

**PROPOSED LIGHT INDUSTRIAL DEVELOPMENT
(STORAGE FACILITY) ON PORTION A OF ERF 21277
AALWYNDAL, MOSSEL BAY MUNICIPALITY,
WESTERN CAPE.**

EXECUTIVE SUMMARY TO DRAFT BASIC ASSESSMENT REPORT

DEA&DP REF. NO. 16/3/3/6/7/1/D6/29/0075/21

Submitted to:

Department of Environmental Affairs and Development Planning (DEA&DP)

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1. INTRODUCTION

The proponent, Dream Supreme Properties 14 cc, appointed KAPPEC as an independent environmental consultancy to facilitate the Environmental Impact Assessment (EIA) and public participation process required for the project.

The proposed development is located in Aalwyndal on Nagtegaal Street, situated to the west of Voorbaai. 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 Kwanqaba 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. The area where the site is located comprises mostly smallholdings approximately 7ha in size of which the majority is currently zoned 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.

2. NEMA EIA PROCESS AND RELEVANT EIA REGULATIONS (2014), AS AMENDED

The NEMA is the umbrella framework for all environmental legislation primarily to assist with implementing the environmental rights contained within the Constitution. The NEMA makes provision for duty of care to prevent, control and rehabilitate the effects of pollution and environmental degradation. The fundamental principles included in the NEMA must be adhered to and taken into consideration during the impact assessment phase.

Section 24D and 24(2) makes provision for the publication of a list and associated regulations containing activities identified which may not commence without obtaining prior environmental authorisation from the competent authority. These regulations are referred to as the Environmental Impact Assessment (EIA) Regulations and are discussed below.

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.
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 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.		

A Basic Assessment Application in terms of NEMA EIA Regulations must thus be undertaken in order to obtain an Environmental Authorization (EA) from the Department of Environmental Affairs and Development Planning (DEA&DP) to permit the proposed Site Development Pan. Application is therefore made to the Department of Environmental Affairs and Development Planning (DEA&DP) under the 2014 NEMA EIA Regulations.

3. DESCRIPTION OF PROPOSED DEVELOPMENT

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. 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 9.500 m.

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

Entrance to the proposed development is located on Nagtegaal street as indicated on the site plan (Appendix B1). Parking bays have been positioned along the southeastern boundary of the site to set the buildings back from the road interface and minimizing visual intrusion.



Figure 1: Depicts the rezoning of the proposed development site.

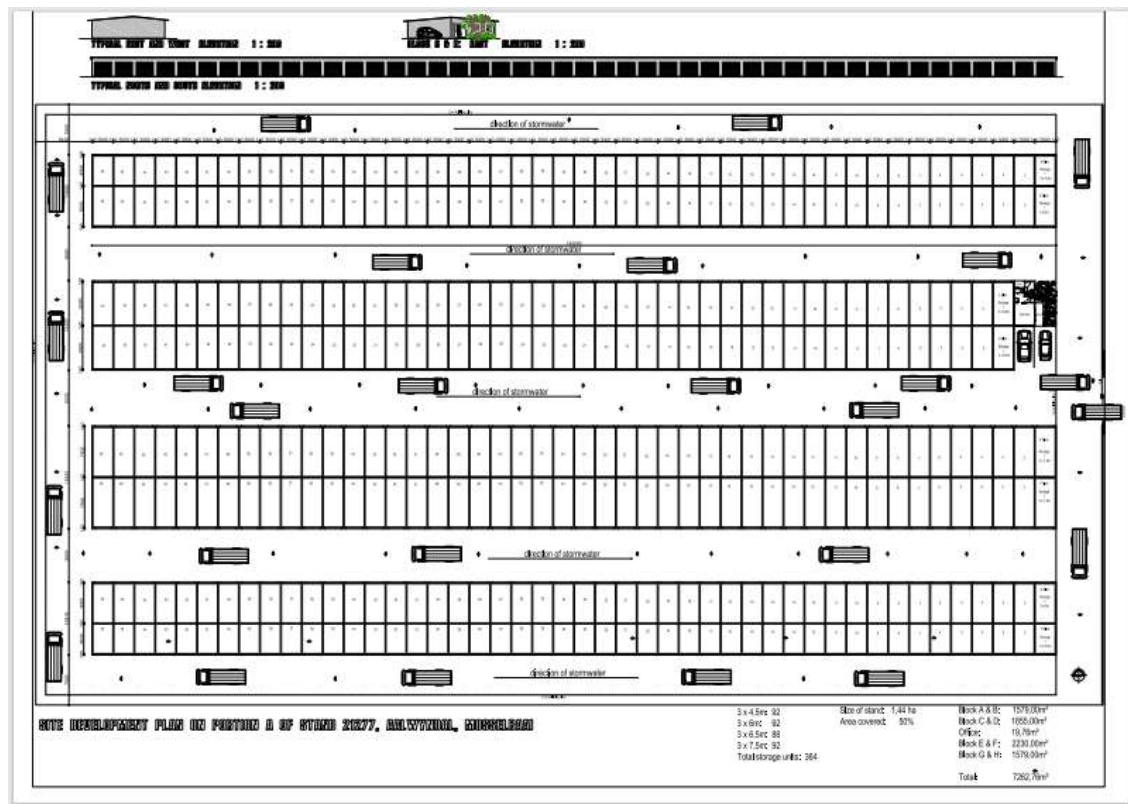


Figure 2: Proposed site development plan

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.

Provision of services

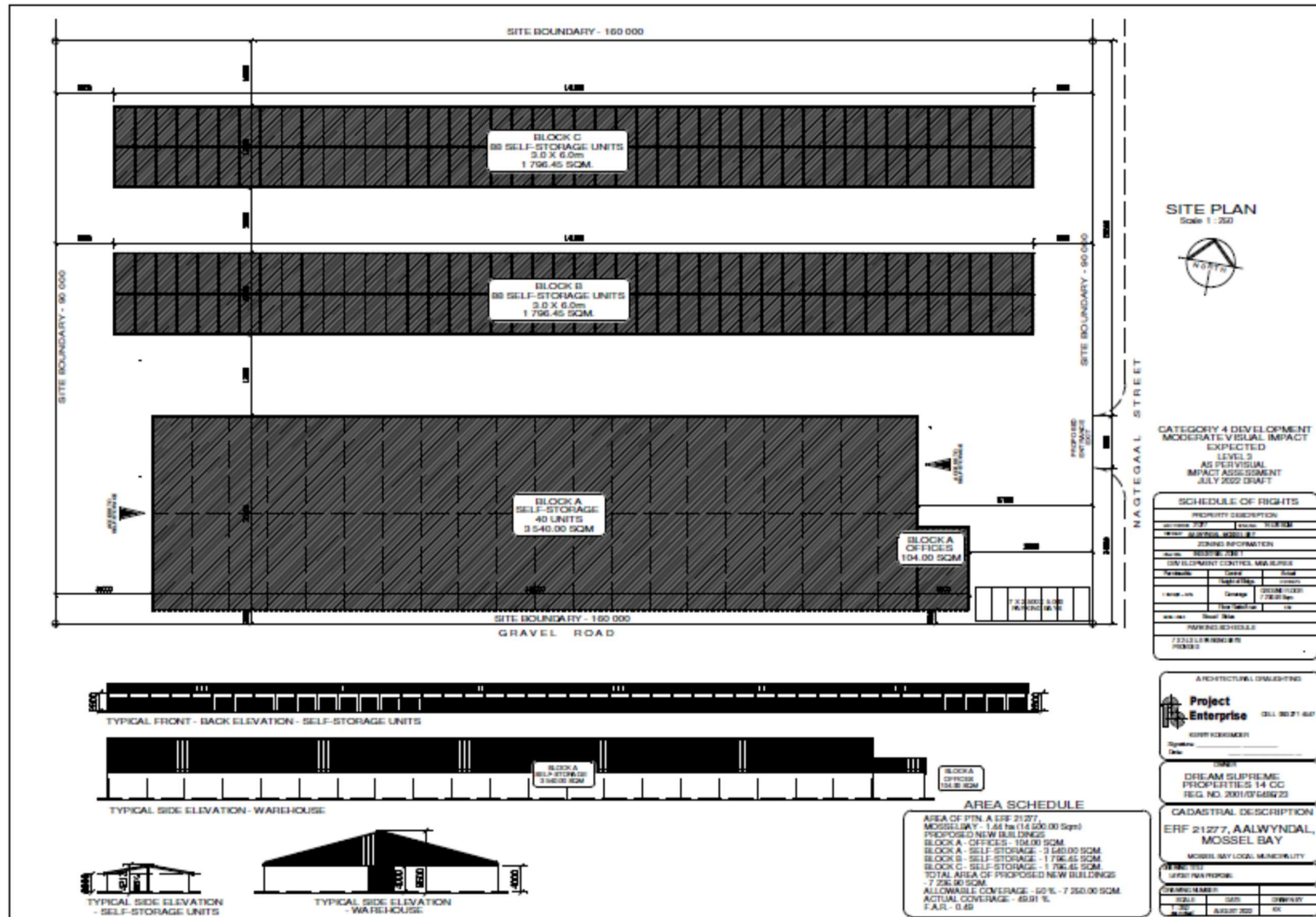
The need for municipal services is limited due to the nature of the development proposal for Portion A.

Economic impact

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.

Direct impact on surrounding properties

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.



Proposed Amended Site Development Plan

4. PUBLIC PARTICIPATION

A full public participation process will be conducted in order to notify potential additional I&APs in terms of Chapter 6 of the EIA Regulations (2014, as amended).

A full public participation process will furthermore be conducted in order to notify potential 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). KAPPEC only proposes to deviate in terms of Regulation 41 (b) (ii) of the EIA Regulations, 2014 (as amended) as follows:

Regulation 41 (b)

Giving written notice, in any manner provided for in section 47D of the NEMA, to – owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken”

The proposed Public Participation process proposed will therefore include the following:

Newspaper advertisement

An advertisement, notifying the public of the Part 2 Substantive Amendment Report and requesting potential Interested and Affected Parties (I&APs) to register with and submit their comments to Kapp Environmental Consultants (KAPPEC), will be placed in the Mossel Bay Advertiser Newspaper.

Site Notice Boards

To inform surrounding communities and immediately adjacent landowners of the proposed development, 2 Site Notice boards (Afr & Eng) will be erected at visible and accessible locations surrounding the site boundaries.

Direct notification of identified I&APs

Identified I&APs, including key stakeholders representing the following sectors, will be directly informed of the proposed development via the circulation of a comprehensive Executive Summary to:

- Provincial Authorities
- Local Authorities
- Ward Councillor
- Non-governmental organizations, and
- Adjacent residential complexes.

I&AP database

All Interested and Affected Parties will be included in an I&AP database.

Comments and responses

Comments and issues of concern contributed by I&APs will be listed, along with the I&APs name and means of communication in the Comment and Response Report.

Organs of State to be notified:

Table 1: Organs of State to be Notified during the PP Process

Department	Official	Address	Tel	Email
Eden District Municipality (Municipal Manager)	Monde Stratu			mm@gardenroute.gov.za
Eden District Municipality Community Services	Dr 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	Ms Mushfiqah Abrahams			mushfiqah.abrahams@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	Vernon Gibbs	P.O. Box 12 George 6530	044 803 1529	gibbs@edendm.co.za
Heritage Western Cape	Waseefa Dhansay	Private Bag X9067 Cape Town 8001	021 483 9543/9680	ceheritage@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

The Public Participation process will culminate in the compilation of a Comments and Responses Table: Comments and issues of concern contributed by I&APs will be listed, along with the I&APs name and means of communication. Comments will be responded to in the Comments and Responses Table.

5. SUMMARY OF IMPACT ASSESSMENT

The purpose of an EIA is to determine and evaluate the environmental impacts (both positive and negative) of a proposed project and its associated activities, to inform the decision-making at the project level. The EIA process is allowed for in Chapter 5 of the NEMA, to ensure that all environmental considerations are included in decisions regarding projects that may result in impacts on the environment. The process further promotes transparency and public involvement.

Heritage

A Notification of Intent to Develop was submitted to the Heritage Western Cape on 24 May 2021. The Heritage Western Cape subsequently issued a positive Record of Decision dated 19 December 2022 with Ref: HM / EDEN / MOSSEL BAY / ERF 21277, indicating that the proposed development may proceed and that no further Heritage related studies are required.

Jayson Orton, from ASHA Consulting (Pty) Ltd, conducted a Heritage Impact Assessment on 31 October 2022, HWC Case No.: 21051106SB0525E, together with his study a Palaeontological Impact Assessment and Visual Impact Assessment was conducted and brought to his attention. The following was obtained after numerous heritage resources and archaeological components were consulted. Based on his findings 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.

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.

Below is a summary of the palaeontological and visual impact that the proposed development might have in a heritage perspective.

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 subsurface of the proposed site is considered to be weathered consisting of soil, and possibly grey windblown cover sands in the majority of the proposed development site's places. This was a concerning factor regarding the construction of the foundation for the

proposed activity. 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 septic tanks and are not expected to exceed ~2 m depth.

Additionally the fossil content of the Silurian Skurweberg formation, fluvial braid-plain sandstone is sparse. Trace fossils are recorded from the finer-grained, muddier beds attributed to shallow marine or estuary 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 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:

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 minimize 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 colour 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.

BIOPHYSICAL ASSESSMENT

Terrestrial Vegetation

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 proposed site portion on Erf 21277 is located on the Southern Cape Coastal Plateau. The site occurs in a typical fynbos environment which were confirmed by the presence of fynbos species, such as *Aspalathus opaca*, *Metalsia acuta* and several *Herichrysum* species. The fynbos present on the site shows heavy disturbance by grazing and some alien infestation, notably *Acacia cyclops* (rooikrans) and *Cynodon dactylon*. Due to the disturbed nature of the site typical fynbos species such as *Ericas* and *Proteas* were however absent from 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 *Elytropappus rhinocerotis*, *Oedera genistifolia* and *Barleria pungenis*. 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.

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), with the addition of *Euphorbia procumbens* which has recently been dwindling in number. 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 (if development is allowed to proceed) these plants (*Hermannia lavandulifolia* (Vul), *Polygala pubiflora* (Vul) and *Ruellia pilosa* (Vul), and *Euphorbia procumbens* be searched and rescued and replanted in a suitable area nearby where it can be protected into perpetuity.



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 (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 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.

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 meters 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 meters 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 meters 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 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 meters), 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.

Biodiversity Impacts

Based on the Botanical Assessment the current land use as grazing paddock of horses had left the proposed site in a disturbed and degraded state. The site occurs in a typical fynbos environment, but due to continuous grazing and limited alien infestation the majority of the fynbos within the proposed development site has been damaged. As a result, the impact on vegetation type per se is of a low to moderate concern. The assessment also concluded that there were three vulnerable Species of Conservation Concern (*Hermannia lavandulifolia* (Vul), *Polygala pubiflora* (Vul) and *Ruellia pilosa* (Vul)) and another species (*Euphorbia procumbens*) that should be considered as important if the proposed activity is to be accepted. Essentially the main botanical and biodiversity impact referred to here will be the loss and damage of Three recorded Species of Conservation Concern namely *Hermannia lavandulifolia* (Vul), *Polygala pubiflora* (Vul) and *Ruellia pilosa* (Vul) and *Euphorbia procumbens* which has relatively low representing number.

Mitigation:

It is therefore recommended that (if development is allowed to proceed) these plants (*Hermannia lavandulifolia* (Vul), *Polygala pubiflora* (Vul) and *Ruellia pilosa* (Vul), and *Euphorbia procumbens*) be searched and rescued and replanted in a suitable area nearby where it can be protected into perpetuity.

Furthermore, 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.

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. 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.

Aquatic Impacts

An Aquatic Biodiversity Compliance Statement was conducted and 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. 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. It is therefore important to note that no aquatic resources were discovered on the concerned portion of Erf 21277 directly, but since the Channelled Valley-Bottom Wetland system is located within 500m of the proposed development site mitigation measures should be considered to limit negative impacts associated with the proposed activity.

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 meters 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 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.

Ideally the proposed mitigation measures should be implemented successfully to ensure that no aquatic ecosystem, natural or artificial be disturbed, damaged, or polluted in any form during the construction and operational phases, and that no watercourse be contaminated or excess sediment be distributed into said aquatic system.

Mitigation:

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.

Visual Intrusion Impacts

The Visual Impact Assessment considered a series of visual components that might suggest an effect that the proposed development might have on the surrounding environment. The assessment concluded that 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 Aalwyndal also lends towards a visually isolate Aalwyndal and partially screen views towards the proposed site from the surrounding scenic route other than the N2.

Tourism is considered an important factor to consider since the majority of the Mossel Bay area is dependent on tourism for economic stability and growth, Aalwyndal is not a major area associated with tourism other than the Mossel Bay Airfield and Guest Houses and farm accommodation offered in the area. The development 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.

They also stated that 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. Mitigation measure are also suggested and can be read below to ensure that the building structures fall within the considered aesthetic views of the surrounding area.

Therefore the only visual impact that should be highly considered is that of visual intrusion, allowing the integration of new developments into the existing character of Aalwyndal

Mitigation:

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 minimize 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 colour 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.

7. CONCLUSION AND RECOMMENDATION

It is the opinion of KAPPEC that the proposed development as discussed in the Basic Assessment Report will not result in unacceptable environmental impacts or risk and will contribute to positive socio-economic impacts. All the proposed mitigation measures included in the Specialist Reports have been included in the Environmental Management Programme and is supported.

In conclusion, KAPPEC is of the opinion that the proposed development as outlined in the Basic Assessment Report, and including the proposed mitigation measures should be issued an Environmental Authorization.

8. WAY FORWARD

This Executive Summary of the Draft Basic Assessment Report has been sent to all the identified IAPs. Individuals Interested and/or affected by the proposed activity are invited to register with Kapp Environmental Consultants (KAPPEC) as an Interested and Affected Party (I&AP). I&APs must provide their details including: Name, contact details, preferred method of correspondence (e.g. e-mail address or fax number) and an indication of any direct business, financial, personal or other interest which they have in the application to the contact person indicated below by latest the **27th of February 2023**. A copy of the Draft Basic Assessment Report will be made available on the KAPPEC website at www.kappec.co.za

For more information regarding the proposal, please contact: Mr. Renier Kapp, Kapp Environmental Consultants, (Cell): 082 675 5233, or E-mail: renier@kappec.co.za

Should you have any outstanding questions with regards to the above, please do not hesitate to contact me.

Yours sincerely



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For KAPPEC

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