

**PROPOSED EXPANSION OF FOUNDERS LODGE IN LAPALALA
WILDERNESS RESERVE, LIMPOPO PROVINCE**

VISUAL IMPACT ASSESSMENT

By:



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TABLE OF CONTENTS

TABLE OF CONTENTS	ii
LIST OF MAPS	iii
1 INTRODUCTION	4
1.1 QUALIFICATION AND EXPERIENCE OF THE PROFESSIONAL TEAM.....	4
1.2 LEGAL FRAMEWORK.....	4
1.3 INFORMATION BASE	4
1.4 ASSUMPTIONS AND LIMITATIONS	5
1.5 LEVEL OF CONFIDENCE	5
2 METHODOLOGY	6
3 PROJECT DESCRIPTION	8
4 SCOPE OF WORK	8
5 THE AFFECTED ENVIRONMENT	9
5.1 GENERAL ENVIRONMENT.....	9
5.2 VISUAL QUALITY	10
6 ANTICIPATED ISSUES RELATED To VISUAL IMPACT	13
7 RESULTS.....	13
7.1 VISUAL DISTANCE AND OBSERVER PROXIMITY.....	13
7.2 POTENTIAL VISUAL EXPOSURE	14
7.3 VIEWER INCIDENCE, PERCEPTION AND SENSITIVITY	17
7.4 VISUAL ABSORPTION CAPACITY.....	17
7.5 VISUAL IMPACT INDEX.....	18
7.6 THE POTENTIAL TO MITIGATE VISUAL IMPACTS.....	21
8 CONCLUSION AND RECOMMENDATIONS.....	22
9 REFERENCES/DATA SOURCES	23

LIST OF MAPS

- Map 1:** Proposed layout of the Founders Expansion
- Map 2:** Locality map
- Map 3:** Potential visual exposure of the proposed Founders Expansion
- Map 4:** Visual Impact Index

LIST OF FIGURES

- Figure 1:** Topography of the site and surrounds
- Figure 2:** Visual quality of the region (Lapalala Wilderness Reserve)
- Figure 3:** Panoramic of the Founders Expansion Site (North to South East)
- Figure 4:** Panoramic of the Founders Expansion Site (South to North West)
- Figure 5:** High to moderate VAC of the receiving environment

LIST OF TABLES

- Table 1:** Level of Confidence

1 INTRODUCTION

1.1 QUALIFICATION AND EXPERIENCE OF THE PROFESSIONAL TEAM

NuLeaf Planning and Environmental (Pty) Ltd, specialising in Visual Impact Assessment, undertook this visual assessment.

The team undertaking the visual assessment has extensive practical knowledge in spatial analysis, environmental modelling and digital mapping, and applies this knowledge in various scientific fields and disciplines. The expertise of these practitioners is often utilised in Environmental Impact Assessments and Environmental Management Plans.

The visual assessment team is familiar with the "Guidelines for Involving Visual and Aesthetic Specialists in EIA Processes" (Provincial Government of the Western Cape: Department of Environmental Affairs and Development Planning) and utilises the principles and recommendations stated therein to undertake visual impact assessments. Although the guidelines have been developed with specific reference to the Western Cape Province of South Africa, the core elements are more widely applicable.

NuLeaf Planning and Environmental have been appointed as an independent specialist consultant to undertake the visual impact assessment. Neither the author, nor NuLeaf Planning and Environmental will benefit from the outcome of the project decision-making.

1.2 LEGAL FRAMEWORK

The following legislation and guidelines have been considered in the preparation of this report:

- The Environmental Impact Assessment Amendment Regulations, 2010;
- Guideline on Generic Terms of Reference for EAPs and Project Schedules (DEADP, Provincial Government of the Western Cape, 2011).
- Guideline for Involving Visual and Aesthetic Specialists in EIA Processes (DEADP, Provincial Government of the Western Cape, 2005).

1.3 INFORMATION BASE

This assessment was based on information from the following sources:

- Topographical maps and GIS generated data were sourced from the Surveyor General, Surveys and Mapping in Mowbray, Cape Town;
- Observations made and photographs taken during site visits;
- Conceptual layout plan;
- Professional judgement based on experience gained from similar projects; and
- Literature research on similar projects.

1.4 ASSUMPTIONS AND LIMITATIONS

This assessment was undertaken during the planning stage of the project and is based on information available at that time.

The proposed expansion will entail the construction of 6 treehouses with the inclusion of a communal dining and lounge area, as well as, a Manor House comprising of 6 rooms, lounge and dining areas, kitchen, swimming pool. The treehouses will be on raised wooden decks, while the Manor House will be constructed of brick and mortar.

Four two bedroomed staff tents will also be constructed. Electricity will be via solar panels. All associated civil infrastructure (water, electricity and waste treatment) will be included.

This Visual Impact Assessment and all associated mapping for the proposed development has been undertaken according to the worst case scenario, which is a typical 3-storey building with roof (measuring approximately 9m) for the Manor House and a typical 2-storey building with roof (measuring approximately 6m) for the Treehouses.

As the support infrastructure (i.e. roads, parking, bulk services etc) has no vertical dimension (i.e. it is located at ground level), no viewshed maps have been generated for these. It is assumed that this ground-level infrastructure will not be visible beyond the boundaries of the site.

1.5 LEVEL OF CONFIDENCE

Level of confidence¹ is determined as a function of:

- The information available, and understanding of the study area by the practitioner:
 - **3:** A high level of information is available of the study area and a thorough knowledge base could be established during site visits, surveys etc. The study area was readily accessible.
 - **2:** A moderate level of information is available of the study area and a moderate knowledge base could be established during site visits, surveys etc. Accessibility to the study area was acceptable for the level of assessment.
 - **1:** Limited information is available of the study area and a poor knowledge base could be established during site visits and/or surveys, or no site visit and/or surveys were carried out.
- The information available, understanding of the project and experience of this type of project by the practitioner:
 - **3:** A high level of information and knowledge is available of the project and the visual impact assessor is well experienced in this type of project and level of assessment.
 - **2:** A moderate level of information and knowledge is available of the project and the visual impact assessor is moderately experienced in this type of project and level of assessment.

¹ Adapted from Oberholzer (2005).

- **1:** Limited information and knowledge is available of the project and the visual impact assessor has a low experience level in this type of project and level of assessment.

These values are applied as follows:

Table 2: Level of Confidence

	Information on the project & experience of the practitioner			
Information on the study area		3	2	1
	3	9	6	3
	2	6	4	2
	1	3	2	1

*The level of confidence for this assessment is determined to be **9** and indicates that the author's confidence in the accuracy of the findings is high:*

- The information available, and understanding of the study area by the practitioner is rated as **3** and
- The information available, understanding and experience of this type of project by the practitioner is rated as **3**.

2 METHODOLOGY

The study was undertaken using Geographic Information Systems (GIS) software as a tool to generate viewshed analyses and to apply relevant spatial criteria to the proposed development. A detailed Digital Terrain Model (DTM) for the study area was created from 5m interval contours from the National Geo-spatial Information data supplied by the Department: Rural Development and Land Reform.

The approach utilised to identify potential issues related to the visual impact included the following activities:

- The creation of a detailed digital terrain model (DTM) of the potentially affected environment;
- The sourcing of relevant spatial data to develop an understanding of the existing visual character and quality of the receiving environment. This includes cadastral features, vegetation types, land use activities, topographical features, site placement, etc.;
- The identification of sensitive environments upon which the proposed development could have a potential visual impact;
- The creation of viewshed analyses from the proposed development area in order to determine the visual exposure and the topography's potential to absorb the potential visual impact. The viewshed analyses take into account the dimensions of the proposed structures.

This report (visual impact assessment) sets out to identify and quantify the possible visual impacts related to the proposed Founders extensions in Lapalala Wilderness Reserve (including related infrastructure) as well as offer potential mitigation measures, where required.

The following methodology has been followed for the assessment of visual impact²:

- **Determine potential visual exposure**

The visibility or visual exposure of any development is the point of departure for the visual impact assessment. It stands to reason that if the proposed development were not visible, no impact would occur.

Viewshed analyses of the proposed development components indicate the potential visibility.

- **Determine visual distance and observer proximity to the development**

In order to refine the visual exposure of the development on surrounding areas/receptors, the principle of reduced impact over distance is applied in order to determine the core area of visual influence.

Proximity radii are created in order to indicate the scale and viewing distance of the development and to determine the prominence thereof in relation to the environment.

The visual distance theory and the observer's proximity to the development are closely related, and especially relevant, when considered from areas with a high viewer incidence and a predominantly negative visual perception of the proposed development.

- **Determine viewer incidence, perception and sensitivity**

The number of observers and their perception of a development determine the concept of visual impact. If there are no observers, then there would be no visual impact. If the visual perception of a development is favourable to all observers, then the visual impact would be positive.

It is therefore necessary to identify areas of high viewer incidence and to classify certain areas according to the observer's visual sensitivity towards the proposed development and its related infrastructure.

It would be impossible not to generalise the viewer incidence and sensitivity to some degree, as there are many variables when trying to determine the perception of the observer; regularity of sighting, cultural background, state of mind, and purpose of sighting which would create a myriad of options.

- **Determine the visual absorption capacity**

This is the capacity of the receiving environment to absorb the potential visual impact of the proposed development. The VAC is primarily a function of the vegetation, and will be high if the vegetation is tall, dense and continuous. Conversely, low growing sparse and patchy vegetation will have a low VAC.

² This methodology is adapted from that developed by MetroGIS, and detailed in numerous Visual Impact Assessments undertaken by them (2010-2014).

The VAC would also be high where the environment can readily absorb the structure in terms of texture, colour, form and light / shade characteristics of the structure. On the other hand, the VAC for a structure contrasting markedly with one or more of the characteristics of the environment would be low.

The VAC also generally increases with distance, where discernible detail in visual characteristics of both environment and structure decreases.

The digital terrain model utilised in the calculation of the visual exposure of the development does not incorporate the potential visual absorption capacity (VAC) of the natural vegetation of the region. It is therefore necessary to determine the VAC by means of the interpretation of the vegetation cover and other landscape characteristics.

- **Determine the visual impact index**

The results of the above analyses are merged in order to determine where the areas of likely visual impact would occur. These areas are further analysed in terms of the previously mentioned issues (related to the visual impact) and in order to judge the magnitude of each impact.

- **Determine impact significance**

The potential visual impacts identified and described are quantified in their respective geographical locations in order to determine the significance of the anticipated impact. Significance is determined as a function of extent, duration, magnitude and probability. Appropriate mitigation is recommended where relevant.

3 PROJECT DESCRIPTION

The proposed expansion will entail the construction of 6 treehouses with the inclusion of a communal dining and lounge area, as well as, a Manor House comprising of 6 rooms, lounge and dining areas, kitchen, swimming pool. The treehouses will be on raised wooden decks, while the Manor House will be constructed of brick and mortar.

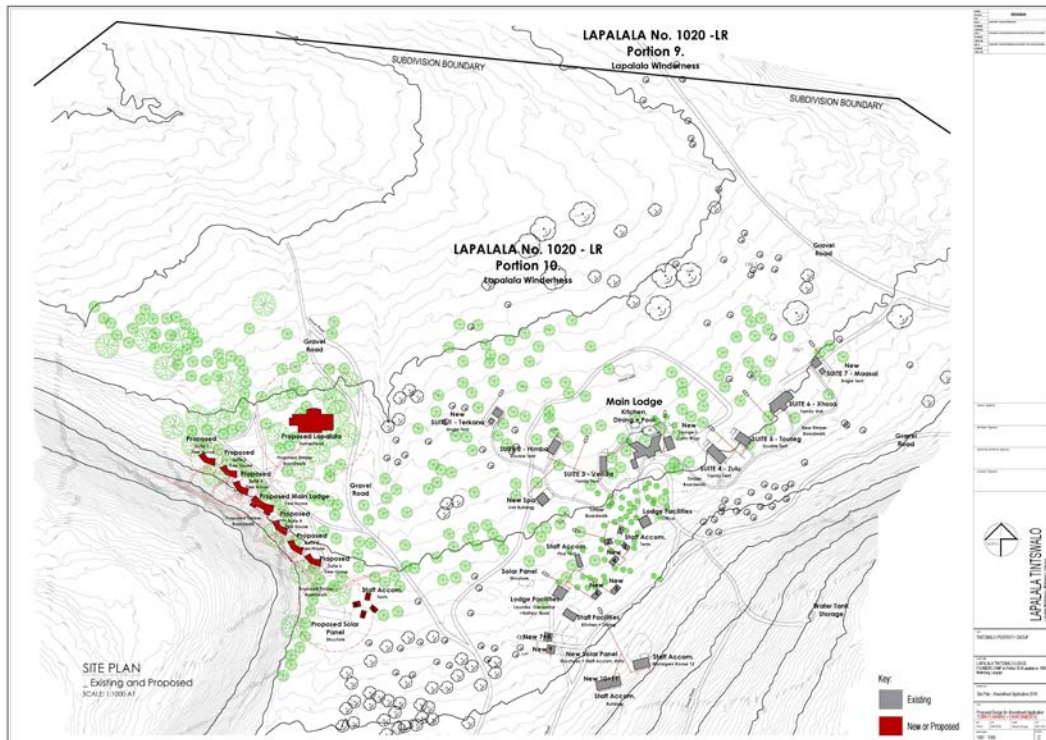
Four two bedroomed staff tents will also be constructed. Electricity will be via solar panels. All associated civil infrastructure (water, electricity and waste treatment) will be included.

The total development footprint will not exceed 1 Ha.

4 SCOPE OF WORK

The scope of work for this assessment includes the determination of the potential visual impacts in terms of nature, extent, duration, magnitude, probability and significance of the construction and operation of the proposed Founders Expansion. Mitigation measures are recommended where appropriate.

As the affected property is located within the Lapalala Wilderness Reserve and the Waterberg Biosphere Reserve, special consideration has been taken to determine what the extent of the visual impact will be on such a sensitive area.



Map 1: Proposed layout of the Founders Extensions

5 THE AFFECTED ENVIRONMENT

5.1 GENERAL ENVIRONMENT

The proposed Founders extensions is located within the Lapalala Wilderness Reserve, which is situated within the Waterberg Biosphere Reserve approximately 50 km north of Vaalwater and 80 km west of Mokopane, Lephalale Local Municipality, Limpopo Province.

The topography of the general area comprises undulating, rocky hills with level plains situated between them. Lapalala falls within the upper Lephalale River catchment which drains into the Limpopo River. The topography of the general Reserve comprises undulating hills with occasional steep valleys and level plains situated within them. Elevation at Lapalala ranges from 880 m above sea level (in the north) to 1,320 m asl (on the south-western boundary).

The study area is located within the *Savanna* biome within the summer rainfall region with a mid-summer (January) seasonality. The overall mean annual rainfall is approximately 500 mm per annum. The vegetation type is classified as *Waterberg Mountain Bushveld*³.

³ Environmental Potential Atlas (ENPAT), 2001.



Figure 1: Topography of the site and surrounds

Land use within the study area is predominately private game farms and to a lesser degree agriculture. The study area is situated within the Waterberg Mountain Bushveld vegetation type, which is in the Central Bushveld Bioregion of the Savanna Biome. Landcover comprises low to mid-high woodland that is dominated by deciduous, broad-leaved tree species, and has a grass-dominated herbaceous layer.

The majority of the study area is sparsely populated, with the highest concentration of people living in the town of Vaalwater (not situated within the study area). The study area consists of a landscape that can be described as remote due to its considerable distance from any major metropolitan centres or populated areas. Settlements, where they occur, are usually rural homesteads and farmsteads. Refer to **Map 2**.

A few homesteads are located within the Lapalala Wilderness Reserve which are mainly home to staff and Reserve Management. Construction is currently underway for a number of custodian sites containing private lodges. A fair number of farmsteads/homesteads are located just outside of the Reserve on the neighbouring properties, particularly in the east.

The Moepel Nature Reserve is located east of Lapalala Wilderness, within a number of smaller nature reserves located in the south and west. Marakele Game Reserve is also located south west of the Reserve. Settlements, where these occur, are limited in extent and domestic in scale.

However, due to the small scale of this development no visual impact will likely be noticed beyond the boundary of the Lapalala Wilderness Reserve.

In general the landscape character of the greater study area presents as rural and natural, with some agriculture. The site itself is natural in character, of note is that the site is situated within the Waterberg Biosphere Reserve.

5.2 VISUAL QUALITY

The visual quality of the receiving environment within the study areas is high, by virtue of the vast and undeveloped nature of the environment. This lends a distinct sense of place to the area. This area is known as a tourist destination owing to its location in the Waterberg Biosphere Reserve and the Game reserves within the region.

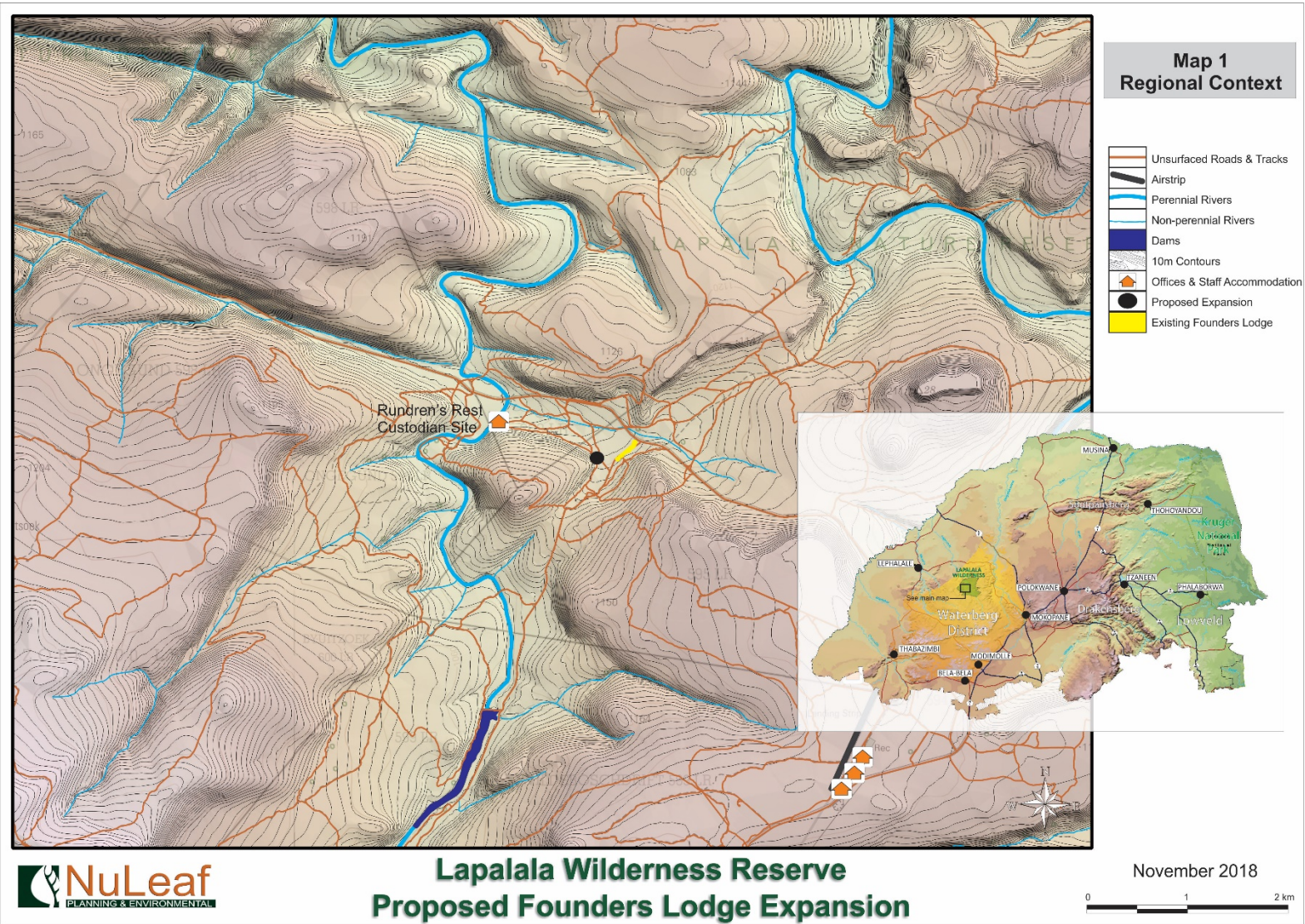


Figure 2: Visual quality of the region (Lapalala Wilderness Reserve)

The entire study area is considered highly sensitive to visual impacts due to its topography and generally low level of transformation. However, a visual impact in and around the site is already existing as a result of the Founders Lodge, of which this development is an expansion.

The proposed Founders expansion will have a low impact on the environment as the Treehouse units will be on raised platforms with timber structures. These structures will blend with the landscape through use of natural materials and vegetative covering, as all large trees will be retained and built around. The Manor house will have a slightly larger environmental impact as it will be constructed from bricks, however, it has been located within a naturally cleared area.

The remainder of the site retains more of a conservation sense of place. Therefore the visual quality of the site is high overall. Large tracts of intact natural vegetation, sensitive use of natural tones, textures and materials will be used to help the existing structures to blend in with the surrounding landscape. Indigenous landscaping will also be used to reflect the natural surrounding landscape on site in areas disturbed through construction.



Map 2: Locality map

6 ANTICIPATED ISSUES RELATED TO VISUAL IMPACT

Anticipated issues related to the potential visual impact of the proposed Founders Expansion include the following:

- The visibility of the development to, and potential visual impact on sensitive visual receptors in close proximity to the proposed development.
- Potential visual impact on sensitive visual receptors within the region.
- The visibility of the proposed development to, and potential visual impact on protected and conservation areas (i.e. Waterberg Biosphere Reserve) within the study area.
- The potential visual impact associated with the construction phase of the development on sensitive visual receptors in close proximity.
- The potential visual impact of safety and security lighting of the development at night on sensitive visual receptors in close proximity.
- The potential visual impact of the development on the visual character of the landscape and sense of place of the region.
- The potential visual impact of the solar panels on sensitive visual receptors in close proximity thereto.
- The potential cumulative visual impacts of the development within the study area.

7 RESULTS

7.1 VISUAL DISTANCE AND OBSERVER PROXIMITY

NuLeaf Planning and Environmental determined proximity offsets based on the anticipated visual experience of the observer over varying distances. In general, the severity of the visual impact on visual receptors decreases with increased distance from the proposed development.

Therefore, in order to refine the visual exposure of the development on surrounding areas/receptors, the principle of reduced impact over distance is applied in order to determine the core area of visual influence for the proposed development.

Proximity radii for the proposed development site are created in order to indicate the scale and viewing distance of the development and to determine the prominence of the structures in relation to their environment.

The proximity radii are based on the anticipated visual experience of the observer over varying distances. The distances are adjusted upwards for larger facilities and downwards for smaller facilities (i.e. depending on the size and nature of the proposed development).

Typically, the proximity radii, calculated from the boundary of the property, would be as follows for the proposed Founders Expansion:

- 0 – 1 km - Short distance views where the development would be easily and comfortably visible and recognisable.
- 1 – 3 km - Medium distance view where the development would become part of the visual environment, but could still be visible and recognisable.
- 3 - 6 km - Long distance view where the development might be visible, although this is unlikely.

7.2 POTENTIAL VISUAL EXPOSURE

The results of the viewshed analysis and potential observer proximity for the proposed Founders Expansion is shown on **Map 3** that follows.

A visibility analysis for the proposed development was generated from several representative points on site at an offset of 9m for the Manor House and 6m for the Treehouses. The receptor height within the receiving environment was set at 2m above average ground level, which is representative of a person standing upright.

This was done in order to determine the general visual exposure of the area under investigation, simulating the maximum expected heights of buildings associated with the proposed development.

The analysis does not include the potential shielding effect (i.e. VAC) of the existing environment, and does not take into consideration the limitations of the human eye, therefore signifying a worst-case scenario.

The findings of the generated viewshed are detailed below:

The potential visual exposure for the proposed Founders expansion is as follows, (Refer to **Map 3**):

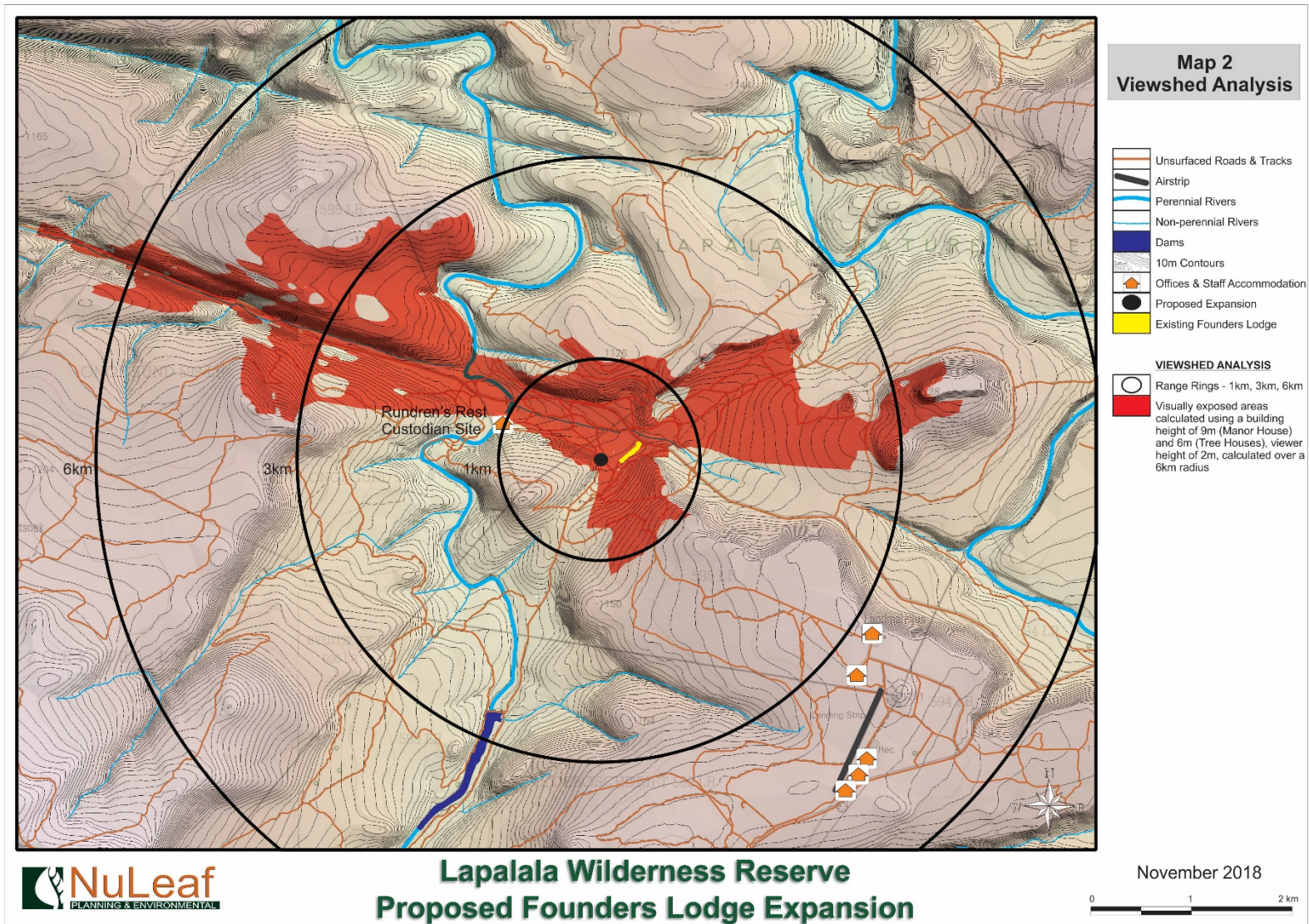
- Potential visual exposure is within 1km is concentrated mainly in the hills overlooking the site, located to the north, north west and south of the site.
- Potential visual exposure within 3km from the site is moderate, reducing somewhat between 1km and 3km from the site. Within this zone, visually exposed areas lie down the valley mainly to the north west and north east of the site in the Lapalala Wilderness Reserve only. Only one potential custodian site (Rundren's Rest) has been identified as a potential sensitive receptor within this zone.
- Between 3km and 6km from the site, potential visual exposure decreases markedly in extent, with visually exposed areas largely fragmented and lying down the valley mainly to the north west and north east of the site in the Lapalala Wilderness Reserve only. Game drive routes have been identified as potential sensitive visual receptors within this zone.



Figure 3: Panoramic of the Founders Expansion Site (North to South East)



Figure 4: Panoramic of the Founders Expansion Site (South to North West)



Map 3: Potential visual exposure of the proposed Founders Extension

7.3 VIEWER INCIDENCE, PERCEPTION AND SENSITIVITY

It is necessary to identify areas of high viewer incidence, and to classify certain areas according to the observer's visual sensitivity towards the proposed development.

Viewer incidence is highest for homesteads/custodian sites in close proximity to the site. As such tourists using the game drive routes within the Lapalala Wilderness Reserve and potentially the custodians at Rundren's Rest are considered to be the most sensitive to visual intrusion, as they will be exposed to visual intrusion during their rest and relaxation times. Refer **Map 4**.

Tourists and residential receptors in natural and rural contexts are more sensitive than those in urban contexts, due to the absence of visual clutter in these undeveloped and undisturbed areas.

No specific report can be made on viewer perception regarding this proposed development, as no reported stakeholder feedback has been received as of yet. The project does not appear to be controversial, however, and to the knowledge of the author, there are no action groups or individuals opposing the development.

7.4 VISUAL ABSORPTION CAPACITY

Visual Absorption Capacity (VAC) is the capacity of the receiving environment to absorb the potential visual impact of the proposed development. VAC is primarily a function of the vegetation, and will be high if the vegetation is tall, dense and continuous. Conversely, low growing sparse and patchy vegetation will have a low VAC.

The VAC would also be high where the environment can readily absorb the development in terms of texture, colour, form and light / shade characteristics of the structure. On the other hand, the VAC for a development contrasting markedly with one or more of the characteristics of the environment would be low.

The VAC also generally increases with distance, where discernable detail in visual characteristics of both environment and development decreases.

Overall, the Visual Absorption Capacity (VAC) of the site and surrounds is high to moderate, depending on the nature of the vegetation (i.e. natural grassland vegetation will have a low VAC and thicket and woodland would have a moderate VAC).

VAC will be taken into account in the Assessment of Visual Impacts to follow.



Figure 5: High to moderate VAC of the receiving environment

7.5 VISUAL IMPACT INDEX

The results of the visual exposure, viewer incidence / perception and visual distance of the proposed Founders Expansion are displayed on **Map 4**. Here the weighted impact and the likely areas of impact have been indicated as a visual impact index.

Values have been assigned for each potential visual impact per data category and merged in order to calculate the visual impact index. An area with short distance, a high viewer incidence and a predominantly negative perception would therefore have a higher value (greater impact) on the index. This helps in focussing the attention to the critical areas of potential impact when evaluating the issues related to the visual impact.

The visual impact index for the proposed development is further described as follows.

- The visual impact index map indicates a core zone of likely **high** visual impact on the site itself and within 1km of the proposed development, due to VAC, however, this impact is likely to be reduced down to moderate.

Sensitive visual receptors within this zone comprise mainly of users of the existing Founders Lodge infrastructure and users of the surrounding game drive routes. These receptors are likely to experience **moderate to low** visual impact, as these visual impacts are associated with a lodge experience.

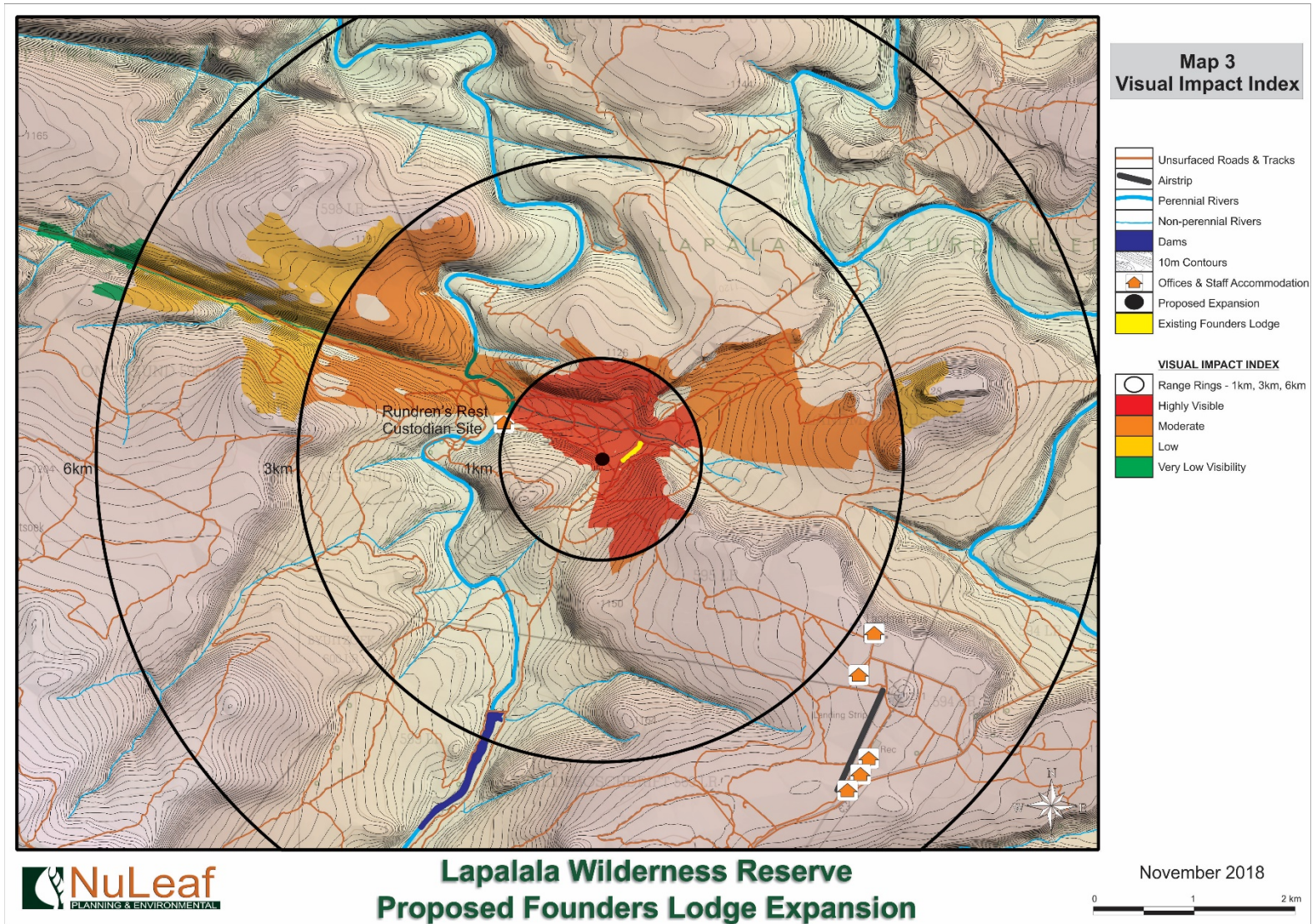
- Visual impact is likely to be **moderate** between 1km and 3km of the proposed development.

Sensitive visual receptors include future users of Custodian Site Rundren's Rest to the west, as well as, game drive routes situated to the north west and north east of the site. Particularly if these routes are located at a higher elevation. These receptors are likely to experience **very low** visual impact.

- Between 3km and 6km of the proposed development, the extent of potential visual impact is significantly reduced. Where they occur, visual impacts within this zone due to VAC are likely to be **low**.

Sensitive visual receptors at this distance include only, users of the game drive routes within the Reserve. Visual impacts on these sensitive receptors are likely to be **negligible**.

- Remaining impacts beyond 6km of the proposed development are not expected to occur at all.



Map 4: Visual Impact Index

7.6 THE POTENTIAL TO MITIGATE VISUAL IMPACTS

The primary visual impact, namely the presence of the proposed Founders Expansion, may be mitigated from a visual perspective, due to the nature and scale of the development (i.e. development footprint and height of the buildings). This mitigation potential is further supported by the nature of the receiving environment.

The following mitigation will further contribute to reducing the magnitude of the visual impacts discussed in the sections above:

- Some mitigation of primary and secondary impacts may be achieved by ensuring that the preservation and / or re-introduction of vegetation be allowed for in the planning and implementation of the development. This measure will help to soften the appearance of the facility within its context. Such mitigation includes the following:
 - Respond to the natural environment during the planning of buildings and infrastructure.
 - Retain / re-establish and maintain large trees, natural features and noteworthy natural vegetation in all areas outside of the development footprint. Adapt the development footprint to accommodate these where necessary.
 - Retain natural pockets (wetland, river and other sensitive vegetation zones) as buffers within the development and along the perimeter.
 - Retain vegetation in all areas outside of actual built footprints wherever possible.
 - Soften hard spaces and parking areas through the retention of existing vegetation or the introduction of appropriate indigenous planting.
 - Make use of muted earth tones, matt surfaces and natural materials rather than primary colours, reflective surfaces and high-tech finishes for all buildings, structures and infrastructure.
 - Tilt large window areas to negate reflection impact.
 - Limit the overall height of all buildings to a maximum of 4m.
 - Visually break up large bulky buildings into smaller, subtler, less prominent shapes and planes.
 - Avoid large areas of un-shaded reflective and hard paving surface.
 - Avoid the placement of unsightly services and infrastructure in visually prominent areas.
 - Appropriately screen service areas.
 - Manufacture PV panels with an Anti-Reflective Coating (ARC).
- Mitigation of visual impacts associated with the construction phase, albeit temporary, entails proper planning, management and rehabilitation of all construction sites. Construction should be managed according to the following principles:
 - Ensure that vegetation is not unnecessarily cleared or removed during the construction period.
 - Reduce the construction period through careful logistical planning and productive implementation of resources.
 - Plan the placement of lay-down areas and any potential temporary construction camps along the corridor in order to minimise vegetation clearing.

- Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.
 - Ensure that rubble, litter, and disused construction materials are appropriately stored (if not removed daily) and then disposed regularly at licensed waste facilities.
 - Reduce and control construction dust through the use of approved dust suppression techniques as and when required (i.e. whenever dust becomes apparent).
 - Restrict construction activities to daylight hours in order to negate or reduce the visual impacts associated with lighting.
 - Ensure that all infrastructure and the site and general surrounds are maintained and kept neat.
 - Rehabilitate all disturbed areas, construction areas, roads, slopes etc. immediately after the completion of construction works. If necessary, an ecologist should be consulted to assist or give input into rehabilitation specifications.
 - Monitor all rehabilitated areas for at least a year for rehabilitation failure and implement remedial action as required. If necessary, an ecologist should be consulted to assist or give input into rehabilitation specifications.
- Mitigation of other lighting impacts includes the pro-active design, planning and specification lighting for the development. The correct specification and placement of lighting and light fixtures will go far to contain rather than spread the light. Additional measures include the following:
 - Shielding the sources of light by physical barriers (walls, vegetation, or the structure itself);
 - Limiting mounting heights of lighting fixtures, or alternatively using foot-lights or bollard level lights;
 - Making use of minimum lumen or wattage in fixtures;
 - Making use of down-lighters, or shielded fixtures;
 - Making use of Low Pressure Sodium lighting or other types of low impact lighting.
 - Making use of motion detectors on security lighting. This will allow the site to remain in relative darkness, until lighting is required for security or maintenance purposes.
 - Following construction, the maintenance of the buildings and infrastructure is critical, and will ensure that the development does not degrade or become an eyesore.

The possible mitigation of both primary and secondary visual impacts as listed above should be implemented and maintained on an on-going basis.

8 CONCLUSION AND RECOMMENDATIONS

The construction and operation of the proposed Founders Expansions will have a limited visual impact on the scenic resources of the study area.

However, mitigation of visual impact is possible and will go far in reducing the magnitude of visual impacts discussed by softening the appearance of the development within its context. The recommendations made (see Section 7.6) should be followed and the mitigation implemented on an ongoing basis.

Considering all factors, it is concluded that the development is appropriate within its context from a visual perspective, and that the anticipated visual impacts are neither unacceptable in nature nor excessive in magnitude. Potential visual impacts are therefore not considered to be a fatal flaw for this development.

The relatively limited extent of visual receptors in the area and the high to moderate VAC of the area is a strong consideration in this regard.

Based on the above, it is the recommendation of the author that the proposed Founders Expansion development, including all proposed components, be supported from a visual perspective, subject to the implementation of the required and recommended optimisation and mitigation measures detailed in Section 7.9.

9 REFERENCES/DATA SOURCES

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