



**Client  
Project**

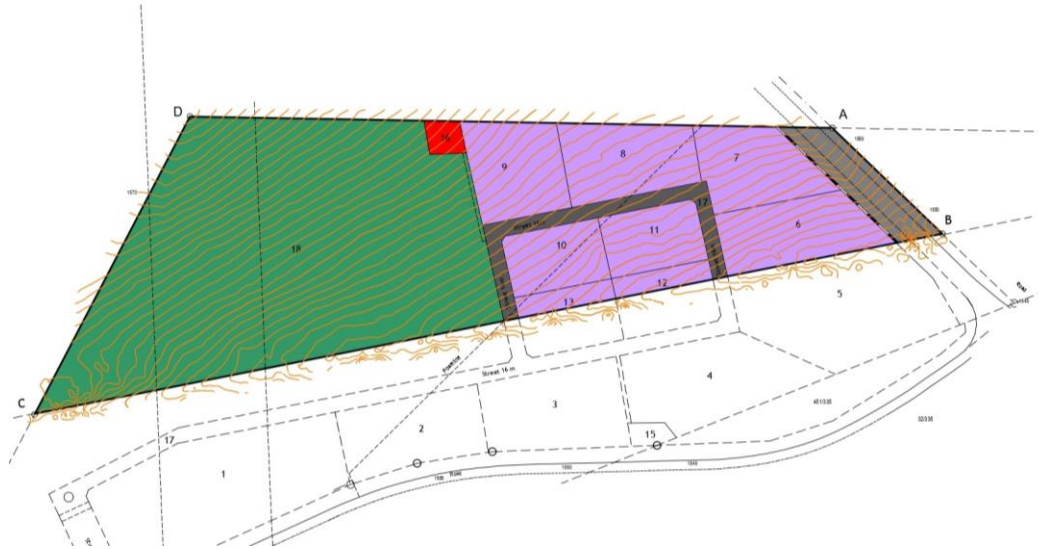
**CUBERMAN (PTY) LTD**  
MIXED USE DEVELOPMENT ON THE  
REMAINDER OF PORTION 48 (A PORTION OF  
PORTION 32) OF THE FARM NAAUWPOORT  
335 JS\_ BASIC ASSESSMENT REPORT

**Date**

FEBRUARY 2022

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## Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS, for Industrial Use and Cemetery

### Basic Assessment Report

EIA Ref No. To be confirmed upon submission of Application to the Competent Authority



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## BASIC ASSESSMENT APPROACH

### Legal Requirements and Legislative Process

As part of the proposed project, certain listed activities may be triggered which is defined under the National Environmental Management Act, Act No. 107 of 1998 (NEMA, 1998), as amended, and the regulations there under will take place.

Relevant listed activities triggered by the proposed development is discussed under Section 5.2 of this Report.

It is the intention of the Basic Assessment Report (BAR) to provide the necessary information pertaining to the proposed project and its associated activities, as required in terms of the Environmental Impact Assessment Regulations, 2014, as amended (EIA Regulations in terms of Chapter 4 of NEMA, 1998) under NEMA, 1998, as amended.

This BAR intends to highlight all information relevant to the proposed mixed use development.

The diagram below provides a visual representation of the Basic Assessment approach followed in terms of NEMA, 1998, as amended, and the Environmental Impact Assessment Regulations, 2014, as amended.

	Schedule	Process	Steps Followed
P H A S E  1	Draft BAR Compilation: <b>(113 Days)</b>	<ul style="list-style-type: none"> <li>Specialist Studies</li> <li>Impact Assessment and Mitigation measures</li> <li>Draft BA Report</li> </ul>	<ul style="list-style-type: none"> <li>Compilation of Draft Basic Assessment Report</li> </ul>
	<p>Draft BAR &amp; PPP:</p> <p>Public Participation Process (PPP)_ Registration of I&amp;APs: <b>(52 Days)</b></p> <p>Additional Registration: <b>(30 Days)</b></p> <p>PPP: Draft BAR Review and Commenting <b>(30 Days)</b></p>	<ul style="list-style-type: none"> <li>Background Information Document;</li> <li>Newspaper Advertisement;</li> <li>Site Notice Boards; and</li> <li>Registration of Interested &amp; Affected Parties (I&amp;AP).</li> </ul>	<ul style="list-style-type: none"> <li>Background Information Document distributed to all I&amp;APs and relevant stakeholders.</li> <li>Letters to inform I&amp;APs and Stakeholders of the availability of the Draft BA Report for public and Stakeholder comment.</li> <li>Newspaper Advertisement placed within the Beeld Newspaper.</li> <li>Site Notice Boards placed along the proposed project site boundary.</li> <li>Registered post and electronic notifications.</li> <li>I&amp;APs and Stakeholder comments recorded.</li> <li>Availability of Draft Basic Assessment Report.</li> <li>I&amp;APs and Stakeholder comments recorded.</li> <li>Continued consultation with local authorities and communication to I&amp;APs.</li> </ul>
	Application and Draft BAR submission to MDARDLEA <b>(1 Day)</b>	<ul style="list-style-type: none"> <li>EIA Application Form</li> <li>Draft BA Report and EMP</li> </ul>	<ul style="list-style-type: none"> <li>Submission of application form and obtaining a reference number.</li> <li>Submission of Draft BAR and EMP for commenting.</li> </ul>
	Final BAR Compilation: <b>(33 Days)</b>	<ul style="list-style-type: none"> <li>Final BA Report compilation</li> </ul>	<ul style="list-style-type: none"> <li>Incorporation of comments and issues from I&amp;AP and Stakeholders into BA Report.</li> </ul>
	Final BAR submission to MDARDLEA: <b>(1Day)</b>	<ul style="list-style-type: none"> <li>EIA Application Form</li> <li>Final BA Report</li> </ul>	<ul style="list-style-type: none"> <li>Submission of application form and obtaining Project reference number.</li> <li>Final BAR Report submission to MDARDLEA.</li> </ul>

	Schedule	Process	Steps Followed
P H A S E  3	Authorities Decision Result: <b>(107 Days)</b>	<ul style="list-style-type: none"> <li>Authorities Decision Making Stage - 107 days from Final BAR submission.</li> </ul>	<ul style="list-style-type: none"> <li>Notify I&amp;APs and Stakeholders of government authority's decision on the Environmental Authorisation Application within 14 days (2 Weeks).</li> </ul>

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## DEFINITIONS

### Alternatives

In relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to the-

- a) property on which or location where the activity is proposed to be undertaken;
  - b) type of activity to be undertaken;
  - c) design or layout of the activity;
  - d) technology to be used in the activity; or
  - e) operational aspects of the activity;
- and includes the option of not implementing the activity.

### Application

An application for an Environmental Authorisation (EA).

### Basic Assessment Report

A report contemplated in regulation 21 of the EIA Regulations, 2014.

### Buffer Area

Unless specifically defined, means an area extending 10 kilometres from the proclaimed boundary of a world heritage site or national park and 5 kilometres from the proclaimed boundary of a nature reserve, respectively, or that defined as such for a biosphere.

### Building and Demolition Waste

Means waste, excluding hazardous waste, produced during the construction, alteration, repair or demolition of any structure, and includes rubble, earth, rock and wood displaced during that construction, alteration, repair or demolition [NEM:WA, Act No 59 of 2008].

### Cumulative Impact

In relation to an activity, means the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may become significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities.

### Dangerous Good

Goods containing any of the substances as contemplated in South African National Standard No. 10234, supplement 2008 1.00: designated "List of classification and labelling of chemicals in accordance with the Globally Harmonized Systems (GHS)" published by Standards South Africa, and where the presence of such goods, regardless of quantity, in a blend or mixture, causes such blend or mixture to have one or more of the characteristics listed in the Hazard Statements in section 4.2.3, namely physical hazards, health hazards or environmental hazards.

### Development

The building, erection, construction or establishment of a facility, structure or infrastructure, including associated earthworks or borrow pits, that is necessary for the undertaking of a listed or specified activity, including any associated post development monitoring, but excludes any modification, alteration or expansion of such a facility, structure or infrastructure, including associated earthworks or borrow pits, and excluding the redevelopment of the same facility in the same location, with the same capacity and footprint.

**Development footprint**

Any evidence of physical alteration as a result of the undertaking of any activity.

**EAP**

An environmental assessment practitioner as defined in section 1 of NEMA.

**EMPr**

An environmental management programme contemplated in regulations 19 and 23 of the EIA Regulations, 2014.

**Environment**

The surroundings (biophysical, social and economic) within which humans exist and that are made up of:

- (i) the land, water and atmosphere of the earth;
- (ii) micro-organisms, plant and animal life;
- (iii) any part or combination of (i) and (ii) and the interrelationships among and between them; and
- (iv) the physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and wellbeing.

**Environmental Impact**

Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization’s activities, products or services.

**Environmental Impact Assessment**

A systematic process of identifying, assessing and reporting environmental impacts associated with an activity and includes Basic Assessment and Scoping and Environmental Impact Reporting.

**General Waste**

Means waste that does not pose immediate hazard or threat to health or to the environment, and includes:

- a) domestic waste;
- b) building and demolition waste;
- c) business waste; and
- d) inert waste [NEM:WA, Act No 59 of 2008].

**Hazardous Waste**

Means any waste that contains organic or inorganic elements compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have detrimental impact on health and the environment [NEM:WA, Act No 59 of 2008].

**Independent**

In relation to an EAP, a specialist or the person responsible for the preparation of an environmental audit report, means-

- a) that such EAP, specialist or person has no business, financial, personal or other interest in the activity or application in respect of which that EAP, specialist or person is appointed in terms of the EIA Regulations; or
- b) that there are no circumstances that may compromise the objectivity of that EAP, specialist or person in performing such work;

excluding -

- (i) normal remuneration for a specialist permanently employed by the EAP; or
- (ii) fair remuneration for work performed in connection with that activity, application or environmental audit.

### **Indigenous Vegetation**

Vegetation consisting of indigenous plant species occurring naturally in an area, regardless of the level of alien infestation and where the topsoil has not been lawfully disturbed during the preceding ten years.

### **Industrial Complex**

An area used or zoned for industrial purposes, including bulk storage, manufacturing, processing or packaging purposes.

### **Land Use**

The various ways in which land may be employed or occupied. Planners compile, classify, study and analyse land use data for many purposes, including the identification of trends, the forecasting of space and infrastructure requirements, the provision of adequate land area for necessary types of land use, and the development or revision of comprehensive plans and land use regulations.

### **Mitigation**

To anticipate and prevent negative impacts and risks, then to minimise them, rehabilitate or repair impacts to the extent feasible.

### **Phased Activities**

An activity that is developed in phases over time on the same or adjacent properties to create a single or linked entity.

### **Pollution Prevention**

Any activity that reduces or eliminates pollutants prior to recycling, treatment, control or disposal.

### **Public Participation Process**

A process of involving the public in order to identify needs, address concerns, to contribute to more informed decision making relating to a proposed project, programme or development.

### **Registered Interested and Affected Party**

In relation to an application, means an Interested and Affected Party whose name is recorded in the register opened for that application in terms of regulation 42 of the EIA Regulations, 2014.

### **Significant Impact**

An impact that may have a notable effect on one or more aspects of the environment or may result in non-compliance with accepted environmental quality standards, thresholds or targets and is determined through rating the positive and negative effects of an impact on the environment based on criteria such as duration, magnitude, intensity and probability of occurrence.

### **Specialist**

A person that is generally recognised within the scientific community as having the capability of undertaking, in conformance with generally recognised scientific principles, specialist studies or preparing specialist reports, including due diligence studies and socio-economic studies.

### **Systematic Biodiversity Plan**

A plan that identifies important areas for biodiversity conservation, taking into account biodiversity patterns (i.e. the principle of representation) and the ecological and evolutionary processes that sustain them (i.e. the principle of

persistence). A systematic biodiversity plan must set quantitative targets/thresholds for aquatic and terrestrial biodiversity features in order to conserve a representative sample of biodiversity pattern and ecological processes.

### **Topography**

Topography, a term in geography, refers to the "lay of the land" or the physio-geographic characteristics of land in terms of elevation, slope and orientation.

### **Vegetation**

All of the plant life growing in and characterizing a specific area or region; the combination of different plant communities found there.

### **Waste**

Waste is unwanted or undesired material left over after the completion of a process. "Waste" is a human concept: in natural processes there is no waste, only inert end products.

### **Watercourse**

(a) a river or spring;  
(b) a natural channel in which water flows regularly or intermittently;  
(c) a wetland, pan, lake or dam into which, or from which, water flows; and  
any collection of water which the Minister may, by notice in the Gazette, declare to be a watercourse as defined in the National Water Act, 1998 (Act No. 36 of 1998); and  
a reference to a watercourse includes, where relevant, its bed and banks.

### **Wetland**

Land which is transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is periodically covered with shallow water, and which land in normal circumstances supports or would support vegetation typically adapted to life in saturated soil.

## ABBREVIATIONS

<b>BAR</b>	-	Basic Assessment Report
<b>BID</b>	-	Background Information Document
<b>CBA</b>	-	Critical Biodiversity Area
<b>CRR</b>	-	Comments and Response Report
<b>DWA</b>	-	Department of Water Affairs
<b>DWS</b>	-	Department of Water and Sanitation
<b>EA</b>	-	Environmental Authorisation
<b>EAP</b>	-	Environmental Assessment Practitioner
<b>ECA</b>	-	Environmental Conservation Act of 1989
<b>EIA</b>	-	Environmental Impact Assessment
<b>EIR</b>	-	Environmental Impact Report
<b>EMF</b>	-	Environmental Management Framework
<b>EMP</b>	-	Environmental Management Programme
<b>ESA</b>	-	Ecological Support Area
<b>GN</b>	-	Government Notice
<b>Ha</b>	-	Hectare
<b>I&amp;AP</b>	-	Interested and Affected Party
<b>IWULA</b>	-	Integrated Water Use Licence Application
<b>MBSP</b>	-	Mpumalanga Biodiversity Sector Plan
<b>MDARDLEA</b>	-	Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs
<b>NEMA</b>	-	National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended
<b>NEM:WA</b>	-	National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), as amended
<b>NHRA</b>	-	National Heritage Resources Act, 1999 (Act No. 25 of 1999), as amended
<b>NWA</b>	-	National Water Act, 1998 (Act No. 36 of 1998)
<b>PA</b>	-	Protected Area
<b>R</b>	-	Regulation
<b>SAHRA</b>	-	South African Heritage Resources Agency
<b>SANS</b>	-	South African National Standards
<b>SAWIC</b>	-	South African Waste Information Centre

## 1. PROJECT TITLE

Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS for Industrial Use and a Cemetery.

## 2. APPLICANT DETAILS

<b>Applicant Name</b>	Cuberman (Pty) Ltd
<b>Contact Person</b>	Etiene Bruwer
<b>Postal Address</b>	14 Bethal Street, Modelpark, eMalahleni
<b>Telephone Number</b>	013 650 0408
<b>Cell phone Number</b>	082 805 8623
<b>Email Address</b>	bruwer.eteine@gmail.com

## 3. ENVIRONMENTAL ASSESSMENT PRACTITIONER DETAILS

<b>Environmental Assessment Practitioner Company</b>	Labesh (Pty) Ltd
<b>Contact Person</b>	Lourens de Villiers
<b>Postal Address</b>	Postnet Box 469, Private Bag X504, Sinoville, 0129
<b>Telephone Number</b>	082 789 6525
<b>Email Address</b>	info@labesh.co.za
<b>Qualifications</b>	B.Sc Earth Science (North West University) Hons B.Sc Geography and Environmental Studies (North West University) M.Sc Water Resource Management (University of Pretoria)
<b>Relevant experience</b>	20 years experience conducting Environmental Impact Assessment processes

The EAP's Company Details are attached to this report under Appendix E.

## 4. LOCATION OF THE PROPOSED DEVELOPMENT AND ACTIVITIES

The property for the proposed development and its associated activities is as follows:

Property/Land Parcel	21 digit Surveyor General Code	Property size
Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS	T0JS00000000033500048	170 798m <sup>2</sup> (17, 0798Ha)

The project location is approximately 15km South of Emalahleni, in the Emalahleni Local Municipality of the Nkangala District Municipality, Mpumalanga Province. The GPS coordinates for the project site are as follows:

25° 57'23.69"S; 29° 15'0.88"E

A locality map, provided on the next page, shows the location of the project property, at an appropriate scale.





### SITE LOCALITY MAP

RE Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS



#### AREA SCOPE

- Property Boundary\_ 18,79Ha
- Site Boundary\_ +/- 17, 6HA

Site Coordinates: 25° 57'23.69"S; 29°15'0.88"E

NGI Reference: 2529CC; 2529CD

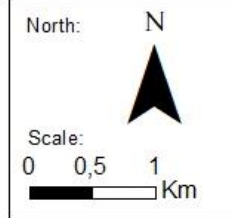


Figure 1: Site Locality Map

The following photographs give an indication of the current status of the project property. Photographs are also given under Appendix B.



## 5. SCOPE OF THE PROPOSED DEVELOPMENT AND ACTIVITIES

### 5.1 Description of the activities to be undertaken

The land, on which the proposed township is to be established, is situated on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS. The land is owned by Cuberman (Pty) Ltd (herein after referred to as the 'applicant') and is approximately 17,0798 Ha in extent. The proposed site is located south of Duvhapark Township and is situated in an area dominated by industrial activities (Naauwpoort Industrial Area).

The applicant bought both the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS and the Remainder of Portion 439 (A Portion of Portion 49) of the Farm Naauwpoort 335 JS (for which environmental authorisation was already obtained under reference: 1/3/1/16/1N-275). The intention of the applicant is to establish a township within the Naauwpoort Industrial Area. The township shall be known as "Naauwpoort Park" and will allow for the establishment of an industrial park and a cemetery (private memorial park).

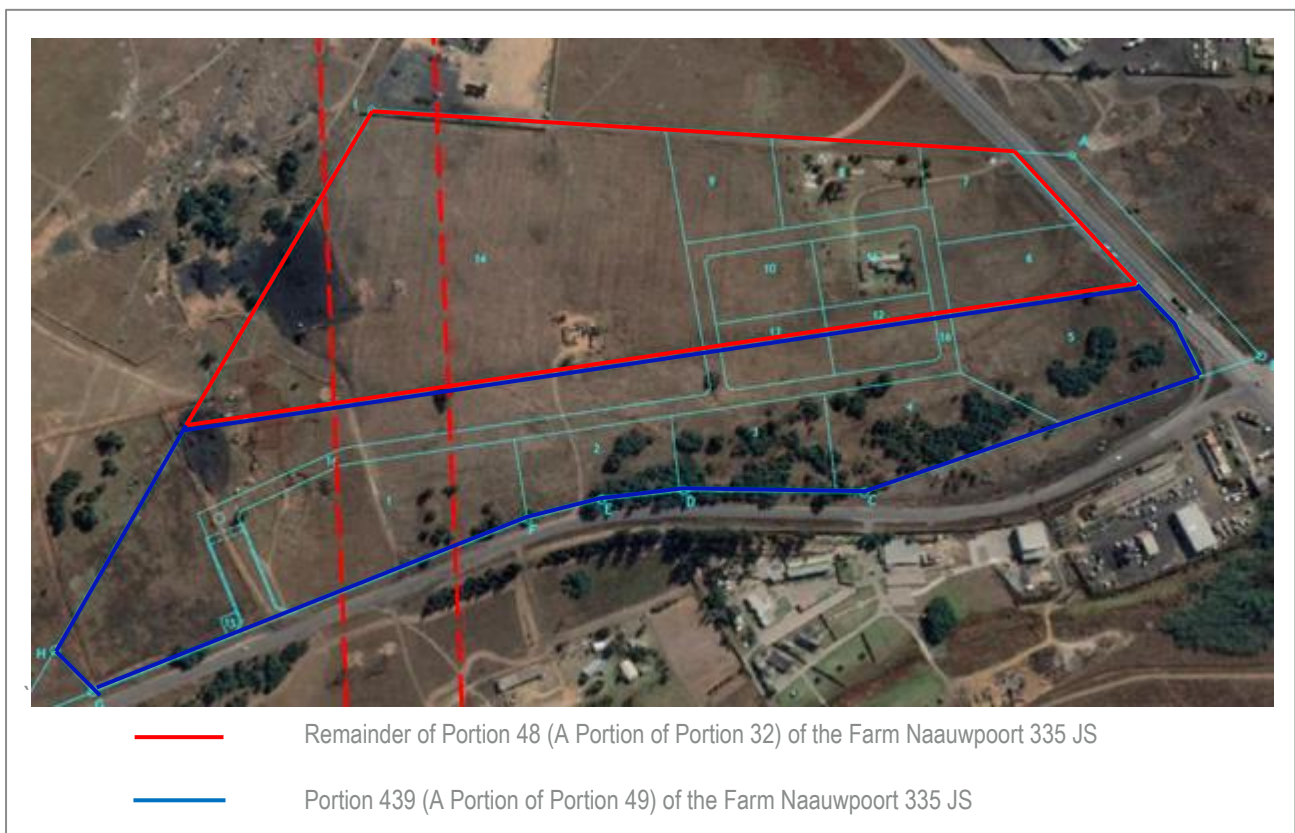


Figure 2: Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS and Portion 439 (A Portion of Portion 49) of the Farm Naauwpoort 335 JS (*Korsman & Associates, 2021*).

**The project site (for which Environmental Authorisation (EA) is applied for) is:** The Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS. The proposed project site falls within the Emalahleni Local Municipality and the Nkangala District Municipality, Mpumalanga Province.

### Existing buildings on site

The following infrastructure is currently present at the project site:

- Two dwelling units are currently present on the site (which will be demolished once development takes place) and overhead power lines. The remaining area of the project site is open, vacant land.

### Proposed project

The proposed project will entail the establishment of a township on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS, for industrial use and a cemetery (private memorial park). The proposed township will comprise of:

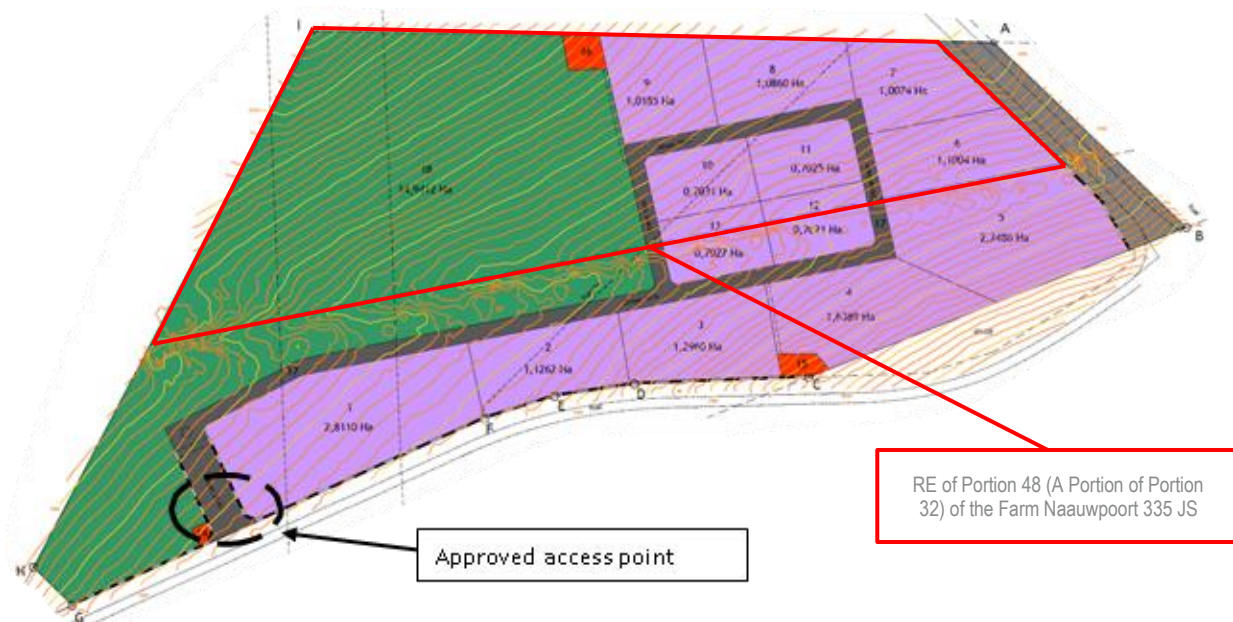
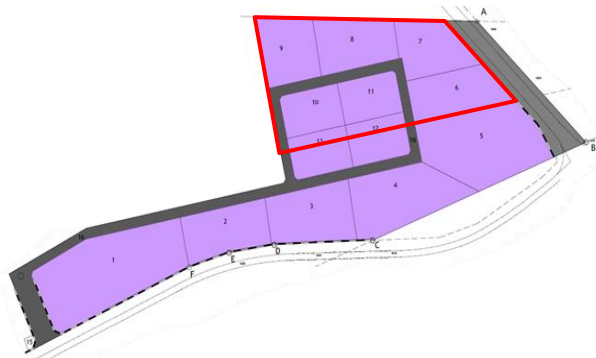


Figure 3: Proposed erven for RE of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS (Korsman & Associates, 2021).

ZONING	NO OF ERVEN	TOTAL (HA)	TOWN COVERAGE (%)
Industrial	8	6, 0824	46.70
Special erf – Private Cemetery	1	10, 0382	43.11
Private Road	1	0, 6750	7.05
Special for Refuse Area	1	0, 0341	0.10
Special for Water Reclamation Plant	1	0, 1338	0.39
Public Road	-	0, 6673	2.35
<b>TOTAL SITE COVERAGE</b>		<b>±17 Hectares</b>	

The proposed layout plan makes provision for 8 “Industrial 1” erven with a 6, 0824 Ha coverage and 1 “Special” zoned erf for a private cemetery with a 10, 0382 Ha coverage. A private road of approximately 0, 6750 Ha, a special for refuse area of 0, 0341 Ha and a special for water reclamation plant of 0, 1338 Ha will also be constructed.

- **Industrial Erven**



Erven will consist of an average size of 1ha and will be zoned as “Industrial 1” (due to the demand for small, light industrial erven within the Naauwpoort area). The erven will allow for increased mobility for especially heavy industrial vehicles within the township.

- **Special Erf – Private Cemetery**



A portion of the site will be utilized for a privately managed Memorial Park. The cemetery will provide easy accessibility from the main access point.

Extent of grave: 2m x 1m (2,3m x 0,9m) = 2m<sup>2</sup>. Extent of grave and space for movement: 3m x 2m = 6m<sup>2</sup>.

Considering the provision of amenities and the approach of the cemetery as a park, the space per grave will be between 8 and 10m<sup>2</sup>.

**Land Requirements:**

At 1000 deaths per 100 000 population per annum (with a rounding to death rate of 1%), 6000m<sup>2</sup> grave space will be required per annum. Over the next 30 years, this will equate to 18ha of land required. Alternatively, at 656 deaths per 100 000 population per annum, 3936m<sup>2</sup> grave space will be required per annum. Over the next 30 years, this will equate to 11,8ha of land required.

The project property is 17, 0798 hectares in total. Should the development be approved, will the proposed developmental footprint (project site) be approximately 17, 0798 hectares.

### 5.1.1 Roads and Storm Water

#### Access

Access to the proposed site will be via Portion 439 (A Portion of Portion 49) of the Farm Naauwpoort 335 JS, from the D2257 (P120/1) road. A “Full” access will be from the D2257 road and will be the only access point available. The proposed access point will require 2 lanes “IN” and 2 lines “OUT”. The proposed access also allows for sufficient queueing distance in front of any security boom or gate with a minimum of 66m from the security boom to the edge of the road. The entrance is placed on that specific location as the Mpumalanga Roads Agency only allows for entrances 500 metres or further from a major intersection. The entrance point is also already approved by the Mpumalanga Roads Agency. Additionally, affected intersections will be upgraded and signalized.



Figure 4: Proposed Site Access (Korsman & Associates, 2021).

### Surface Drainage/ Stormwater Routing

There exists no formal stormwater drainage system on the proposed site since the site is still undeveloped. As a result of the site being undeveloped, the stormwater flows on the surface. As per investigations done by the civil engineers for the proposed project, SCIP Engineering Group, an estimated 9,4 m<sup>3</sup>/s (peak flow rate) for a return period of 1:5 years can be expected. The stormwater run-off will be drained by the construction of kerb inlets on the proposed road. Water will then be transported via pipes and discharged on the southern boundary of the site (Korsman & Associates, 2021).



Figure 5: Stormwater Layout (SCIP Engineering Group, 2021)

### 5.1.2 Water Services

There exists no water supply infrastructure on the proposed site since the site is still undeveloped. The surrounding areas also contains no bulk water supply infrastructure. The closest available system is located approximately 2,3km away from the proposed project site in Duvha Park. As per the Civil Services Report for the proposed project, done by SCIP Engineering Group, the site does contain a borehole (groundwater resource) (Korsman & Associates, 2021).

A borehole is present on the project site and was tested by Regent Waters Laboratory in order to determine the capacity thereof (A borehole test will also need to be performed by a registered hydrogeologist to ensure quantitative testing under the correct standards).

Due to the type of zoning, the proposed development is classified as a “High-risk” area for firefighting. Due to the unavailability of water resources within the area, it is proposed that water storage facilities for firefighting purposes be constructed. According to the Civil Services Report (2021), the total volume of water storage needed for the proposed development is 6693m<sup>3</sup>. The minimum design fire flow for high-risk areas is 12 000l/min and the duration of design fire flow is 6 hours for the proposed development.

### 5.1.3 Waste

#### Domestic Waste

Domestic waste generated on the premises will be removed and disposed of at a licensed municipal waste facility.

#### Hazardous Waste

Hazardous waste generated on the premises will be stored in appropriate containers and disposed of at a licensed municipal waste facility.

### 5.1.4 Sewerage

No existing sewerage network is present on the proposed site. There are also no formal sewerage infrastructure near the proposed site. The closest WWTW (Waste Water Treatment Works) to the proposed site is situated opposite the Olifants river approximately 2km north of the site. Due to the availability of a main sewer system in the area, the construction of a sewage package plant is proposed. The sewage package plant will be designed with a minimum capacity of 9 l/s (777,6kl/day) to adequately handle the sewage production caused by the proposed development.

### 5.1.5 Electricity

According to the Civil Services Report, by DS Field Services, the proposed project site lies within an Eskom distribution area and is the provision of electricity from the local authority not required. On the project site is an Eskom point pole number: IF1698 3/7. Additional Eskom infrastructure situated in close proximity to the proposed site is an Eskom pole situated on stand 439 labelled “LAL 4/18/2A” and “LAL 4/12A”.

The proposed development will be affected by one servitude registered over several properties and is described as:

- Servitude of 117m wide over Erven 1, 14 and 16 in favour of Eskom in order to accommodate an Eskom Power Line. Erf 14 falls within the proposed project site.

The proposed site requires an Eskom supply/connection point of 650kVA at a convenient position in order to supply electricity to the proposed development. Electricity is not required for "Special" zoned areas such as the cemetery or refuse areas as this types or areas usually does not require power (Korsman & Associates, 2021).

### 5.1.6 Traffic

A Traffic Study, conducted by EDL Engineers (Pty) Ltd, concluded that the following roads are relevant to the proposed project site:

- R544 Main Road;
- D2257 Road;
- D2771 Road; and
- D2769 Road.

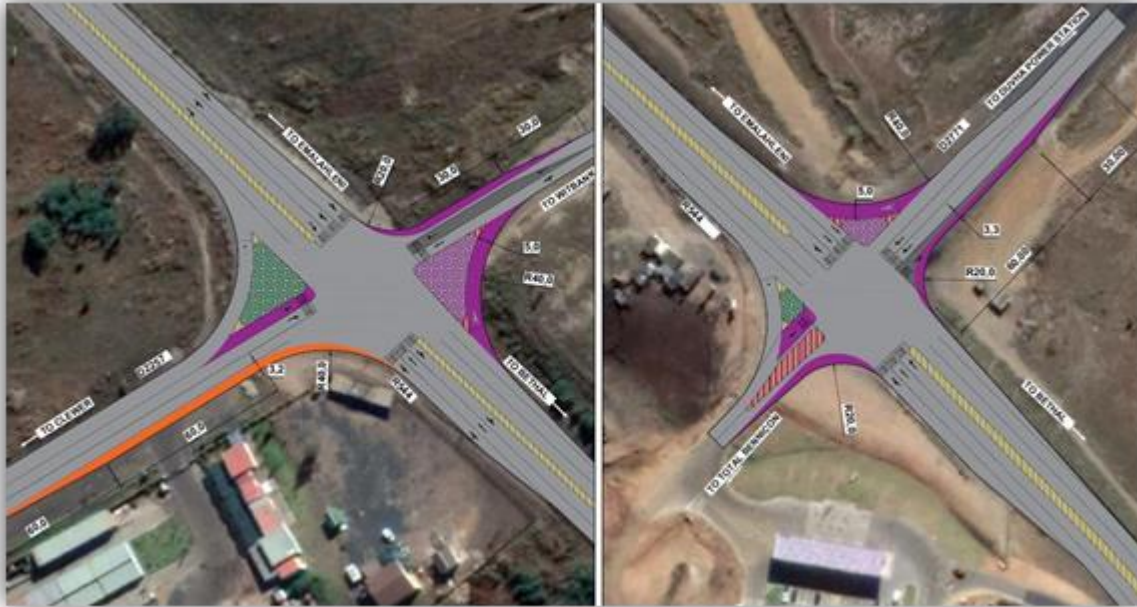


Figure 6: Surrounding Road Network (Korsman & Associates, 2021).

As per the Traffic Impact Study conducted by EDL Consulting Engineers, the proposed mixed use development will generate a total of approximately 796vph during weekday mornings and 796vph during weekday afternoon peak hours. The site will be accessed via an entrance located on the D2257 road (Korsman & Associates, 2021).



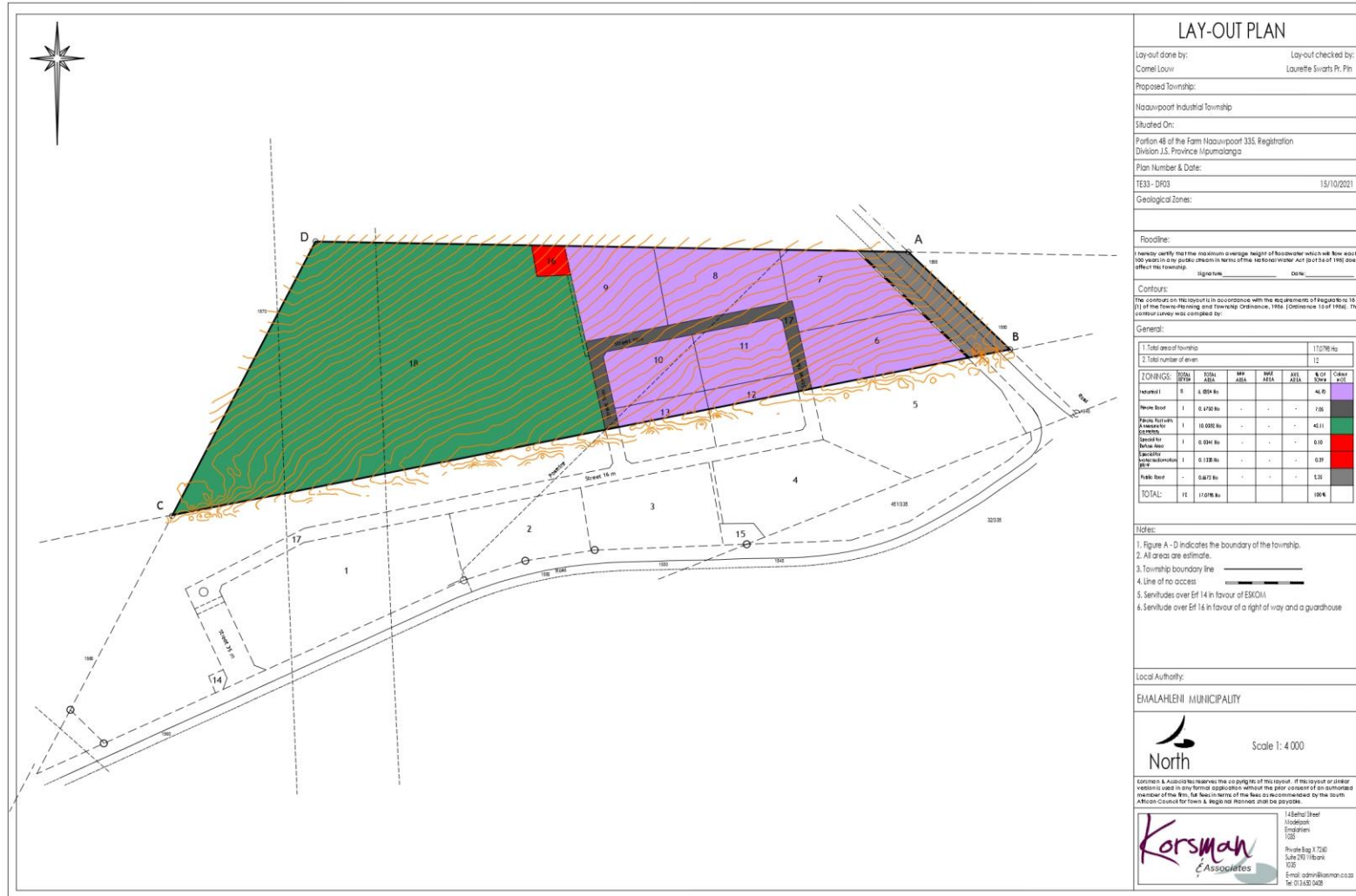


Figure 7: Proposed Site Layout Plan

## 5.2 Listed Activities triggered by the proposed development

The following listed activities are triggered by the proposed development and therefore require Environmental Authorisation, in terms of the Environmental Impact Assessment Regulations of 4 December 2014, as amended:

Table 1: Listed activity/activities triggered by the proposed development

Government Notice and Activity Number	Wording as per the Listing Notice	Description as per the project description relating to each listed activity
<b>Government Notice R983 (Listing Notice 1)</b>		
Government Notice R983 (Listing Notice 1), Activity No. 23, as amended.	<i>The development of cemeteries of 2500 square metres or more in size.</i>	The development of a 100 382m <sup>2</sup> (10, 0382Ha) cemetery.
Government Notice R983 (Listing Notice 1), Activity No. 27, as amended.	<i>The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for (i) the undertaking of a linear activity; or (ii) maintenance purposed undertaken in accordance with a maintenance management plan</i>	The clearance of an area of 17, 6Ha (170 798m <sup>2</sup> ) of indigenous vegetation.
Government Notice R983 (Listing Notice 1), Activity No. 28, as amended.	<i>Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area where the total land to be developed is bigger than 1 hectare; Excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.</i>	Industrial development that (ii) will occur outside an urban area where the total land to be developed is bigger than 1 hectare; total area of land to be developed is 7, 0416Ha (70 416m <sup>2</sup> ).
<b>Government Notice R984 (Listing Notice 2)</b>		
No activities triggered in Government Notice R984, as amended (Listing Notice 2)		
<b>Government Notice R985 (Listing Notice 3)</b>		
No activities triggered in Government Notice R985, as amended (Listing Notice 3)		

## 5.3 Potential Environmental Licensing Required

### 5.3.1 Water Use Licence Activities

## **Groundwater**

The following proposed water uses require Water Use Registration and/or Licence applications in terms of Chapter 4 of the National Water Act, 1998 (Act No. 36 of 1998):

- Section 21(a): Taking water from a water resource – the abstraction of groundwater from boreholes onsite;
- Section 21(b): Storage of water – the storage of clean water in a number of storage tanks; and
- Section 21(f): Discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall or other conduit.

The required Water Use Registration and/or Licence application will be submitted to the Department of Water and Sanitation in due course.

### **5.3.2 Waste**

*As per GN 921 of 29 November 2013, and as amended on 11 October 2017, the Department of Environmental Affairs published a list of waste management activities that have, or are likely to have, a detrimental effect on the environment and in respect of which a waste management license may then be required in accordance with Section 20(b) of the National Environmental Management: Waste Act, 2008 (Act no. 59 of 2008),*

A Waste Management License may be a possibility in the future, depending on the quantity of waste that will be stored, recycled, treated or disposed of onsite.

## 6. POLICY AND LEGISLATIVE CONTEXT OF THE APPLICATION

The following legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments are applicable to the proposed development and have been considered in this Basic Environmental Impact Assessment process.

### Legislation

<p><b>The Constitution of South Africa, 1996 (Act No. 108 of 1996), as amended</b></p> <ul style="list-style-type: none"> <li>To establish a Constitution with a Bill of Rights for the RSA.</li> </ul>
<p><b>The National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended</b></p> <ul style="list-style-type: none"> <li>To provide for the integrated management of the environment, and to regulate the 'Duty of Care' Principle.</li> </ul>
<p><b>The Environmental Impact Assessment Regulations of 4 December 2014, as amended</b></p> <ul style="list-style-type: none"> <li>To regulate and control the authorisation of certain listed activities.</li> </ul>
<p><b>The National Heritage Resources Act, 1999 (Act No. 25 of 1999), as amended</b></p> <ul style="list-style-type: none"> <li>To introduce an integrated and interactive system for the management of the national heritage resources.</li> </ul>
<p><b>The National Appeal Regulations</b> – Government Notice No. R.993 of 8 December 2014</p>
<p><b>Promotion of Access to Information Act, 2000 (Act No 2 of 2000 as amended)</b></p> <ul style="list-style-type: none"> <li>To give effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or protection of any rights.</li> </ul>
<p><b>The National Water Act, 1998 (Act No. 36 of 1998), as amended</b></p> <ul style="list-style-type: none"> <li>To provide for fundamental reform of the law relating to water resources</li> </ul>
<p><b>The National Environmental Management: Waste Act (Act No. 59 of 2008)</b></p> <ul style="list-style-type: none"> <li>To reform the law regulating waste management in order to protect health and the environment by providing reasonable measures for the prevention of pollution and ecological degradation.</li> </ul>
<p><b>The National Environmental Management: Air Quality (Act No. 39 of 2004)</b></p> <ul style="list-style-type: none"> <li>To reform the law regulating air quality to protect the environment by providing reasonable measures for the prevention of pollution. To provide for national norms and standards regulating air quality monitoring, management and control.</li> </ul>
<p><b>The Environment Conservation Act, 1989 (Act No. 73 of 1989)</b></p> <ul style="list-style-type: none"> <li>To control environmental conservation.</li> </ul>

### Plans

Mpumalanga Biodiversity Sector Plan, 2014

### Guidelines

Guideline on Need and Desirability in terms of the Environmental Impact Assessment (EIA) Regulations, 2010

Guideline on Public Participation in the Environmental Impact Assessment Process, 2012

### Spatial Tools

SANBI Biodiversity GIS Database

National Web Based Environmental Screening Tool

## Provincial Development Planning Frameworks

Mpumalanga Spatial Development Framework, 2017, as amended (2018)
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## Municipal Development Planning Frameworks

Emalahleni Local Municipality – Spatial Development Framework, 2015
Emalahleni Local Municipality – Integrated Development Plan, 2018/2019
Emalahleni Local Municipality – Integrated Development Plan, 2021/2022
Emalahleni Local Municipality – Local Economic Development Strategy, 2011-2016
Emalahleni Local Municipality Socio Economic Review and Outlook, 2017

## 7. MOTIVATION FOR THE NEED AND DESIRABILITY OF THE PROPOSED DEVELOPMENT

### 7.1 Need and desirability of the development in the context of the preferred location

#### 7.1.1 The Applicant

The term 'industrialization' is utilized to depict the advancement of an industry. However, Hewitt et al (1992) states that industrialization can be characterized in a number of ways. Firstly, industrialization can be defined as the production of material goods excluding agriculture. Secondly, it can be characterised as being made up of the energy, manufacturing and mining sectors. Hewitt et al (1992) states that this classification is "defined in terms of the kind of output, not how the goods are made". A third classification of industrialization refers to how goods are made and is focussed on the production processes. Therefore, industrialization is not just defined as moving away from agriculture to the production of other goods, or focussing just on the production of particular goods. Industrialization also includes the process by which these goods are made (Green, 2009). Industrialization forms an integral part in the economy of a country, as an increase in a country's commercial capacity leads to increased economic development. By accomplishing industrialization in a sustainable manner, an increase in living standards, income, working conditions and education can be attained (EUROPEAN COMMISSION Environment fact sheet: industrial development, 2006). Small industrial erven within Emalahleni has become an increasing need with ±379,3 hectares of land that needs to be provided by 2030 in order to accommodate the growing population within the local municipality and surrounding areas. Additionally, a need for industrial development of small industrial erven in the Naauwpoort Industrial Area is also becoming more prevalent (Emalahleni IDP 2021/22).

Along with industrialization comes a competing demand in space for cemeteries. For the average human being death is the most common connection to a cemetery and does a cemetery not only function as a memorial area, but also as a place where cultural heritage and the history of specific places are presented (Pliberšek and Vrban, 2018). The need to explore alternative burial methods have become crucial in the planning space of the Emalahleni Local Municipality (Emalahleni Local Municipality, n. d) and with the increase in populations over the last century, the integration of cemeteries into the urban landscape has become prominent (Pliberšek and Vrban, 2018). According to the Emalahleni SDF 2015/16, there are only two (2) cemeteries that service the Emalahleni urban area and both which has almost reached its capacity. It is therefore crucial to identify land suitable for the development for additional cemeteries in order to meet the demand for burial space within Emalahleni.

The applicant, Cuberman (Pty) Ltd, identified the need for industrial development in the form of small, industrial erven within the Naauwpoort industrial area as well as the development of a cemetery (privately managed memorial park), fulfilling a need the local municipality has trouble to fulfil. The proposed industrial park will contribute towards the industrial attributes of Emalahleni, creating employment opportunities and overall strengthening the local economy while the private memorial park will create additional burial space and efficiency through self-maintenance.

The economic, social as well as environmental sustainability factors will be considered with the proposed design, technology and process relating to the mixed use development.

#### 7.1.2 The Local Community

Emalahleni is the primary activity node within the Nkangala District Municipality and serves the high order needs of the entire town and its associated communities, as well as the surrounding rural areas. In order for Emalahleni to serve the local population (which makes up approximately 76% of the municipal population), it is proposed that a number of decentralised, lower activity nodes be established (Emalahleni SDF, 2015).

According to the Emalahleni SDF (2015), "In line with the nodal development philosophy for the MSDF, it is proposed that the bulk of economic activities (retail, office, commercial) and community facilities be consolidated at the identified activity

nodes, in line with the proposed local nodal hierarchy. This approach will lead to an increase in the number of destinations/anchors per node, together with an increase in land use intensity”.

A number of 150 temporary job opportunities for unskilled labourers during the construction phase and 100 permanent job opportunities during the operational phase will be created as a result of the proposed development. The proposed development will also promote economic development as it is situated along the R544 main road making it easily accessible and visible for the clients and employees of the proposed businesses.

### **7.1.3 District and Provincial Benefit**

One of the key principles outlined in the Nkangala District Municipal SDF 2014 is *"To concentrate industrial and agro-processing activities at higher order nodes likes Emalahleni and Steve Tshwete in the District where infrastructure is available."* Emalahleni is characterized as an industrial hub where most of the industrial activities of the Nkangala District is concentrated. As a result the proposed development will contribute towards the industrial attributes within Emalahleni, create employment opportunities and strengthen the economy.

As per the Mpumalanga Human Settlement Master Plan (as outlined in the Mpumalanga SDF, 2019), Strategic Objective 2 reads: *"Promote Sustainable Human Settlements within Mpumalanga by Focussing on Mixed Land Use, -Typology, -Income and -Tenure Developments in the Province."* The Master Plan also supports the idea of mixed income and mixed use developments. Since the proposed development entails the development of both industrial erven and a private memorial park, mixed land use is promoted and supports the idea of mixed income within the Mpumalanga Province.

## **7.2 Need and Desirability in terms of the Guideline on Need and Desirability**

The Department of Environmental Affairs published a Guideline on Need and Desirability in terms of the Environmental Impact Assessment (EIA) Regulations, 2010, in Government Notice 891 of 2014 (20 October 2014).

The table below indicates how the guideline requirements have been addressed.

Table 2: Need and desirability of the proposed project, in terms of the Guideline on Need and Desirability

Requirement	Part where requirement is addressed/response
<p>1. How will this development (and its separate elements/aspects) impact on the ecological integrity of the area?<sup>1</sup></p>	<p>According to the Mpumalanga Biodiversity Sector Plan, the proposed site is “CBA Optimal”, “Moderately Modified” as well as “Moderately Modified”. The Terrestrial CBA Map further indicates that the project site is designated as of “Least Concern” with areas of “No Natural Habitat Remaining”.</p> <p>The impact of the proposed development on the ecological integrity of the project property has been assessed in Section 9.3 of this report.</p>
<p>1.1. How were the following ecological integrity considerations taken into account?</p>	
<p>1.1.1 Threatened Ecosystems.<sup>2</sup></p>	<p>The historical vegetation type of the project site was Eastern Highveld Grassland. This vegetation type is considered as “Endangered”. However, according to the Mpumalanga Biodiversity Sector Plan, the proposed site is “CBA Optimal”, “Moderately Modified” as well as “Moderately Modified”. The Terrestrial CBA Map further indicates that the project site is designated as of “Least Concern” with areas of “No Natural Habitat Remaining”.</p> <p>The impact of the proposed development on the disturbed Eastern Highveld Grassland has been assessed in Section 9.3 of this report.</p>
<p>1.1.2 Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure.<sup>3</sup></p>	<p>According to the Hydrology Map, there are no wetlands present or near the proposed project site.</p>
<p>1.1.3 Critical Biodiversity Areas (“CBAs”) and Ecological Support Areas (“ESAs”).</p>	<p>According to the Mpumalanga Biodiversity Sector Plan, the proposed site is “CBA Optimal”, “Moderately Modified” as well as “Moderately Modified”.</p>

<sup>1</sup> Section 24 of the Constitution and section 2(4)(a)(vi) of NEMA refer.

<sup>2</sup> Must consider the latest information including the notice published on 9 December 2011 (Government Notice No. 1002 in Government Gazette No. 34809 of 9 December 2011 refers) listing threatened ecosystems in terms of Section 52 of National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004).

<sup>3</sup> Section 2(4)(r) of NEMA refers.



Requirement	Part where requirement is addressed/response
1.1.4 <i>Conservation targets.</i>	<p>According to Carbutt et al., 2011, 36.7% of the Grassland Biome is classified as important for biodiversity conservation.</p> <p>However, according to the Mpumalanga Biodiversity Sector Plan, the proposed site is “<i>CBA Optimal</i>”, “<i>Moderately Modified</i>” as well as “<i>Moderately Modified</i>”. The Terrestrial CBA Map further indicates that the project site is designated as of “Least Concern” with areas of “<i>No Natural Habitat Remaining</i>”.</p>
1.1.5 <i>Ecological drivers of the ecosystem.</i>	<p>Mitigation measures have been incorporated into the Environmental Management Programme for this project. The measures will aim to mitigate the influence of ecological drivers such as the influence of uncontrolled fires, human activity and alien invasive plant species.</p>
1.1.6 <i>Environmental Management Framework.</i>	<p>No EMF could be found for the Emalahleni Local Municipality.</p>
1.1.7 <i>Spatial Development Framework.</i>	<p>The SDF of Emalahleni finds it evident that a focus must be placed on efficient service delivery, participative planning and ultimately creating an environment conducive to social development and economic growth.</p> <p>The proposed development is in line with the SDF as it will contribute to social development through the creation of employment opportunities, service delivery in the form of industrial services as well as burial services and will ultimately stimulate the local economy of Emalahleni.</p>
1.1.8 <i>Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.).<sup>4</sup></i>	<p>The proposed activity do not have significant contributions towards global and international responsibilities.</p>
1.2 How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity? What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether,	<p>According to the Mpumalanga Biodiversity Sector Plan, the proposed site is “<i>CBA Optimal</i>”, “<i>Moderately Modified</i>” as well as “<i>Moderately Modified</i>”. The Terrestrial CBA Map further indicates that the project site is designated as of “Least Concern” with areas of “<i>No Natural Habitat Remaining</i>”.</p>

<sup>4</sup> Section 2(4)(n) of NEMA refers.

Requirement	Part where requirement is addressed/response
<p>what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?<sup>5</sup></p>	<p>The impact of the proposed development on ecosystems and biological diversity has been assessed in Section 9.3 of this report. Mitigation measures have also been identified and recommended in the EMP to mitigate negative environmental impacts.</p>
<p>1.3 How will this development pollute and/or degrade the biophysical environment? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?<sup>6</sup></p>	<p>Potential negative environmental impacts associated with the proposed development have been identified and assessed in Section 9.3 of this report. Mitigation measures have also been identified and recommended in the EMP to mitigate negative environmental impacts.</p> <p>The main positive impacts of the proposed development is the generation of employment opportunities, contribution/ expansion to the industrial sector of Emalahleni, providing social services (burial services) and ultimately the stimulation of the local economy. To enhance the positive impacts, local people will be employed during the construction and operational phases of the development, as far as possible.</p>
<p>1.4 What waste will be generated by this development? What measures were explored to firstly avoid waste, and where waste could not be avoided altogether, what measures were explored to minimise, reuse and/or recycle the waste? What measures have been explored to safely treat and/or dispose of unavoidable waste?<sup>7</sup></p>	<p>During the construction phase of the proposed development, general waste, such as building rubble and domestic waste will be generated. Some hazardous waste, such as spilt oil or diesel (from vehicles/machinery/equipment) may also be generated.</p> <p>During the operational phase of the proposed development, general waste such as domestic will be generated. Some hazardous waste, such as spilt oil or diesel (from vehicles/machinery/equipment) may also be generated.</p> <p>Mitigation measures to minimise, reuse and/or recycle the waste has been recommended in the Environmental Management Programme for the project.</p>

<sup>5</sup> Section 24 of the Constitution and Sections 2(4)(a)(i) and 2(4)(b) of NEMA refer.

<sup>6</sup> Section 24 of the Constitution and Sections 2(4)(a)(ii) and 2(4)(b) of NEMA refer.

<sup>7</sup> Section 24 of the Constitution and Sections 2(4)(a)(iv) and 2(4)(b) of NEMA refer.

Requirement	Part where requirement is addressed/response
<p>1.5 How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?<sup>8</sup></p>	<p>It is not expected for the proposed development to have an impact upon landscapes and/or sites that constitute the nation's cultural heritage. The proposed development entails the removal of approximately 17,6ha (170 798m<sup>2</sup>) of indigenous vegetation. The project property is approximately 17,6ha (170 798m<sup>2</sup>) in total.</p> <p>According to the National Heritage Resources Act, 1999 (Act No. 25 of 1999), developments that will change the character of a site by more than 5 000m<sup>2</sup> must be brought under the attention of the South African Heritage Resources Agency (SAHRA). Such developments may then require a Heritage Impact Assessment to be conducted (as required by SAHRA). The part of the project property (the site) that will be changed as part of the proposed development is more than 5 000m<sup>2</sup> and a Phase 1 Heritage Impact Assessment may be required for the project site. SAHRA has, however, been notified of the proposed development as part of the general public participation process, seeing as SAHRA is considered to be an Interested and Affected Party of the proposed project, irrespective of the fact that a Heritage Impact Assessment is required or not for the proposed development.</p>
<p>1.6 How will this development use and/or impact on non-renewable natural resources? What measures were explored to ensure responsible and equitable use of the resources? How have the consequences of the depletion of the non-renewable natural resources been considered? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?<sup>9</sup></p>	<p>The proposed development will likely use small amounts of one or more of the following non-renewable natural resources during the construction phase: diesel, petrol and/or LPG. This includes, for example, diesel and petrol used in construction vehicles. No direct usage of non-renewable natural resources is anticipated during the operational phase of the proposed development.</p> <p>Mitigation measures have been recommended in the Environmental Management Programme for this proposed development, to minimise the use of non-renewable natural resources.</p>

<sup>8</sup> Section 24 of the Constitution and Sections 2(4)(a)(iii) and 2(4)(b) of NEMA refer.

<sup>9</sup> Section 24 of the Constitution and Sections 2(4)(a)(v) and 2(4)(b) of NEMA refer.

Requirement	Part where requirement is addressed/response
<p>1.7 How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part? Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds? What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources? What measures were taken to ensure responsible and equitable use of the resources? What measures were explored to enhance positive impacts?<sup>10</sup></p>	<p>The proposed development will not use or impact upon any renewable natural resources.</p>
<p>1.7.1 <i>Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth or does it reduce resource dependency (i.e. de-materialised growth)? (note: sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life)</i></p>	<p>It is not expected for the proposed development to exacerbate the increased use of resources to maintain economic growth. By accommodating the proposed project on the proposed farm portion, both social (employment opportunities) and economic (economy growth) development will be exalted.</p>
<p>1.7.2 <i>Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra- and intergenerational equity, and are there more important priorities for which the resources should be used (i.e. what are the opportunity costs of using these resources this the proposed development alternative?)</i></p>	<p>The resource use is justifiable and should not affect intra- and intergenerational equity. Mitigation measures have also been recommended in the Environmental Management Programme for this proposed development, to minimise the use of resources.</p>
<p>1.7.3 <i>Do the proposed location, type and scale of development promote a reduced dependency on resources?</i></p>	<p>Yes. The proposed development will create both commercial, social (burial) and industrial services in an already established industrial node (Naaupoort Industrial Area) and may decrease the distance that consumers need to travel. This will indirectly decrease the use of resources (the fuel that the vehicles consume).</p>
<p>1.8 How were a risk-averse and cautious approach applied in terms of ecological impacts?<sup>11</sup></p>	<p>According to the Mpumalanga Biodiversity Sector Plan, the proposed site is “CBA Optimal”, “Moderately Modified” as well as “Moderately Modified”. The Terrestrial CBA Map further indicates that the project site is designated as of “Least Concern” with areas of “No Natural Habitat Remaining”.</p>

<sup>10</sup> Section 24 of the Constitution and Sections 2(4)(a)(vi) and 2(4)(b) of NEMA refer.

<sup>11</sup> Section 24 of the Constitution and Section 2(4)(a)(vii) of NEMA refer.

Requirement	Part where requirement is addressed/response
	<p>Having the proposed development on land that has historically been modified/disturbed has a lower ecological impact (is risk averse) and is preferable to locating the proposed development on an undisturbed site. Refer also to Section 9.3 of this report.</p>
<p>1.8.1 <i>What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?</i></p>	<p>The following assumptions have been made:</p> <ul style="list-style-type: none"> <li>• That all research and reference sources or material is accurate and up to date;</li> <li>• That the project information, as provided by the applicant, is correct;</li> <li>• That the proposed development will be constructed as per the layout plans supplied from the applicant; and</li> <li>• That the development will be operated according to the Environmental Management Programme and in a responsible manner.</li> </ul> <p>At this stage, the fossil assemblages that may possibly be present beneath the project site are unknown. This will be determined during the Field Assessment that will be undertaken during commencement of the construction phase of the proposed project.</p>
<p>1.8.2 <i>What is the level of risk associated with the limits of current knowledge?</i></p>	<p>It is Labesh's opinion that the level of risk associated with the limits of current knowledge is <i>low</i>.</p>
<p>1.8.3 <i>Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?</i></p>	<p>A risk-averse and cautious approach was applied to the Basic Environmental Impact Assessment by keeping in mind the gaps in knowledge and limitations.</p>
<p>1.9 How will the ecological impacts resulting from this development impact on people's environmental right in terms following:<sup>12</sup></p>	
<p>1.9.1 <i>Negative impacts: e.g. access to resources, opportunity costs, loss of amenity (e.g. open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc. What measures were taken to firstly avoid negative</i></p>	<p>Section 8.4 of this report provides a list of the anticipated impacts from the proposed development. Section 8.7 provides some mitigation measures for these impacts and the Environmental Management Programme for the</p>

<sup>12</sup> Section 24 of the Constitution and Sections 2(4)(a)(viii) and 2(4)(b) of NEMA refer.

Requirement	Part where requirement is addressed/response
<i>impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</i>	proposed development provides further detailed mitigation measures that should be applied to minimise the impacts on the environment from the development.
1.9.2 <i>Positive impacts: e.g. improved access to resources, improved amenity, improved air or water quality, etc. What measures were taken to enhance positive impacts?</i>	The main positive impacts of the proposed development is the generation of employment opportunities, contribution/ expansion to the industrial sector of Emalahleni, provision of social services (burial facilities) and ultimately the stimulation of the local economy. To enhance the positive impacts, local people will be employed during the construction and operational phases of the development, as far as possible.
1.10 Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socio-economic impacts (e.g. on livelihoods, loss of heritage site, opportunity costs, etc.)?	It is not expected for the proposed development to result in socio-economic impacts relating to livelihoods, loss of heritage sites and/or opportunity costs.
1.11 Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives/targets/considerations of the area?	Refer to Section 9.3 of this report.
1.12 Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the "best practicable environmental option" in terms of ecological considerations? <sup>13</sup>	Refer to Section 8.1 of this report.
1.13 Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and existing and other planned developments in the area? <sup>14</sup>	Refer to Section 9.3 of this report.
2.1 What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?	

<sup>13</sup> Section 2(4)(b) of NEMA refer.

<sup>14</sup> Regulations 22(2)(i)(j), 28(1)(g) and 31(2)(1) in Government Notice No. R. 543 refer.

Requirement	Part where requirement is addressed/response
<p>2.1.1 <i>The IDP (and its sector plans' vision, objectives, strategies, indicators and targets) and any other strategic plans, frameworks of policies applicable to the area,</i></p>	<p>One of the key performance areas identified by the Emalahleni Local Municipality IDP 2018/19 is to ensure for local economic development. Additionally, one of the five municipal goals is to ensure for spatial transformation and social cohesion.</p> <p>The proposed development will contribute to local economic development as well as spatial transformation and social cohesion as it will create opportunities for both commercial and industrial services as well as burial services in an already established industrial node (Naauwpoort Industrial Area).</p>
<p>2.1.2 <i>Spatial priorities and desired spatial patterns (e.g. need for integrated of segregated communities, need to upgrade informal settlements, need for densification, etc.),</i></p>	<p>The proposed development is in line with the Emalahleni Local Municipality Integrated Development Plan (IDP) 2018/19, as discussed previously under point 2.1.1</p>
<p>2.1.3 <i>Spatial characteristics (e.g. existing land uses, planned land uses, cultural landscapes, etc.), and</i></p>	<p>The proposed development is in line with the Emalahleni Local Municipality Integrated Development Plan (IDP) 2018/19, as discussed previously under point 2.1.1</p>
<p>2.1.4 <i>Municipal Economic Development Strategy ("LED Strategy").</i></p>	<p>Some of the strategic objectives presented in the Emalahleni Local Economic Development Strategy (2011-2016), is to:</p> <ul style="list-style-type: none"> <li>• Ensure Economic Sector Growth and Development; and</li> <li>• Socio-Economic Development</li> </ul> <p>The proposed development addresses the following, as also identified in the municipality's LED Strategy:</p> <ul style="list-style-type: none"> <li>• Ensuring economic sector growth and development through stimulation of the local economy (establishing commercial and industrial services within an already established industrial node); and</li> <li>• Ensuring socio-economic development through job creation and the provision of burial services to the local community.</li> </ul>

Requirement	Part where requirement is addressed/response
	<p>The proposed development is therefor in line with the goals of the municipality's LED Strategy.</p>
<p>2.2 Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area?</p>	<p>The following socio-economic impacts of the proposed development have been identified:</p> <ul style="list-style-type: none"> <li>• Generation of a number of job opportunities;</li> <li>• Provision of burial services to the local community; and</li> <li>• Potential increase in crime due to the influx of workers, especially during the construction phase.</li> </ul> <p>Job creation is a socio-economic objective of the area.</p>
<p>2.2.1 <i>Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?</i></p>	<p>Some of the strategic objectives presented in the Emalahleni Local Economic Development Strategy (2011-2016), is to:</p> <ul style="list-style-type: none"> <li>• Ensure Economic Sector Growth and Development; and</li> <li>• Socio-Economic Development</li> </ul> <p>The proposed development addresses the following, as also identified in the municipality's LED Strategy:</p> <ul style="list-style-type: none"> <li>• Ensuring economic sector growth and development through stimulation of the local economy (establishing commercial and industrial services within an already established industrial node); and</li> <li>• Ensuring socio-economic development through job creation and the provision of burial services to the local community.</li> </ul> <p>The proposed development is therefor in line with the goals of the municipality's LED Strategy.</p>
<p>2.3 How will this development address the specific physical, psychological, developmental, cultural and social needs and interests of the relevant communities?<sup>15</sup></p>	<p>The proposed development will address the following specific need of the community:</p>

<sup>15</sup> Section 2(2) of NEMA refers.



Requirement	Part where requirement is addressed/response
	<ul style="list-style-type: none"> <li>• The provision of employment opportunities.</li> <li>• The provision of burial services to the local community.</li> </ul>
<p>2.4 Will the development result in equitable (intra- and inter-generational) impact distribution, in the short- and long-term?<sup>16</sup> Will the impact be socially and economically sustainable in the short- and long-term?</p>	<p>It is expected for the proposed development to result in equitable impact distributions in the short- and long-term as well as to be socially and economically sustainable in the short- and long-term.</p>
<p>2.5 In terms of location, describe how the placement of the proposed development will:<sup>17</sup></p>	
<p>2.5.1 <i>result in the creation of residential and employment opportunities in close proximity to or integrated with each other,</i></p>	<p>It is estimated that the proposed development will generate 150 employment opportunities during the construction phase and 100 additional employment opportunities during the operational phase. This will include employment opportunities for local labourers.</p>
<p>2.5.2 <i>reduce the need for transport of people and goods,</i></p>	<p>It is not expected for the proposed development to have an impact upon the transportation of people or goods.</p>
<p>2.5.3 <i>result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport),</i></p>	<p>It is not expected for the proposed development to have an impact upon access to public transport or the enabling of non-motorised and pedestrian transport.</p>
<p>2.5.4 <i>compliment other uses in the area,</i></p>	<p>The predominant land uses in the area are commercial and industrial land uses. The proposed development therefore compliments the other uses in the area (the commercial and industrial land uses).</p>
<p>2.5.5 <i>be in line with the planning for the area,</i></p>	<p>The proposed development is in line with the development goals of the Emalahleni Local Municipality.</p>
<p>2.5.6 <i>for urban related development, make use of underutilised land available with the urban edge,</i></p>	<p>The proposed development is not an urban related development as it is the establishment of a new township for industrial use and a private memorial park. The proposed development falls outside the urban edge.</p>

<sup>16</sup> Sections 2(2) and 2(4)(c) of NEMA refers.

<sup>17</sup> Section 3 of the Development Facilitation Act, 1995 (Act No. 67 of 1995) ("DFA") and the National Development Plan refer.

Requirement	Part where requirement is addressed/response
2.5.7 <i>optimise the use of existing resources and infrastructure,</i>	Since the development is vacant land, no infrastructure exists on the site. Proposed stormwater, water, sewerage and road infrastructure has been proposed by relevant engineers.
2.5.8 <i>opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement),</i>	No new bulk infrastructure will be required for the proposed project.
2.5.9 <i>discourage "urban sprawl" and contribute to compaction/densification,</i>	The proposed development is not an urban related development as it is the establishment of a new township for industrial use and a private memorial park. The proposed development falls outside the urban edge.
2.5.10 <i>contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs,</i>	Since the development is vacant land, no infrastructure exists on the site. Proposed stormwater, water, sewerage and road infrastructure has been proposed by relevant engineers. It is not expected for the proposed development to have an effect on historically distorted spatial patterns of settlements.
2.5.11 <i>encourage environmentally sustainable land development practices and processes,</i>	Environmentally sustainable land development practices and processes are encouraged through specific mitigation measures that have been included in the Environmental Management Programme for this project.
2.5.12 <i>take into account special locational factors that might favour the specific location (e.g. the location of a strategic mineral resource, access to the port, access to rail, etc.),</i>	<p>The location for the proposed development is strategically ideal for the following reasons:</p> <ul style="list-style-type: none"> <li>• The property is situated within the Naauwpoort Industrial Node;</li> <li>• The property is situated approximately 15km south of Emalahleni;</li> <li>• The site is located next to a Provincial Road (R544);</li> <li>• The proposed development is in line with the Emalahleni Local Municipality Integrated Development Plan (IDP) 2018/19.</li> </ul>
2.5.13 <i>the investment in the settlement or area in question will generate the highest socio-economic returns (i.e. an area with high economic potential),</i>	Investment in the proposed development will result in socio-economic returns for the area. It is estimated that the development will generate 150

Requirement	Part where requirement is addressed/response
	employment opportunities during the construction phase and 100 employment opportunities during the operational phase.
<p>2.5.14 <i>impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area, and</i></p>	<p>It is not expected for the proposed development to have an impact upon history, sense of place, heritage of the area or the socio-cultural and cultural-historic characteristics and sensitivities of the area. The proposed development entails the removal of approximately 17,6ha (170 798m<sup>2</sup>) of indigenous vegetation. The project property is approximately 17,6ha (170 798m<sup>2</sup>) in total.</p> <p>According to the National Heritage Resources Act, 1999 (Act No. 25 of 1999), developments that will change the character of a site by more than 5 000m<sup>2</sup> must be brought under the attention of the South African Heritage Resources Agency (SAHRA). Such developments may then require a Heritage Impact Assessment to be conducted (as required by SAHRA). The part of the project property (the site) that will be changed as part of the proposed development is more than 5 000m<sup>2</sup> and a Phase 1 Heritage Impact Assessment may be required for the project site. SAHRA has, however, been notified of the proposed development as part of the general public participation process, seeing as SAHRA is considered to be an Interested and Affected Party of the proposed project.</p>
<p>2.5.15 <i>in terms of the nature, scale and location of the development promote or act as a catalyst to create a more integrated settlement?</i></p>	<p>The proposed development is not an urban related development as it is the establishment of a new township for industrial use and a private memorial park. The proposed development falls outside the urban edge.</p>
<p>2.6 How were a risk-averse and cautious approach applied in terms of socio-economic impacts?:<sup>18</sup></p>	<p>A risk-averse and cautious approach was applied to the Basic Environmental Impact Assessment by keeping in mind the gaps in knowledge and limitations.</p>

<sup>18</sup> Section 2(4)(a)(vii) of NEMA refers.

Requirement	Part where requirement is addressed/response
<p>2.6.1 <i>What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?<sup>19</sup></i></p>	<p>The following assumptions have been made:</p> <ul style="list-style-type: none"> <li>• That all research and reference sources or material is accurate and up to date;</li> <li>• That the project information, as provided by the applicant, is correct;</li> <li>• The proposed development will be constructed as per the layout plans supplied from the applicant; and</li> <li>• That the development will be operated according to the Environmental Management Programme and in a responsible manner</li> </ul> <p>At this stage, the fossil assemblages that may possibly be present beneath the project site are not known. This will be determined during the Field Assessment that will be undertaken during commencement of the construction phase of the proposed project.</p>
<p>2.6.2 <i>What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge?</i></p>	<p>It is Labesh's opinion that the level of risk associated with the limits of current knowledge is <i>low</i>.</p>
<p>2.6.3 <i>Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?</i></p>	<p>A risk-averse and cautious approach was applied to the Basic Environmental Impact Assessment by keeping in mind the gaps in knowledge and limitations.</p>
<p>2.7 How will the socio-economic impacts resulting from this development impact on people's</p>	<p>environmental right in terms following:</p>
<p>2.7.1 <i>Negative impacts: e.g. health (e.g. HIV-Aids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</i></p>	<p>It is not expected for the proposed development to impact significantly on people's health, safety and social ills.</p>
<p>2.7.2 <i>Positive impacts. What measures were taken to enhance positive impacts?</i></p>	<p>The main positive impacts of the proposed development is the generation of employment opportunities, contribution/ expansion to the industrial sector of Emalahleni, provision of social services (burial services) and ultimately the stimulation of the local economy. To enhance the positive impacts, local</p>

<sup>19</sup> Section 24(4) of NEMA refers.

Requirement	Part where requirement is addressed/response
	people will be employed during the construction and operational phases of the development, as far as possible.
2.8 Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socioeconomic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)?	The development's socio-economic impacts will indirectly result in the consumption of natural resources, such as water and diesel. However, the usage of the resources is not considered to be an over-utilisation.
2.9 What measures were taken to pursue the selection of the "best practicable environmental option" in terms of socio-economic considerations? <sup>20</sup>	Refer to Section 8.1 of this report.
2.10 What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)? <sup>21</sup> Considering the need for social equity and justice, do the alternatives identified, allow the "best practicable environmental option" to be selected, or is there a need for other alternatives to be considered?	Refer to Section 8.1 of this report. The alternatives considered allow for the "best practicable environmental option" to be selected.
2.11 What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination? <sup>22</sup>	Local labourers will be employed, as far as possible and up to certain skill levels, depending on the work involved.
2.12 What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle? <sup>23</sup>	To ensure that responsibility for the environmental health and safety consequences of the development has been addressed, mitigation measures have been identified in the Environmental Management Programme. The responsibility for implementing the mitigation measures lies with the applicant.
2.13 What measures were taken to:	

<sup>20</sup> Section 2(4)(b) of NEMA refers.

<sup>21</sup> Section 2(4)(c) of NEMA refers.

<sup>22</sup> Section 2(4)(d) of NEMA refers.

<sup>23</sup> Section 2(4)(e) of NEMA refers.

Requirement	Part where requirement is addressed/response
2.13.1 ensure the participation of all interested and affected parties,	<p>A public participation process was conducted, in accordance with the EIA Regulations, 2014, and also taking the following into consideration</p> <ul style="list-style-type: none"> <li>• GN 807 - Public Participation Guideline in the Environmental Impact Assessment Process, 2012; and</li> <li>• The Promotion of Access to Information Act (PAIA), 2000.</li> </ul>
2.13.2 provide all people with an opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, <sup>24</sup>	<p>The public participation process for this project is open to all parties. Site notices and a newspaper advertisement were placed to encourage participation from a wider audience than simply the adjacent land owners.</p>
2.13.3 ensure participation by vulnerable and disadvantaged persons, <sup>25</sup>	<p>The public participation processes were open to all individuals, also to vulnerable and disadvantaged persons.</p>
2.13.4 promote community wellbeing and empowerment through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means, <sup>26</sup>	<p>All employees, contractors and sub-contractors will be required to attend environmental awareness inductions (training).</p>
2.13.5 ensure openness and transparency, and access to information in terms of the process, <sup>27</sup>	<p>A public participation process was conducted, in accordance with the EIA Regulations, 2014, and also taking the following into consideration</p> <ul style="list-style-type: none"> <li>• GN 807 - Public Participation Guideline in the Environmental Impact Assessment Process, 2012; and</li> <li>• The Promotion of Access to Information Act (PAIA), 2000.</li> </ul> <p>The public participation process was open to participation from any members of the public and was a fully transparent process. All comments received from Interested and Affected Parties have been included in the reports for this</p>

<sup>24</sup> Section 2(4)(f) of NEMA refers.

<sup>25</sup> Section 2(4)(f) of NEMA refers.

<sup>26</sup> Section 2(4)(h) of NEMA refers.

<sup>27</sup> Section 2(4)(k) of NEMA refers.

Requirement	Part where requirement is addressed/response
	project and have also been responded to/addressed. The reports were available to any person wishing to review and comment upon the reports.
2.13.6 ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge <sup>28</sup> , and	<p>A public participation process was conducted, in accordance with the EIA Regulations, 2014, and also taking the following into consideration</p> <ul style="list-style-type: none"> <li>• GN 807 - Public Participation Guideline in the Environmental Impact Assessment Process, 2012; and</li> <li>• The Promotion of Access to Information Act (PAIA), 2000.</li> </ul>
2.13.7 ensure that the vital role of women and youth in environmental management and development were recognised and their full participation therein were be promoted? <sup>29</sup>	<p>A public participation process was conducted, in accordance with the EIA Regulations, 2014, and also taking the following into consideration</p> <ul style="list-style-type: none"> <li>• GN 807 - Public Participation Guideline in the Environmental Impact Assessment Process, 2012; and</li> <li>• The Promotion of Access to Information Act (PAIA), 2000.</li> </ul>
2.14 Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community (e.g. a mixture of low-, middle-, and high-income housing opportunities) that is consistent with the priority needs of the local area (or that is proportional to the needs of an area)? <sup>30</sup>	Local labourers will be employed, as far as possible and up to certain skill levels, depending on the work involved.
2.15 What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected? <sup>31</sup>	All employees, contractors and sub-contractors will be required to attend environmental awareness inductions (training). This will include informing workers that they have the right to refuse work should the work be harmful to human health or the environment.
2.16 Describe how the development will impact on job creation in terms of, amongst other aspects:	

<sup>28</sup> Section 2(4)(g) of NEMA refers.

<sup>29</sup> Section 2(4)(q) of NEMA refers.

<sup>30</sup> x

<sup>31</sup> Section 2(4)(j) of NEMA refers.

Requirement	Part where requirement is addressed/response
2.16.1 <i>the number of temporary versus permanent jobs that will be created,</i>	It is estimated that the proposed development will generate 150 temporary employment opportunities during the construction phase and 100 permanent employment opportunities during the operational phase. This will include employment opportunities for local labourers.
2.16.2 <i>whether the labour available in the area will be able to take up the job opportunities (i.e. do the required skills match the skills available in the area),</i>	Local labourers will be employed, as far as possible and up to certain skill levels, depending on the work involved.
2.16.3 <i>the distance from where labourers will have to travel,</i>	Labourers will be transported to and from the construction site. Using local labourers (as far as possible) will decrease travel distances.
2.16.4 <i>the location of jobs opportunities versus the location of impacts (i.e. equitable distribution of costs and benefits), and</i>	Employment opportunities will be created at the proposed development site.
2.16.5 <i>the opportunity costs in terms of job creation (e.g. a mine might create 100 jobs, but impact on 1000 agricultural jobs, etc.).</i>	The proposed development will create employment opportunities and should not impact upon employment opportunities in other sectors.
2.17 What measures were taken to ensure:	
2.17.1 <i>that there were intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment, and</i>	Relevant environmental and town planning legislation was considered and adhered to during the Environmental Impact Assessment and Land Use Rights processes. Also refer to Chapter 6 of this report.
2.17.2 <i>that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?</i>	There have been no such conflicts to resolve to date.
2.18 What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people's common heritage? <sup>32</sup>	<p>The proposed development is situated outside an urban area and is earmarked for industrial use. Ensuring that the environment (of the project site) is held in the public trust is therefore not deemed to be applicable to this proposed development.</p> <p>Mitigation measures will also be included in the Environmental Management Programme for this development to minimise the impacts of the proposed development on the environment.</p>

<sup>32</sup> Section 2(4)(o) of NEMA refers.



Requirement	Part where requirement is addressed/response
2.19 Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left? <sup>33</sup>	Realistic mitigation measures have been proposed in detail in the EMPr for this project. Should these mitigation measures be implemented by the applicant, it is not expected for there to be any long-term environmental legacy or burden.
2.20 What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment? <sup>34</sup>	The applicant will be responsible for any costs associated with the remediation of pollution, environmental degradation and consequent adverse health effects and for preventing, controlling or minimising further pollution, environmental damage or adverse health effects.
2.21 Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations? <sup>35</sup>	Refer to Section 8.1 of this report.
2.22 Describe the positive and negative cumulative socio-economic impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and other planned developments in the area? <sup>36</sup>	Cumulative impacts have been described and assessed in Section 9.3 of this report.

<sup>33</sup> Section 240(1)(b)(iii) of NEMA and the National Development Plan refer.

<sup>34</sup> Section 2(4)(p) of NEMA refers.

<sup>35</sup> Section 2(4)(b) of NEMA refers.

<sup>36</sup> Regulations 22(2)(i)(j), 28(1)(g) and 31(2)(1) in Government Notice No. R. 543 refer.

## 8. PROCESS FOLLOWED TO REACH THE PROPOSED PREFERRED ACTIVITY, SITE AND LOCATION WITHIN THE SITE

### 8.1 Alternatives considered

According to the Western Cape Department of Environmental Affairs and Development Planning's Guideline on Alternatives (2010), the following alternatives can be assessed:

Table 3: Alternative Types

Alternative Type	Explanation/Examples
Location	Refers to both alternative properties as well as alternative sites on the same property.
Activity	Incineration of waste rather than disposal at a landfill site/Provision of public transport rather than increasing the capacity of roads.
Design or Layout	Design: e.g. Different architectural and or engineering designs Site Layout: Consideration of different spatial configurations of an activity on a particular site (e.g. siting of a noisy plant away from residences).
Technological	Consideration of such alternatives is to include the option of achieving the same goal by using a different method or process (e.g. 1 000 megawatt of energy could be generated using a coal-fired power station or wind turbines).
Demand	Arises when a demand for a certain product or service can be met by some alternative means (e.g. the demand for electricity could be met by supplying more energy or using energy more efficiently, by managing demand).
Input	Input alternatives are applicable to applications that may use different raw materials or energy sources in their process (e.g. industry may consider using either high sulphur coal or natural gas as a fuel source).
Routing	Consideration of alternative routes generally applies to linear developments such as power line servitudes, transportation and pipeline routes.
Scheduling and Timing	Where a number of measures might play a part in an overall programme, but the order in which they are scheduled will contribute to the overall effectiveness of the end result.
Scale and Magnitude	Activities that can be broken down into smaller units and can be undertaken on different scales (e.g. for a housing development there could be the option of 10, 15 or 20 housing units. Each of these alternatives may have different impacts).
"No-Go Option"	This is the option of not implementing the proposed activity.

Alternative Assessments must always include the "No-Go Option" as the baseline against which all other alternatives must be measured. The following alternatives could be considered for the proposed project:

- Location – Alternative properties and alternative sites on the same property;
- Activity;
- Design or Layout;
- Scale and Magnitude; and
- "No-Go Option".

Alternatives were considered in a qualitative manner.

### 8.1.1 Location

#### Alternative properties

The proposed project property is owned by Cuberman (Pty) Ltd. The property is currently open, vacant land. No alternative properties have been identified since the suitability and feasibility of the project property for the proposed project is demonstrated by the following:

- The applicant owns Portion 439 (A Portion of Portion 49) of the Farm Naauwpoort 335 JS that located adjacent to the proposed property;
- The property is situated within the already established Naauwpoort Industrial Node and approximately 15km south of Emalaheni CBD;
- The surrounding land uses are occupied by both commercial and industrial land uses;
- The proposed development is in line with the Emalaheni Local Municipality Integrated Development Plan (IDP) 2018/19; and
- The site is located next to the R544 Provincial road, and is approximately 5km south of the N12 Highway.

#### Alternative sites on the same property

No alternative sites have been identified for the proposed mixed use development as the entire property will be used for the mixed use development comprising of light industrial facilities as well as a cemetery. According to the Mpumalanga Biodiversity Sector Plan, the proposed site is “*CBA Optimal*”, “*Moderately Modified*” as well as “*Moderately Modified*”. The Terrestrial CBA Map further indicates that the project site is designated as of “Least Concern” with areas of “*No Natural Habitat Remaining*”.

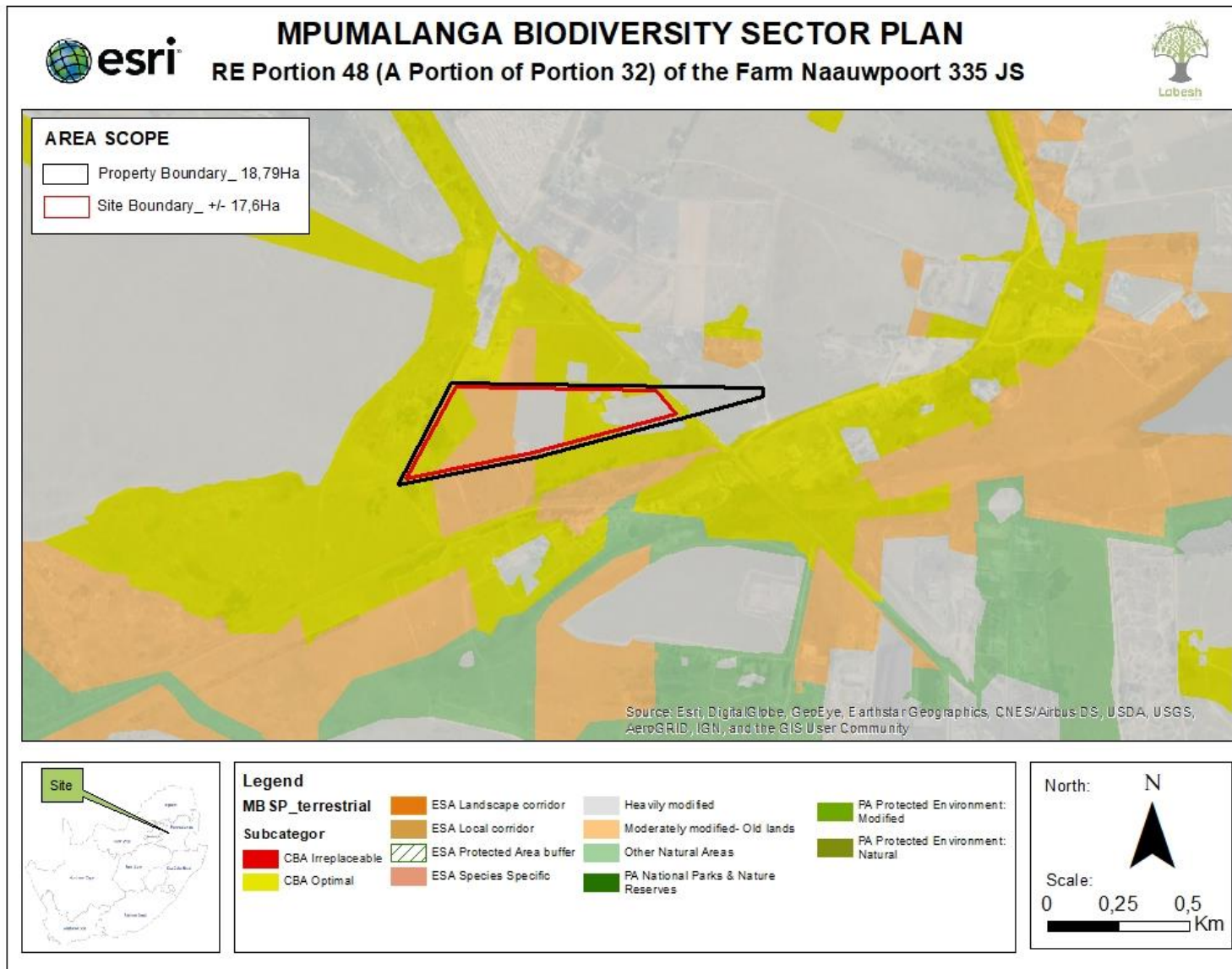


Figure 8: Mpumalanga Biodiversity Sector Plan of the Project Site

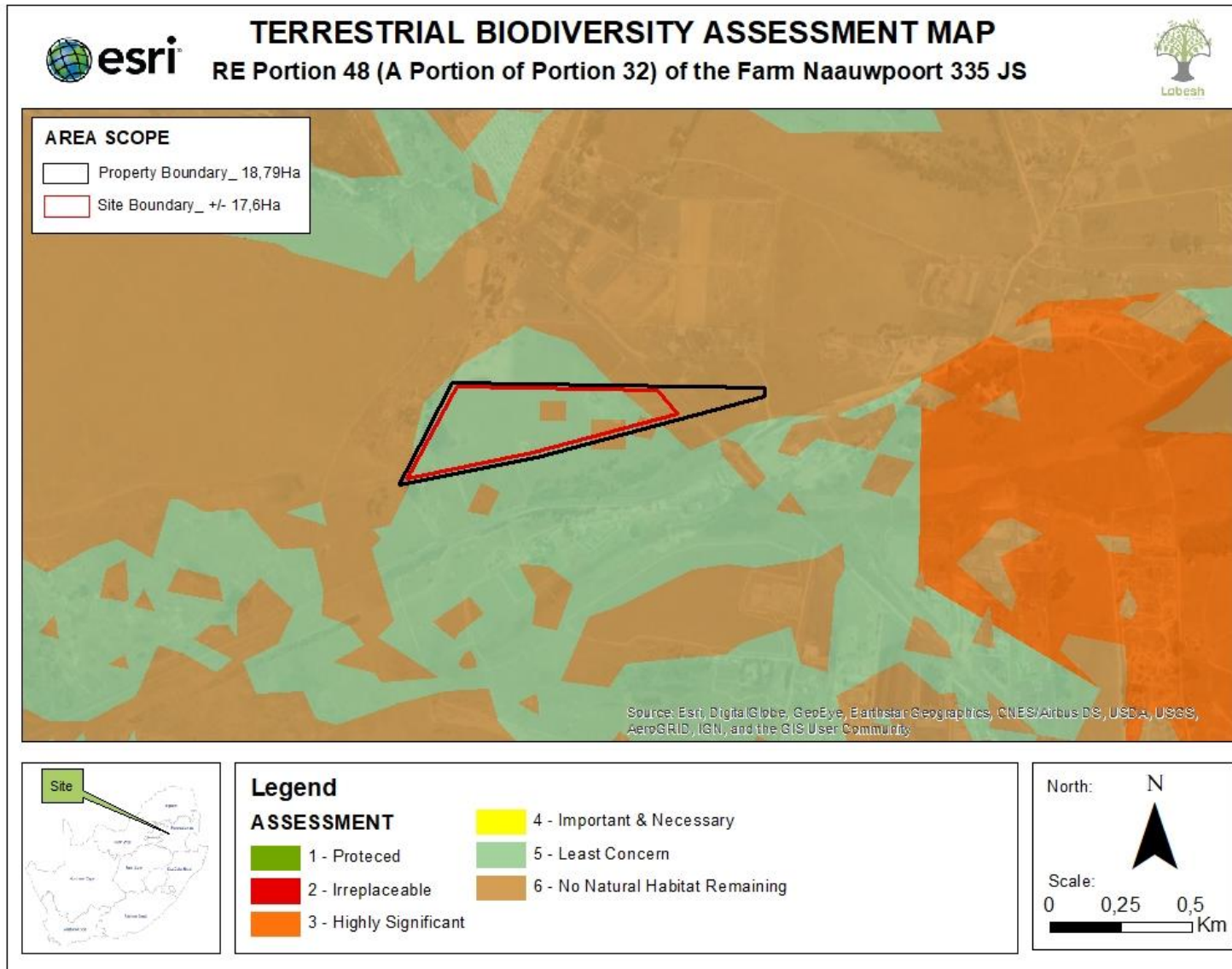


Figure 9: Terrestrial CBA Map of the Project Site

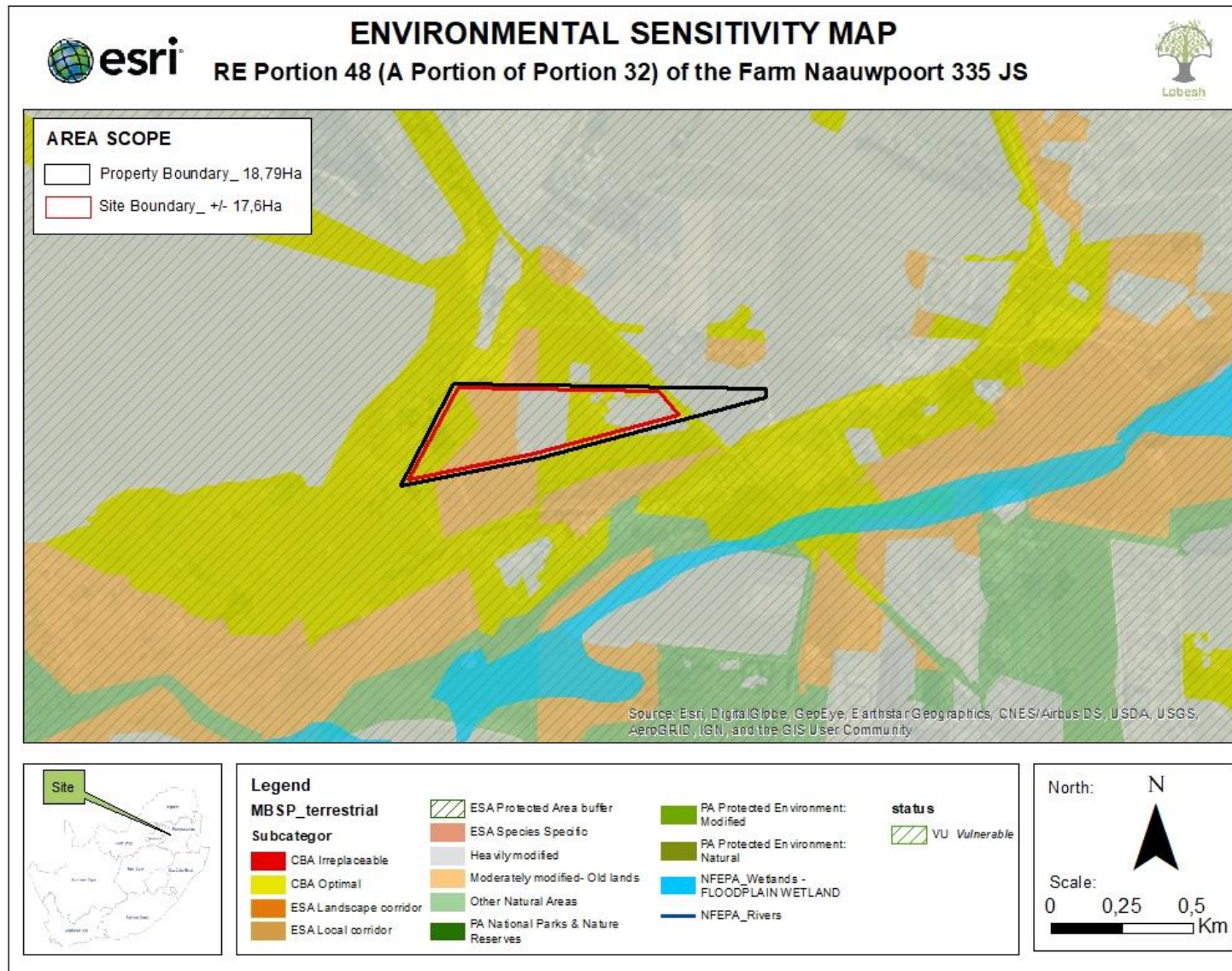


Figure 10: Sensitivity Map of the Project Site

### 8.1.2 Activity

The proposed project will entail a mixed use development comprising of light industrial facilities and a cemetery (private memorial park). The proposed project site is located within the already established Naauwpoort Industrial Area and is surrounded by commercial and industrial related services. No activity alternatives were therefore considered for the proposed development.

### 8.1.3 Design/Layout

The main objective of the layout design was to create an industrial park with a private cemetery that is secure, accessible and convenient for its users. A simple and cost-effective layout with one main road to link all erven were designed. The road was designed with a loop in order to maximize the number of erven on the proposed site and to allow easy mobility within the township. The proposed layout plan makes provision for:

- 8x Industrial Erven;
- 1x Private Road;
- 1x Private Park with Annexure for a Cemetery;
- 1x Refuse Area;
- 1x Special for Water Reclamation Plant; and
- Public Road.

### 8.1.4 Scale and Magnitude

As outlined in the Emalahleni SDF (2015), it is found that there is a shortage of small, serviced industrial erven in Emalahleni. As a result, scale and magnitude were considered in order to maximise the proposed sites' potential for a mixed use development and does the proposed development make provision for the establishment of eight (8) small, serviced industrial erven and one (1) cemetery (private memorial park). The Site Layout Plan was developed by keeping in mind all economic, social and environmental sustainability factors.

### 8.1.5 “No-Go Option”

The No-Go Option would be where the proposed site is not used for the establishment of a mixed use development comprising of light industrial facilities and a cemetery. The No-Go Option is not considered to be a reasonable alternative as this would mean that the undeveloped project site is under-utilised in terms of its potential for a mixed use development for light industrial use (as per the IDP for the local municipality), and for the development of a cemetery which according to the Emalahleni Local Municipality is a high priority (See: page 26; 7.1.1 The Applicant).

The negative environmental impacts expected by the proposed development can be mitigated to acceptable limits. The positive social impacts outweigh the negative impacts and the consideration of the “no-go” option can be justifiably dismissed as a sustainable alternative.

## 8.2 Public Participation Process undertaken in terms of Section 41 of the EIA Regulations, 2014

The following PPP was conducted for the proposed project:

- Identification of key Interested and Affected Parties (all adjacent landowners);
- Identification of key Stakeholders;
- Informing the key Stakeholders of the process by means of correspondence;
- Placement of a press notice in a local and/or provincial newspaper, informing the public of the process;
- Placement of site notices at the site; and

- Correspondence with I&APs and Stakeholders and the addressing of their comments

**The following section of the report will be updated as the Public Participation Process progresses.**

### 8.2.1 Identification and Registration of Interested and Affected Parties and Key Stakeholders

The table below lists adjacent landowners that were identified and notified (by means of hand delivery and/or email) of the proposed project.

List of Adjacent Properties identified (adjacent properties will automatically be registered as I&APs):

Farm Name
Portion 439 (A Portion of Portion 49) of the Farm Naauwpoort 335 JS;
Portion 50 of the Farm Naauwpoort 335 JS
The Farm Klippoort 334 JS

All organs of state that may have jurisdiction in respect of the proposed project and which were identified and notified (via email) were:

- Mpumalanga Department of Community Safety, Security and Liaison
- Mpumalanga Department of Public Works, Roads and Transport
- Nkangala District Municipality
- Emalahleni Local Municipality
- Department of Water and Sanitation
- Mpumalanga Department of Agriculture, Rural Development and Land Administration
- Mpumalanga Department of Co-operative Governance and Traditional Affairs
- Mpumalanga Department of Health
- Mpumalanga Department of Social Development
- Mpumalanga Department of Human Settlements
- Mpumalanga Department of Culture, Sport and Recreation
- Mpumalanga Department of Finance
- Department of Mineral Resources
- South African Heritage Resource Agency

All organs of state that may have jurisdiction in respect of the proposed project are considered to be I&AP's.

**The Interested and Affected Party Register is attached under Appendix C of this report.**

For the initial Public Participation Process (notification of potentially Interested and Affected Parties), written notifications and Background Information Documents were distributed to the above mentioned list of identified Interested and Affected Parties. The notifications were sent via email, fax, registered post or hand delivered. Site notices were placed on the boundary of the project property. A newspaper advertisement was placed in the Witbank News Newspaper, on the 26 November 2021.

Proof of the above mentioned initial Public Participation Process is attached under Appendix C.



## 8.2.2 Summary of the issues raised by the Interested and Affected Parties and how the issues were addressed or incorporated into the Environmental Impact Assessment process

Entity represented	Name and Surname	Date upon which comment was received	Comment submitted via	Comment(s) raised	Response to comment(s) raised
Anglo Operations (Pty) Ltd- Thungela	Leonore van Wyk	14 December 2021	Email	<p>Anglo Operations (Pty) Ltd (“AOPL”) is the holder of the Khwezela Kleinkopje (“Bokgoni”) mining right with Department of Mineral Resources and Energy (“DMRE”) reference number MP 30/5/1/2/2/307 MR over a portion of portion RE/48/32 of the Farm Naauwpoort 335 JS, and therefore the application overlaps with our long existing mining right. See Annexure 2 for the overlapping map.</p> <p>In accordance to paragraph 2, AOPL hereby formally register as an Interested and Affected Party (“I&amp;AP”) and further requests Cuberman (Pty) Ltd (“Cuberman”) to refrain from the EA application submission as a portion of the application area overlaps with AOPL’s existing mining right.</p>	<p>We hereby acknowledge receipt of your email, your registration as Interested and Affected Party (I&amp;AP) and your comments for the following proposed project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS; EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority, submitted to us via email on 14 December 2021.</p> <p>We furthermore confirm that you have been added to the Interested and Affected Party Register for this project and that you will be notified of all future public participation opportunities, including the public review of the Draft Basic Assessment Report and draft Environmental Management Programme for this project. Your comments will be addressed and included in the reports</p>

Entity represented	Name and Surname	Date upon which comment was received	Comment submitted via	Comment(s) raised	Response to comment(s) raised
					that will in due course be finalised and provided to you for review and commenting.

## 8.3 Environmental attributes associated with the alternatives considered – Environmental attributes of the proposed, project properties (the preferred alternative)

### 8.3.1 Geographical

#### Geology and Soil

According to the Geology Map, the site consists of:

- Shale and sandstone of the Ecca Group, Karoo Sequence; and
- Shale, sandstone, clay, conglomerate, limestone and marl (Ecca Group); dolerite, lava, sandstone, conglomerate, siltstone and rhyolite (Loskop Formation).

According to the Geological Investigation done by SCIP Engineering Group in 2021, the proposed site is suitable for the installation of civil services, including the proposed use for a cemetery. The material has collapsible potential in certain areas and would essential detail be required when designing roadworks layers. Special attention must be given to ground covering (whether natural or constructed paving) as the soil on the proposed site is prone to erosion. Problems with excavatability are expected at 2,5m for some areas of the proposed project site. Investigated test pits showed no presence of water, but areas underlain by sandstone may contain shallow water tables during the rainfall season. From a geotechnical perspective it was concluded that the proposed site is suitable for the intended purposes.

### 8.3.2 Physical

#### Rainfall

With the proposed project site located approximately 15km south of Emalahleni, rainfall data for Emalahleni was used as part of the study. Emalahleni receives most of its rain during summer months with its highest rainfall in the month of February at approximately 261mm (that was measured over a period of 19 days). Lowest rainfall is experienced during the months of May and July with 0% rainfall (worldweatheronline.com, n.d.).

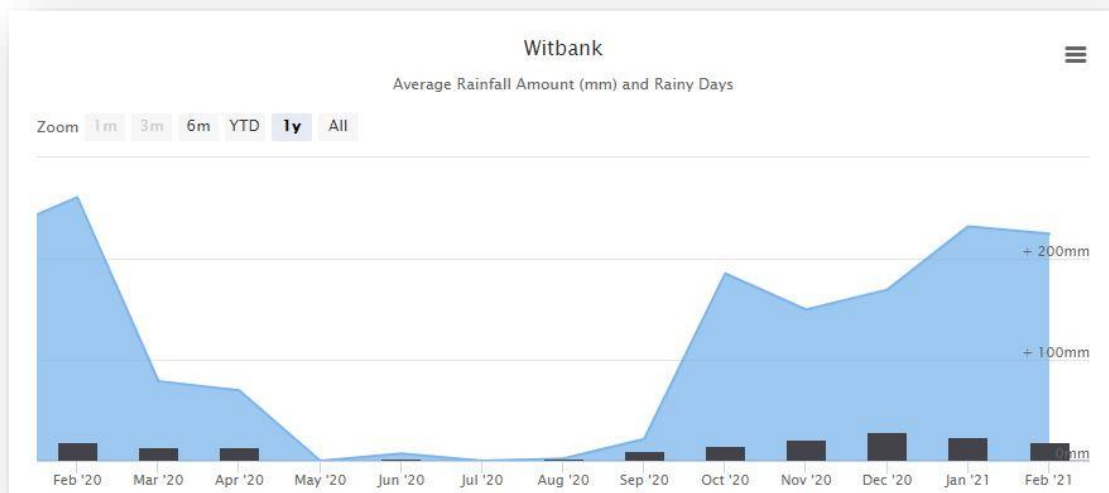


Figure 11: Rainfall Pattern for Emalahleni

## Temperature

With the proposed project site located approximately 15km south of Emalahleni, temperatures for Emalahleni was used as part of the study. Highest temperatures are experienced between the months of November and December with a max temperature of 28°C and a minimum temperature of 18°C. Lowest temperatures are experienced in the month of June with a maximum temperature of 18°C and a minimum temperature of 7°C.



Figure 12: Temperatures for Emalahleni

## Wind Direction

Statistics based on observations taken between 12/2011 and 06/2021 shows that the predominant wind direction for the Emalahleni weather station is in the Northern direction (windfinder.com, n.d.).

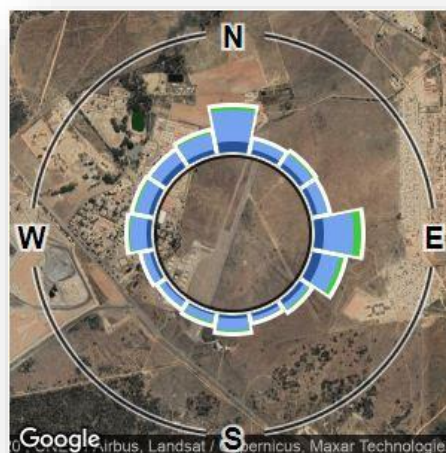


Figure 13: Prevailing wind direction for Emalahleni

## Wind Speed

Emalahleni experienced its lowest wind speeds between the months of April and June 2021, with April measured at an average wind speed of 9,8kmph and June at 9,8kmph. Higher wind speeds were experienced between September and November 2020, with September measured at an average wind speed of 14,9 kmph and November at 15,8kmph. The lowest wind speed was recorded in June 2020 at 9,2kmph and the highest wind speed was recorded in October 2020 at 16,1kmph (wordlweatheronline.com, n.d.).

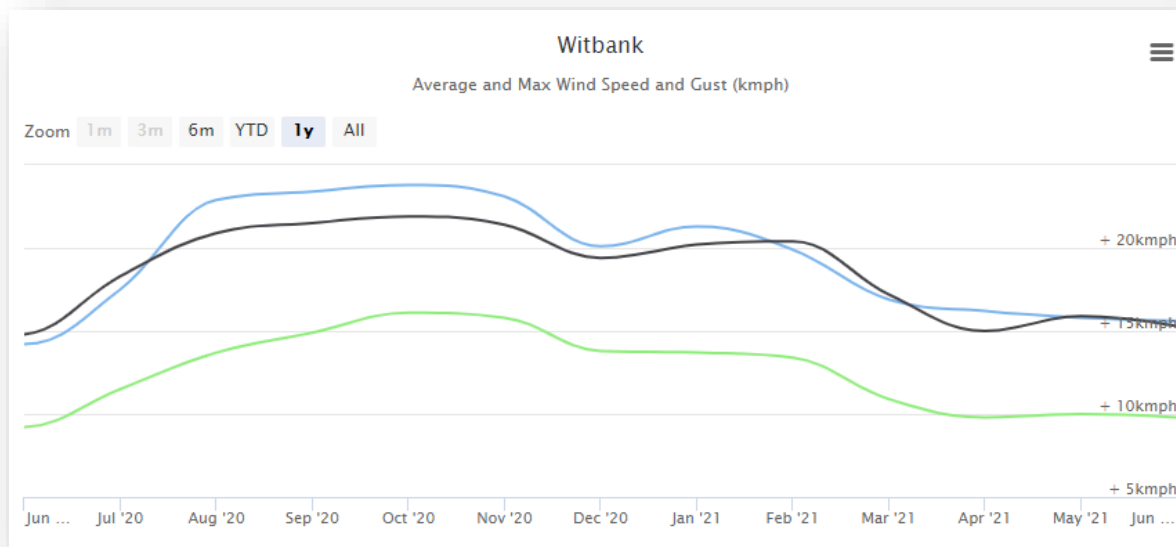


Figure 14: Wind Speed for Emalahleni (June 2020-June 2021)

## Topography

Emalahleni is located within the Mpumalanga Province and has a coverage area of 2 678km<sup>2</sup> (Wikipedia.org). Landscape features include slightly to moderately undulating plains, including some low hills and pan depressions. Altitude range from 1520 to 1780m, but can also range as low as 1300m (Mucina & Rutherford, 2006). According to the Elevation Map, the proposed site consists of elevations between 1565 and 1540 masl (metres above sea level).

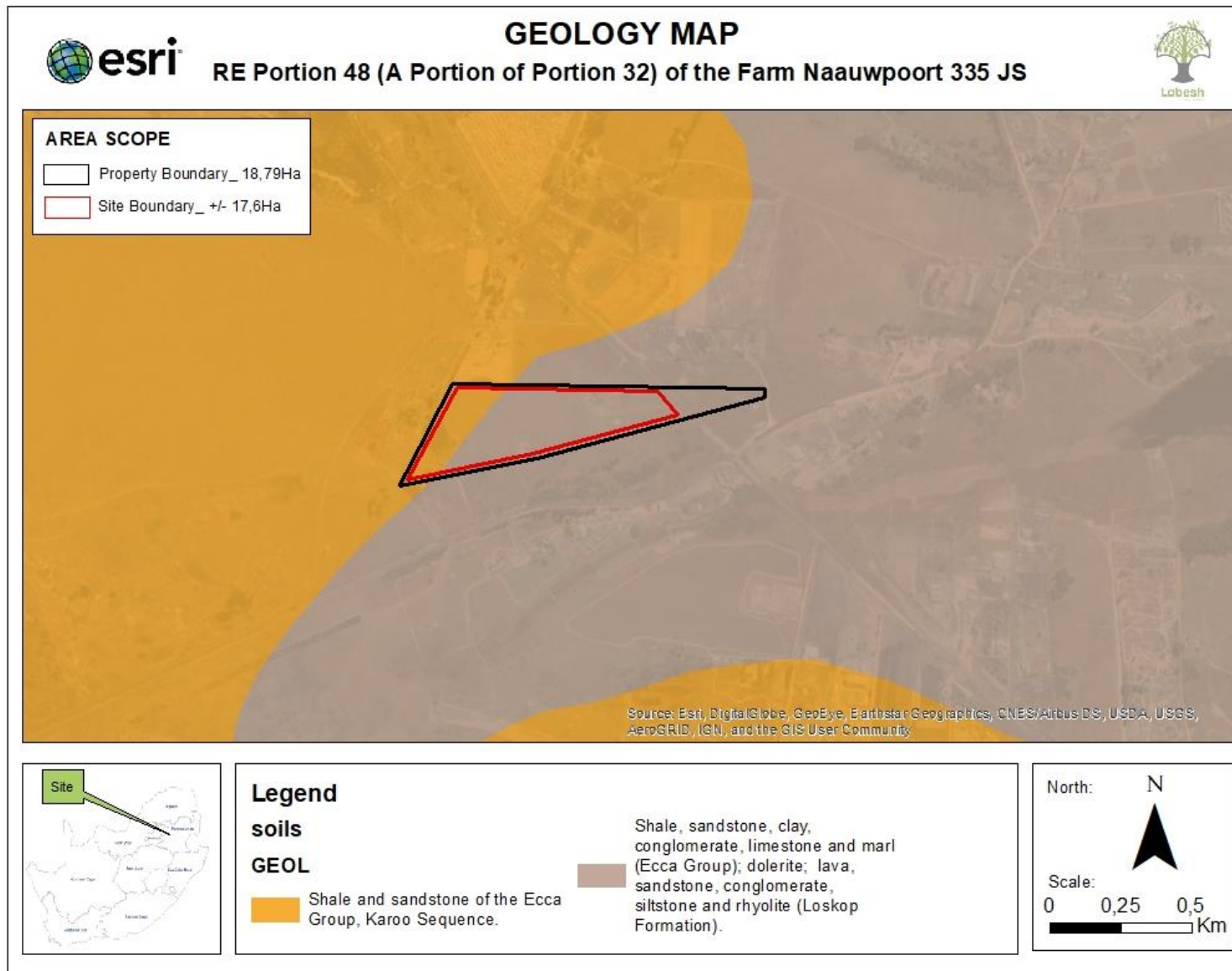


Figure 15: Geology Map of the Project Site

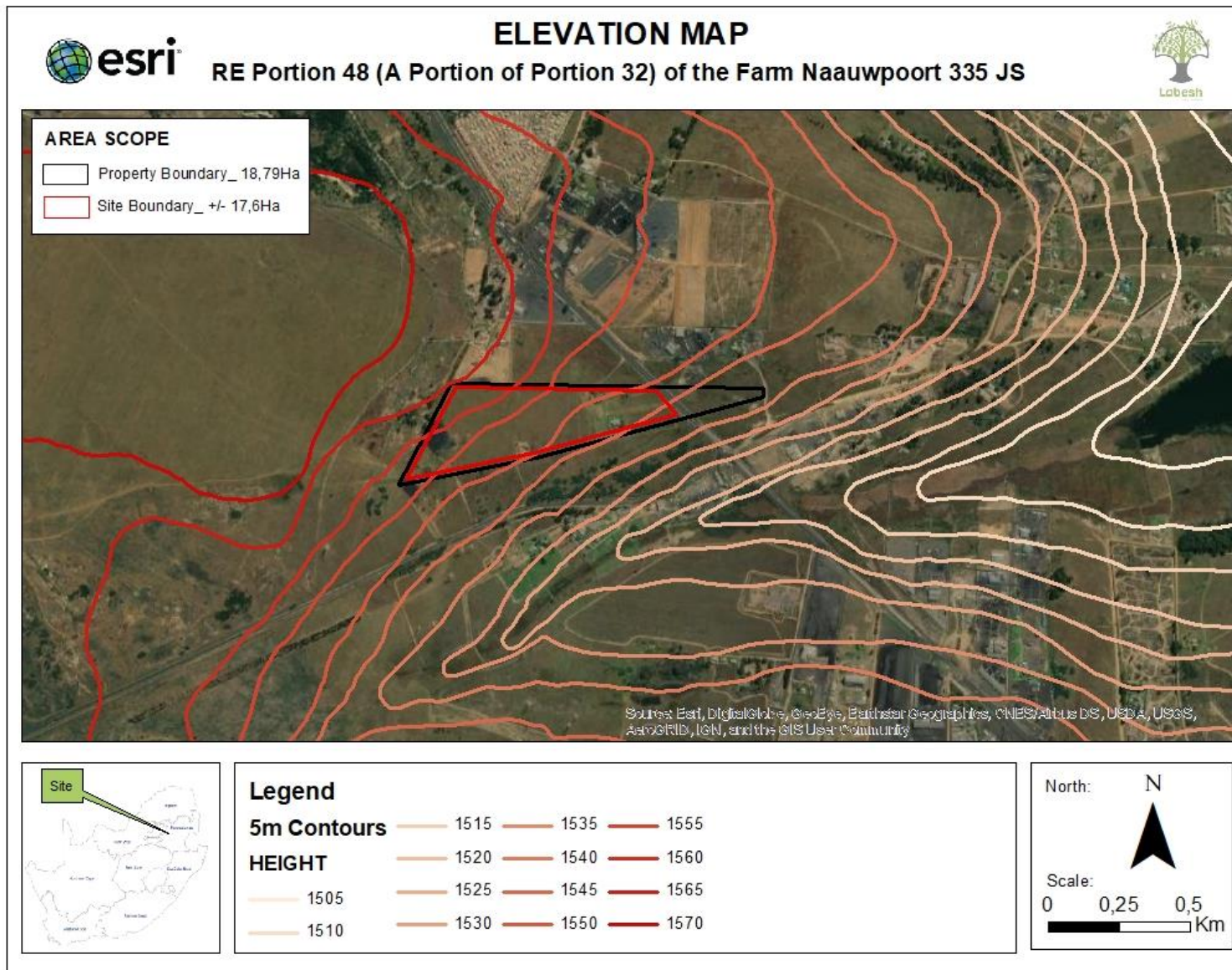


Figure 16: Elevation Map of the project site

## Biological Flora

As the project site is heavily modified, a desktop assessment is provided in this section as a reflection of the historical state of the environment. The project site lies within the Grassland biome, and more specifically within the Eastern Highveld Grassland (Gm 12). The Eastern Highveld Grassland is considered to be 'Endangered'.



Figure 17: Grassland Biome of South Africa

Grasslands are characterised by open vegetation cover made up of a continuous grass layer and occurs throughout the African continent. Grasslands in South Africa supports multiple fauna and flora communities. For example, upland grasslands can contain as much as 82 plant species within a 1000m<sup>2</sup>, making grasslands the second most diverse biome in South Africa. Forbs, herbaceous plant species are one of the notable grassland plant growth and can persist in the landscape for long periods without the need to reproduce. However, fire is a natural disturbance that plays an important role within the grassland biome. Forbs, herbaceous plant species require fire to reproduce as they are able to resprout after fire with their woody or tuberous root systems (Zaloumis, 2013).

Most grasslands have very little tree growth and where trees do exist in the grassland biome, these are usually thick-skinned, deeply rooted and unappealing to animals. Grasslands receive very low precipitation rates with an average of 500 to 900 millimetres of rain per year (WorldAtlas, n.d.). Two types of grass plants occur within the grassland biome: sweet grasses and sour grasses. Sweet grass species usually have a low fibre content and preserve their nutrients in their leaves during winter months, while sour grass species usually have a high fibre content and withdraw their nutrients from their leaves during winter months (pza.sanbi.org). Common fauna species present within the grassland biome is *Aristida*, *Digitaria*, *Eragrostis*, *Themeda*, *Heteropogon*, *Tristachya* and *Elionurus* species. Some wood species within the biome is *Acacia caffra*, *Celtis africana*, *Diospyros lycioides* subsp. *lycioides* (Mucina & Rutherford, 2006).

Although the second most diverse biome in South Africa, grasslands are very vulnerable to climate change. Climate change affects minimum and maximum temperatures in many areas with the end result that grasslands either experience harsher hot/dry seasons or harsher cold winters (WorldAtlas, n.d.)

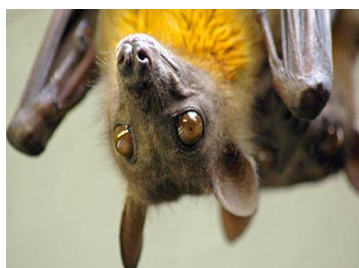
According to the Environmental Screening Report (2021), attached under Appendix E, the site has a "medium sensitivity" in terms of the Plant Species Theme and a "very high sensitivity" in terms of the Terrestrial Biodiversity Theme.

In conclusion, it is not expected that any remnants of the original Eastern Highveld grassland vegetation would be present onsite, as the project site has historically been modified/disturbed.



## Fauna

Grasslands all around the world has experienced severe habitat destruction as a result of anthropogenic changes. The Highveld itself is home to a number of endangered animals such as the straw-coloured fruit bats, the African rock python, mountain zebras and South Africa's national bird, the blue crane. The only endemic bird species to live in the Highveld grassland is Botha's lark. Other reptiles found in the Highveld includes the Nile crocodile, Nile monitor, rock monitor and the giant girdled lizard or sungrazer (Wikipedia.org, n.d.).



Straw-coloured Fruit Bat



Mountain Zebra



Blue Crane



Botha's Lark



Nile Crocodile



Nile Monitor

Figure 18: Fauna of the Highveld Grassland of South Africa

Most of the grasslands still remaining in natural state is found in various nature reserves. This protected areas include the Suikerbosrand Nature Reserve, Verloren Valei Nature Reserve, Nooitgedacht Dam Nature Reserve, Bronkhorstspuit Dam Nature Reserve, Vaal Dam Nature Reserve, Koppies Dam Nature Reserves and Willem Pretorius Game Reserve (Wikipedia.org, n.d.).

According to the Environmental Screening Report (2021), attached under Appendix E, the site has a "*medium sensitivity*" in terms of the Animal Species Theme.

As the project site has historically been modified/disturbed, it is not expected that any threatened or protected fauna species would be present onsite.

## Wetlands, watercourses and groundwater

Wetlands that could be classified as floodplain wetlands, channelled valley-bottom wetlands, unchannelled valley-bottom wetlands, depressions, seeps or wetland flats are absent at the project site. Aquatic systems that connects with any river is also absent at the project site. A visually disturbed and modified non-perennial river (with active channel, riparian zone and small in-channel dams) with impoundments caused by road elevations are present south and south-east of the project site. The non-perennial river located outside of the project site is a tributary of the Witbank Dam waterbody. The outer edge of the riparian zone of the tributary is approximately 150m from the site (at its closest). A tar road and industrial and residential areas are found to be present between the tributary and the project site (Terblanche, 2021).

The present ecological status (PES) of the non-perennial river located outside of the project site is a *Category C* which means that the specific watercourse is already moderately modified, with some loss of natural habitats. Ecological

importance and sensitivity (EIS) of the watercourse located outside the project site is classified as a *Category C* which is moderate and considers the watercourse as ecologically important and sensitive on provincial or local scale. The project site is also part of the Olifants Water Management Area (WMA 4) and is not part of a Freshwater Ecosystem Priority Area (FEPA) (Terblanche, 2021). Additionally, the Environmental Screening Report (2021), attached under Appendix E, shows a "*low sensitivity*" on the Aquatic Biodiversity Theme Sensitivity and according to the Hydrology Map there is also no wetland present on the proposed project site.

To summarise: The non-perennial river, in-channel dams (with their riparian zones and buffer zones) are located well outside the project site and is unlikely to be significantly impacted by the proposed development.

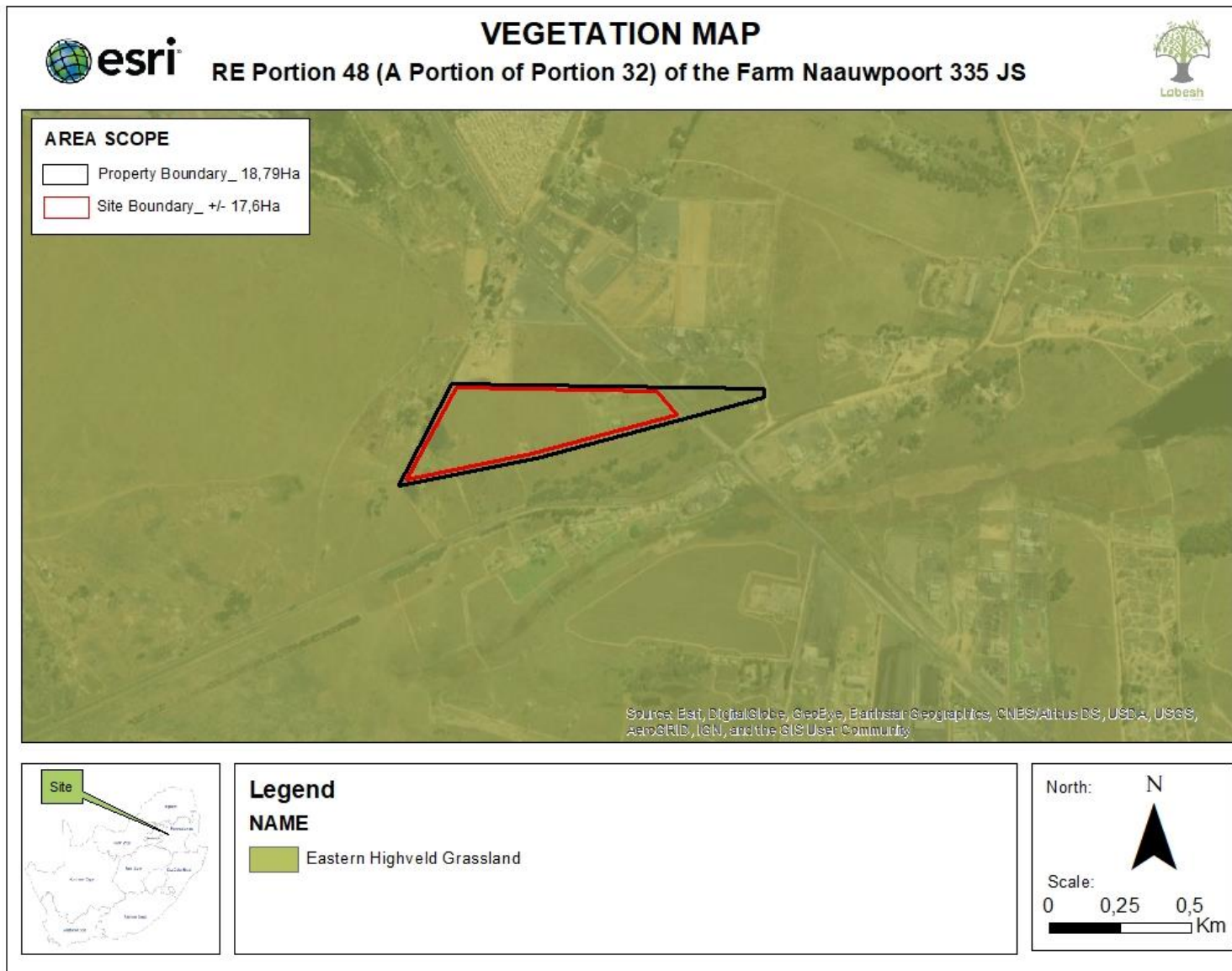


Figure 19: Vegetation Map of the Project Site

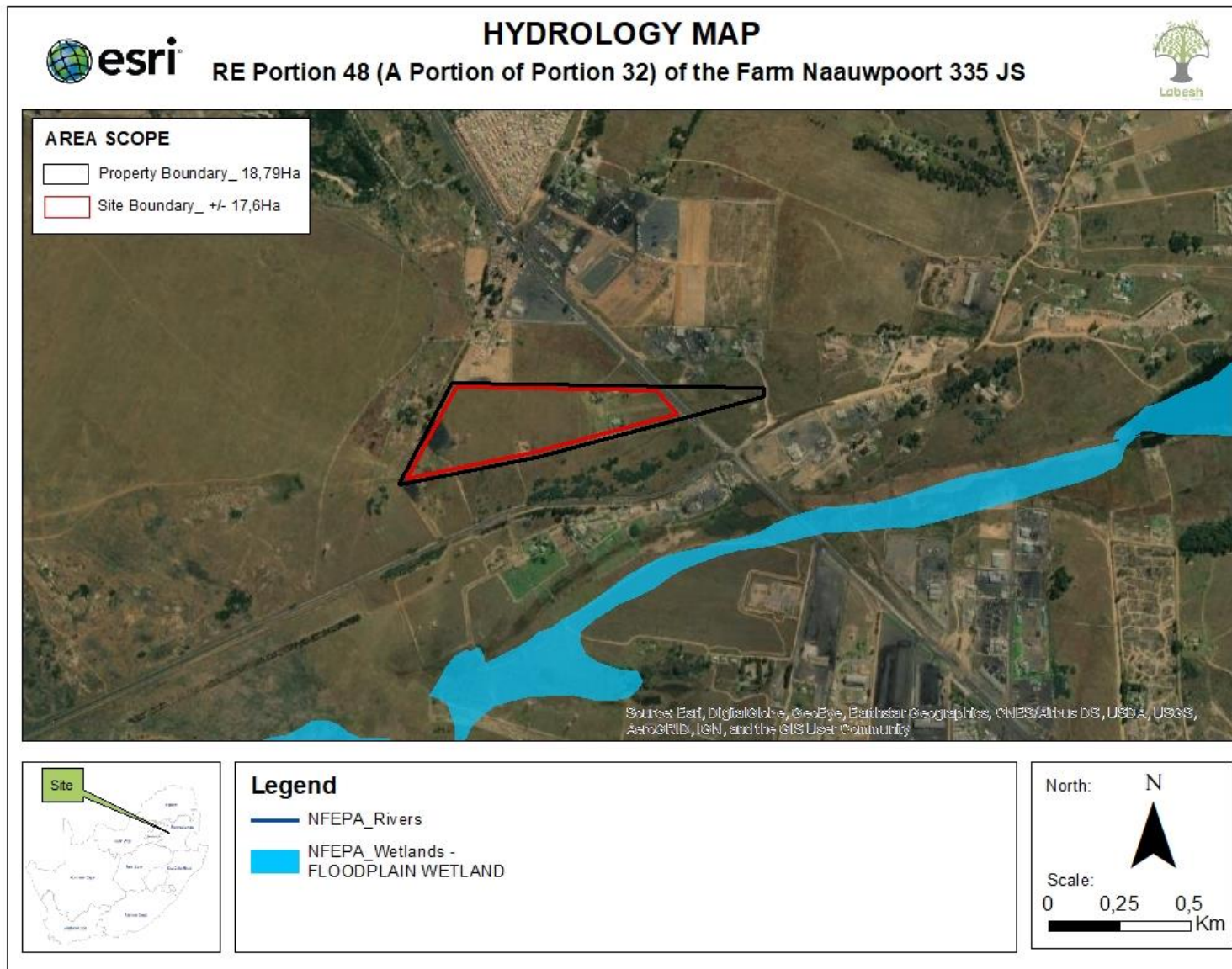


Figure 20: Hydrology Map of the Project Site and Surrounding Area

### 8.3.3 Social

Emalahleni Social Statistics (Emalahleni IDP 2021/22) / (Emalahleni IDP 2018/19)			
Population Number	2016		Growth from 2011
	455 228		3,02%
Estimated Population by 2030	707 530		
Male to Female Ratio	2016		
	Males		Females
	52,9%		47,1%
Grade 12 Pass Rate	2013	2016	2017
	83,2%	88%	80,9%

The proposed project site is located within the Emalahleni Local Municipality in the Nkangala District Municipality, Mpumalanga Province. Within the Nkangala District, Emalahleni contributed to 31,5% of the total population in the year 2016. Emalahleni was the third largest population within the entire Mpumalanga Province. According to the 2016 statistics, Emalahleni had a population of approximately 455 228, with overall population growth of 3,02% from 2011 to 2016. It was also estimated that Emalahleni's population will measure at around 707 530 individuals in the year 2030 (Emalahleni IDP, 2021/22). As a result of the estimated population growth by the year 2030, extreme pressure is placed on infrastructure development, service delivery and ultimately job creation.

Emalahleni Local Municipality's male to female ratio measured at 93,6 males per 100 females in the year 2016 (Emalahleni Local Municipality Socio Economic Review and Outlook, 2017). As a result Emalahleni consisted of a fairly stable population with a male to female ratio of 52,9% males to 47,1% females (Emalahleni IDP 2021/22).

Emalahleni Local Municipality's Grade 12 pass rate has seen improvement from 2013 to 2016 with the pass rate in 2013 measured at 83,2% and in 2016 at 88%. There was however a slight decrease in the pass rates in 2017 with a pass rate measured at 80,9% (Emalahleni IDP, 2018/19).

### 8.3.4 Economic

Emalahleni is one of the municipalities that is experiencing a population growth rate which is higher than its economic growth rate. This has a negative impact in terms of the GDP per capita and on infrastructure, service delivery and job creation.

Emalahleni Local Municipality contributes to 45,9% of the economy of the Nkangala District Municipality and is the biggest contributor in the Nkangala District and second largest contributor in the Mpumalanga Province (Mbombela is the largest contributor in the Mpumalanga Province). The size of the Emalahleni economy contributed to R66 billion in the year 2018 and contributed to 18% of the Provincial GDP in the same year (Emalahleni IDP, 2021/22).

<b>Emalahleni Strongest Economic Sector (2017)</b> (Emalahleni IDP, 2021/22)	
Mining	54,7%
Trade	9,1%
Community Services	8,9%
Finance	7,9%
Manufacturing	7,8%
Utilities	4,7%
Transport	4,1%
Construction	2,2%
Agriculture	0,6%

There are two other emerging sectors in Emalahleni with significant potential and include fourth industrial revolution (the digital economy) and green economy (Emalahleni IDP 2021/22).

### 8.3.5 Unemployment and Employment

Emalahleni contributes to 15,1% of employment within the Mpumalanga Province. In between 2015 and 2018 there was approximately 2500 employment opportunities that were created per annum over the three year period (Emalahleni IDP 2021/22).

A recent SERO Report for the Emalahleni Local Municipality showed an unemployment rate of 28,2% which is 1% below the national unemployment rate of 29%. The overall unemployment rate decreased from 27,3% in 2011 to 25,3% in 2015 but increased to 26,6% in 2016. In 2018, the unemployment rate for females were at 34,8% and males at 23,9%. Youth unemployment rate measured at 36% with an especially highly unemployment rate under the female youths. Unemployment of females are assumed to be the result of low level educational background and inadequate skill levels (Emalahleni IDP 2021/22).

It is extremely important for the investment climate of the local municipality to improve and be more conducive in order to accommodate new job seekers. Projects that entails a high labour absorption and intensity will play a significant role in addressing unemployment (Emalahleni IDP 2021/22).

### 8.3.6 Archaeological and Cultural Heritage

It is not expected for the proposed development to have an impact on archaeological or cultural heritage of the area. The proposed development entails the removal of approximately 17,6ha of indigenous vegetation. The project property is approximately 17 ha (170 798m<sup>2</sup>) in total.

According to the National Heritage Resources Act, 1999 (Act No. 25 of 1999), developments that will change the character of a site by more than 5 000m<sup>2</sup> must be brought under the attention of the South African Heritage Resources Agency (SAHRA). Such developments may then require a Heritage Impact Assessment to be conducted (as required by SAHRA). The part of the project property (the site) that will be changed as part of the proposed development is more than 5 000m<sup>2</sup> and a Phase 1 Heritage Impact Assessment may be required for the project site. SAHRA has, however, been notified of the proposed development as part of the general public participation process, seeing as SAHRA is considered to be an Interested and Affected Party of the proposed project, irrespective of the fact that a Heritage Impact Assessment is not required.

The Environmental Screening Report (2021), attached under Appendix E, shows a "low sensitivity" on the Archaeological and Cultural Heritage Theme Sensitivity.

### 8.3.7 Palaeontological

The Environmental Screening Report (2021), attached under Appendix E, shows a "*very high sensitivity*" on the Palaeontology Theme Sensitivity. According to the South African Heritage Resources Agency's Palaeontological (Fossil) Sensitivity Map, the site has a '*Very High*' as well as '*Moderate*' sensitivity and a field assessment and Protocol of Fossil Finds is required (<https://sahris.sahra.org.za/map/palaeo>).

## 8.4 Impacts and risks identified for each alternative

The following impacts and risks have been identified for the preferred alternative:

Table 4: Impacts and Risks Identified for the Preferred Alternative

Impact	Phase	Risks
Pre-construction Phase	Pre-construction phase	<ul style="list-style-type: none"> <li>• Unauthorised access to the construction site that can pose a risk to the public in terms of their safety.</li> <li>• Unsafe working conditions.</li> <li>• Workers being unaware of the dangers of working at the construction site, resulting in a risk to their safety.</li> </ul>
	Planning and Design Phase	<ul style="list-style-type: none"> <li>• Inadequate planning or faulty designs may lead to surface and groundwater pollution.</li> </ul>
Surface and Groundwater	Construction Phase	<ul style="list-style-type: none"> <li>• Pollution of surface and/or groundwater resources due to hydrocarbon spillages or leakages from construction vehicles.</li> <li>• Pollution of surface and/or groundwater resources due to spillages from chemical toilets.</li> <li>• Pollution of surface and/or groundwater resources due to the incorrect management, storage and disposal of construction waste.</li> <li>• Pollution of surface and/or groundwater resources due to the runoff of contaminated stormwater.</li> <li>• Pollution of surface and/or groundwater resources from the mixing of concrete.</li> <li>• The wastage of water resources due to the irresponsible use of water.</li> </ul>
	Operational Phase	<ul style="list-style-type: none"> <li>• Pollution of surface and/or groundwater resources due to hydrocarbon spillages or leakages from vehicles.</li> <li>• Pollution of surface and/or groundwater resources due to the incorrect management, storage and disposal of waste.</li> <li>• Pollution of surface and/or groundwater resources due to the runoff of contaminated stormwater.</li> <li>• Pollution of surface and/or groundwater resources due to leakages from the sewerage network (pipelines) onsite.</li> <li>• Pollution of surface and/or groundwater resources due to operation of the cemetery.</li> <li>• The wastage of resources due to the irresponsible use of water and electricity.</li> </ul>
	Post-construction and Rehabilitation Phase	<ul style="list-style-type: none"> <li>• Pollution of surface and/or groundwater resources due to hydrocarbon spillages or leakages from construction vehicles.</li> </ul>
	Decommissioning Phase	No decommissioning activities are anticipated or planned for the proposed project. Therefore, no impacts have been identified or assessed as part of this Environmental Impact Assessment process.



Impact	Phase	Risks
Fauna	Construction Phase	<ul style="list-style-type: none"> <li>Loss of habitat.</li> <li>Habitat fragmentation.</li> <li>Disturbance of any fauna species that may be resident onsite.</li> </ul>
	Operational Phase	<ul style="list-style-type: none"> <li>Disturbance of any fauna species that may be resident onsite.</li> <li>Habitat fragmentation.</li> <li>Provision of artificial habitat for fauna species.</li> </ul>
	Post-construction and Rehabilitation Phase	<ul style="list-style-type: none"> <li>Disturbance of any fauna species that may be present onsite.</li> </ul>
	Decommissioning Phase	No decommissioning activities are anticipated or planned for the proposed project. Therefore, no impacts have been identified or assessed as part of this Environmental Impact Assessment process.
Flora	Construction Phase	<ul style="list-style-type: none"> <li>Loss of degraded/disturbed vegetation (Eastern Highveld grassland) during site clearance.</li> <li>Establishment and spread of alien invasive vegetation.</li> <li>Risk of veld fires.</li> </ul>
	Operational Phase	<ul style="list-style-type: none"> <li>Establishment and spread of alien invasive vegetation (onsite and surrounding areas).</li> <li>Risk of veld fires.</li> </ul>
	Post-construction and rehabilitation phase	<ul style="list-style-type: none"> <li>Establishment and spread of alien invasive vegetation (onsite and further than the site).</li> </ul>
	Decommissioning Phase	No decommissioning activities are anticipated or planned for the proposed project. Therefore, no impacts have been identified or assessed as part of this Environmental Impact Assessment process.
Heritage Resources	Construction Phase	<ul style="list-style-type: none"> <li>The site is located in an area with "Low" archaeological and cultural heritage sensitivity. The possibility exists that significant fossil assemblages may be present beneath the site. Possible disturbance or destruction of cultural and heritage resources.</li> </ul>
	Operational Phase	
	Post-construction and Rehabilitation Phase	
	Decommissioning Phase	No decommissioning activities are anticipated or planned for the proposed project. Therefore, no impacts have been identified or assessed as part of this Environmental Impact Assessment process.
Palaeontological Resources	Construction Phase	<ul style="list-style-type: none"> <li>The site is located in an area with "Very High" palaeontological sensitivity. The possibility exists that significant fossil assemblages</li> </ul>
	Operational Phase	

Impact	Phase	Risks
	Post-construction and Rehabilitation Phase	may be present beneath the site. The disturbance and/or destruction of the fossil assemblages.
	Decommissioning Phase	No decommissioning activities are anticipated or planned for the proposed project. Therefore, no impacts have been identified or assessed as part of this Environmental Impact Assessment process.
<b>Air Quality and Noise</b>	Construction Phase	<ul style="list-style-type: none"> <li>• Generation of dust by construction vehicles.</li> <li>• Release of emissions from construction vehicles.</li> <li>• Generation of nuisance and noise from construction vehicles and equipment/machinery.</li> </ul>
	Operational Phase	<ul style="list-style-type: none"> <li>• Generation of dust by excavation and vehicles onsite.</li> <li>• Release of emissions from vehicles.</li> <li>• Generation of nuisance and noise from vehicles, excavation and maintenance activities.</li> </ul>
	Post-construction and Rehabilitation Phase	<ul style="list-style-type: none"> <li>• Generation of dust by construction vehicles.</li> <li>• Release of emissions from construction vehicles.</li> <li>• Generation of nuisance and noise from construction vehicles and equipment/machinery.</li> </ul>
	Decommissioning Phase	No decommissioning activities are anticipated or planned for the proposed project. Therefore, no impacts have been identified or assessed as part of this Environmental Impact Assessment process.
<b>Soil</b>	Planning and Design Phase	<ul style="list-style-type: none"> <li>• Inadequate planning or faulty designs may lead to soil pollution and may cause soil instability and disturbances.</li> </ul>
	Construction Phase	<ul style="list-style-type: none"> <li>• Soil pollution due to hydrocarbon spillages or leakages from construction vehicles.</li> <li>• Soil pollution due to spillages from chemical toilets.</li> <li>• Soil pollution due to the incorrect management, storage and disposal of waste (general and hazardous waste).</li> <li>• Soil pollution of surface and/or groundwater resources from the mixing of concrete.</li> <li>• Soil erosion due to the clearance of vegetation and the removal of topsoil and subsoil.</li> <li>• Soil compaction to create foundations for buildings and other associated infrastructure.</li> <li>• Degradation of topsoil due to incorrect storage practices.</li> </ul>
	Operational Phase	<ul style="list-style-type: none"> <li>• Soil pollution due to hydrocarbon spillages or leakages from vehicles.</li> <li>• Soil pollution due to the incorrect management, storage and disposal of waste (general and hazardous waste).</li> <li>• Soil pollution due to leakages from the sewerage network (pipelines) onsite.</li> <li>• Soil instability.</li> </ul>

Impact	Phase	Risks
	Post-construction and Rehabilitation Phase	<ul style="list-style-type: none"> <li>• Soil pollution due to hydrocarbon spillages or leakages from vehicles.</li> <li>• Soil erosion due to inefficient rehabilitation of construction areas.</li> </ul>
	Decommissioning Phase	No decommissioning activities are anticipated or planned for the proposed project. Therefore, no impacts have been identified or assessed as part of this Environmental Impact Assessment process.
Socio-economic	Construction Phase	<ul style="list-style-type: none"> <li>• Generation of a number of employment opportunities.</li> <li>• Potential increase in crime due to the influx of workers.</li> <li>• Stimulation of the local economy.</li> </ul>
	Operational Phase	<ul style="list-style-type: none"> <li>• Generation of a number of employment opportunities.</li> <li>• Stimulation of the local economy.</li> </ul>
	Post-construction and Rehabilitation Phase	<ul style="list-style-type: none"> <li>• Generation of a number of employment opportunities.</li> <li>• Stimulation of the local economy.</li> </ul>
	Decommissioning Phase	No decommissioning activities are anticipated or planned for the proposed project. Therefore, no impacts have been identified or assessed as part of this Environmental Impact Assessment process.
Traffic	Construction Phase	<ul style="list-style-type: none"> <li>• Increase in traffic volumes to the site.</li> </ul>
	Operational Phase	
	Post-construction and Rehabilitation Phase	
	Decommissioning Phase	No decommissioning activities are anticipated or planned for the proposed project. Therefore, no impacts have been identified or assessed as part of this Environmental Impact Assessment process.
Fire Risk	Construction Phase	<ul style="list-style-type: none"> <li>• Increased risk of fire due to construction/operational activities and increased human activity.</li> </ul>
	Operational Phase	
	Post-construction and Rehabilitation Phase	None anticipated
	Decommissioning Phase	No decommissioning activities are anticipated or planned for the proposed project. Therefore, no impacts have been identified or assessed as part of this Environmental Impact Assessment process.

## Cumulative Impacts

*Cumulative Impacts can be defined as the changes experienced within the environment that are caused by an action in combination with past, present and future human actions (environment.gov.za).*

The release of greenhouse gas emissions from vehicles and trucks such as:

- Carbon Dioxide (CO<sub>2</sub>);
- Carbon Monoxide (CO);
- Nitrogen Oxide (NO); and
- Sulphur Dioxide (SO<sub>2</sub>)

The above mentioned gasses will combine with other greenhouse gasses in the atmosphere and contribute towards the global Climate Change effect.

The impacts have been fully assessed under Section 9.3 of this report

## 8.5 Methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives

Please refer to Sections 9.1 and 9.2 of this report.

## 8.6 Positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected

As detailed under Section 8.4 above.

## 8.7 Possible mitigation measures that could be applied and level of residual risk

The following table contains possible mitigation measures that can be applied to mitigate the identified impacts. Detailed mitigation measures have also been included in the Environmental Management Programme (EMPr) that forms part of this Basic Assessment Report.

Table 5: Possible Mitigation Measures

Impact	Possible mitigation measures
<b>Planning and Design Phase</b>	
Inadequate planning and design of facilities that could result in environmental impacts that could have been avoided.	<b>Site selection</b> <ul style="list-style-type: none"> <li>• The new infrastructure should preferably be constructed on an already disturbed site.</li> <li>• The new infrastructure may not be constructed on a wetland or within a drainage line.</li> <li>• The new infrastructure must preferably be constructed on a level/flat site.</li> <li>• The site must have the correct land use zoning to enable the new infrastructure to be constructed and operated.</li> </ul>
Residual risk: None anticipated.	
	<b>Design of facilities</b>

Impact	Possible mitigation measures
	<ul style="list-style-type: none"> <li>Impermeable foundations (such as concrete foundations) must be designed.</li> <li>An adequate number of fire extinguishers must be provided for.</li> </ul>
<b>Pre-construction Phase</b>	
<ul style="list-style-type: none"> <li>Unauthorised access to the construction site that can pose a risk to the public in terms of their safety.</li> <li>Unsafe working conditions.</li> </ul> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>The construction site must be demarcated (fenced or delineated with danger tape). Permanent demarcation is preferable to prevent the public from gaining access to the site.</li> <li>Signage indicating that the site is a “Construction Site” and indicating the risks associated with the site must be displayed. Emergency numbers, “No-smoking” signs and “No Open Flame” signs must also be displayed at the construction site.</li> <li>Fire-fighting equipment must be placed at the construction site and must be easily accessible.</li> <li>A fully equipped First Aid Kit must be readily available onsite.</li> </ul>
<p>Workers being unaware of the dangers of working at the construction site, resulting in a risk to their safety.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>Before any employees or contractors commence work at the proposed project site, each individual must undergo an Induction Training session that will cover the aspects as detailed in the Environmental Awareness Plan (contained in the EMPr). Attendance registers must be completed and kept on file.</li> <li>Employees and contract workers must be issued with suitable Personal Protective Equipment (PPE), as applicable to each persons’ job onsite.</li> </ul>
<b>Surface and Groundwater</b>	
<b>Construction Phase</b>	
<p>Pollution of surface and/or groundwater resources due to hydrocarbon spillages or leakages from construction vehicles.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>Spill kits must be onsite to clean up any hydrocarbon spillages.</li> <li>Vehicles should regularly be inspected to ensure that any fuel or oil leaks are repaired.</li> <li>Vehicles must be serviced in designated areas and on impermeable surfaces.</li> <li>All construction vehicles must be parked in designated areas and on impermeable surfaces.</li> </ul>
<p>Pollution of surface and/or groundwater resources due to spillages from chemical toilets.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>Sufficient ablution facilities must be provided.</li> <li>Chemical toilets must be serviced regularly.</li> <li>Any spillages from the chemical toilets must immediately be cleaned and the contaminated soil disposed of as hazardous waste.</li> </ul>
<p>Pollution of surface and/or groundwater resources due to the incorrect management, storage and disposal of construction waste.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>Construction waste must be stored in a designated area.</li> <li>Building rubble must be stored separately from domestic waste.</li> <li>Refuse bins must be provided for domestic waste.</li> <li>Building rubble must be kept clean of plastic and brick ties.</li> <li>Large volumes of waste may not accumulate onsite.</li> </ul>
<p>Pollution of surface and/or groundwater resources due to the runoff of contaminated storm water.</p>	<ul style="list-style-type: none"> <li>Storm water must be diverted around areas where there are pollution sources.</li> <li>No contaminated storm water may be released into the environment from construction activities.</li> </ul>

Impact	Possible mitigation measures
Residual risk: None anticipated.	<ul style="list-style-type: none"> <li>Storm water drainage infrastructure must be regularly inspected for obstructions.</li> </ul>
<p>Pollution of surface and/or groundwater resources from the mixing of concrete.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>Concrete should ideally be mixed on an impermeable surface such as a concrete slab.</li> <li>Bricklayers and plasters are to keep the working area clean of any spill or run-off.</li> <li>Contaminated soil as a result of a cement or concrete spillage must be removed immediately and disposed of in the correct manner.</li> <li>Cement bags (new and used) must be stored under roof or in closed containers where they will not be exposed to rain.</li> <li>Dry concrete must be removed and disposed of together with other building rubble.</li> </ul>
<p>The wastage of water resources due to the irresponsible use of water.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>Water pipes and hoses should be inspected on a regular basis and any leakages should immediately be repaired.</li> <li>Running water taps or hoses may not be left unattended.</li> </ul>
Operational Phase	
<p>Pollution of surface and/or groundwater resources due to hydrocarbon spillages or leakages from vehicles.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>Spill kits must be onsite to clean up any hydrocarbon spillages.</li> <li>Vehicles should regularly be inspected to ensure that any fuel or oil leaks are repaired.</li> </ul>
<p>Pollution of surface and/or groundwater resources due to the incorrect management, storage and disposal of waste.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>Waste must be managed according to its hazard classification (i.e. general vs. hazardous waste) and general and hazardous waste streams should not be mixed.</li> <li>Waste stored onsite must be kept in appropriate containers with lids that can be closed.</li> <li>Waste must be taken to appropriately licensed facilities for reuse, recycling, recovery or disposal (last resort).</li> </ul>
<p>Pollution of surface and/or groundwater resources due to the runoff of contaminated stormwater.</p>	<ul style="list-style-type: none"> <li>Storm water must be diverted around areas where there are pollution sources.</li> <li>Storm water drainage infrastructure must be regularly inspected for obstructions.</li> <li>No contaminated storm water may be released into the environment from the construction activities.</li> <li>Washing or cleaning of equipment or machinery must occur in a designated area and the contaminated wash water must be contained. Such an area could be a plastic drum, a container or a plastic lined pit.</li> <li>Wash water from the wash bay must be contained and not released into the environment.</li> </ul>
<p>Pollution of surface and/or groundwater resources due to leakages from the sewerage network (pipelines) onsite.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>Ablution facilities must regularly be cleaned.</li> <li>Should toilets run slowly or become blocked, this should be investigated to ensure that this is not due to a broken or blocked pipe underground.</li> <li>Any broken or blocked pipes must be repaired.</li> </ul>

Impact	Possible mitigation measures
<p>Pollution of surface and/or groundwater resources due to the operation of a cemetery.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>• Water quality monitoring must be undertaken to detect any contamination of water resources.</li> <li>• No graves to be built within 100 metres of drinking water resources.</li> <li>• Any open graves showing water intrusion should not be utilised.</li> <li>• Proper storm water management and subsurface drainage must be implemented to reduce the impacts of waterlogging and perched water systems.</li> </ul>
<p>The wastage of resources (water supply and electricity) due to the irresponsible use of water and electricity.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>• Consumption of water and electricity must be monitored.</li> <li>• Use energy efficient lighting, where possible.</li> <li>• Switch off lights and appliances when not in use.</li> <li>• Water pipes and hoses should be inspected on a regular basis and any leakages should immediately be repaired.</li> <li>• Running water taps or hoses may not be left unattended.</li> </ul>
<p><b>Post-construction and Rehabilitation Phase</b></p>	
<p>Pollution of surface and/or groundwater resources due to hydrocarbon spillages or leakages from construction vehicles.</p> <p>Residual risk: None anticipated.</p>	<p>Same mitigation measures as under construction phase.</p>
<p><b>Fauna</b></p>	
<p><b>Construction Phase</b></p>	
<p>Loss of low quality fauna habitat (degraded/disturbed vegetation cover) during site clearance.</p> <p>Residual risk: None anticipated.</p>	<p>No mitigation measures required as the site is in a degraded/disturbed state.</p>
<p>Disturbance of any fauna species that may be present onsite.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>• Fauna species may not be disturbed, captured or killed.</li> <li>• Should animals be encountered during the development, these should be relocated (by a suitably qualified specialist) to natural vegetation areas in the vicinity of the site.</li> </ul>
<p><b>Operational Phase</b></p>	
<p>Disturbance of any fauna species that may be present onsite.</p> <p>Residual risk: None anticipated.</p>	<p>Same mitigation measures as under construction phase.</p>
<p>Provision of artificial habitat for fauna species.</p> <p>Residual risk: Not applicable.</p>	<p>This is a positive impact and no mitigation measures are therefore required.</p>
<p><b>Post-construction and Rehabilitation Phase</b></p>	
<p>Disturbance of any fauna species that may be present onsite.</p>	<p>Same mitigation measures as under construction phase.</p>

Impact		Possible mitigation measures
Residual risk: None anticipated.		
<b>Flora</b>		
<b>Construction Phase</b>		
Loss of degraded/disturbed vegetation (Eastern Highveld grassland) during site clearance.	No mitigation measures required as the site is in a degraded/disturbed state.	
Residual risk: None anticipated.		
Spread of alien invasive vegetation.	<ul style="list-style-type: none"> <li>• Use only indigenous plant species for gardens and rehabilitation.</li> <li>• Eradicate any alien invasive vegetation observed onsite.</li> </ul>	
Residual risk: None anticipated.		
<b>Operational Phase</b>		
Establishment and spread of alien invasive vegetation (onsite and further than the site).	Same mitigation measures as under construction phase.	
Residual risk: None anticipated.		
<b>Post-construction and Rehabilitation Phase</b>		
Establishment and spread of alien invasive vegetation (onsite and further than the site).	Same mitigation measures as under construction phase.	
Residual risk: None anticipated.		
<b>Heritage Resources</b>		
<b>Construction Phase</b>		
Disturbance or destruction of cultural and heritage resources.	If any cultural or heritage resources, sites, features or objects are exposed during the construction activities, all construction activities in the area must be stopped and a heritage specialist must be contacted to investigate the site and recommend the way forward.	
Residual risk: None anticipated.		
<b>Operational Phase</b>		
None anticipated.	Not applicable.	
Residual risk: None anticipated.		
<b>Post-construction and Rehabilitation Phase</b>		
None anticipated.	Not applicable.	
Residual risk: None anticipated.		
<b>Palaeontological Resources</b>		
<b>Construction Phase</b>		
Very high possibility that significant fossil assemblages will be present beneath the site. The disturbance and/or destruction of the fossil assemblages.	<ul style="list-style-type: none"> <li>• A field assessment by a qualified palaeontologist must be conducted.</li> <li>• A Protocol of Fossil Finds must be compiled and submitted to the South African Heritage Resources Agency. The protocol must be implemented during the construction phase.</li> </ul>	
Residual risk: None anticipated.		



Impact	Possible mitigation measures
<b>Operational Phase</b>	
None anticipated. Residual risk: None anticipated.	Not applicable.
<b>Post-construction and Rehabilitation Phase</b>	
None anticipated. Residual risk: None anticipated.	Not applicable.
<b>Air Quality and Noise</b>	
<b>Construction Phase</b>	
Generation of dust by construction vehicles.  Residual risk: None anticipated.	<ul style="list-style-type: none"> <li>• Implement dust suppression techniques.</li> <li>• Limit vegetation clearance until it is necessary for soil stripping.</li> <li>• A complaints register must be kept onsite and be easily accessible to any party who wishes to lodge a complaint. The complaints register must include the following fields: <ul style="list-style-type: none"> <li>▪ The date of the complaint;</li> <li>▪ The name and surname of the person lodging the complaint;</li> <li>▪ Details of the complaint; and</li> <li>▪ How and when the complaint was addressed.</li> </ul> </li> </ul>
Release of emissions from construction vehicles.  Residual risk: None anticipated.	<ul style="list-style-type: none"> <li>• Regular maintenance of vehicles to minimise the release of emissions.</li> <li>• Vehicles must be left idling unnecessarily.</li> </ul>
Generation of nuisance and noise from construction vehicles and equipment/machinery.  Residual risk: None anticipated.	<ul style="list-style-type: none"> <li>• Noisy activities must be scheduled during times of the day that will result in the least disturbance to adjacent sensitive receptors.</li> <li>• Noisy work must be avoided on weekends and public holidays.</li> <li>• Vehicles must not be left idling unnecessarily.</li> <li>• All vehicles must be regularly maintained.</li> </ul>
<b>Operational Phase</b>	
Generation of dust by vehicles onsite.  Residual risk: None anticipated.	<ul style="list-style-type: none"> <li>• Implement dust suppression techniques, if required (for example, if there are any unpaved areas).</li> </ul>
Release of emissions from vehicles.  Residual risk: None anticipated.	Same mitigation measures as under construction phase.
Generation of nuisance and noise from vehicles.  Residual risk: None anticipated.	Same mitigation measures as under construction phase.
<b>Post-construction and Rehabilitation Phase</b>	
Generation of dust by construction vehicles.  Residual risk: None anticipated.	Same mitigation measures as under construction phase.

Impact	Possible mitigation measures
<p>Release of emissions from construction vehicles.</p> <p>Residual risk: None anticipated.</p>	<p>Same mitigation measures as under construction phase.</p>
<p>Generation of nuisance and noise from construction vehicles and equipment/machinery.</p> <p>Residual risk: None anticipated.</p>	<p>Same mitigation measures as under construction phase.</p>
<b>Soil</b>	
<b>Construction Phase</b>	
<p>Soil pollution due to hydrocarbon spillages or leakages from construction vehicles.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>• Use drip trays for any machinery and/or vehicle repair work.</li> <li>• Immediately repair any leaking machinery or vehicles.</li> <li>• Place oil drums on impermeable surfaces or plastic liners.</li> <li>• Immediately clean any hydrocarbon spillages and dispose of as hazardous waste.</li> </ul>
<p>Soil pollution due to spillages from chemical toilets.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>• Sufficient ablution facilities must be provided.</li> <li>• Chemical toilets must be serviced regularly.</li> <li>• Any spillages from the chemical toilets must immediately be cleaned and the contaminated soil disposed of as hazardous waste.</li> </ul>
<p>Soil pollution due to the incorrect management, storage and disposal of waste (general and hazardous waste).</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>• Waste must be managed according to its hazard classification (i.e. general vs. hazardous waste) and general and hazardous waste streams should not be mixed.</li> <li>• Waste stored onsite must be kept in appropriate containers with lids that can be closed.</li> <li>• Waste must be taken to appropriately licensed facilities for reuse, recycling, recovery or disposal.</li> </ul>
<p>Soil pollution of surface and/or groundwater resources from the mixing of concrete.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>• Concrete should ideally be mixed on an impermeable surface such as a concrete slab.</li> <li>• Bricklayers and plasters are to keep the working area clean of any spill or run-off.</li> <li>• Contaminated soil as a result of a cement or concrete spillage must be removed immediately and disposed of in the correct manner.</li> <li>• Cement bags (new and used) must be stored under roof or in closed containers where they will not be exposed to rain.</li> <li>• Dry concrete must be removed and disposed of together with other building rubble.</li> </ul>
<p>Soil erosion due to the clearance of vegetation and the removal of topsoil and subsoil.</p> <p>Residual risk: None anticipated.</p>	<ul style="list-style-type: none"> <li>• Limit vegetation clearance until it is necessary for soil stripping.</li> <li>• Implement adequate erosion prevention measures, such as measures to dissipate runoff water velocities.</li> <li>• Implement adequate storm water management measures.</li> </ul>
<p>Soil compaction to create foundations for buildings and other associated infrastructure.</p>	<ul style="list-style-type: none"> <li>• Soils should be moved when dry, as far as possible.</li> <li>• Excessively heavy vehicles should not be used for earthmoving activities. This will minimise compaction of the soil.</li> </ul>

Impact	Possible mitigation measures
Residual risk: None anticipated.	
Degradation of topsoil due to incorrect storage practices.	<ul style="list-style-type: none"> <li>• Topsoil and subsoil must be stored on separate stockpiles.</li> <li>• Cover topsoil stockpiles to prevent the soil being washed away during rainfall events.</li> </ul>
Residual risk: None anticipated.	
<b>Operational Phase</b>	
Soil pollution due to hydrocarbon spillages or leakages from vehicles.	Same mitigation measures as under construction phase.
Residual risk: None anticipated.	
Soil pollution due to the incorrect management, storage and disposal of waste (general and hazardous waste).	Same mitigation measures as under construction phase.
Residual risk: None anticipated.	
Soil pollution due to leakages from the sewerage network (pipelines) onsite.	<ul style="list-style-type: none"> <li>• Ablution facilities must regularly be cleaned.</li> <li>• Should toilets run slowly or become blocked, this should be investigated to ensure that this is not due to a broken or blocked pipe underground.</li> <li>• Any broken or blocked pipes must be repaired.</li> </ul>
Residual risk: None anticipated.	
<b>Post-construction and Rehabilitation Phase</b>	
Soil erosion due to inefficient rehabilitation of construction areas.	<ul style="list-style-type: none"> <li>• Rehabilitation must already be initiated during the construction phase, where possible.</li> </ul>
Residual risk: None anticipated.	
<b>Socio-economic</b>	
<b>Construction Phase</b>	
Generation of a number of employment opportunities.	This is a positive impact and no mitigation measures are therefore required.
Residual risk: Not applicable.	
Potential increase in crime due to the influx of workers.	<ul style="list-style-type: none"> <li>• Reference checks should be conducted on all workers before they are appointed.</li> <li>• Workers should not be allowed to leave the construction site during the day and should be transported to and from the site on a daily basis.</li> </ul>
Residual risk: None anticipated.	
Stimulation of the local economy.	This is a positive impact and no mitigation measures are therefore required.
Residual risk: Not applicable.	
<b>Operational Phase</b>	
Generation of a number of employment opportunities.	This is a positive impact and no mitigation measures are therefore required.
Residual risk: Not applicable.	
Stimulation of the local economy.	This is a positive impact and no mitigation measures are therefore required.

Impact	Possible mitigation measures
Residual risk: Not applicable.	
<b>Post-construction and Rehabilitation Phase</b>	
Generation of a number of employment opportunities.	This is a positive impact and no mitigation measures are therefore required.
Residual risk: Not applicable.	
Stimulation of the local economy.	This is a positive impact and no mitigation measures are therefore required.
Residual risk: Not applicable.	
<b>Traffic</b>	
<b>Construction Phase</b>	
Increase in traffic volumes to the site.	<ul style="list-style-type: none"> <li>• Ensure that construction vehicles are roadworthy and that drivers comply with road rules.</li> </ul>
Residual risk: None anticipated.	<ul style="list-style-type: none"> <li>• Loads must be securely fastened and may not exceed the tonnage limitations for each vehicle.</li> <li>• Provide separate entry and exit gateways for pedestrians and vehicles.</li> <li>• Plan storage areas so that delivery vehicles do not need to cross the site.</li> <li>• Construction vehicles to make use of roads with less vehicle movement.</li> </ul>
<b>Operational Phase</b>	
None anticipated.	Not applicable.
Residual risk: None anticipated.	
<b>Post-construction and Rehabilitation Phase</b>	
None anticipated.	Not applicable.
Residual risk: None anticipated.	
<b>Fire Risk</b>	
<b>Construction Phase</b>	
The potential for fire establishment at the construction area and its subsequent risk to human life and infrastructure.	<ul style="list-style-type: none"> <li>• Access to fire-fighting equipment must at all times be unobstructed.</li> <li>• Emergency numbers must be clearly displayed at the construction site.</li> <li>• Where welding, hot-work and flame-cutting are undertaken, fire-fighting equipment must be at hand.</li> </ul>
Residual risk: None anticipated.	
<b>Operational Phase</b>	
The potential for fire establishment or explosions at the proposed site and its subsequent risk to human life and infrastructure.	<ul style="list-style-type: none"> <li>• An Emergency Response Plan must be compiled for the proposed site.</li> <li>• The fire-fighting system and all fire-fighting equipment must be inspected on an annual basis by a suitably qualified person and records kept on file.</li> <li>• The fire-fighting system and all fire-fighting equipment must be to the satisfaction of the municipal fire authority.</li> </ul>
Residual risk: None anticipated.	
<b>Post-construction and Rehabilitation Phase</b>	
None anticipated.	Not applicable.

Impact	Possible mitigation measures
Residual risk: None anticipated.	

### 8.8 Outcome of the site selection matrix

The outcome of the site selection matrix was discussed under Section 8.1.1 of this report.

### 8.9 Motivation for not considering alternatives

The motivation for not considering certain alternatives was discussed under Section 8.1 of this report.

### 8.10 Concluding statement

The preferred alternative is the proposed project/development (Mixed Use Development on the Remaining Extent of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS for Industrial Use and Cemetery) and the preferred location for the development is the project property, as detailed under Section 4 of this report.

## 9. THE PROCESS UNDERTAKEN TO IDENTIFY, ASSESS AND RANK THE IMPACTS THAT THE ACTIVITY WILL IMPOSE ON THE PREFERRED LOCATION THROUGH THE LIFE OF THE ACTIVITY

According to the Environmental Impact Assessment Regulations, 2014, the objective of the basic environmental impact assessment process is to, through a consultative process-

- (a) determine the policy and legislative context within which the activity is located and document how the proposed activity complies with and responds to the policy and legislative context;
- (b) identify the alternatives considered, including the activity, location, and technology alternatives;
- (c) describe the need and desirability of the proposed alternatives;
- (d) through the undertaking of an impact and risk assessment process, inclusive of cumulative impacts which focused on determining the geographical, physical, biological, social, economic, heritage, and cultural sensitivity of the sites and locations within sites and the risk of impact of the proposed activity and technology alternatives on these aspects to determine–
  - (i) the nature, significance, consequence, extent, duration, and probability of the impacts occurring to; and
  - (ii) the degree to which these impacts–
    - (aa) can be reversed;
    - (bb) may cause irreplaceable loss of resources; and
    - (cc) can be avoided, managed or mitigated; and
- (e) through a ranking of the site sensitivities and possible impacts the activity and technology alternatives will impose on the sites and location identified through the life of the activity to–
  - (i) identify and motivate a preferred site, activity and technology alternative;
  - (ii) identify suitable measures to avoid, manage or mitigate identified impacts; and
  - (iii) identify residual risks that need to be managed and monitored.

### 9.1 Description of all environmental issues and risks that were identified during the Environmental Impact Assessment process – process undertaken

Elements of the proposed development that can interact with the environment are deemed to be environmental aspects. These have been identified during the Environmental Impact Assessment process, for each phase of the proposed development. Thereafter, the potential impacts that can result from the development's aspects have been identified. The impacts, whether positive or negative, are defined as any change to the environment resulting from the identified environmental aspects.

All environmental issues and risks that were identified as part of this Environmental Impact Assessment process have been listed under Section 8.4 of this report. The aspects can be seen in the tables under Section 9.3 of this report.

## 9.2 Assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures – process undertaken

Assessing the significance of the potential impacts has been conducted using the following parameters. Direct, indirect and cumulative impacts have been assessed.

The **nature** of the impact: This will include a qualitative description of what caused the impact and how it will affect the environment;

The **extent** of the impact: The size (physical/geographical) that will be affected by the impact. The following weighting will be used:

- Onsite: Weighting value **1**: The impact is confined to the project site/property
- Local: Weighting value **2**: The impact is confined to the project site/property and a 10km radius around the project site/property
- Regional: Weighting value **3**: The impact extends further than a 10km radius around the project site/property

The **duration** of the impact: The length of time over which the impact will persist. The following weighting will be used:

- Short term: Weighting value **1**: The impact will persist for up to one year
- Medium term: Weighting value **2**: The impact will persist for longer than one year, but shorter than five years
- Long term: Weighting value **3**: The impact will persist for longer than five years

The **magnitude** of the impact: The intensity of the impact on the environment. The following weighting will be used:

- Low: Weighting value **1**: Natural processes continue, albeit in an altered manner
- Medium: Weighting value **2**: Natural processes cease temporarily
- High: Weighting value **3**: Natural processes cease indefinitely

The **probability** of the impact: How likely it is that the impact will happen. The following weighting will be used:

- Improbable: Weighting value **1**: It is unlikely that the impact will occur
- Probable: Weighting value **2**: There is a chance that the impact will occur
- Definite: Weighting value **3**: The impact will most certainly occur

The **status** of the impact: This will include a qualitative description of the following:

- Whether the impact is **positive** or **negative** in nature
- The degree to which the impact can be reversed
- The degree to which the impact can be mitigated
- The degree to which the impact may cause irreplaceable loss of resources

The **significance** of the impact: This will be calculated using the formula below:

Significance = (Duration + Extent + Magnitude) x Probability

The significance of the impact will be divided into the following classes, based on the result of the above given equation:

- **Low Impact: Weighting value: 1-9**
- **Medium Impact: Weighting value: 10-18**
- **High Impact: Weighting value: 19-27**

The aspects to be assessed by specialists have been listed under Section 9.4. The impacts of the proposed project will be assessed by each specialist, mostly also using the following formula:

$$\text{Significance} = (\text{Duration} + \text{Extent} + \text{Magnitude}) \times \text{Probability}$$

### 9.3 Assessment of each identified potentially significant impact and risk, including cumulative impacts; the nature, significance and consequences of the impact and risk; the extent and duration of the impact and risk; the probability of the impact and risk occurring; the degree to which the impact and risk can be reversed; the degree to which the impact and risk may cause irreplaceable loss of resources; and the degree to which the impact and risk can be avoided, managed or mitigated

The following aspects have been assessed as part of the Environmental Impact Assessment process:

- Surface and groundwater;
- Fauna;
- Flora;
- Heritage resources;
- Palaeontological resources;
- Air quality and noise;
- Soil;
- Socio-economic;
- Traffic;
- Safety.

The following tables discuss the impacts and risks identified for each alternative, including the nature, significance, consequences, extent, duration and probability of the impacts, including the degree to which the impacts can be reversed; may cause irreplaceable loss of resources; and can be avoided, managed or mitigated.

### Preferred Alternative – Mixed Use Development on the Remaining Extent of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS for Industrial Use and Cemetery

#### Planning and Design Phase

<b>Aspect</b>	Planning and design of facilities.	
<b>Impact and Nature</b>	Inadequate planning and design of facilities that could result in environmental impacts that could have been avoided.	
<b>Impact Rating</b>	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Planning and Design Phase</b>		
<b>Extent</b>	2	1
<b>Duration</b>	3	2
<b>Magnitude</b>	2	1
<b>Probability</b>	2	1
<b>Significance</b>	<b>14 - Medium</b>	<b>4 - Low</b>
<b>Construction Phase</b>		
<b>Extent</b>		
<b>Duration</b>		
<b>Magnitude</b>		



Probability		
Significance		
<b>Operational Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Post-construction and Rehabilitation Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	High degree	

#### Pre-construction Phase

Aspect	Construction site establishment.	
Impact and Nature	<ul style="list-style-type: none"> <li>Unauthorised access to the construction site that can pose a risk to the public in terms of their safety.</li> <li>Unsafe working conditions.</li> </ul>	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Pre-construction Phase</b>		
Extent	1	1
Duration	2	1
Magnitude	3	2
Probability	2	1
Significance	<b>12 - Medium</b>	<b>4 - Low</b>

#### Construction Phase

Extent		
Duration		
Magnitude		
Probability		
Significance		

#### Operational Phase

Extent		
Duration		
Magnitude		
Probability		
Significance		

#### Post-construction and Rehabilitation Phase

Extent		
Duration		
Magnitude		
Probability		

Significance		
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	High degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
Aspect	Appointment of workers (employees and contractors) to commence construction activities onsite.	
Impact and Nature	Workers being unaware of the dangers of working at the construction site, resulting in a risk to their safety.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Pre-construction Phase</b>		
Extent	1	1
Duration	2	1
Magnitude	3	2
Probability	2	1
Significance	<b>12 - Medium</b>	<b>4 - Low</b>
<b>Construction Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Operational Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Post-construction and Rehabilitation Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	High degree	
Degree to which impact can be avoided, managed or mitigated	High degree	

## Surface and Groundwater

Aspect	Pollution of surface and/or groundwater resources.	
Impact and Nature	Hydrocarbon spillages or leakages from vehicles, including construction vehicles.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>

Construction Phase		
Extent	2	1
Duration	2	2
Magnitude	2	1
Probability	2	1
Significance	<b>12 - Medium</b>	<b>4 - Low</b>
Operational Phase		
Extent	2	1
Duration	3	2
Magnitude	3	2
Probability	2	1
Significance	<b>16 - Medium</b>	<b>5 - Low</b>
Post-construction and Rehabilitation Phase		
Extent	1	1
Duration	2	1
Magnitude	2	1
Probability	2	1
Significance	<b>10 - Medium</b>	<b>3 - Low</b>
Status of Impact		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
Aspect	Pollution of surface and/or groundwater resources.	
Impact and Nature	Spillages from chemical toilets (construction phase) and the sewerage network pipelines (operational phase).	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
Construction Phase		
Extent	2	1
Duration	2	1
Magnitude	3	2
Probability	2	1
Significance	<b>14 - Medium</b>	<b>4 - Low</b>
Operational Phase		
Extent	2	1
Duration	3	2
Magnitude	3	2
Probability	2	1
Significance	<b>16 - Medium</b>	<b>5 - Low</b>
Post-construction and Rehabilitation Phase		
Extent		
Duration		
Magnitude		
Probability		
Significance		
Status of Impact		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	

Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
Aspect	Mixing of concrete.	
Impact and Nature	Pollution of surface and/or groundwater resources.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent	2	1
Duration	2	1
Magnitude	3	2
Probability	2	1
Significance	<b>14 - Medium</b>	<b>4 - Low</b>
<b>Operational Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Post-construction and Rehabilitation Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
Aspect	Incorrect management, storage and disposal of waste, including construction waste.	
Impact and Nature	Pollution of surface and/or groundwater resources.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent	2	1
Duration	2	1
Magnitude	2	2
Probability	2	1
Significance	<b>12 - Medium</b>	<b>4 - Low</b>
<b>Operational Phase</b>		
Extent	2	1
Duration	3	2
Magnitude	3	2
Probability	2	1
Significance	<b>16 - Medium</b>	<b>5 - Low</b>
<b>Post-construction and Rehabilitation Phase</b>		
Extent		

Duration		
Magnitude		
Probability		
Significance		
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
Aspect	Runoff of contaminated stormwater.	
Impact and Nature	Pollution of surface and/or groundwater resources.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent	2	1
Duration	2	1
Magnitude	2	2
Probability	2	1
Significance	<b>12 - Medium</b>	<b>4 - Low</b>
<b>Operational Phase</b>		
Extent	2	1
Duration	3	2
Magnitude	3	2
Probability	2	1
Significance	<b>16 - Medium</b>	<b>5 - Low</b>
<b>Post-construction and Rehabilitation Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
Aspect	Pollution of surface and/or groundwater resources due to the operation of a cemetery.	
Impact and Nature	Pollution of surface and/or groundwater resources.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Operational Phase</b>		

Extent	2	2
Duration	3	2
Magnitude	3	3
Probability	2	2
Significance	<b>16 - Medium</b>	<b>14 - Medium</b>

**Post-construction and Rehabilitation Phase**

Extent		
Duration		
Magnitude		
Probability		
Significance		

**Status of Impact**

Consequence	Negative
Degree to which impact can be reversed	Low-Medium degree
Degree to which impact may cause irreplaceable loss of resources	Medium-High degree
Degree to which impact can be avoided, managed or mitigated	Medium degree

Aspect	The usage of water and electricity.	
Impact and Nature	Wastage of resources due to the irresponsible use.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>

**Construction Phase**

Extent	2	1
Duration	2	1
Magnitude	2	1
Probability	2	1
Significance	<b>12 - Medium</b>	<b>3 - Low</b>

**Operational Phase**

Extent	2	1
Duration	3	1
Magnitude	3	2
Probability	2	1
Significance	<b>16 - Medium</b>	<b>4 - Low</b>

**Post-construction and Rehabilitation Phase**

Extent		
Duration		
Magnitude		
Probability		
Significance		

**Status of Impact**

Consequence	Negative
Degree to which impact can be reversed	Medium degree
Degree to which impact may cause irreplaceable loss of resources	Medium degree
Degree to which impact can be avoided, managed or mitigated	High degree

**Fauna**

Aspect	Site clearance.
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Impact and Nature	Loss of low quality fauna habitat (degraded/disturbed vegetation cover), affecting the ecosystem, biological diversity and ecological integrity of the site.	
Impact Rating	Before mitigation	After mitigation
<b>Construction Phase</b>		
Extent	1	1
Duration	2	2
Magnitude	2	2
Probability	3	1
Significance	<b>15 - Medium</b>	<b>5 - Low</b>
<b>Operational Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Post-construction and Rehabilitation Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	High degree	
Degree to which impact may cause irreplaceable loss of resources	Low degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
Aspect	Construction, operation and rehabilitation activities.	
Impact and Nature	Disturbance of any fauna species that may be present onsite.	
Impact Rating	Before mitigation	After mitigation
<b>Construction Phase</b>		
Extent	1	1
Duration	2	1
Magnitude	2	1
Probability	2	1
Significance	<b>10 - Medium</b>	<b>3 - Low</b>
<b>Operational Phase</b>		
Extent	1	1
Duration	3	1
Magnitude	3	1
Probability	1	1
Significance	<b>7 - Low</b>	<b>3 - Low</b>
<b>Post-construction and Rehabilitation Phase</b>		
Extent	1	1
Duration	2	1
Magnitude	2	1
Probability	1	1
Significance	<b>5 - Low</b>	<b>3 - Low</b>
<b>Status of Impact</b>		

Consequence	Negative
Degree to which impact can be reversed	High degree
Degree to which impact may cause irreplaceable loss of resources	Low degree
Degree to which impact can be avoided, managed or mitigated	High degree

Aspect	Operational activities.	
Impact and Nature	Provision of artificial habitat for fauna species.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>

**Construction Phase**

Extent		
Duration		
Magnitude		
Probability		
Significance		

**Operational Phase**

Extent		
Duration		
Magnitude		
Probability		
Significance	Positive impact	No mitigation required – positive impact

**Post-construction and Rehabilitation Phase**

Extent		
Duration		
Magnitude		
Probability		
Significance		

**Status of Impact**

Consequence	Positive
Degree to which impact can be reversed	N/A – positive impact
Degree to which impact may cause irreplaceable loss of resources	N/A – positive impact
Degree to which impact can be avoided, managed or mitigated	N/A – positive impact

**Flora**

Aspect	Site clearance.	
Impact and Nature	Loss of degraded/disturbed vegetation (Eastern Highveld grassland).	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>

**Construction Phase**

Extent	1	1
Duration	3	2
Magnitude	2	1
Probability	3	1
Significance	<b>18 - Medium</b>	<b>4 - Low</b>

**Operational Phase**

Extent		
Duration		
Magnitude		
Probability		



Significance		
<b>Post-construction and Rehabilitation Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	High degree	
Degree to which impact may cause irreplaceable loss of resources	Low degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
Aspect	Construction, operation and rehabilitation activities.	
Impact and Nature	Establishment and spread of alien invasive vegetation (onsite and further than the site).	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent	2	1
Duration	2	1
Magnitude	2	1
Probability	3	2
Significance	<b>18 - Medium</b>	<b>6 - Low</b>
<b>Operational Phase</b>		
Extent	2	1
Duration	3	2
Magnitude	3	2
Probability	2	1
Significance	<b>16 - Medium</b>	<b>5 - Low</b>
<b>Post-construction and Rehabilitation Phase</b>		
Extent	2	1
Duration	2	2
Magnitude	2	2
Probability	3	1
Significance	<b>18 - Medium</b>	<b>5 - Low</b>
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	High degree	
Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	High degree	

## Heritage Resources

Aspect	Construction activities.	
Impact and Nature	Disturbance or destruction of cultural and heritage resources.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent	1	1
Duration	3	3

Magnitude	3	1
Probability	2	1
Significance	<b>14 - Medium</b>	<b>5 - Low</b>
<b>Operational Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Post-construction and Rehabilitation Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Low degree	
Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	High degree	

#### Palaeontological resources

Aspect	Construction activities.	
Impact and Nature	The disturbance and/or destruction of the fossil assemblages.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent	1	1
Duration	3	3
Magnitude	3	1
Probability	2	1
Significance	<b>14 - Medium</b>	<b>5 - Low</b>
<b>Operational Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Post-construction and Rehabilitation Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Low degree	
Degree to which impact may cause irreplaceable loss of resources	High degree	
Degree to which impact can be avoided, managed or mitigated	High degree	

## Air Quality and Noise

Aspect	Construction, operation and rehabilitation activities.	
Impact and Nature	Generation of dust by vehicles, including construction vehicles.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent	2	1
Duration	2	1
Magnitude	2	1
Probability	3	2
Significance	<b>18 - Medium</b>	<b>6 - Low</b>
<b>Operational Phase</b>		
Extent	2	1
Duration	3	1
Magnitude	3	2
Probability	2	2
Significance	<b>16 - Medium</b>	<b>8 - Low</b>
<b>Post-construction and Rehabilitation Phase</b>		
Extent	2	1
Duration	1	1
Magnitude	2	1
Probability	3	2
Significance	<b>15 - Medium</b>	<b>6 - Low</b>
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	High degree	

Aspect	Construction, operation and rehabilitation activities.	
Impact and Nature	Release of emissions from vehicles, including construction vehicles.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent	3	2
Duration	2	1
Magnitude	2	2
Probability	3	2
Significance	<b>21 - High</b>	<b>10 - Medium</b>
<b>Operational Phase</b>		
Extent	3	2
Duration	3	1
Magnitude	2	2
Probability	3	2
Significance	<b>24 - High</b>	<b>10 - Medium</b>
<b>Post-construction and Rehabilitation Phase</b>		
Extent	3	2
Duration	1	1
Magnitude	2	2
Probability	3	2
Significance	<b>18 - Medium</b>	<b>10 - Medium</b>

Status of Impact		
Consequence	Negative	
Degree to which impact can be reversed	Low degree	
Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	Low degree	
Aspect	Construction, operation and rehabilitation activities.	
Impact and Nature	Generation of nuisance and noise from vehicles (including construction vehicles) and equipment/machinery. This also includes nuisance and noise from maintenance activities.	
Impact Rating	Before mitigation	After mitigation
<b>Construction Phase</b>		
Extent	2	1
Duration	2	1
Magnitude	2	1
Probability	3	2
Significance	<b>18 - Medium</b>	<b>6 - Low</b>
<b>Operational Phase</b>		
Extent	2	1
Duration	3	1
Magnitude	3	1
Probability	2	2
Significance	<b>16 - Medium</b>	<b>6 - Low</b>
<b>Post-construction and Rehabilitation Phase</b>		
Extent	2	1
Duration	1	1
Magnitude	2	1
Probability	3	2
Significance	<b>15 - Medium</b>	<b>6 - Low</b>
Status of Impact		
Consequence	Negative	
Degree to which impact can be reversed	Low degree	
Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	Medium degree	

## Soil

Aspect	Hydrocarbon spillages or leakages from vehicles, including construction vehicles.	
Impact and Nature	Soil pollution.	
Impact Rating	Before mitigation	After mitigation
<b>Construction Phase</b>		
Extent	2	1
Duration	2	2
Magnitude	2	1
Probability	2	1

Significance	<b>12 - Medium</b>	<b>4 - Low</b>
<b>Operational Phase</b>		
Extent	2	1
Duration	3	2
Magnitude	3	2
Probability	2	1
Significance	<b>16 - Medium</b>	<b>5 - Low</b>
<b>Post-construction and Rehabilitation Phase</b>		
Extent	2	1
Duration	2	2
Magnitude	2	1
Probability	2	1
Significance	<b>12 - Medium</b>	<b>4 - Low</b>
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
Aspect	Spillages from chemical toilets (construction phase) or the sewerage network (operational phase).	
Impact and Nature	Soil pollution.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent	2	1
Duration	3	1
Magnitude	2	2
Probability	2	1
Significance	<b>14 - Medium</b>	<b>4 - Low</b>
<b>Operational Phase</b>		
Extent	2	1
Duration	3	1
Magnitude	3	2
Probability	2	1
Significance	<b>16 - Medium</b>	<b>4 - Low</b>
<b>Post-construction and Rehabilitation Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	High degree	

Aspect	The incorrect management, storage and disposal of waste (general and hazardous waste), including construction waste.	
Impact and Nature	Soil pollution.	
Impact Rating	Before mitigation	After mitigation
<b>Construction Phase</b>		
Extent	2	1
Duration	2	1
Magnitude	3	2
Probability	2	1
Significance	<b>14 - Medium</b>	<b>4 - Low</b>
<b>Operational Phase</b>		
Extent	2	1
Duration	3	1
Magnitude	3	2
Probability	2	1
Significance	<b>16 - Medium</b>	<b>4 - Low</b>
<b>Post-construction and Rehabilitation Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	Medium degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
Aspect	The mixing of concrete.	
Impact and Nature	Soil pollution.	
Impact Rating	Before mitigation	After mitigation
<b>Construction Phase</b>		
Extent	2	1
Duration	2	1
Magnitude	2	2
Probability	2	1
Significance	<b>12 - Medium</b>	<b>4 - Low</b>
<b>Operational Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Post-construction and Rehabilitation Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Status of Impact</b>		

Consequence	Negative
Degree to which impact can be reversed	Medium degree
Degree to which impact may cause irreplaceable loss of resources	Medium degree
Degree to which impact can be avoided, managed or mitigated	High degree

Aspect	The clearance of vegetation and the removal of topsoil and subsoil.	
Impact and Nature	Soil erosion.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>

Construction Phase		
Extent	1	1
Duration	2	1
Magnitude	3	1
Probability	3	2
Significance	<b>18 - Medium</b>	<b>6 - Low</b>

Operational Phase		
Extent		
Duration		
Magnitude		
Probability		
Significance		

Post-construction and Rehabilitation Phase		
Extent		
Duration		
Magnitude		
Probability		
Significance		

Status of Impact	
Consequence	Negative
Degree to which impact can be reversed	High degree
Degree to which impact may cause irreplaceable loss of resources	Low degree
Degree to which impact can be avoided, managed or mitigated	High degree

Aspect	Construction activities to create foundations for buildings and other associated infrastructure.	
Impact and Nature	Soil compaction.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>

Construction Phase		
Extent	1	1
Duration	3	1
Magnitude	3	1
Probability	2	2
Significance	<b>14 - Medium</b>	<b>6 - Low</b>

Operational Phase		
Extent		
Duration		
Magnitude		
Probability		
Significance		

Post-construction and Rehabilitation Phase		
Extent		
Duration		
Magnitude		
Probability		
Significance		
Status of Impact		
Consequence	Negative	
Degree to which impact can be reversed	High degree	
Degree to which impact may cause irreplaceable loss of resources	Low degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
Aspect	Incorrect storage practices.	
Impact and Nature	Degradation of topsoil.	
Impact Rating	Before mitigation	After mitigation
Construction Phase		
Extent	1	1
Duration	2	1
Magnitude	2	1
Probability	2	1
Significance	10 - Medium	3 - Low
Operational Phase		
Extent		
Duration		
Magnitude		
Probability		
Significance		
Post-construction and Rehabilitation Phase		
Extent		
Duration		
Magnitude		
Probability		
Significance		
Status of Impact		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	Low degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
Aspect	Inefficient rehabilitation of construction areas.	
Impact and Nature	Soil erosion.	
Impact Rating	Before mitigation	After mitigation
Construction Phase		
Extent		
Duration		
Magnitude		
Probability		
Significance		



Operational Phase		
Extent		
Duration		
Magnitude		
Probability		
Significance		
Post-construction and Rehabilitation Phase		
Extent	2	1
Duration	3	2
Magnitude	2	1
Probability	2	1
Significance	<b>14 - Medium</b>	<b>4 - Low</b>
Status of Impact		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	Low degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
<b>Socio-economic</b>		
Aspect	Construction, operational and rehabilitation activities.	
Impact and Nature	Generation of a number of employment opportunities.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
Construction Phase		
Extent		
Duration		
Magnitude		
Probability		
Significance	Positive impact	No mitigation required – positive impact
Operational Phase		
Extent		
Duration		
Magnitude		
Probability		
Significance	Positive impact	No mitigation required – positive impact
Post-construction and Rehabilitation Phase		
Extent		
Duration		
Magnitude		
Probability		
Significance	Positive impact	No mitigation required – positive impact
Status of Impact		
Consequence	Positive	
Degree to which impact can be reversed	N/A – Positive impact	
Degree to which impact may cause irreplaceable loss of resources	N/A – Positive impact	
Degree to which impact can be avoided, managed or mitigated	N/A – Positive impact	

Aspect	Construction activities.	
Impact and Nature	Potential increase in crime due to the influx of workers.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent	2	1
Duration	2	1
Magnitude	3	2
Probability	2	1
Significance	<b>14 - Medium</b>	<b>4 - Low</b>
<b>Operational Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Post-construction and Rehabilitation Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance		
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Low degree	
Degree to which impact may cause irreplaceable loss of resources	High degree	
Degree to which impact can be avoided, managed or mitigated	High degree	
Aspect	Construction, operational and rehabilitation activities.	
Impact and Nature	Stimulation of the local economy.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance	Positive impact	No mitigation required – positive impact
<b>Operational Phase</b>		
Extent		
Duration		
Magnitude		
Probability		
Significance	Positive impact	No mitigation required – positive impact
<b>Post-construction and Rehabilitation Phase</b>		
Extent		
Duration		
Magnitude		
Probability		

Significance	Positive impact	No mitigation required – positive impact
<b>Status of Impact</b>		
Consequence	Positive	
Degree to which impact can be reversed	N/A – Positive impact	
Degree to which impact may cause irreplaceable loss of resources	N/A – Positive impact	
Degree to which impact can be avoided, managed or mitigated	N/A – Positive impact	

### Traffic

Aspect	Construction activities.	
Impact and Nature	Increase in traffic volumes to the site.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent	2	2
Duration	2	2
Magnitude	2	1
Probability	3	2
Significance	<b>18 - Medium</b>	<b>10 - Medium</b>
<b>Operational Phase</b>		
Extent	2	2
Duration	3	3
Magnitude	2	1
Probability	3	2
Significance	<b>21 - High</b>	<b>12 - Medium</b>
<b>Post-construction and Rehabilitation Phase</b>		
Extent	2	2
Duration	1	1
Magnitude	2	2
Probability	3	2
Significance	<b>15 - Medium</b>	<b>10 - Medium</b>
<b>Status of Impact</b>		
Consequence	Negative	
Degree to which impact can be reversed	Medium degree	
Degree to which impact may cause irreplaceable loss of resources	Low degree	
Degree to which impact can be avoided, managed or mitigated	Low degree	

### Fire Risk

Aspect	Construction and operational activities.	
Impact and Nature	The potential for fire establishment at the project site and its subsequent risk to human life and infrastructure.	
Impact Rating	<b>Before mitigation</b>	<b>After mitigation</b>
<b>Construction Phase</b>		
Extent	2	1
Duration	2	1
Magnitude	3	2
Probability	2	1
Significance	<b>14 - Medium</b>	<b>4 - Low</b>

Operational Phase		
Extent	2	1
Duration	3	1
Magnitude	3	2
Probability	2	1
Significance	<b>16 - Medium</b>	<b>4 - Low</b>
Post-construction and Rehabilitation Phase		
Extent		
Duration		
Magnitude		
Probability		
Significance		
Status of Impact		
Consequence	Negative	
Degree to which impact can be reversed	Low degree	
Degree to which impact may cause irreplaceable loss of resources	High degree	
Degree to which impact can be avoided, managed or mitigated	High degree	

#### 9.4 A summary of the findings and impact management measures identified in any specialist reports complying with Appendix 6 of the EIA Regulations, 2014, and an indication as to how these findings and recommendations have been included in this Basic Assessment Report

The following specialist studies and the report thereof are included in the Basic Assessment Report (specialist reports are attached under Appendix D):

- SCIP Engineering Group (2021), Engineering Geological Investigation
- SCIP Engineering Group (2021), Civil Services Report

## 10. ENVIRONMENTAL IMPACT STATEMENT

### 10.1 Summary of the key findings of the Environmental Impact Assessment

The summary of the key findings of this Basic Environmental Impact Assessment process are as follows:

- The project site (the preferred location) is in a disturbed state. According to According to the Mpumalanga Biodiversity Sector Plan, the proposed site is “*CBA Optimal*”, “*Moderately Modified*” as well as “*Moderately Modified*”. The Terrestrial CBA Map further indicates that the project site is designated as of “Least Concern” with areas of “*No Natural Habitat Remaining*”.
- As per the Hydrology Map, no wetlands appear to be present on the proposed project site.
- As per the Civil Services Report (2021), proposed stormwater, water, sewerage and road infrastructure have been outlined and will ensure sustainable development outcomes.
- The proposed development will result in a positive socio-economic impact through the provision of a number of temporary and permanent employment opportunities, contribution to an already existing industrial node (Naauwpoort) for rendering of industrial services, provision of social services through the provision of a cemetery (private memorial park) and ultimately stimulation of the local economy of Emalaheleni and the Mpumalanga Province.
- The proposed development is in line with the Emalahleni’s Municipal Development Planning Frameworks;
- The environmental impacts associated with the proposed development have been identified and assessed in terms of their significance in this report. The most significant impacts relate to the release of emissions from vehicles; an increase in traffic to the project site and disturbance and/or destruction of the fossil assemblages; and
- The majority of the impacts are rated as having a “Medium” significance before mitigation, and a “Low” significance after mitigation.

## 10.2 Environmental sensitivity map

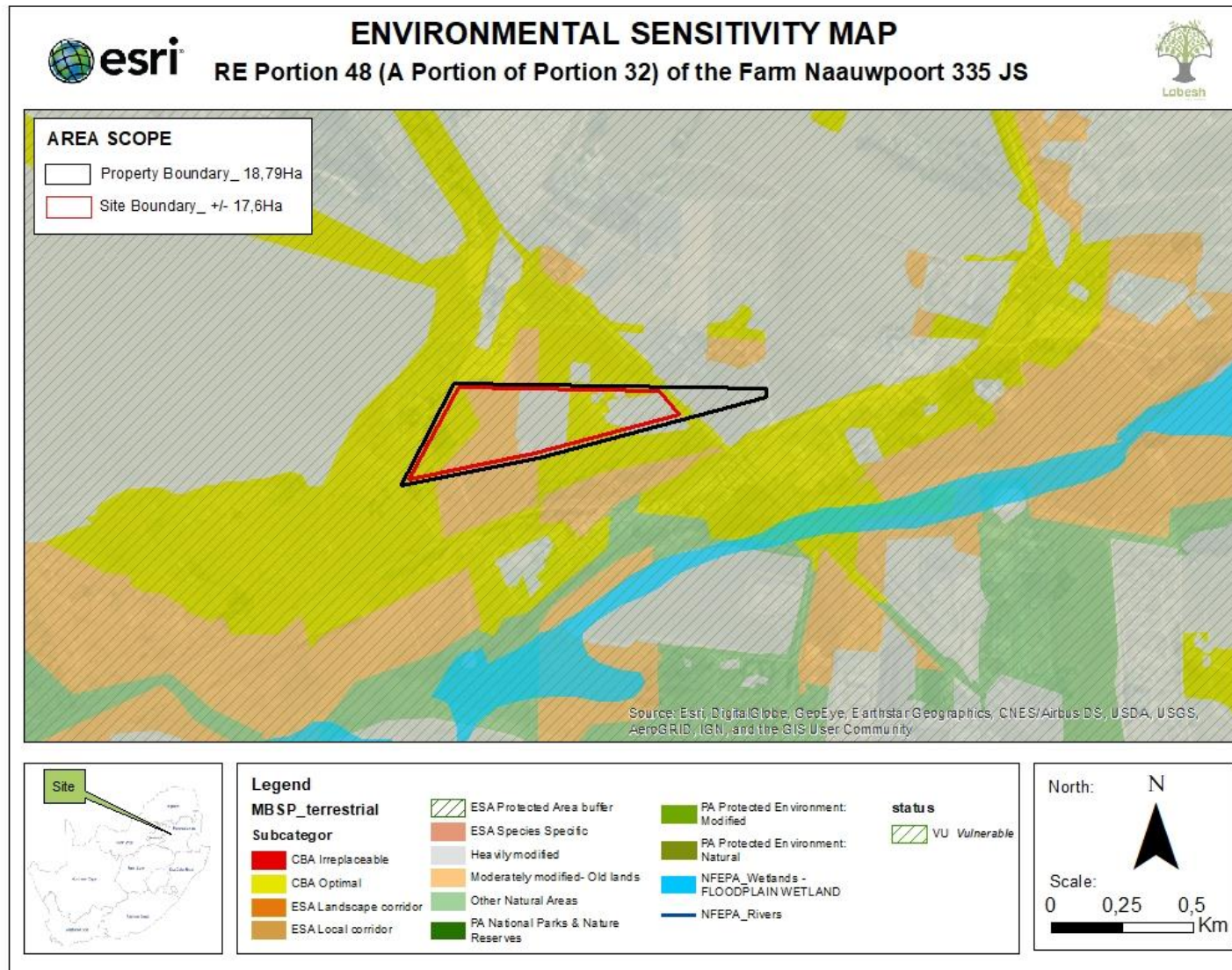


Figure 21: Sensitivity Map of the Project Site

### **10.3 Summary of the positive and negative impacts and risks of the proposed activity and identified alternatives**

The following main positive and potential negative impacts and risks have been identified for the proposed project:

#### **Positive impacts**

- The utilization of degraded, unutilized land;
- The generation of temporary and permanent employment opportunities;
- Contribution to an already existing industrial node (Naauwpoort) for rendering of industrial services;
- Contribution to the local economy through the provision of social services (cemetery); and
- The stimulation of the local economy.

#### **Negative impacts**

- Soil and water (surface- and ground water) pollution;
- Disturbance of fauna species;
- The spread of alien invasive vegetation;
- Disturbance or destruction of cultural and heritage resources;
- The disturbance and/or destruction of the fossil assemblages;
- Generation of dust;
- Release of atmospheric emissions;
- Generation of nuisance and noise;
- Soil erosion or compaction;
- Degradation of topsoil;
- Potential increase in crime;
- Increase in traffic volumes to the site; and
- The potential for fire establishment at the project site and its subsequent risk to human life and infrastructure.

### **10.4 Impact management measures from specialist reports and the recording of the proposed impact management outcomes for the development, for inclusion in the EMPr**

The following specialist studies and the report thereof are included in the Basic Assessment Report (specialist reports are attached under Appendix D):

- SCIP Engineering Group (2021), Engineering Geological Investigation
- SCIP Engineering Group (2021), Civil Services Report

## **10.5 Aspects which were conditional to the findings of the assessment either by the EAP or specialists and which are to be included as conditions of authorisation**

The following conditions must be included in the Environmental Authorisation, should the proposed development be authorised:

- A Protocol of Fossil Finds must be developed and submitted to SAHRA for approval prior to the development commencing. A Palaeontological Field Assessment must be carried out when the construction phase commences (should the proposed development be authorised);
- The mitigation measures contained in the Environmental Management Programme must be implemented during each developmental phase of the proposed project; and
- An independent Environmental Control Officer must be appointed to audit compliance to the Environmental Management Programme during the construction phase of the proposed development.

## **10.6 Description of assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures**

The following assumptions were made during this Basic Environmental Impact Assessment process:

- That all research and reference sources or material is accurate and up to date;
- That the project information, as provided by the applicant, is correct;
- That the facilities will be constructed as per the layout plans supplied from the applicant; and
- That the project site will be operated according to the Environmental Management Programme and in a responsible manner.

At this stage the fossil assemblages that may possibly be present beneath the project site are not known. This will be determined during the Field Assessment that will be undertaken during commencement of the construction phase of the proposed project.

## **10.7 Reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation**

It is Labesh's independent and reasoned opinion that the identified and assessed environmental impacts can be mitigated and that an Environmental Authorisation should therefore be issued for the proposed Establishment of a Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS for Industrial Use and Cemetery.

Please refer to Section 10.5 above for conditions that should be included in respect of the Environmental Authorisation.

## **10.8 Where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required, the date on which the activity will be concluded, and the post construction monitoring requirements finalised**

Not applicable. The proposed activity does include operational aspects.



## **11. ENVIRONMENTAL ASSESSMENT PRACTITIONER UNDERTAKING/ AFFIRMATION**

I, Lourens de Villiers, hereby confirm the following:

- The correctness of information provided in this Basic Assessment Report;
- The inclusion of all comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant ; and
- Any information provided by the EAP to I&APs and any responses by the EAP to comments or inputs made by I&APs have been included in this report.

I further confirm that I have no business, financial, personal or other interest in the activity or application in respect of which I have been appointed as EAP, in terms of the EIA Regulations, other than fair remuneration for work performed in connection with this application for Environmental Authorisation.

## **12. DETAILS OF ANY FINANCIAL PROVISION FOR THE REHABILITATION, CLOSURE, AND ONGOING POST DECOMMISSIONING MANAGEMENT OF NEGATIVE ENVIRONMENTAL IMPACTS**

No financial provisioning applicable to the proposed project.

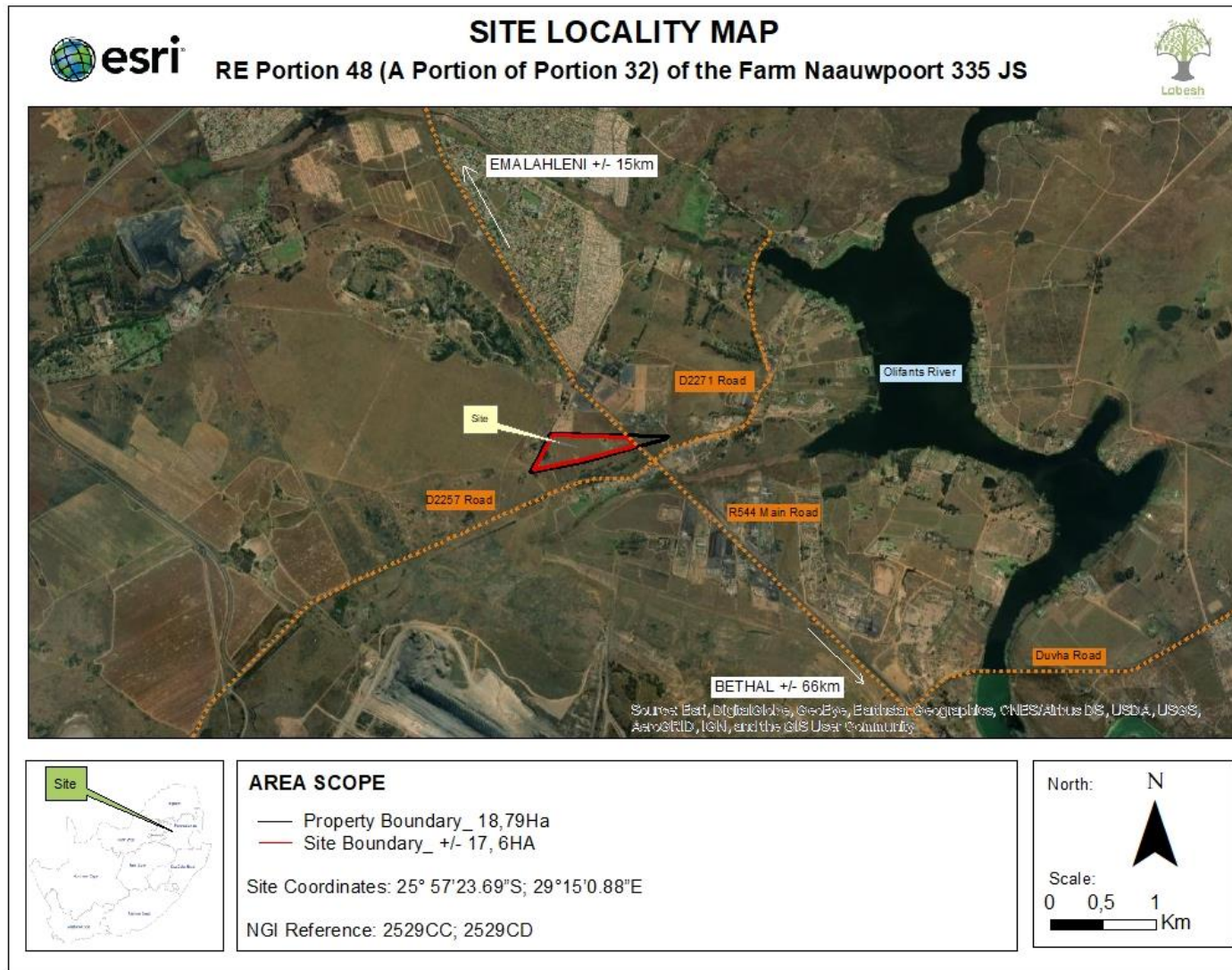
## **13. SPECIFIC INFORMATION REQUIRED BY THE COMPETENT AUTHORITY**

No specific information has been required by the Competent Authority at this stage of the application process.

## **14. OTHER MATTERS REQUIRED IN TERMS OF SECTION 24(4)(A) AND (B) OF NEMA**

At this stage, no other matters to address have been identified or required.

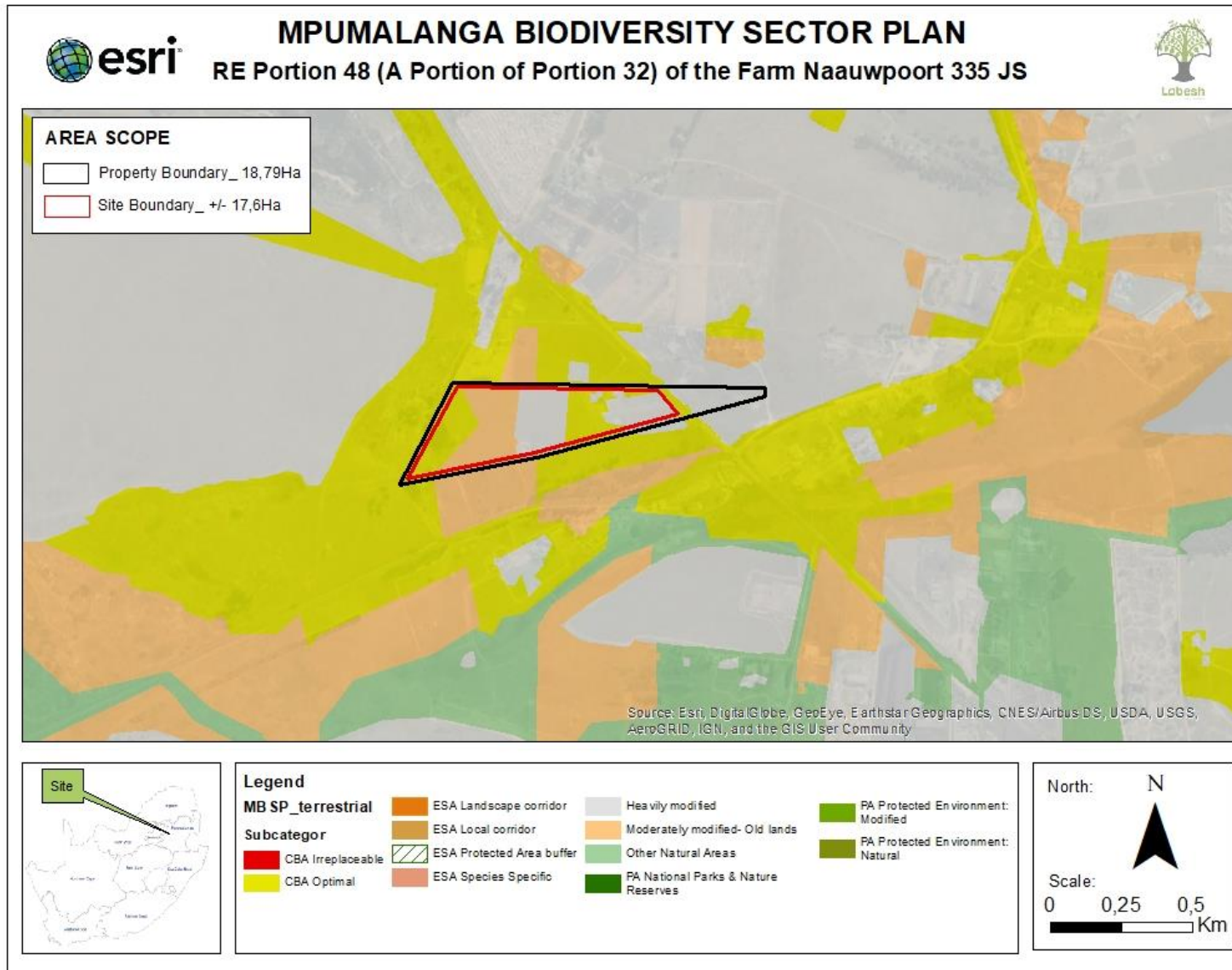
## APPENDIX A – Plans and Maps



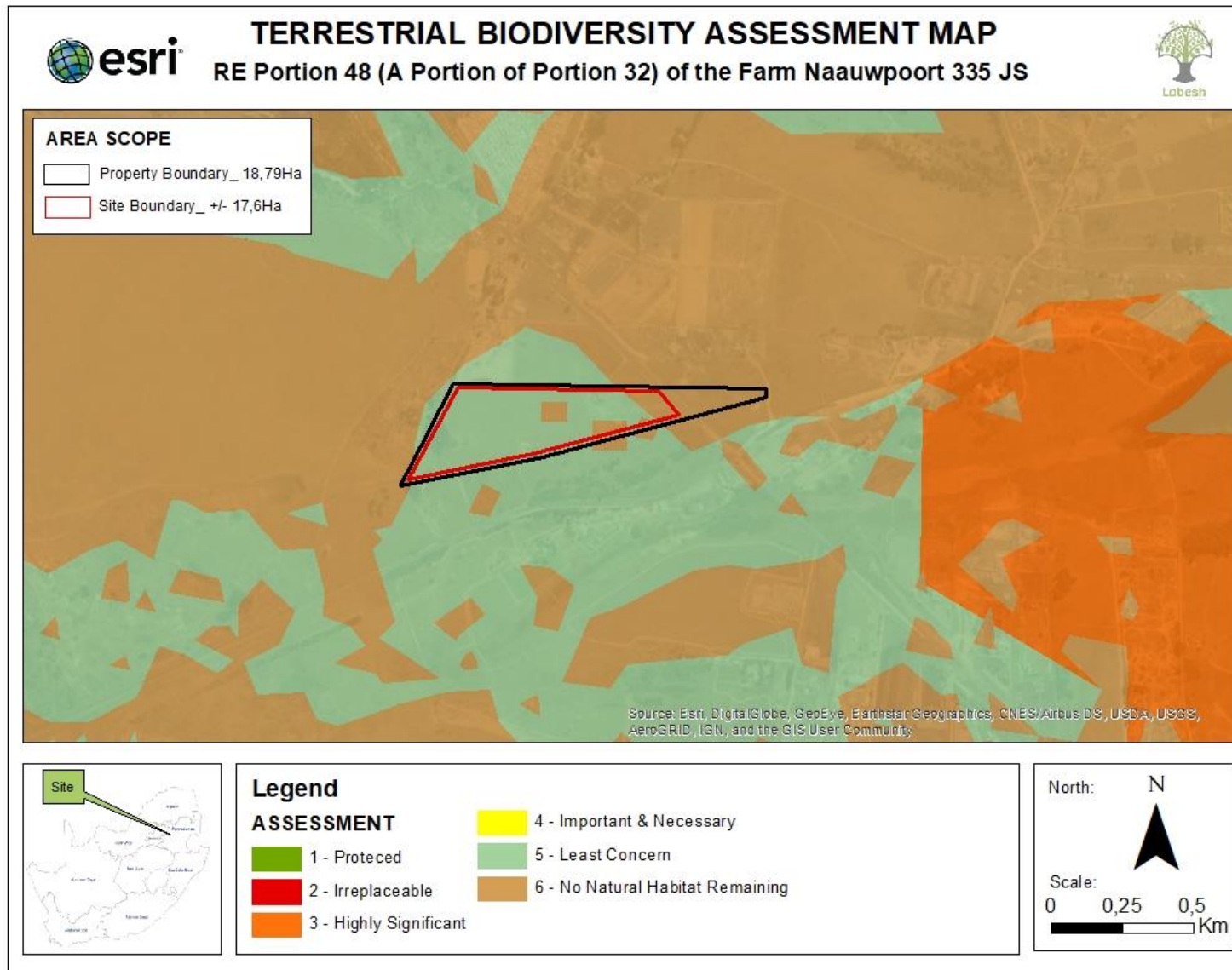
Site Locality Map



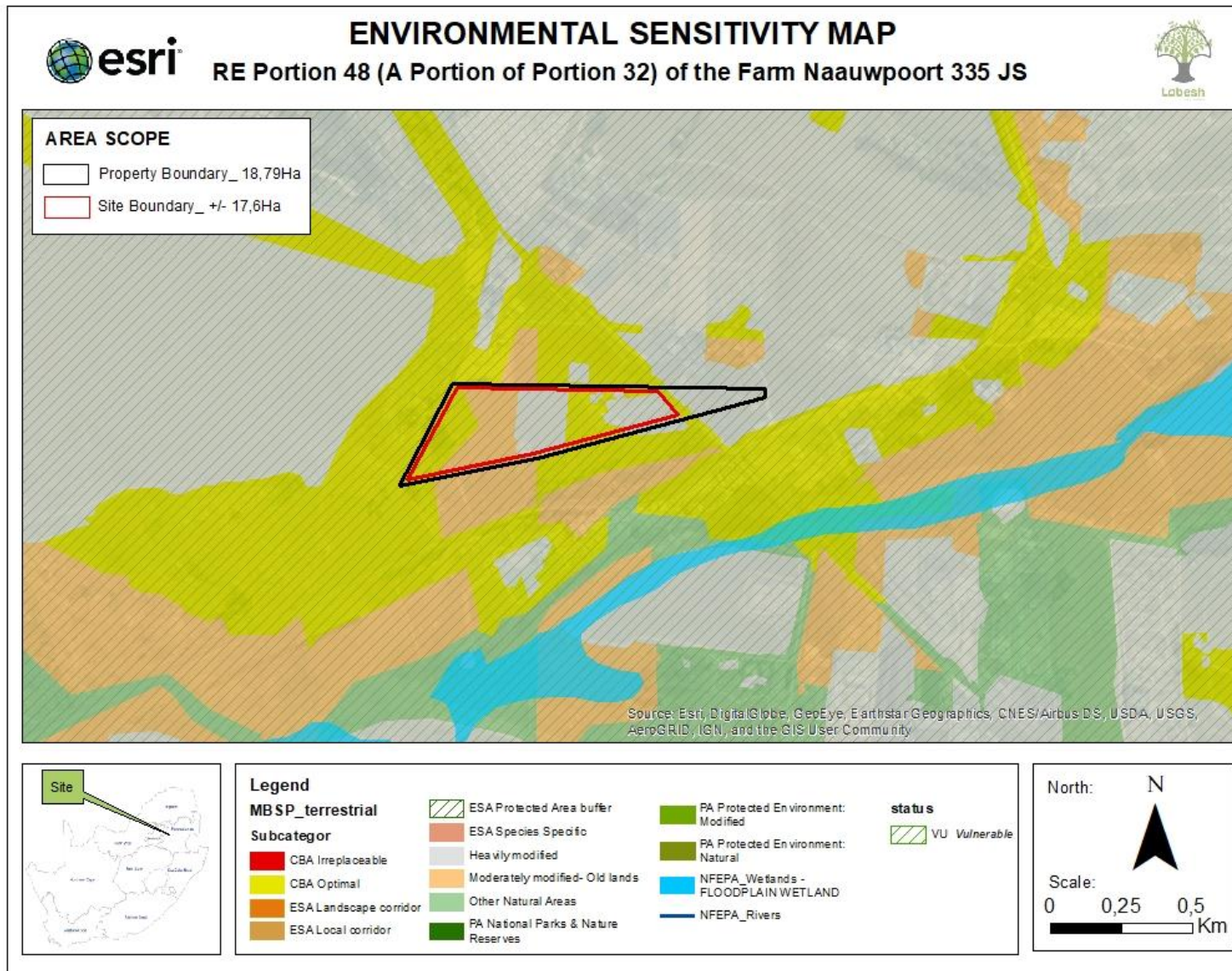
Facility illustration for the proposed project



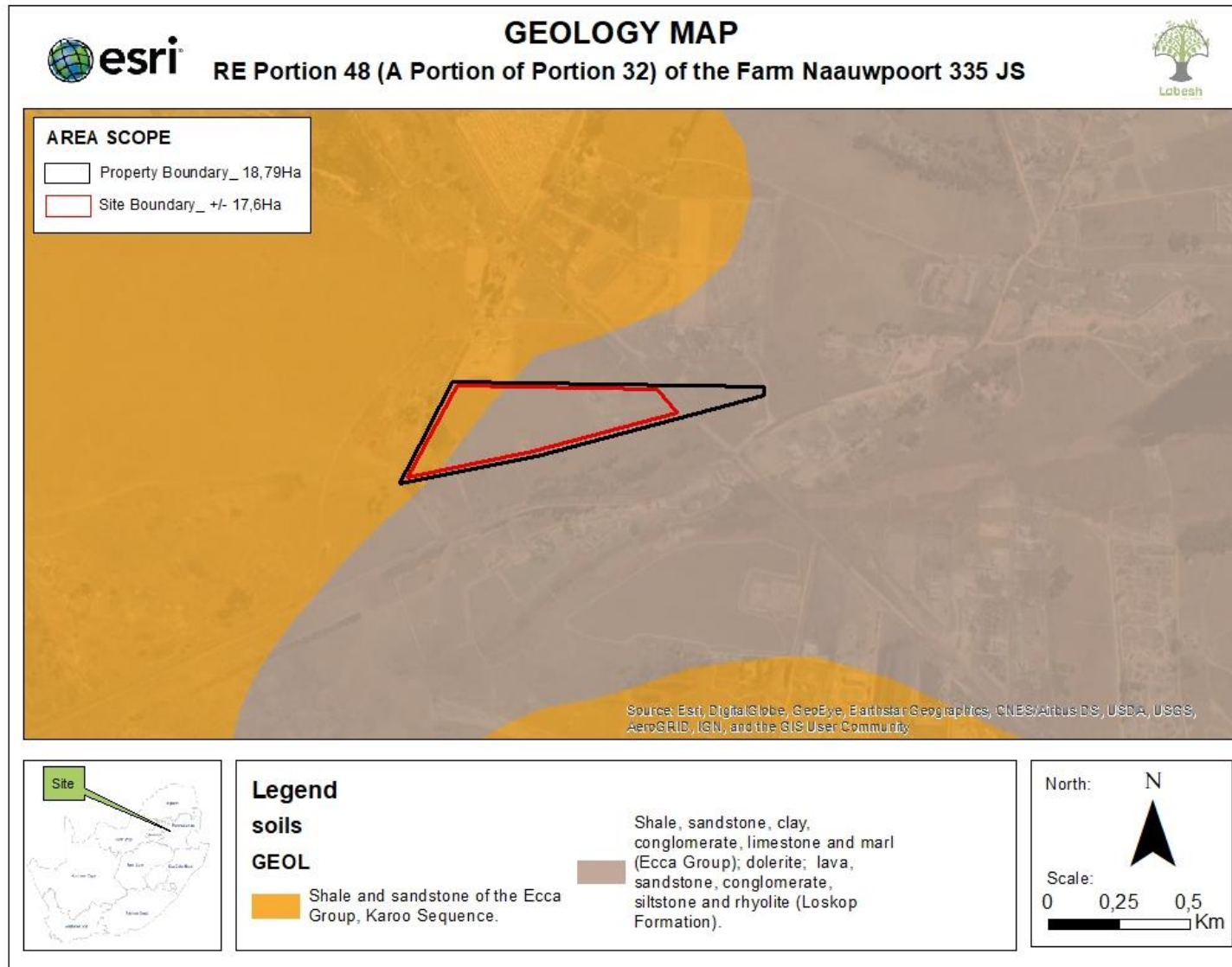
Mpumalanga Biodiversity Sector Plan Map of the project site



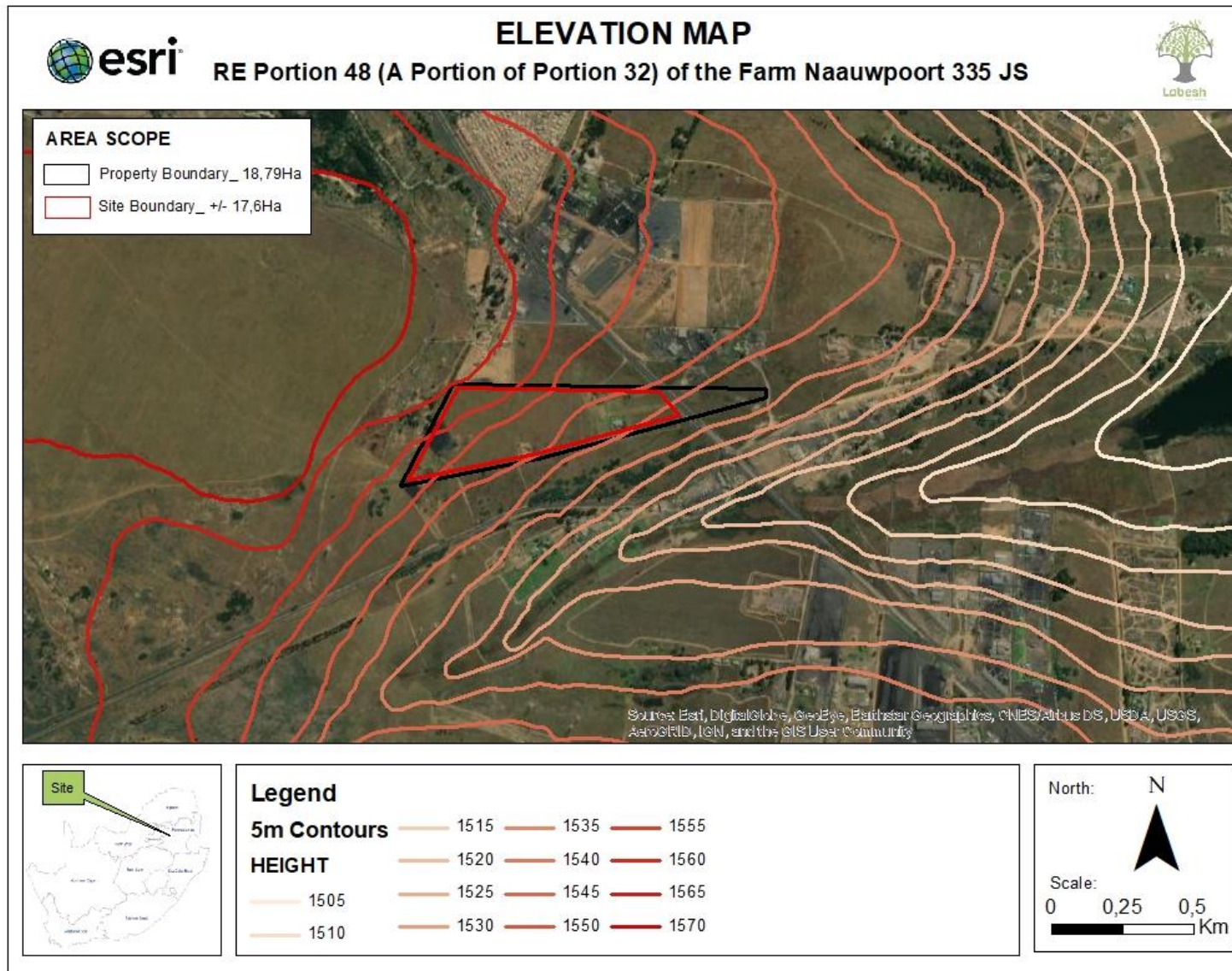
Terrestrial CBA Map of the project site



Sensitivity Map of the project site

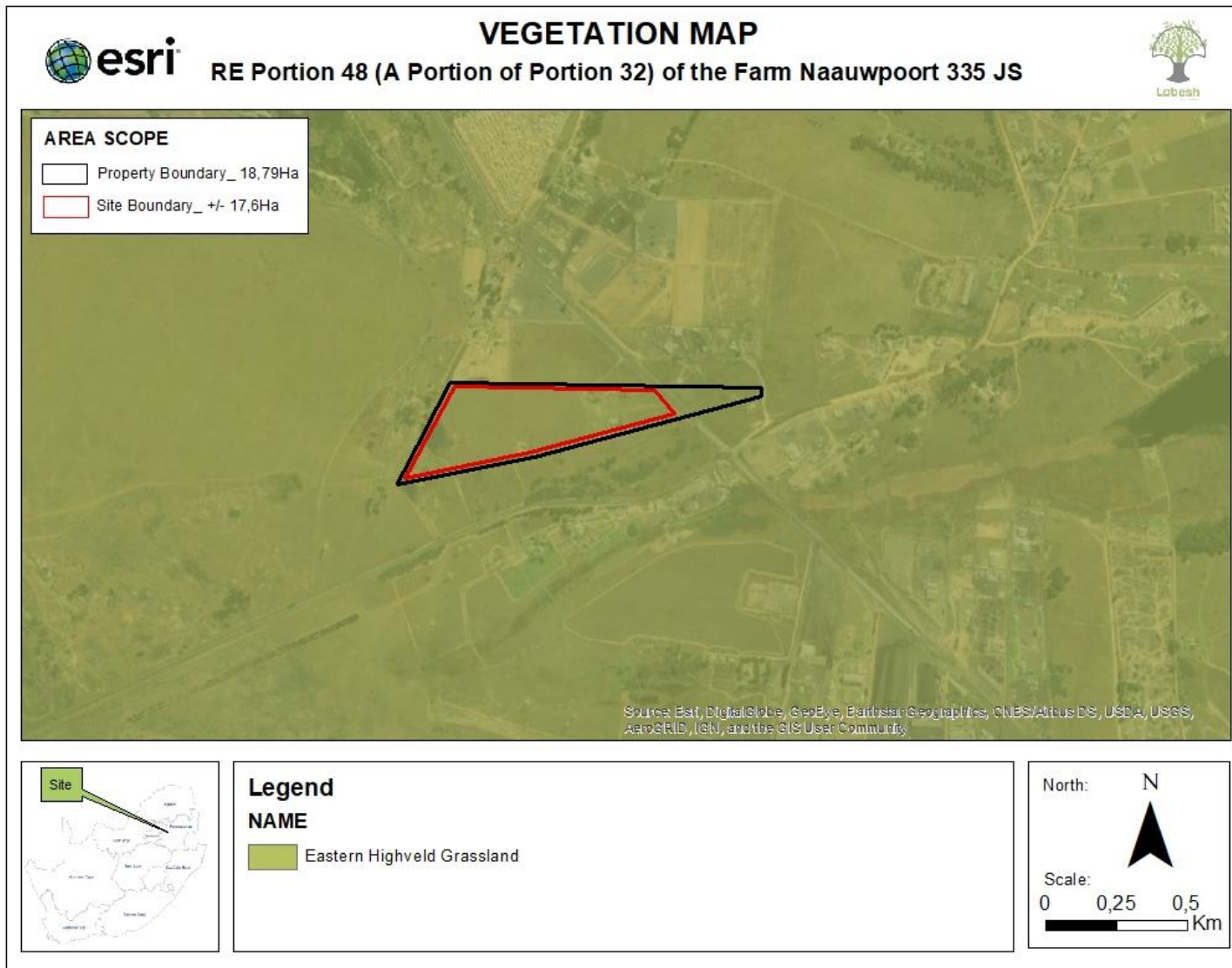


Geology Map of the project site

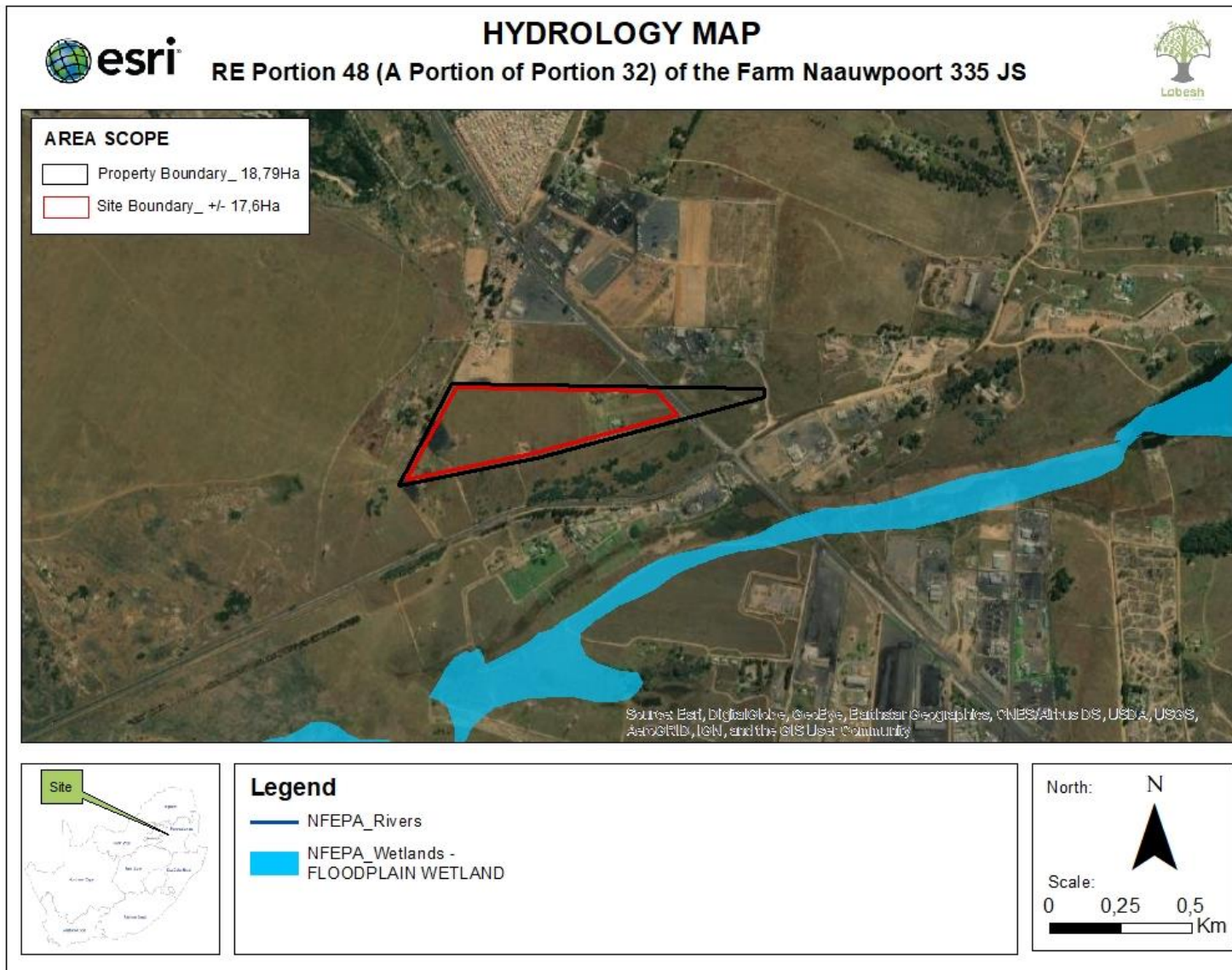


Elevation Map of the project site





Vegetation Map of the project site



Hydrology Map of the project site and surrounding area

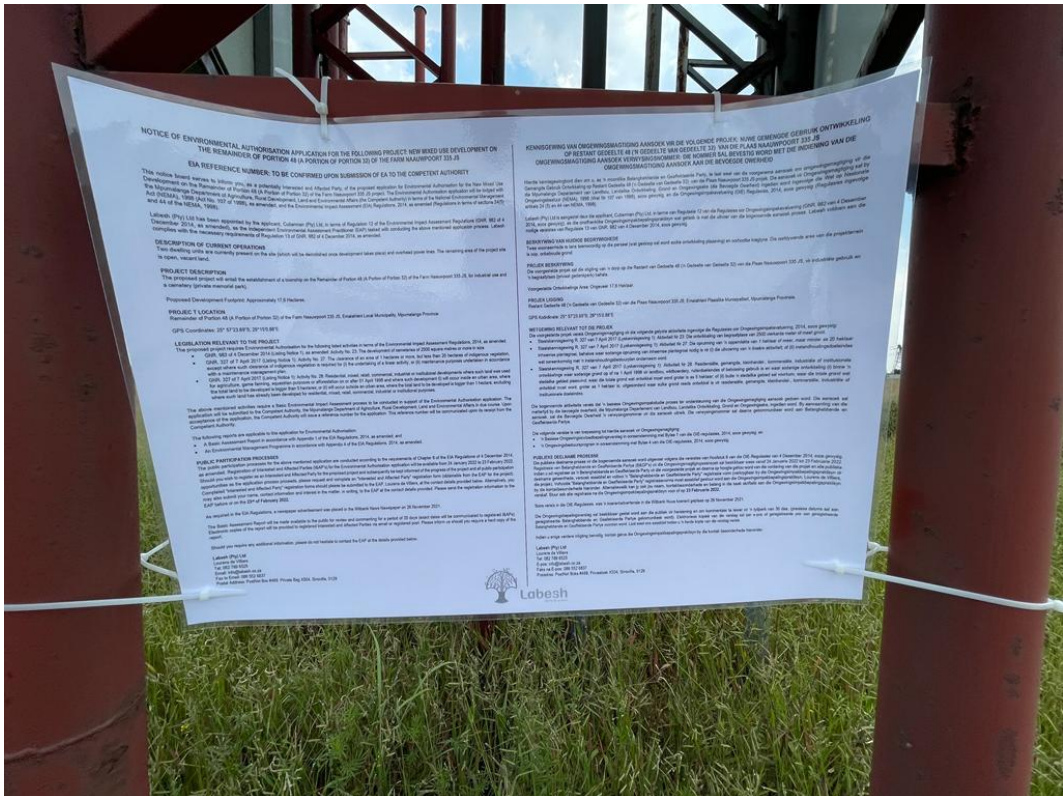
## APPENDIX B - Photographs



# APPENDIX C – Public Participation

Appendix 1: Proof of Site Notice





**NOTICE OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS**

**EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF EA TO THE COMPETENT AUTHORITY**

This notice board serves to inform you, as a potentially Interested and Affected Party, of the proposed application for Environmental Authorisation for the New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naaupoort 335 JS project. The Environmental Authorisation application will be lodged with the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (the Competent Authority) in terms of the National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (Regulations in terms of sections 24(5) and 44 of the NEMA, 1998).

Labesh (Pty) Ltd has been appointed by the applicant, Cuberman (Pty) Ltd, in terms of Regulation 12 of the Environmental Impact Assessment Regulations (GNR. 982 of 4 December 2014, as amended), as the independent Environmental Assessment Practitioner (EAP) tasked with conducting the above mentioned application process. Labesh complies with the necessary requirements of Regulation 13 of GNR. 982 of 4 December 2014, as amended.

**DESCRIPTION OF CURRENT OPERATIONS**

Two dwelling units are currently present on the site (which will be demolished once development takes place) and overhead power lines. The remaining area of the project site is open, vacant land.

**PROJECT DESCRIPTION**

The proposed project will entail the establishment of a township on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naaupoort 335 JS, for industrial use and a cemetery (private memorial park).

Proposed Development Footprint: Approximately 17,6 Hectares.

**PROJECT LOCATION**

Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naaupoort 335 JS, Emalahleni Local Municipality, Mpumalanga Province.

GPS Coordinates: 25° 57'23.69"S, 29°15'0.88"E

**LEGISLATION RELEVANT TO THE PROJECT**

The proposed project requires Environmental Authorisation for the following listed activities in terms of the Environmental Impact Assessment Regulations, 2014, as amended:

- GNR. 983 of 4 December 2014 (Listing Notice 1), as amended: Activity No. 23: The development of cemeteries of 2500 square metres or more in size.
- GNR. 327 of 7 April 2017 (Listing Notice 1): Activity No. 27: The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for (i) the undertaking of a linear activity, or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.
- GNR. 327 of 7 April 2017 (Listing Notice 1): Activity No. 28: Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare, excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.

The above mentioned activities require a Basic Environmental Impact Assessment process to be conducted in support of the Environmental Authorisation application. The application will be submitted to the Competent Authority, the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs in due course. Upon acceptance of the application, the Competent Authority will issue a reference number for the application. This reference number will be communicated upon its receipt from the Competent Authority.

The following reports are applicable to this application for Environmental Authorisation:

- A Basic Assessment Report in accordance with Appendix 1 of the EIA Regulations, 2014, as amended; and
- An Environmental Management Programme in accordance with Appendix 4 of the EIA Regulations, 2014, as amended.

**PUBLIC PARTICIPATION PROCESSES**

The public participation processes for the above mentioned application are conducted according to the requirements of Chapter 6 of the EIA Regulations of 4 December 2014, as amended. Registration of Interested and Affected Parties (I&AP's) for the Environmental Authorisation application will be available from 24 January 2022 to 23 February 2022. Should you wish to register as an Interested and Affected Party for the proposed project and subsequently be kept informed of the progress of the project and all public participation opportunities as the application process proceeds, please request and complete an "Interested and Affected Party" registration form (obtainable from the EAP for the project). Completed "Interested and Affected Party" registration forms should please be submitted to the EAP, Lourens de Villiers, at the contact details provided below. Alternatively, you may also submit your name, contact information and interest in the matter, in writing, to the EAP at the contact details provided. Please send the registration information to the EAP before or on the **23<sup>rd</sup> of February 2022**.

As required in the EIA Regulations, a newspaper advertisement was placed in the Witbank News Newspaper on 26 November 2021.

The Basic Assessment Report will be made available to the public for review and commenting for a period of 30 days (exact dates will be communicated to registered I&APs). Electronic copies of the report will be provided to registered Interested and Affected Parties via email or registered post. Please inform us should you require a hard copy of the report.

Should you require any additional information, please do not hesitate to contact the EAP at the details provided below.

**Labesh (Pty) Ltd**  
Lourens de Villiers  
Tel: 082 789 6525  
Email: info@labesh.co.za  
Fax to Email: 086 552 6837  
Postal Address: PostNet Box #469, Private Bag X504, Sinoville, 0129



**Labesh**  
ability to sustain

**KENNISGEWING VAN OMGEWINGSMAGTIGING AANSOEK VIR DIE VOLGENDE PROJEC: NUWE GEMENGDE GEBRUIK ONTWIKKELING OP RESTANT GEDEELTE 48 (N GEDEELTE VAN GEDEELTE 32) VAN DIE PLAAS NAAUWPOORT 335 JS OMGEWINGSMAGTIGING AANSOEK VERWYSINGSNUMMER: DIE NUMMER SAL BEVESTIG WORD MET DIE INDIENING VAN DIE OMGEWINGSMAGTIGING AANSOEK AAN DIE BEVOEGDE OWERHEID**

Hierdie kennisgewingbord dien om u, as 'n moontlike Belanghebbende en Geaffekteerde Party, te laat weet van die voorgenome aansoek om omgewingsmagtiging vir die Gemengde Gebruik Ontwikkeling op Restant Gedeelte 48 (n Gedeelte van Gedeelte 32) van die Plaas Naaupoort 335 JS projek. Die aansoek vir Omgewingsmagtiging sal by die Mpumalanga Departement van Landbou, Landelike Ontwikkeling, Grond en Omgewingsake (die Bevoegde Owerheid) ingedien word ingevolge die Wet op Nasionale Omgewingsbestuur (NEMA), 1998 (Wet Nr 107 van 1998), soos gewysig, en die Omgewingsimpakevaluering (OIE) Regulasies, 2014, soos gewysig (Regulasies ingevolge artikels 24 (5) en 44 van NEMA, 1998).

Labesh (Pty) Ltd is aangestel deur die applikant, Cuberman (Pty) Ltd, in terme van Regulasie 12 van die Regulasies oor Omgewingsimpakevaluering (GNR. 982 van 4 Desember 2014, soos gewysig), as die onafhanklike Omgewingsimpakevalueringpraktisyn wat getaak is met die uitvoer van die bogenoemde aansoek proses. Labesh voldoen aan die nodige vereistes van Regulasie 13 van GNR. 982 van 4 Desember 2014, soos gewysig.

**BESKRYWING VAN HUIDIGE BEDRYWEGHEDE**

Twee woonseenhede is tans teenwoordig op die perseel (wat gesloop sal word sodra ontwikkeling plaasvind) en oorhoofse kraglyne. Die oorblywende area van die projekterrein is oop, onbeboude grond.

**PROJEC BESKRYWING**

Die voorgestelde projek sal die stigting van 'n dorp op die Restant van Gedeelte 48 (n Gedeelte van Gedeelte 32) van die Plaas Naaupoort 335 JS, vir industriële gebruik en 'n begraaftaas (privaat gedenkpark) behels.

Voorgestelde Ontwikkelings Area. Ongeveer 17,6 Hektaar.

**PROJEC LIGGING**

Restant Gedeelte 48 (n Gedeelte van Gedeelte 32) van die Plaas Naaupoort 335 JS, Emalahleni Plaaslike Munisipaliteit, Mpumalanga Provinsie.

GPS Koördinate: 25° 57'23.69"S, 29°15'0.88"E

**WETGEWING RELEVANT TOT DIE PROJEC**

Die voorgestelde projek vereis Omgewingsmagtiging vir die volgende gelyste aktiwiteite ingevolge die Regulasies oor Omgewingsimpakevaluering, 2014, soos gewysig:

- Staatskennisgewing R. 327 van 7 April 2017 (Lyskennisgewing 1): Aktiwiteit Nr 23: Die ontwikkeling van begraaftaas van 2500 vierkante meter of meer groot.
- Staatskennisgewing R. 327 van 7 April 2017 (Lyskennisgewing 1): Aktiwiteit Nr 27: Die opruiming van 'n oppervlakte van 1 hektaar of meer, maar minder as 20 hektaar inheemse plantegroei, behalwe waar sodanige opruiming van inheemse plantegroei nodig is vir (i) die uitvoering van 'n lineêre aktiwiteit; of (ii) instandhoudingsdoelendeis wat ooreenkomstig met 'n instandhoudingsbestuurplan ondemeem word.
- Staatskennisgewing R. 327 van 7 April 2017 (Lyskennisgewing 1): Aktiwiteit Nr 28: Residensieel, gemengde, kleinhandel-, kommersiële, industriële of institusionele ontwikkelings waar sodanige grond op of na 1 April 1998 vir landbou, wildboerdery, ruiterdoelendeis of bebossing gebruik is en waar sodanige ontwikkeling (i) binne 'n stedelike gebied plaasvind, waar die totale grond wat ontwikkel moet word groter is as 5 hektaar; of (ii) buite 'n stedelike gebied sal voorkom, waar die totale grond wat ontwikkel moet word, groter as 1 hektaar is; uitgesonderd waar sulke grond reeds ontwikkel is vir residensieel, gemengde, kleinhandel-, kommersiële, industriële of institusionele doeleindes.

Die bogenoemde aktiwiteite vereis dat 'n basiese Omgewingsimpakstudie proses ter ondersteuning van die Omgewingsmagtiging aansoek gedoen word. Die aansoek sal mettertyd by die bevoegde owerheid, die Mpumalanga Departement van Landbou, Landelike Ontwikkeling, Grond en Omgewingsake, ingedien word. By aanvaarding van die aansoek, sal die Bevoegde Owerheid 'n verwysingsnommer vir die aansoek uitreik. Die verwysingsnommer sal daarna gekommunikeer word aan Belanghebbende en Geaffekteerde Partye.

Die volgende verslae is van toepassing tot hierdie aansoek vir Omgewingsmagtiging:

- 'n Basiese Omgewingsimpakevalueringverslag in ooreenstemming met Bylae 1 van die OIE-regulasies, 2014, soos gewysig; en
- 'n Omgewingsbestuursprogram in ooreenstemming met Bylae 4 van die OIE-regulasies, 2014, soos gewysig.

**PUBLIEKE DEELNAME PROSESSE**

Die publieke deelname proses vir die bogenoemde aansoek word uitgevoer volgens die vereistes van Hoofstuk 6 van die OIE-Regulasies van 4 Desember 2014, soos gewysig. Registrasie van Belanghebbende en Geaffekteerde Partye (B&GPs) vir die Omgewingsmagtigingsaansoek sal beskikbaar wees vanaf 24 Januarie 2022 tot 23 Februarie 2022. Indien u wil registreer as 'n Belanghebbende en Geaffekteerde Party vir die voorgestelde projek en daarna op hoogte gehou word van die vordering van die projek en alle publieke deelname geleenthede, versoek asseblief en voltooi 'n "Belanghebbende en Geaffekteerde Party" registrasie vorm (verkrygbaar by die Omgewingsimpakevalueringpraktisyn vir die projek). Voltooi "Belanghebbende en Geaffekteerde Party" registrasievorms moet asseblief gestuur word aan die Omgewingsimpakevalueringpraktisyn, Lourens de Villiers, by die kontakbesonderhede hieronder. Alternatiewelik kan jy ook jou naam, kontakbesonderhede en belang in die saak skriftelik aan die Omgewingsimpakevalueringpraktisyn verskaf. Stuur asb alle registrasie na die Omgewingsimpakevalueringpraktisyn voor of op **23 Februarie 2022**.

Soos vereis in die OIE-Regulasies, was 'n koerantadvertensie in die Witbank Nuus koerant geplaas op 26 November 2021.

Die Omgewingsimpakevalueringverslag sal beskikbaar gestel word aan die publiek vir hersiening en om kommentaar te lewer vir 'n tydperk van 30 dae, (presiese datums sal aan geregistreerde Belanghebbende en Geaffekteerde Partye gekommunikeer word). Elektroniese kopieë van die verslag sal per e-pos of geregistreerde pos aan geregistreerde Belanghebbende en Geaffekteerde Partye voorsien word. Laat weet ons asseblief indien u 'n harde kopie van die verslag vereis.

Indien u enige verdere inligting benodig, kontak gerus die Omgewingsimpakevalueringpraktisyn by die kontak besonderhede hieronder.

**Labesh (Pty) Ltd**  
Lourens de Villiers  
Tel: 082 789 6525  
E-pos: info@labesh.co.za  
Faks na E-pos: 086 552 6837  
Posadres: PostNet Boks #469, Privaatsak X504, Sinoville, 0129

## Appendix 2: Written notices issued as required in terms of the regulations

### Appendix 2.1 – Written Notices



Postnet Box 469, Private Bag X504, Sinoville, 0129  
Tell: 087 230 8462  
Cell: 082 789 6525  
Email: info@labesh.co.za

November 26, 2021

Department of Agriculture, Rural Development and Land Administration  
Private Bag X11219  
Nelspruit  
1200

Attention: Mr. C Kleynhans

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

This letter serves to inform you, as a potential Interested and Affected Party, of the application for Environmental Authorisation for the proposed Mixed Used Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS project. The Environmental Authorisation (EA) application will be lodged with the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (the Competent Authority [CA]) in terms of the National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment Regulations, 2014 (Regulations in terms of sections 24(5) and 44 of the NEMA, 1998), as amended. For this Environmental Authorisation application, a Basic Environmental Impact Assessment process will be conducted.

The following table provides a brief summary of the project details. A Background Information Document (BID) is attached to this notification letter and contains more detail regarding the proposed project. Please also find attached an "Interested and Affected Party" registration form. This form should please be completed should you wish to register as an Interested and Affected Party for the proposed project and subsequently be kept informed of the progress of the project and all public participation opportunities as the application process proceeds. Completed "Interested and Affected Party" registration forms should please be submitted to the Environmental Assessment Practitioner (EAP) for the project, Lourens de Villiers, at the contact details provided below. Alternatively, you may also submit your name, contact information and interest in the matter, in writing, to the EAP at the contact details provided. Please send the registration information to the EAP before or on the 17<sup>th</sup> of January 2022.

<b>Project Applicant</b>	Cuberman (Pty) Ltd
<b>Project EIA Reference Number</b>	To be confirmed upon submission of the EA to the CA
<b>Project Name</b>	New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS
<b>Project Location</b>	Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS
<b>Project GPS Coordinates</b>	25° 57'23.69"S; 29°15'0.88"E
<b>Environmental Assessment Practitioner for the project</b>	Labesh (Pty) Ltd - Lourens de Villiers Tel: 082 789 6525 Email: info@labesh.co.za Fax to Email: 086 552 6837 Postal Address: PostNet Box #469, Private Bag X504, Sinoville, 0129

Labesh (Pty) Ltd.



Postnet Box 469, Private Bag X504, Sinoville, 0129  
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Cell: 082 789 6525  
Email: info@labesh.co.za

Please do not hesitate to contact me should you require any additional information or if any of the information provided in this letter is unclear.

Regards,

Lourens de Villiers  
Managing Director and Environmental Assessment Practitioner





Postnet Box 469, Private Bag X504, Sinoville, 0129  
 Tell: 087 230 8462  
 Cell: 082 789 6525  
 Email: info@labesh.co.za

November 26, 2021

Department of Agriculture, Rural Development and Land Administration  
 Private Bag X11219  
 Nelspruit  
 1200

Attention: Mr. J Venter

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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<b>Project Applicant</b>	Cuberman (Pty) Ltd
<b>Project EIA Reference Number</b>	To be confirmed upon submission of the EA to the CA
<b>Project Name</b>	New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS
<b>Project Location</b>	Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS
<b>Project GPS Coordinates</b>	25° 57'23.69"S; 29° 15'0.88"E
<b>Environmental Assessment Practitioner for the project</b>	Labesh (Pty) Ltd - Lourens de Villiers Tel: 082 789 6525 Email: info@labesh.co.za Fax to Email: 086 552 6837 Postal Address: PostNet Box #469, Private Bag X504, Sinoville, 0129

Labesh (Pty) Ltd.



Postnet Box 469, Private Bag X504, Sinoville, 0129  
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 Email: info@labesh.co.za

November 26, 2021

Department of Community Safety, Security and Liaison  
 Private Bag X11269  
 Nelspruit  
 1200

Attention: Mr. W Mthombothi

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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Labesh (Pty) Ltd.



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November 26, 2021

Department of Co-operative Governance and Traditional Affairs  
 Private Bag X11304  
 Nelspruit  
 1200

Attention: Mr. B Ntiwane

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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Labesh (Pty) Ltd.



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November 26, 2021

Department of Co-operative Governance and Traditional Affairs  
 Private Bag X11304  
 Nelspruit  
 1200

Attention: Ms. M Lushaba

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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<b>Environmental Assessment Practitioner for the project</b>	Labesh (Pty) Ltd - Lourens de Villiers Tel: 082 789 6525 Email: info@labesh.co.za Fax to Email: 086 552 6837 Postal Address: PostNet Box #469, Private Bag X504, Sinoville, 0129

Labesh (Pty) Ltd.



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November 26, 2021

Department of Culture, Sport and Recreation  
 PO Box 1243  
 Nelspruit  
 1200

Attention: Dr. PM Lubisi

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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<b>Project Applicant</b>	Cuberman (Pty) Ltd
<b>Project EIA Reference Number</b>	To be confirmed upon submission of the EA to the CA
<b>Project Name</b>	New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS
<b>Project Location</b>	Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS
<b>Project GPS Coordinates</b>	25° 57'23.69"S; 29° 15'0.88"E
<b>Environmental Assessment Practitioner for the project</b>	Labesh (Pty) Ltd - Lourens de Villiers Tel: 082 789 6525 Email: info@labesh.co.za Fax to Email: 086 552 6837 Postal Address: PostNet Box #469, Private Bag X504, Sinoville, 0129

Labesh (Pty) Ltd.



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November 26, 2021

Department of Finance  
 Private Bag X11205  
 Nelspruit  
 1200

Attention: Ms. N Nkamba

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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November 26, 2021

Department of Finance  
 Private Bag X11205  
 Nelspruit  
 1200

Attention: Ms. E Chego

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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November 26, 2021

Department of Health  
 Private Bag X11285  
 Nelspruit  
 1200

Attention: Mrs. C Swart

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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November 26, 2021

Department of Health  
 Private Bag X11285  
 Nelspruit  
 1200

Attention: Mr. P Makhubela

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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Labesh (Pty) Ltd.



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November 26, 2021

Department of Human Settlements  
 Private Bag X11328  
 Nelspruit  
 1200

Attention: Mr. D Dube

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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November 26, 2021

Department of Human Settlements  
 Private Bag X11328  
 Nelspruit  
 1200

Attention: Mr. S Mstweni

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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November 26, 2021

Department of Mineral Resources  
 Private Bag X7279  
 Emalahleni  
 1035

Attention: Mr. A Tshivhandekano

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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Labesh (Pty) Ltd.



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November 26, 2021

Department of Public Works, Roads and Transport  
 Private Bag X11310  
 Nelspruit  
 1200

Attention: Mr. K Mohlasedi

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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November 26, 2021

Department of Social Development  
 Private Bag X11285  
 Nelspruit  
 1200

Attention: Ms. N Mlageni

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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<b>Project GPS Coordinates</b>	25° 57'23.69"S; 29° 15'0.88"E
<b>Environmental Assessment Practitioner for the project</b>	Labesh (Pty) Ltd - Lourens de Villiers Tel: 082 789 6525 Email: info@labesh.co.za Fax to Email: 086 552 6837 Postal Address: PostNet Box #469, Private Bag X504, Sinoville, 0129

Labesh (Pty) Ltd.



Postnet Box 469, Private Bag X504, Sinoville, 0129  
 Tell: 087 230 8462  
 Cell: 082 789 6525  
 Email: info@labesh.co.za

November 26, 2021

Department of Water and Sanitation  
 Private Bag X10580  
 Bronkhorstpruit  
 1020

Attention: Ms. B Mnguni

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

This letter serves to inform you, as a potential Interested and Affected Party, of the application for Environmental Authorisation for the proposed Mixed Used Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS project. The Environmental Authorisation (EA) application will be lodged with the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (the Competent Authority [CA]) in terms of the National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment Regulations, 2014 (Regulations in terms of sections 24(5) and 44 of the NEMA, 1998), as amended. For this Environmental Authorisation application, a Basic Environmental Impact Assessment process will be conducted.

The following table provides a brief summary of the project details. A Background Information Document (BID) is attached to this notification letter and contains more detail regarding the proposed project. Please also find attached an "Interested and Affected Party" registration form. This form should please be completed should you wish to register as an Interested and Affected Party for the proposed project and subsequently be kept informed of the progress of the project and all public participation opportunities as the application process proceeds. Completed "Interested and Affected Party" registration forms should please be submitted to the Environmental Assessment Practitioner (EAP) for the project, Lourens de Villiers, at the contact details provided below. Alternatively, you may also submit your name, contact information and interest in the matter, in writing, to the EAP at the contact details provided. Please send the registration information to the EAP before or on the **17<sup>th</sup> of January 2022**.

<b>Project Applicant</b>	Cuberman (Pty) Ltd
<b>Project EIA Reference Number</b>	To be confirmed upon submission of the EA to the CA
<b>Project Name</b>	New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS
<b>Project Location</b>	Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS
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Labesh (Pty) Ltd.



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 Cell: 082 789 6525  
 Email: info@labesh.co.za

November 26, 2021

Emalahleni Local Municipality  
 PO Box 3  
 Emalahleni  
 1035

Attention: Municipal Manager

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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Labesh (Pty) Ltd.





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 Cell: 082 789 6525  
 Email: info@labesh.co.za

November 26, 2021

Nkangala District Municipality  
 PO Box 437  
 Middelburg  
 1050

Attention: Municipal Manager

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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Labesh (Pty) Ltd.



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November 26, 2021

Nkangala District Municipality  
 PO Box 437  
 Middelburg  
 1050

Attention: Mr. V Mahlangu

**NOTIFICATION OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF ENVIRONMENTAL APPLICATION TO THE COMPETENT AURHORITY**

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<b>Project Applicant</b>	Cuberman (Pty) Ltd
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Labesh (Pty) Ltd.

MyDashboard | SAHRA    Mixed Use Development in Emalahleni

sahris.sahra.org.za/cases/mixed-use-development-emalahleni

 Heritage Cases *Mixed Use Development in Emalahleni* has been created.

 Heritage Cases

VIEW    EDIT

**SAHRA Application Closure**

Please note the following concerning applications submitted to the South African Heritage Resources Agency (SAHRA) during the December 2021 to January 2022 period.

The full notice is available here: [Notice](#)

**Mixed Use Development in Emalahleni**

[Add new comment](#)    [Subscribe to: This post](#)

**CaseHeader**    **LocationInfo**    **Admin**    **Images**

**Status:** DRAFT

**HeritageAuthority(s):** MPHRA

**Case Type:** Section 38 (1) - Decision from Heritage Authority required

**Development Type:** Mixed-Use

**ProposalDescription:**  
Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS for Industrial Use and a Cemetery.

**ApplicationDate:** Thursday, December 2, 2021 - 14:14


**CaseID:** 17676



**Applicants:** Cuberman (Pty) Ltd


**Consultants/Experts:** Lourens de Villiers

**OtherReferences:**

**CasImages**



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Chat (10)

Type here to search

25°C Cloudy    14:15    2021/12/02

**BACKGROUND INFORMATION DOCUMENT – ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS. EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF THE ENVIRONMENTAL APPLICATION TO THE COMPETENT AUTHORITY**

This Background Information Document (BID) serves to inform you, as a potential Interested and Affected Party (I&AP), of the application for Environmental Authorisation for the proposed Mixed Used Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS project. The Environmental Authorisation application will be lodged with the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (the Competent Authority [CA]) in terms of the National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment (EIA) Regulations, 2014 (Regulations in terms of Sections 24(5) and 44 of the NEMA, 1998), as amended.

Labesh (Pty) Ltd has been appointed by the applicant, Cuberman (Pty) Ltd, in terms of Regulation 12 of the Environmental Impact Assessment Regulations (GNR. 982 of 4 December 2014), as amended, as the independent Environmental Assessment Practitioner (EAP) tasked with conducting the abovementioned application processes. Labesh complies with the necessary requirements of Regulation 13 of GNR. 982 of 4 December 2014 as amended.

**DESCRIPTION OF CURRENT OPERATIONS**

Two dwelling units are currently present on the site (which will be demolished once development takes place) and overhead power lines. The remaining area of the project site is open, vacant land.

**PROJECT DESCRIPTION**

The proposed project will entail the establishment of a township on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS, for industrial use and a cemetery (private memorial park).

Proposed Development Footprint: Approximately 17,6 Hectares

**PROJECT LOCATION**

GPS Coordinates: 25° 57'23.69"S; 29°15'0.88"E. Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS, Emalahleni Local Municipality, Mpumalanga Province.

**LEGISLATION RELEVANT TO THE PROJECT**

The proposed project requires Environmental Authorisation for the following listed activities in terms of the Environmental Impact Assessment Regulations, 2014, as amended:

- GNR. 983 of 4 December 2014 (Listing Notice 1), as amended: Activity No. 23: The development of cemeteries of 2500 square metres or more in size.
- GNR. 983 of 4 December 2014 (Listing Notice 1), as amended: Activity No. 27: The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.
- GNR. 983 of 4 December 2014 (Listing Notice 1), as amended: Activity No. 28: Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.



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Tel: 087 230 8462  
Cell: 082 789 6525  
Email: info@labesh.co.za

The above-mentioned activities require a Basic Environmental Impact Assessment process to be conducted in support of the Environmental Authorisation application. The application will be submitted to the Competent Authority, the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs in due course. Upon acceptance of the application, the Competent Authority will issue a reference number for the application. This reference number will be communicated upon its receipt from the Competent Authority.

The following reports are applicable to this application for Environmental Authorisation:

- A Basic Assessment Report in accordance with Appendix 1 of the EIA Regulations, 2014, as amended; and
- An Environmental Management Programme in accordance with Appendix 4 of the EIA Regulations, 2014, as amended.

#### **PUBLIC PARTICIPATION PROCESSES**

The public participation processes for the above-mentioned application are conducted according to the requirements of Chapter 6 of the EIA Regulations of 4 December 2014, as amended. Registration of Interested and Affected Parties (I&AP's) for the Environmental Authorisation application will be available from 26 November 2021 to 17 January 2022. Should you wish to register as an Interested and Affected Party for the proposed project and subsequently be kept informed of the progress of the project and all public participation opportunities as the application process proceeds, please complete the "Interested and Affected Party" registration form that forms part of this BID. Completed "Interested and Affected Party" registration forms should please be submitted to the EAP for the project, Lourens de Villiers, at the contact details provided below. Alternatively, you may also submit your name, contact information and interest in the matter, in writing, to the EAP at the contact details provided. Please send the registration information to the EAP before or on the 17<sup>th</sup> of January 2022.

As required in the EIA Regulations, site notice boards will/have been placed on the project property boundary and a newspaper advertisement will be placed in the Witbank News Newspaper on the 26<sup>th</sup> of November 2021.

The Basic Assessment Report will be made available to the public for review and commenting for a period of 30 days, at a later stage during this public participation process (exact dates will be communicated to registered I&APs). Electronic copies of the report will be provided to registered Interested and Affected Parties via email or registered post. Please inform us should you require a hard copy of the report.

Should you require any additional information, please do not hesitate to contact the EAP at the details provided below.

**Labesh (Pty) Ltd** – Lourens de Villiers  
Tel: 082 789 6525  
Email: info@labesh.co.za  
Fax to Email: 086 552 6837  
Postal Address: PostNet Box #469, Private Bag X504, Sinoville, 0129

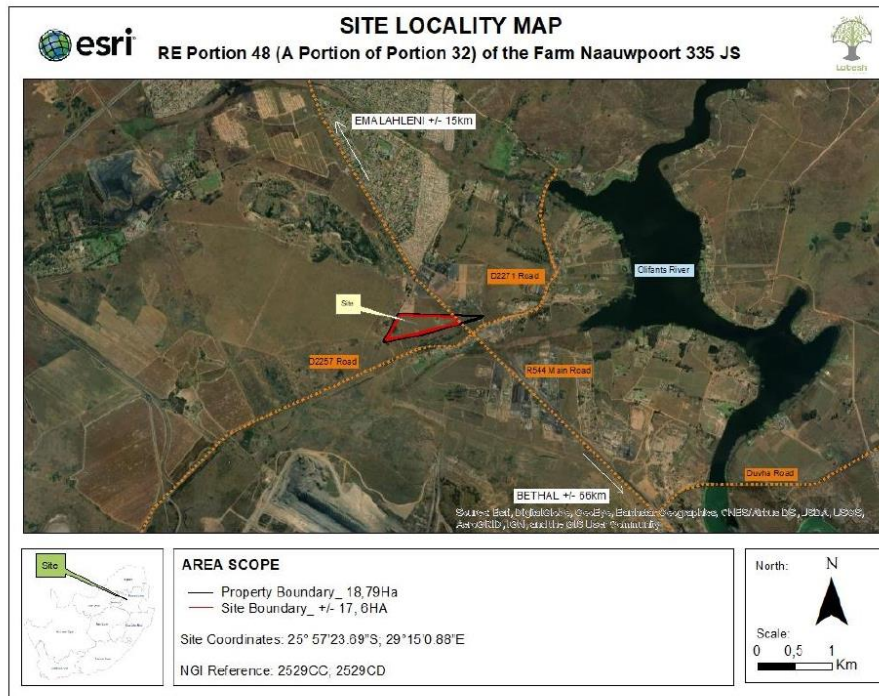


Figure 1: Site Locality Map

<b>INTERESTED AND AFFECTED PARTY REGISTRATION FORM</b>							
<b>NEW MIXED USE DEVELOPMENT ON REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF THE APPLICATION TO THE COMPETENT AUTHORITY.</b>							
TITLE							
NAME							
SURNAME							
DO YOU REPRESENT AN ORGANISATION? IF SO, PLEASE SPECIFY ORGANISATION NAME							
CELL PHONE NUMBER							
TELEPHONE NUMBER (H)							
TELEPHONE NUMBER (W)							
FAX NUMBER							
EMAIL ADDRESS							
PHYSICAL ADDRESS							
FARM NAME AND PORTION (IF APPLICABLE)							
POSTAL ADDRESS							
PREFERRED WRITTEN CONTACT METHOD		EMAIL		FAX		POST	
PREFERRED TELEPHONIC CONTACT METHOD		CELL		HOME		WORK	
ARE THERE ANY OTHER PARTIES THAT YOU FEEL SHOULD BE NOTIFIED OF THIS PROPOSED PROJECT? IF SO, PLEASE PROVIDE CONTACT DETAILS FOR SAID PARTIES							
PLEASE INDICATE WHETHER YOU HAVE ANY COMMENTS OR CONCERNS REGARDING THE PROPOSED PROJECT		YES		NO			
IF YES, PLEASE DETAIL YOUR COMMENTS IN THE SECTION PROVIDED BELOW (ATTACH EXTRA PAGES IF NECESSARY)							





**BACKGROUND INFORMATION DOCUMENT – ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE FOLLOWING PROJECT: NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS. EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF THE ENVIRONMENTAL APPLICATION TO THE COMPETENT AUTHORITY**

This Background Information Document (BID) serves to inform you, as a potential Interested and Affected Party (I&AP), of the application for Environmental Authorisation for the proposed Mixed Used Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS project. The Environmental Authorisation application will be lodged with the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (the Competent Authority [CA]) in terms of the National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment (EIA) Regulations, 2014 (Regulations in terms of Sections 24(5) and 44 of the NEMA, 1998), as amended.

Labesh (Pty) Ltd has been appointed by the applicant, Cuberman (Pty) Ltd, in terms of Regulation 12 of the Environmental Impact Assessment Regulations (GNR. 982 of 4 December 2014), as amended, as the independent Environmental Assessment Practitioner (EAP) tasked with conducting the abovementioned application processes. Labesh complies with the necessary requirements of Regulation 13 of GNR. 982 of 4 December 2014 as amended.

**DESCRIPTION OF CURRENT OPERATIONS**

Two dwelling units are currently present on the site (which will be demolished once development takes place) and overhead power lines. The remaining area of the project site is open, vacant land.

**PROJECT DESCRIPTION**

The proposed project will entail the establishment of a township on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS, for industrial use and a cemetery (private memorial park).

Proposed Development Footprint: Approximately 17,6 Hectares

**PROJECT LOCATION**

GPS Coordinates: 25° 57'23.69"S; 29°15'0.88"E. Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS, Emalahleni Local Municipality, Mpumalanga Province.

**LEGISLATION RELEVANT TO THE PROJECT**

The proposed project requires Environmental Authorisation for the following listed activities in terms of the Environmental Impact Assessment Regulations, 2014, as amended:

- GNR. 983 of 4 December 2014 (Listing Notice 1), as amended: Activity No. 23: The development of cemeteries of 2500 square metres or more in size.
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- GNR. 983 of 4 December 2014 (Listing Notice 1), as amended: Activity No. 28: Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.



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The above-mentioned activities require a Basic Environmental Impact Assessment process to be conducted in support of the Environmental Authorisation application. The application will be submitted to the Competent Authority, the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs in due course. Upon acceptance of the application, the Competent Authority will issue a reference number for the application. This reference number will be communicated upon its receipt from the Competent Authority.

The following reports are applicable to this application for Environmental Authorisation:

- A Basic Assessment Report in accordance with Appendix 1 of the EIA Regulations, 2014, as amended; and
- An Environmental Management Programme in accordance with Appendix 4 of the EIA Regulations, 2014, as amended.

#### **PUBLIC PARTICIPATION PROCESSES**

The public participation processes for the above-mentioned application are conducted according to the requirements of Chapter 6 of the EIA Regulations of 4 December 2014, as amended. Registration of Interested and Affected Parties (I&AP's) for the Environmental Authorisation application will be available from 24 January 2022 to 23 February 2022. Should you wish to register as an Interested and Affected Party for the proposed project and subsequently be kept informed of the progress of the project and all public participation opportunities as the application process proceeds, please complete the "Interested and Affected Party" registration form that forms part of this BID. Completed "Interested and Affected Party" registration forms should please be submitted to the EAP for the project, Lourens de Villiers, at the contact details provided below. Alternatively, you may also submit your name, contact information and interest in the matter, in writing, to the EAP at the contact details provided. Please send the registration information to the EAP before or on the **23<sup>rd</sup> of February 2022**.

As required in the EIA Regulations, site notice boards have been placed on the project property boundary and a newspaper advertisement was placed in the Witbank News Newspaper on the 26<sup>th</sup> of November 2021.

The Basic Assessment Report will be made available to the public for review and commenting for a period of 30 days, at a later stage during this public participation process (exact dates will be communicated to registered I&APs). Electronic copies of the report will be provided to registered Interested and Affected Parties via email or registered post. Please inform us should you require a hard copy of the report.

Should you require any additional information, please do not hesitate to contact the EAP at the details provided below.

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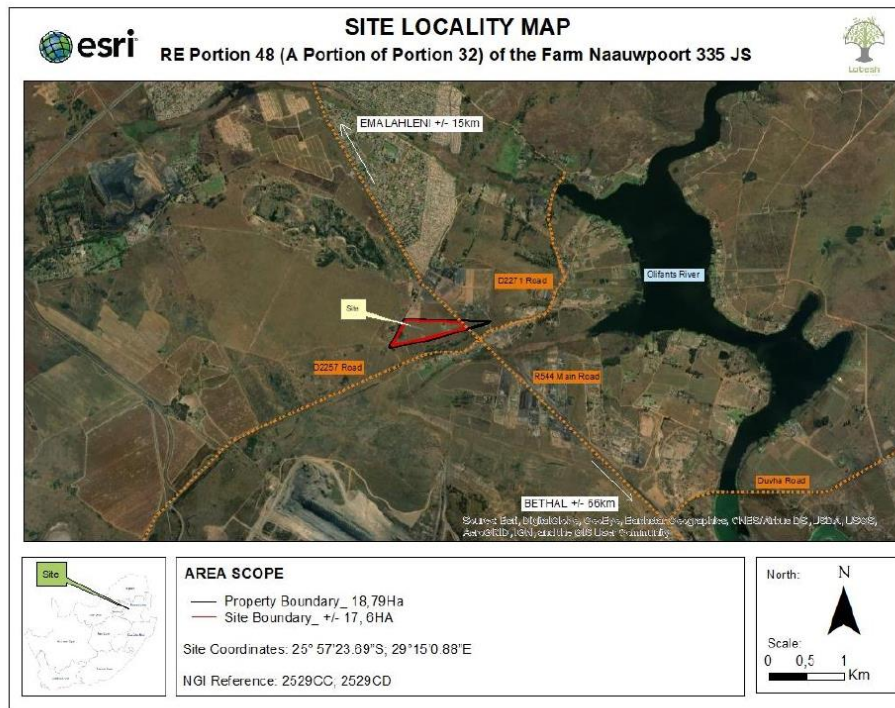


Figure 1: Site Locality Map



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<b>INTERESTED AND AFFECTED PARTY REGISTRATION FORM</b>							
<b>NEW MIXED USE DEVELOPMENT ON REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS; EIA REFERENCE NUMBER: TO BE CONFIRMED UPON SUBMISSION OF THE APPLICATION TO THE COMPETENT AUTHORITY.</b>							
TITLE							
NAME							
SURNAME							
DO YOU REPRESENT AN ORGANISATION? IF SO, PLEASE SPECIFY ORGANISATION NAME							
CELL PHONE NUMBER							
TELEPHONE NUMBER (H)							
TELEPHONE NUMBER (W)							
FAX NUMBER							
EMAIL ADDRESS							
PHYSICAL ADDRESS							
FARM NAME AND PORTION (IF APPLICABLE)							
POSTAL ADDRESS							
PREFERRED WRITTEN CONTACT METHOD		EMAIL		FAX		POST	
PREFERRED TELEPHONIC CONTACT METHOD		CELL		HOME		WORK	
ARE THERE ANY OTHER PARTIES THAT YOU FEEL SHOULD BE NOTIFIED OF THIS PROPOSED PROJECT? IF SO, PLEASE PROVIDE CONTACT DETAILS FOR SAID PARTIES							
PLEASE INDICATE WHETHER YOU HAVE ANY COMMENTS OR CONCERNS REGARDING THE PROPOSED PROJECT		YES		NO			
IF YES, PLEASE DETAIL YOUR COMMENTS IN THE SECTION PROVIDED BELOW (ATTACH EXTRA PAGES IF NECESSARY)							



## Appendix 2.2 – Written Notices – Emailed

### Info

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:13  
**To:** 'Tiaan Kleynhans'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** BID\_REPtn48Naauwpoort.pdf; Department of Agriculture, Rural Development and Land Administration.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

Postnet Box 469  
 Private Bag X504  
 Sinoville 0129

**Labesh**  
sustainable, natural resource management



### Info

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:14  
**To:** 'jventer@mpg.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** Department of Agriculture, Rural Development and Land Administration01.pdf; BID\_REPtn48Naauwpoort.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

Postnet Box 469  
 Private Bag X504  
 Sinoville 0129

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**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:09  
**To:** 'williamm@mpg.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** Department of Community Safety, Security and Liaison.pdf; BID\_REPtn48Naauwpoort.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

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 Private Bag X504  
 Sinoville 0129

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**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:15  
**To:** 'bcntiwane@mpg.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** BID\_REPtn48Naauwpoort.pdf; Department of Co-operative Governance and Traditional Affairs.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

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 Private Bag X504  
 Sinoville 0129

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**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:15  
**To:** 'mzmantashe@mpg.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** Department of Co-operative Governance and Traditional Affairs01.pdf; BID\_REPtn48Naauwpoort.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

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 Private Bag X504  
 Sinoville 0129

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**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:20  
**To:** 'PMLubisi@mpg.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** Department of Culture, Sport and Recreation.pdf; BID\_REPtn48Naauwpoort.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

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 Private Bag X504  
 Sinoville 0129

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sustainable, natural resource management





**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:21  
**To:** 'nzkamba@mpg.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** Department of Finance.pdf; BID\_REPtn48Naauwpoort.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

Postnet Box 469  
 Private Bag X504  
 Sinoville 0129

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**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:21  
**To:** 'echeego@mpg.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** Department of Finance01.pdf; BID\_REPtn48Naauwpoort.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

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 Private Bag X504  
 Sinoville 0129

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**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:16  
**To:** 'CareenS@mpuhealth.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** Department of Health.pdf; BID\_REPtn48Naauwpoort.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

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 Private Bag X504  
 Sinoville 0129



**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:16  
**To:** 'Pauleck Makhubela'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** BID\_REPtn48Naauwpoort.pdf; Department of Health01.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

Postnet Box 469  
 Private Bag X504  
 Sinoville 0129



**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:19  
**To:** 'APohl@mpg.gov.za'; 'ntzulu@mpg.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** Department of Human Settlements.pdf; BID\_REPtn48Naauwpoort.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

Postnet Box 469  
 Private Bag X504  
 Sinoville 0129

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**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:19  
**To:** 'APohl@mpg.gov.za'; 'ntzulu@mpg.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** BID\_REPtn48Naauwpoort.pdf; Department of Human Settlements01.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

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 Private Bag X504  
 Sinoville 0129

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**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:22  
**To:** 'Aubrey.Tshivhandekano@dmr.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** Department of Mineral Resources.pdf; BID\_REPtn48Naauwpoort.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

Postnet Box 469  
 Private Bag X504  
 Sinoville 0129

**Labesh**



**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Monday, 29 November 2021 08:15  
**To:** 'Lydia.Maphopha@dmr.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** BID\_REPtn48Naauwpoort.pdf; Department of Mineral Resources.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

Postnet Box 469  
 Private Bag X504  
 Sinoville 0129

**Labesh**



**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:10  
**To:** 'kmohlasedi@mpg.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** BID\_REPtn48Naauwpoort.pdf, Department of Public Works, Roads and Transport.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

Postnet Box 469  
 Private Bag X504  
 Sinoville 0129

**Labesh**



**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:17  
**To:** 'paulb@dsdmpu.gov.za'; 'HlengiweT@dsdmpu.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** Department of Social Development.pdf; BID\_REPtn48Naauwpoort.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

Postnet Box 469  
 Private Bag X504  
 Sinoville 0129

**Labesh**



**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:13  
**To:** 'Mnguni Betty (BHT)'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** Department of Water and Sanitation.pdf; BID\_REPtn48Naauwpoort.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

Postnet Box 469  
 Private Bag X504  
 Sinoville 0129

**Labesh**



**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:12  
**To:** 'officeofmm@emalahleni.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** BID\_REPtn48Naauwpoort.pdf; Emalahleni Local Municipality.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

Postnet Box 469  
 Private Bag X504  
 Sinoville 0129

**Labesh**



**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:11  
**To:** 'mm@nkangaladm.gov.za'; 'nkosinm@nkangaladm.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** Nkangala District Municipality.pdf; BID\_REPtn48Naauwpoort.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

Postnet Box 469  
 Private Bag X504  
 Sinoville 0129

**Labesh**



**Info**

---

**From:** Info <info@labesh.co.za>  
**Sent:** Friday, 26 November 2021 13:12  
**To:** 'mahlangumv@nkangaladm.gov.za'  
**Subject:** Public Participation Notification - Environmental Authorisation Application for the following project: New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS  
**Attachments:** Nkangala District Municipality01.pdf; BID\_REPtn48Naauwpoort.pdf

Good day

Please find attached a Notification Letter and Background Information Document relating to the following, for your attention please:

**Environmental Authorisation Application for the following project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS**

**EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority**

Please do not hesitate to contact us should you require further information in this regard.

Regards,

Antoinette Nieuwoudt on behalf of Lourens de Villiers (EAP for the project).

Antoinette Nieuwoudt  
 Environmental Consultant  
 Cell: 082 789 6525  
 Email: antoinette@labesh.co.za

Postnet Box 469  
 Private Bag X504  
 Sinoville 0129

**Labesh**



**NOTICE OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE PROPOSED NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS**  
**EIA REF NO.: TO BE CONFIRMED UPON SUBMISSION OF EA APPLICATION TO THE COMPETENT AUTHORITY**

This newspaper advertisement serves to inform you, as a potential Interested and Affected Party (I&AP), of the proposed application for Environmental Authorisation (EA) for the new Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS project. The EA application will be lodged with the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (Competent Authority) in terms of the National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. Labesh (Pty) Ltd has been appointed by the applicant, Cuberman (Pty) Ltd, in terms of Regulation 12 of the EIA Regulations (GNR. 982 of 4 December 2014), as amended, as the independent Environmental Assessment Practitioner (EAP) tasked with conducting the above mentioned application processes. Labesh complies with the necessary requirements of Regulation 13 of GNR. 982 of 4 December 2014, as amended.

**PROJECT DESCRIPTION:**

The proposed project will entail the establishment of a township on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS, for industrial use and a cemetery (private memorial park).

Proposed Development Footprint: Approximately 17, 6 Hectares

**PROJECT LOCATION:**

Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS, Emalahleni Local Municipality, Mpumalanga Province;  
GPS Coordinates: 25° 57'23.69"S; 29°15'0.88"E

**APPLICABLE LEGISLATION:** The proposed project requires EA for the following listed activities in terms of the EIA Regulations, 2014, as amended:

- GNR. 983 of 4 December 2014 (Listing Notice 1), as amended: Activity 23: The development of cemeteries of 2500 square metres in size.
- GNR. 983 of 4 December 2014 (Listing Notice 1), as amended: Activity 27: The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.
- GNR. 983 of 4 December 2014 (Listing Notice 1), as amended: Activity 28: Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; Excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.

**PUBLIC PARTICIPATION PROCESSES:** The public participation processes for the above mentioned applications are conducted according to the requirements of Chapter 6 of the EIA Regulations of 4 December 2014, as amended. Registration of Interested and Affected Parties (I&AP's) for the Environmental Authorisation application will be available for a period of 30 days from 26 November 2021 to 17 January 2022. Should you wish to register as an I&AP for the proposed project and be kept informed of the progress of the project and public participation opportunities, please request and complete an "Interested and Affected Party" registration form (obtainable from the EAP). Completed I&AP registration forms should please be submitted to the EAP, Lourens de Villiers, at the contact details provided below before or on the 17<sup>th</sup> of January 2022. Alternatively, you may also submit your name, contact information and interest in the matter, in writing, to the EAP at the contact details provided before or on the 17<sup>th</sup> of January 2022. As required in the EIA Regulations, site notice boards will be placed on the project property boundary. The Basic Assessment



Report will be made available to the public for review and commenting for a period of 30 days, (exact dates will be communicated to registered I&APs). Electronic copies of the report will be provided to registered I&APs via email or registered post. Please inform us should you require a hard copy of the report. Should you require any additional information, please do not hesitate to contact the EAP at the details provided below.  
**Labesh (Pty) Ltd:** Lourens de Villiers - Tel: 082 789 6525; Email: info@labesh.co.za; Fax to Email: 086 552 6837; Postal Address: PostNet Box #469, Private Bag X504, Sinoville, 0129.



## Info

---

**From:** Info <info@labesh.co.za>  
**Sent:** Tuesday, 14 December 2021 17:51  
**To:** 'van Wyk, Leonore (Thungela)'  
**Cc:** 'Netshilinganedza, Andisani (Thungela)'  
**Subject:** RE: AOPL - Registration as IAP - EA Application\_Thungela Letter to Cuberman Pty Ltd.

Good day Leonore

We hereby acknowledge receipt of your email, your registration as Interested and Affected Party (I&AP) and your comments for the following proposed project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naaupoort 335 JS; EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority, submitted to us via email on 14 December 2021.

We furthermore confirm that you have been added to the Interested and Affected Party Register for this project and that you will be notified of all future public participation opportunities, including the public review of the Draft Basic Assessment Report and draft Environmental Management Programme for this project. Your comments will be addressed and included in the reports that will in due course be finalised and provided to you for review and commenting.

Regards

Antoinette Nieuwoudt on behalf of Lourens De Villiers (EAP for the project)

Antoinette Nieuwoudt  
Environmental Consultant  
Cell: 082 789 6525  
Email: antoinette@labesh.co.za

Postnet Box 469  
Private Bag X504  
Sinoville 0129

Labesh



---

**From:** van Wyk, Leonore (Thungela) <leonore.vanwyk@thungela.com>  
**Sent:** Tuesday, 14 December 2021 16:37  
**To:** info@labesh.co.za  
**Cc:** Netshilinganedza, Andisani (Thungela) <andisani.netshilinganedza@thungela.com>  
**Subject:** AOPL - Registration as IAP - EA Application\_Thungela Letter to Cuberman Pty Ltd.

Good day,

Please find attached herewith our formal registration as an I & AP.

Kindly note that your application partially overlaps with our long existing mining right.

We are comfortable to further discuss this matter within the prescribed consultation process.

Regards

**Leonore van Wyk**  
Head of Mineral, Property Rights and Permitting



C +27 (0)76 822 0399  
[leonore.vanwyk@thungela.com](mailto:leonore.vanwyk@thungela.com)

[www.thungela.com](http://www.thungela.com)

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**CORPORATE OFFICE**  
25 Bath Avenue  
Rosebank  
2196  
South Africa

CONFIDENTIAL

**Our Reference: Register as an Interested and Affected Party/AOPL**  
**Your Reference: To Be Confirmed Upon Submission of EA Application to the Competent Authority**

**Applicant: Cuberman (Pty) Ltd**

**For Attention: Lourens de Villiers**  
**Labesh (Pty) Ltd**  
**Postnet Box 469**  
**Private Bag X504**  
**Gauteng**  
**0129**

**Email: [info@labesh.co.za](mailto:info@labesh.co.za)**

**Date: 13 December 2021**

Dear Sir/Madam

**NOTICE OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE PROPOSED NEW MIXED-USE DEVELOPMENT ON THE REMAINDER OF PORTION 48/32 OF THE FARM NAAUWPOORT 335 JS.**

1. We refer to the abovementioned notice for a proposed establishment of a township for industrial use and a cemetery (private memorial park) on the Remainder of Portion 48/32 ("RE/48/32") of the Farm Naauwpoort 335 JS. See Annexure 1 for the Notice.
2. Anglo Operations (Pty) Ltd ("AOPL") is the holder of the Khwezela Kleinkopje ("Bokgoni") mining right with Department of Mineral Resources and Energy ("DMRE") reference number MP 30/5/1/2/2/307 MR over a portion of portion RE/48/32 of the Farm Naauwpoort 335 JS, and therefore the application overlaps with our long existing mining right. See Annexure 2 for the overlapping map.
3. In accordance with paragraph 2, AOPL hereby formally register as an Interested and Affected Party ("I&AP") and further requests Cuberman (Pty) Ltd ("Cuberman") to refrain from the EA application submission as a portion of the application area overlaps with AOPL's existing mining right.

A member of the Thungela Resources Limited group  
Anglo Operations Proprietary Limited  
Incorporated in the Republic of South Africa. Registration Number 1921/006730/07  
Registered Address: 25 Bath Avenue, Rosebank, 2196. PO Box 1521, Saxonwold, 2132  
E [info@thungela.com](mailto:info@thungela.com) | [www.thungela.com](http://www.thungela.com) |

El

Should you require further information to the above, please contact our Ms. Leonore van Wyk at 076 822 0399 or at [Leonore.vanwyk@thungela.com](mailto:Leonore.vanwyk@thungela.com). Yours sincerely

*Leonore van Wyk*

**Leonore van Wyk**  
Head of Mineral, Property Rights and Permitting  
C: +27 (0)76 822 0399  
E: [leonore.vanwyk@thungela.com](mailto:leonore.vanwyk@thungela.com)  
[www.thungela.com](http://www.thungela.com)

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**ANNEXURE 1: NOTICE**

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 26/11/2021  
 Notice  
 Page 21

**NOTICE OF ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE PROPOSED NEW MIXED USE DEVELOPMENT ON THE REMAINDER OF PORTION 48 (A PORTION OF PORTION 32) OF THE FARM NAAUWPOORT 335 JS EIA REF NO.: TO BE CONFIRMED UPON SUBMISSION OF EA APPLICATION TO THE COMPETENT AUTHORITY**

This newspaper advertisement serves to inform you, as a potential Interested and Affected Party (I&AP), of the proposed application for Environmental Authorisation (EA) for the new Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS project. The EA application will be lodged with the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (Competent Authority) in terms of the National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. Labesh (Pty) Ltd has been appointed by the applicant, Cuberman (Pty) Ltd, in terms of Regulation 12 of the EIA Regulations (GNR. 982 of 4 December 2014), as amended, as the independent Environmental Assessment Practitioner (EAP) tasked with conducting the above mentioned application processes. Labesh complies with the necessary requirements of Regulation 13 of GNR. 982 of 4 December 2014, as amended.

**PROJECT****DESCRIPTION:**

The proposed project will entail the establishment of a township on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS, for industrial use and a cemetery (private memorial park). Proposed Development Footprint: Approximately 17, 6 Hectares

**PROJECT LOCATION:**

Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS, eMalahleni Local Municipality, Mpumalanga Province;

**GPS Co-ordinates:**

25°57'23.69" S;

29°15'0.88" E

**APPLICABLE LEGISLATION:**

The proposed project requires EA for the following listed activities in terms of the EIA Regulations, 2014, as

**amended:**

• GNR. 983 of 4 December 2014 (Listing Notice 1), as amended: Activity 23: The development of cemeteries of 2500 square metres in size.

• GNR. 983 of 4 December 2014 (Listing Notice 1), as amended: Activity 27: The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.

• GNR. 983 of 4 December 2014 (Listing Notice 1), as amended: Activity 28:

Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; Excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.

**PUBLIC PARTICIPATION PROCESSES:**

The public participation processes for the above mentioned applications are conducted according to the requirements of Chapter 6 of the EIA Regulations of 4 December 2014, as amended. Registration of Interested and Affected Parties (I&AP's) for the Environmental

Authorisation application will be available for a period of 30 days from 26 November 2021 to 17 January 2022. Should you wish to register as an I&AP for the proposed project and be kept informed of the progress of the project and public participation opportunities, please request and complete an "Interested and Affected Party" registration form (obtainable from the EAP). Completed I&AP registration forms should please be submitted to the EAP, Lourens de Villiers, at the contact details provided below before or on the 17<sup>th</sup> of January 2022. Alternatively, you may also submit your name, contact information and interest in the matter, in writing, to the EAP at the contact details provided before or on the 17<sup>th</sup> of January 2022. As required in the EIA Regulations, site notice boards will be placed on the project property boundary. The Basic Assessment Report will be made available to the public for review and commenting for a period of 30 days. (exact dates will be communicated to registered I&APs). Electronic copies of the report will be provided to registered I&APs via email or registered post. Please inform us should you require a hard copy of the report.

Should you require any additional information, please do not hesitate to contact the EAP at the details provided below.  
**Labesh (Pty) Ltd:**  
 Lourens de Villiers -  
 Tel: 082 789 6525;  
 Email:  
 info@labesh.co.za

EL

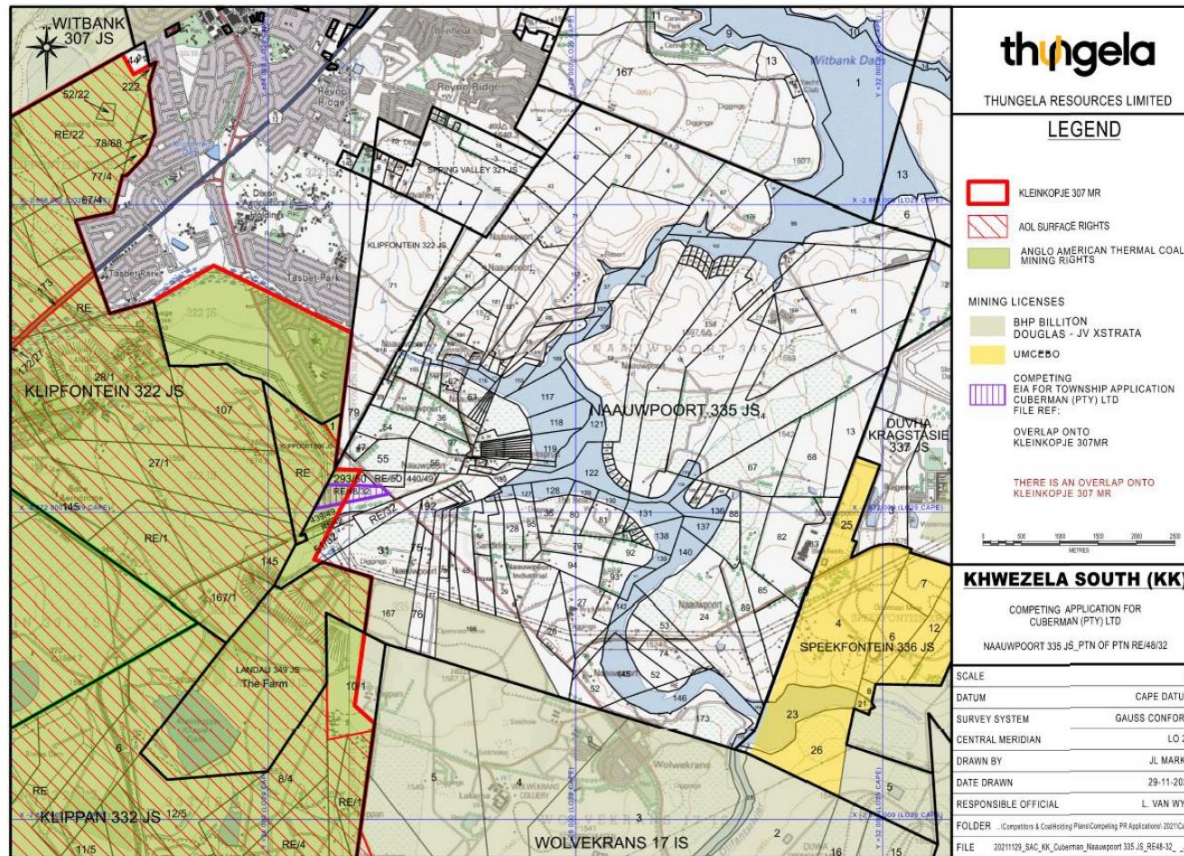


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**ANNEXURE 2: OVERLAPPING MAP**

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Appendix 5 – Minutes of any public and/or stakeholder meetings

No public or stakeholder meetings have been held.

Appendix 6 – Comments and responses report

Entity represented	Name and Surname	Date upon which comment was received	Comment submitted via	Comment(s) raised	Response to comment(s) raised
Anglo Operations (Pty) Ltd- Thungela	Leonore van Wyk	14 December 2021	Email	<p>Anglo Operations (Pty) Ltd (“AOPL”) is the holder of the Khwezela Kleinkopje (“Bokgoni”) mining right with Department of Mineral Resources and Energy (“DMRE”) reference number MP 30/5/1/2/2/307 MR over a portion of portion RE/48/32 of the Farm Naauwpoort 335 JS, and therefore the application overlaps with our long existing mining right. See Annexure 2 for the overlapping map.</p> <p>In accordance to paragraph 2, AOPL hereby formally register as an Interested and Affected Party (“I&amp;AP”) and further requests Cuberman (Pty) Ltd (“Cuberman”) to refrain from the EA application submission as a portion of the application area overlaps with AOPL’s existing mining right.</p>	<p>We hereby acknowledge receipt of your email, your registration as Interested and Affected Party (I&amp;AP) and your comments for the following proposed project: Proposed New Mixed Use Development on the Remainder of Portion 48 (A Portion of Portion 32) of the Farm Naauwpoort 335 JS; EIA Reference Number: To be confirmed upon submission of Environmental Authorisation Application to the Competent Authority, submitted to us via email on 14 December 2021.</p> <p>We furthermore confirm that you have been added to the Interested and Affected Party Register for this project and that you will be notified of all future public participation opportunities, including the public review of the Draft Basic Assessment Report and draft Environmental Management Programme for this project. Your comments will be addressed and included in the reports that will in due course be finalised and provided to you for review and commenting.</p>

Appendix 7 – Comments from I&APs on Basic Assessment (BA) Report

No comments have been received on the Basic Assessment Report.

Appendix 8 – Comments from I&APs on amendments to the BA Report

There has been no amendments to the BA Report.

Appendix 9 – Copy of the registered I&APs

Name	Farm/Association	Contact via
Ms Leonore van Wyk	Anglo Operations (Pty) Ltd- Thungela	Email: <a href="mailto:leonore.vanwyk@thungela.com">leonore.vanwyk@thungela.com</a> Cell: 076 822 0399
Cuberman (Pty) Ltd (Applicant) Mr. Eteine Bruwer	Portion 439 (A Portion of Portion 49) of the Farm Naauwpoort 335 JS	Email: <a href="mailto:bruwer.eteine@gmail.com">bruwer.eteine@gmail.com</a> Cell: 082 805 8623
	Portion 50 of the Farm Naauwpoort 335 JS	
	The Farm Klippoort 335 JS	

# APPENDIX D – Specialist Studies

The specialist studies for this project are attached to this report.



## APPENDIX E – Other Information

The Environmental Management Programme (EMP) for this project are attached to this report.



# LABESH

## ENVIRONMENTAL CONSULTANTS

### ABILITY TO SUSTAIN . . .

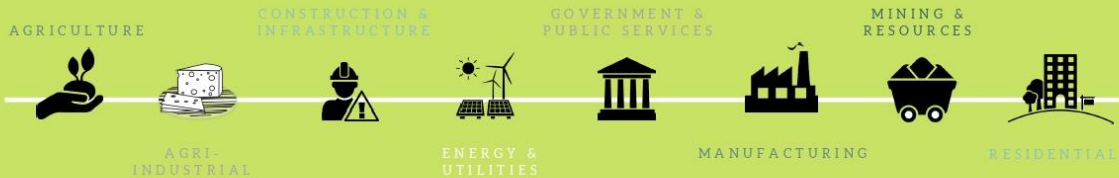
#### MISSION

Our mission at Labesh is to be a client focused company that is able and accountable and delivers a quality service on time.

#### VISION

To provide solid, scientific solutions in a socially challenged environment where the outcome is harmonious to people and the environment.

### INDUSTRIES



### SERVICES & EXPERTISE





# LABESH

ENVIRONMENTAL CONSULTANTS

MORE THAN 200 . . .

ENVIRONMENTAL  
IMPACT  
ASSESSMENTS  
(EIA'S)

WASTE LICENSES

AIR EMISSION  
LICENSES

WATER-USE  
LICENSES

RECTIFICATION  
APPLICATIONS



DIRECTOR / FOUNDER

LOURENS DE VILLIERS

B.Sc Earth Science; Hons B.Sc Geography and Environmental Studies; M.Sc Water Resource Management  
Email: [lourens@labesh.co.za](mailto:lourens@labesh.co.za) / [info@labesh.co.za](mailto:info@labesh.co.za)  
Cell: 082 789 6525



# LOURENS DE VILLIERS

DIRECTOR / FOUNDER

## PERSONAL PROFILE

I regard myself as a well renowned Environmental Assessment Practitioner with 18 years of experience in the discipline of environmental assessment and management.

I value the importance of a collective approach from various disciplines in order to establish a more sustainable outcome.

I am privileged to have a broad client base with the majority of them being personally serviced for more than 10 years.

## SKILLS & INTERESTS

- Principle Environmental Assessment Practitioner
- British Standard International ISO 14001 Lead Environmental Auditor
- International Global GAP Farm Assurer
- Plant Propagator

# RESUME

## WORK HISTORY

### Director / Founder

Labesh (Pty) Ltd, 2016 to Present

- Conducting EIA's
- Compiling EMP's for EIA's
- Conducting due diligence audits
- Conducting legal compliance audits
- Environmental management performance audits
- Natural resource optimization strategy

### Director and Partner

Shangoni Management Services (Pty) Ltd , 2011 to 2016

- Conducting EIA's
- Compiling EMP's for EIA's
- Conducting due diligence audits
- Conducting legal compliance audits
- Internal ISO 14001 audits
- External ISO 14001 certification audits

### Director

Prohibeo Environmental Management Solutions, 2004 to 2011

- Conducting EIA's
- Compiling EMP's for EIA's
- Compiling Soil and Land Capability Assessments as part of EIA's
- Conducting due diligence audits
- Conducting legal compliance audits
- Environmental management performance audits
- Natural resource optimization strategy

### Manager

Newtown Associates Environmental Services CC, 2003 to 2004

- Conducting of EMP's for mining industry
- Conducting EMP performance assessments for mining industry
- Compiling Soil and Land Capability Assessments as part of EIA's
- Conducting EIA's
- Conducting EMP's for EIA's
- Conducting due diligence audits
- Conducting legal compliance audits
- Conducting Environmental Risk Assessments

### Environmental Consultant

Helio Alliance (Pty) Ltd, 2002 to 2003

- Conducting of EMP's for mining industry
- Conducting EMP performance assessments for mining industry
- Compiling Soil and Land Capability Assessments as part of EIA's
- Conducting EIA's
- Conducting EMP's for EIA's
- Conducting due diligence audits
- Conducting legal compliance audits
- Conducting Environmental Risk Assessments



# LOURENS DE VILLIERS

DIRECTOR / FOUNDER

## GET IN TOUCH

Mobile: 082 789 6525

Email: lourens@labesh.co.za

Residential Address: Plot 24, Soutpan Road,  
Haakdoornboom, Pretoria 0200

Postal Address: Postnet Box 469, Private Bag  
X504, Sinoville, 0129

## RESUME

### ACADEMIC BACKGROUND

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#### University of Pretoria

M.Sc Water Resource Management, 2003

#### North West University

B.Sc (Hons) Geography and Environmental Studies, 1999

#### North West University

B.Sc Earth Science, 1998

### COURSES COMPLETED

---

1998 - 1999 : Prestige Leadership Development

2000 : Advanced EMS Auditing Course for Quality and Environmental Professionals

2002 : Public Presentation Skills

2010 : Implementation of Environmental Management Systems

2010 : Auditing Environmental Management Systems

2010 : Environmental Law

2014 : Waste Classification

2015 : Advanced HACCP

2015 : Train the Trainer

2016 : Transition from ISO 14001:2004 to ISO 14001: 2015 - Environmental Management Systems.

2017 & 2019: Global GAP International Farm Assurer