

**BASIC ASSESSMENT REPORT  
IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107  
OF 1998) AND ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS  
AMENDED)**

**October 2017**

**PROJECT TITLE**

**The Proposed Agricultural Development, Napier Berries,  
Portion 3 of Farm 143, Vierfontein, Napier, Western Cape**

**NOVEMBER 2019**

<b>REPORT TYPE CATEGORY</b>	<b>REPORT REFERENCE NUMBER</b>	<b>DATE OF REPORT</b>
Pre-Application Basic Assessment Report (if applicable) <sup>1</sup>	16/3/3/6/7/1/E1/10/1322/19	June 2020
Draft Basic Assessment Report <sup>2</sup>		
Final Basic Assessment Report <sup>3</sup> or, if applicable Revised Basic Assessment Report <sup>4</sup> (strikethrough what is not applicable)		

**Notes:**

1. In terms of Regulation 40(3) potential or registered interested and affected parties, including the Competent Authority, may be provided with an opportunity to comment on the Basic Assessment Report prior to submission of the application but must again be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority. The Basic Assessment Report released for comment prior to submission of the application is referred to as the "Pre-Application Basic Assessment Report". The Basic Assessment Report made available for comment after submission of the application is referred to as the "Draft Basic Assessment Report". The Basic Assessment Report together with all the comments received on the report which is submitted to the Competent Authority for decision-making is referred to as the "Final Basic Assessment Report".
2. In terms of Regulation 19(1)(b) if significant changes have been made or significant new information has been added to the Draft Basic Assessment Report, which changes or information was not contained in the Draft Basic Assessment Report consulted on during the initial public participation process, then a Final Basic Assessment Report will not be submitted, but rather a "Revised Basic Assessment Report", which must be subjected to another public participation process of at least 30 days, must be submitted to the Competent Authority together with all the comments received.

**DEPARTMENTAL REFERENCE NUMBER(S)**

Pre-application reference number:	
File reference number (EIA):	
NEAS reference number (EIA):	
File reference number (Waste):	
NEAS reference number (Waste):	
File reference number (Air Quality):	
NEAS reference number (Air Quality):	
File reference number (Other):	
NEAS reference number (Other):	

## CONTENT AND GENERAL REQUIREMENTS

### Note that:

1. The content of the Department's Circular EADP 0028/2014 (dated 9 December 2014) on the "One Environmental Management System" and the Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended), any subsequent Circulars, and guidelines must be taken into account when completing this Basic Assessment Report Form.
2. This Basic Assessment Report is the standard report format which, in terms of Regulation 16(3) of the EIA Regulations, 2014 (as amended) must be used in all instances when preparing a Basic Assessment Report for Basic Assessment applications for an environmental authorisation in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the EIA Regulations, 2014 (as amended) and/or a waste management licence in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) ("NEM:WA"), and/or an atmospheric emission licence in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA") when the Western Cape Government: Environmental Affairs and Development Planning ("DEA&DP") is the Competent Authority/Licensing Authority.
3. This report form is current as of October 2017. It is the responsibility of the Applicant/ Environmental Assessment Practitioner ("EAP") to ascertain whether subsequent versions of the report form have been released by the Department. Visit the Department's website at <http://www.westerncape.gov.za/eadp> to check for the latest version of this checklist.
4. The required information must be typed within the spaces provided in the form. The size of the spaces provided is not necessarily indicative of the amount of information to be provided. The tables may be expanded where necessary.
5. The use of "not applicable" in the report must be done with circumspection. All applicable sections of this report form must be completed. Where "not applicable" is used, this may result in the refusal of the application.
6. While the different sections of the report form only provide space for provision of information related to one alternative, if more than one feasible and reasonable alternative is considered, the relevant section must be copied and completed for each alternative.
7. Unless protected by law, all information contained in, and attached to this report, will become public information on receipt by the competent authority. If information is not submitted with this report due to such information being protected by law, the applicant and/or EAP must declare such non-disclosure and provide the reasons for believing that the information is protected.
8. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this report 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.
9. This Report must be submitted to the Department and the contact details for doing so are provided below.
10. Where this Department is also identified as the Licensing Authority to decide applications under NEM:WA or 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: 021-483-2756 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 2798 and fax: 021 483 3254) at the same postal address as the Cape Town Office.

## DEPARTMENTAL DETAILS

CAPE TOWN OFFICE		GEORGE REGIONAL OFFICE
REGION 1 (City of Cape Town & West Coast District)	REGION 2 (Cape Winelands District & Overberg District)	REGION 3 (Central Karoo District & Eden District)
<p>Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1) Private Bag X 9086 Cape Town, 8000</p> <p>Registry Office 1<sup>st</sup> Floor Utilitas Building 1 Dorp Street, Cape Town</p> <p>Queries should be directed to the Directorate: Development Management (Region 1) at: Tel.: (021) 483-5829 Fax: (021) 483-4372</p>	<p>Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 2) Private Bag X 9086 Cape Town, 8000</p> <p>Registry Office 1<sup>st</sup> Floor Utilitas Building 1 Dorp Street, Cape Town</p> <p>Queries should be directed to the Directorate: Development Management (Region 2) at: Tel.: (021) 483-5842 Fax: (021) 483-3633</p>	<p>Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530</p> <p>Registry Office 4<sup>th</sup> Floor, York Park Building 93 York Street George</p> <p>Queries should be directed to the Directorate: Development Management (Region 3) at: Tel.: (044) 805-8600 Fax: (044) 805 8650</p>

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## ACRONYMS USED IN THIS BASIC ASSESSMENT REPORT AND APPENDICES:

BAR	Basic Assessment Report
CBA	Critical Biodiversity Area
DEA	National Department of Environmental Affairs
DEA&DP	Western Cape Government: Environmental Affairs and Development Planning
DWS	National Department of Water and Sanitation
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
ESA	Ecological Support Area
HWC	Heritage Western Cape
I&APs	Interested and Affected Parties
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
NEM:AQA	National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)
NEM:ICMA	National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008)
NEM:WA	National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)
NHRA	National Heritage Resources Act, 1999 (Act No. 25 of 1999)
PPP	Public Participation Process

## DETAILS OF THE APPLICANT

Applicant / Organisation / Organ of State:	Napier Berries (Pty) Ltd		
Contact person:	Jan Gutter		
Postal address:	P.O. Box 29713		
Telephone:	051 407 6600	Postal Code:	9301
Cellular:	082 652 3230	Fax:	021 421 0510
E-mail:	jannie@4am.co.za		

## DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

Name of the EAP organisation:	EnviroAfrica cc		
Person who compiled this Report:	Clinton Geyser		
EAP Reg. No.:			
Contact Person (if not author):			
Postal address:	P. O. Box 5367, Helderberg		
Telephone:	(021) 8511616	Postal Code:	7446
Cellular:		Fax:	086 512 0154
E-mail:	clinton@enviroafrica.co.za		
EAP Qualifications:	<u>Clinton Geyser</u> : BSc; BSc (Hons); MSc. Environmental Management <u>Bernard de Witt</u> : B.Sc. Forestry (Stellenbosch); B.A. (Hons) Public Administration (Stellenbosch); National Diploma in Parks and Recreation Management; EIA Short course (UCT); ISO 14001 Auditors course (SABS)		

Please provide details of the lead EAP, including details on the expertise of the lead EAP responsible for the Basic Assessment process. Also attach his/her Curriculum Vitae to this BAR.

This Post-Application Basic Assessment Report was prepared by Clinton Geyser who has a MSc. Degree in Environmental Management. He has been working as an Environmental Assessment Practitioner since 2009 and is currently employed at EnviroAfrica CC.

Report compiled by Clinton Geyser -

Qualifications:

- BSc. Earth Sciences, Majors in Geology and Geography and Environmental Management (1998 – 2000) and;
- BSc. (hons): Geography and Environmental Management (2001) and;
- MSc. Geography and Environmental Management (2002), all from the University of Johannesburg.

Expertise:

Clinton Geyser has over ten years' experience in the environmental management field as an Environmental Assessment Practitioner and as an Environmental Control Officer, having worked on a variety of projects in the Western, Eastern and Northern Cape. Previous completed applications include, but not limited to:

- Civil engineering infrastructure including pipelines, Waste Water Treatment Works, and roads in the Western and Northern Cape.
- Agricultural developments, reservoirs and dams, in the Western and Northern Cape.
- Telecommunications masts in the Western and Eastern Cape
- Housing Developments in the Western and Northern Cape.
- Resort developments in the Western and Northern Cape.
- Cemeteries in the Western Cape
- Waste Management Licences in the Western Cape

**Employment:**

Previous employment as an EAP: Doug Jeffery Environmental Consultants (2009 – 2012)

Current employment: EnviroAfrica cc (2012 – present).

The whole process and report was supervised by Bernard de Witt who has more than 20 years' experience in environmental management and environmental impact assessments.

## **EXECUTIVE SUMMARY OF THE BASIC ASSESSMENT REPORT:**

### Introduction

It is proposed that approximately 19.5ha of vegetation be removed for the establishment of blueberry crops on Portion 3 of Farm 143, Vierfontein, Napier, Western Cape

An area of approximately 43ha has been identified on the farm and assessed, however, only approximately 19.5ha will be developed for the establishment of blueberries. The plants will be planted in plastic pots which will be placed on weed mat with windbreaks every 50m. Each pot will get 4 drippers through which each plant gets its water and fertilizer.

- 6000plants/ha
- Total plants = 114 000 plants on the 19ha
- Pots are 25liters
- Pots are placed in row of 65m long and 2.3m apart

A pump station in the middle of the area is proposed from where all the blocks are fertilized with a continuous fertigation system.

### Environmental Requirements

The National Environmental Management Act (NEMA, Act 107 of 1998), as amended, makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the competent authority based on the findings of an Environmental Assessment. NEMA is a national act, which is enforced by the Department of Environmental Affairs (DEA). In the Western Cape, these powers are delegated to the Department of Environmental Affairs & Development Planning (DEA&DP). According to the regulations of Section 24(5) of NEMA, authorisation is required for the following:

#### Government Notice R327 (Listing Notice 1):

Activity no. 27: The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for;

- (i) the undertaking of a linear activity; or
- (ii) maintenance purposes undertaken in accordance with a maintenance management plan.

#### Government Notice R324 (Listing Notice 3):

Activity no. 12: The clearance of an area of 300m<sup>2</sup> or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.

##### (i) Western Cape:

- (i) within any critically endangered or endangered ecosystems listed in terms of section 53 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered on the National Spatial Biodiversity Assessment 2004.

### Site Description

The site is generally undisturbed, with no evidence of agricultural activities, including ploughing or livestock, taking place on the site. The site is near natural, with only the existing two-track farm roads through the site. The site is however, invaded by alien vegetation, with the level of infestation varying across the site.

The proposed site supports a single vegetation type namely Overberg Sandstone Fynbos, which is listed as Critically Endangered.

Approximately 44% of the site consists of intact fynbos but with scattered alien invasive trees and shrubs, and approximately 55% are areas with dense infestation of alien trees and shrubs, mid-dense cover of alien invasive plants, and areas cleared of alien plants but which are rapidly and aggressively recolonizing the area.

According to the Freshwater Verification (**Appendix G2**), there are no watercourses within the proposed site. The nearest watercourse is the Klipdrif River, located approximately 230m to the west of the site.

The Klipdrif River flows in a northerly direction. The active channel consists of a cobble bed, while the riparian marginal vegetation is dominated by large tree species. The river embankment is steep, as it is situated in a valley, named the Vlermuiskelderkloof.

According to the Heritage Notice of Intent to Develop, the area straddles the uppermost two formations of the Table Mountain Group, viz. the Skurweberg and Rietvlei formations, of LOW/BUE and HIGH/ORANGE palaeosensitivities, respectively (SAHRIS Palaeomap). Although this interval of strata is fossiliferous, the rich fossil content occurs further north where deformation of the Cape Fold Belt is less intense. These strata in the south are not distinguished by well-preserved fossil content. Furthermore, deep weathering during the Cenozoic has degraded the fossils in the subsurface. Due to deformation and weathering the fossil potential/sensitivity is low. The surficial disturbance of the weathered soils by agricultural activity is unlikely to impact upon palaeontological resources.

There is a possibility of a few stone tools of low archaeological significance. Impacts on heritage resources is likely to be very low.

### Water

Water for irrigation will be sourced from the existing farm dam and water allocation, and the majority of the main irrigation lines are already developed, with only the sub lines for irrigation needing to be constructed.

### Access

Access will be gained from existing internal farm roads.

### Conclusion

The proposed development is needed as according to the Applicant, the farm has no commercial operation, therefore not a sustainable production unit and with available water source from the Vierfontein dam, access to a sustainable farming solution, an opportunity exists where a small portion of the farm can be used to create a sustainable business that will create much needed jobs and the opportunity to manage aliens on the rest of the farm.

The proposed development would result in loss of approximately 19.5 ha of vegetation within Critically Endangered Overberg Sandstone Fynbos. According to the Botanical Impact Assessment (**Appendix G1**), the loss of 19.5 ha of Overberg Sandstone Fynbos on the northern slopes of the Soetmuisberg would be negative wherever it occurred, particularly in view of having found an undescribed no-doubt endemic species of *Serruria* and the likelihood of more endemic species present. On balance, however, development of the northern 20 ha is acceptable if mitigation measures are applied.

The recommended mitigation is that the alien invasive plant species, *Pinus radiata*\*, *Leptospermum laevigatum*\*, *Acacia longifolia*\*, *Acacia saligna*\* and *Hakea sericea*\* should be systematically cleared and removed from the entire part of Portion 3 of Vierfontein 143 i.e. the southern part of the study area and beyond to the higher altitude parts of Portion 3.

The mitigation described above would compensate for the loss of the 20 ha of degraded fynbos in the northern part of the study area and would contribute positively to the efforts of the Napier Mountain Conservancy aimed at eradicating the alien vegetation in the catchments of the Groot Sanddrif River.

The proposed development is unlikely to impact significantly on freshwater resources.

The proposed development is expected to have a very low likelihood of negatively impacting on significant archaeological or palaeontological heritage aspects.

Due to the nature of the development, the site and the surrounding land-uses, the proposed development is expected to have a low negative impact on the visual character of the area.

The proposed development is expected to create an additional 80 job opportunities during the development phase, and approximately 25 additional job opportunities during the operational phase, 90% of which will go to previously disadvantaged individuals.

**Considering all the information, it is not envisaged that this proposed development will have a significant negative impact on the environment, besides the removal of 19.5ha of Overberg Sandstone Fynbos which is considered acceptable if mitigation measures are applied.**

**It is therefore recommended that this application be authorised with the necessary conditions of approval as described throughout this BAR.**



## SECTION A: PROJECT INFORMATION

### 1. ACTIVITY LOCATION

Location of all proposed sites:	The site is located on Portion 3 Farm 143, Vierfontein, Napier, Western Cape
Farm / Erf name(s) and number(s) (including Portions thereof) for each proposed site:	Portion 3 Farm 143, Vierfontein, Napier, Western Cape
Property size(s) in m <sup>2</sup> for each proposed site:	476.03 hectares
Development footprint size(s) in m <sup>2</sup> :	~19.5ha
Surveyor General (SG) 21 digit code for each proposed site:	C01100000000014300003

### 2. PROJECT DESCRIPTION

(a) Is the project a new development? If "NO", explain:

YES

NO

The project is the removal of approximately 19.5ha of vegetation for the development of new blueberry crops.

(b) Provide a detailed description of the scope of the proposed development (project).

It is proposed that approximately 19.5ha of vegetation be removed for the establishment of blueberry crops on Portion 3 of Farm 143, Vierfontein, Napier, Western Cape

An area of approximately 43ha has been identified on the farm and assessed, however, only approximately 19.5ha will be developed for the establishment of blueberries. The plants will be planted in plastic pots which will be placed on weed mat with windbreaks every 50m. Each pot will get 4 drippers through which each plant gets its water and fertilizer.

- 6000plants/ha
- Total plants = 114 000 plants on the 19ha
- Pots are 25liters
- Pots are placed in row of 65m long and 2.3m apart

A pump station in the middle of the area is proposed from where all the blocks are fertilized with a continuous fertigation system.

The development will include shade net windbreaks with open roofs (with the option of enclosing with shade netting or plastic in future if the need arises).

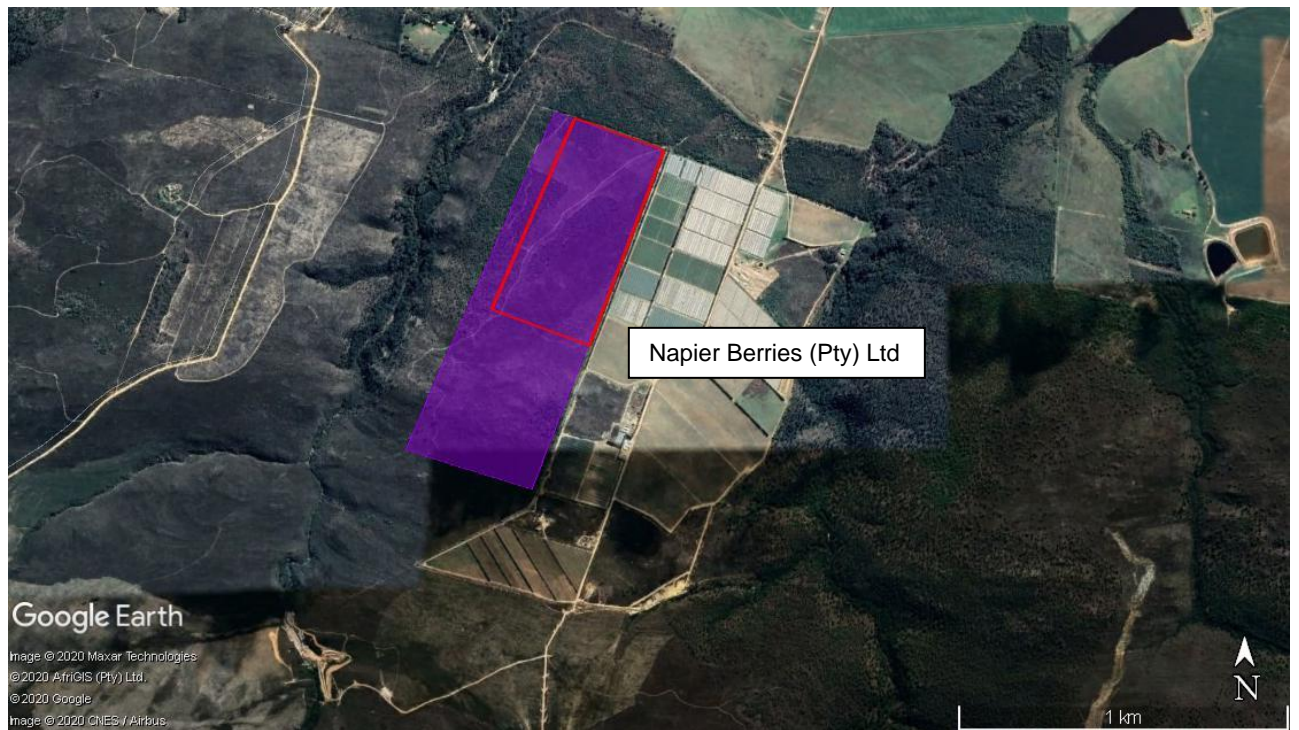


Figure 1: Google Earth image of the proposed site. The red polygon indicates the preferred proposed development area, adjacent to the existing Napier Berries development. The purple polygon indicates the area considered for possible development (43ha).

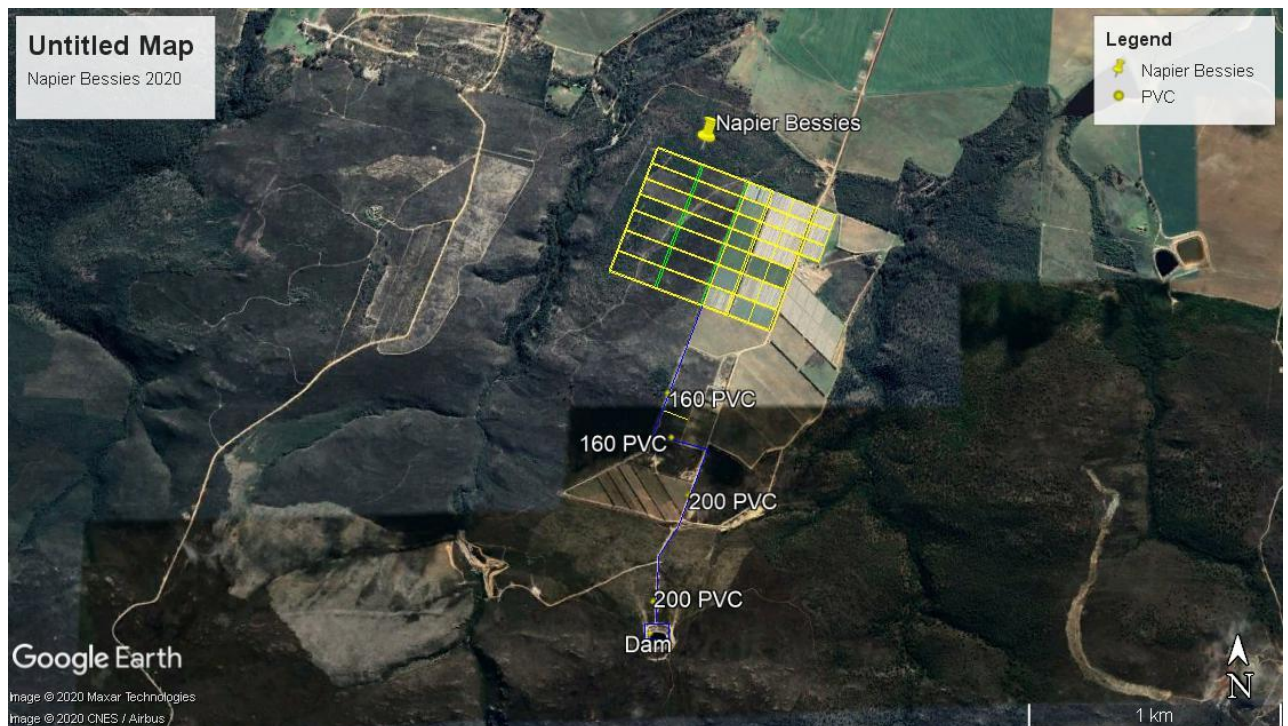


Figure 2: Google Earth image of the proposed irrigation system (in yellow) to be constructed

Water for irrigation will be sourced from the existing farm dam and water allocation, and the majority of the main irrigation lines are already developed, with only the sub lines (160mm pvc) for irrigation to the new proposed blocks needing to be installed.

**Please note:** This description must relate to the listed and specified activities in paragraph (d) below.

(c) Please indicate the following periods that are recommended for inclusion in the environmental authorisation:

(i)	the period within which commencement must occur,	5 years
(ii)	the period for which the environmental authorisation should be granted and the date by which the activity must have been concluded, where the environmental authorisation does not include operational aspects;	N/A
(iii)	the period that should be granted for the non-operational aspects of the environmental authorisation; and	N/A
(iv)	the period that should be granted for the operational aspects of the environmental authorisation.	Indefinite (permanent development)

**Please note:** The Department must specify the abovementioned periods, where applicable, in an environmental authorisation. In terms of the period within which commencement must occur, the period must not exceed 10 years and must not be extended beyond such 10 year period, unless the process to amend the environmental authorisation contemplated in regulation 32 is followed.

(d) List all the listed activities triggered and being applied for.

**Please note:** The onus is on the applicant to ensure that all the applicable listed activities are applied for and assessed as part of the EIA process. Please refer to paragraph (b) above.

**EIA Regulations Listing Notices 1 and 3 of 2014 (as amended):**

Listed Activity No(s):	Describe the relevant Basic Assessment Activity(ies) in writing as per Listing Notice 1 (GN No. R. 327)	Describe the portion of the development that relates to the applicable listed activity as per the project description.	Identify if the activity is development / development and operational / decommissioning / expansion / expansion and operational.
27	The <b>clearance of an area</b> of 1 hectares or more, but less than 20 hectares of <b>indigenous vegetation</b> , except where such clearance of indigenous vegetation is required for;  (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.	More than 1ha of indigenous vegetation is to be cleared to develop 19.5ha of blueberry crops	Development and operation
Listed Activity No(s):	Describe the relevant Basic Assessment Activity(ies) in writing as per Listing Notice 3 (GN No. R. 324)	Describe the portion of the development that relates to the applicable listed activity as per the project description.	Identify if the activity is development / development and operational / decommissioning / expansion / expansion and operational.
12	The clearance of an area of 300m <sup>2</sup> or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. (i) Western Cape: (i) within any critically endangered or endangered ecosystems listed in terms of section 53 of the NEMBA or	More than 300m <sup>2</sup> of indigenous vegetation is to be cleared to develop 19.5ha of blueberry crops. The site is located within vegetation listed as critically endangered.	Development and operation

	prior to the publication of such a list, within an area that has been identified as critically endangered on the National Spatial Biodiversity Assessment 2004.		
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**Waste management activities** in terms of the NEM: WA (GN No. 921):

Category A Listed Activity No(s):	Describe the relevant <u>Category A</u> waste management activity in writing as per GN No. 921	Describe the portion of the development that relates to the applicable listed activity as per the project description
	N/A	

**Note:** If any waste management activities are applicable, the **Listed Waste Management Activities Additional Information Annexure** must be completed and attached to this Basic Assessment Report as **Appendix I**.

**Atmospheric emission activities** in terms of the NEM: AQA (GN No. 893):

Listed Activity No(s):	Describe the relevant atmospheric emission activity in writing as per GN No. 893	Describe the portion of the development that relates to the applicable listed activity as per the project description.
	N/A	

- (e) Provide details of all components (including associated structures and infrastructure) of the proposed development and attach diagrams (e.g., architectural drawings or perspectives, engineering drawings, process flowcharts, etc.).

Buildings Provide brief description below:	YES	NO
No buildings are proposed		
Infrastructure (e.g., roads, power and water supply/ storage) Provide brief description below:	YES	NO
<p>The plants will be planted in plastic pots which will be placed on weed mat with windbreaks every 50m. Each pot will get 4 drippers through which each plant gets its water and fertilizer.</p> <ul style="list-style-type: none"> <li>• 6000plants/ha</li> <li>• Total plants = 114 000 plants on the 19ha</li> <li>• Pots are 25liters</li> <li>• Pots are placed in row of 65m long and 2.3m apart</li> </ul> <p>A pump station in the middle of the area is proposed from where all the blocks are fertilized with a continuous fertigation system.</p> <p>The development will include shade net windbreaks with open roofs (with the option of enclosing with shade netting or plastic in future if the need arises).</p> <p>Water for irrigation will be sourced from the existing farm dam and water allocation, and the majority of the main irrigation lines are already developed, with only the sub lines (160mm pvc) for irrigation to the new proposed blocks needing to be installed.</p>		
Processing activities (e.g., manufacturing, storage, distribution) Provide brief description below:	YES	NO
N/A		
Storage facilities for raw materials and products (e.g., volume and substances to be stored) Provide brief description below:	YES	NO
N/A		
Storage and treatment facilities for effluent, wastewater or sewage: Provide brief description below:	YES	NO

N/A		
Storage and treatment of solid waste Provide brief description below:	YES	NO
N/A		
Facilities associated with the release of emissions or pollution. Provide brief description below:	YES	NO
N/A		
Other activities (e.g., water abstraction activities, crop planting activities) – Provide brief description below:	YES	NO
Water for irrigation will be sourced from the existing farm dam and water allocation, and the majority of the main irrigation lines are already developed, with only the sub lines (160mm pvc) for irrigation to the new proposed blocks needing to be installed. See Figure 2		

### 3. PHYSICAL SIZE OF THE PROPOSED DEVELOPMENT

(a) Property size(s): Indicate the size of all the properties (cadastral units) on which the development proposal is to be undertaken	4 760 000 (476ha)	m <sup>2</sup>
(b) Size of the facility: Indicate the size of the facility where the development proposal is to be undertaken	N/A	m <sup>2</sup>
(c) Development footprint: Indicate the area that will be physically altered as a result of undertaking any development proposal (i.e., the physical size of the development together with all its associated structures and infrastructure)	~195 000	m <sup>2</sup>
(d) Size of the activity: Indicate the physical size (footprint) of the development proposal	~195 000	m <sup>2</sup>
(e) For linear development proposals: Indicate the length (L) and width (W) of the development proposal	{L}	m
	{W}	m
(f) For storage facilities: Indicate the volume of the storage facility	N/A	m <sup>3</sup>
(g) For sewage/effluent treatment facilities: Indicate the volume of the facility (Note: the maximum design capacity must be indicated)	N/A	m <sup>3</sup>

### 4. SITE ACCESS

(a) Is there an existing access road?	YES	NO
(b) If no, what is the distance in (m) over which a new access road will be built?	m	

(c) Describe the type of access road planned:

N/A. Existing internal farm roads will be used

**Please note:** The position of the proposed access road must be indicated on the site plan.



## 5. DESCRIPTION OF THE PROPERTY(IES) ON WHICH THE LISTED ACTIVITY(IES) ARE TO BE UNDERTAKEN AND THE LOCATION OF THE LISTED ACTIVITY(IES) ON THE PROPERTY

- 5.1 Provide a description of the property on which the listed activity(ies) is/are to be undertaken and the location of the listed activity(ies) on the property, as well as of all alternative properties and locations (duplicate section below as required).

The property (Portion 3 of Farm 143, Vierfontein) is currently undeveloped. The property is approximately 476ha, with only about 19.5ha being developed in the north-east corner of the property. The site is located directly adjacent to Portion 4 of 143, which is currently operated by the Applicant.

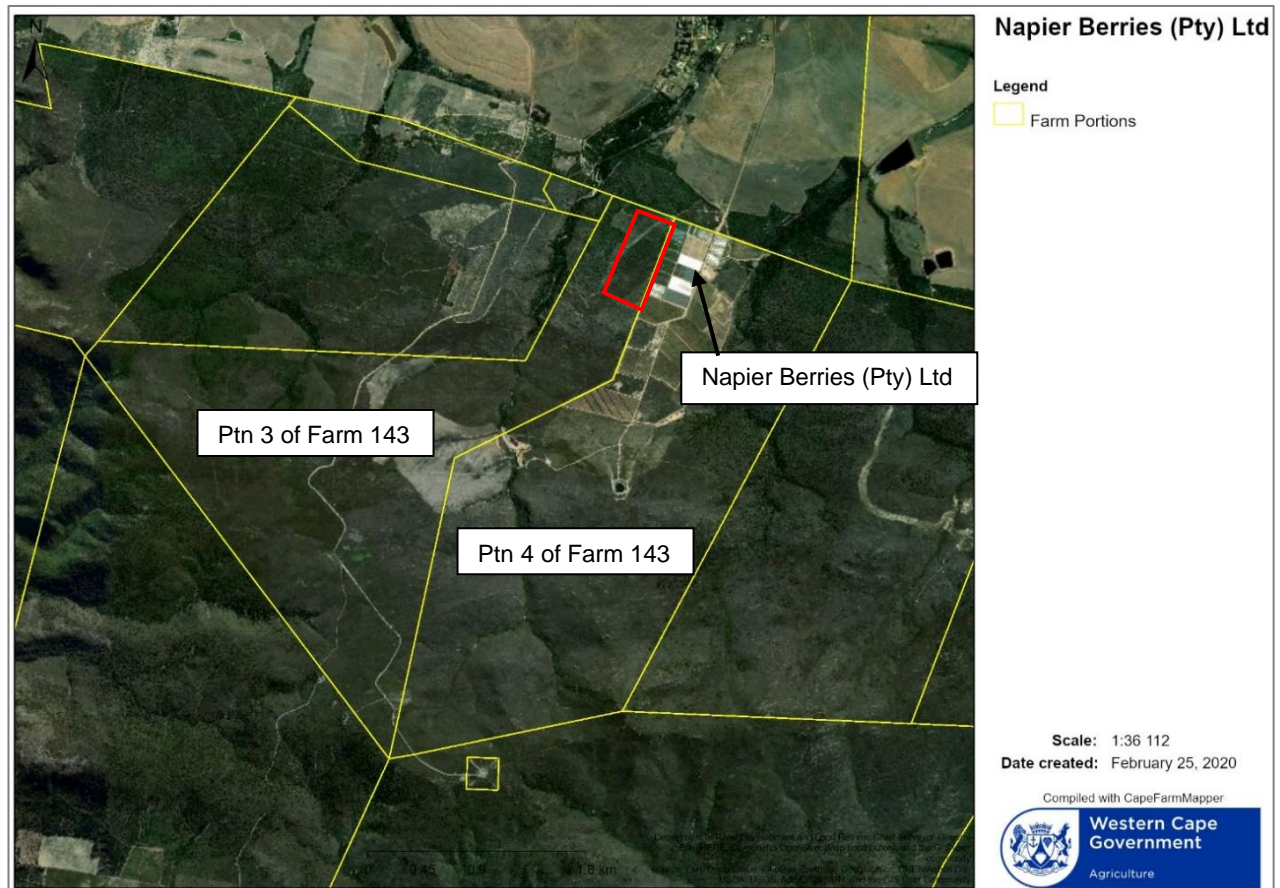


Figure 3: CapeFarmMapper image showing the farm, and the proposed site (red polygon) in relation to the property.

Coordinates of all the proposed activities on the property or properties (sites):	Latitude (S): (deg.; min.; sec)			Longitude (E): (deg.; min.; sec.)		
	34 °	29 '	43.50"	19°	54'	23.00"
	°	'	"	°	'	"
	°	'	"	°	'	"
	°	'	"	°	'	"

**Note:** For land where the property has not been defined, the coordinates of the area within which the development is proposed must be provided in an addendum to this report.

- 5.2 Provide a description of the area where the aquatic or ocean-based activity(ies) is/are to be undertaken and the location of the activity(ies) and alternative sites (if applicable).

N/A

Coordinates of the boundary /perimeter of all proposed aquatic or ocean-based activities (sites) (if applicable):	Latitude (S): (deg.; min.; sec)			Longitude (E): (deg.; min.; sec)		
	°	'	"	°	'	"
	°	'	"	°	'	"
	°	'	"	°	'	"
	°	'	"	°	'	"

- 5.3 For a linear development proposal, please provide a description and coordinates of the corridor in which the proposed development will be undertaken (if applicable).

N/A
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For linear activities:	Latitude (S): (deg.; min.; sec)			Longitude (E): (deg.; min.; sec)		
• Starting point of the activity	°	'	"	°	'	"
• Middle point of the activity	°	'	"	°	'	"
• End point of the activity	°	'	"	°	'	"

**Note:** For linear development proposals longer than 1000m, please provide an addendum with co-ordinates taken every 250m along the route. All important waypoints must be indicated and the GIS shape file provided digitally.

- 5.4 Provide a location map (see below) as **Appendix A** to this report that shows the location of the proposed development and associated structures and infrastructure on the property; as well as a detailed site development plan / site map (see below) as **Appendix B** to this report; and if applicable, all alternative properties and locations. The GIS shape files (.shp) for maps / site development plans must be included in the electronic copy of the report submitted to the competent authority.

Locality Map:	<p>The scale of the locality map must be at least 1:50 000. For linear development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following:</p> <ul style="list-style-type: none"> <li>• an accurate indication of the project site position as well as the positions of the alternative sites, if any;</li> <li>• road names or numbers of all the major roads as well as the roads that provide access to the site(s)</li> <li>• a north arrow;</li> <li>• a legend;</li> <li>• a linear scale;</li> <li>• the prevailing wind direction (during November to April and during May to October); and</li> <li>• GPS co-ordinates (to indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates should be in degrees and decimal minutes. The minutes should have at least three decimals to ensure adequate accuracy. The projection that must be used in all cases is the WGS84 spheroid in a national or local projection).</li> </ul> <p>For an ocean-based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken.</p> <p>Coordinates must be provided in degrees, minutes and seconds using the Hartebeesthoek94; WGS84 co-ordinate system.</p>
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Site Plan:	<p>Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following:</p> <ul style="list-style-type: none"> <li>• The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be indicated on the plan, preferably together with a linear scale.</li> <li>• The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan.</li> <li>• The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be indicated on the site plan.</li> <li>• The position of each element of the application as well as any other structures on the site must be indicated on the site plan.</li> <li>• Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the development <u>must</u> be indicated on the site plan.</li> <li>• Servitudes and an indication of the purpose of each servitude must be indicated on the site plan.</li> <li>• Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): <ul style="list-style-type: none"> <li>◦ Watercourses / Rivers / Wetlands - including the 32 meter set back line from the edge of the bank of a river/stream/wetland;</li> <li>◦ Flood lines (i.e., 1:100 year, 1:50 year and 1:10 year where applicable);</li> <li>◦ Ridges;</li> <li>◦ Cultural and historical features;</li> <li>◦ Areas with indigenous vegetation (even if degraded or infested with alien species).</li> </ul> </li> <li>• Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted.</li> <li>• North arrow</li> </ul>
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	<p>A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.</p> <p>The GIS shape file for the site development plan(s) must be submitted digitally.</p>
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## 6. SITE PHOTOGRAPHS

Colour photographs 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 as **Appendix C** to this report. 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.



## SECTION B: DESCRIPTION OF THE RECEIVING ENVIRONMENT

### Site/Area Description

For linear development proposals (pipelines, etc.) as well as development proposals that cover very large sites, it may be necessary to complete copies of this section for each part of the site that has a significantly different environment. In such cases please complete copies of Section B and indicate the area that is covered by each copy on the Site Plan.

#### 1. GRADIENT OF THE SITE

Indicate the general gradient of the sites (highlight the appropriate box).

Flat	Flatter than 1:10	1:10—1:4	Steeper than 1:4
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#### 2. LOCATION IN LANDSCAPE

(a) Indicate the landform(s) that best describes the site (highlight the appropriate box(es)).

Ridgeline	Plateau	Side slope of hill / mountain	Closed valley	Open valley	Plain	Undulating plain/low hills	Dune	Sea-front
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(b) Provide a description of the location in the landscape.

The proposed site is located on a hillside, near the foot of the Soetmuisberg.

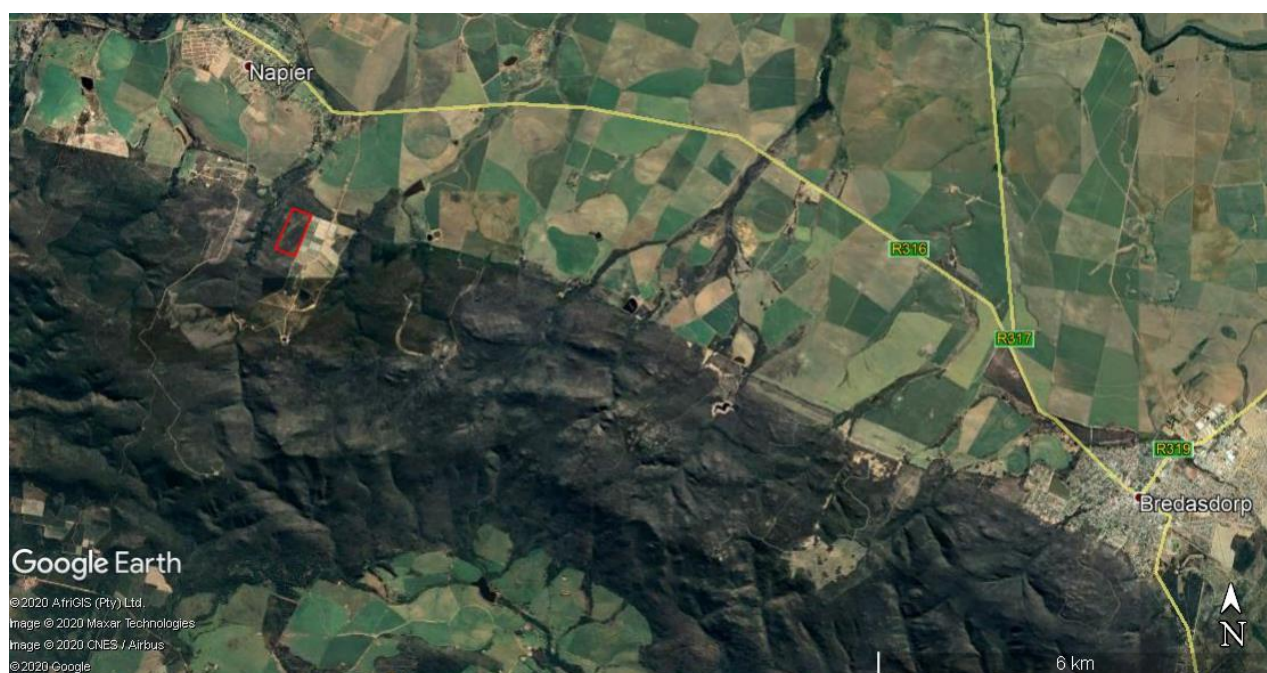


Figure 4: Google Earth image of the proposed site (indicated by the red polygon) in relation to the landscape.

#### 3. GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE

(a) Is the site(s) located on or near any of the following (highlight the appropriate boxes)?

Shallow water table (less than 1.5m deep)	YES	NO	UNSURE
Seasonally wet soils (often close to water bodies)	YES	NO	UNSURE
Unstable rocky slopes or steep slopes with loose soil	YES	NO	UNSURE
Dispersive soils (soils that dissolve in water)	YES	NO	UNSURE
Soils with high clay content	YES	NO	UNSURE
Any other unstable soil or geological feature	YES	NO	UNSURE

An area sensitive to erosion	YES	NO	UNSURE
An area adjacent to or above an aquifer.	YES	NO	UNSURE
An area within 100m of a source of surface water	YES	NO	UNSURE
An area within 500m of a wetland	YES	NO	UNSURE
An area within the 1:50 year flood zone	YES	NO	UNSURE
A water source subject to tidal influence	YES	NO	UNSURE

- (b) If any of the answers to the above is "YES" or "UNSURE", specialist input may be requested by the Department.  
(Information in respect of the above will often be available at the planning sections of local authorities. The 1:50 000 scale Regional Geotechnical Maps prepared by Geological Survey may also be used).

- (c) Indicate the type of geological formation underlying the site.

Granite	Shale	Sandstone	Quartzite	Dolomite	Dolerite	Other (describe)
Provide a description.						
<p>According to CapeFarmMapper, the soils consists of rocky areas with limited, miscellaneous soils. The Geology consists of Quartzitic sandstone and subordinate shale of the Table Mountain Group.</p> <p>According to the Botanical Impact Assessment (<b>Appendix G1</b>), the entire site lies on sandstone sediments of the Nardouw Subgroup of the Table Mountain Group. The orthoquartzitic sandstones have over millennia given rise to well-drained, leached and consequently nutrient-poor (oligotrophic) soils. No clay-rich soils derived from shale are found anywhere on the site.</p>						

#### 4. SURFACE WATER

- (a) Indicate the surface water present on and or adjacent to the site and alternative sites (highlight the appropriate boxes)?

Perennial River	YES	NO	UNSURE
Non-Perennial River	YES	NO	UNSURE
Permanent Wetland	YES	NO	UNSURE
Seasonal Wetland	YES	NO	UNSURE
Artificial Wetland	YES	NO	UNSURE
Estuarine / Lagoon	YES	NO	UNSURE

- (b) Provide a description.

According to the Freshwater Verification (**Appendix G2**), there are no watercourses within the proposed site. The nearest watercourse is the Klipdrif River, located approximately 230m to the west of the site. The Klipdrif River flows in a northerly direction. The active channel consists of a cobble bed, while the riparian marginal vegetation is dominated by large tree species. The river embankment is steep, as it is situated in a valley, named the Vlermuiskelderkloof. Surface water within the active channel was flowing despite the field assessment undertaken in the drier summer period.

Although the NFEPA database (2011) classified the Klipdrif River as a natural seep wetland (see Figure 3 below), it can be classified as a riparian watercourse as defined by the National Water Act, 1998 (Act No. 36 of 1998).

According to the Freshwater Verification (**Appendix G2**), the river is considered to be in a good ecological condition. The only significant impact evident on site was the invasion of alien tree species, however these species aid with the prevention of erosion considering the steep embankments of the valley and river. Additionally, considering that the reach of the river verified during the site assessment is located in the headwaters of the drainage network and the limited upstream land use transformation, the water quality of the river is considered to be good.

The Groot Sand River is located approximately 740m east of the site.

The freshwater verification (**Appendix G2**) concluded that as the proposed development is located approximately 230m east of the identified watercourse (the Klipdrif River) and not within any associated legislative regulated zones, no further authorisation from a freshwater ecological perspective is required for the proposed development.

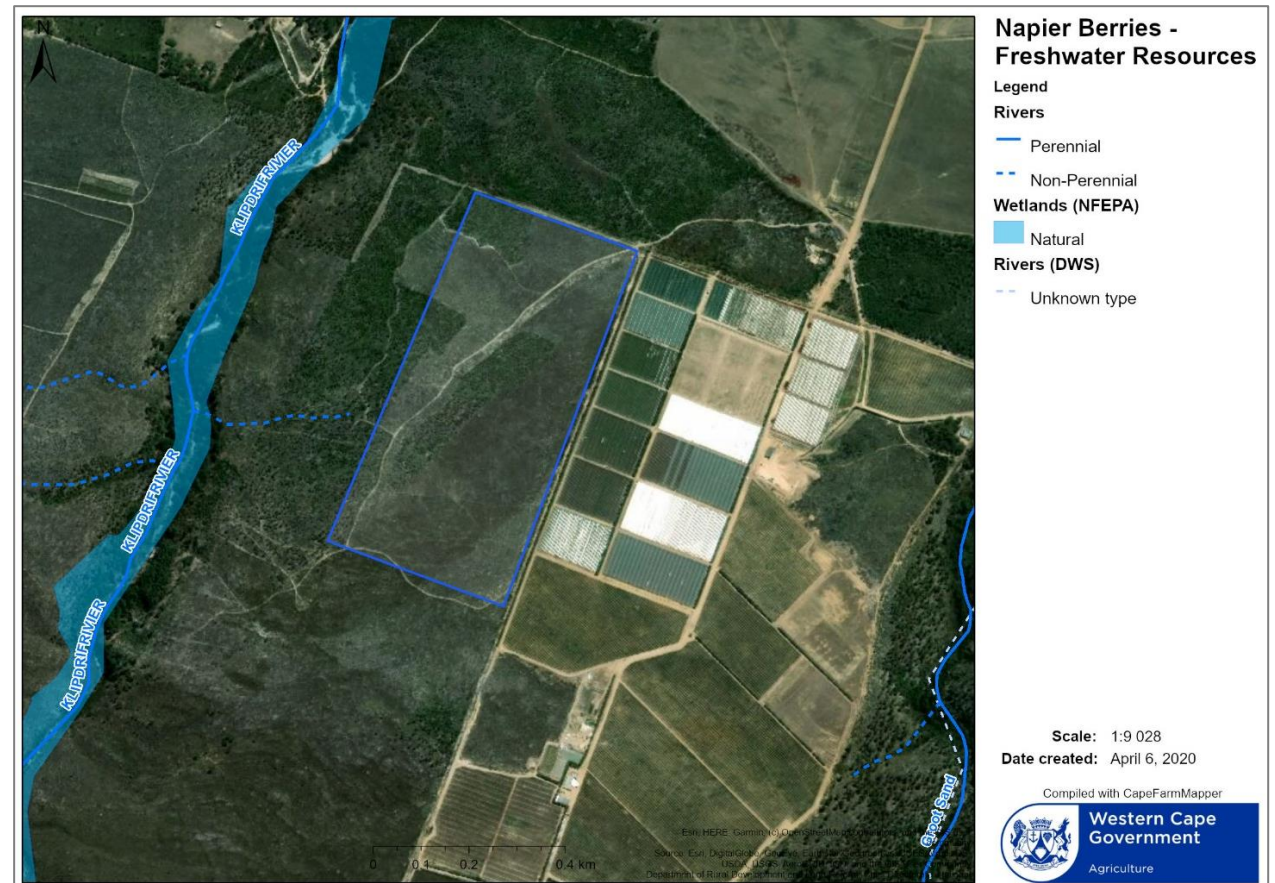
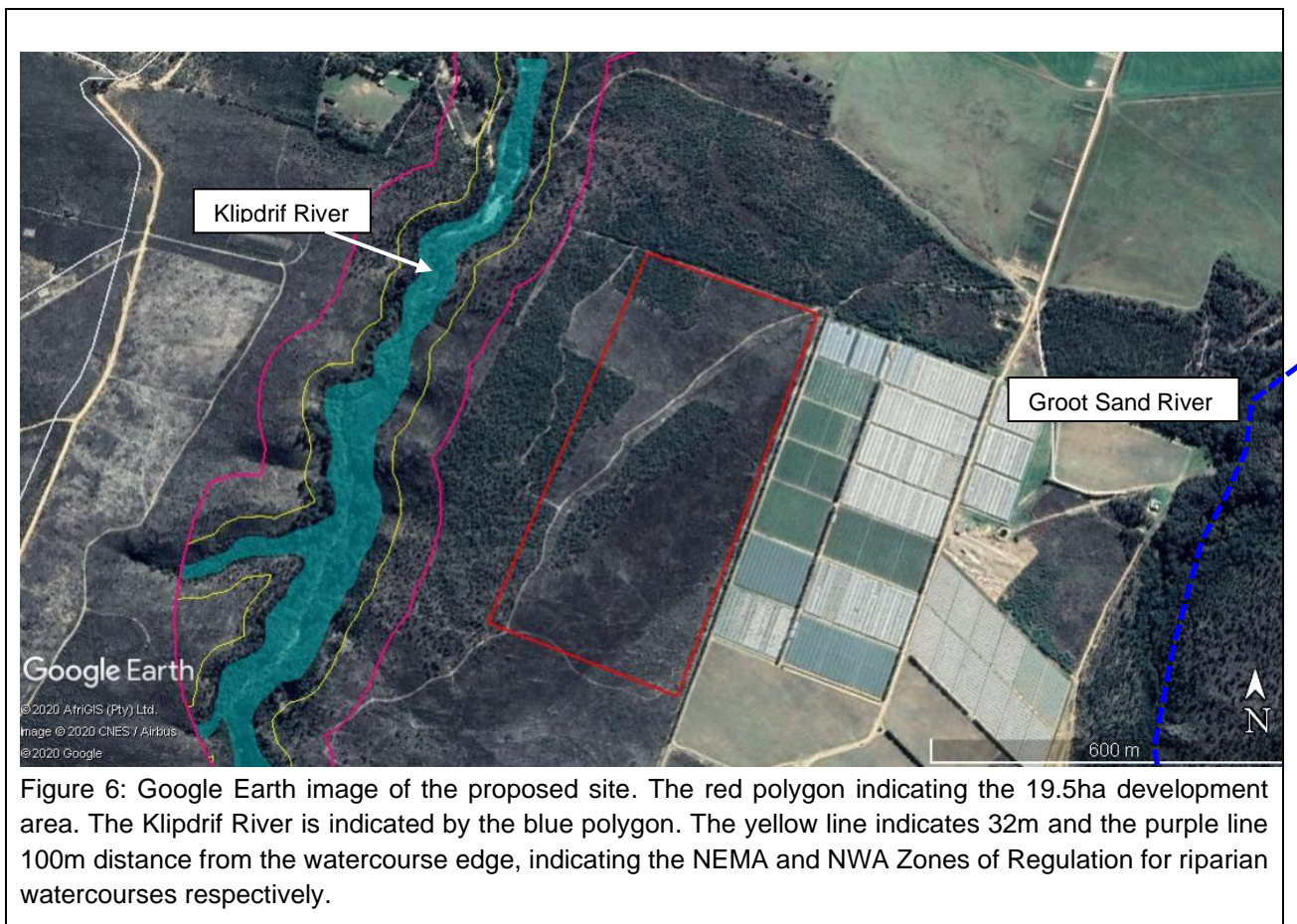


Figure 5: CapeFarmMapper Freshwater resources





## 5. THE SEAFRONT / SEA

- (a) Is the site(s) located within any of the following areas? (highlight the appropriate boxes).  
If the site or alternative site is closer than 100m to such an area, please provide the approximate distance in (m).

AREA	YES	NO	UNSURE	If "YES": Distance to nearest area (m)
An area within 100m of the high water mark of the sea	YES	NO	UNSURE	
An area within 100m of the high water mark of an estuary/lagoon	YES	NO	UNSURE	
An area within the littoral active zone	YES	NO	UNSURE	
An area in the coastal public property	YES	NO	UNSURE	
Major anthropogenic structures	YES	NO	UNSURE	
An area within a Coastal Protection Zone	YES	NO	UNSURE	
An area seaward of the coastal management line	YES	NO	UNSURE	
An area within the high risk zone (20 years)	YES	NO	UNSURE	
An area within the medium risk zone (50 years)	YES	NO	UNSURE	
An area within the low risk zone (100 years)	YES	NO	UNSURE	
An area below the 5m contour	YES	NO	UNSURE	
An area within 1km from the high water mark of the sea	YES	NO	UNSURE	
A rocky beach	YES	NO	UNSURE	
A sandy beach	YES	NO	UNSURE	

- (b) If any of the answers to the above is "YES" or "UNSURE", specialist input may be requested by the Department. (The 1:50 000 scale Regional Geotechnical Maps prepared by Geological Survey may also be used).

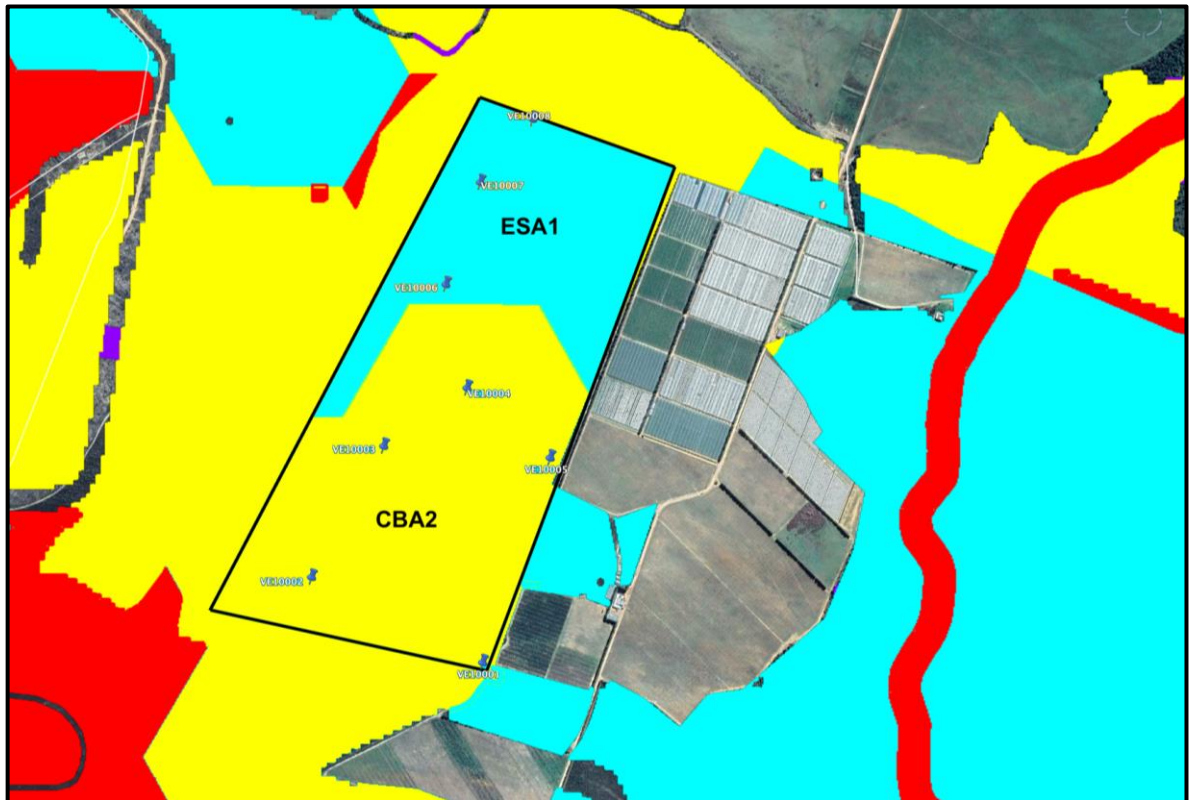
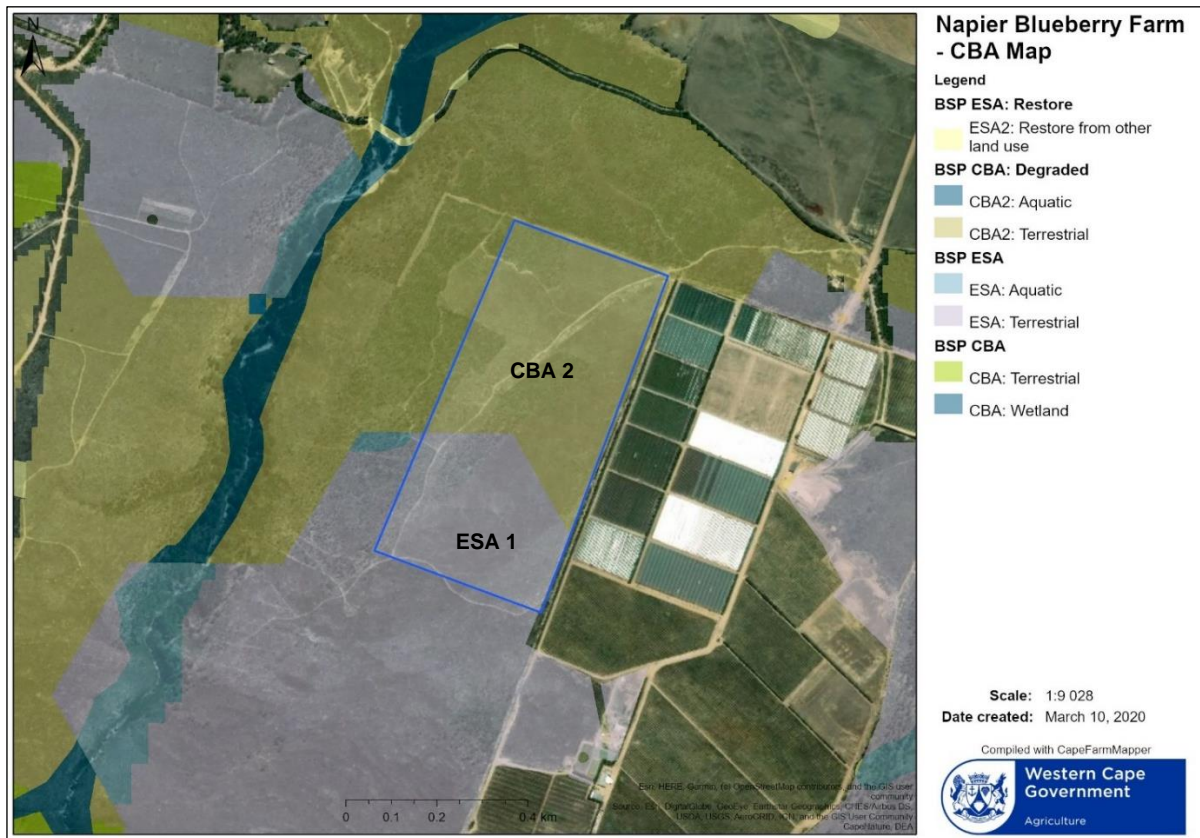
## 6. BIODIVERSITY

**Note:** The Department may request specialist input/studies depending on the nature of the biodiversity occurring on the site and potential impact(s) of the proposed development. To assist with the identification of the biodiversity occurring on site and the ecosystem status, consult <http://bgis.sanbi.org> or [BGIShelp@sanbi.org](mailto:BGIShelp@sanbi.org). Information is also available on compact disc ("cd") from the Biodiversity-GIS Unit, Tel.: (021) 799 8698. This information may be updated from time to time and it is the applicant/ EAP's responsibility to ensure that the latest version is used. A map of the relevant biodiversity information (including an indication of the habitat conditions as per (b) below) must be provided as an overlay map on the property/site plan as **Appendix D** to this report.

- (a) Highlight the applicable biodiversity planning categories of all areas on preferred and alternative sites and indicate the reason(s) provided in the biodiversity plan for the selection of the specific area as part of the specific category. Also describe the prevailing level of protection of the Critical Biodiversity Area ("CBA") and Ecological Support Area ("ESA") (how many hectares / what percentages are formally protected).

Systematic Biodiversity Planning Category	CBA	ESA	Other Natural Area ("ONA")	No Natural Area Remaining ("NNR")
If CBA or ESA, indicate the reason(s) for its selection in biodiversity plan and the conservation management objectives				
Describe the site's CBA/ESA quantitative values (hectares/percentage) in relation to the prevailing level of protection of CBA and ESA (how many hectares / what percentages are formally protected locally and in the province)	<p>The <i>2017 Western Cape Biodiversity Spatial Plan</i> (CapeNature, 2017) assigns CBA2 and ESA2 conservation planning categories to the site:</p> <ul style="list-style-type: none"> <li>• CBA2 (Critical Biodiversity Area 2 - Terrestrial): Approximately 60% of the preferred site.</li> <li>• ESA (Ecological Support Area): Remaining 40% of the preferred site.</li> </ul> <p>CBA2 - Areas in a degraded or secondary condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.</p> <p>ESA – Areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of Pas or CBAs, and that are often vital for delivering ecosystem services.</p> <p>Please refer to Figure 7 below.</p> <p><u>However</u>, according to the Botanical Impact Assessment (<b>Appendix G1</b>), the situation in the study area is a good example of where the information gathered in the field provides the opposite. It is acknowledged that the study area has been negatively affected by alien invasive species but all records in this study show that the vegetation is the same type with mostly the same species throughout. The northern area has been altered by the effect of alien invasion, physical clearing and re-invasion by alien plant species. This has had a negative impact on the northern part of the study area in contrast to the southern part that is largely intact and not as strongly negatively impacted as the northern part. Consequently, it is the view of the specialist that the biodiversity map for the area in question should appear as redrafted (refer to Figure 8 below), where the northern part is mapped as ESA1 and the southern part as CBA2 (it could even be as high as CBA1 ! ).</p>			

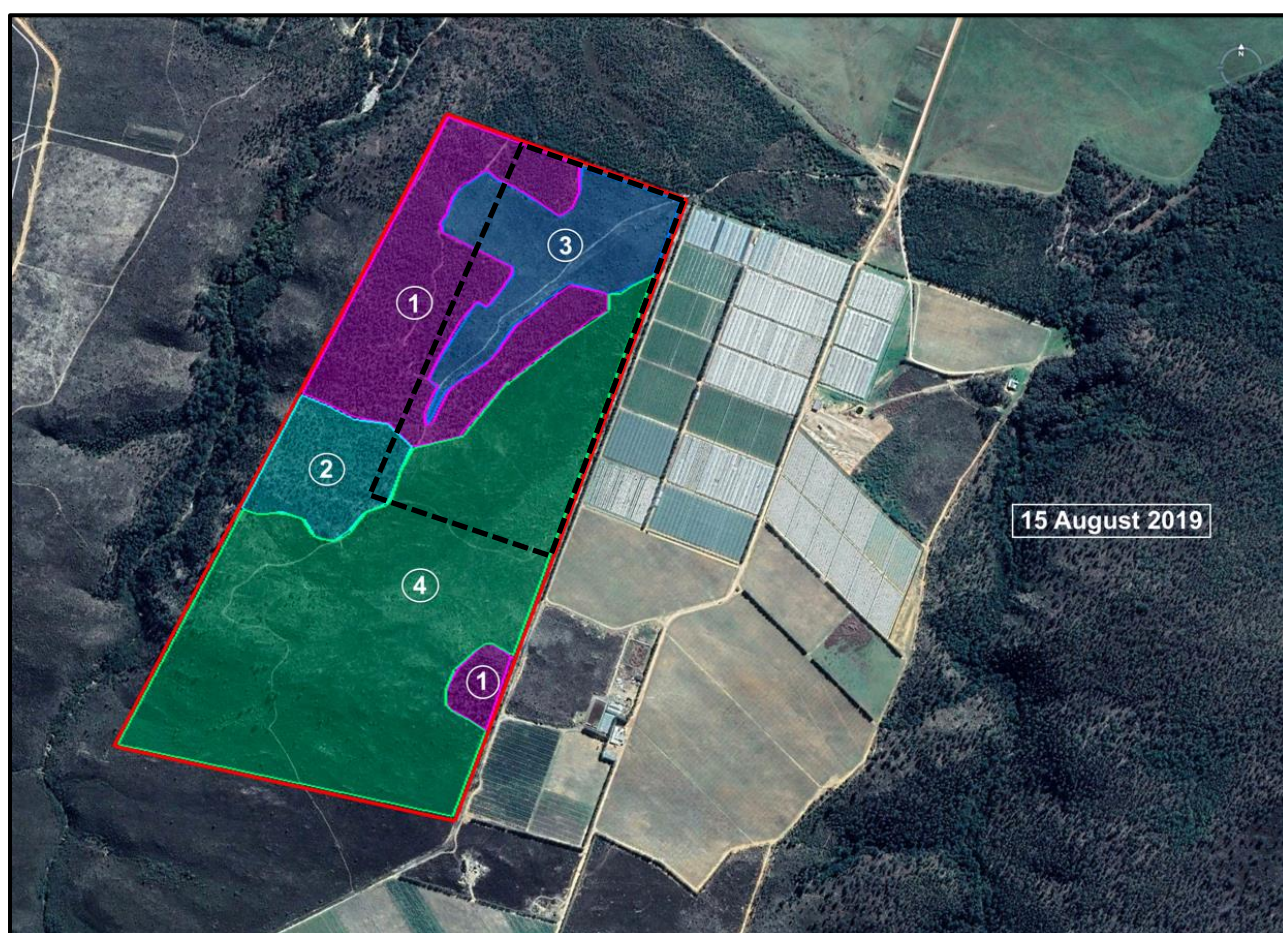






(b) Highlight and describe the habitat condition on site.

Habitat Condition	Percentage of habitat condition class (adding up to 100%) and area of each in square metre (m <sup>2</sup> )		Description and additional comments and observations (including additional insight into condition, e.g. poor land management practises, presence of quarries, grazing/harvesting regimes, etc.)
Natural	%	m <sup>2</sup>	
Near Natural (includes areas with low to moderate level of alien invasive plants)	~44%	~8.5 ha 85000 m <sup>2</sup>	According to the Botanical Impact Assessment ( <b>Appendix G1</b> ), this area is represented in green (Area 4) in Figure 9 below, and consists of intact fynbos but with scattered alien invasive trees and shrubs.
Degraded (includes areas heavily invaded by alien plants)	~55%	~11ha 110000 m <sup>2</sup>	According to the Botanical Impact Assessment ( <b>Appendix G1</b> ), the purple areas marked (1) are areas with dense infestation of alien trees and shrubs; the light blue-green area (2) has a mid-dense cover of alien invasive plants; the blue area (3) in the north cleared of aliens in 2015-2016 but the alien plants are rapidly and aggressively recolonizing the area
Transformed (includes cultivation, dams, urban, plantation, roads, etc.)	<1%	m <sup>2</sup>	An existing two-track farm roads bisects the site.



**Figure 9:** Google Earth image represents the current status of vegetation on the site (**Figure 11 of Appendix G1**). The dashed polygon represents the preferred site (19.5ha)

- (c) Complete the table to indicate:
- the type of vegetation present on the site, including its ecosystem status; and
  - whether an aquatic ecosystem is present on/or adjacent to the site.

Terrestrial Ecosystems		Description of Ecosystem, Vegetation Type, Original Extent, Threshold (ha, %), Ecosystem Status
Ecosystem threat status as per the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)	Critically	<p>According to CapeFarmMapper, the proposed site is covered in Overberg Sandstone Fynbos, and within close proximity to the Elim Ferricrete Fynbos vegetation (both classified as Critically Endangered). (See Figure 10 below)</p> <p>The Botanical Impact Assessment (<b>Appendix G1</b>) confirms the site is located in an area of Overberg Sandstone Fynbos.</p> <p>Overberg Sandstone Fynbos is a sclerophyllous shrubland consisting typically of mid-high to tall proteoid and ericoid shrubs with a graminoid and low to dwarf shrub understorey, mostly composed of restios, some grasses and Asteraceae (Rebello <i>et al.</i> 2006). It is species-rich but typically not all the species found in the vegetation type would be found at any one site. In addition, the species listed by the 'plants species theme' may not all be represented either.</p>
	Endangered	
	Vulnerable	
	Least Threatened	

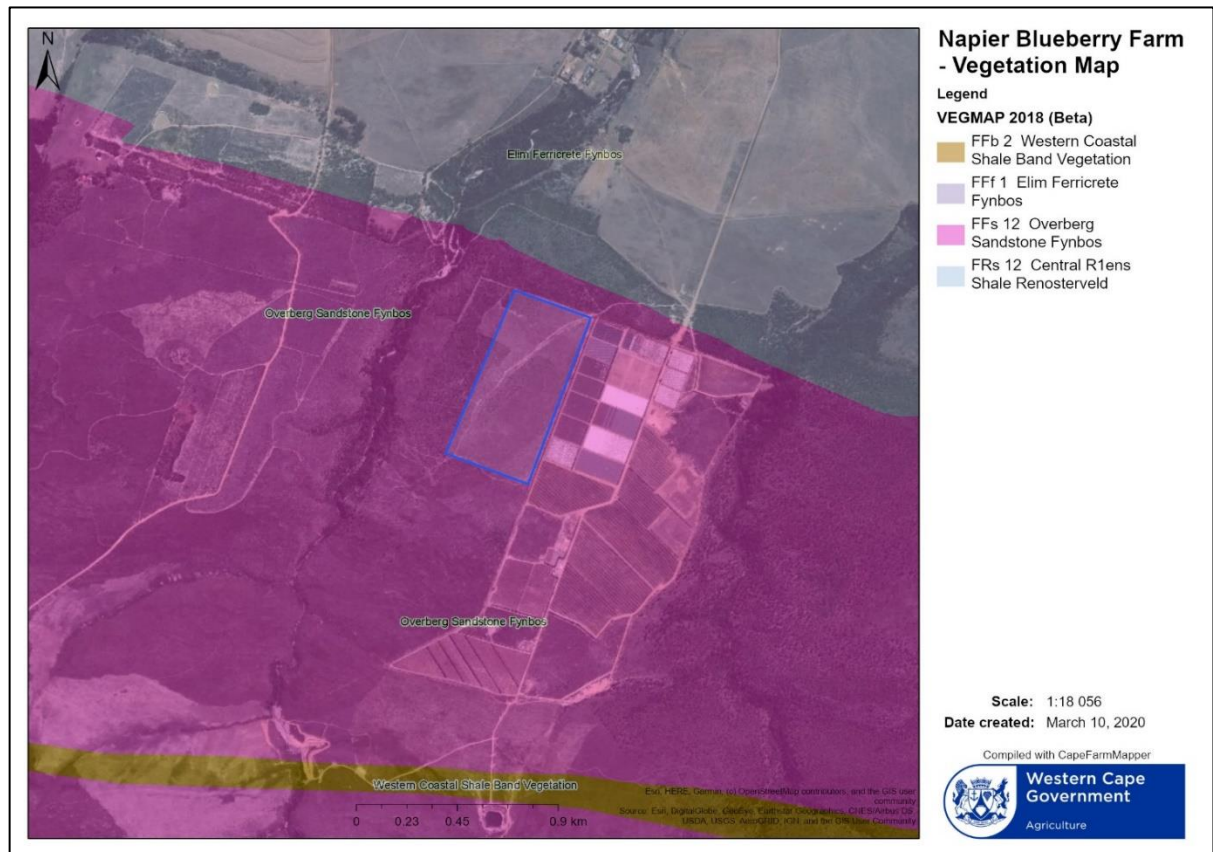


Figure 10: CapeFarmMapper Vegetation Map (*Western Cape Biodiversity Spatial Plan* (CapeNature, 2017))



Aquatic Ecosystems							
Wetland (including rivers, depressions, channelled and unchannelled wetlands, flats, seeps pans, and artificial wetlands)			Estuary		Coastline		
YES	NO	UNSURE	YES	NO	YES	NO	

- (d) Provide a description of the vegetation type and/or aquatic ecosystem present on the site, including any important biodiversity features/information identified on the site (e.g. threatened species and special habitats). Clearly describe the biodiversity targets and management objectives in this regard.

According to the Botanical Impact Assessment (**Appendix G1**), the site is located in an area of Overberg Sandstone Fynbos.

The following is a description of the vegetation sampled at eight waypoints (see Figure 11 below) through the study area by the Botanical Impact Assessment (**Appendix G1**), with alien invasive species marked with \*:



Figure 11: Google Earth image of the waypoint sampling points from the Botanical Impact Assessment (**Appendix G1**). The purple polygon indicates the study area, and the red polygon, the preferred 19.5ha site.

### - Waypoint 1

This sample was recorded at the upper southwest corner of the study area in mature mid-high open to mid-dense proteoid shrubland dominated by *Leucadendron xanthoconus*, with a closed restioid understorey. The soil is sandy with only a few rocks on the surface, all derived from sandstone.

Plants species recorded include, *Acacia longifolia*\*, *Anthospermum aethiopicum*, *Aristea africana*, *Atrichantha gemmifera*, *Aulax umbellata*, *Berzelia lanuginosa*, *Brunia laevis*, *Cliffortia* sp., *Edmondia sesamoides*, *Elegia filacea*, *Elegia juncea*, *Erica* cf. *plukenetii*, *Erica longifolia*, *Erica pogonantha*, *Erica* sp. (dwarf shrub with pink bell-shaped flowers), *Hakea sericea*\*, *Ischyrolepis* sp., *Lebeckia sepiaria*, *Leptospermum laevigatum*\*, *Leucadendron xanthoconus*, *Leucospermum truncatulum*, *Lobelia pinifolia*, *Mimetes cucullatus*, *Phaenocoma prolifera*, *Pinus radiata*\*, *Polygala garcini*, *Protea longifolia*, *Restio* sp., *Serruria elongata*, *Serruria fasciflora* (common), *Serruria* sp. nov., *Struthiola ciliata*, *Thamnochortus* cf. *gracilis*, *Thamnochortus fruticosus*, *Ursinia nudicaulis*, *Xiphotheca* sp.

Alien invasive species such as *Pinus radiata*\*, *Hakea sericea*\* and *Leptospermum laevigatum*\* are scattered in the area around this sample waypoint. They are not dense at present but have the potential to increase rapidly. It is thus imperative that an alien clearing operation should be instituted in this area in the near future.

An important discovery in the area surrounding the sample waypoint on the first site visit was a low-growing, lax, spreading species of *Serruria* new to science. Although within the study area, this plant was located outside of the preferred site.



Figure 12: A flowering shoot of *Serruria* sp. nov. located near waypoint 1 (Botanical Impact Assessment – Appendix G1).

### - Waypoint 2

The same plant community as that found at the first sample waypoint site, with *Leucadendron xanthoconus* prominent, is found throughout the area. It is rockier at this locality and the veld is old with abundant dead plant material. A few termite heaps are present which are a good indicator of a functioning ecosystem. *Serruria elongata* is abundant in this area and additional species recorded include *Anaxeton* sp., *Corymbium scabrum*, *Crassula fascicularis*, *Erica cordifolia*, *Hypodiscus aristatus*, *Hypodiscus* sp., *Leucospermum cordifolium*, *Osyris compressa*, *Protea aspera*, *Restio* sp., *Staberoha cernua* and *Tetraria ustulata*.

The area is becoming heavily invaded by *Leptospermum laevigatum*\* and *Pinus radiata*\*

- **Waypoint 3**

This location is on the track with the same plant community with a few additional species, *Erica* sp., *Syncarpha* sp. and *Zygophyllum fulvum*. This area is becoming heavily encroached by alien invasive *Pinus radiata*\* and *L. laevigatum*\*

- **Waypoint 4**

This location is within the proposed preferred site. The same plant community was found at this location with some additional plant species such as *Diospyros glabra*, *Ehrharta calycina*, *Lanaria lanata*, *Osteospermum moniliferum*, *Penaea mucronata* and *Protea aspera*.

Alien invasive species are present but this area was cleared in the past and the result is that infestation is low. However, the *status quo* could change rapidly if the alien plants are allowed to proliferate.

- **Waypoint 5**

Located on the eastern boundary of the study area in fynbos vegetation, within the proposed preferred site. All the same plant community that has been described previously. This area has evidence of previous infestation by pine trees as can be seen by stumps and decomposing pine logs. Unfortunately, *Leptospermum laevigatum* is invading aggressively in this area.

Despite the history of the presence of pine trees, the fynbos has reverted to moderate to good condition.

The Lycaenid butterfly identified as the Yellow Russet (*Aloeides aranda*) was found and photographed at this location. According to the Botanical Impact Assessment (**Appendix G1**), these butterflies are sensitive to habitat degradation, hence drawing the conclusion that the habitat is in fair to good condition. According to the SANBI Red List of South African Species, *Aloeides aranda* is regarded as Least Concern (LC).

- **Waypoint 6**

This waypoint was recorded in an area of dense invasive pine trees and Australian myrtle. The same fynbos community occurs here as elsewhere in the study area, but it is being smothered by the invasives that include *Acacia longifolia* (long-leaved wattle) at this location

The only additional indigenous fynbos species recorded here was *Erica coccinea*.

- **Waypoint 7**

Located in the northwestern sector of the study area, west of the area that was cleared of pine trees and other invasives in the past few years. The young pine trees are now returning as is the fynbos vegetation, but the latter is not in good condition. *Leptospermum laevigatum* (Australian myrtle) is present throughout the area.

A few additional fynbos species of interest were recorded namely *Aspalathus* sp., *Leucospermum calligerum* and *Struthiola tomentosa*

- **Waypoint 8**

This waypoint was recorded at the northwest corner of the study area on the track next to the fence. On the right-hand-side of the track is a very dense stand of alien invasive pine and myrtle. Further along the track, the alien vegetation has been cleared of large pine trees, but young trees are returning. *Acacia saligna* (Port Jackson Willow) and *Acacia longifolia* (long-leaved wattle) are also invasive in this area and Australian myrtle occurs in abundance. The fynbos is rapidly being overrun by alien invasive plant species since the last clearing.

## **Freshwater Resources**

According to the Freshwater Verification (**Appendix G2**), there are no watercourses within the proposed site. The nearest watercourse is the Klipdrif River, located approximately 230m to the west of the site. The Klipdrif River flows in a northerly direction. The active channel consists of a cobble bed, while the riparian marginal vegetation is dominated by large tree species. The river embankment is steep, as it is situated in a valley, named the Vlermuiskelderkloof. Surface water within the active channel was flowing despite the field assessment undertaken in the drier summer period.

Although the NFEPA database (2011) classified the Klipdrif River as a natural seep wetland, it can be classified as a riparian watercourse as defined by the National Water Act, 1998 (Act No. 36 of 1998).

According to the Freshwater Verification (**Appendix G2**), the river is considered to be in a good ecological condition. The only significant impact evident on site was the invasion of alien tree species, however these species aid with the prevention of erosion considering the steep embankments of the valley and river. Additionally, considering that the reach of the river verified during the site assessment is located in the headwaters of the drainage network and the limited upstream land use transformation, the water quality of the river is considered to be good.

The Groot Sand River is located approximately 740m east of the site.

The freshwater verification (**Appendix G2**) concluded that as the proposed development is located approximately 230m east of the identified watercourse (the Klipdrif River) and not within any associated legislative regulated zones, no further authorisation from a freshwater ecological perspective is required for the proposed development.

## **7. LAND USE OF THE SITE**

**Note:** The Department may request specialist input/studies depending on the nature of the land use character of the area and potential impact(s) of the proposed development.

Untransformed area	Low density residential	Medium density residential	High density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	Medium industrial	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	Tourism and Hospitality facility
Open-cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	Dam or reservoir
Hospital/medical centre	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes and more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	Agriculture	River, stream or wetland	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):				

(a) Provide a description.

The site is undeveloped and near natural. However, the site has extensive alien vegetation infestation in parts of the site, with evidence of past alien vegetation removal.



## 8. LAND USE CHARACTER OF THE SURROUNDING AREA

- (a) Highlight the current land uses and/or prominent features that occur within +/- 500m radius of the site and neighbouring properties if these are located beyond 500m of the site.

**Note:** The Department may request specialist input/studies depending on the nature of the land use character of the area and potential impact(s) of the proposed development.

Untransformed area	Low-density residential	Medium-density residential	High-density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	Medium industrial	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	Tourism and Hospitality facility
Open-cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	Dam or reservoir
Hospital/medical centre	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes and more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	Agriculture	River, stream or wetland	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):				

- (b) Provide a description, including the distance and direction to the nearest residential area, industrial area, agri-industrial area.

The site is located approximately 2.3km south of Napier town centre, and 13km west-north-west of Bredasdorp. The site is generally surrounded by natural areas to the south and west, and agricultural developments to the east and north. Please refer to Figure 13 below.



Figure 13: Google Earth image showing the surrounding land-uses, and nearest residential areas

## 9. SOCIO-ECONOMIC ASPECTS

- a) Describe the existing social and economic characteristics of the community in the vicinity of the proposed site, in order to provide baseline information (for example, population characteristics/demographics, level of education, the level of employment and unemployment in the area, available work force, seasonal migration patterns, major economic activities in the local municipality, gender aspects that might be of relevance to this project, etc.).

Napier is situated in the Cape Agulhas Municipality. According to the Cape Agulhas Municipality Socio-Economic Profile (2017), the municipality has a population of 35 331, with 11 321 households.

The municipality has a Gini coefficient of 0.57, and a Human Development Index of 0.72.

The percentage of households that have access to basic services are as follows:

- Water - 93.2%
- Refuse removal – 90.2%
- Electricity – 97.6%
- Sanitation – 92%
- Housing 88.1%

The Cape Agulhas area economy contributed approximately R2.6 billion (15.0 per cent) to the economy of the District in 2015. Overall, the Cape Agulhas economy has grown at a slower pace on average annually between 2005 and 2015 (3.3 per cent) when compared with the District (3.6 per cent).

Agriculture, forestry and fishing contributed 6.3% to the GDP (2015) to the value of R163.2 million.

Economic growth has been declining since 2012, with the lowest post-recession economic growth rate of 0.6 per cent in 2016. The agriculture, forestry and fishing, the general government, mining and quarrying and the electricity, gas and water sectors contracted in 2016 which can, amongst others, be attributed to the ongoing drought, the weakening exchange rate, fuel price increases and political instability all of which are contributing to the weakening of the South African economy.

Agriculture, forestry and fishing contributed 12.2% to employment (2015) with approximately 1900 jobs.

Unemployment has been steadily rising in the Cape Agulhas municipal area over the last decade, with an unemployment rate of 9.5 per cent recorded in 2015. In 2016, the unemployment rate of the Cape Agulhas municipal area is estimated to have increased to 10.0 per cent, which is marginally higher than that of the Overberg District (13.5 per cent) but significantly lower than that of the Province (18.7 per cent in 2016).

## 10. HISTORICAL AND CULTURAL ASPECTS

- (a) Please be advised that if section 38 of the NHRA is applicable to your proposed development, you are requested to furnish this Department with written comment from Heritage Western Cape as part of your public participation process. Heritage Western Cape must be given an opportunity, together with the rest of the I&APs, to comment on any Pre-application BAR, a Draft BAR, and Revised BAR.

Section 38 of the NHRA states the following:

"38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as-

- (a) the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;
- (b) the construction of a bridge or similar structure exceeding 50m in length;
- (c) any development or other activity which will change the character of a site-
  - (i) exceeding 5 000m<sup>2</sup> in extent; or
  - (ii) involving three or more existing erven or subdivisions thereof; or
  - (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
  - (iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;
- (d) the re-zoning of a site exceeding 10 000m<sup>2</sup> in extent; or
- (e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority,

must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development".

- (b) The impact on any national estate referred to in section 3(2), excluding the national estate contemplated in section 3(2)(i)(vi) and (vii), of the NHRA, must also be investigated, assessed and evaluated. Section 3(2) states the following:
- "3(2) Without limiting the generality of subsection (1), the national estate may include—
- (a) places, buildings, structures and equipment of cultural significance;
  - (b) places to which oral traditions are attached or which are associated with living heritage;
  - (c) historical settlements and townscapes;
  - (d) landscapes and natural features of cultural significance;
  - (e) geological sites of scientific or cultural importance;
  - (f) archaeological and palaeontological sites;
  - (g) graves and burial grounds, including—
    - (i) ancestral graves;
    - (ii) royal graves and graves of traditional leaders;
    - (iii) graves of victims of conflict;
    - (iv) graves of individuals designated by the Minister by notice in the Gazette;
    - (v) historical graves and cemeteries; and
    - (vi) other human remains which are not covered in terms of the Human Tissue Act, 1983 (Act No. 65 of 1983);
  - (h) sites of significance relating to the history of slavery in South Africa;
  - (i) movable objects, including—
    - (i) objects recovered from the soil or waters of South Africa, including archaeological and paleontological objects and material, meteorites and rare geological specimens;
    - (ii) objects to which oral traditions are attached or which are associated with living heritage;
    - (iii) ethnographic art and objects;
    - (iv) military objects;
    - (v) objects of decorative or fine art;
    - (vi) objects of scientific or technological interest; and
    - (vii) books, records, documents, photographic positives and negatives, graphic, film or video material or sound recordings, excluding those that are public records as defined in section 1(xiv) of the National Archives of South Africa Act, 1996 (Act No. 43 of 1996)".

Is Section 38 of the NHRA applicable to the proposed development?		YES	NO	UNCERTAIN
If YES or UNCERTAIN, explain:	<p>A Notice of Intent to Develop (NID) was submitted to Heritage Western Cape on 30 September 2019.</p> <p>According to the Heritage Notice of Intent to Develop, the area straddles the uppermost two formations of the Table Mountain Group, viz. the Skurweberg and Rietvlei formations, of LOW/BUE and HIGH/ORANGE palaeosensitivities, respectively (SAHRIS Palaeomap). Although this interval of strata is fossiliferous, the rich fossil content occurs further north where deformation of the Cape Fold Belt is less intense. These strata in the south are not distinguished by well-preserved fossil content. Furthermore, deep weathering during the Cenozoic has degraded the fossils in the subsurface. Due to deformation and weathering the fossil potential/sensitivity is low. The surficial disturbance of the weathered soils by agricultural activity is unlikely to impact upon palaeontological resources.</p> <p>There is a possibly of a few stone tools of low archaeological significance. Impacts on heritage resources is likely to be very low.</p> <p>A response, dated 15 October 2019 was received, confirming that no further heritage studies was required since there is no reason to believe that the proposed development will impact on heritage resources. No further action in terms of Section 38 of NHRA is required (See <b>Appendix E1</b>).</p>			
	Will the development impact on any national estate referred to in Section 3(2) of the NHRA?	YES	NO	UNCERTAIN
If YES or UNCERTAIN, explain:				
Will any building or structure older than 60 years be affected in any way?		YES	NO	UNCERTAIN
If YES or UNCERTAIN, explain:				
Are there any signs of culturally or historically significant elements, as defined in section 2 of the NHRA, including Archaeological or paleontological sites, on or close (within 20m) to the site?		YES	NO	UNCERTAIN

If YES or UNCERTAIN, explain:	
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**Note:** If uncertain, the Department may request that specialist input be provided **and** Heritage Western Cape must provide comment on this aspect of the proposal. (Please note that a copy of the comments obtained from the Heritage Resources Authority must be appended to this report as Appendix E1).

## 11. APPLICABLE LEGISLATION, POLICIES, CIRCULARS AND/OR GUIDELINES

- (a) Identify all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks, and instruments that are applicable to the development proposal and associated listed activity(ies) being applied for and that have been considered in the preparation of the BAR.

LEGISLATION, POLICIES, PLANS, GUIDELINES, SPATIAL TOOLS, MUNICIPAL DEVELOPMENT PLANNING FRAMEWORKS, AND INSTRUMENTS	ADMINISTERING AUTHORITY and how it is relevant to this application	TYPE Permit/license/authorisation/comment / relevant consideration (e.g. rezoning or consent use, building plan approval, Water Use License and/or General Authorisation, License in terms of the SAHRA and CARA, coastal discharge permit, etc.)	DATE (if already obtained):
Conservation of Agricultural Resources Act 1983 (CARA)	Western Cape Department of Agriculture	Unknown – awaiting comment from Department of Agriculture	
National Heritage Resources Act (No. 25 of 1999)	South African Heritage Resources Agency	Notification of Intent to Develop, in terms of Section 38(8).	15 October 2019

- (b) Describe how the proposed development **complies with and responds** to the legislation and policy context, plans, guidelines, spatial tools, municipal development planning frameworks and instruments.

LEGISLATION, POLICIES, PLANS, GUIDELINES, SPATIAL TOOLS, MUNICIPAL DEVELOPMENT PLANNING FRAMEWORKS, AND INSTRUMENTS	Describe how the proposed development complies with and responds:
DEADP Guidelines	All guidelines were consulted and adhered to when undertaking this Basic Assessment Report.
National Environmental Management Act, 1998 (Act 107, 1998).	This application is being undertaken according to the National Environmental Management Act, 1998.

**Note:** Copies of any comments, permit(s) or licences received from any other Organ of State must be attached to this report as **Appendix E**.



## Section C: PUBLIC PARTICIPATION

The PPP must fulfil the requirements outlined in the NEMA, the EIA Regulations, 2014 (as amended) and if applicable, the NEM: WA and/or the NEM: AQA. This Department's Circular EADP 0028/2014 (dated 9 December 2014) on the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must also be taken into account.

- Please highlight the appropriate box to indicate whether the specific requirement was undertaken or whether there was an exemption applied for.

In terms of Regulation 41 of the EIA Regulations, 2014 (as amended) -			
(a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of -			
(i) the site where the activity to which the application relates, is or is to be undertaken; and	YES	EXEMPTION	
(ii) any alternative site	YES	EXEMPTION	N/A
(b) giving written notice, in any manner provided for in Section 47D of the NEMA, to -			
(i) the occupiers of the site and, if the applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	YES	EXEMPTION	N/A
(ii) 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;	YES	EXEMPTION	
(iii) the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;	YES	EXEMPTION	
(iv) the municipality (Local and District Municipality) which has jurisdiction in the area;	YES	EXEMPTION	
(v) any organ of state having jurisdiction in respect of any aspect of the activity; and	YES	EXEMPTION	
(vi) any other party as required by the Department;	YES	EXEMPTION	N/A
(c) placing an advertisement in -			
(i) one local newspaper; or	YES	EXEMPTION	
(ii) any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;	YES	EXEMPTION	N/A
(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken	YES	EXEMPTION	N/A
(e) using reasonable alternative methods, as agreed to by the Department, in those instances where a person is desirous of but unable to participate in the process due to— (i) illiteracy; (ii) disability; or (iii) any other disadvantage.	YES	EXEMPTION	N/A
<b>If you have indicated that "EXEMPTION" is applicable to any of the above, proof of the exemption decision must be appended to this report.</b>			
Please note that for the NEM: WA and NEM: AQA, a notice must be placed in at least two newspapers circulating in the area where the activity applied for is proposed.			
If applicable, has/will an advertisement be placed in at least two newspapers?	YES	NO	
If "NO", then proof of the exemption decision must be appended to this report.			

- Provide a list of all the State Departments and Organs of State that were consulted:

State Department / Organ of State	Date request was sent:	Date comment received:	Support / not in support
Western Cape Department of Agriculture – Landuse Management	01 October 2019	24 December 2019	Will comment during the Environmental Impact Assessment process
Breede-Gouritz Catchment Management Agency	01 October 2019	04 November 2019	
CapeNature	01 October 2019	09 December 2019	Comment to be given on Draft BAR

Heritage Western Cape	30 September 2019	15 October 2019	No further actions under Section 38 of the NHRA required
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3. Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues were incorporated, or the reasons for not including them.  
(The detailed outcomes of this process, including copies of the supporting documents and inputs must be included in a Comments and Response Report to be attached to the BAR (see note below) as **Appendix F**).

Please see **Appendix F5** for a full summary of comments received from Interested and Affected Parties.

Concerns are primarily with the potential impact on, and loss of, Critically Endangered Overberg Sandstone Fynbos, and potential impacts on freshwater resources.

A Botanical Impact Assessment and Freshwater Verification were conducted.

Breede-Gouritz Catchment Management Agency:

*We would like to register as an Interested and Affected Party.*

CapeNature:

*Will provide comment on the Pre-Application Draft Basic Assessment Report.*

Southern Overberg Branch Botanical Society of S.A.:

*The proposed development area (<20ha) includes Critically Endangered indigenous vegetation (Fynbos), and which contains an extraordinary proportion of rare and endemic species. The fact that the area is largely infested with invasive alien vegetation is not an acceptable reason for proposal of the development. It has been shown many times that once cleared of the alien vegetation the natural indigenous vegetation recovers very quickly.*

*The proximity of the proposed development to the Klippedrif River, a natural watercourse which supplies water to the Napier communities, is of great concern, especially regarding any use of herbicides and pesticides for berry production.*

Napier Mountain Conservancy:

*We would hereby like to register Napier Mountain Conservancy as an interested and affected party for the above-mentioned proposed development.*

*There are 6 property-owners and members of the Conservancy. Our aim as members is to collectively conserve around 1,800 hectares of Critically Endangered Overberg Sandstone Fynbos and to help secure this catchment's ecosystem services (including water, flood management and biodiversity) for the surrounding area, its businesses, agriculture and the town of Napier. The 20ha of the application are part of this catchment.*

*Major investments to secure the optimum functioning of the catchment are being made by government and Conservancy property owners in order to control alien invasive plants and wildfires.*

4. Provide a summary of any conditional aspects identified / highlighted by any Organs of State, which have jurisdiction in respect of any aspect of the relevant activity.

Breede-Gouritz Catchment Management Agency:

*Any activity within the 1:100 year floodline or within 100m of a watercourse or within a 500m radius from the delineated boundary of any wetland or pan triggers a water use activity in terms of Section 21 (c) and (i) of the National Water Act, 1998.*

According to the Freshwater Verification Report (**Appendix G2**), in accordance with Articles of Legislation and the relevant zones of regulation, a 32m (NEMA) and 100m (NWA) Zone of Regulation (ZoR) for riparian watercourses (in the absence of a formal 1 in 100 year floodline) were implemented (see Figure 14 below). These ZoRs are not necessarily an ecological buffer, as future development may occur within these zones provided the relevant authorisations have been obtained. However, considering that the proposed agricultural development is located 230m east of the delineated edge of the Klipdrif River, it is not expected that Activity 12 or 19 of GN327 will be triggered nor will a water use authorisation in terms of the National Water Act, 1998 (Act No. 36 of 1998) (NWA) be required. Nevertheless, the findings of this report must be verified by the relative legislative authorities.

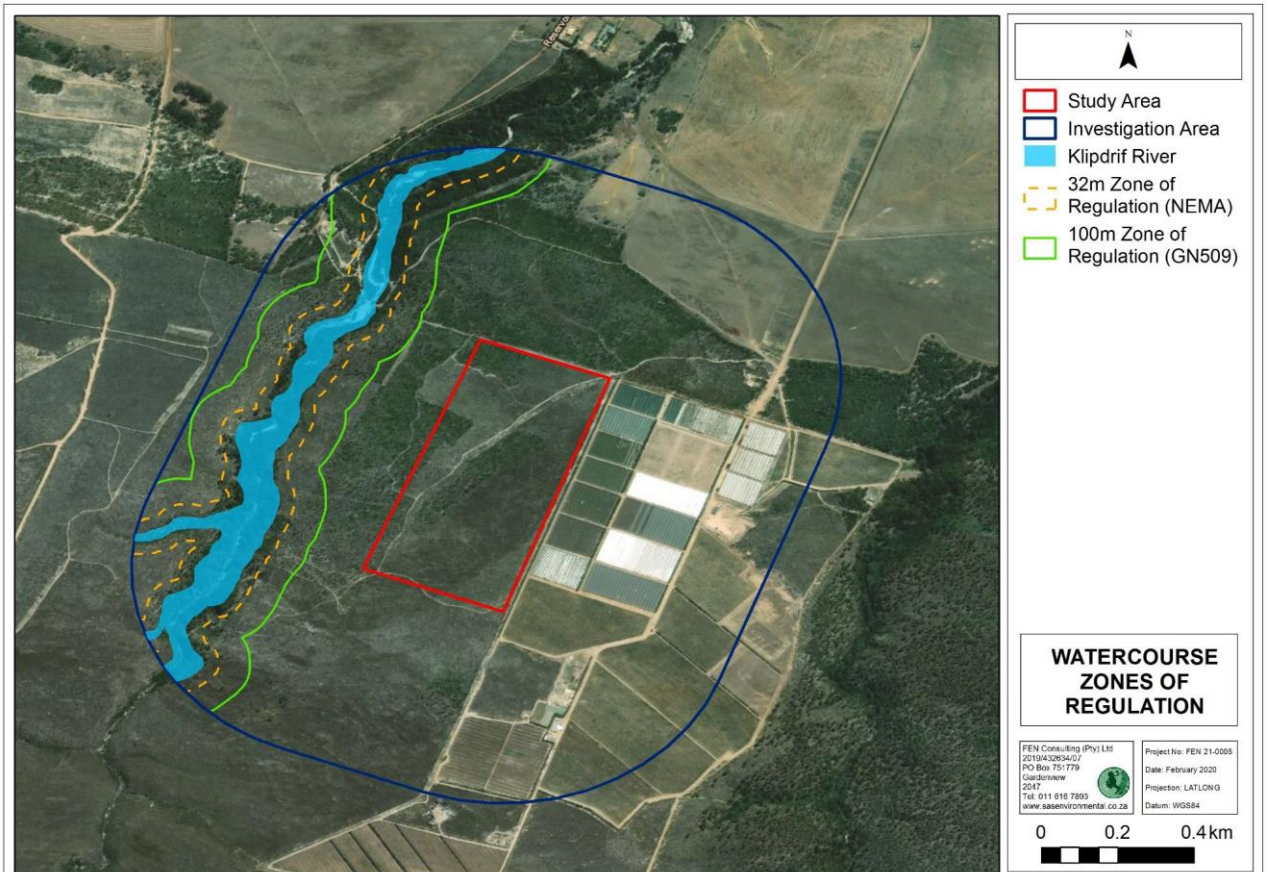


Figure 14: The delineation of the Klipdrif River and its associated NEMA and NWA regulated zones (**Figure 12 of Appendix G2**).

**Note:**

Even if pre-application public participation is undertaken as allowed for by Regulation 40(3), it must be undertaken in accordance with the requirements set out in Regulations 3(3), 3(4), 3(8), 7(2), 7(5), 19, 40, 41, 42, 43 and 44.

If the "exemption" option is selected above and no proof of the exemption decision is attached to this BAR, the application will be refused.

A list of all the potential I&APs, including the Organs of State, notified and a list of all the registered I&APs must be submitted with the BAR. The list of registered I&APs must be opened, maintained and made available to any person requesting access to the register in writing.

The BAR must be submitted to the Department when being made available to I&APs, including the relevant Organs of State and State Departments which have jurisdiction with regard to any aspect of the activity, for a commenting period of at least 30 days. Unless agreement to the contrary has been reached between the Competent Authority and the EAP, the EAP will be responsible for the consultation with the relevant State Departments in terms of Section 24O and Regulation 7(2) – which consultation must happen simultaneously with the consultation with the I&APs and other Organs of State.

All the comments received from I&APs on the BAR must be recorded, responded to and included in the Comments and Responses Report included as **Appendix F** of the BAR. If necessary, any amendments made in response to comments received must be effected in the BAR itself. The Comments and Responses Report must also include a description of the PPP followed.

The minutes of any meetings held by the EAP with I&APs and other role players wherein the views of the participants are recorded, must also be submitted as part of the public participation information to be attached to the final BAR as **Appendix F**.

Proof of all the notices given as indicated, as well as notice to I&APs of the availability of the Pre-Application BAR (if applicable), Draft BAR, and Revised BAR (if applicable) must be submitted as part of the public participation information to be attached to the BAR as **Appendix F**. In terms of the required "proof" the following must be submitted to the Department:

- a site map showing where the site notice was displayed, a 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 D: NEED AND DESIRABILITY

**Note:** Before completing this section, first consult this Department's Circular EADP 0028/2014 (dated 9 December 2014) on the "One Environmental Management System" and the EIA Regulations, 2014 (as amended), any subsequent Circulars, and guidelines available on the Department's website: <http://www.westerncape.gov.za/eadp>. In this regard, it must be noted that the *Guideline on Need and Desirability in terms of the Environmental Impact Assessment (EIA) Regulations, 2010* published by the national Department of Environmental Affairs on 20 October 2014 (GN No. 891 on Government Gazette No. 38108 refers) (available at: [http://www.gov.za/sites/www.gov.za/files/38108\\_891.pdf](http://www.gov.za/sites/www.gov.za/files/38108_891.pdf)) also applied to EIAs in terms of the EIA Regulations, 2014 (as amended).

1. Is the development permitted in terms of the property's existing land use rights?	YES	NO	Please explain
The property is zoned Agricultural.			
2. Will the development be in line with the following?			
(a) Provincial Spatial Development Framework ("PSDF").	YES	NO	Please explain
The proposed development is the development of berry crops in an agricultural area, on property zoned for agricultural use.			
(b) Urban edge / edge of <b>built environment</b> for the area.	YES	NO	Please explain
The site is located outside the urban edge			
(c) Integrated Development Plan and Spatial Development Framework of the Local Municipality (e.g., would the approval of this application compromise the integrity of the existing approved and credible municipal IDP and SDF?).	YES	NO	Please explain
<p>According to the Cape Agulhas Integrated Development Plan (IDP) (2016/17), economic development is a key development goal, with the objective to facilitate economic development by creating a conducive environment for business development and unlock opportunities to increase participation amongst all sectors of society in the mainstream economy to ultimately create decent job opportunities.</p> <p>According to the Cape Agulhas Spatial Development Framework (SDF) (2017-2022), the WCG Department of Economic Development and Tourism provided support to the Municipality to apply and facilitate a PACA process, aimed at identifying medium and short term catalytic projects or economic opportunities that will make a tangible contribution to economic growth. Local stakeholders participated actively in the process. The process identified the following sectors as being key to development of the local economy:</p> <ul style="list-style-type: none"> <li>• Agriculture, which has had good crop yields in recent years and contributed to growth, despite declining employment.</li> </ul> <p>According to the Cape Agulhas Spatial Development Framework (SDF) (2017-2022), Napier SDF proposals include that Natural/ ecological elements be protected. Proposals include:</p> <ul style="list-style-type: none"> <li>- Protect CBAs, ESAs, and river corridor from development</li> <li>- Maintain the productive capacity of agricultural land surrounding the town as far as is possible.</li> </ul>			
(d) An Environmental Management Framework ("EMF") adopted by this Department. (e.g., Would the approval of this application compromise the integrity of the existing environmental management priorities for the area and if so, can it be justified in terms of sustainability considerations?)	YES	NO	Please explain
No EMF was identified			
(e) Any <b>other</b> Plans (e.g., Integrated Waste Management Plan (for waste management activities), etc.)).	YES	NO	Please explain
N/A			
3. Is the land use (associated with the project being applied for) considered within the timeframe intended by the existing approved SDF agreed to by the relevant environmental authority (in other words, is the proposed development in line with the projects and programmes identified as priorities within the credible IDP)?	YES	NO	Please explain
The proposed development is the development of berry crops in an agricultural area, on property zoned for agricultural use.			

4. Should development, or if applicable, expansion of the town/area concerned in terms of this land use (associated with the activity being applied for) occur on the proposed site at this point in time?	YES	NO	Please explain
The proposed development is the development of berry crops in an agricultural area, on property zoned for agricultural use. It will not lead to the expansion of the town.			
5. Does the community/area need the project and the associated land use concerned (is it a societal priority)? (This refers to the strategic as well as local level (e.g., development is a National Priority, but within a specific local context it could be inappropriate.)	YES	NO	Please explain
<p>The proposed development will lead to jobs in both the construction and operational phase of the development. According to the Applicant, the proposed development is expected to create approximately 80 jobs during the construction phase, 90% of which will be accrued to previously disadvantaged individuals. The development is expected to create approximately 25 jobs, 90% of which will be accrued to previously disadvantaged individuals, during the operational phase.</p> <p>It will also contribute to the agricultural industry in the area.</p> <p>However, concerns regarding the loss of critically endangered vegetation and its impact on the Napier Mountain Conservancy, the potential impact of the development on freshwater resources in the area, as well as the potential visual impact on the character of the area surrounding Napier, have been raised by residents of Napier (please refer to Appendix F).</p>			
6. Are the necessary <b>services</b> available together with adequate unallocated municipal capacity (at the time of application), or must additional capacity be created to cater for the project? (Confirmation by the relevant municipality in this regard must be attached to the BAR as <b>Appendix E</b> .)	YES	NO	Please explain
N/A. The proposed development will not be requiring any services from the municipality.			
7. Is this project provided for in the <b>infrastructure planning</b> of the municipality and if not, what will the implication be on the infrastructure planning of the municipality (priority and placement of services and opportunity costs)? (Comment by the relevant municipality in this regard must be attached to the BAR as <b>Appendix E</b> .)	YES	NO	Please explain
N/A. The proposed development is the development of berry crops in an agricultural area, on property zoned for agricultural use.			
8. Is this project part of a <b>national programme</b> to address an issue of national concern or importance?	YES	NO	Please explain
The proposed development is the development of berry crops in an agricultural area, on property zoned for agricultural use.			
9. Do location factors favour this land use (associated with the development proposal and associated listed activity(ies) applied for) at this place? (This relates to the contextualisation of the proposed land use on the proposed site within its broader context.)	YES	NO	Please explain
The site is directly adjacent to Napier Berries existing crops and has direct access			
10. Will the development proposal or the land use associated with the development proposal applied for, impact on sensitive natural and cultural areas (built and rural/natural environment)?	YES	NO	Please explain
<p>Although the development will lead to the loss of 19.5ha of viable Overberg Sandstone Fynbos according to the Botanical Impact Assessment (<b>Appendix G1</b>), the proposed site has been most affected by invasion of alien plant species and cycles of disturbance such as clearing and leaving fallow with unattended regeneration of the alien shrubs and trees. The fynbos in this area has already been negatively affected and degraded. The impact of the development would be Medium due to the level of alien invasive infestation within the area.</p> <p>According to the Botanical Impact Assessment (<b>Appendix G1</b>), the loss of 20 ha of Overberg Sandstone Fynbos on the northern slopes of the Soetmuisberg would be negative wherever it occurred, particularly in view of having found an undescribed no-doubt endemic species of <i>Serruria</i> and the likelihood of more endemic species present. On balance, however, development of the northern 20 ha is acceptable if mitigation measures are applied. The recommended mitigation is that the alien invasive plant species, <i>Pinus radiata</i>*,</p>			



*Leptospermum laevigatum*\*, *Acacia longifolia*\*, *Acacia saligna*\* and *Hakea sericea*\* should be systematically cleared and removed from the entire part of Portion 3 of Vierfontein 143 i.e. the southern part of the study area and beyond to the higher altitude parts of Portion 3.

The mitigation described above would compensate for the loss of the 20 ha of degraded fynbos in the northern part of the study area and would contribute positively to the efforts of the Napier Mountain Conservancy aimed at eradicating the alien vegetation in the catchments of the Groot Sanddrif River.

According to the Botanical Impact Assessment (**Appendix G1**), the proposed site is in relatively poor condition and, if left, the negative impact of the invasive alien species would be roughly equivalent to the effect of development of this area. Cumulative impacts of the development of the Northern 20 ha would thus be low for the vegetation type (Overberg Sandstone Fynbos) as a whole.

The proposed development is not expected to have any impacts on cultural resources.

11. Will the development impact on people's health and well-being (e.g., in terms of noise, odours, visual character and 'sense of place', etc.)?	YES	NO	Please explain
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The proposed development is the development of berry crops in an agricultural area, on property zoned for agricultural use.

The proposed development is not expected to impact on people's health or well-being.

Due to the nature of the development, the site and the surrounding land-uses, the proposed development is not expected to have any significant negative impact on the visual character of the area, as it is directly adjacent to Napier Berries existing crops.

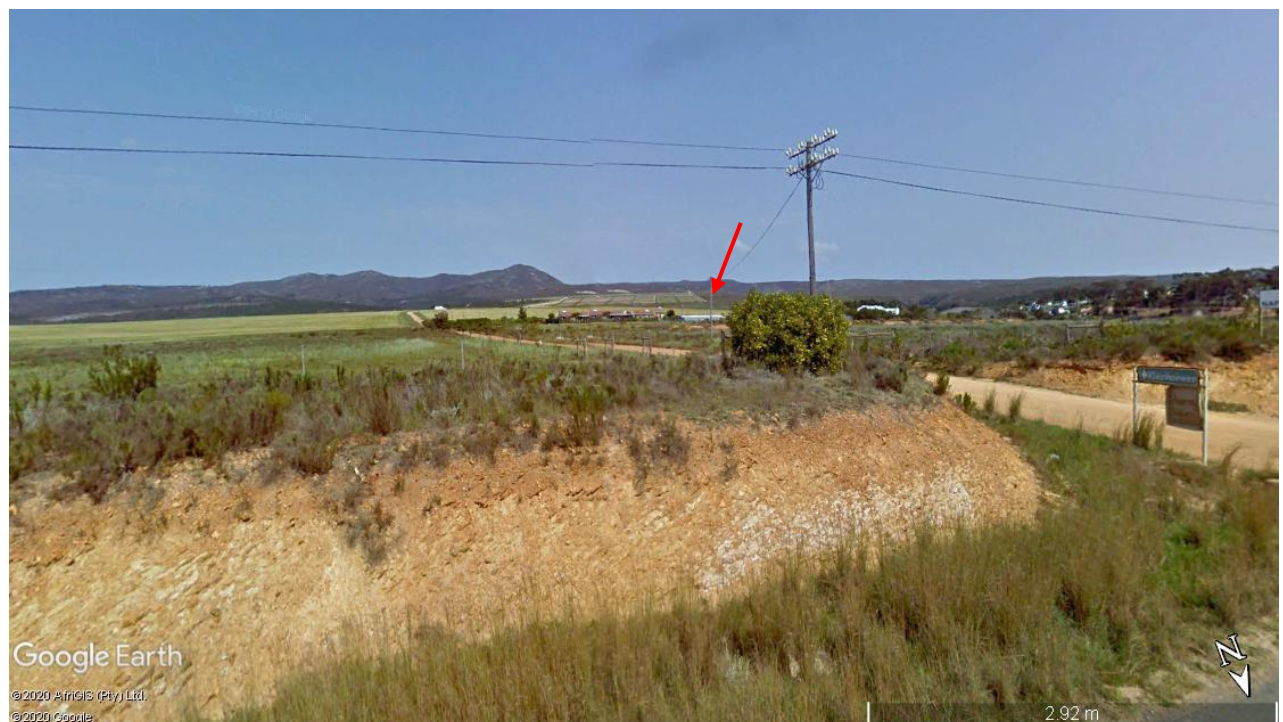


Figure 15: Google Street View from the R316. Approximate location indicated by the red arrow



Figure 16: Google Street View from Napier. Approximate location indicated by the red arrow.

12. Will the proposed development or the land use associated with the proposed development applied for, result in unacceptable opportunity costs?	YES	NO	Please explain
No unacceptable opportunity costs are expected.			
13. What will the <b>cumulative impacts</b> (positive and negative) of the proposed land use associated with the development proposal and associated listed activity(ies) applied for, be?			
According to the Botanical Impact Assessment ( <b>Appendix G1</b> ), the proposed site is in relatively poor condition and, if left, the negative impact of the invasive alien species would be roughly equivalent to the effect of development of this area. Cumulative impacts of the development of the Northern 20 ha would thus be low for the vegetation type (Overberg Sandstone Fynbos) as a whole.			
14. Is the development the <b>best practicable environmental option</b> for this land/site?	YES	NO	Please explain
The best practicable environmental option would be not to develop (no-go option). However, according to the Botanical Impact Assessment ( <b>Appendix G1</b> ), the site would thus remain much as it is, but with the invasive alien plants continuing to be a source of problems, both in terms of spread and fire management.			
The socio-economic benefits of the development would also not be realised if the development did not continue.			
15. What will the benefits be to society in general and to the local communities?			Please explain
The proposed development will lead to jobs in both the construction and operational phase of the development. According to the Applicant, the proposed development is expected to create approximately 80 jobs during the construction phase, 90% of which will be accrued to previously disadvantaged individuals. The development is expected to create approximately 25 jobs, 90% of which will be accrued to previously disadvantaged individuals, during the operational phase.			
It will also contribute to the agricultural industry in the area.			
16. Any <b>other</b> need and desirability considerations related to the proposed development?			Please explain
According to the Applicant, the farm has no commercial operation, therefor not a sustainable production unit and with available water source from the Vierfontein dam, access to a sustainable farming solution, an opportunity exists where a small portion of the farm can be used to create a sustainable business that will create much needed jobs and the opportunity to manage aliens on the rest of the farm.			



Apart from creating much needed employment, working in a sustainable industry is conducive and will create stability in the family, education and lessen the dependency on alcohol.

17. Describe how the **general objectives of Integrated Environmental Management** as set out in Section 23 of the NEMA have been taken into account:

The general objectives of Integrated Environmental Management have been taken into account through the following:

- The actual and potential impacts of the activity on the environment, socio-economic conditions and cultural heritage have been identified, predicted and evaluated, as well as the risks and consequences and alternatives and options for mitigation of activities, with a view to minimizing negative impact, maximizing benefits and promoting compliance with the principles of environmental management – *please refer to Section F below.*
- The effects of the activity on the environment have been considered before actions taken in connection with them – *alternatives have been considered and investigated (please refer to Section E below).*
- Adequate and appropriate opportunity for public participation is ensured through the public participation process
- The environmental attributes have been considered in the management and decision-making of the activity – *an EMP has been included (**Appendix H**) with the proposed activity and must adhere to the requirements of all applicable state Authorities.*

18. Describe how the **principles of environmental management** as set out in Section 2 of the NEMA have been taken into account:

The principles of environmental management as set out in section 2 of NEMA have been taken into account. The principles pertinent to this activity include:

- People and their needs have been placed at the forefront while serving their physical, psychological, developmental, cultural and social interests – *the proposed activity will have a beneficial impact on people, especially to the agricultural industry.*
- Development must be socially, environmentally and economically sustainable. Where disturbance of ecosystems, loss of biodiversity, pollution and degradation, and landscapes and sites that constitute the nation's cultural heritage cannot be avoided, are minimised and remedied. - *Although the activity is expected to have little significant environmental impact, these impacts have been considered, and mitigation measures have been put in place. This is dealt with in the EMP (**Appendix H**).*
- Where waste cannot be avoided, it is minimised and remedied through the implementation and adherence of EMP.
- The use of non-renewable natural resources is responsible and equitable – *no exploitation of non-renewable natural resources occurs with the proposed activity.*
- The negative impacts on the environment and on people's environmental rights have been anticipated and prevented, and where they cannot be prevented, are minimised and remedied - *refer to Section F below.*
- The interests, needs and values of all interested and affected parties will be taken into account in any decisions through the Public Participation Process
- The social, economic and environmental impacts of the activity have been considered, assessed and evaluated, including the disadvantages and benefits – *refer to Section F below.*
- The effects of decisions on all aspects of the environment and all people in the environment have been taken into account, by pursuing what is considered the best practicable environmental option – *the proposed activity is expected to have minimal/negligible environmental impacts, especially after mitigation measures as described under Section F and in the EMP are implemented.*

## SECTION E: DETAILS OF ALL THE ALTERNATIVES CONSIDERED

**Note:** Before completing this section, first consult this Department's Circular EADP 0028/2014 (dated 9 December 2014) on the "One Environmental Management System" and the EIA Regulations, 2014 (as amended), any subsequent Circulars, and guidelines available on the Department's website <http://www.westerncape.gov.za/eadp>.

The EIA Regulations, 2014 (as amended) defines "alternatives" as "*in relation to a proposed activity, means different means of fulfilling the general purpose and requirements of the activity, which may include alternatives to the—*

*(a) property on which or location where the activity is proposed to be undertaken;*

*(b) type of activity to be undertaken;*

*(c) design or layout of the activity;*

*(d) technology to be used in the activity; or*

*(e) operational aspects of the activity;*

*(f) and includes the option of not implementing the activity;"*

The NEMA (section 24(4)(a) and (b) of the NEMA, refers) prescribes that the procedures for the investigation, assessment and communication of the potential consequences or impacts of activities on the environment must, *inter alia*, with respect to every application for environmental authorisation –

- ensure that the general objectives of integrated environmental management laid down in the NEMA and the National Environmental Management Principles set out in the NEMA are taken into account; and
- include an investigation of the potential consequences or impacts of the alternatives to the activity on the environment and assessment of the significance of those potential consequences or impacts, including the option of not implementing the activity.

The general objective of integrated environmental management (section 23 of NEMA, refers) is, *inter alia*, to "*identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage, the risks and consequences and alternatives and options for mitigation of activities, with a view to minimising negative impacts, maximising benefits, and promoting compliance with the principles of environmental management*" set out in the NEMA.

The identification, evaluation, consideration and comparative assessment of alternatives directly relate to the management of impacts. Related to every identified impact, alternatives, modifications or changes to the activity must be identified, evaluated, considered and comparatively considered to:

- in terms of negative impacts, firstly avoid a negative impact altogether, or if avoidance is not possible alternatives to better mitigate, manage and remediate a negative impact and to compensate for/offset any impacts that remain after mitigation and remediation; and
- in terms of positive impacts, maximise impacts.

### 1. DETAILS OF THE IDENTIFIED AND CONSIDERED ALTERNATIVES AND INDICATE THOSE ALTERNATIVES THAT WERE FOUND TO BE FEASIBLE AND REASONABLE

**Note:** A full description of the investigation of alternatives must be provided and motivation if no reasonable or feasible alternatives exists.

(a) Property and **location/site** alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

An area of approximately 43ha has been identified on the farm which could possibly accommodate the 19.5ha development, leaving various location alternatives to optimally locate the establishment of blueberries. Two broad areas are therefore considered for possible development, the northern part and the southern part (although a combination/overlap of the two sites could also be considered).

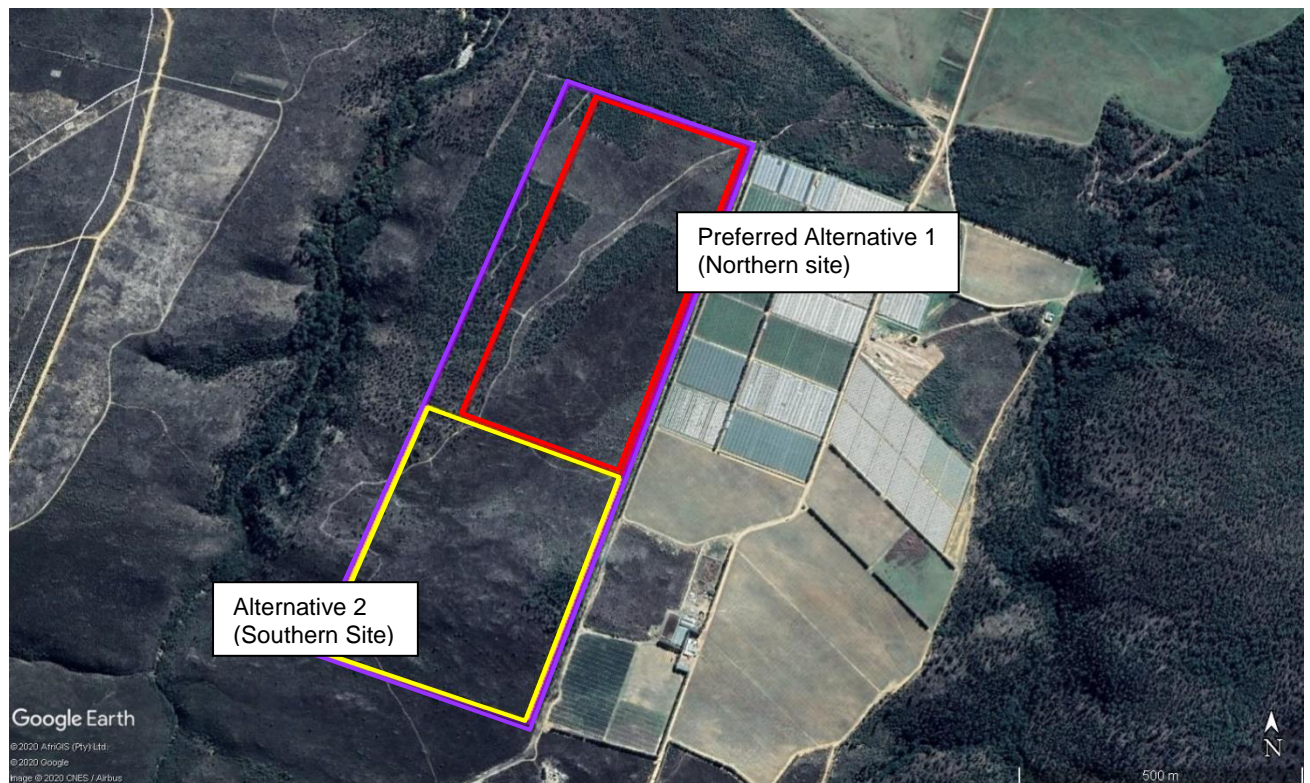


Figure 17: Google Earth Image showing alternative sites. The purple polygon indicates the 43ha area assessed and considered for development. The red polygon indicates the preferred site alternative (Alternative 1 - 19.5ha). The yellow polygon indicates a potential alternative site (Alternative 2 – 19.5ha)

#### Preferred Site (Alternative 1)

The preferred site alternative for the applicant is on the north-eastern corner of the proposed site. This is preferred as it is adjacent to the existing berry crops and closer to the existing access roads, reducing transport and management costs for the Applicant.

It is also the preferred site from an environmental perspective. The site is approximately 230m from the nearest watercourse, the Klipdrif River.

According to the Botanical Impact Assessment (**Appendix G1**), although the northern 20 ha still has viable Overberg Sandstone Fynbos present it is the area that has been most affected by invasion of alien plant species and cycles of disturbance such as clearing and leaving fallow with unattended regeneration of the alien shrubs and trees. The fynbos in this area has already been negatively affected and degraded.

The information collected during the vegetation survey clearly indicates that the northern 20 ha would be the preferred area for agricultural development. The impact of the development would be **Medium** due to the level of alien invasive infestation within the area.

(Alternative Site 2)

This is also a potential site located within, and to the south of, the initial 43ha study area. Although closer to the existing irrigation dam, the site is further from the existing access road, and is therefore not preferred by the Applicant.

According to the Botanical Impact Assessment (**Appendix G1**), the development of the southern 20 ha (alternative 2 – not preferred) of the study area would result in **Very High Negative** impacts on the Overberg Sandstone Fynbos since this area is mostly undisturbed Overberg Sandstone Fynbos except for scattered alien invasive species. It is also the only currently known locality of *Serruria* sp. nov. and consequently, it should not be developed before more is known about this species and its distribution.

Alternative 2, although viable, is therefore not preferred, and should not be considered for development.

- (b) **Activity** alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

No activity alternatives have been considered. The Applicant, Napier Berries (Pty) Ltd would like to expand production of blueberries. It is therefore the only viable activity alternative.

- (c) **Design or layout** alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

As discussed above, Alternative 1 is the only viable site alternative due operational requirements and due to the vegetation characteristics of the site.

- (d) **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, or detailed motivation if no reasonable or feasible alternatives exist:

N/A. This application is for the development of Blueberry crops. No technology alternatives that may significantly reduce potential impacts have been assessed

- (e) **Operational** alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

N/A. This application is for development of Blueberry crops, and no operational alternatives considered.

- (f) The option of **not implementing** the activity (the 'No-Go' Option):

This is the option of not developing the site for Blueberry production. The demand for expanded production will therefore not be met.

This would mean that no-development would take place and the proposed site will remain as is.

Although this option would result in no potential negative environmental impacts, the socio-economic benefits from implementing the activity would not be achieved.

The no-go option would only have been recommended if it were found that the development of crops and removal of vegetation on this site or in this area might potentially cause substantial detrimental harm to the environment.

According to the Botanical Impact Assessment (**Appendix G1**), in the case of the 'No Go' scenario, the proposed agricultural development would not take place and the *status quo* would persist. In all likelihood, apart from possible action by Working for Water teams there would not be great incentive, apart from the statutory requirement, to remove offending invasive plant species. The site would thus remain much as it is, but with the invasive alien plants continuing to be a source of problems, both in terms of spread and fire management. The result would be High Negative.

- (g) **Other** alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

No other alternatives have been considered

- (h) Provide a **summary** of all alternatives investigated and the outcome of each investigation:

An initial 43ha area was identified on which to develop 19,5ha for Blueberry crops.

Two broad site alternatives have been considered for possible development, the Preferred Alternative (northern part) and Alternative 2 (southern part).

Although both sites would lead to the removal of 19.5ha of fynbos, the Preferred Alternative is expected to have lower negative impact (direct and cumulative) on the Overberg Sandstone Fynbos

- (i) Provide a detailed **motivation for not further considering** the alternatives that were found not feasible and reasonable, including a description and proof of the investigation of those alternatives:

No other site alternatives were considered, as the only available areas are the two sites discussed above.

## 2. PREFERRED ALTERNATIVE

- (a) Provide a **concluding statement** indicating the preferred alternative(s), including preferred location, site, activity and technology for the development.

The Preferred site Alternative (Alternative 2), although not the only viable site option available for the Applicant, is preferred as it is adjacent to the existing berry crops and closer to the existing access roads, reducing transport and management costs for the Applicant.

The preferred site is also preferred from a botanical perspective as it is expected to have a lower negative impact (direct and cumulative) on the Overberg Sandstone Fynbos. According to the Botanical Impact Assessment, although the site still has viable Overberg Sandstone Fynbos present it is the area that has been most affected by invasion of alien plant species and cycles of disturbance such as clearing and leaving fallow with unattended regeneration of the alien shrubs and trees. The fynbos in this area has already been negatively affected and degraded.

## SECTION F: ENVIRONMENTAL ASPECTS ASSOCIATED WITH THE ALTERNATIVES

**Note:** The information in this section must be DUPLICATED for all the feasible and reasonable ALTERNATIVES.

### 1. DESCRIBE THE ENVIRONMENTAL ASPECTS ASSOCIATED WITH THE PROPOSED DEVELOPMENT AND ITS ALTERNATIVES, FOCUSING ON THE FOLLOWING:

(a) Geographical, geological and physical aspects:

According to CapeFarmMapper, the soils consists of rocky areas with limited, miscellaneous soils. The Geology consists of Quartzitic sandstone and subordinate shale of the Table Mountain Group.

According to the Botanical Impact Assessment (**Appendix G1**), the entire site lies on sandstone sediments of the Nardouw Subgroup of the Table Mountain Group. The orthoquartzitic sandstones have over millennia given rise to well-drained, leached and consequently nutrient-poor (oligotrophic) soils. No clay-rich soils derived from shale are found anywhere on the site.

According to the Freshwater Verification (**Appendix G2**), the proposed development is located approximately 230m east of the Klipdrif River. No other watercourses were identified in the study or investigation areas. The proposed development is not expected to have any significant direct or indirect impacts on any watercourses.

(b) Ecological aspects:

Will the proposed development and its alternatives have an impact on CBAs or ESAs? If yes, please explain: Also include a description of how the proposed development will influence the quantitative values (hectares/percentage) of the categories on the CBA/ESA map.	YES	NO
<p>The <i>2017 Western Cape Biodiversity Spatial Plan</i> (CapeNature, 2017) assigns CBA2 and ESA2 conservation planning categories to the site:</p> <ul style="list-style-type: none"> <li>• CBA2 (Critical Biodiversity Area 2 - Terrestrial): Approximately 60% of the preferred site.</li> <li>• ESA (Ecological Support Area): Remaining 40% of the preferred site.</li> </ul> <p>CBA2 - Areas in a degraded or secondary condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.</p> <p>ESA – Areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of Pas or CBAs, and that are often vital for delivering ecosystem services.</p> <p><u>However</u>, according to the Botanical Impact Assessment (<b>Appendix G1</b>), the situation in the study area is a good example of where the information gathered in the field provides the opposite. It is acknowledged that the study area has been negatively affected by alien invasive species but all records in this study show that the vegetation is the same type with mostly the same species throughout. The northern area has been altered by the effect of alien invasion, physical clearing and re-invasion by alien plant species. This has had a negative impact on the northern part of the study area in contrast to the southern part that is largely intact and not as strongly negatively impacted as the northern part. Consequently, it is the view of the specialist that the biodiversity map for the area in question should appear as redrafted (refer to Figure 18 below), where the northern part is mapped as ESA1 and the southern part as CBA2 (it could even be as high as CBA1 ! ).</p> <p>The Preferred Alternative is located on more of the ESA1, with approximately 35% being within the CBA2.</p> <p>The Alternative 2 site is located entirely within CBA2.</p>		



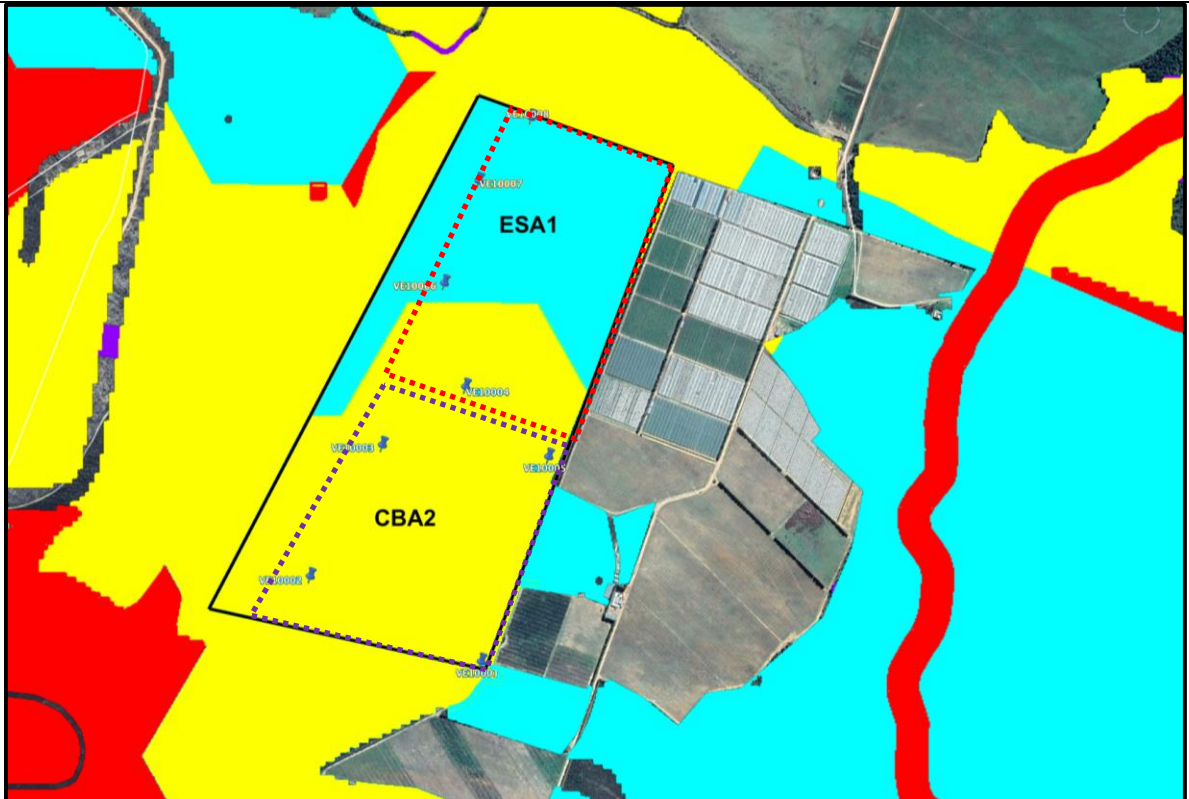


Figure 8: Google Earth image with modified Western Cape Biodiversity Spatial Plan map superimposed over the Vierfontein study area and surrounds. The red shading indicates Critical Biodiversity Areas (1); the yellow shading represents Critical Biodiversity Areas (2); the light blue shading represents Ecological Support Areas (1) and the purple areas indicate Ecological Support Areas (2). The preferred alternative is indicated by the red dashed polygon, and Alternative 2 with the purple dashed polygon (**Figure 43 of Appendix G1**).

Will the proposed development and its alternatives have an impact on terrestrial vegetation, or aquatic ecosystems (wetlands, estuaries or the coastline)?  
If yes, please explain:

YES NO

According to the Botanical Impact Assessment (**Appendix G1**), the site is located in an area of Overberg Sandstone Fynbos (Critically Endangered).

#### Preferred Site (Alternative 1)

According to the Botanical Impact Assessment (**Appendix G1**), although the northern 20 ha still has viable Overberg Sandstone Fynbos present it is the area that has been most affected by invasion of alien plant species and cycles of disturbance such as clearing and leaving fallow with unattended regeneration of the alien shrubs and trees. The fynbos in this area has already been negatively affected and degraded.

The information collected during the vegetation survey clearly indicates that the northern 20 ha would be the preferred area for agricultural development. The impact of the development would be **Medium** due to the level of alien invasive infestation within the area.

#### (Alternative Site 2)

According to the Botanical Impact Assessment (**Appendix G1**), the development of the southern 20 ha (alternative 2 – not preferred) of the study area would result in **Very High Negative** impacts on the Overberg Sandstone Fynbos since this area is mostly undisturbed Overberg Sandstone Fynbos except for scattered alien invasive species. It is also the only currently known locality of *Serruria* sp. nov. and consequently, it should not be developed before more is known about this species and its distribution.



Will the proposed development and its alternatives have an impact on any populations of threatened plant or animal species, and/or on any habitat that may contain a unique signature of plant or animal species? If yes, please explain:	YES	NO
See above.		

Describe the manner in which any other biological aspects will be impacted:		
Due to the nature and location of the development, no other significant biological impacts are expected.		
Will the proposed development also trigger section 63 of the NEM: ICMA?	YES	NO
<p>If yes, describe the following:</p> <p>(i) the extent to which the applicant has in the past complied with similar authorisations;</p> <p>(ii) whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development proposal or listed activity is consistent with the purpose for establishing and protecting those areas;</p> <p>(iii) the estuarine management plans, coastal management programmes, coastal management lines and coastal management objectives applicable in the area;</p> <p>(iv) the likely socio-economic impact if the listed activity is authorised or is not authorised;</p> <p>(v) the likely impact of coastal environmental processes on the proposed development;</p> <p>(vi) whether the development proposal or listed activity—</p> <p>(a) is situated within coastal public property and is inconsistent with the objective of conserving and enhancing coastal public property for the benefit of current and future generations;</p> <p>(b) is situated within the coastal protection zone and is inconsistent with the purpose for which a coastal protection zone is established as set out in section 17 of NEM: ICMA;</p> <p>(c) is situated within coastal access land and is inconsistent with the purpose for which coastal access land is designated as set out in section 18 of NEM: ICMA;</p> <p>(d) is likely to cause irreversible or long-lasting adverse effects to any aspect of the coastal environment that cannot satisfactorily be mitigated;</p> <p>(e) is likely to be significantly damaged or prejudiced by dynamic coastal processes;</p> <p>(f) would substantially prejudice the achievement of any coastal management objective; or</p> <p>(g) would be contrary to the interests of the whole community;</p> <p>(vii) whether the very nature of the proposed activity or development requires it to be located within coastal public property, the coastal protection zone or coastal access land;</p> <p>(viii) whether the proposed development will provide important services to the public when using coastal public property, the coastal protection zone, coastal access land or a coastal protected area; and</p> <p>(ix) the objects of NEM: ICMA, where applicable.</p>		
N/A		

(c) Social and Economic aspects:

What is the expected capital value of the project on completion?	R36,000,000
What is the expected yearly income or contribution to the economy that will be generated by or as a result of the project?	R38,000,000
Will the project contribute to service infrastructure?	YES NO
Is the project a public amenity?	YES NO
How many new employment opportunities will be created during the development phase?	80 jobs
What is the expected value of the employment opportunities during the development phase?	R5,000,000
What percentage of this will accrue to previously disadvantaged individuals?	90 %
How will this be ensured and monitored (please explain):	
<p>A strict employment process is followed in line with the Employment Equity plan and report that is submitted annually. The recruitment team is adhering to the Equity requirements and their adherence is reported to the CEO on a quarterly basis.</p> <p>Non-adherence to the EE Act may result in severe fines and it will influence our BBBEE rating negatively. This is in addition to our policy to uplift the surrounding community.</p>	
How many permanent new employment opportunities will be created during the operational phase of the project?	25
What is the expected current value of the employment opportunities during the first 10 years?	R18,000,000
What percentage of this will accrue to previously disadvantaged individuals?	90 %

How will this be ensured and monitored (please explain):

A strict employment process is followed in line with the Employment Equity plan and report that is submitted annually. The recruitment team is adhering to the Equity requirements and their adherence is reported to the CEO on a quarterly basis.

Non-adherence to the EE Act may result in severe fines and it will influence our BBBEE rating negatively. This is in addition to our policy to uplift the surrounding community.

Any other information related to the manner in which the socio-economic aspects will be impacted:

According to the Applicant, apart from creating much needed employment, working in a sustainable industry is conducive and will create stability in the family, education and lessen the dependency on alcohol.

(d) Heritage and Cultural aspects:

According to the Heritage Western Cape NID response (**Appendix E1**), the proposed development is not expected to impact on any heritage resources.

## 2. WASTE AND EMISSIONS

(a) Waste (including effluent) management

Will the development proposal produce waste (including rubble) during the development phase?	YES	NO
If yes, indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type?	m <sup>3</sup>	
The proposed development is not expected to produce any significant waste during the development phase.		
Cleared alien vegetation will need to be removed from the site and disposed of at an appropriate site.		

Will the development proposal produce waste during its operational phase?	YES	NO
If yes, indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type?	m <sup>3</sup>	
The proposed development is not expected to produce any significant waste during the operational phase.		

Will the development proposal require waste to be treated / disposed of on site?	YES	NO
If yes, indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type per phase of the proposed development to be treated/disposed of?	m <sup>3</sup>	
N/A		
If no, where and how will the waste be treated / disposed of? Please explain. Indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type per phase of the proposed development to be treated/disposed of?	m <sup>3</sup>	
N/A		
Has the municipality or relevant authority confirmed that sufficient capacity exists for treating / disposing of the waste to be generated by the development proposal? If yes, provide written confirmation from the municipality or relevant authority. N/A	YES	NO
Will the development proposal produce waste that will be treated and/or disposed of at another facility other than into a municipal waste stream?	YES	NO
If yes, has this facility confirmed that sufficient capacity exists for treating / disposing of the waste to be generated by the development proposal? Provide written confirmation from the facility. N/A	YES	NO

Does the facility have an operating license? (If yes, please attach a copy of the licence.)		YES	NO
Facility name:			
Contact person:			
Cell:	Postal address:		
Telephone:	Postal code:		
Fax:	E-mail:		

Describe the measures that will be taken to reduce, reuse or recycle waste:
N/A.

(b) Emissions into the atmosphere

Will the development proposal produce emissions that will be released into the atmosphere?	YES	NO
If yes, does this require approval in terms of relevant legislation?	YES	NO
If yes, what is the approximate volume(s) of emissions released into the atmosphere?		m <sup>3</sup>
Describe the emissions in terms of type and concentration and how these will be avoided/managed/treated/mitigated:		
N/A.		

### 3. WATER USE

(a) Indicate the source(s) of water for the development proposal by highlighting the appropriate box(es).

Municipal	Water board	Groundwater	River, Stream, Dam or Lake	Other	The project will not use water
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**Note:** Provide proof of assurance of water supply (e.g. Letter of confirmation from the municipality / water user associations, yield of borehole)

(b) If water is to be extracted from a groundwater source, river, stream, dam, lake or any other natural feature, please indicate the volume that will be extracted per month:	Peak water demand (summer) =	33 600m <sup>3</sup> /month
	Low water demand (winter) =	9 600m <sup>3</sup> /month

(c) Does the development proposal require a water use permit / license from DWS?	YES	NO
If yes, please submit the necessary application to the DWS and attach proof thereof to this application as an Appendix.		

(d) Describe the measures that will be taken to reduce water demand, and measures to reuse or recycle water:
The blueberry plants will be directly irrigated through drip irrigation, which will be monitored.

### 4. POWER SUPPLY

(a) Describe the source of power e.g. municipality / Eskom / renewable energy source.

N/A.
------

(b) If power supply is not available, where will power be sourced?

N/A.
------

## 5. ENERGY EFFICIENCY

- (a) Describe the design measures, if any, that have been taken to ensure that the development proposal will be energy efficient:

N/A.

- (b) Describe how alternative energy sources have been taken into account or been built into the design of the project, if any:

N/A.

## 6. TRANSPORT, TRAFFIC AND ACCESS

Describe the impacts in terms of transport, traffic and access.

No impacts in terms of transport, traffic and access are expected. Existing farm roads will be used.

## 7. NUISANCE FACTOR (NOISE, ODOUR, etc.)

Describe the potential nuisance factor or impacts in terms of noise and odours.

The proposed activity is not expected to create any significant potential nuisance, noise or odours. The proposed development is the establishment of crops adjacent to an existing agricultural area.

**Note:** Include impacts that the surrounding environment will have on the proposed development.

## 8. OTHER

No other impacts are expected.

## SECTION G: IMPACT ASSESSMENT, IMPACT AVOIDANCE, MANAGEMENT, MITIGATION AND MONITORING MEASURES

### 1. METHODOLOGY USED IN DETERMINING AND RANKING ENVIRONMENTAL IMPACTS AND RISKS ASSOCIATED WITH THE ALTERNATIVES

- (a) Describe the **methodology** used in determining and ranking the nature, significance consequences, extent, duration and probability of potential environmental impacts and risks associated with the proposed development and alternatives.

The assessment criteria is based on and described within DEAT (2002) Impact Significance, Integrated Environmental Management, Information Series

- (b) Please describe any gaps in knowledge.

There are no significant gaps of knowledge that have been identified, that may influence the decision on the application by the Competent Authority.

- (c) Please describe the underlying assumptions.

The following assumptions are made:

- The information on which the report is based (i.e. project information), provided by the Applicant and the Specialists, is correct.
- The construction and operation/management of this proposed development will be in line with the recommendations in this report, which will be enforced by the implementation of detailed Environmental Management Programme.

- (d) Please describe the uncertainties.

There are no uncertainties that we are aware of at present.

- (e) Describe adequacy of the assessment methods used.

The Basic Assessment Report for the proposed development is being undertaken with sustainable development as a goal. The assessment looked at the impacts of the proposals on the environment and assesses the significance of these, as well as the possible avoidance of negative impacts. Where negative impacts could not be avoided, mitigation measures have been proposed, to reduce the anticipated impacts to acceptable levels. This is to ensure that the development makes *"equitable and sustainable use of environmental and natural resources for the benefit of present and future generations"*.

### 2. IDENTIFICATION, ASSESSMENT AND RANKING OF IMPACTS TO REACH THE PROPOSED ALTERNATIVES INCLUDING THE PREFERRED ALTERNATIVE WITHIN THE SITE

**Note:** In this section the focus is on the identified issues, impacts and risks that influenced the identification of the alternatives. This includes how aspects of the receiving environment have influenced the selection.

- (a) List the identified impacts and risks for each alternative.

Alternative 1:	for example, choose from: geology / geohydrological / ecological / socio-economic / heritage and cultural-historical / noise / visual / etc.
Alternative 2:	for example, choose from: geology / geohydrological / ecological / socio-economic / heritage and cultural-historical / noise / visual / etc.
Alternative x:	for example, choose from: geology / geohydrological / ecological / socio-economic / heritage and cultural-historical / noise / visual / etc.
No-go Alternative:	

- (b) Describe the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts can be reversed; may cause irreplaceable loss of resources; and can be avoided, managed or mitigated.

The 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 has to select the relevant impacts identified in blue in the table below for each alternative and repeat the table for each impact and risk).

### Please refer to Appendix J

Preferred Alternative	Geology / geohydrological / ecological / socio-economic / heritage and cultural-historical / noise / visual / etc.
<b>PLANNING, DESIGN AND DEVELOPMENT PHASE</b>	
<b>Potential impact and risk:</b>	
Nature of impact:	
Extent and duration of impact:	
Consequence of impact or risk:	
Probability of occurrence:	
Degree to which the impact may cause irreplaceable loss of resources:	
Degree to which the impact can be reversed:	
Indirect impacts:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be avoided:	
Degree to which the impact can be managed:	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Residual impacts:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	

<b>OPERATIONAL PHASE</b>	
<b>Potential impact and risk:</b>	
Nature of impact:	
Extent and duration of impact:	
Consequence of impact or risk:	
Probability of occurrence:	
Degree to which the impact may cause irreplaceable loss of resources:	
Degree to which the impact can be reversed:	
Indirect impacts:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be avoided:	
Degree to which the impact can be managed:	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Residual impacts:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	

<b>DECOMMISSIONING AND CLOSURE PHASE</b>	
<b>Potential impact and risk:</b>	
Nature of impact:	



Extent and duration of impact:	
Consequence of impact or risk:	
Probability of occurrence:	
Degree to which the impact may cause irreplaceable loss of resources:	
Degree to which the impact can be reversed:	
Indirect impacts:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be avoided:	
Degree to which the impact can be managed:	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Residual impacts:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	

**Note:** The EAP may decide to include this section as Appendix J to the BAR.

(c) Provide a summary of the site selection matrix.

**Please refer to Appendix J**

The proposed development is expected to have a Medium - Low negative impact.

(d) Outcome of the site selection matrix.

The following is a summary of the expected impacts (after mitigation)

**Construction phase.**

Botanical Impacts – **Low (Negative)**

Freshwater Impacts – **Very Low (Negative)**

Loss of cultural or historic aspects – **Negligible**

Socio-economic impacts (Job creation) – **Medium (Positive)**

Dust impact - **Low (Negative)**

Visual impact – **Low (Negative)**

Traffic impact – **Very Low (Negative)**

Noise impact – **Low (Negative)**

**Operational Phase**

Botanical Impacts – **Very Low (Negative)**

Freshwater Impacts – **Very Low (Negative)**

Loss of cultural or historic aspects – **Negligible to no impact**

Socio-economic impacts (Job creation) – **Low (Positive)**

Noise impact – **The activity is not expected to have any noise impacts during the operational phase**

Visual impacts – **Low (Negative)**

**Decommissioning**

The project as proposed does not require 'decommissioning' or 'closure', as such the potential impacts thereof is considered irrelevant.

### 3. SPECIALIST INPUTS/STUDIES, FINDINGS AND RECOMMENDATIONS

**Note:** Specialist inputs/studies must be attached to this report as **Appendix G** and must comply with the content requirements set out in Appendix 6 of the EIA Regulations, 2014 (as amended). Also take into account the Department's Circular EADP 0028/2014 (dated 9 December 2014) on the "One Environmental Management System" and the EIA Regulations, 2014, any subsequent Circulars, and guidelines available on the Department's website (<http://www.westerncape.gov.za/eadp>).

Provide a summary of the findings and impact management measures identified in any specialist report and an indication of how these findings and recommendations have been included in the BAR.

According to the Botanical Assessment (**Appendix G1**), The vegetation found on Portion 3 of farm Vierfontein 143, Bredasdorp, is Overberg Sandstone Fynbos but has its own local character with localized endemic species. For this reason, as much of the fynbos as possible should be conserved. However, at the same time, reasonable demands of land for agriculture should be considered. This is often challenging and the outcome of studies such as this may not please all parties. It is the botanical specialists firm recommendation that the cultivation of the Northern 20 ha should be permitted with the strict proviso that a commitment is made to conserving and actively managing the remaining parts of Portion 3 of farm Vierfontein 143 as part of a meaningful win-win scenario where conservation of the Critically Endangered Overberg Sandstone Fynbos will benefit as well.

The recommended mitigation is that the alien invasive plant species, *Pinus radiata*\*, *Leptospermum laevigatum*\*, *Acacia longifolia*\*, *Acacia saligna*\* and *Hakea sericea*\* should be systematically cleared and removed from the entire part of Portion 3 of Vierfontein 143 i.e. the southern part of the study area and beyond to the higher altitude parts of Portion 3. It is essential that the wood, including all branches, should be removed from the fynbos and destroyed at a designated dumpsite.

The mitigation described above would compensate for the loss of the 20 ha of degraded fynbos in the northern part of the study area and would contribute positively to the efforts of the Napier Mountain Conservancy aimed at eradicating the alien vegetation in the catchments of the Groot Sanddrif River. The implementation of this mitigation that should be conditional to issuing Environmental Authorisation.

In addition to the above, a conservation management plan should be drawn up in conjunction with the Napier Mountain Conservancy, to promote the care of the land within this farm portion as part of a community effort to take responsibility for the natural environment around Napier. It is imperative that a monitoring programme to monitor alien invasion should form part of the management plan. When aliens are encountered, they must be systematically removed.

According to the Heritage Notice of Intent to Develop (**Appendix E1**), the area straddles the uppermost two formations of the Table Mountain Group, viz. the Skurweberg and Rietvlei formations, of LOW/BLOCK and HIGH/ORANGE palaeosensitivities, respectively (SAHRIS Palaeomap). Although this interval of strata is fossiliferous, the rich fossil content occurs further north where deformation of the Cape Fold Belt is less intense. These strata in the south are not distinguished by well-preserved fossil content. Furthermore, deep weathering during the Cenozoic has degraded the fossils in the subsurface. Due to deformation and weathering the fossil potential/sensitivity is low. The surficial disturbance of the weathered soils by agricultural activity is unlikely to impact upon palaeontological resources.

There is a possibility of a few stone tools of low archaeological significance. Impacts on heritage resources is likely to be very low.

Heritage Western Cape in response, dated 15 October 2019, confirmed that no further heritage studies was required since there is no reason to believe that the proposed development will impact on heritage resources. No further action in terms of Section 38 of NHRA is required (See **Appendix E1**).

The proposed development is not expected to have any significant impacts on any aquatic ecosystems. The freshwater verification (**Appendix G2**) concluded that as the proposed development is located approximately 230m east of the identified watercourse (the Klipdrif River) and not within any associated legislative regulated zones, no further authorisation from a freshwater ecological perspective is required for the proposed development.

#### 4. ENVIRONMENTAL IMPACT STATEMENT

Provide an environmental impact statement of the following:

(i) A summary of the key findings of the EIA.		
<p>See Section G.3 above.</p> <p>No significant negative environmental impacts are expected, although a Medium (without mitigation) to Low (with mitigation) can be expected in terms of loss of Overberg Sandstone Fynbos.</p> <p>The expected positive benefits of the proposed development (job creation and expansion of Napier berries blueberry production) are expected to exceed the negative impacts.</p>		
<p>(ii) Has a map of appropriate scale been provided, 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 buffers?</p> <p>See Figures 9, and Figure 11 of the Botanical Impact Assessment (<b>Appendix G1</b>).</p>	YES	NO
<p>(iii) A summary of the positive and negative impacts that the proposed development and alternatives will cause in the environment and community.</p> <p><b>Positive Impacts</b></p> <ul style="list-style-type: none"> <li>- The proposed development will create jobs during the construction and operational phases, most of which will be for previously disadvantaged individuals</li> <li>- Napier Berries will be able to expand their blueberry production, making the operation more sustainable</li> <li>- The proposed development will allow for the removal of alien vegetation, not only from the site, but adjacent to the site, and over a greater area on the farm</li> </ul> <p><b>Negative Impacts</b></p> <ul style="list-style-type: none"> <li>- The proposed development will have a Low negative impact as a result of the removal of natural vegetation as well as the loss of ecological processes</li> <li>- The proposed development is not expected to have any significant negative impact on freshwater resources, or heritage resources on site.</li> <li>- The proposed development will have a Low negative visual impact on the area surrounding Napier.</li> </ul>		

#### 5. IMPACT MANAGEMENT, MITIGATION AND MONITORING MEASURES

- (a) Based on the assessment, describe the impact management, mitigation and monitoring measures as well as the impact management objectives and impact management outcomes included in the EMPr. The EMPr must be attached to this report as Appendix H.

The recommended mitigation is that the alien invasive plant species, *Pinus radiata*\*, *Leptospermum laevigatum*\*, *Acacia longifolia*\*, *Acacia saligna*\* and *Hakea sericea*\* should be systematically cleared and removed from the entire part of Portion 3 of Vierfontein 143 i.e. the southern part of the study area and beyond to the higher altitude parts of Portion 3. It is essential that the wood, including all branches, should be removed from the fynbos and destroyed at a designated dumpsite.

The mitigation described above would compensate for the loss of the 20 ha of degraded fynbos in the northern part of the study area and would contribute positively to the efforts of the Napier Mountain Conservancy aimed at eradicating the alien vegetation in the catchments of the Groot Sanddrif River. The implementation of this mitigation that should be conditional to issuing Environmental Authorisation.

In addition to the above, a conservation management plan should be drawn up in conjunction with the Napier Mountain Conservancy, to promote the care of the land within this farm portion as part of a community effort to take responsibility for the natural environment around Napier. It is imperative that a monitoring programme

to monitor alien invasion should form part of the management plan. When aliens are encountered, they must be systematically removed.

- (b) Describe any provisions for the adherence to requirements that are prescribed in a Specific Environmental Management Act relevant to the listed activity or specified activity in question.

None

- (c) Describe the ability of the applicant to implement the management, mitigation and monitoring measures.

Under South African environmental legislation, the Applicant / Employer is accountable for the potential impacts of the activities that are undertaken and is responsible for managing these impacts. Napier Berries (Pty) Ltd as the Applicant / Employer therefore has overall and total environmental responsibility to ensure that the implementation of the construction phase of this EMP complies with the relevant legislation and the conditions of the environmental authorisation.

The developer will be responsible for the development and implementation of the conditions of the Environmental Authorisation in terms of the design of the development and construction thereof. The developer will thus be responsible for the implementation of this EMP.

The applicant has shown commitment to implement management, mitigation and monitoring measures as specified in the recommendations in and the EMP.

- (d) Provide the details of any financial provisions for the management of negative environmental impacts, rehabilitation and closure of the proposed development.

Sufficient financial provisions must be made by Napier Berries (Pty) Ltd for the removal and disposal of alien vegetation from the site, and adjacent areas on the farm, as per the recommendations of the Botanical Impact Assessment. This must also include long-term management of alien vegetation on the farm.

Financial provision must also be made for the compilation of a conservation management plan, as well as for complying with any recommendations and management activities described in the conservation management plan.

- (e) Provide the details of any financial provisions for the management of negative environmental impacts, rehabilitation and closure of the proposed development.

See above

- (f) Describe any assumptions, uncertainties, and gaps in knowledge which relate to the impact management, mitigation and monitoring measures proposed.

The following assumptions are made:

- The information on which the report is based (i.e. project information) is correct.
- The construction and management of this proposed development will be in line with the recommendations in this report, which will be enforced by the implementation of detailed Environmental Management Plan. Much of the long-term success lies in the effective implementation of the measures prescribed in the Environmental Management Programme.

There are no significant gaps of knowledge that have been identified.

There are no uncertainties that we are aware of at present.

## SECTION H: RECOMMENDATIONS OF THE EAP AND SPECIALISTS

(a) In my view as the appointed EAP, the information contained in this BAR and the documentation attached hereto is sufficient to make a decision in respect of the listed activity(ies) applied for.	YES	NO
(b) If the documentation attached hereto is sufficient to make a decision, please indicate below whether, in your opinion, the listed activity(ies) should or should not be authorised:		
Listed activity(ies) should be authorised:	YES	NO
Provide reasons for your opinion		
<p>The proposed development is needed as according to the Applicant, the farm has no commercial operation, therefor not a sustainable production unit and with available water source from the Vierfontein dam, access to a sustainable farming solution, an opportunity exists where a small portion of the farm can be used to create a sustainable business that will create much needed jobs and the opportunity to manage aliens on the rest of the farm</p> <p>The proposed development would result in loss of approximately 19.5 ha of vegetation within Critically Endangered Overberg Sandstone Fynbos. According to the Botanical Impact Assessment (<b>Appendix G1</b>), the loss of 19.5 ha of Overberg Sandstone Fynbos on the northern slopes of the Soetmuisberg would be negative wherever it occurred, particularly in view of having found an undescribed no-doubt endemic species of <i>Serruria</i> and the likelihood of more endemic species present. On balance, however, development of the northern 20 ha is acceptable if mitigation measures are applied.</p> <p>The recommended mitigation is that the alien invasive plant species, <i>Pinus radiata</i>*, <i>Leptospermum laevigatum</i>*, <i>Acacia longifolia</i>*, <i>Acacia saligna</i>* and <i>Hakea sericea</i>* should be systematically cleared and removed from the entire part of Portion 3 of Vierfontein 143 i.e. the southern part of the study area and beyond to the higher altitude parts of Portion 3.</p> <p>The mitigation described above would compensate for the loss of the 20 ha of degraded fynbos in the northern part of the study area and would contribute positively to the efforts of the Napier Mountain Conservancy aimed at eradicating the alien vegetation in the catchments of the Groot Sanddrif River.</p> <p>The proposed development is unlikely to impact significantly on freshwater resources.</p> <p>The proposed development is expected to have a very low likelihood of negatively impacting on significant archaeological or palaeontological heritage aspects.</p> <p>Due to the nature of the development, the site and the surrounding land-uses, the proposed development is expected to have a low negative impact on the visual character of the area.</p> <p>The proposed development is expected to create an additional 80 job opportunities during the development phase, and approximately 25 additional job opportunities during the operational phase, 90% of which will go to previously disadvantaged individuals.</p> <p><b>Considering all the information, it is not envisaged that this proposed development will have a significant negative impact on the environment, besides the removal of 19.5ha of Overberg Sandstone Fynbos, which is acceptable if mitigation measures are applied.</b></p>		
(c) Provide a description of any aspects that were conditional to the findings of the assessment by the EAP and Specialists which are to be included as conditions of authorisation.		
<ul style="list-style-type: none"> <li>- Removal of alien vegetation from the site and rest of the farm adjacent to the development site.</li> <li>- A conservation management plan should be drawn up in conjunction with the Napier Mountain Conservancy, to promote the care of the land within this farm portion as part of a community effort to take responsibility for the natural environment around Napier. It is imperative that a monitoring programme to monitor alien invasion should form part of the management plan. When aliens are encountered, they must be systematically removed.</li> </ul>		
(d) If you are of the opinion that the activity should be authorised, please provide any conditions, including mitigation measures that should in your view be considered for inclusion in an environmental authorisation.		
Compliance with the EMP and appointment of an ECO during the construction phase.		



(e) Please indicate the recommended periods in terms of the following periods that should be specified in the environmental authorisation:		
i.	the period within which commencement must occur;	5 years
ii.	the period for which the environmental authorisation is granted and the date on which the development proposal will have been concluded, where the environmental authorisation does not include operational aspects;	10 years
iii.	the period for which the portion of the environmental authorisation that deals with non-operational aspects is granted; and	N/A
iv.	the period for which the portion of the environmental authorisation that deals with operational aspects is granted.	Indefinite

## SECTION I: APPENDICES

The following appendices must be attached to this report:

APPENDIX		Confirm that Appendix is attached
Appendix A:	Locality map	X
Appendix B:	Site development plan(s)	X
	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;	X
Appendix C:	Photographs	X
Appendix D:	Biodiversity overlay map	X
Appendix E:	Permit(s) / license(s) from any other Organ of State, including service letters from the municipality.	X
	Appendix E1: Copy of comment from HWC.	X
Appendix F:	Public participation information: including a copy of the register of I&APs, the comments and responses report, proof of notices, advertisements and any other public participation information as is required in Section C above.	X
Appendix G:	Specialist Report(s)	X
Appendix H :	EMPr	X
Appendix I:	Additional information related to listed waste management activities (if applicable)	
Appendix J:	If applicable, description of the impact assessment process followed to reach the proposed preferred alternative within the site.	X
Appendix K:	Any Other (if applicable).	X

## SECTION J: DECLARATIONS

### THE APPLICANT

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

I ....., in my personal capacity or duly authorised thereto, hereby declare/affirm all the information submitted as part of this Report is true and correct, and that I –

- am aware of and understand the content of this report;
- am fully aware of my responsibilities in terms of the NEMA, the EIA Regulations in terms of the NEMA (Government Notice No. R. 982, refers) (as amended) and any relevant specific environmental management Act and that failure to fulfil these requirements may constitute an offence in terms of relevant environmental legislation;
- have provided the EAP and Specialist, Review EAP (if applicable), and Review Specialist (if applicable), and the Competent Authority with access to all information at my disposal that is relevant to the application;
- will be responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority;
- will be responsible for the costs incurred in complying with the conditions that may be attached to any decision(s) issued by the Competent Authority;

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

Signature of the Applicant:

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Name of Organisation:

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Date:

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## THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

I ....., as the appointed EAP hereby declare/affirm:

- the correctness of the information provided as part of this Report;
- that all the comments and inputs from stakeholders and I&APs have been included in this Report;
- that all the inputs and recommendations from the specialist reports, if specialist reports were produced, have been included in this Report;
- any information provided by me to I&APs and any responses by me to the comments or inputs made by I&APs;
- that I have maintained my independence throughout this EIA process, or if not independent, that the review EAP has reviewed my work (Note: a declaration by the review EAP must be submitted);
- that I have throughout this EIA process met all of the general requirements of EAPs as set out in Regulation 13;
- I have throughout this EIA process disclosed to the applicant, the specialist (if any), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any report, plan or document prepared as part of the application;
- have ensured that information containing all relevant facts in respect of the application was distributed or was made available to I&APs and that participation by I&APs was facilitated in such a manner that all I&APs were provided with a reasonable opportunity to participate and to provide comments;
- have ensured that the comments of all I&APs were considered, recorded and submitted to the Department in respect of the application;
- have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, if specialist inputs and recommendations were produced;
- have kept a register of all I&APs that participated during the PPP; and
- am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (as amended).

Signature of the EAP: \_\_\_\_\_

Name of Company: \_\_\_\_\_

Date: \_\_\_\_\_

## THE REVIEW ENVIRONMENTAL ASSESSMENT PRACTITIONER

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

- that I have reviewed all the work produced by the EAP;
- the correctness of the information provided as part of this Report;
- that I have, throughout this EIA process met all of the general requirements of EAPs as set out in Regulation 13;
- I have, throughout this EIA process disclosed to the applicant, the EAP, the specialist (if any), the review specialist (if any), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any report, plan or document prepared as part of the application; and
- am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (as amended).

Signature of the  
Review EAP:

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Name of Company:

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Date:

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## THE SPECIALIST

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

I ....., as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that I :

- in terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- in terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any report, plan or document prepared or to be prepared as part of the application; and
- am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (as amended).

Signature of the Specialist:

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Name of Company:

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Date:

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## THE REVIEW SPECIALIST

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

- that I have reviewed all the work produced by the Specialist(s);
- the correctness of the specialist information provided as part of this Report;
- that I have, throughout this EIA process met all of the general requirements of specialists as set out in Regulation 13;
- I have, throughout this EIA process disclosed to the applicant, the EAP, the review EAP (if applicable), the Specialist(s), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any report, plan or document prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (as amended).

Signature of Review Specialist:

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Name of Company:

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Date:

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