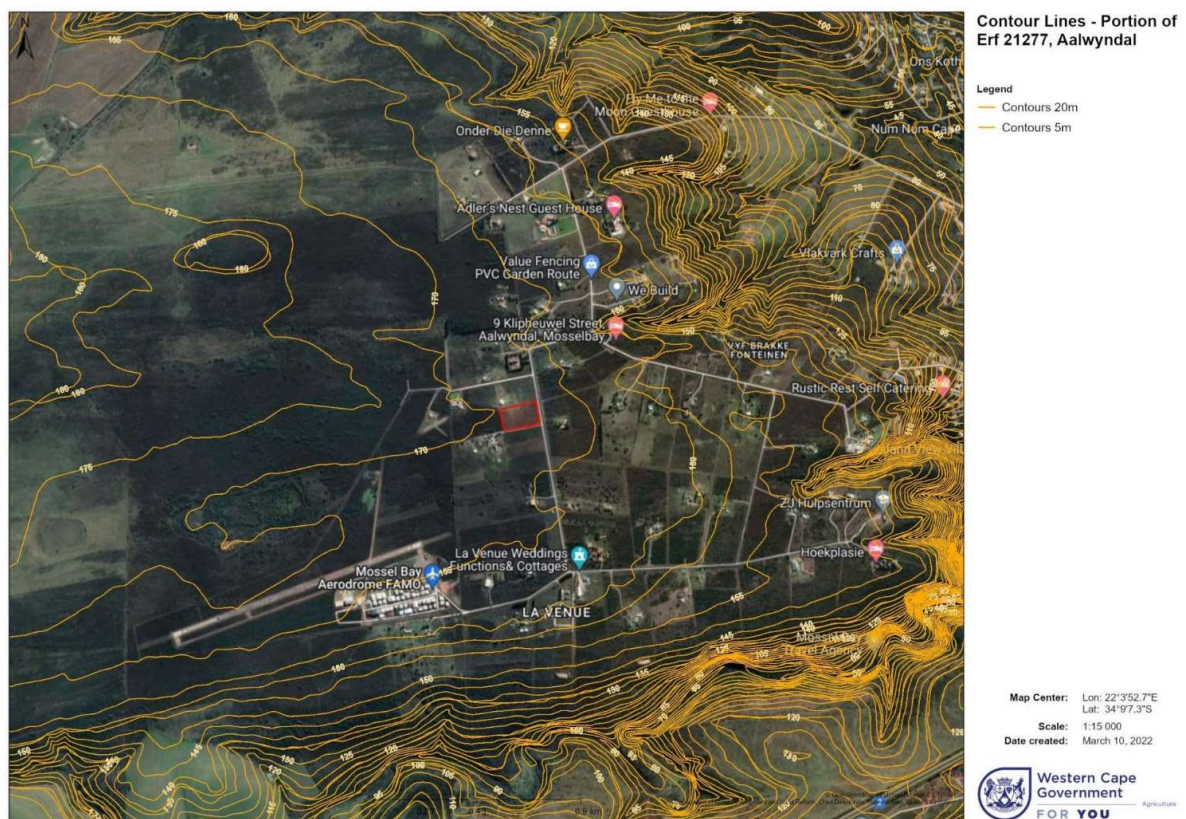
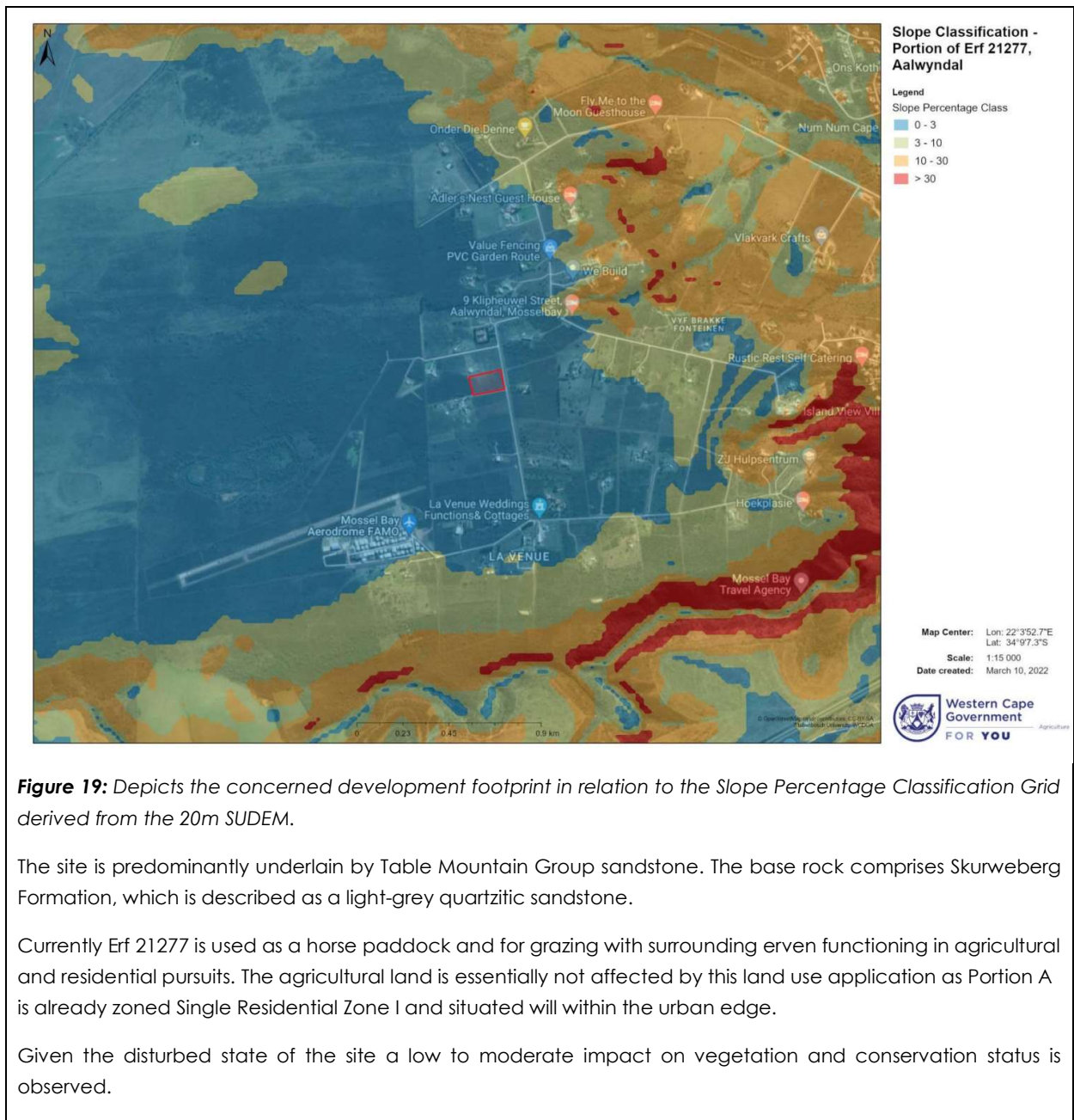


Figure 18: Depicts the concerned development footprint in relation to the 5 and 20-metre interval contour/relief lines.



6. Heritage Resources

6.1.	Was a specialist study conducted?	YES	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
	Jayson Orton, from ASHA Consulting (Pty) Ltd, conducted a Heritage Impact Assessment on 31 October 2022.		
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		

The only potentially significant impact identified is the visual intrusion that a relatively high-density development would have within a low-density rural context. This was assessed as a medium significance impact but with mitigation (landscape plan with screening vegetation) this can be reduced to low significance.

FC Holm CC was appointed to undertake a visual impact assessment for the proposed rezoning and development of a portion of Erf 21277, Aalwyndal, Mossel Bay and conducted said assessment in July 2022.

The proposed development is in line with the future planning for Aalwyndal in terms of the Mossel Bay Spatial Development Framework and Aalwyndal Precinct Plan adopted by the Mossel Bay Municipality. The construction of the Mossel Bay Airfield in recent years has brought about visual changes to the character of Aalwyndal and the type of development that it attracts. The proposed new development on Portion A of Erf 21277 is of a similar type and scale as other developments planned in the near vicinity.

The visual framework presents a mix of developed and undeveloped properties with areas of natural vegetation interspersed with grazing fields and a mix of exotic and indigenous vegetation planted near dwellings and along fence lines. Although Aalwyndal has a sense of rural charm it does not present a distinctive scenic or cultural sense of place that must be protected and scenic, cultural and historical significance of the area is rated as low. The topography of the area furthermore serves to visually isolate Aalwyndal and partially screen views towards the proposed new developments planned for Erf 21277, Mossel Bay, from surrounding developments and scenic routes.

Residents and receptors related to the holiday and tourist industry are rated as highly sensitive and tourism is one of the major economic drivers of the Southern Cape. Although there is some tourist activity in Aalwyndal associated with the Mossel Bay Airfield and Guest Houses and farm accommodation offered, this is not one of the major areas of Mossel Bay associated with the tourist trade. New developments could be partially visible from the N2 view corridor, which has been identified as an important scenic tourist route, but this is at a distance of more than 2 km from the proposed development site at which new developments would not be clearly noticeable to receptors and potential visual impact would be low provided appropriate mitigation measures are put in place.

Although the visual absorption of the development site itself is low due to a lack of screening vegetation and relatively flat topography, the visual absorption capacity of the area is moderate to high due to the screening effect of existing structures and taller vegetation in the areas surrounding the development site. Changes will be brought about to the existing visual environment of Aalwyndal should the proposed development go ahead, but such changes could be absorbed within the existing visual character of the area.

The proposed development will change the character of the site from predominantly open field and grazing areas to light industrial and will exceed 5000 m². Furthermore, the property on which the development is proposed is approximately 14200m² and will be rezoned from Single Residential to Light Industrial. Therefore Section 38(1)(c)(i) and 38(1)(d) will be triggered.

The applicant has readily obtained a Positive Record of Decision (Final Comment) from Heritage Western Cape in terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape Provincial Gazette 6061, Notice 298 of 2003, dated 19 December 2022 (Case no: 21051106SB0525E).

It is recommended that the proposed storage facility be authorised, but subject to the following recommendation which should be included as conditions of authorisation:

- The buildings must make use of visually recessive materials, colours and design principles;

- Fencing to be visually permeable and dark-coloured;
- A landscape plan that includes perimeter planting to screen the development must be compiled prior to the start of construction;
- Night time lighting must be minimised and light fittings must be designed to minimise light spillage;
- If any palaeontological material is found during the course of development then the HWC Fossil Find Procedure should be implemented and the find should be reported to the heritage authorities; and
- If any archaeological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

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.

When Diaz first landed at Mossel Bay in 1487 he named it Angra dos Vagueros. Many other Europeans visited its shores to obtain fresh water and food. The Dutch East India Company (VOC) claimed Mossel Bay in 1734. After a 1784 visit from an English ship, the VOC decided to establish an outpost at Mossel Bay. This was done in 1787 when, after a bumper grain crop, they constructed a store to facilitate the export of the grain. Although a small settlement had sprung up around the store by the end of the 18th century, it was only in 1848 that a small village, then known as Aliwal, came into being. By 1852 there were 30 houses. Many 19th century buildings are preserved within the town and are generally built from local sandstone.

The initial settlement was at the western end of the old town, but this is far away from the study area.

It is evident that the cultural landscape in this instance is a modern semi-rural landscape of smallholdings without any historical character.

8. Socio/Economic Aspects

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

Currently Erf 21277 is used as a horse paddock and for grazing with surrounding erven functioning in agricultural and residential pursuits. The agricultural land is essentially not affected by this land use application as Portion A is already zoned Single Residential Zone I and situated well within the urban edge.

The effective and equitable functioning of land markets is not negatively affected by this land use application. It is stated that all current and future costs to all parties for the provision of infrastructure and social services in land developments must be considered. This land use application will not increase costs to the Municipality but rather increase revenue.

The property falls within the urban edge, within which development proposals will be considered. A further study, The Aalwyndal Precinct Plan, was completed in 2018 to guide future development in Aalwyndal. This area has been earmarked for intensified urban development that will include plans to enlarge the present Mossel Bay Airfield. Erf 21277, Mossel Bay, is situated within the area where noise levels are considered unsuitable for residential purposes and has been identified as suitable for commercial development, including services related to the Airfield such as storage.

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

The proposed storage development will have a positive socio-economic impact in providing employment opportunities during both the constructional and operational phase, both in terms of running the facility and in terms of the business that will be able to operate from the facility. Additionally, this will also bring about economic growth within the area as the access and use of storage is also a common requirement in modern society and this has been identified by the proponent as a need in the area.	
8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area. The proposed storage development will have a positive socio-economic impact in providing employment opportunities during both the constructional and operational phase, both in terms of running the facility and in terms of the business that will be able to operate from the facility. Additionally, this will also bring about economic growth within the area as the access and use of storage is also a common requirement in modern society and this has been identified by the proponent as a need in the area.
8.4.	Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development. The current landscape typology of the Aalwyndal area is a combination of rural-, residential- and commercial/ light industrial activities associated with the Mossel Bay Airfield and a few other sites in the vicinity of the Airfield. Open farmlands and disturbed landscape predominate, interspersed with smaller patches of relatively undisturbed natural vegetation. Although Aalwyndal has a sense of rural charm it does not present a distinctive scenic or cultural sense of place that must be protected and scenic, cultural and historical significance of the area is rated as low. Mitigations such as using specific building materials and finishes that allow the new structures to be visually recessive will allow the development to be complemented with the local sense of place. The construction phase may have short-term localised noise and potential dust impacts, which will be mitigated by measures outlined in the EMPr.

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 alternative lies at an elevated position on a small plateau surrounded by undulating coastal plains. There is a noticeably sharp drop in elevation to the south of the site at the edge of the plateau, through which the N2 descends towards Diaz Beach and Voorbaai to the north. The elevation across the site varies from approximately 165 m at the south-eastern corner to approximately 170 m above M.S.L. at the north-western corner. Slopes are moderate across the site not exceeding 1:4 (<25%). A series of rivers and drainage lines bisect the coastal plains at various points, flowing towards the ocean. Mossel Bay is situated on a rocky outcrop that terminates at the Point and the area known as Kwanoqaba borders Aalwyndal to the south. Topography of the broader landscape comprises undulating hills and valleys. Hillside are typically rounded with a series of convex slopes alternating with valleys along drainage lines. Additionally ridgelines along the hilltops to the north, south and west of the site limit the view catchment area to a localized extent of a few meters to approximately 4.5 kilometers.
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The site is predominantly underlain by Table Mountain Group sandstone. The base rock comprises Skurweberg Formation, which is described as a light-grey quartzitic sandstone. The North Langeberg Sandstone Fynbos is not currently listed as a threatened vegetation type (DEA 2011). About 92% of it remains, while 13% is formally conserved in the Boosmansbos Wilderness Area and an additional 45% in mountain catchment areas. This rating is reaffirmed in the 2018 National Biodiversity Assessment. The site does not form part of the Mossel Bay CBA network. It is located between two aquatic ecological support areas (drainage lines), with a large critical biodiversity area (CBA) located further away to the west. Loss of designated CBA's is therefore not recommended.

The project will not impact significantly on the biodiversity network as currently presented. Given the disturbed state of the site, the impact on vegetation type per se is of a low to moderate concern. The impact will be slightly more for the encountered Species of Conservation Concern, which are mostly still well represented in the larger Mossel Bay area. As a mitigation measure (if development is allowed to proceed), consideration should be given to the search and rescue of *Euphorbia procumbens* of which there are between 50 and 100 plants on site.

The Site Investigation confirmed the presence of a natural Channelled Valley-Bottom (CVB) Wetland Area associated with a Non-Perennial Drainage Line situated approximately 420 metres northeast of the proposed development footprint and a Depression Wetland associated with the Mossel Bay Aerodrome situated approximately 800 metres southwest of the concerned development footprint. No aquatic resources were discovered on the concerned portion of Erf 21277 directly.

These findings correspond to the National Freshwater Ecosystem Priority Areas (NFEPA) and the National Wetland Map 5 water resource mapping databases for the surrounding area. The Channelled Valley-Bottom (CVB) Wetland associated with the Non-Perennial Drainage Line is situated in the K10A Quaternary Catchment and responsible for the draining of stormwater originating from the smallholdings in Aalwyndal with culvert structures noted along Suikenkan Street and Klipheuwel Weg, draining stormwater underneath Klipheuwel Weg in an eastern direction towards the lower-lying areas of Mossel Bay. Additionally, an artificial farm dam was also discovered immediately east of Klipheuwel Weg in the headwaters of this Channelled Valley-Bottom Wetland system, with the origin and construction date of this artificial farm dam being unknown.

The current landscape typology of the Aalwyndal area is a combination of rural-, residential- and commercial/light industrial activities associated with the Mossel Bay Airfield and a few other sites in the vicinity of the Airfield. The direct surrounding area to the site and on the Aalwyndal area comprises of open farmlands and disturbed landscape predominate, interspersed with smaller patches of relatively undisturbed natural vegetation. Currently Erf 21277 is used as a horse paddock and for grazing with direct surrounding erven functioning in agricultural and residential pursuits. The agricultural land is essentially not affected by this land use application as Portion A is already zoned Single Residential Zone I with the intent to rezone Portion A of Erf 21277 as Industrial Zone I for light industrial purposes.

On a side note, the effective and equitable functioning of land markets in the surrounding areas are not negatively affected either by the selection and land use application. It is stated that all current and future costs to all parties for the provision of infrastructure and social services in land developments must be considered. This land use application will not increase costs to the Municipality but rather increase revenue.

The property falls within the urban edge, within which development proposals will be considered. A further study, The Aalwyndal Precinct Plan, was completed in 2018 to guide future development in Aalwyndal. This area has been earmarked for intensified urban development that will include plans to enlarge the present Mossel Bay Airfield. Erf 21277, Mossel Bay, is situated within the area where noise levels are considered unsuitable for residential purposes and has been identified as suitable for commercial development, including services related to the Airfield such as storage.

Provide a description of any other property and site alternatives investigated.
No alternative site or property alternative exists.
Provide a motivation for the preferred property and site alternative including the outcome of the site selectin matrix.
Based on the Provincial Spatial Development Framework and Municipal Spatial Development Framework as well as other environmental legislation the preferred alternative positively fall within the majority of the parameters set forth in each of these frameworks including adding to community and provincial growth. The preferred alternative will ensure the upgrade of infrastructure in the area and adds to social services towards the community with regards to their needs. Additionally, the preferred alternative will not increase costs to the local Municipality as water and electricity connections had already been established but rather increase their annual revenue, both in terms construction and operational duration and capacity. Furthermore, said alternative will not contribute towards urban sprawl and will contribute to existing resources and infrastructure that is readily available in the area. This proposed development does not have a negative impact regarding financial, social, economic, or environmental considerations for the relevant authorities. The proposed storage units are a quiet land use with varying intensity. It responds to the spatial planning for Aalwyndal all residents have been part of. The preferred alternative falls within the Aalwyndal urban edge. The Aalwyndal Precinct Plan was completed in 2018 to guide future development in Aalwyndal. This area has been earmarked for intensified urban development that will include plans to enlarge the present Mossel Bay Airfield. Erf 21277, Mossel Bay, is situated within the 55RDI noise contour where noise levels are considered unsuitable for residential purposes and has been identified as suitable for commercial development, including services related to the Airfield such as storage. Additionally, the proposed storage development will have a positive socio-economic impact in providing employment opportunities during both the constructional and operational phase, both in terms of running the facility and in terms of the business that will be able to operate from the facility. The access and use of storage is also a common requirement in modern society, and this has been identified by the proponent as a need in the area. These are clear economic and social benefit that will achieve economic growth and increase public and private investments for job creation in the area. The extent of the property (7.7 ha) will also not be developed, but rather a portion thereof (1.44 ha) which limits environmental impacts considerably with regards to indigenous vegetation (if considerable impact where to be expected).
Provide a full description of the process followed to reach the preferred alternative within the site.
The proposal conforms to all guidelines and frameworks set forth by the Mossel Bay Municipality. The preferred alternative was selected from an economic viability perspective whilst taking these policies and guidelines into consideration.
Provide a detailed motivation if no property and site alternatives were considered.
No property or site alternative has been considered since the applicant has acquired the site based on relevant market research, as the site is strategically located for the proposed development proposal.
List the positive and negative impacts that the property and site alternatives will have on the environment.
<u>Positive Impacts</u>

	- Given the disturbed state of the site, the impact on vegetation type per se is of a low to moderate concern. <u>Negative Impacts</u> - The impact will be slightly more for the encountered Species of Conservation Concern, but with implementing the search and rescue mitigation, Conservation Concern Species such as <i>Euphorbia procumbens</i> will be placed in a more desirable environment. - Potential visual impacts (visual intrusion) associated with both the construction and operational phases;
1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
	Provide a description of the preferred activity alternative.
	The preferred activity alternative involves the creation of a storage facility.
	Provide a description of any other activity alternatives investigated.
	The only activity alternatives refer to the previous development alternative for a combination of storage and solar power generation activities on the site. This alternative is outlined as part of the layout alternatives.
	Provide a motivation for the preferred activity alternative.
	The preferred activity proposal will not require any additional financial agreements with an electricity supplier such as Eskom. The preferred activity includes a small solar farm for the generation of electricity on site, however there is not sufficient bulk electrical infrastructure available in the vicinity of the site in order to transmit the electricity generated. Furthermore, this would require an agreement with Eskom to purchase the electricity generated which does not seem likely. As a result, the preferred alternative is an economically viable alternative to the proponent and is in line with the market requirements and the Mossel Bay Municipal frameworks for development in this area.
	Provide a detailed motivation if no activity alternatives exist.
	The current alternatives are deemed appropriate and conforms to all guidelines and frameworks provided by the Mossel Bay Municipality.
	List the positive and negative impacts that the activity alternatives will have on the environment.
	Please refer to layout alternatives below.
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.
	Preferred Layout Alternative The total extent of Erf 21277, Aalwyndal, Mossel Bay, is approximately 7.7 hectares in extent and is situated along Nagtegaal Street. The property is currently zoned Single Residential Zone 1 and will be subdivided as part of the application. The development is proposed on Portion A which comprises 1.44ha along Nagtegaal Street and will be rezoned from Single Residential Zone 1 to Industrial Zone 1 (light industry) in line with the Spatial Development Framework for the Aalwyndal precinct to accommodate the proposed self-storage facility. The development herewith applied for on Portion A includes the following components and has been proposed to be developed in two phases: Phase 1 of the development will entail the development of 228 small self-storage units allocated in four separate blocks with varying building dimensions and unit sizes. Block 1: Comprising of 42 storage units (3m x 6m).

Block 2: Comprising of 12 storage units (3m x 9m) as well as 1 storage units (5.6m x 9m).
 Block 3: Comprising of 35 storage units (3m x 4m) as well as 35 storage units (3m x 7m), thus 70 units in total.
 Block 4: Comprising of 33 storage units of (3m x 7.8m); 35 storage units of (3m x 3m); as well as 35 storage units of (3m x 4m).

The total development footprint of phase 1 is proposed to be approximately 4281m². Additionally, an office/toilet structure will be developed comprising of a 38m² footprint.

Phase 2 of the development will entail the development of another 228 small self-storage units allocated in four separate blocks with building dimensions and unit sizes.

Block 5: Comprising of 42 storage units (3m x 6m).
 Block 6: Comprising of 12 storage units (3m x 9m) as well as 1 storage units (5.6m x 9m).
 Block 7: Comprising of 35 storage units (3m x 4m) as well as 35 storage units (3m x 7m), thus 70 units in total.
 Block 8: Comprising of 33 storage units of (3m x 7.8m); 35 storage units of (3m x 3m); as well as 35 storage units of (3m x 4m).

The total development footprint of phase 2 is proposed to be approximately 4281m². Additionally, an office/toilet structure will be developed comprising of a 38m² footprint.

In total, the proposed development will consist of 456 small self-storage units and a development area of 8562 m².

It is proposed that the administration office and toilet facility will be connected to a conservancy tank and the existing water line along Nagtegaal Street will supply the required potable water.

Furthermore, as per the Preferred Site Development Plan (AD21277/2023 dated 21 January 2024) 75 parking bays are required and 76 shaded parking bays have been provided for. One parking bay will be distributed and constructed per 100 m² of self-storage units.

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

Layout Alternative 1:

The proposed development involves the subdivision of Erf 21277 (7.775 ha), as well as the rezoning of an approximately 1.44 ha portion (Portion A) of the subdivided property from Single Residential Zone 1 to Industrial Zone 1 (light industry) as a proposed self-storage facility. The development on the rezoned portion includes the following components:

176 small Self-storage Units in two blocks of 1796.45 m² each.
 40 larger units in one block of 3540 m² .
 Administration Office and toilet facility (the latter connected to a septic tank).
 The existing water line along Nagtegaal Street will supply water.
 Parking Bays – 7 bays.

There will be two blocks of standard storage units and one block of larger units. The buildings will have pitched roofs with the smaller units being 4.213 m high at their apices and the larger units 9500 m.

Layout Alternative 2:

The previous proponent proposed to develop self-storage units and 8 larger rentable areas as well as a small solar plant on a portion of Erf 21277, Aalwyndal. This will include the subdivision of Erf 21277 in terms of Section 15(2)(d) of the Mossel Bay Municipality By-Law on Municipal Land Use Planning (2019), as well as the Rezoning of a portion of the subdivided property from Single Residential Zone 1 to Industrial Zone 1 (light industry).

A total of 104 units are proposed which is to be located on the eastern section of the site. Three types of units are proposed, 84 smaller storage units are proposed as 19.7m² in extent, 4 medium rentable workshops are proposed as 78.7m² in extent and the large rentable workshops are proposed as 118m² in extent. All buildings will be single storage buildings. The development will also require a small administrative office building and a toilet facility for office staff and visitors to the site with the building totalling 80.53m² in extent.

A total of 42 parking bays will be required in line with the lettable areas provided to service the development. Parking bays have been positioned along the eastern and northern boundaries of the site to set the buildings back from the road interface and minimizing visual intrusion.

The need for water, electricity and sewerage disposal is very limited due to the nature of the development proposal. A conservancy tank is proposed for the toilet facility of the administrative office building, to be serviced by a private contractor as the need occurs. A water connection is available for the basins and the toilet. Electricity connections are also readily available although it is envisioned that the site will utilize the solar power once operational.

The proposed solar plant will be a 350kW micro-Independent Power Producer (IPP), and the conceptual design is as follows:

SL.	Topics	Quantity
1.	Module Dimensions: 2078 mm * 991 mm * 2655 mm Each Module Capacity: 410 Wp 65 Modules in X-direction, 2 Modules in Y-direction, 7 Rows Tilt Angle 28°, Minimum Elevation Angle 31.88°, Azimuth Angle 8.99°	Your Input Values
2.	Length in X-direction for a single row	64.42
3.	Length in Y-direction for a single row	4.16
4.	Module Capacity in a single Row	53.3
5.	Total Module Capacity	373.1
6.	Active Height of a Row	4.61
7.	Active Length of a Row	3.67
8.	Length of the Free Space for a row	-7.31
9.	Active Area of a single Row	236.37
10.	Free Area for a single Row	-471.18
11.	Total Area of a single Row	-234.81

12.	Active Area% : Free Area%	-101 : 201
13.	Total Area in Square Meter [n rows and (n-1) free spaces]	-1172.5
14.	Area Per kWp	-3.1
15.	Total Area in Acre [n rows and (n-1) free spaces]	-0.29
16.	Area Per MWp	-0.8



Figure 20: Conceptual Design Depiction.

Provide a motivation for the preferred design or layout alternative.

The preferred layout proposal will not require any additional financial agreements with an electricity supplier such as Eskom. Layout Alternative 2 proposed to include a small solar farm for the generation of electricity on-site, however, there is not sufficient bulk electrical infrastructure available in the vicinity of the site in order to transmit the electricity generated. Furthermore, this would require an agreement with Eskom to purchase the electricity generated which does not seem likely. As a result, the preferred alternative is an economically viable alternative to the proponent and is in line with the market requirements and the Mossel Bay Municipal frameworks for development in this area.

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

Not Applicable

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

Positive Impacts

- Given the disturbed state of the site, the impact on vegetation type per se is of low to moderate concern.
- Construction phase job opportunities for the surrounding low-income areas;
- Operational long-term job opportunities;
- Provision of a much-needed commercial (storage) component;
- Additional investment and rates and taxes to the area and municipality.

Negative Impacts

- The impact will be slightly more for the encountered Species of Conservation Concern, but with implementing the search and rescue mitigation, Conservation Concern Species such as *Euphorbia procumbens* will be placed in a more desirable environment.

	- Potential visual impacts (visual intrusion) associated with both the construction and operational phases; - Potential noise impacts associated with the use of machinery during the construction phase; - Potential traffic impacts during the construction phase.
1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred technology alternative:	
Not Applicable	
Provide a description of any other technology alternatives investigated.	
Provide a motivation for the preferred technology alternative.	
Provide a detailed motivation if no alternatives exist.	
List the positive and negative impacts that the technology alternatives will have on the environment.	
1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred operational alternative.	
Not Applicable	
Provide a description of any other operational alternatives investigated.	
Provide a motivation for the preferred operational alternative.	
Provide a detailed motivation if no alternatives exist.	
List the positive and negative impacts that the operational alternatives will have on the environment.	
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.	
Currently Erf 21277 is used as a horse paddock and for grazing with direct surrounding erven functioning in agricultural and residential pursuits. Given the current use of the portion for the proposed development, the site is severely degraded and disturbed which significantly lower the impact on indigenous fynbos flora that might be affected. Additionally, the site does not falls within a CBA or other protected areas, also limiting environmental damage if the development should continue. The proposed storage development will have a positive socio-economic impact in providing employment opportunities during both the constructional and operational phase, both in terms of running the facility and in terms of the business that will be able to operate from the facility. Additionally, this will also bring about economic growth within the area as the access and use of storage is also a common requirement in modern society and this has been identified by the proponent as a need in the area. If the project were not implemented, then the site would stay as it currently is so the loss of socio-economic benefits is more significant and suggests that the No-Go option is less desirable.	
1.7.	Provide and explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.
Not Applicable	
1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.

It is recommended that both the Preferred Site Development Alternative is authorized as this is the more viable alternative to the opinion of the EAP and will result in significant and long term positive socio-economic impacts with limited environmental impacts.

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).

Not applicable. The current development footprint of 1.44ha has no, "no-go" area(s) of concern. No encroachment of natural areas outside the development should be allowed.

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.

The methodology for the description and assessment of environmental impacts were drawn from the National Environmental Management Act, 1998 (Act No.107 of 1998).

The level of detail was somewhat fine-tuned by assigning specific values to each impact. In order to establish a coherent framework within which all impacts could be objectively assessed it is necessary to establish a rating system, which is consistent throughout all criteria. For such purposes each aspect was assigned a value, ranging from 1-5, depending on its definition.

Potential Impact

This is an appraisal of the type of effect the proposed activity would have on the affected environmental component. Its description should include what is being affected and how it is being affected.

Extent

The physical and spatial scale of the impact is classified as:

- Local: The impacted area extends only as far as the activity, e.g. a footprint.
- Site: The impact could affect the whole, or a measurable portion of the site.
- Regional: The impact could affect the area including the neighbouring erven, the transport routes and the adjoining towns.
- Duration: The lifetime of the impact, which is measured in relation to the lifetime of the proposed base.
 - Short term: The impact will either disappear with mitigation or will be mitigated through a natural process in a period shorter than any of the phases.
 - Medium term: The impact will last up to the end of the phases, where after it will be entirely negated.
 - Long term: The impact will continue or last for the entire operational lifetime of the development, but will be mitigated by direct human action or by natural processes thereafter.
 - Permanent: This is the only class of impact, which will be non-transitory. Mitigation either by man or natural process will not occur in such a way or in such a time span that the impact can be considered transient.

Intensity: The intensity of the impact is considered here by examining whether the impact is destructive or benign, whether it destroys the impacted environment, alters its functioning, or slightly alters the environment itself. These are rated as:

- Low: The impact alters the affected environment in such a way that the natural processes or functions are not affected.
- Medium: The affected environment is altered, but functions and processes continue, albeit in a modified way.
- High: Function or process of the affected environment is disturbed to the extent where it temporarily or permanently ceases.

This will be a relative evaluation within the context of all the activities and the other impacts within the framework of the project.

Probability: This describes the likelihood of the impacts actually occurring. The impact may occur for any length of time during the life cycle of the activity, and not at any given time. The classes are rated as follows:

- Improbable: The possibility of the impact occurring is none, due either to the circumstances, design or experience.
- Possible: The possibility of the impact occurring is very low, due either to the circumstances, design or experience.
- Likely: There is a possibility that the impact will occur to the extent that provisions must therefore be made.
- Highly Likely: It is most likely that the impacts will occur at some stage of the Development. Plans must be drawn up before carrying out the activity.
- Definite: The impact will take place regardless of any prevention plans, and only mitigation actions or contingency plans to contain the effect can be relied on.

Determination of Significance – Without Mitigation

Significance is determined through a synthesis of impact characteristics, and is an indication of the importance of the impact in terms of both physical extent and time scale. The significance of the impact "without mitigation" is the prime determinant of the nature and degree of mitigation required. Where the impact is positive, significance is noted as "positive". Significance is rated on the following scale:

- No significance: The impact is not substantial and does not require any mitigation action.
- Low: The impact is of little importance, but may require limited mitigation.
- Medium: The impact is of importance and is therefore considered to have a negative impact. Mitigation is required to reduce the negative impacts to acceptable levels.
- High: The impact is of great importance. Failure to mitigate, with the objective of reducing the impact to acceptable levels, could render the entire development option or entire project proposal unacceptable. Mitigation is therefore essential.

Determination of Significance – With Mitigation

Significance is determined through a synthesis of impact characteristics. It is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. In this case the prediction refers to the foreseeable significance of the impact after the successful implementation of the suggested mitigation measures. Significance with mitigation is rated on the following scale:

- No significance: The impact will be mitigated to the point where it is regarded to be insubstantial.
- Low: The impact will be mitigated to the point where it is of limited importance.
- Low to medium: The impact is of importance, however, through the implementation of the correct mitigation measures such potential impacts can be reduced to acceptable levels.

- Medium: Notwithstanding the successful implementation of the mitigation measures, to reduce the negative impacts to acceptable levels, the negative impact will remain of significance. However, taken within the overall context of the project, the persistent impact does not constitute a fatal flaw.
- Medium to high: The impact is of great importance. Through implementing the correct mitigation measures the negative impacts will be reduced to acceptable levels.
- High: The impact is of great importance. Mitigation of the impact is not possible on a cost-effective basis. The impact continues to be of great importance, and, taken within the overall context of the project, is considered to be a fatal flaw in the project proposal. This could render the entire development option or entire project proposal unacceptable.

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.

Alternative: Preferred development	Botanical Impacts
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	
Nature of impact:	Loss and damage of Three recorded Species of Conservation Concern namely <i>Hermannia lavandulifolia</i> (Vul), <i>Polygala pubiflora</i> (Vul) and <i>Ruellia pilosa</i> (Vul) and <i>Euphorbia procumbens</i> which has relatively low representing number.
Extent and duration of impact:	Long term, local and regional impact
Consequence of impact or risk:	Reduced numbers in area specific (Garden Route) <i>Euphorbia procumbens</i> numbers.
Probability of occurrence:	Likely
Degree to which the impact may cause irreplaceable loss of resources:	Medium
Degree to which the impact can be reversed:	Low
Indirect impacts:	Loss of habitat
Cumulative impact prior to mitigation:	Medium Negative
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	It is recommended that should development proceed these plants be searched and rescued and replanted in a suitable area nearby where it can be protected into perpetuity. Refer to the proposed Search and Rescue Procedure included in the Section C and H for this report and the EMP respectively.
Residual impacts:	None
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
OPERATIONAL PHASE	
Potential impact and risk:	
Nature of impact:	Mitigation measures should take place prior to the operational and construction phases, therefore there will be no significant impact.
Extent and duration of impact:	Not applicable
Consequence of impact or risk:	Not applicable
Probability of occurrence:	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Not applicable
Degree to which the impact can be reversed:	Not applicable
Indirect impacts:	Not applicable
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable

Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Not applicable
Degree to which the impact can be mitigated:	Not applicable
Proposed mitigation:	Not applicable
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	
Nature of impact:	Not applicable
Extent and duration of impact:	Not applicable
Consequence of impact or risk:	Not applicable
Probability of occurrence:	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Not applicable
Degree to which the impact can be reversed:	Not applicable
Indirect impacts:	Not applicable
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Not applicable
Degree to which the impact can be mitigated:	Not applicable
Proposed mitigation:	Not applicable
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable

Alternative: Preferred development	Aquatic Impacts
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	
Nature of impact:	The proposed development site fall within 500m of a designated wetland - natural Channelled Valley-Bottom (CVB) Wetland Area associated with a Non-Perennial Drainage Line situated approximately 420 metres northeast of the proposed development footprint. Construction and operational phases may result in leakage and contamination of surface and groundwater.
Extent and duration of impact:	Medium term and site related
Consequence of impact or risk:	Destruction of aquatic ecosystems and pollution of groundwater
Probability of occurrence:	Improbable
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	High
Indirect impacts:	Potential conveyance of contaminated water or excess sediment loads from the construction activities.
Cumulative impact prior to mitigation:	Medium - Negative
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	<u>Development Management</u> Contractor laydown areas are to be established outside of the 500-metre Regulatory Zone of the

	wetland system and only for a short duration in consultation with the competent authority. • All development footprint areas to remain as small as feasibly possible and vegetation clearing to be limited to what is absolutely essential to complete the required works. • Construction Activities should preferably be undertaken during the drier summer months, to minimise the impact on the Hydrological & Geomorphological Functioning of the wetland system. • All construction debris and litter must be removed. It may be temporarily stockpiled outside the extent of the 500-metre regulatory buffer zone but must be removed and disposed of at a licensed Processing Facility at regular intervals as specified in the legally binding Environmental Management Plan (EMP) approved by the Competent Authority. • Care must be taken, and all construction personnel must receive training on the risks of chemical contamination of the wetland area. • Chemical spills within and surrounding the 500-metre wetland regulatory buffer zone should be immediately remediated utilizing an Emergency Spill Response Procedure to form part of the legally binding Environmental Management Plan (EMP) approved by the Competent Authority. <u>Vehicular Access</u> • All construction vehicles must be regularly inspected for leaks. Refuelling must take place on a sealed surface area to prevent the ingress of hydrocarbons into the topsoil. • In the event of a vehicle breakdown, maintenance of vehicles must take place with care and the recollection of spillage should be practised near the surface area to prevent the ingress of hydrocarbons into the topsoil. • All spills should they occur, should be immediately cleaned up and treated accordingly. <u>Soil</u> • Sheet runoff from excavations and stockpiles should be slowed down by the strategic placement of silt traps in accordance with the legally binding Environmental Management Plan (EMP). • As far as feasibly possible, all construction activities should occur during the dry summer months (December - February).
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	All stockpiles are to be protected with a suitable geotextile to prevent sedimentation.
Residual impacts:	None
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low-negative
OPERATIONAL PHASE	
Potential impact and risk:	
Nature of impact:	Mitigation measures should take place prior to the operational and construction phases, therefore there will be no significant impact.
Extent and duration of impact:	Not applicable
Consequence of impact or risk:	Not applicable
Probability of occurrence:	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Not applicable
Degree to which the impact can be reversed:	Not applicable
Indirect impacts:	Not applicable
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Not applicable
Degree to which the impact can be mitigated:	Not applicable
Proposed mitigation:	Not applicable
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	
Nature of impact:	Not applicable
Extent and duration of impact:	Not applicable
Consequence of impact or risk:	Not applicable
Probability of occurrence:	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Not applicable
Degree to which the impact can be reversed:	Not applicable
Indirect impacts:	Not applicable
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Not applicable
Degree to which the impact can be mitigated:	Not applicable
Proposed mitigation:	Not applicable
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable

Alternative: Preferred development	Agricultural Impacts
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	
Nature of impact:	Loss of approximately 1.44 hectares of available land for farming activities.
Extent and duration of impact:	Long term, local and regional impact
Consequence of impact or risk:	Reduced agricultural output.
Probability of occurrence:	Likely

Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Low
Indirect impacts:	Alteration of Local Land Use Patterns
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	The soil capability is rated as 4, indicating low to moderate capability, while the terrain capability is rated between 6 and 7, representing moderate to high capability. Land capability values range from 7 (low to moderate) to 8 (moderate), placing the site on the boundary between arable and non-arable land. The desktop assessment aligns with the screening tool's classification of medium agricultural sensitivity. Given the small development footprint and its minimal impact on current agricultural activities, the specialist recommends that the development proceed and NO MITIGATION MEASURES are proposed.
Residual impacts:	None
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
OPERATIONAL PHASE	
Potential impact and risk:	
Nature of impact:	No significant impact will occur as the property has no significant agricultural value.
Extent and duration of impact:	Not applicable
Consequence of impact or risk:	Not applicable
Probability of occurrence:	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Not applicable
Degree to which the impact can be reversed:	Not applicable
Indirect impacts:	Not applicable
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Not applicable
Degree to which the impact can be mitigated:	Not applicable
Proposed mitigation:	Not applicable
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	
Nature of impact:	Not applicable
Extent and duration of impact:	Not applicable
Consequence of impact or risk:	Not applicable
Probability of occurrence:	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Not applicable
Degree to which the impact can be reversed:	Not applicable
Indirect impacts:	Not applicable
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Not applicable

Degree to which the impact can be mitigated:	Not applicable
Proposed mitigation:	Not applicable
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable

Alternative: Preferred development	Animal Impacts
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	
Nature of impact:	Habitat loss for the species present in the area, as no natural vegetation will remain at the study site.
Extent and duration of impact:	Long term, local impact
Consequence of impact or risk:	Reduced numbers of possible identified SCCs.
Probability of occurrence:	Likely
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Low
Indirect impacts:	Loss of habitat
Cumulative impact prior to mitigation:	Low Negative
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	Medium
Degree to which the impact can be mitigated:	High
Proposed mitigation:	It is recommended that the remainder of the property (particularly to the west) be left as undisturbed as possible, to act as a refugium ecological corridor in an increasingly-fragmented landscape.
Residual impacts:	None
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
OPERATIONAL PHASE	
Potential impact and risk:	
Nature of impact:	During the operational phase, impacts on animal species consist of the use of rodenticides, and a reduction of animal movement through the development footprint.
Extent and duration of impact:	Long-term
Consequence of impact or risk:	Low
Probability of occurrence:	Low
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Low
Indirect impacts:	Loss of animal movement
Cumulative impact prior to mitigation:	Low Negative
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	It is recommended that some locally indigenous plants are planted along the edge of the property, to allow the movement of some small animals (insects, birds, mammals and reptiles)
Residual impacts:	Low
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
DECOMMISSIONING AND CLOSURE PHASE	

Potential impact and risk:	
Nature of impact:	Not applicable
Extent and duration of impact:	Not applicable
Consequence of impact or risk:	Not applicable
Probability of occurrence:	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Not applicable
Degree to which the impact can be reversed:	Not applicable
Indirect impacts:	Not applicable
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Not applicable
Degree to which the impact can be mitigated:	Not applicable
Proposed mitigation:	Not applicable
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable

Alternative: Preferred development	Cumulative Heritage Impacts																										
PLANNING, DESIGN AND DEVELOPMENT PHASE																											
Potential impact and risk:																											
<u>Assessment of palaeontological impacts</u>																											
<table border="1"> <thead> <tr> <th colspan="2">Potential impacts on palaeontological resources</th></tr> </thead> <tbody> <tr> <td>Nature and status of impact:</td><td>Direct, negative</td></tr> <tr> <td>Extent and duration of impact:</td><td>Site specific, permanent</td></tr> <tr> <td>Intensity</td><td>Very low</td></tr> <tr> <td>Probability of occurrence:</td><td>Very low</td></tr> <tr> <td>Degree to which the impact can be reversed:</td><td>Low</td></tr> <tr> <td>Degree to which the impact may cause irreplaceable loss of resources:</td><td>Low</td></tr> <tr> <td>Cumulative impact prior to mitigation:</td><td>Low</td></tr> <tr> <td>Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)</td><td>Medium</td></tr> <tr> <td>Degree to which the impact can be mitigated:</td><td>High (but not required at present)</td></tr> <tr> <td>Proposed mitigation:</td><td>Reporting of chance finds</td></tr> <tr> <td>Cumulative impact post mitigation:</td><td>Low</td></tr> <tr> <td>Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)</td><td>Low</td></tr> </tbody> </table>		Potential impacts on palaeontological resources		Nature and status of impact:	Direct, negative	Extent and duration of impact:	Site specific, permanent	Intensity	Very low	Probability of occurrence:	Very low	Degree to which the impact can be reversed:	Low	Degree to which the impact may cause irreplaceable loss of resources:	Low	Cumulative impact prior to mitigation:	Low	Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Medium	Degree to which the impact can be mitigated:	High (but not required at present)	Proposed mitigation:	Reporting of chance finds	Cumulative impact post mitigation:	Low	Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low
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Intensity	Low																										
Probability of occurrence:	Definite																										
Degree to which the impact can be reversed:	High																										

Degree to which the impact may cause irreplaceable loss of resources:	Low
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Minimise construction duration. Keep site neat and tidy. Establish planted areas with screening trees (if feasible during construction).
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Assessment of visual intrusion impacts

Key visual impacts	Visibility of construction vehicles, temporary structures, scaffolding, site storage of materials during construction.	
Extent	No mitigation	Local
	With mitigation	Local
Duration	No mitigation	Short-term
	With mitigation	Short-term
Intensity	No mitigation	Medium
	With mitigation	Medium to low
Probability	No mitigation	Probable
	With mitigation	Probable to low
Significance	No mitigation	Medium to low
	With mitigation	Low

Proposed Mitigation:

- Screening site with appropriate site hoarding.
- Limit disturbance to the least possible area needed for construction.
- Rehabilitate and revegetate disturbed areas on site immediately following construction.

OPERATIONAL PHASE

Potential impact and risk:

Assessment of impacts to the cultural landscape

Potential impacts on the cultural landscape	
Nature and status of impact:	Direct, negative
Extent and duration of impact:	Local, long term
Intensity	Low
Probability of occurrence:	Definite
Degree to which the impact can be reversed:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be mitigated:	High
Proposed mitigation:	Prepare a landscape plan that includes peripheral planting to screen the facility from
	the surrounding area. Use building materials and finishes that are recessive and complimentary to local landscape.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Assessment of visual intrusion impacts

Key visual impacts	Change in the visual character of the area from a peaceful, partly developed rural setting to a more lively rural setting.	
Extent	No mitigation	Local
	With mitigation	Local
Duration	No mitigation	Long-term
	With mitigation	Long-term
Intensity	No mitigation	Medium
	With mitigation	Medium to low
Probability	No mitigation	Probable
	With mitigation	Probable
Significance	No mitigation	Medium
	With mitigation	Medium to low

Proposed Mitigation:

- Design buildings and landscape to complement the existing sense of place.
- Use of materials and finishes that will allow new developments to blend in with visual surroundings and reduce visual intrusion.
- Appropriate screening.

DECOMMISSIONING AND CLOSURE PHASE

Potential impact and risk:	
Nature of impact:	Not applicable
Extent and duration of impact:	Not applicable
Consequence of impact or risk:	Not applicable
Probability of occurrence:	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Not applicable
Degree to which the impact can be reversed:	Not applicable
Indirect impacts:	Not applicable

Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Not applicable
Degree to which the impact can be mitigated:	Not applicable
Proposed mitigation:	Not applicable
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable

Alternative: Preferred development	Noise Impacts
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk: Potential noise impacts are associated with the use of construction machinery during the construction phase.	
Nature of impact:	Road noise generated from construction vehicles and activities
Extent and duration of impact:	Short term along the development footprint
Consequence of impact or risk:	Noise disturbance
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Highly unlikely
Degree to which the impact can be reversed:	Medium
Indirect impacts:	Noise generation within the area
Cumulative impact prior to mitigation:	Noise generation within unallocated times
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	Confine construction to working hours
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Low - Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low - Medium

OPERATIONAL PHASE	
Potential impact and risk:	
Nature of impact:	Road noise generated from owners accessing storage units a long with weekly sewage removal trucks.
Extent and duration of impact:	Long term along the development footprint
Consequence of impact or risk:	Noise disturbance
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Highly unlikely
Degree to which the impact can be reversed:	Medium
Indirect impacts:	Not considered
Cumulative impact prior to mitigation:	Not considered
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	No mitigation is required.
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Low - Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low - Medium

DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	Not applicable
Nature of impact:	Not applicable
Extent and duration of impact:	Not applicable
Consequence of impact or risk:	Not applicable
Probability of occurrence:	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Not applicable
Degree to which the impact can be reversed:	Not applicable
Indirect impacts:	Not applicable
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Not applicable
Degree to which the impact can be mitigated:	Not applicable
Proposed mitigation:	Not applicable
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable

Alternative: Preferred development	Dust
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	
Nature of impact:	Site dust from earth moving activities and the movement of trucks
Extent and duration of impacts:	Short term and surrounding area
Consequence of impact or risk:	Dust pollution to the surrounding residential area
Probability of occurrence:	Possible
Degree to which the impact may cause irreplaceable loss of resources:	Unlikely
Degree to which the impact can be reversed:	Medium
Indirect impacts:	Site dust from earth moving activities and the movement of trucks
Cumulative impact prior to mitigation:	Medium Negative
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low – Medium
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	- Roadways will be planned and demarcated for the site so that trucks and light vehicles only travel on these roads. Road surfaces will be maintained, and adequate drainage provided from the road. The road planning will also be phased in as the site develops and as construction in new areas begins. - A minimum of one watering truck will be available for use on the site at all times. This will allow for watering to be done while the other truck is being filled and prepared for use. Watering trucks will be prepared and made ready for watering of gravel roads in the afternoons so that they are ready first thing in the morning to be used. All road surfaces on the

	site will be watered down at least once per day. - Vegetation removal for the site will be planned to minimise the length of time that land is open and exposed as a dust source before construction begins. - The large open areas that are exposed, at the moment, will be cordoned off to prevent vehicles and other activities from disturbing the area. If no vegetation is growing, then a once off treatment of Eco Dust 200 D can be applied to stabilise the area. - A checklist will be kept of the watering activities as proof that they are being done and to quantify the amount of water used per week for this purpose. - For small stockpiles of temporary material, the material will be covered with hessian or other cloth. - Stockpile placement will be planned to be as close to where they will be used as possible. - The planning will also try to minimise the length of time that the material will be kept on site before it is used in the construction process.
Residual impacts:	None
Cumulative impact post mitigation:	Low - Medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low - Medium
OPERATIONAL PHASE	
Potential impact and risk:	
Nature of impact:	No dust impacts will result from the operational phase
Extent and duration of impact:	Long-term and immediate area
Consequence of impact or risk:	Dust pollution
Probability of occurrence:	Highly Unlikely
Degree to which the impact may cause irreplaceable loss of resources:	Highly Unlikely
Degree to which the impact can be reversed:	Low
Indirect impacts:	No dust impacts will result from the operational phase
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	No mitigation would be required as the formalisation of the site during the operational phase will not result in any dust pollution.
Residual impacts:	None

Cumulative impact post mitigation:	Low Negative
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Negative
DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	
Nature of impact:	Not applicable
Extent and duration of impact:	Not applicable
Consequence of impact or risk:	Not applicable
Probability of occurrence:	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Not applicable
Degree to which the impact can be reversed:	Not applicable
Indirect impacts:	Not applicable
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Not applicable
Degree to which the impact can be mitigated:	Not applicable
Proposed mitigation:	Not applicable
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable

Alternative: Preferred development	Civil Aviation Impacts
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Interference with civil aviation operations.
Nature of impact:	No Impact
Extent and duration of impact:	No short-term (1 to 5 years) or long-term (10 years+) impacts are foreseen by the aviation assessment
Consequence of impact or risk:	None, due to full compliance with aviation safety regulations.
Probability of occurrence:	Highly Unlikely
Degree to which the impact may cause irreplaceable loss of resources:	None
Degree to which the impact can be reversed:	Not applicable
Indirect impacts:	None
Cumulative impact prior to mitigation:	None
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	None
Degree to which the impact can be avoided:	Not applicable, as there are no impacts.
Degree to which the impact can be managed:	Not applicable, as there are no impacts.
Degree to which the impact can be mitigated:	Not applicable, as there are no impacts.
Proposed mitigation:	The proposed development location is located inside the Mossel Bay Airport's Obstacle Limited Surfaces but outside the Runway Strip and Take-Off & Climb and Approach Flight Paths. It is thus not necessary do any assessments regarding the Take-Off & Climb and Approach Flight Paths, but it is necessary initiate an assessment for Mossel Bay Airport's Obstacle Limited Surfaces. From Figure 10, It can be confirmed that the proposed development Powerline is located 502 metres from the start of the Runway Strip and 207 metres from the Outer Horizontal Surface. The total length of the proposed development is 1 60 metres.

	From Figure 11 it can be confirmed that the proposed development will not interfere with the Inner Horizontal Surface of the Mossel Bay Airport's Obstacle Limited Surfaces. The height of the proposed development is 14 meters, from the drawing it confirms that the proposed development is therefore 31 meters below the start of the Inner Horizontal Surface, which is 45 meters above the airport elevation. No further actions are required; the project complies with aviation safety regulations.
Residual impacts:	None
Cumulative impact post mitigation:	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	None
OPERATIONAL PHASE	
Potential impact and risk:	
Nature of impact:	No significant impact will occur only possible noise influence as included in the Mossel Bay SDF.
Extent and duration of impact:	Not applicable
Consequence of impact or risk:	Not applicable
Probability of occurrence:	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Not applicable
Degree to which the impact can be reversed:	Not applicable
Indirect impacts:	Not applicable
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Not applicable
Degree to which the impact can be mitigated:	Not applicable
Proposed mitigation:	Not applicable
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	
Nature of impact:	Not applicable
Extent and duration of impact:	Not applicable
Consequence of impact or risk:	Not applicable
Probability of occurrence:	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Not applicable
Degree to which the impact can be reversed:	Not applicable
Indirect impacts:	Not applicable
Cumulative impact prior to mitigation:	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable
Degree to which the impact can be avoided:	Not applicable
Degree to which the impact can be managed:	Not applicable
Degree to which the impact can be mitigated:	Not applicable
Proposed mitigation:	Not applicable
Residual impacts:	Not applicable
Cumulative impact post mitigation:	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Not applicable

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

1.	Provide a summary of the findings and impact management measures identified by all Specialist and an indication of how these findings and recommendations have influenced the proposed development.
	A Botanical Survey of the site was undertaken on 26 December 2020 by Mark Berry, to determine the status of vegetation found on site and its biodiversity value. Finding suggested that the current land use (grazing paddock for horses) on the proposed development site has led to the severely disturbed and degraded state of the site, leaving a minimum of viable fynbos plant species left in the area. The site occurs in a typical coastal fynbos environment. This is confirmed by the presence of fynbos species, such as <i>Aspalathus opaca</i>, <i>Metalasia acuta</i> and several <i>Herichrysum</i> species. Typical fynbos species, such as ericas and proteas, are however absent, probably due to the disturbed state of the site. These species were noted on nearby sites where relatively undisturbed fynbos was encountered. According to the South African Vegetation Map, the vegetation occurring on site and the surrounding area has been mapped as North Langeberg Sandstone Fynbos. Mossel Bay Shale Renosterveld and Hartenbos Dune Thicket (along the coast) occur further away to the northeast and south. While the vegetation found on site can be described as fynbos, it also shows an affinity with Mossel Bay Shale Renosterveld with the presence of renosterveld species such as <i>Elytropappus rhinocerotis</i>, <i>Oedera genistifolia</i> and <i>Barleria pungens</i>. Structurally, it can be described as a dwarf (<0.25 m) closed shrubland following Campbell's (1981) classification. The vegetation is a bit higher in certain areas where the shrub component is less disturbed. <i>Cynodon dactylon</i> (kweek) and <i>Helichrysum niveum</i> are dominant ground covers. The fynbos shows heavy disturbance by grazing and some alien infestation, notably <i>Acacia cyclops</i> (rooikrans) and <i>Cynodon dactylon</i>. Many Indigenous shrub species were found during the site visit, three Species of Conservation Concern were recorded on site, namely <i>Hermannia lavandulifolia</i> (Vul), <i>Polygala pubiflora</i> (Vul) and <i>Ruellia pilosa</i> (Vul). According to the online Red List 2 of South African Plants, they are all under threat from crop cultivation, coastal developments and alien infestation. <i>Polygala pubiflora</i> is a regional endemic, mostly found in renosterveld remnants. It is still frequently encountered (by the author and others) in the Mossel Bay area, but never in large numbers. It is difficult to spot when not in flower. <i>Hermannia lavandulifolia</i> is still well represented in the Mossel Bay area and is frequently encountered. A large number (50-100 plants) of <i>Euphorbia procumbens</i> were also recorded, mainly along the southern boundary of the site. Despite being widespread between Riversdale and the Eastern Cape and not listed as threatened, its numbers are very low, with only a few records along the Garden Route. It is recommended that (if development is allowed to proceed) these plants (<i>Hermannia lavandulifolia</i> (Vul), <i>Polygala pubiflora</i> (Vul) and <i>Ruellia pilosa</i> (Vul), and <i>Euphorbia procumbens</i> be searched and rescued and replanted in a suitable area nearby where it can be protected into perpetuity.



Figure 21: Location of the Species of Conservation Concern on the proposed development site

Therefore, on a concluding note, given the disturbed state of the site, the impact on vegetation type per se is of a low to moderate concern. The impact will be slightly more for the encountered Species of Conservation Concern, which are mostly still well represented in the larger Mossel Bay area. As a mitigation measure should development proceed, consideration should be given to the search and rescue of *Euphorbia procumbens* of which there are between 50 and 100 plants on site.

Mark Berry has subsequently compiled a detailed Search and Rescue Plan, dated February 2024, outlining the following requirements;

- Plant species considered suitable for search and rescue include certain succulents and geophytes. *Carpobrotus cf. deliciosus*, *Acrodon bellidiflorus*, *Adromischus caryophyllaceus*, *Crassula cultrate*, *Euphorbia procumbens*, *Hypoxis villosa*, *Ledebouria revoluta*, *Ornithogalum dubium*, *Ornithogalum juncifolium*, and *Satyrium membranaceum*.
- A large number (50-100 plants) of *Euphorbia procumbens* were recorded, mainly along the southern boundary of the site. An effort should be made to salvage as many as possible of these. *Carpobrotus cf. deliciosus* can be partly or wholly removed for replanting purposes.
- With regards to the S&R of bulb species, the best time for removal is during leaf fall ('blaarval'). In other words, toward the end of the growth period, but before or after the flowering.
- For most flowering bulb species in the Western Cape, this will be towards the end of the winter season (maybe early spring for the Southern Cape).
- The bulbs should then be removed along with some soil, placed in gel, bagged and then taken to a nursery for temporary storage or transplanted directly in the receiving area.
- The best time for planting is during the rainy seasons (March & October). A development area 3.2 km northeast of the site has been identified as a suitable planting (receiving) area for the S&R material.

An **Aquatic Biodiversity Compliance Statement** was conducted, and the following statement is of consideration.

The Site Investigation confirmed the presence of a natural Channelled Valley-Bottom (CVB) Wetland Area associated with a Non-Perennial Drainage Line situated approximately 420 metres northeast of the proposed development footprint. No aquatic resources were discovered on the concerned portion of Erf 21277 directly. Additionally, a Depression Wetland associated with the Mossel Bay Aerodrome situated approximately 800 metres

southwest of the concerned development footprint was also discovered as well as an artificial farm dam immediately east of Klipheuwel Weg in the headwaters of this Channelled Valley-Bottom Wetland system, with the origin and construction date of this artificial farm dam being unknown.

A Section 21(c) & (i) Risk Assessment Matrix as it pertains to the National Water Act, 1998 (Act No. 36 of 1998) was compiled related to the potential impacts of the development proposal on this Channelled Valley-Bottom (CVB) Wetland System. The proposed development will be located within 500 metres of this wetland system (within the regulated area) in accordance with General Notice 509 of 2016 for Section 21(c) and 21(i) Water Uses of the National Water Act, 1998 (Act 36 of 1998). Based on the outcome of the Section 21(c) & (i) Risk Assessment, the proposed activities associated with the construction and establishment of the proposed Mossel Bay Storage facility has been assessed to have a Low-Risk Significance (with mitigation) on the watercourse identified.

The author is also of the opinion that the legislative requirement for the proposed storage and solar development on a portion of Erf 21277 in Aalwyndal to register a GA (General Authorisation) in terms of the National Water Act, 1996 (Act No. 36 of 1998) for Section 21 (c) & (i) water use activities, with the BreedeOlifants Catchment Management Agency (BOCMA) could potentially be waived given the associated Low Risk Significance of anticipated impacts together with the significant distance (>400m) of the concerned property to the identified water resource.

The potential waiving of the requirement to register a GA should, however, be supported and confirmed by the Breede-Olifants Catchment Management Agency.

According to Rudzani Makahane from BOCMA, sent via email in correspondence to the revised Aquatic Assessment Report, the following confirmation pertaining to the above has been obtained, "Your request has been granted and the GA is therefore not required."

The proposed structures/infrastructure was assessed to have minimal impact on this wetland system given the location of the development proposal in relation to this aquatic system (>400 metres), the relatively small scale of the development, the fact that, although limiting, will still allow for free movement of water and sediments through this system and the Present Ecological State of this wetland system which was assessed to be Largely Modified (PES Category D) as a result of historical anthropogenic factors. Therefore the proposed development will not have an impact on any surface or groundwater aquatic resources and mitigation measures have been suggested to limit any factors that might have an impact on the Channelled Valley-Bottom (CVB) Wetland System.

Mitigations to consider is as forth;

Development Management

- Contractor laydown areas are to be established outside of the 500-metre Regulatory Zone of the wetland system and only for a short duration in consultation with the competent authority.
- All development footprint areas to remain as small as feasibly possible and vegetation clearing to be limited to what is absolutely essential to complete the required works.
- Construction Activities should preferably be undertaken during the drier summer months, to minimise the impact on the Hydrological & Geomorphological Functioning of the wetland system.
- All construction debris and litter must be removed. It may be temporarily stockpiled outside the extent of the 500-metre regulatory buffer zone but must be removed and disposed of at a licensed Processing Facility at regular intervals as specified in the legally binding Environmental Management Plan (EMP) approved by the Competent Authority.
- Care must be taken, and all construction personnel must receive training on the risks of chemical contamination of the wetland area.

- Chemical spills within and surrounding the 500-metre wetland regulatory buffer zone should be immediately remediated utilizing an Emergency Spill Response Procedure to form part of the legally binding Environmental Management Plan (EMP) approved by the Competent Authority.

Vehicular Access

- All construction vehicles must be regularly inspected for leaks. Re-fuelling must take place on a sealed surface area to prevent the ingress of hydrocarbons into the topsoil.
- In the event of a vehicle breakdown, maintenance of vehicles must take place with care and the recollection of spillage should be practised near the surface area to prevent the ingress of hydrocarbons into the topsoil.
- All spills should they occur, should be immediately cleaned up and treated accordingly.

Soil

- Sheet runoff from excavations and stockpiles should be slowed down by the strategic placement of silt traps in accordance with the legally binding Environmental Management Plan (EMP).
- As far as feasibly possible, all construction activities should occur during the dry summer months (December - February).
- All stockpiles are to be protected with a suitable geotextile to prevent sedimentation.

A Heritage Impact assessment together with a Paleontological Impact Assessment and a Visual Impact Assessment was conducted and obtained the following results collectively and separately.

Heritage Impact Assessment:

Palaeontological and archaeological resources were anticipated but the desktop palaeontological study suggested that no significant fossils were likely to occur and the field survey revealed no archaeological materials. The landscape is considered to be a heritage resource but, in this case, it is a recently subdivided and only minimally developed rural smallholding area with no historical character. Nevertheless, there is no precedent for light industrial type developments, with the exception of the Mossel Bay Aerodrome which has to be located away from residential areas.

The only potentially significant impact identified is the visual intrusion of the site that a relatively high-density development would have within a low-density rural context. This was assessed as a medium significance impact but with mitigation (landscape plan with screening vegetation) this can be reduced to low significance.

The following recommendations were made by the author:

- The buildings must make use of visually recessive materials, colours and design principles;
- Fencing to be visually permeable and dark-coloured;
- A landscape plan that includes perimeter planting to screen the development must be compiled prior to the start of construction;
- Night time lighting must be minimised and light fittings must be designed to minimise light spillage;
- If any palaeontological material is found during the course of development then the HWC Fossil Find Procedure should be implemented and the find should be reported to the heritage authorities;
- If any archaeological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

Palaeontological Impact Assessment:

Since the site is predominantly underlain with the Skurweberg Formation bedrock a Palaeontological Impact Assessment was considered and obtained the following result.

The EAP was concerned regarding the effect the construction of the foundation may have on the subsurface which is considered to be weathered consisting of soil, and possibly grey windblown coversands in the majority of the proposed development site's places. The study concluded that the impact construction will have on the Skurweberg Formation will be limited.

The trenches for foundations for the buildings are expected to be conventional and 0.6 to 0.8 m in depth. The post holes for fencing are expected to be of similar depth, while footings for tall lamp poles are larger and deeper. The deepest excavations are for the conservancy tanks and are not expected to exceed ~2 m depth.

Additionally, the fossil content of the Silurian Skurweberg Fm. fluvial braid-plain sandstones is sparse. Trace fossils are recorded from the finer-grained, muddier beds attributed to shallow marine or estuarine settings.

Consequently, the sudden uncovering of fossils are highly unlikely as well as the disruption of the bedrock within the proposed development site.

As a result, the author of the assessment concluded that impacts on fossil heritage resources due to disturbance of the soil profile formed on the weathered Skurweberg Formation underlying the Erf 21277 Project Area are not anticipated. They recommend however, in case of the unexpected uncovering of fossil bones in the surficial coversands and soil, or buried archaeological material, or unmarked graves, it is recommended that a protocol for finds of potential fossil material (and buried artefacts), the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the Construction Phase of the project, basically "If fossil material is uncovered during excavations for foundations and other installations, stop work at that spot and report to Heritage Western Cape".

Visual Impact Assessment:

From the Assessment the author highlighted that visual framework presents a mix of developed and undeveloped properties with areas of natural vegetation interspersed with grazing fields and a mix of exotic and indigenous vegetation planted near dwellings and along fence lines. Although Aalwyndal has a sense of rural charm it does not present a distinctive scenic or cultural sense of place that must be protected and scenic, cultural and historical significance of the area is rated as low. The topography of the area furthermore serves to visually isolate Aalwyndal and partially screen views towards the proposed new developments planned for Erf 21277, Mossel Bay, from surrounding developments and scenic routes.

Residents and receptors related to the holiday and tourist industry are rated as highly sensitive and tourism is one of the major economic drivers of the Southern Cape. Although there is some tourist activity in Aalwyndal associated with the Mossel Bay Airfield and Guest Houses and farm accommodation offered, this is not one of the major areas of Mossel Bay associated with the tourist trade. New developments could be partially visible from the N2 view corridor, which has been identified as an important scenic tourist route, but this is at a distance of more than 2 km from the proposed development site at which new developments would not be clearly noticeable to receptors and potential visual impact would be low provided appropriate mitigation measures are put in place.

Although the visual absorption of the development site itself is low due to a lack of screening vegetation and relatively flat topography, the visual absorption capacity of the area is moderate to high due to the screening effect of existing structures and taller vegetation in the areas surrounding the development site. Changes will be brought about to the existing visual environment of Aalwyndal should the proposed development go ahead, but such changes could be absorbed within the existing visual character of the area.

Where potential visual impacts can be rated as moderate to high without mitigation, the significance of these impacts can be reduced to moderate to low if appropriate mitigation measures are put in place. In light of the above it is recommended that the proposed development be approved subject to the implementation of

mitigation measures to soften the potential visual impacts to integrate the new developments with the existing character of Aalwyndal.

As a result, the proposed development will be noticeable to tourists and residents of Aalwyndal, particularly around Nagtegaal Street which is the main access route to the Mossel Bay Airfield. The proposed development could also potentially be partially visible to tourists and road users travelling on the N2 towards Mossel Bay.

They recommend the following mitigation measures to be implemented both during the construction and operational phase.

Construction phase mitigation measures

- Locate site camp and temporary structures within an appropriate area that is not visible from the most prominent views and routes frequented by residents and tourists in Aalwyndal.
- Building works on site must be screened with site hoarding constructed to a minimum height of 1800mm comprising a double layer of 80% shade netting, securely fixed to three horizontal 114 x 38mm treated timber members top, middle and bottom fixed to 114 x 114mm treated timber posts or poles at 3m centres set securely into ground to a minimum depth of 700mm and including all necessary corner posts, stays, etc. The contractor is to maintain all hoardings and keep clean and finally remove and make good on completion of the contract.
- Disturbance area and hoarding must be limited to the smallest area possible needed for construction.
- Existing screening vegetation to remain on site must be protected and fenced off from construction area.
- Temporary site lighting if required must be kept to a minimum and not be flood lighting wherever possible.
- The construction site must be kept clean and in a neat condition at all times during the construction period.
- Make good and rehabilitate all areas disturbed during the construction period within 3 months after completion of the building works.

Design and Operational Phase mitigation measures

- Use visually permeable fencing rather than boundary walls, to visually integrate new developments with the existing rural landscape.
- Use vegetated buffers along site boundaries to screen new developments from scenic views and routes. Vegetation must attain a height of at least 5 - 9 meters at maturity to provide adequate screening. Although the natural vegetation in the Aalwyndal area is not rich in tall growing tree species hardy drought resistant indigenous trees that can withstand coastal conditions such as *Brachyleana discolor*, *Searsia crenata* and *Buddleja saligna* can be closely planted to form tall hedges that will screen new developments. Non-invasive, evergreen, tall growing exotic trees that complement the existing landscape typology can also be considered.
- Maintain new tree and shrub planting until it is self-sufficient.
- Buildings and roadways must be positioned along contours to limit cut and fill operations wherever possible.
- Rehabilitate all cut and fill areas around new developments directly after construction to minimise visual intrusion.
- Reduce massing of built form by making use of setbacks from the boundary along the street and side boundaries. Setback area will provide space for vegetated buffers to reduce visual intrusion from prominent view corridors. Step building mass down towards roadway and side boundary so that the largest storage units are not located on the street and side boundary with the adjacent Erf 21276.
- Use finishes and colours on external building envelope that will merge with the surrounding landscape and recede from view from a distance.
- Reflective surfaces must be kept to a minimum and shaded with roof overhangs and / or screens to limit glare. Use mat finish paint on external surfaces.

Lighting design must conform to the following:

- Ensure lighting sources are top covered and directed only where needed ensuring that no light spillage occurs.
- Ensure that no open light sources are visible from beyond the site.
- Avoid flood lighting and spot lighting for security purposes.

Animal Species Assessment:

A Terrestrial Animal Species Impact Assessment has been commissioned to ensure the protection of the identified animal species as contained in the Screening Tool. The following findings were made;

During the site visit, it was observed that none of the eight Species of Conservation Concern (SCC) identified in the screening tool report were present. The vegetation around the site is too disturbed and close to human habitation for more sensitive species like *C. maurus*, *C. ranivorus*, and *N. denhami* to be found there. *C. maurus* and *N. denhami* might exist in similar but less disturbed areas further west of the site, whereas *C. ranivorus* would require a nearby wetland, which is absent.

A. montanus is highly unlikely to be present at the site due to its preference for arid fynbos vegetation on rocky substrates, which contrasts with the vegetation structure at the site. Furthermore, the nearest sighting of this species is over 90 km away. *L. littoralis*, another insect SCC, is also improbable to be found at the site because its typical habitats are limestone outcrops or coastal fynbos, neither of which are present at this location.

Sensitive Species 5 is not expected to be at the site, as it is restricted to specific reserves in the Western Cape where it has been reintroduced, and the study site does not offer enough prey to sustain this species.

Similarly, *B. sylvaticus* and *C. notata*, both bird species, are unlikely to be found at the study site due to the sparse vegetation cover, especially of large shrubs and trees, which these species require.

The site visit recorded a total of 25 animal species, including seven birds, 15 insects, two mammals, and one reptile species. None of these species are of conservation concern, but noteworthy sightings included the Spotted veld antlion, Amethyst small fruit chafer, and a Parrot-beaked tortoise.

Due to the absence of all the SCC from the study site, the site sensitivity could be considered Low. Although the entire development footprint will be transformed, the remaining vegetation on the rest of the property will still be contributing as ecological corridors for the plants and animals in the area.

The proposed development will lead to the loss of habitat across the entire study site. To offset this impact, it is advised that the remaining portion of the property, especially towards the west, should be preserved as undisturbed as possible to serve as an ecological corridor. This corridor will aid in connecting fragmented habitats in the landscape.

If any planting is done on the property, such as for windbreaks or ornamental gardens, it is recommended to use locally-indigenous plant species. These plants can provide food and shelter for local animal species.

Instead of using rodenticides, especially anticoagulant rodenticides, for rodent control, it is discouraged. Instead, constructing and installing owl breeding boxes targeting species like the Barn owl or Spotted eagle-owl is recommended. These owl species are native to the Mossel Bay area and can effectively control rodent populations without the risks associated with rodenticides.

Furthermore, planting locally indigenous plants along the property's edge is advised to facilitate the movement of small animals such as insects, birds, mammals, and reptiles. This inclusion of native plants would help mitigate the habitat loss caused by the development, especially in terms of allowing wildlife to move across the landscape.

Civil Aviation:

An Civil Aviation Impact Assessment has been conducted by Tappas Aviation Consultant in January 2024, discussing the potential of the proposed development to interfere with the Obstacle Limited Surfaces of airports in the vicinity of the project area or to interfere with any other aviation promulgated areas surrounding the development footprint.

The following findings were generated;

The proposed development location is located inside the Mossel Bay Airport's Obstacle Limited Surfaces but outside the Runway Strip and Take-Off & Climb and Approach Flight Paths. It is thus not necessary do any assessments regarding the Take-Off & Climb and Approach Flight Paths, but it is necessary initiate an assessment for Mossel Bay Airport's Obstacle Limited Surfaces.

From the Drawings it can be confirmed that the proposed development Powerline is located 502 metres from the start of the Runway Strip and 207 metres from the Outer Horizontal Surface. The total length of the proposed development is 160 metres. It can also be confirmed that the proposed development will not interfere with the Inner Horizontal Surface of the Mossel Bay Airport's Obstacle Limited Surfaces. The height of the proposed development is 14 meters, from the drawing confirms that the proposed development is therefore 31 meters below the start of the Inner Horizontal Surface, which is 45 meters above the airport elevation.

Agricultural Compliance:

Digital Soils Africa drafted an Agricultural Compliance Statement in February 2024 and following information was received.

The National Web-based Environmental Screening Tool classifies the agricultural sensitivity of the site as medium, while the land capability, according to DAFF (2017), also falls under a medium classification, with no cultivated crops present on the site as indicated by the screening tool.

According to the Department of Agriculture, Forestry and Fisheries (DAFF, 2017), the climate capability of the study area is rated as 5, indicating moderate climate capability. The study area falls within the Db land type, characterized by duplex soils, where sandy topsoil abruptly overlies more clayey subsoil, making up over 50% of the land type, with less than 50% of the duplex soils containing non-red B horizons. The soil capability is rated as 4, indicating low to moderate capability, while the terrain capability is rated between 6 and 7, representing moderate to high capability. Land capability values range from 7 (low to moderate) to 8 (moderate), placing the site on the boundary between arable and non-arable land. The desktop assessment aligns with the screening tool's classification of medium agricultural sensitivity. **Given the small development footprint and its minimal impact on current agricultural activities, the specialist recommends that the development proceed.**

2.	List the impact management measures that were identified by all Specialist that will be included in the EMPr
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A **Botanical Survey** of the site requested that as a mitigation measure should the development proceed, consideration should be given to the search and rescue of *Euphorbia procumbens* of which there are between 50 and 100 plants on site, and if possible, the three Species of Conservation Concern within the area.

Mark Berry has subsequently compiled a detailed Search and Rescue Plan, dated February 2024, outlining the following requirements;

- Plant species considered suitable for search and rescue include certain succulents and geophytes. *Carpobrotus cf. deliciosus*, *Acrodon bellidiflorus*, *Adromischus caryophyllaceus*, *Crassula cultrate*, *Euphorbia procumbens*, *Hypoxis villosa*, *Ledebouria revoluta*, *Ornithogalum dubium*, *Ornithogalum juncifolium*, and *Satyrium membranaceum*.

- A large number (50-100 plants) of *Euphorbia procumbens* were recorded, mainly along the southern boundary of the site. An effort should be made to salvage as many as possible of these. *Carpobrotus cf. deliciosus* can be partly or wholly removed for replanting purposes.
- With regards to the S&R of bulb species, the best time for removal is during leaf fall ('blaarval'). In other words, toward the end of the growth period, but before or after the flowering.
- For most flowering bulb species in the Western Cape, this will be towards the end of the winter season (maybe early spring for the Southern Cape).
- The bulbs should then be removed along with some soil, placed in gel, bagged and then taken to a nursery for temporary storage or transplanted directly in the receiving area.
- The best time for planting is during the rainy seasons (March & October). A development area 3.2 km northeast of the site has been identified as a suitable planting (receiving) area for the S&R material.

An **Aquatic Biodiversity Compliance Statement** was conducted and the following statement is of consideration.

Development Management

- Contractor laydown areas are to be established outside of the 500-metre Regulatory Zone of the wetland system and only for a short duration in consultation with the competent authority.
- All development footprint areas to remain as small as feasibly possible and vegetation clearing to be limited to what is essential to complete the required works.
- Construction Activities should preferably be undertaken during the drier summer months, to minimise the impact on the Hydrological & Geomorphological Functioning of the wetland system.
- All construction debris and litter must be removed. It may be temporarily stockpiled outside the extent of the 500-metre regulatory buffer zone but must be removed and disposed of at a licensed Processing Facility at regular intervals as specified in the legally binding Environmental Management Plan (EMP) approved by the Competent Authority.
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- Chemical spills within and surrounding the 500-metre wetland regulatory buffer zone should be immediately remediated utilizing an Emergency Spill Response Procedure to form part of the legally binding Environmental Management Plan (EMP) approved by the Competent Authority.

Vehicular Access

- All construction vehicles must be regularly inspected for leaks. Re-fuelling must take place on a sealed surface area to prevent the ingress of hydrocarbons into the topsoil.
- In the event of a vehicle breakdown, maintenance of vehicles must take place with care and the recollection of spillage should be practised near the surface area to prevent the ingress of hydrocarbons into the topsoil.
- All spills should they occur, should be immediately cleaned up and treated accordingly.

Soil

- Sheet runoff from excavations and stockpiles should be slowed down by the strategic placement of silt traps in accordance with the legally binding Environmental Management Plan (EMP).
- As far as feasibly possible, all construction activities should occur during the dry summer months (December - February).
- All stockpiles are to be protected with a suitable geotextile to prevent sedimentation.

A **Heritage Impact assessment together with a Paleontological Impact Assessment and a Visual Impact Assessment** was conducted and recommend the following impact management measures be implemented

Paleontological Impact Assessment:

In case of the unexpected uncovering of fossil bones in the surficial cover sands and soil, or buried archaeological material, or unmarked graves, it is recommended that a protocol for finds of potential fossil material (and buried artefacts), the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the Construction Phase of the project, basically "If fossil material is uncovered during excavations for foundations and other installations, stop work at that spot and report to Heritage Western Cape".

Visual Impact Assessment:

They recommend the following mitigation measures to be implemented both during the construction and operational phase.

Construction phase mitigation measures

- Locate site camp and temporary structures within an appropriate area that is not visible from the most prominent views and routes frequented by residents and tourists in Aalwyndal.
- Building works on site must be screened with site hoarding constructed to a minimum height of 1800mm comprising a double layer of 80% shade netting, securely fixed to three horizontal 114 x 38mm treated timber members top, middle and bottom fixed to 114 x 114mm treated timber posts or poles at 3m centres set securely into ground to a minimum depth of 700mm and including all necessary corner posts, stays, etc. The contractor is to maintain all hoardings and keep clean and finally remove and make good on completion of the contract.
- Disturbance area and hoarding must be limited to the smallest area possible needed for construction.
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- The construction site must be kept clean and in a neat condition at all times during the construction period.
- Make good and rehabilitate all areas disturbed during the construction period within 3 months after completion of the building works.

Design and Operational Phase mitigation measures

- Use visually permeable fencing rather than boundary walls, to visually integrate new developments with the existing rural landscape.
- Use vegetated buffers along site boundaries to screen new developments from scenic views and routes. Vegetation must attain a height of at least 5 - 9 meters at maturity to provide adequate screening. Although the natural vegetation in the Aalwyndal area is not rich in tall growing tree species hardy drought resistant indigenous trees that can withstand coastal conditions such as *Brachyleana discolor*, *Searsia crenata* and *Buddleja saligna* can be closely planted to form tall hedges that will screen new developments. Non-invasive, evergreen, tall growing exotic trees that complement the existing landscape typology can also be considered.
- Maintain new tree and shrub planting until it is self-sufficient.
- Buildings and roadways must be positioned along contours to limit cut and fill operations wherever possible.
- Rehabilitate all cut and fill areas around new developments directly after construction to minimise visual intrusion.
- Reduce massing of built form by making use of setbacks from the boundary along the street and side boundaries. Setback area will provide space for vegetated buffers to reduce visual intrusion from prominent view corridors. Step building mass down towards roadway and side boundary so that the largest storage units are not located on the street and side boundary with the adjacent Erf 21276.
- Use finishes and colours on external building envelope that will merge with the surrounding landscape and recede from view from a distance.
- Reflective surfaces must be kept to a minimum and shaded with roof overhangs and / or screens to limit glare. Use mat finish paint on external surfaces.

Lighting design must conform to the following:

- Ensure lighting sources are top covered and directed only where needed ensuring that no light spillage occurs.
- Ensure that no open light sources are visible from beyond the site.
- Avoid flood lighting and spot lighting for security purposes.

Animal Species Assessment:

Due to the absence of all the SCC from the study site, the site sensitivity could be considered Low. Although the entire development footprint will be transformed, the remaining vegetation on the rest of the property will still be contributing as ecological corridors for the plants and animals in the area.

The proposed development will lead to the loss of habitat across the entire study site. To offset this impact, it is advised that the remaining portion of the property, especially towards the west, should be preserved as undisturbed as possible to serve as an ecological corridor. This corridor will aid in connecting fragmented habitats in the landscape.

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Instead of using rodenticides, especially anticoagulant rodenticides, for rodent control, it is discouraged. Instead, constructing and installing owl breeding boxes targeting species like the Barn owl or Spotted eagle-owl is recommended. These owl species are native to the Mossel Bay area and can effectively control rodent populations without the risks associated with rodenticides.

Furthermore, planting locally indigenous plants along the property's edge is advised to facilitate the movement of small animals such as insects, birds, mammals, and reptiles. This inclusion of native plants would help mitigate the habitat loss caused by the development, especially in terms of allowing wildlife to move across the landscape.

3.	List the specialist investigations and the impact management measures that will not be implemented and provide an explanation as to why these measures will not be implemented.
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All the impact management measures suggested by the specialist studies will be considered and implemented as per the Environmental Management Programme.

4.	Explain how the proposed development will impact the surrounding communities.
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The proposed development will provide employment opportunities during both the constructional and operational phase, both in terms of running the facility and in terms of the business that will be able to operate from the facility. Additionally, this will also bring about economic growth within the area via independent investments and as the access and use of storage is also a common requirement in modern society and this has been identified by the proponent as a need in the area.

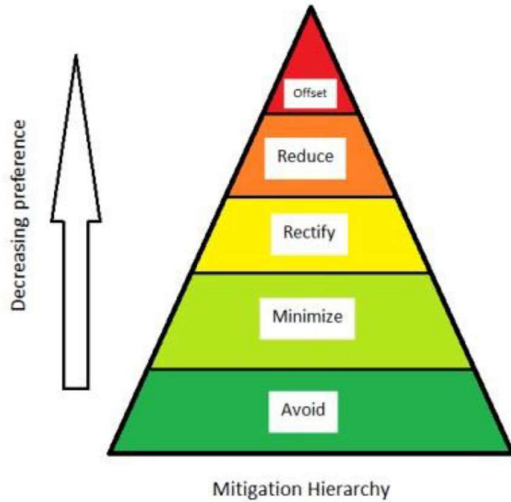
The proposed development can also potentially cause visual impacts associated with building material placement during the construction phase and potential noise impacts associated with the use of construction machinery during construction phase as well as temporary traffic impacts during the operational phase.

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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Climate change has not been taken into consideration as part of this proposed development.

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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No conflicting recommendations occurred.

7.	Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.
All mitigation measures as provided in the Specialist Reports has been included in the EMP and this 2 nd Draft BAR and have been incorporated as part of the Preferred Site Development Plan.	
8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.
The mitigation hierarchy as advocated by the DEA&DP et al. (2013) would be followed as follows: The mitigation hierarchy, as depicted below was used to determine the best possible design from the proposed development. Avoided: The Species of Conservation Concern identified in the Botanical Assessment cannot be successfully conserved/avoided in its current location in the long term. Minimised: The implementation of the EMPr will result in the minimisation of potential aquatic, botanical, and visual impacts. Rectified: The layout has been adjusted based on the specialist inputs and the Biodiversity Offset report. The problems at the sewer station have now also been identified and will be rectified. Reduced: The impacts of the development on the terrestrial vegetation, aquatic watercourses and visual intrusion will be reduced via the mitigation measures during construction and operation. Offset: No Biodiversity Offset for the management of the proposed site was necessary other than the confirmation of the site towards which the searched and rescued SCC will be transplanted.  The diagram illustrates the Mitigation Hierarchy as a pyramid with five horizontal layers. From bottom to top, the layers are: Avoid (green), Minimize (light green), Rectify (yellow), Reduce (orange), and Offset (red). To the left of the pyramid is a vertical arrow pointing upwards, labeled 'Decreasing preference'. Below the pyramid is the text 'Mitigation Hierarchy'.	

SECTION J: GENERAL

1. Environmental Impact Statement

1.1.	Provide a summary of the key findings of the EIA.
Based on this Environmental Impact Assessment for the proposed Storage Facility, the following is concluded: An application has been filed for the establishment of a storage facility on Portion A of Erf 21277 in Aalwyndal, Mossel Bay. The proposed development site is situated in the Aalwyndal area, west of Voorbaai. Aalwyndal is	

recognized for its smallholdings, each approximately 7.7 hectares in size, and is presently zoned as Single Residential Zone I. Currently Erf 21277 is used as a horse paddock and for grazing with surrounding erven functioning in agricultural and residential pursuits. The agricultural land is essentially not affected by this land use application as Portion A is already zoned Single Residential Zone I and situated well within the urban edge.

The total extent of Erf 21277, Aalwyndal, Mossel Bay, is approximately 7.7 hectares in extent and is situated along Nagtegaal Street. The property is currently zoned Single Residential Zone 1 and will be subdivided as part of the application. The development is proposed on Portion A which comprises 1.44ha along Nagtegaal Street and will be rezoned from Single Residential Zone 1 to Industrial Zone 1 (light industry) in line with the Spatial Development Framework for the Aalwyndal precinct to accommodate the proposed self-storage facility. The development herewith applied for on Portion A includes the following components and has been proposed to be developed in two phases:

Phase 1 of the development will entail the development of 228 small self-storage units allocated in four separate blocks with varying building dimensions and unit sizes.

Block 1: Comprising of 42 storage units (3m x 6m).

Block 2: Comprising of 12 storage units (3m x 9m) as well as 1 storage units (5.6m x 9m).

Block 3: Comprising of 35 storage units (3m x 4m) as well as 35 storage units (3m x 7m), thus 70 units in total.

Block 4: Comprising of 33 storage units of (3m x 7.8m); 35 storage units of (3m x 3m); as well as 35 storage units of (3m x 4m).

The total development footprint of phase 1 is proposed to be approximately 4281m². Additionally, an office/toilet structure will be developed comprising of a 38m² footprint.

Phase 2 of the development will entail the development of another 228 small self-storage units allocated in four separate blocks with building dimensions and unit sizes.

Block 5: Comprising of 42 storage units (3m x 6m).

Block 6: Comprising of 12 storage units (3m x 9m) as well as 1 storage units (5.6m x 9m).

Block 7: Comprising of 35 storage units (3m x 4m) as well as 35 storage units (3m x 7m), thus 70 units in total.

Block 8: Comprising of 33 storage units of (3m x 7.8m); 35 storage units of (3m x 3m); as well as 35 storage units of (3m x 4m).

The total development footprint of phase 2 is proposed to be approximately 4281m². Additionally, an office/toilet structure will be developed comprising of a 38m² footprint.

In total, the proposed development will consist of 456 small self-storage units and a development area of 8562 m².

It is proposed that the administration office and toilet facility will be connected to a conservancy tank and the existing water line along Nagtegaal Street will supply the required potable water.

Furthermore, as per the Preferred Site Development Plan (AD21277/2023 dated 21 January 2024) 75 parking bays are required and 76 shaded parking bays have been provided for. One parking bay will be distributed and constructed per 100 m² of self-storage units.

The development will also include access roadways, stormwater run-off drainage and perimeter security fencing, lighting, and access control. Additionally, the proposed development will also consist of private internal access roads and civil infrastructure utilizing a Conservancy Tank System.

The entrance and exit to the proposed development are located on Nagtegaal Street as indicated on the site plan. Parking bays have been positioned along the southeastern and northwestern boundary of the site to set the buildings back from the road interface and minimise visual intrusion.

The development will also include access roadways, stormwater run-off drainage and perimeter security fencing and lighting and access control.

The need for water, electricity and sewerage disposal is very limited due to the nature of the development proposal. A conservancy tank is proposed for the toilet facility of the administrative office building, to be serviced by a private contractor as the need occurs. A water connection is available for the basins and the toilet. Electricity connections are also readily available.

From a botanical perspective, the site occurs in a typical coastal fynbos environment. This is confirmed by the presence of fynbos species, such as *Aspalathus opaca*, *Metalasia acuta* and several *Herichrysum* species. According to the South African Vegetation Map, the vegetation occurring on site and the surrounding area has been mapped as North Langeberg Sandstone Fynbos. Mossel Bay Shale Renosterveld and Hartenbos Dune Thicket (along the coast) occur further away to the northeast and south.

While the vegetation found on site can be described as fynbos, it also shows an affinity with Mossel Bay Shale Renosterveld with the presence of renosterveld species such as *Elytropappus rhinocerotis*, *Oedera genistifolia* and *Barleria pungens*. Structurally, it can be described as a dwarf (<0.25 m) closed shrubland following Campbell's (1981) classification. The vegetation is a bit higher in certain areas where the shrub component is less disturbed. *Cynodon dactylon* (kweek) and *Helichrysum niveum* are dominant ground covers. The fynbos shows heavy disturbance by grazing and some alien infestation, notably *Acacia cyclops* (rooikrans) and *Cynodon dactylon*.

Many Indigenous shrub species were found during the site visit, three Species of Conservation Concern were recorded on site, namely *Hermannia lavandulifolia* (Vul), *Polygala pubiflora* (Vul) and *Ruellia pilosa* (Vul). According to the online Red List 2 of South African Plants, they are all under threat from crop cultivation, coastal developments and alien infestation. *Polygala pubiflora* is a regional endemic, mostly found in renosterveld remnants. It is still frequently encountered (by the author and others) in the Mossel Bay area, but never in large numbers. It is difficult to spot when not in flower. *Hermannia lavandulifolia* is still well represented in the Mossel Bay area and is frequently encountered. A large number (50-100 plants) of *Euphorbia procumbens* were also recorded, mainly along the southern boundary of the site. Despite being widespread between Riversdale and the Eastern Cape and not listed as threatened, its numbers are very low, with only a few records along the Garden Route.

The Botanical impact assessment indicated that the site has been severely disturbed and that the impacts from a Botanical perspective will be low. Given the disturbed state of the site, a **LOW TO MODERATE** impact on vegetation and conservation status is observed. The **impact will be slightly more** for the encountered Species of Conservation Concern, which are mostly still well represented in the larger Mossel Bay area.

It is recommended that should development proceed these plants be searched, rescued, and replanted in a suitable area (a rehabilitation area within the Renosterbos Estate has been identified for the proposed "offset" area) nearby where they can be protected into perpetuity.

Mark Berry has subsequently compiled a detailed Search and Rescue Plan, dated February 2024, outlining the following requirements;

- Plant species considered suitable for search and rescue include certain succulents and geophytes. *Carpobrotus cf. deliciosus*, *Acrodon bellidiflorus*, *Adromischus caryophyllaceus*, *Crassula cultrate*, *Euphorbia procumbens*, *Hypoxis villosa*, *Ledebouria revoluta*, *Ornithogalum dubium*, *Ornithogalum juncifolium*, and *Satyrium membranaceum*.

- A large number (50-100 plants) of *Euphorbia procumbens* were recorded, mainly along the southern boundary of the site. An effort should be made to salvage as many as possible of these. *Carpobrotus cf. deliciosus* can be partly or wholly removed for replanting purposes.
- With regards to the S&R of bulb species, the best time for removal is during leaf fall ('blaarval'). In other words, toward the end of the growth period, but before or after the flowering.
- For most flowering bulb species in the Western Cape, this will be towards the end of the winter season (maybe early spring for the Southern Cape).
- The bulbs should then be removed along with some soil, placed in gel, bagged and then taken to a nursery for temporary storage or transplanted directly in the receiving area.
- The best time for planting is during the rainy seasons (March & October). A development area 3.2 km northeast of the site has been identified as a suitable planting (receiving) area for the S&R material.

The Site Investigation confirmed the presence of a natural Channelled Valley-Bottom (CVB) Wetland Area associated with a Non-Perennial Drainage Line situated approximately 420 metres northeast of the proposed development footprint and a Depression Wetland associated with the Mossel Bay Aerodrome situated approximately 800 metres southwest of the concerned development footprint. **No aquatic resources were discovered on the concerned portion of Erf 21277 directly.**

A Section 21(c) & (i) Risk Assessment Matrix as it pertains to the National Water Act, 1998 (Act No. 36 of 1998) was compiled related to the potential impacts of the development proposal on this Channelled Valley-Bottom (CVB) Wetland System. The proposed development will be located within 500 metres of this wetland system (within the regulated area) in accordance with General Notice 509 of 2016 for Section 21(c) and 21(i) Water Uses of the National Water Act, 1998 (Act 36 of 1998). Based on the outcome of the Section 21(c) & (i) Risk Assessment, the proposed activities associated with the construction and establishment of the proposed Mossel Bay Storage facility have been assessed to have a **LOW-RISK SIGNIFICANCE (WITH MITIGATION)** on the water source identified.

The author is also of the opinion that the legislative requirement for the proposed storage and solar development on a portion of Erf 21277 in Aalwyndal to register a GA (General Authorisation) in terms of the National Water Act, 1996 (Act No. 36 of 1998) for Section 21 (c) & (i) water use activities, with the BreedeOlifants Catchment Management Agency (BOCMA) could potentially be waived given the associated Low Risk Significance of anticipated impacts together with the significant distance (>400m) of the concerned property to the identified water resource.

The potential waiving of the requirement to register a GA should, however, be supported and confirmed by the Breede-Olifants Catchment Management Agency.

According to Rudzani Makahane from BOCMA, sent via email in correspondence to the revised Aquatic Assessment Report, the following confirmation pertaining to the above has been obtained, "Your request has been granted and the GA is therefore not required."

A Terrestrial Animal Species Impact Assessment has been commissioned to ensure the protection of the identified animal species as contained in the Screening Tool. The following finding were made;

During the site visit, it was observed that none of the eight Species of Conservation Concern (SCC) identified in the screening tool report were present. The vegetation around the site is too disturbed and close to human habitation for more sensitive species like *C. maurus*, *C. ranivorus*, and *N. denhami* to be found there. *C. maurus* and *N. denhami* might exist in similar but less disturbed areas further west of the site, whereas *C. ranivorus* would require a nearby wetland, which is absent.

The site visit recorded a total of 25 animal species, including seven birds, 15 insects, two mammals, and one reptile species. None of these species are of conservation concern, but noteworthy sightings included the Spotted veld antlion, Amethyst small fruit chafer, and a Parrot-beaked tortoise.

It is recommended that the **remainder of the property (particularly to the west) be left as undisturbed** as possible, to act as a refugium ecological corridor in an increasingly-fragmented landscape.

With regard to the matter of airfield obstruction, the proposed development location is **located inside the Mossel Bay Airport's Obstacle Limited Surfaces but outside the Runway Strip and Take-Off & Climb and Approach Flight Paths**. It is thus not necessary to do any assessments regarding the Take-Off & Climb and Approach Flight Paths, but it is necessary to initiate an assessment for Mossel Bay Airport's Obstacle Limited Surfaces. It can be confirmed that the **proposed development will not interfere with the Inner Horizontal Surface of the Mossel Bay Airport's Obstacle Limited Surfaces**.

According to the Department of Agriculture, Forestry and Fisheries (DAFF, 2017), the climate capability of the study area is rated as 5, indicating moderate climate capability. The study area falls within the Db land type, characterized by duplex soils, where sandy topsoil abruptly overlies more clayey subsoil, making up over 50% of the land type, with less than 50% of the duplex soils containing non-red B horizons. The soil capability is rated as 4, indicating low to moderate capability, while the terrain capability is rated between 6 and 7, representing moderate to high capability. Land capability values range from 7 (low to moderate) to 8 (moderate), placing the site on the boundary between arable and non-arable land. The desktop assessment aligns with the screening tool's classification of medium agricultural sensitivity. **Given the small development footprint and its minimal impact on current agricultural activities, the specialist recommends that the development proceed.**

Finally, from a Heritage perspective, FC Holm CC conducted a visual impact assessment and concluded that the site, situated at an elevated position partially visible from the N2 scenic route, has limited visibility due to its topography and proximity to existing developments. The area is classified as having low scenic, cultural, and historical significance, resulting in a moderate expected visual impact from the new development, which falls under Category 4. Mitigation measures have been suggested to minimize visual impacts during construction and operation.

An archaeological and cultural heritage impact assessment yielded a Positive Record of Decision from Heritage Western Cape, indicating no significant archaeological materials were present.

A palaeontological impact assessment classified the site's sensitivity as high, necessitating further study. However, the actual sensitivity rating was deemed **LOW**, primarily due to the geological characteristics of the underlying Skurweberg Formation, which limits the potential for fossil heritage resources. Consequently, significant impacts on fossil heritage from construction activities are not anticipated. They recommend however, in case of the unexpected uncovering of fossil bones in the surficial coversands and soil, or buried archaeological material, or unmarked graves, it is recommended that a protocol for finds of potential fossil material (and buried artefacts), the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the Construction Phase of the project, basically "If fossil material is uncovered during excavations for foundations and other installations, stop work at that spot and report to Heritage Western Cape".

All recommendations included as part of the Specialist Reports have been taken into account and included within the Draft Environmental Management Programme. No significant impacts should occur as a result of the proposed Storage Facility. All No-Go areas around the proposed development footprint will be adequately marked and demarcated prior to site establishment or site clearance.

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)
Please refer to 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.
Positive Impacts - Given the disturbed state of the site, the impact on vegetation type per se is of low to moderate concern. - Construction phase job opportunities for the surrounding low-income areas; - Operational long-term job opportunities; - Provision of a much-needed commercial (storage) component; - Additional investment and rates and taxes to the area and municipality. Negative Impacts - The impact will be slightly more for the encountered Species of Conservation Concern, but with implementing the search and rescue mitigation, Conservation Concern Species such as <i>Euphorbia procumbens</i> will be placed in a more desirable environment. - Potential visual impacts (visual intrusion) associated with both the construction and operational phases; - Potential noise impacts associated with the use of machinery during the construction phase; - Potential traffic impacts during the construction phase.	

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
- Search, rescue and rehabilitation of the Three Species of Conservation Concern outlined in this report as well as stated in the Botanical Survey. - Additionally, ensure the search and rescue of <i>Euphorbia procumbens</i> within the site before construction; - Enforcement mitigation measure as set forth in this report and the EMPr to limit the potential conveyance of contaminated water or excess sediment loads from the construction activities into the natural Channelled Valley-Bottom (CVB) Wetland Area; - Make use of screening vegetation and visually recessive materials and finishes to limit visual intrusion towards the proposed development.	
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.
According to the visual impact assessment conducted by FC Holm CC, it is recommended that the proposed storage facility be authorised, but subject to the following recommendation which should be included as conditions of authorisation: - The buildings must make use of visually recessive materials, colours and design principles; - Fencing to be visually permeable and dark-coloured; - A landscape plan that includes perimeter planting to screen the development must be compiled prior to the start of construction; - Night time lighting must be minimised and light fittings must be designed to minimise light spillage; - If any palaeontological material is found during the course of development then the HWC Fossil Find Procedure should be implemented and the find should be reported to the heritage authorities; and	

	If any archaeological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.
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.
	It is Kapp Environmental Consultants (KAPPEC) professional opinion that the proposed development should be authorised to take place. This report has proved that the impacts associated with the development can be managed and mitigated in full and that a significant number of positive socio-economic impacts will also result from the development of the site. The following conditions of approval are proposed: - Compliance with the attached and legally binding Environmental Management Programme (EMPr). - Appointment of a suitably qualified Environmental Control Officer (ECO) to oversee compliance with the Environmental Management Plan (EMP). - The ECO is to conduct fortnightly Environmental Control Audits on the state of the environment and areas of compliance and non-compliance with the Environmental Management Plan (EMP). The ECO to compile monthly ECO Audit Reports and these reports must be made available to the Department of Environmental Affairs and Development Planning (DEA&DP) and Mossel Bay Municipality. - Fines should be included in the Environmental Management Plan (EMP) to enforce compliance with the Environmental Management Plan (EMP). - Full compliance and implementation of recommendations / mitigation measures as defined in each of the specialist studies and outlined throughout the report should be implemented.
2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.
	Not applicable
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 should be valid for a period of 5 years from the date of issue and the construction activities should be concluded within 2 years.

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.

The proposed development will require very limited potable water during the operational phase.

4. Waste

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

A conservation tank is proposed for the toilet facility of the administrative office building, to be serviced by a private contractor as the need occurs.

5. Energy Efficiency

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

Energy-efficient appliances and lightbulbs will be used where practicably possible.

Please refer to the EMPr for the additional measures required.