

**FINAL BASIC ASSESSMENT REPORT FOR THE PROPOSED  
DEVELOPMENT ON THE REMAINING EXTENT OF PORTION 39 OF  
THE FARM DE RUST 12 JU, HAZYVIEW**

**MDARDLEA REFERENCE NUMBER: 1/3/1/16/1E-334**

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Prepared for:  
**Comosmart (Pty) Ltd**

Compiled by:

***launch***

LANDSCAPE ARCHITECTURE & ENVIRONMENTAL PLANNING

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## 1 INTRODUCTION

The applicant, Comosmart (Pty) Ltd, is proposing a development on the Remaining Extent of Portion 39 of the Farm De Rust 12 JU, Hazyview ("The Site") within the Mbombela Local Municipality, Ehlanzeni District Municipality, Mpumalanga (**Figure 1**). The Site co-ordinates for the centre of the site are 25°3'20.76"S and 31°7'46.52"E.

The size of the site is 3,6953 hectares and the development footprint is proposed to be approximately 17000m<sup>2</sup> in extent. The development therefore involves the clearing of more than 1 hectare of indigenous vegetation, which is an activity identified in terms of the National Environmental Management Act, 2014 EIA regulations, as amended, as having a potential detrimental impact on the environment and as such an Environmental Authorisation (EA) is required prior to any activity taking place.

The site is located along the R40 just south of the town centre of Hazyview and within close proximity to a service station and small retail centre. The site is currently zoned for agricultural purposes and has some small businesses operating from it, namely, small sawmill, construction equipment hire, aluminium and glass supply, fire safety supply. The surrounding properties include agriculture to the north and east, natural vacant land to the south and hospitality and tourism (bed and breakfast) to the west. Refer to **Figure 2** for an aerial photograph indicating existing buildings and infrastructure as well as surrounding land uses.

The vegetation on the site is classified as Pretoriuskop Sour Bushveld (SVI10) of the Lowveld Bioregion which conservation status is "Least Threatened" (Mucina, Rutherford, and Powrie 2006).

Launch Landscape Architecture and Environmental Planning (Launch) was appointed by Comosmart (Pty) Ltd to act as independent environmental assessment practitioners. This report is compiled as part of an application made to the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (MDARDLEA): the decision-making authority, for undertaking an activity, listed in terms of the National Environmental Management Act (NEMA, Act 107 of 1998) Government notices no. R 324-327 of 17 April 2017. The EA application was submitted to the MDARLEA and has been assigned reference number 1/3/1/06/1E-334.

The proposed development will be informed by ecological and environmental aspects which have been identified in this assessment. Any recommendations which are provided in this Basic

Assessment Report have been generated by ecological and environmental specialists who recognize the importance of ecological integrity and optimal ecosystem functionality. Furthermore, the provided recommendations are aimed at reducing the impact which any developmental activities may have on the receiving environment and vice versa, and have been generated in accordance with the National Environmental Management Principles to ensure the mitigation of any possible impacts and promote sustainability.

The relevant legislation which is applicable to the proposed developmental activities is discussed in section 4 of this report.



Figure 1: Locality Map indicating the site boundary in red. Source: Google Earth.

## 1.1 SCOPE AND DESCRIPTION OF PROPOSED ACTIVITIES

The development will mainly consist of service retail, nursery, tourist facilities and warehouse facilities and will consist of only a few erven. The land uses that will be accommodated on the development will include:

- Nursery (including a coffee shop);
- Office facilities;
- Service retail shops (i.e. hair salon, beauty salon, etc.);
- Tourist facilities (i.e. restaurant, curio shop, etc.) and
- Warehouse facilities (light industry i.e. Coastal Hire, etc.)

A Township Establishment application is required to accommodate the new proposed land uses and zonings. Eliakim Development Projects was appointed to handle the process and an application has been submitted in terms of Section 51 of the Mbombela Spatial Planning and Land Use Management By-Law, 2019 for the township establishment on the property. The application includes the following land uses and zoning:

**Table 1: Proposed land uses applied for in terms of the Township Establishment application.**

	Zoning	Land Use	Erf No	Area (ha)	% of site	Number of Erven
1	"Industrial"	Purposes of service retail and warehouse and packaging	1	1,0846	29,35%	1
2	"Tourism"	Place of Refreshment and tourist facilities	2	1,3828	37,42%	1
3	"Business"	Purposes of Place of Refreshment, Service retail, Office and Nursery	3	0,4741	12,83%	1
4	"Open Space"	Private Open Space	1	0,1101	2,98%	1
5	"Transportation"	Private Access road and access control	1	0,1846	5,00%	1
6	"Transportation"	Public access road		0,4591	12,42%	
<b>Total</b>				<b>3,6953</b>	<b>100,00%</b>	<b>5</b>

Refer to **Annexure A** for the proposed site layout plan. The estimated project footprint is 17000m<sup>2</sup>. A large area along the eastern side of the site is already transformed with operating businesses. These buildings and structures, as well as indigenous vegetation in the central and northern parts of the site,

will be removed to accommodate the proposed layout (Refer to **Figure 2** below as well as **Annexure B** for site photographs).



*Figure 2: Satellite Image indicating the extent of the site and existing buildings and infrastructure.*

*Source: Google Earth.*

Mbombela Local Municipality is the service provider in the area. Refer to **Annexure C** for the Civil Services Report. Services supply and infrastructure are summarized in the report as follows:

Purified **water** will be obtained from the Mbombela Local Municipality and connection is technically possible with any required upgrades to be funded from the services contributions payable by the developer.

Bulk **sewerage** is not available adjacent to the development and a new gravity link pipeline of approximately 700m must be installed to connect the development to the municipal infrastructure.

**Roads** will be designed according to the relevant standards and the “Guidelines for Human Settlement Planning and Design”. Structural requirements will be as per the “South African Trip Generation Rates”.

The **internal water and sewer infrastructure** will be provided by the developer. All link lines to connect to the existing infrastructure will be provided by the developer. Any upgrades to the existing municipal infrastructure needed will be funded from the bulk service contributions payable to Mbombela Local Municipality.

The developer will provide all **internal roads and storm water infrastructure**. The body corporate/ developer will operate and maintain the internal roads and storm water infrastructure. A services



contribution towards roads & storm water is payable and will be calculated by the Mbombela Local Municipality.

**Storm water** will be managed on the new internal roads and underground storm water infrastructure. The removal of storm water from the road surface and the entire development will be via a combination of surface channels and sub-surface storm water pipe network. Currently all the storm water flows to the western side of the site where a gully has formed and continues westwards along the dirt road outside the property. An attenuation dam will be provided in the north-western corner of the site to control the outlet volume of storm water off the property. Refer to **Annexure D** for the proposed stormwater management plan.

There is a 15,74m **right-of-way servitude** registered over the property which runs along the northern boundary of the site and provides access from the R40 to the properties located west and south-west of the property. This right of way servitude has been incorporated in the layout plan.

**Access** to the development will be from the R40. Hamatino Consulting Engineers conducted a traffic impact study dated June 2021 (**Refer to Annexure E**). The primary purpose of the study was to ensure that the access and external road infrastructure to the proposed development is appropriate, safe and will be able to accommodate the anticipated traffic demand in a safe and efficient manner. Following the study Hamatino recommended the following:

- That the development be supported from a traffic engineering point of view;
- That all of the analysed intersections be upgraded in accordance with section 7 of the report;
- That the proposed intersection upgrading be funded from services contributions;
- That the access intersection be constructed as a double lane roundabout, taking cognisance of the future accessibility of this intersection being a future master plan road;
- That the development access shall be designed in such a way as to allow for accessibility towards the west of the proposed development as well and that the access road shall not terminate in the development itself;
- That the existing right of way servitude of 15.74m in width be increased to at least 20m wide up to the western boundary of the application site; and
- That the security access gate be relocated to the property northern boundary and allows for future continuation of the access road.
- That bus lay by be provided in accordance with section 10 of the report.

Although the site and existing activities currently receive **municipal water**, and whilst the civil engineer has indicated that water will be provided by Mbombela for the proposed development, preliminary comments from the City of Mbombela on the townplanning establishment application indicate otherwise. Discussions are therefore underway with the CoM to ascertain municipal water supply. Confirmation of this has not been received as yet.

As an **alternative water source**, there is a **borehole** on site that was used in the past by the previous land owner. As per the engineering report 20,13cbm of water (7347,45cbm per year) is required for the development during operation. This exceeds the amount that is generally authorised as per the National Water Act for the applicable quadrants, which is 45cbm per hectare per year, therefore 166cbm per year for the application site. As such, should groundwater need to be used for the daily water supply for the development, a Water Use License (WUL) will need to be obtained from the Department of Water and Sanitation (DWS).

Furthermore, it is noted that additional mitigation measures have been incorporated into the EMP with regards to water saving technologies to reduce the required water load that has been calculated by the engineer.

## 2 DESCRIPTION OF THE RECEIVING ENVIRONMENT

### CLIMATE

The Pretoriuskop vegetation region has summer rainfall and dry winters. Mean annual precipitation is about 550-800mm. Frost is infrequent. Mean monthly maximum and minimum temperatures are 37.3°C and 5.2°C for October and July, respectively.

### TOPOGRAPHY, GEOLOGY AND SOILS

A Geological Engineering Investigation was undertaken for the site (**Refer to Annexure F**).

As per the investigation a slight spur traverses the site in a north-south direction where the existing buildings are located on the eastern side. This results in natural slopes from this higher part of the site to the north-west and the north-east.

The study area is underlain by potassic Gneiss and Migmatite. This geological body forms part of the basement rock of the Nelspruit Suite falling within the mid-Swazian Period. The study area does not reflect any risk for the formation of sinkholes or subsidence's caused by the presence of water-soluble rocks (dolomite), and as such is not deemed "dolomitic land".

The trenching phase of the investigation indicated that the central to eastern portions of the site were generally blanketed by transported material deemed to be colluvium. Across the far western portions the surface is blanketed by transported material deemed to be alluvium. Across the entire site, the various transported soils were seen to be further underlain by material deemed to be residual Gneiss.

The results of the geotechnical investigation indicate that the site has unique geotechnical characteristics that may require the implementation of specific design and precautionary measures to reduce the risk of structural damage due to adverse geotechnical conditions.

According to the Geological Engineering Investigation the site is deemed suitable for development, provided due cognisance is given to the conclusions and recommendations made therein.



Figure 3: Satellite Image indicating the topography of the site. Source: Engineering Geological Investigation, 6 July 2021.

## HYDROLOGY

The site is located within quaternary catchments X31D and X31K of the Inkomati-Usuthu Water Management Area (WMA).

The drainage nature of the site is linked to its' topography i.e. surface water flows away from the spur landform which acts as a watershed.

There are no natural drainage structures traversing the site. An eroded drainage line has formed along the western side of the site where stormwater flows into and exits the site to the neighbouring properties. Refer to the white dotted line on **Figure 3** for the position of this donga.

The site is not affected by a 1:100 year floodline. Refer to **Annexure A** as signed by the engineer in this regard.

## VEGETATION

The vegetation on the site is classified as Pretoriuskop Sour Bushveld (SVI10) of the Lowveld Bioregion which conservation status is "Least Threatened" (Mucina, Rutherford, and Powrie 2006). Typical Pretoriuskop Sour Bushveld is characterised by open tree savannas in upland areas on gently to moderately undulating terrain with a high diversity of trees and low diversity of shrubs.

An ecological assessment was conducted by ECOREX Consulting Ecologists cc (**Refer to Annexure G**). ECOREX identified two vegetation communities on the site as well as a transformed area (**Refer to Figure 4**). The vegetation units are described by ECOREX as follows:

***Terminalia sericea* – *Pterocarpus angolensis* Disturbed Closed Woodland**

This vegetation community occurs on the southern, western and northern boundaries of the study area. It covers approximately 0.9 hectares, which represents 26% of the entire site. The vegetation structure varies from Short to Tall Closed Woodland. Much of the understory appears to be regularly cleared of shrubs and grass and contains a moderately high density of alien invasive plants. Several graded tracks are also present, as is a deeply eroded gully.

Disturbed Closed Woodland has the higher species richness of the two vegetation communities in the study area. Species fidelity, an indication of community uniqueness, is very high within this community.

***Sclerocarya birrea* – *Terminalia sericea* Degraded Woodland**

This vegetation unit occurs mainly in the eastern and central portions of the study area, adjacent to existing infrastructure. It covers approximately 1.7 ha, which represents 49% of the entire study area.. The vegetation structure varies from Short to Tall Open to Closed Woodland. The canopy layer contains a low diversity of mostly large trees that have been spared from destruction, while most of the understory is either mown or contains various shrub and grass species.

This unit has the lower species list of the two vegetation communities present within the study area. Species fidelity is high.

**Transformed areas**

This includes an area on the eastern portion of the site including the existing entrance on the eastern boundary as well as a small retail centre and sawmill. It makes up the remaining 0.9 ha (25% of the study area).



Figure 4: Vegetation communities and protected species. Source: Terrestrial Ecology Study, June 2021

ECOREX did not record any threatened or near threatened plant species during their fieldwork.

Six protected tree species were identified and mapped on the site (**Refer to Figure 4**). These have been included in the proposed site layout plan (**Annexure A**) as much as possible. Trees that are located on the northern boundary within the warehouse stands will need to be removed due to cut and fill that is required for the platforms. Permits for removal of these trees that cannot be saved will be obtained.

Plant species of conservation concern, confirmed in the general area, have a low likelihood of occurrence due to either a lack of suitable habitat, being highly conspicuous species that are unlikely to be overlooked during fieldwork, adequate coverage of suitable habitat during fieldwork or because they are regionally rare.

No plants endemic to Mpumalanga or any centre of plant endemism were recorded during fieldwork.

Nineteen alien plant species were recorded during fieldwork. These will need to be removed and controlled.

## **FAUNA**

### **Mammals**

Due to the site's location with the peri-urban environment of Hazyview, as well as regular human movement through the site and high noise levels, faunal species on the site are minimal. Only two mammals were confirmed to occur on the site during the fieldwork by ECORES, namely Vervet Monkey and Tree Squirrel. Both of these are common and widespread in savannas in Mpumalanga.

No species of conservation importance or conservation concern or protected species were identified during the fieldwork. Furthermore none are anticipated to potentially occur due to a lack of suitable habitat, high disturbance levels or lack of connectivity to adjacent untransformed areas.

### **Birds**

The site is located approximately 9km west of the Kruger National Park and Adjacent Areas Important Bird and Biodiversity Area (IBA) where a number of threatened species have been recorded. However, most of these species are sensitive to human disturbance and do not occur in the Hazyview area.

One bird species-habitat association was identified by ECOREX on the site, namely the woodland species-habitat, wherein a moderate variety of woodland species were observed.

All of the bird species of conservation concern that might potentially occur in the Hazyview urban area have a Low or Very Low likelihood of occurring within the study area due to a lack of suitable habitat, high human disturbance levels or regional scarcity.

No raptor nests were located within the study area.

## Reptiles and Frogs

Only one reptile was recorded during the fieldwork by ECOREX, namely the Common Dwarf Gecko, which is a widespread species in Mpumalanga.

Neither of the two nationally threatened reptile species occurring in the relevant grid are likely to occur on the site due to a lack of suitable habitat and high human disturbance levels. The Southern African Python is protected under the National Environmental Management: Biodiversity Act (No.10 of 2004) and is likely to occasionally forage within the study area.

No frogs were recorded during the fieldwork by ECOREX, and very few species are expected due to the lack of suitable surface water within the study area.

None of the potentially occurring frog species have a conservation-important status.

## ECOLOGICAL IMPORTANCE

In assessing the ecological importance of the site both the Department of Environmental Affairs' Environmental Screening Tool (EST) and the Mpumalanga Biodiversity Sector Plan (MBSP) were consulted as a background analysis followed by a site specific analysis by ECOREX.

The EST shows the site to have a Medium Sensitivity for Plant, High Sensitivity for Animal and Very High Sensitivity for Terrestrial Biodiversity themes. All of the plant and animal species that have been identified by the EST to possibly occur on site, and the reason for the medium and high sensitivity biodiversity themes, are considered by ECOREX to have a low likelihood of occurring on site. The site is located within a Strategic Water Source Area and within a Freshwater ecosystem priority area quinary catchment. Refer to **Annexure H** for the EST report.

The MBSP classifies the western half and a thin portion of the east of the site as Other Natural Areas. The central-east portion of the site is classified as Heavily or Moderately Modified. The entire site is situated within the Ecological Support Areas (ESA): Protected Area Buffers unit due to its proximity to the Greater KNP, which is a protected area. Refer to **Figure 5** for the MBSP terrestrial assessment.

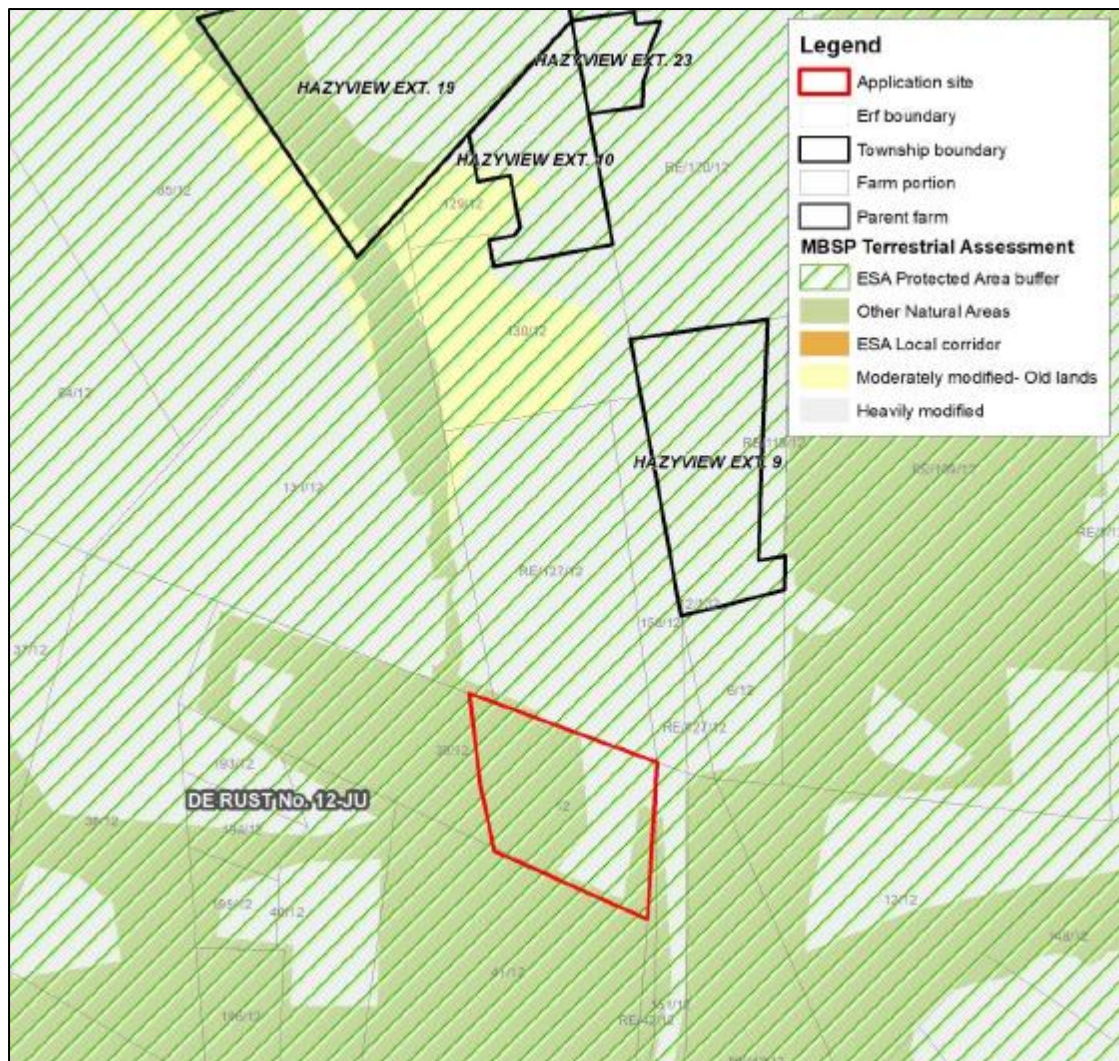


Figure 5: MBSP Terrestrial Assessment of the site. Source: Terrestrial Ecology Study, June 2021

ECOREX has assessed the Disturbed Woodland Community has having a Medium Site Ecological Importance (SEI), the Degraded Woodland has having a Low SEI, and the Transformed area has having a Very Low SEI. Refer to **Figure 6** for the Ecological Importance map of the three communities identified on site.





Figure 6: SEI of the vegetation communities on the site. Source: Terrestrial Ecology Study, June 2021

ECOREX concludes that, provided that the recommendations suggested in their report are followed, and the developer complies with all relevant legislation pertaining to the development activities (such as the NEMBA), **there is no objection to the proposed development in terms of the terrestrial ecosystems of the study area.**

A consolidated site layout plan has been compiled that indicates the proposed town planning zoning, vegetation communities, positions of protected trees and plant species, stormwater management plan and all proposed infrastructure (**Refer to Annexure I**).

### 3 APPLICABLE LEGISLATION

In terms of the National Environmental Management Act (NEMA), EIA Regulations, the activities proposed are regarded as listed activities under the schedule of activities as follows:

#### **GNR 327 – LN1 (Activities requiring a Basic Assessment):**

**Activity #27:** *“The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation...”.*

As the proposed development will result in the removal of more than 1 hectare of indigenous vegetation, it requires a Basic Environmental Assessment in order to obtain environmental authorisation.

The proposed activities may also be subject to regulations contained in other legislation, such as the:

- Constitution of the Republic of South Africa (No 108 of 1996);
- Promotion of Administrative Justice Act (No 3 of 2000)
- Promotion of Access to Information Act (No 2 of 2000);
- National Environmental Management Act (No 107 of 1998);
- National Environmental Management: Waste Act (No 59 of 2008);
- National Environmental Management: Protected Areas Act (No 57 of 2003);
- National Environmental Management: Biodiversity Act (No 10 of 2004);
- Conservation of Agricultural Resources Act (No 43 of 1983);
- National Veld and Forest Fire Act (No 101 of 1998);
- National Water Act (No 36 of 1998);
- National Heritage Resources Act (No 25 of 1999, Section 38); and
- Mpumalanga Nature Conservation Act (No 10 of 1989).

These legislative components will be incorporated into the report where they are applicable.

The Constitution, The PAJA and PAIA deals with people's rights – the right to be heard, obtain information, have an environment that is not harmful and the right to receive fair treatment in the process. This is dealt with in the public participation process in section 5 below.

The NEMA, NEM:PAA, NEM:BA, NEM:WA, NWA, CARA and NVFA deal with people's responsibility to take due care of the environment. This is covered in various sections of this report, the environmental management plan (EMPr) and specialist reports.

The objects of the CARA are "to provide for the conservation of the natural agricultural resources of the Republic by the maintenance of the production potential of land, by the combating and prevention of erosion and weakening or destruction of the water sources, and by the protection of the vegetation and the combating of weeds and invader plants." This is specifically relevant to the site and proposed activities due to the disturbance of soil that could result in soil erosion and the spread of invader plant species.

Furthermore, with regards to alien vegetation, the Alien and Invasive Species list, 2016, published by the Department of Environmental Affairs provides a full categorised list of alien plants that are deemed invasive and prohibited that must be controlled and eradicated as prescribed.

In terms of Section 38 of the National Heritage Resources Act 25 of 1999, and as the proposed development is more than 5000sqm in extent and it involves re-zoning of a site that is more than 10,000sqm in extent, Adansonia Heritage Consultants were commissioned to investigate the presence of archaeological and heritage features or graves on the site. Refer to **Annexure J** for the report compiled by Adansonia. Adansonia concluded and recommended the following:

- That the proposed project be exempted from a full phase 1 study as the survey revealed no archaeological, historical remains or graves.
- During their investigation it was established that only 0.84ha of the 3,6953ha was untransformed (natural vegetation).
- The proposed development which will result in the clearance of indigenous vegetation will have no impact on the cultural or historical environment.

- Further planning of the project may continue, and no mitigation measures are needed for the proposed development with a condition that should any archaeological or human remains be observed during the clearance of vegetation, a qualified archaeologist must be notified, and an assessment be done.

Adansonia will submit their report to SAHRA and the relevant mitigation measures have been included in the EMPr **(Annexure P)**

## 4 PUBLIC PARTICIPATION PROCESS

In accordance with the Constitution of the Republic of South Africa, it is the right of persons to have the environment in which they live protected in a responsible and sustainable manner. Every person also has the right of access to information and should be informed of any proposed scheduled activities.

Therefore, an important aspect of the Environmental Impact Assessment process is to identify potential Interested and Affected Parties (I&APs) and to provide them with accessible information, to which they may raise comments or voice any concerns associated with the proposed developments.

Registered I&APs have the right to comment on reports regarding the proposed development, which are to be submitted to the department by the consultant.

In return the registered interested and affected party is expected to:

- Submit all comments in writing to the consultant;
- Adhere to time frames given for commenting or submit a written motivation for why a longer commenting period is needed; and
- Disclose any direct business, financial, personal or other interest in the approval or refusal of the development.

GNR 326, Section 41 prescribes that I&APs must be identified and notified, the salient points of the approach are as follows:

- By placing notice boards in relevant places;
- By directly notifying all land owners and occupants of affected properties;
- By directly notifying neighbours to affected properties;
- By directly notifying ward councillors, rate payers associations, municipality and any relevant organ of state;
- By advertisement in local newspaper; and

- Any other method found reasonable for reaching affected parties which may not be reached with the above mentioned methods.

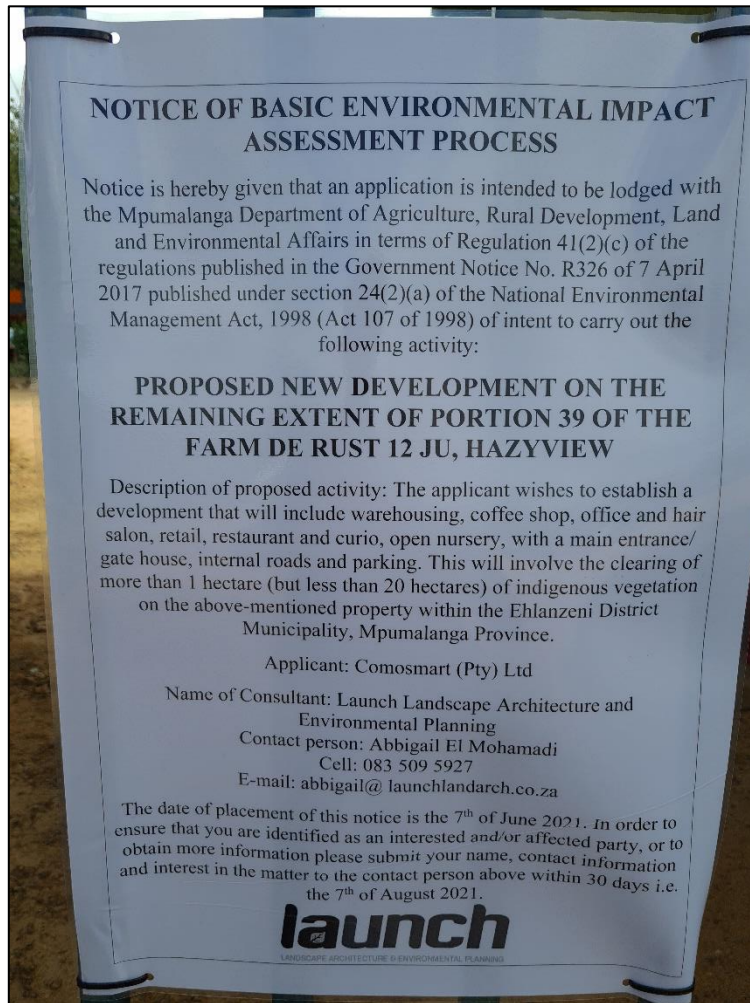
This was achieved through the following actions:

- The various authorities and neighbours were contacted via email on the 8<sup>th</sup> and 9<sup>th</sup> of June 2021, with a background information document (BID) explaining the proposed development and EIA procedure. Refer to **Annexure K** for a copy of the BID and notification emails to the I&APs. Refer to **Table 2** below for a list of I&APs that were notified. Refer to **Annexure L** for a copy of comments received from I&APs on the initial notification and BID.
- An advert was placed in the Lowvelder newspaper on the 3<sup>rd</sup> of June 2021 (**Figure 7**).
- A site notice was placed at the entrance gate on Monday the 7<sup>th</sup> of June 2021 (**Photo 1 and 2**).
- The draft Basic Assessment Report (BAR) was provided to all registered I&APs for a period of 30 days from the 21<sup>st</sup> of September to the 22<sup>nd</sup> of October 2021. Refer to **Annexure M** for a copy of the cover letter/ email and proof of delivery of the draft BAR to registered I&APs. Refer to **Annexure N** for a copy of the comments received on the draft BAR.

**Table 2: List of Interested and Affected Parties**

<b>Interested Party</b>	<b>Connection/ Interest</b>
Mpumalanga Tourism and Parks Agency	Mr Frans Krige / Government Agency
Ehlanzeni District Municipality	Mr. T Shanbangu, Environmental Manager
Mbombela Local Municipality	Municipal Manager
Department of Water and Sanitation (Inkomati Usuthu Catchment Management Agency)	Ms Manty Mashaba
Department of Agriculture	Mr. L Shabane, Sustainable Resource Management
Hazyview Chamber of Business and Tourism	Mr Chris Harvie
Site	Existing tenants and businesses
Neighbour South	Land Owner
Neighbour West	Land Owner
Neighbour North	Land Owner
Neighbour East	Land Owner





Photos 1 and 2: Site notice erected at entrance gate on 7 June 2021

All registered interested and affected parties have the right to comment on the report regarding the development submitted by the consultant to the department. In return the registered interested and affected party is expected to:

- Submit all comments in writing to the consultant;
- Adhere to time frames given for commenting or submit a written motivation for why a longer commenting period is needed; and
- Disclose any direct business, financial, personal or other interest in the approval or refusal of the development.

#### 4.1 SUMMARY OF COMMENTS AND RESPONSES

Comments received on the initial notification and BID as well as the draft BAR are summarised in Table 3 below:

**Table 3: Comments and Responses Report**

INITIAL NOTIFICATION AND BID	
<b>Thabile Mnisi: MTPA: 9 June 2021</b>	
Comment/s	Response/s
May you please send me the hard copy of the BAR once its available .	Noted. A hard copy of this draft BAR will be provided to the MTPA.
<b>Manty Mashaba: IUCMA: 9 June 2021</b>	
Comment/s	Response/s
I would like to registered as an IAP for the project.  The following are issues which I am(IUCMA) will be interested in:  <ol style="list-style-type: none"> <li>1. The transfer of water rights from agricultural to industrial?</li> <li>2. The source of water?</li> <li>3. The type of ablution facilities to be used during the construction phase and</li> <li>4. The management of sewage from the facilities during operation?</li> </ol>	The IUCMA has been registered as an I&AP.  The specific issues highlighted are addressed as follows:  <ol style="list-style-type: none"> <li>1. The proposed development is mixed use and includes not only warehousing, but other commercial uses as well. The site does not have (and has not had in the past) agricultural activities on it. A town planning process is underway for Township Establishment that will include erven zoned Industrial, Tourism, Business, Open Space and Transportation.</li> <li>2. Water will be sourced from the Mbombela Local Municipality and connection is technically possible with any required upgrades to be funded from the services contributions payable by the developer.</li> <li>3. Portable toilets will be provided during the construction phase which will be serviced weekly by the service provider. The amount of toilets to be provided will be at a ratio of 1 toilet for every 8 workers.</li> <li>4. Bulk sewerage is not available</li> </ol>



	<p>adjacent to the development and a new gravity link pipeline of approximately 700m must be installed to connect the development to the municipal infrastructure.</p> <p>The internal water and sewer infrastructure will be provided by the developer. All link lines to connect to the existing infrastructure will be provided by the developer. Any upgrades to the existing municipal infrastructure needed will be funded from the bulk service contributions payable to Mbombela Local Municipality.</p>
<p><b>Pete Kendrick: Adjacent Landowner (West): 10 June 2021</b></p>	
<p><b>Comment/s</b></p>	<p><b>Response/s</b></p>
<p>Wrt the Environmental Report for 39 de Rust there are three things that we will be looking at with interest. Probably in order of importance these are;</p> <ol style="list-style-type: none"> <li>1. Access off the R40 ... particularly when entering from a North to South direction.</li> <li>2. Surface water runoff / attenuation particularly in relation to the donga on our access road (it has some small culvert pipes installed).</li> <li>3. Noise from the item you refer to as "warehousing". As you are aware both we and our neighbour to the West run commercial lodges.</li> </ol> <p>Subject to the above we are very much in favour of the development.</p>	<p>The I&amp;APs general support of the development is noted and the following is noted in terms of the specific points highlighted:</p> <ol style="list-style-type: none"> <li>1. The traffic impact study (<b>Annexure E</b>) recommended the following be implemented in terms of the access to the development from the R40 and continued access along the right of way servitude at the north of the site to the properties to the west: <ul style="list-style-type: none"> <li>• The access intersection should be constructed as a double lane roundabout, taking cognisance of the future accessibility of this intersection being a future master plan road;</li> <li>• The development access shall be designed in such a way as to allow for accessibility towards the west of the proposed development as well and that the access road shall not terminate in the development itself;</li> <li>• The existing right of way servitude of 15.7m in width should be increased to at least 20m wide up to the western boundary of the application site; and</li> <li>• The security access gate should be relocated to the property's northern boundary and it should allow for future continuation of the access road.</li> </ul> </li> <li>2. The civil services report (<b>Annexure C</b>) addresses storm water as follows: <ul style="list-style-type: none"> <li>• Stormwater will be managed on the new internal roads and underground storm water infrastructure. The removal of storm water from the road surface and the entire development will be via a combination of surface channels and sub-surface storm water pipe network. Currently all the storm water flows to the western side of the site where a gulley has formed and continues westwards along the dirt road outside the property. An</li> </ul> </li> </ol>

	<p>attenuation dam will be provided in the north-western corner of the site to control the outlet volume of storm water off the property.</p> <p>3. The warehousing will be situated along the northern boundary adjacent to the existing right of way servitude and dirt road. The type of warehousing will be similar to the activities currently on site i.e. light industrial and not noise intensive. The small sawmill that is currently operating from the site will move to another site once construction commences. Furthermore, as the proposed development will also include other uses like a coffee shop, salon, etc. the warehousing would need to be of such a nature so as not to clash with the other aspects of the development.</p>
<p><b>Chris Harvie: Hazyview Chamber of Business and Tourism: 30 June 2021</b></p>	
<p><b>Comment/s</b></p>	<p><b>Response/s</b></p>
<p>We have no specific objections at this stage but we would like to record a couple of concerns, which we would require to be addressed in the event that the development is to go ahead. These are as follows:</p> <ol style="list-style-type: none"> <li>1. The current access is extremely dangerous already and it would without doubt be necessary for the road to be widened and, in addition, some form of traffic control system (traffic circle, stop street, filter lines, speed bumps or a combination of the above) will be absolutely essential. The road is fast, busy and carries heavy trucks, buses, taxis, passenger vehicles and agricultural machinery.</li> <li>2. Clear improved signage and lighting of the access and the roadside would be required with landscaping and treescaping to maintain good security and presentation.</li> <li>3. There would need to be guarantees in place with regard to noise control from tenant businesses.</li> <li>4. Parking would need to be away from the main road for safety reasons.</li> <li>5. Drainage would need to be maintained and ongoing attention given to the maintenance of the servitude road, on the northern side of the plot, which gives access to neighbouring properties, business and farms.</li> </ol>	<p>The point of no specific objections at this stage by the Chamber of Business and Tourism is noted. The following is further noted in terms of the specific points raised:</p> <ol style="list-style-type: none"> <li>1. The traffic impact study (<b>Annexure E</b>) recommended the following be implemented in terms of the access to the development from the R40 and continued access along the right of way servitude at the north of the site to the properties to the west: <ul style="list-style-type: none"> <li>• The access intersection should be constructed as a double lane roundabout, taking cognisance of the future accessibility of this intersection being a future master plan road;</li> <li>• The development access shall be designed in such a way as to allow for accessibility towards the west of the proposed development as well and that the access road shall not terminate in the development itself;</li> <li>• The existing right of way servitude of 15.7m in width should be increased to at least 20m wide up to the western boundary of the application site; and</li> <li>• The security access gate should be relocated to the property's northern boundary and it should allow for future continuation of the access road.</li> </ul> </li> <li>2. An Architect as been appointed and a draft site plan has been developed (<b>Annexure A</b>). A formal entrance gate and boundary wall will be constructed. The developer aims to establish a sustainable development that contributes positively to the aesthetics, growth and economy of the surrounding area. Furthermore it is noted</li> </ol>

	<p>that the development is located with a Localised Corridor in terms of the SDF (Refer to Section 5). As per the Spatial Proposals &amp; Development Directives of the SDF, developments facing the R40 should contribute to the aesthetic appearance envisaged along this route through extensive landscaping and specific architectural design.</p> <ol style="list-style-type: none"> <li>3. Due to the fact that the proposed development is a mixed use establishment with not only warehousing, but commercial aspects as well, the warehousing will be limited to activities that are not noise intensive to as to have compatible activities on the site. Furthermore, municipal by-laws in terms noise will be adhered to.</li> <li>4. Parking is away from the R40 within the access gate to the proposed development. Refer to the Layout Plan (<b>Annexure A</b>).</li> <li>5. The civil services report (<b>Annexure C</b>) addresses storm water as follows: <ul style="list-style-type: none"> <li>• Stormwater will be managed on the new internal roads and underground storm water infrastructure. The removal of storm water from the road surface and the entire development will be via a combination of surface channels and sub-surface storm water pipe network. Currently all the storm water flows to the western side of the site where a gulley has formed and continues westwards along the dirt road outside the property. An attenuation dam will be provided in the north-western corner of the site to control the outlet volume of storm water off the property.</li> </ul> </li> </ol>
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**DRAFT BASIC ASSESSMENT REPORT**

**Ms R Luyt: MDARDLEA: 4 October 2021**

Comment/s	Response/s
The final basic assessment report must include a consolidated single layout plan that must be referenced and dated, and must include a legend and land use table, must illustrate all areas and natural features recommended for exclusion, including the 1:100 year floodline, attenuation infrastructure, and recommended buffers, and must illustrate all specialist recommendations.	The consolidated layout plan has been compiled and is included as <b>Annexure I</b> . The site is not affected by a 1:100 year floodline as confirmed by the layout plan signed by the engineer in <b>Annexure A</b> .
On Page 16 of the basic assessment report you indicate that heritage impact assessment will not be required as the site is less than 5ha in extent. Please note that clearance of 5000sqm or ore of indigenous vegetation requires a heritage impact assessment. Please provide clarity in respect of the need for the study, and if necessary, communicate with SAHRA for confirmation.	Adansonia Heritage Consultants were commissioned to investigate the presence of archaeological and heritage features or graves on the site in terms of Section 38 of the NHRA ( <b>Refer to Annexure J</b> ). The report concludes that that the proposed project be exempted from a full phase 1 study as the survey revealed no archaeological, historical remains or graves and that the proposed development

	will have no impact on the cultural or historical environment.
Confirmation of access must be provided, which must be supported by the relevant roads authority.	Access to the site and for the development is available. Refer to <b>Annexure O</b> for comments received thus far from the City of Mbombela (CoM) on the townplanning establishment application. The traffic engineers (Hamatino Consulting Engineers) are in negotiations with the CoM to ascertain the position of the development access.
The provision of water, with appropriate capacity, must be demonstrated to be available before the application for environmental authorisation can be decided by this Department. Confirmation of supply must be presented as: written proof from the local municipality confirming they have the capacity to supply; or any boreholes that can sufficiently and sustainably meet the water demands and that such boreholes are supported by the Department of Water and Sanitation and the local municipality.	<p>The site and existing activities currently receive municipal water. Negotiations are underway with the CoM in terms of the water supply for the new development, but confirmation of this has not yet been received.</p> <p>As an alternative water source, there is a borehole on site that was used in the past by the previous land owner.</p> <p>As per the engineering report 20,13cbm of water (7347,45cbm per year) is required for the development during operation. This exceeds the amount that is generally authorised as per the National Water Act for the applicable quadrants, which is 45cbm per hectare per year, therefore 166cbm per year for the application site. As such, should groundwater need to be used for the daily water supply for the development, a Water Use License (WUL) will need to be obtained from the Department of Water and Sanitation (DWS). The IUCMA was provided the draft BAR for comment and follow-ups were made to receive a response timeously, however comments were not received by the time that this report was finalised.</p> <p>Furthermore, it is noted that additional mitigation measures have been incorporated into the EMPr with regards to water saving technologies to reduce the required water load that has been calculated by the engineer.</p> <p>Lastly, it is noted that water supply (if it is to be supplied by the CoM) will be included in the services agreement which is required prior to the rezoning and township proclamation.</p> <p>It is therefore requested that the MDADRLEA make the confirmation of water supply from the City of Mbombela or the obtaining of a WUL from the DWS, prior to construction commencing on site, a condition of the Environmental Authorisation.</p>
The proposed development will change the hydrology of the area. Storm water related impacts must be analysed thoroughly as part of the basic assessment process, and the requirement for attenuation to reduce the significance of such impacts must be determined. Where such is found to be necessary, minimum design capacity requirements for attenuation must	Storm water impacts were assessed as part of the draft BAR and are included in this final report. An attenuation pond was identified by the engineer to be needed for the site. A stormwater management plan has been developed by the civil engineer and incorporated into the consolidated site layout plan. <b>Refer to Annexures D and I.</b>

be calculated and provided.	
The final BAR must provide proof that all potential and registered I&APs, including all relevant Organs of State, were provided with access to and an opportunity to comment on the draft BAR following submission of the application form (Regulation 40(3)).	All registered I&APs and relevant Organs of State were provided an opportunity to comment on the draft BAR. <b>Refer to Annexures M and N.</b>
The final basic assessment report must include an issues and response report, as well as copies of and responses to comments received from all I&APs, including these comments.	Refer to this <b>Table 3</b> and <b>Annexures M and N.</b>
<b>Mr JJ Eksteen: MTPA: 20 October 2021</b>	
<b>Comment/s</b>	<b>Response/s</b>
The MTPA has no objection to the proposed developments provided that the recommendations from the specialist assessments and the EMPr are implemented.	Noted. Recommendations from the specialists have been incorporated into the EMPr. The EMPr will form part of the EA.
<b>Mr RT Chavalala: Department of Agriculture, Land Reform and Rural Development: 20 October 2021</b>	
<b>Comment/s</b>	<b>Response/s</b>
With reference to, the above application you are advised to apply for the change of land use as the proposed land is currently zoned for agricultural use.	Noted. A town planning application for rezoning is underway.
<b>Mr FS Sibozza: Ehlanzeni District Municipality: 15 October 2021</b>	
<b>Comment/s</b>	<b>Response/s</b>
Ehlanzeni District Municipality – Municipal Health and Environmental Management Department would like to acknowledge the receipt of the above-mentioned report and has conducted a site visit on the 11 October 2021 to assess the preferred site for the proposed development. Therefore, the District has no objection to the development on condition that the following requirements are adhered to:...	No objection to the development is noted. The EAP was present with Ms Mdluli during her site inspection on the 11 <sup>th</sup> of October 2021. The comments from the Ehlanzeni District Municipality were scrutinized and all relevant mitigation measures incorporated into the EMPr ( <b>Annexure O</b> ).
<b>Refer to Annexure N for the full comments from the Ehlanzeni District Municipality.</b>	
<b>Pete Kendrick: Adjacent Landowner (West): 10 June 2021</b>	
<b>Comment/s</b>	<b>Response/s</b>
Further to our conversation just over a week ago I would be grateful if you could please update us on the current status of the timing off the construction of the circle. You will recall there is some scepticism around the traffic department using the commuted sum to actually develop the circle and also the timing of it. This issue is very important to the residents on the dirt road adjacent to the development as accessing and in and out is already an issue and this will only be exacerbated by the development itself. As we indicated previously we are extremely supportive of the development and some comfort around the circle issue will be very useful.	The general support of the development is noted as well as the concern regarding access and road upgrades. A Traffic Impact Study was conducted and road upgrades identified, one of which will be a traffic circle at the access to the site on the R40. The CoM has informed that access to the site and for the development is available. The traffic engineers (Hamatino Consulting Engineers) are in negotiations with the CoM to ascertain the position of the development access. The right-of-way servitude to the north of the property is also proposed to be widened to improve traffic flow to the neighbouring properties to the west of the application site. Services agreements will be established prior to township establishment and proclamation and the bulk services contribution will be paid by the applicant for the

	road upgrades.
<b>Chris Harvie: Hazyview Chamber of Business and Tourism: 30 June 2021</b>	
<b>Comment/s</b>	<b>Response/s</b>
<p>Thanks for your email and for all the documentation provided.</p> <p>We are strongly in favour of any development that is potentially beneficial to tourism in Hazyview, particularly in the current economic climate.</p> <p>Further to your discussions with Pete Kendrick, which he has shared with me, we do however have significant concerns about the access, as previously raised, and we are hereby lodging an objection to the development until such time as we receive absolute guarantees that suitable improvements to the infrastructure will be completed (at the cost of whomever) simultaneously with the development. Such improvements will in all likelihood require the widening of the R40 and the construction of a traffic circle with a tarred access to the development.</p> <p>We have no objections other than this and we trust that these issues can be resolved and that the development will be able to go ahead and provide much-needed employment and income to our town.</p>	<p>The general support of the development is noted as well as the concern regarding access and road upgrades. A Traffic Impact Study was conducted and road upgrades identified, one of which will be a traffic circle at the access to the site on the R40. The CoM has informed that access to the site and for the development is available. The traffic engineers (Hamatino Consulting Engineers) are in negotiations with the CoM to ascertain the position of the development access. The right-of-way servitude to the north of the property is also proposed to be widened to improve traffic flow to the neighbouring properties to the west of the application site. Services agreements will be established prior to township establishment and proclamation and the bulk services contribution will be paid by the applicant for the road upgrades.</p>

All comments received have been duly addressed as far as reasonably possible. Additional studies have been conducted where required and further mitigation measures have been incorporated into the EMPr to ensure that issues identified are resolved and impacts reduced.

## 5 NEED AND DESIRABILITY

In terms of the 2019 Spatial Development Framework (SDF) of the City of Mbombela the property is located in an area earmarked for Strategic mix land uses and on a localised corridor (Refer to **Figure 8**). The SDF further specifies and addresses the following Spatial Proposals & Development Directives which are applicable to the property and development:

### **Localised Corridor**

- Localised corridors are proposed along the R40, the P17/6 and the R536 road to Sabie areas in which higher intensity of strategic mixed land uses, including developments that require good access and visual exposures will be promoted;
- Developments facing the R40 should contribute to the aesthetic appearance envisaged along this route through extensive landscaping and specific architectural design.

### **Strategic Mixed Use & Light Industrial Development**

- The Hazyview area currently has a narrow economic base, consisting primarily of retail and services.
- In order to expand this base and also provide more employment opportunities in future, it is recommended that provision should be made for strategic mixed land use areas and light industrial areas in order to accommodate more commercial, business, industrial, utilities, logistics etc. and businesses that will contribute to the local economy and employment.

**The proposed development will therefore address the proposals made in the Spatial Development Framework, 2019 in stimulating economic and development growth in Hazyview.**

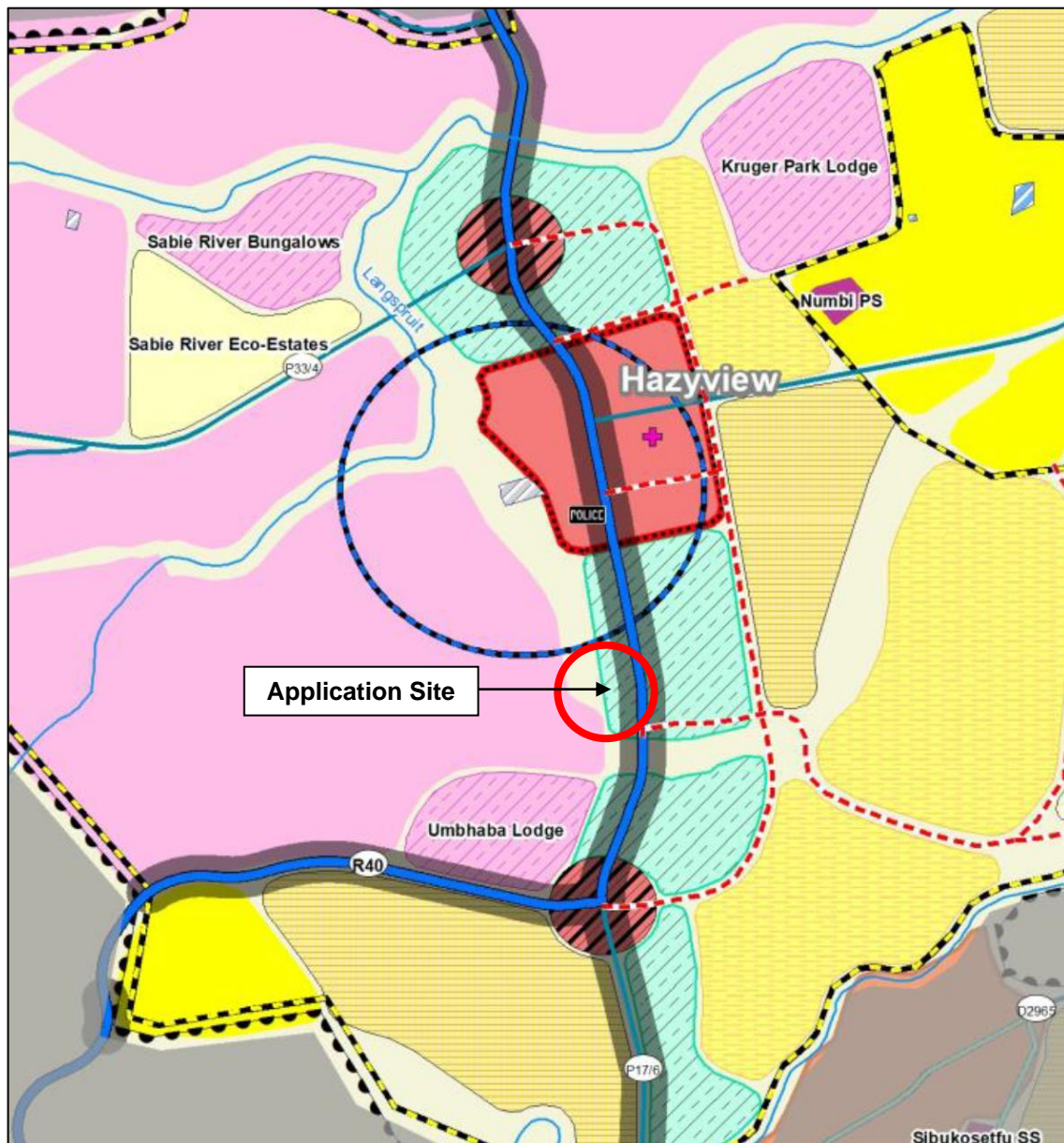


Figure 8: City of Mbombela Spatial Development Framework – Hazyview Strategic Spatial Framework  
Map extract. “Strategic Mixed Use” – Light blue hatch.

The property is perfectly situated next to the R40 which is one of the major access roads between Nelspruit and Bushbuckridge, and is used by almost all tourists visiting the area and Kruger National Park. It is also situated between the CBD area of Hazyview and other business and commercial land uses further south. The proposed development will therefore be an infill development between established land uses along the R40.

The existing land uses (small sawmill, Coastal Hire, aluminium and glass supply, fire safety supply) have been located on the property for many years. The site is within close proximity to a service



station and small retail centre. The proposed land uses are therefore compatible with surrounding land uses and are actually an expansion and formalization of the existing land uses.

The necessary engineering services can be provided to the new development and the proposed development can be supported from a servicing point of view.

The proposed development will lead to an increase in employment opportunities and skills development in the area and it will boost the local economy.

**From the above, it is clear that the proposed development to be located on the application site is needed and desirable.**

## **6 ALTERNATIVE ACTIVITY AND SITES**

### **ALTERNATIVE SITES**

The township establishment is limited to land ownership by the applicant and therefore no other sites are applicable.

### **ALTERNATIVE ACTIVITY**

In terms of the 2019 Spatial Development Framework (SDF) of the City of Mbombela the property is located in an area earmarked for Strategic mix land uses and on a localised corridor. The proposed development is therefore aligned to the SDF.

The existing land uses (small sawmill, Coastal Hire, aluminium and glass supply, fire safety supply) have been located on the property for many years. The site is within close proximity to a service station and small retail centre. The proposed land uses are therefore compatible with surrounding land uses and are actually an expansion and formalization of the existing land uses.

Furthermore, the design of the erven and street network was done in such a manner to develop the already disturbed areas, accommodate existing access roads in the area, ensure that storm water can be drained into natural open space areas and obtain maximum visibility from the main road (R40).

The proposed establishment of a mixed-use township is therefore considered desirable and aligned to the surrounding land uses and planning policies. It is therefore not considered necessary to recommend any alternative activities.

### **THE NO-GO ALTERNATIVE**

The no-go alternative is the option of not undertaking the proposed activity or any of its alternatives. The no-go alternative also provides the baseline against which the impacts of other alternatives should be compared.

Whilst the existing activities on the site have been operating for a number of years, the site in its current state is not functioning at its optimal socio-economic performance level. The proposed site layout has taken cognisance of already transformed areas, and most of the development will be focussed within these zones. Trees of conservation importance have been maintained with the site layout as much as possible. The limited ecosystem services that the site offers will therefore still be able to function on the site, whilst providing a more efficient socio-economic function to the surrounding community.

As the township establishment is desirable, the need established and existing, and the potential negative impacts minimal (with mitigation), the no-go option is thus not recommended.

## 7 POTENTIAL ENVIRONMENTAL IMPACTS

Potential environmental impacts should be considered when planning, designing and establishing the proposed development. Impacts were identified through the use of information gathered from a site investigation/s, aerial photographs, 1:50 000 maps and GIS planning tools, specialist studies, the professional judgment of the EAP, and as highlighted by I&APs. The proposed township establishment could potentially impact on main components of the physical environment as follows:

### 7.1 ECOSYSTEM FUNCTIONALITY

#### **Soil – Loss of functionality & Habitat Loss - Disturbance:**

The soils are the foundations of most terrestrial ecosystems. It is understood, that soil properties directly influence the vegetation (i.e. species, density, structure etc.), but soils also provide habitat for a variety of organisms. Loss of soil results in loss of functionality and habitat loss.

#### **Vegetation – Habitat Loss / transformation – Disturbance:**

Vegetation provides important protection to soil and reduces loss of soil moisture.

Disturbance of soil, such as clearing of vegetation and grading, removes established plant cover and gives opportunity to colonising plant species to establish on the site instead. This is the most common way for alien invasive vegetation, to successfully establish and spread. Loss of the herbaceous layer can also result in the encroachment of (indigenous), pioneer, woody species, which become abnormally dense when the natural balance is disturbed. Loss of vegetation can result in erosion, as well as the loss of shelter and foraging habitat for a variety of animals.

Approximately 50% of the site will be developed/ redeveloped. Whilst a large portion of this will be on already transformed areas, some natural woodland areas will also be transformed.

#### **Fauna – Habitat Loss / transformation – Wildlife Contact:**

Developments in natural areas may impact on animals by causing a loss of a variety of different habitats. Animals require cover and food. Valuable grazing, browsing and nesting will be lost to a minimal degree by the proposed development as a large portion of the proposed footprint will be

located on already transformed areas. Minimal faunal species exist on site. No faunal species of conservation concern were observed on the site by the Ecologist, and none are considered to be present due to a lack of suitable habitat and high disturbance levels. This is due to its location within a peri-urban area and along a busy road, and as it is already fenced off with high human activity. Whilst the development might scare the few species that exist on site away during the construction phase, these will return during the operation phase. This is due to the fact that the development allows for sufficient natural habitat to remain after construction is complete. Ecological corridors and connectivity to adjacent sites and natural areas will therefore be maintained.

### **Water- Quality and quantity – Disturbance and exploitation**

All living things require water to grow and reproduce. Water is utilized in agricultural, industrial, household, recreational and environmental activities. Activities during construction and operation of developments could result in negative impacts on both surface and ground water resources. Often negative impacts on other resources like soils have an indirect impact on water as well.

Disturbance of soils could lead to soil erosion and increased storm water runoff which could result in sedimentation and functionality of waterways on site and possibly further downstream as well. Agricultural practices could also result in eutrophication of waterways. Poor building practices and hazardous substances store and management could also negatively affect both surface and ground water resources.

Excessive use of boreholes could result in over exploitation and depletion of groundwater resources.

Currently a large volume of rain water that falls on the site runs towards the western side of the site where an eroded gully as formed. This stormwater then continues to travel westwards to the adjacent properties. The stormwater management plan has included an attenuation dam in the north-western corner of the site that will detain the stormwater and release it slowly. This will replenish groundwater, control the amount of stormwater that exits the site and prevent soil erosion.

The development was initially believed to obtain water from the Municipality of Mbombela, however the CoM has indicated that water is not available for the development. The engineer and applicant are in discussions with the CoM to ascertain this. As an alternative a borehole is present on site and groundwater could be abstracted. A Water Use License will need to be obtained and the conditions of the license must be met to ensure sustainable use of this valuable natural resource.

Ecosystem services are often forgotten or taken for granted until millions of Rands have to be spent on recreating the services that were previously supplied free of charge by our natural ecosystems.

**Figure 9** below illustrates the most common ecosystem services.

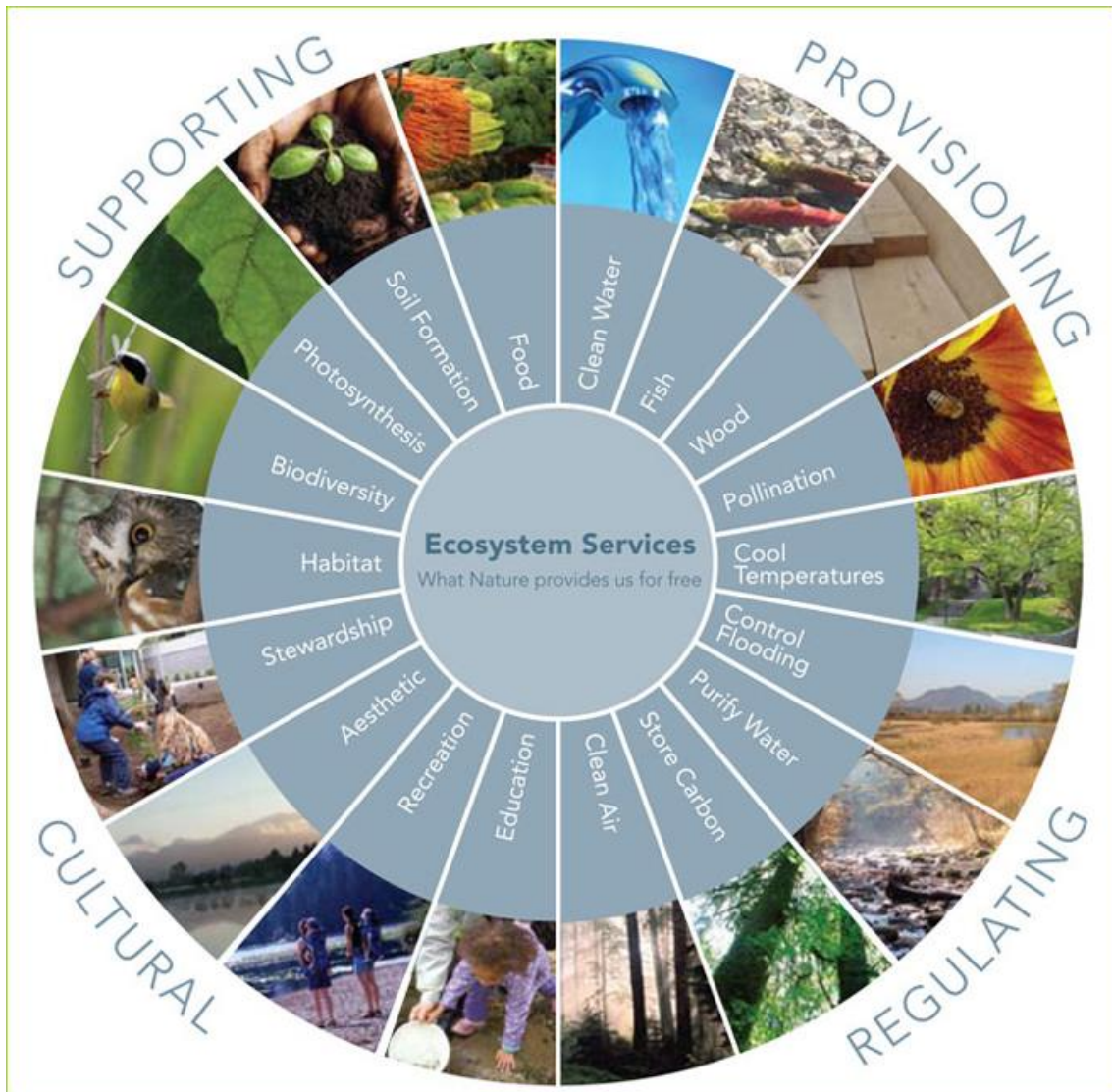


Figure 9: Ecosystem services. Source: UNEP Millennium Ecosystem Assessment.

The natural areas found on the site discussed herein, are important contributors to many of these ecosystem services and thus any impacts they sustain can have broader consequences/responses.

## 7.2 RESOURCES

### Soils:

Soil erosion, loss of topsoil and deterioration of soil quality are potential impacts that could be caused during the clearance of vegetation and the township establishment. Once disturbed, soil become more susceptible to erosion and the cleared areas will be exposed to sheet erosion caused by wind and water. Changes to natural drainage patterns may be created by the clearance of vegetation. Hardening of surfaces may change the water infiltration rates and cause increased run-off. Diversion of storm-water may result in increased volumes of water being concentrated in certain areas, thereby increasing the risk of erosion. Erosion of the soil surface greatly increases the risk of losing topsoil to erosion, impairing the soils ability to support vegetation growth.

Proper implementation of stormwater and erosion control measures during the construction phase will ensure that the impact on soils is limited and adherence to the stormwater management plan development by the project engineer will control stormwater during the operational phase.

Contamination of soil during construction through concrete mixing, storage of hazardous substances and re-fuelling/ maintenance of construction vehicles can also be prevented through implementation of proper mitigation measures.

**Flora:**

The proposed draft site development plan has been designed to ensure that the development is located mostly on already transformed areas. Clearance of natural vegetation is therefore limited and a high percentage of the site (50%) will remain in its natural state. The removal of protected tree/ plant species has also been limited as much as possible through cognisant placement of buildings and roads. Protected trees that will need to be removed are along the northern portion of the site where the proposed warehousing will be located and cut and fill of ground will take place. Permits for the removal of protected trees must be obtained prior to their destruction.

**Fauna:**

Increased traffic and disturbance to a site may have an impact on the wildlife of an area, in particular during construction. Impact can also be directly in the form of killing the animals either by accident or intentionally (poaching). Impact on flora will very often have an associated impact on particular animals.

The faunal species found on site are minimal, however, most of these animals and birds nesting or foraging on the site are anticipated to move away from the site during construction. Some smaller species will find refuge in the areas that will not be developed.

Some species could return once construction is complete. The increased human movement within the establishment during the operational phase will discourage animals and birds from inhabiting close to the buildings and infrastructure, but the large undeveloped areas will still provide suitable habitat.

**Water:**

Majority of the rain that falls on the site flows toward the western side of the property. Soil erosion is currently a concern, as an eroded gully has formed in the aforementioned corner of the site and water exits the site here and travels to neighbouring properties. Stormwater control and management has also been highlighted by I&APs (adjacent land owners) as a concern. The stormwater management plan proposes an attenuation pond that will capture stormwater, detain it, and release it slowly off site.

Confirmation of water supply from the CoM has not been established as yet, although the site is currently supplied with water by the municipality. An alternative is to abstract groundwater for which a WUL will be required to ensure the sustainable use of this valuable resource.

Water, like soils, can be polluted through the improper management of construction activities on site. Hazardous substances, if not used and stored correctly, could leach into the groundwater or wash away with rainwater to downstream watercourses. Likewise, the same applies with the improper management of waste and temporary toilet facilities during construction.

#### **Cultural – Historical / Socio – Economic Impacts:**

Construction activities may disturb archaeological or cultural artefacts, if any such are present. The site is not expected to have archaeological significance, however, the possibility and actions are covered in the Environmental Management Programme.

#### **Impacts on the Aesthetic Nature and ‘Sense of Place’:**

Sense of place includes impacts such as noise and light pollution and visual impacts. These are discussed briefly below. However, ‘sense of place’ also has heritage and spiritual connections and is often regarded as an Ecosystem Service (**Figure 9**). Sense of place is somewhat subjective, and whilst important, it is thus often difficult to evaluate. Mitigating measures and being aware of it usually minimises the impacts.

The proposed land use is in agreement with surrounding land-uses and is seen as a formalisation and extension of existing land uses. Furthermore, it is in line with the local and regional planning policies and will therefore contribute to the aesthetics and sense of place of Hazyview.

#### **Noise Pollution:**

Even very limited construction activities, may result in noise pollution, mainly from traffic from vehicles and machinery, but also from the construction crew.

Once construction is complete and the development has been established, applicable noise would be associated with the various land uses and human and vehicle movement. The main noise factor would be the warehousing component. This has therefore been located along the northern boundary of the site, along the access road for properties to the west, so as to limit disturbance to neighbouring properties. These warehouse facilities will also be of a nature similar to what is currently located on site i.e. Coastal Hire, which is considered to have a low noise impact. The small sawmill currently found on site will not be re-established within the new development.

#### **Air Pollution:**

Dust may be produced to a very limited extent during the construction phase (clearance of vegetation, grading and earthworks). This will be limited to the site, but could affect road users in the event of heavy gusts of wind. This will also be for a short duration prior to establishment of the development. Dust can be a nuisance but can, to a large extent, be controlled.

#### **Visual Impact:**

The biggest visual impact will be during the construction phase when vegetation is cleared and building works are taking place. This may affect the neighbours to a moderate degree and road users

to a lesser degree due to the speed of travel. Once the development is established this visual impact will be eliminated. The sense of place is anticipated to be improved through the establishment of an aesthetically pleasing and sustainable development.

#### **Safety and security:**

Unfortunately construction activities most often are accompanied by criminal activities. Increase in traffic, especially of large construction vehicles, on the surrounding road network also poses a risk to road users. These aspects are usually easily mitigated through proper site access, security and traffic control.

#### **Creating a long lasting footprint:**

Developments may disturb the general character of an area due to the nature and size of the development and result in a long-lasting footprint. **The proposed development is in line with the current and surrounding land uses as well as the local and regional planning policies. It is therefore anticipated to enhance the general character of the area and the town of Hazyview.**

## **8 POSSIBLE MITIGATION MEASURES**

This section deals with the recommended actions to mitigate the potential impacts identified in Section 7.

#### **Definition of 'mitigation measures':**

Mitigation means 'to make something less severe'. This may be by implementation of practical measures to reduce, limit and eliminate adverse impacts or enhance project benefits and protect public and individual rights.

The potential environmental concerns have been considered and investigated. Where appropriate, mitigation measures have been proposed. In many cases, the existing procedures are sound environmental impact prevention measures themselves and little or no additional mitigation is necessary in many aspects.

The mitigation measures provided below cut across various potential impacts and thus have not been presented against one or another particular impact, but should be considered as a suite of mitigation measures that may be implemented which will address one or more identified potential impact. More specific mitigation action is included in the environmental management programme in **Annexure P**.

#### **The Following Mitigation Measures and Procedures have been incorporated in the EMP:**

- A Site Development Plan must be submitted and approved by the Mbombela Municipality before the submission of approved building plans. Building plans for all existing and new infrastructure, unless exempted by virtue of any other legislation, must be submitted and approved before occupation of the site.

- All foundation recommendations and precautionary measures indicated by the Geotechnical Engineer must be incorporated into the final building plans. The foundations must be designed by a suitably qualified engineer to account for the sites unique geotechnical constraints. This should include the appropriate treatment of the in-situ soils (e.g. compaction) and/or the incorporation of reinforcement where necessary.
- All recommendations made by the Civil Engineer pertaining to services supply and infrastructure, including stormwater management, must be incorporated into the final building plans and approved by the Mbombela Municipality.
- In addition to the stormwater management plan to be implemented, the deep erosion gully in the western portion of the site should be rehabilitated. This may involve in-filling with sandbags or wire gabion baskets and covering with topsoil.
- All recommendations indicated by the Traffic Engineer should be implemented as described in the Traffic Impact Study.
- All areas that are not going to be developed must be demarcated and properly protected prior to the commencement of construction. Construction workers and vehicles must be properly supervised and no access to the natural habitats that will not be developed must be allowed.
- Protected tree species must be identified and marked. Those tree species remaining on site must be properly demarcated and protected during the construction phase. Permits must be obtained for the trees that need to be removed (prior to their removal).
- To comply with the National Environmental Management: Biodiversity Act (Act No. 10 of 2004), all listed invasive exotic plants should be targeted and controlled.
- It is important that weed control, if involving herbicides, be managed correctly to reduce the impact on the adjacent natural vegetation. Regular inspections should be made to determine if any additional alien plants have established.
- Confirmation of water supply from the City of Mbombela or a Water use license for the abstraction of groundwater must be obtained prior to the commenced of construction.
- Water saving techniques must be implemented to reduce the water demand. These should include:
  - Rain-water harvesting tanks;
  - Dual flush toilets;
  - Water sense aerator taps;
  - Planting of indigenous water-wise plants; and



- Installation of drip irrigation or smart irrigation with rain sensors and timers set to watering in early morning or early evening.

## 9 ENVIRONMENTAL IMPACT ASSESSMENT

### 9.1 ASSESSMENT METHODOLOGY

The potential impacts identified in Section 7 will be assessed using the impact assessment criteria below. These criteria are drawn from the Integrated Environmental Management Guidelines Series, Guideline 5: Assessment of Alternatives and Impacts, published by the Department of Environmental Affairs and Tourism (April 1998).

**Table 4: Impact Assessment Methodology**

<b>Nature of impact</b> This is an appraisal of the type of effect the proposed activity would have on the affected environmental component.		
<b>Duration</b> The lifetime of the impact; this is measured in the context of the lifetime of the proposed development.	<b>Short term</b>	The impact will either disappear with mitigation or will be mitigated through natural process in a span shorter than any of the phases. <b>(Rating 1)</b>
	<b>Medium term</b>	The impact will last up to the end of the phases, where after it will be entirely negated. <b>(Rating 3)</b>
	<b>Long term</b>	The impact will continue or last for the entire operational life of the development, but will be mitigated by direct human action or by natural processes thereafter. <b>(Rating 4)</b>
	<b>Permanent</b>	The only class of impact, which will be non-transitory. Mitigation either by man or natural process will not occur in such a way or in such a time span that the impact can be considered transient. <b>(Rating 5)</b>
<b>Extent/ Scale</b> The physical and spatial size of the impact.	<b>Local</b>	The impacted area extends only as far as the activity, e.g. a footprint. <b>(Rating 1)</b>
	<b>Site</b>	The impact could affect the whole, or a measurable portion of the application site. <b>(Rating 2)</b>
	<b>Regional</b>	The impact could affect the area including the adjacent properties, the surrounding transport routes and the adjoining towns. <b>(Rating 3)</b>
<b>Intensity</b> This indicates if the impact will destroy the environment (cause irreplaceable loss of resources) or alter its function. Furthermore the higher the intensity the more unlikely it is for the impact to be reversed.	<b>Low</b>	The impact alters the affected environment in such a way that the natural processes or functions are not affected. <b>(Rating 2)</b>
	<b>Medium</b>	The affected environment is altered, but function and process continue, albeit in a modified way. <b>(Rating 6)</b>
	<b>High</b>	Function or process of the affected environment is disturbed to the extent where it temporarily or permanently ceases. <b>(Rating 8)</b>

<p><b>Probability</b> This describes the likelihood of the impacts actually occurring. The impact may occur for any length of time during the life cycle of the activity, and not at any given time.</p>	<p><b>Improbable</b></p>	<p>The possibility of the impact occurring is very low, due either to the circumstances, design or experience. <b>(Rating 1)</b></p>
	<p><b>Probable</b></p>	<p>There is a possibility that the impact will occur to the extent that provisions must be made therefore. <b>(Rating 2)</b></p>
	<p><b>Highly probable</b></p>	<p>It is most likely that the impacts will occur at some or other stage of the development. Plans must be drawn up before the undertaking of the activity. <b>(Rating 4)</b></p>
	<p><b>Definite</b></p>	<p>The impact will take place regardless of any prevention plans, and there can only be relied on mitigatory actions or contingency plans to contain the effect. <b>(Rating 5)</b></p>
<p><b>Significance (Sum(Duration, Scale, Intensity) x Probability)</b> Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required.</p>	<p><b>Negligible</b></p>	<p>The impact is not substantial. Negative impacts do not require any mitigatory action, however measures to increase the significance of positive impacts should be considered. <b>(Rating &lt;20)</b></p>
	<p><b>Low</b></p>	<p>The impact is of little importance, but limited mitigation may be required for negative impacts. <b>(Rating &lt;40)</b></p>
	<p><b>Medium</b></p>	<p>The impact is of importance and therefore considered to have a substantial effect on the environment. Mitigation is required to reduce negative impacts of a medium rating to acceptable levels and positive impacts of a medium rating are considered beneficial to the environment. <b>(Rating &lt;60)</b></p>
	<p><b>High</b></p>	<p>The impact is of great importance. Failure to mitigate <b>negative impacts</b>, with the objective of reducing the impact to acceptable levels, could render the entire development option or entire project proposal unacceptable. Mitigation is therefore essential. <b>Positive impacts</b> of this rating are considered to be highly beneficial to the environment. <b>(Rating &gt;60)</b></p>
<p><b>Mitigatory Potential</b> Before assessing the significance of the impact after mitigation it is important to note the degree to which the impact can be mitigated.</p>	<p><b>Low</b></p>	<p>Little or no mitigation measures exists to mitigate negative impacts.</p>
	<p><b>Medium</b></p>	<p>Mitigation measures exist however some negative effects cannot be fully mitigated.</p>
	<p><b>High</b></p>	<p>The impact can be fully mitigated.</p>

## 9.2 IMPACT ASSESSMENT

The identified potential impacts for the construction and operational phases have been assessed according to the above methodology as indicated in the table below:

**Table 5: Impact Assessment**

Nature of Impact	Significance Assessment Without Mitigation					Mitigatory Potential	Significance Assessment With Mitigation						
	Duration	Scale	Intensity	Sum	Probability		Significance	Duration	Scale	Intensity	Sum	Probability	Significance
<b>CONSTRUCTION PHASE</b>													
<b>Topography and Geology</b>													
Possible instability associated with the geology of the site.	1	2	2	5	4	<b>20 Low</b>	High	1	2	2	5	2	<b>10 Negligible</b>
<b>Soil and Water</b>													
Site preparation including earth grading, trenching, and stock piling of materials, for the proposed development and associated infrastructure may result in soil erosion and sedimentation of downstream water courses.	3	3	6	12	4	<b>48 Medium</b>	High	3	3	6	12	2	<b>24 Low</b>
Improper management relating to the use and/or disposal of hazardous substances such as fuel, oil and cement could contaminate soil and water resources.	4	3	6	13	2	<b>26 Low</b>	High	4	3	6	13	1	<b>13 Negligible</b>
Improper management and/ or discharge of sewage from temporary facilities during the construction phase could contaminate soil and water resources.	4	3	6	13	2	<b>26 Low</b>	High	4	3	6	13	1	<b>13 Negligible</b>
Improper management and/ or disposal of generated domestic and construction waste (e.g. containers, bags, rubble, etc.) could result in soil and water pollution.	4	3	6	13	2	<b>26 Low</b>	High	4	3	6	13	1	<b>13 Negligible</b>
<b>Biodiversity</b>													
Invasive plant species may establish in cleared disturbed areas during construction which could	3	3	6	12	4	<b>48 Medium</b>	High	3	3	6	12	2	<b>24 Low</b>

Nature of Impact	Significance Assessment Without Mitigation						Mitigatory Potential	Significance Assessment With Mitigation					
	Duration	Scale	Intensity	Sum	Probability	Significance		Duration	Scale	Intensity	Sum	Probability	Significance
spread and impact on the biodiversity of the surrounding properties.													
Removal of protected trees species will decrease the biodiversity of the site.	4	3	6	13	4	<b>52 Medium</b>	High	3	3	6	12	2	<b>24 Low</b>
Unsupervised movement of workers and construction vehicles into the areas that are not earmarked for development will result in unnecessary biodiversity loss.	4	3	6	13	4	<b>52 Medium</b>	High	3	3	6	12	2	<b>24 Low</b>
<b>Local Economy (Positive Impact)</b>													
Increase in skills development and job opportunities during the construction phase will boost the local economy.	4	3	6	13	2	<b>26 Low</b>	High	4	3	6	13	4	<b>52 Medium</b>
<b>Existing Municipal Services</b>													
Possible damage to existing municipal services during construction.	3	3	6	12	2	<b>24 Low</b>	High	3	3	6	12	1	<b>12 Negligible</b>
<b>Safety and Security</b>													
Heavy vehicle traffic will increase during the construction phase due to movement of construction vehicles to and from the site. This could place a strain on the condition and safety of the surrounding road network.	3	3	6	12	4	<b>48 Medium</b>	Medium	3	3	6	12	2	<b>24 Low</b>
Crime may increase in the area. Job seekers and unwanted visitors during the construction phase as well as the use of day workers during the construction phase could pose a threat to the security of the area.	3	3	6	12	2	<b>24 Low</b>	Medium	3	3	6	12	1	<b>12 Negligible</b>
<b>Cultural Heritage</b>													
Possible impact on/ loss of heritage resources should any artefacts be unearthed during construction.	4	1	8	13	1	<b>13 Negligible</b>	High	4	1	8	13	1	<b>13 Negligible</b>
<b>Visual</b>													
Construction activities are anticipated to have a temporary visual impact on the surrounding area, due to dust as well as possible improper	3	3	6	12	2	<b>24 Low</b>	Medium	3	3	6	12	2	<b>24 Low</b>

Nature of Impact	Significance Assessment Without Mitigation						Mitigatory Potential	Significance Assessment With Mitigation					
	Duration	Scale	Intensity	Sum	Probability	Significance		Duration	Scale	Intensity	Sum	Probability	Significance
site and construction camp management.													
<b>Noise</b>													
Noise generation during the construction phase due to construction activities, although temporary and limited to construction hours, could impact negatively on surrounding land users.	3	3	6	12	2	<b>24 Low</b>	Medium	3	3	6	12	2	<b>24 Low</b>
<b>Air Quality</b>													
Air quality will be impacted on during the construction phase due mainly to dust generation and emissions from construction vehicles and equipment.	3	3	6	12	2	<b>24 Low</b>	High	3	3	2	8	2	<b>16 Negligible</b>
<b>OPERATIONAL PHASE</b>													
<b>Soil and Water</b>													
Improper management relating to the possible use of hazardous substances associated with the development and improper management or discharge of effluent (which does not meet DWS standards) could contaminate soil and water resources.	4	3	6	13	4	<b>52 Medium</b>	High	4	3	6	13	2	<b>26 Low</b>
Improper housekeeping including management and/ or disposal of waste could result in soil and water pollution.	4	3	6	13	4	<b>52 Medium</b>	High	4	3	6	13	2	<b>26 Low</b>
Stormwater run-off could pollute soil and water resources and increase silt load in downstream watercourses.	4	3	6	13	4	<b>52 Medium</b>	High	4	3	6	13	2	<b>26 Low</b>
Depletion of groundwater through improper use thereof.	4	3	6	13	4	<b>52 Medium</b>	High	4	3	6	13	2	<b>26 Low</b>
<b>Biodiversity</b>													
Possible encroachment of invasive species will impact on the biodiversity of the area.	4	3	6	13	4	<b>52 Medium</b>	High	4	3	6	13	2	<b>26 Low</b>
<b>Local Economy (Positive Impact)</b>													
Increase in skills development and job and business opportunities during the operational	4	3	6	13	2	<b>26 Low</b>	Medium	4	3	6	15	4	<b>52 Medium</b>

Nature of Impact	Significance Assessment Without Mitigation						Mitigatory Potential	Significance Assessment With Mitigation					
	Duration	Scale	Intensity	Sum	Probability	Significance		Duration	Scale	Intensity	Sum	Probability	Significance
phase will boost the local economy.													
<b>Existing Municipal Services and Surrounding Road Infrastructure</b>													
Possible strain on existing municipal services.	4	3	6	13	4	<b>52 Medium</b>	Medium	4	3	6	13	2	<b>26 Low</b>
<b>Health and Safety</b>													
Risk of fires or other emergency situations associated with the development.	1	2	8	12	4	<b>48 Medium</b>	High	1	2	8	12	2	<b>24 Low</b>
<b>Sense of Place (Positive Impact)</b>													
Improvement to local Sense of Place and aesthetics of the surrounding area through high standard design aligned to relevant planning policies and surrounding land uses.	4	3	6	13	2	<b>26 Low</b>	Medium	4	3	6	15	4	<b>52 Medium</b>
<b>Visual</b>													
Poor upkeep and maintenance of the development could have a negative impact on the aesthetics of the area and be an eye-sore to the surrounding community.	4	3	2	9	4	<b>36 Low</b>	High	4	3	2	9	1	<b>9 Negligible</b>
<b>Noise</b>													
Noise impact from operational activities can impact on the surrounding community as well as the staff and workers on site.	4	3	6	13	2	<b>26 Low</b>	Medium	4	3	2	9	2	<b>18 Negligible</b>
<b>Air Quality</b>													
Poor upkeep of internal roads could generate dust which could be a nuisance to neighbouring properties.	3	1	2	6	2	<b>12 Negligible</b>	Medium	3	1	2	6	1	<b>6 Negligible</b>

### 9.3 CUMULATIVE IMPACTS

A cumulative impact is the impact of an activity that in itself may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the same geographic area and/ or locality.

The anticipated cumulative negative impacts on the receiving environment are as follows:

- Loss of biodiversity due to removal of protected tree species and possible encroachment of alien invasive plant species.
- Increased stormwater runoff and soil erosion.

These impacts have been assessed in Table 5 above.

### 9.4 IMPACT ASSESSMENT CONCLUSION

There are potential environmental impacts which could be caused by the development if not mitigated. However, there are no identified environmental aspects that were assessed to have a high impact, neither before nor after mitigation. All impacts could be mitigated to having a low or negligible impact.

## 10 SPECIALIST RECOMMENDATIONS

The specialist reports have been included in full in the relevant Annexures. The insights and recommendations of the specialists have informed the identification and assessment in the sections above.

All relevant recommendations made by specialists have been included in the EMPr as mitigation measures.

## 11 DRAFT ENVIRONMENTAL MANAGEMENT PROGRAM

The Draft Environmental Management Program (EMPr) is attached in **Annexure P**. The EMPr is a draft as it may be required to be amended to accommodate conditions or requirements contained in the authorisation provided. In addition, the EMPr remains a 'living' document and may be modified (subject to MDARDLEA approval) to take into account new technology, conditions on site or construction methodology.

## 12 ASSUMPTIONS AND LIMITATIONS

The Basic Assessment Report has been prepared on the strengths of the information available, from our field surveys and that provided by the applicant at the time of the assessment. The assessment was conducted as a desktop study, a field survey, and in consultation with specialists in their field. The assumptions made and constraints that were prevalent did not obviously have any restrictive or negative implications on the study.



In undertaking this investigation and compiling the Basic Assessment Report, the following has been assumed:

- The information provided by the client is accurate;
- The scope of this investigation is limited to assessing the environmental impacts associated with the proposed development of a mixed-use township establishment.
- Should the project be authorised, the applicant will affect any development changes, recommendations and mitigation measures outlined in the BA and authorisation into the detailed design and construction specifications of the proposed project.

### 13 EAP RECOMMENDATIONS

The proposed development should be approved and completed as proposed, with the proposed mitigation measures, for the following reasons:

- The site is not located within a threatened ecosystem.
- The MBSP classifies the study area as being situated within an area assessed as Other Natural Areas as well as Heavily Modified, both of which are where a greater number of recommended land-uses can take place.
- There are no plant communities on site that were assessed as having a high Site Ecological Importance.
- No plant species of conservation concern occur on the site due to existing degradation and disturbance.
- No faunal species of conservation concern were observed on the site by the Ecologist and none are considered to be present due to a lack of suitable habitat and high disturbance levels.
- There are no geological aspects that might cause instability which cannot be mitigated through design.
- The proposed development is shown to be needed and desired and it is therefore sustainable due to the following reasons:
  - It is in line with surrounding land uses and local and regional planning initiatives.
  - It will provide job opportunities, skills development and boost the local economy.
  - Existing site activities have been operating from the property for a number of years and the development is therefore seen to be an expansion and formalisation of the current businesses on site.
  - Services can be provided to the development.

- Access is available and the development is supported from a traffic impact perspective provided that the recommendations for intersection upgrades indicated by the Traffic Engineer are implemented.
- A stormwater management plan has been developed which will control stormwater and mitigate soil erosion, if implemented.
- The draft site development plan proposes buildings and structures mostly on already transformed areas and it accommodates as many of the protected tree species identified on site as possible.
- There are no identified environmental aspects that were assessed to have a high impact, neither before nor after mitigation. And all impacts could be mitigated to having a low or negligible impact.
- A large portion of the site (approximately 50%) will remain undeveloped and natural providing biodiversity and connectivity to the surrounding area.

### 13.1 PREFERRED ALTERNATIVES

The proposed township establishment should be completed as proposed on the site, the Remaining Extent of Portion 39 of the Farm De Rust 12 JU, Hazyview.

#### **No-go alternative**

It is not recommended that the no-go alternative be preferred.

### 13.2 ADDITIONAL MITIGATION MEASURES

The environmental management programme (EMPr) should form part of the contract between any potential external contractor and the client. This will help ensure that the EMPr is adhered to.

An Environmental Control Officer (ECO) should be appointed for the construction phase, to assist the contractor overcoming any unforeseen issues at the time of construction and be able to provide a level of assurance and oversight to stakeholders that the site is being well managed.

## 14 CONCLUSION

Based on the information contained in this report, it is the opinion of the environmental assessment practitioner that, provided the negative aspects of the proposed development are mitigated in accordance with the mitigation measures proposed (and as reflected in the Environmental Management Programme), that the clearance of indigenous vegetation and proposed township establishment may be undertaken as proposed.

## 15 EAP EXPERTISE AND DECLARATION

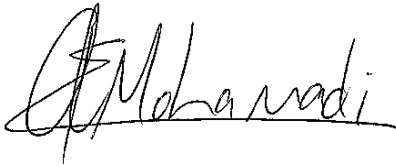
Abbigail El Mohamadi holds a BSc degree in Landscape Architecture and has seventeen (17) years' experience in Environmental Impact Assessments, Basic Assessments, Environmental Management Programmes and Public Participation in terms of the National Environmental Management Act, 1998 (107 of 1998), as amended, and the Environmental Impact Assessment Regulations, as amended. Abbigail is a member of the IAIAA and is a registered EAP with the EAPASA.

Refer to **Annexure Q** for a copy of the EAP's CV for more detailed expertise information.

I, **Abbigail El Mohamadi**, hereby confirm that:

- The information provided in this report is correct at the time of compilation and was compiled with input provided by the applicant as well as the content of the specialist reports.
- Comments received from I&APs to date have been included in this draft BAR.
- Comments received on this draft BAR will be included in the final report which will be submitted to the competent authority.
- Any information provided to I&APs and/ or responses to comments or inputs made by I&APs is correct according to the information provided by the applicant as well as based on the professional opinion of the EAP.

Signature:



Date: 10 November 2021

\*\*\* END \*\*\*

**ANNEXURE A**  
**PROPOSED SITE LAYOUT PLAN**

**ANNEXURE B  
SITE PHOTOGRAPHS**

**ANNEXURE C  
CIVIL SERVICES REPORT**

**ANNEXURE D**  
**STORMWATER MANAGEMENT PLAN**

**ANNEXURE E:  
TRAFFIC IMPACT STUDY**



**ANNEXURE F**  
**ENGINEERING GEOLOGICAL INVESTIGATION**

**ANNEXURE G**  
**TERRESTRIAL ECOLOGY STUDY**

**ANNEXURE H**  
**ENVIRONMENTAL SCREENING TOOL REPORT**

**ANNEXURE I**  
**CONSOLIDATED SITE LAYOUT PLAN**

**ANNEXURE J  
HERITAGE IMPACT REPORT**

**ANNEXURE K  
BID AND NOTIFICATION SENT TO I&APS**

**ANNEXURE L**  
**I&APS COMMENTS ON INITIAL NOTIFICATION**

**ANNEXURE M**  
**COPY OF DRAFT BAR NOTIFICATION**



**ANNEXURE N**  
**COMMENTS ON DRAFT BAR**

**ANNEXURE O**  
**PRELIMINARY COMMENTS FROM COM ON THE TOWNPLANNING**  
**ESTABLISHMENT APPLICATION**

**ANNEXURE P**  
**ENVIRONMENTAL MANAGEMENT PROGRAMME**

**ANNEXURE Q**  
**EAP CV**