

## **PRE-APPLICATION AND APPLICATION DRAFT BAR PHASES SUMMARY OF THE PUBLIC PARTICIPATION PROCESS**

This section of the report is included in compliance with the Regulations. Public participation is an integral part of the EIA process, and affords potentially interested and potentially affected parties (I&APs) an opportunity to participate in the EIA process, or to comment on any aspect of the development proposals.

Other relevant considerations regarding the public participation process being undertaken for this project are that:

- The public participation process being undertaken for this project complies with the requirements of the Regulations.
- The description of the public participation process included in sections below itemises the steps and actions undertaken.

Adverts will be placed in the following newspaper:

- Weslander on 22 May 2025



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## ENROLLED NURSE

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- MINIMUM OF 5 YEARS EXPERIENCE AS AN ENROLLED NURSE
- COMPUTER SKILLS
- HAVE A STRONG WORK ETHIC AND ENJOY WORKING IN A TEAM ENVIRONMENT

EMAIL CV TO: [Vredenburg.gps@gmail.com](mailto:Vredenburg.gps@gmail.com)  
CLOSING DATE: 04/06/2025

NR167120-04/06/2025

## Vorm JJJ VERLORE OF VERNIETIGDE TITELBEWYS

Hiermee word kennis gegee dat kragtens die bepaling van Regulasie 68(1) van die Registrasie van Aktes Wet, 1937, dat die voorneme is om aansoek te doen om 'n gesertifiseerde afskrif van Transportakte Nr. T 70702010 gepasseer deur Hans Teles, identifikasienommer 51 7011 5170 085, ongetroud, ten gunste van Michael Van Wyk, identifikasienommer 860515 5125 089, Ongetroud, ten opsigte van Erf 14349 Vredenburg, in die Munisipaliteit Saldanha, Afdeling Malmesbury, Wes-Kaap Provinsie wat verlore geraak of vernietig.

Alle persone wat leen die uitreiking van sodanige afskrif beswaar het, word hierby versoek om dit skriftelik in te dien by die Registrateur van Aktes WESKAAP, te KAAPSTAD, KAMER NUMMER 1216, 12de VLOER, PLEIN STRAAT 90, KAAPSTAD binne twee weke na datum van publikasie van hierdie kennisgewing.

BRAND & VENNOTE PROKUREURS,  
Van Zylstraat 1, Vredenburg,  
Tel: 022 7151671,  
E-pos: [ashneen@brandandpartners.co.za](mailto:ashneen@brandandpartners.co.za)  
Werv. C1110AM



NR167120-04/06/2025

## NOTICE OF ENVIRONMENTAL IMPACT ASSESSMENT AND PUBLIC PARTICIPATION PROCESSES

### DWARKSERSBOS 2 SOLAR PV ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE, WESTERN CAPE PROVINCE

Applicant: SALIKA South Africa (Pty) Ltd

**Proposed Activity:** The development of Dwarksersbos 2 Solar Photovoltaic (PV) Energy Facility with a generating capacity of up to 550MWp.

**Location:** The proposed site is located ~6km east (at the closest) of the town of Veldclif, within the Bergivier Local Municipality in the Western Cape Province on the following properties:

- Weglopeshuwei Farm No 116E
- Weglopeshuwei Farm No 245
- Portions 11 and 15 of the Farm No 113
- Dons Vlokte Farm No 114
- Farm No 107RE

**Environmental Impact Assessment Processes:** In terms of Sections 24 and 24D of the National Environmental Management Act (No 107 of 1998), as read with Government Notice R324-R327, as amended, Environmental Authorisation (EA) is required for the above-mentioned projects. A Scoping & Environmental Impact Assessment (EIA) process is required to be undertaken in support of an application for authorisation for the proposed Dwarksersbos 2 Solar PV Facility and Associated Infrastructure. Savannah Environmental is undertaking the required S&EIA and public participation process for this project.

**EIA Report available for Public Review & Comment:** An EIA Report in support of the Application for Environmental Authorisation for the Solar PV facility and associated infrastructure has been compiled and will be available for review and comment for a 30-day period from **Friday, 23 May 2025 until Monday, 23 June 2025**.

The EIA Report is available for download on the Savannah Environmental website: <https://savannahsa.com/public-documents/energy-generation/dwarksersbos-2-solar-pv-energy-facility/>

To register as an interested and/or affected party, please submit your name, contact information and interest in the matter or issues to be addressed in writing to the below-mentioned consultant.

**Molalela Ledwaba of Savannah Environmental**  
P.O. Box 148, Sunninghill, 2157  
Tel: 011 654 3237  
Mobile: 060 978 8396  
Fax: 086 684 0547  
Email: [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)  
Website: [www.savannahsa.com](http://www.savannahsa.com)



NR167120-04/06/2025

## ADVERT

(30 DAYS PERIOD EXCLUDING PUBLIC HOLIDAYS FROM DATE OF PUBLICATION)  
NOTIFICATION FROM ENVIRO-EAP THAT IT IS AVAILABLE.

APPLICATION IN TERMS OF THE NEMA EIA REGULATIONS, 2014 (AS AMENDED) DEAD&DP REFERENCE NUMBER  
16/3/6/71/F4/26/3178/24

Notice of a Public Participation Process (PPP) is hereby given in terms of the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended). This notice also serves to inform the public that the draft report and its Appendices for the Application will be available for public comment on our website: <https://enviro-eap.co.za/public-participation/>. When landing on the Public Participation Page on the website please scroll down until you locate the project title as indicated above (valid for full duration of 30 day commenting period). **TAKE NOTE THIS WILL ONLY BE AVAILABLE ON THE WEBSITE WHEN YOU AS REGISTERED INTERESTED AND AFFECTED PARTY GET NOTIFICATION FROM ENVIRO-EAP THAT IT IS AVAILABLE.** The proposed development entails the establishment of approximately 214 residential erven and associated infrastructure for the Stompneus Bay IRDP Housing Development on Portion 4 of the Farm Duyker Eiland No. 6, St. Helena Bay.

**Location:** Access will be directly off of Main Road, Stompneus bay and Stompneus Vredenburg road.

**Listed Activities:** The application process for Environmental Authorisation will follow a Basic Environmental Impact Assessment process. The proposed development constitutes Listed Activities 9, 24, 27 and 28 of Listing Notice 1 and Activities 4 and 12 of Listing Notice 3 of the EIA Regulations, 2014 (as amended).

**Exemption:** No application for any exemption is sought.

**Opportunity to participate:** Interested and Affected Parties are invited to register interest for the respective application within the process, or provide written comments to Enviro-EAP within 30 days of this notice (excluding public holidays). The project title, your full name, contact details, plus indication of any direct business, financial, personal or other interest you may have in this application must please be provided and fully described. The personal information and comments provided will be included in reports to be circulated and submitted to the Competent Authority to enable informed decision-making. Also, if you choose to register as an I&AP your personal information will be made available for purposes of being informed and given access to reports and comments received. This information will be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

Contact: Nicolaas Hanekom  
Enviro-EAP, PO Box 205, Agulhas 7287  
Tel/Cel: 076 963 6450  
mail: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Contact: Nicolaas Hanekom  
Enviro-EAP, PO Box 205, Agulhas 7287  
Tel/Cel: 076 963 6450  
email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

NR167120-04/06/2025

## SALDANHA BAY MUNICIPALITY

TENDER NUMBER: SBM 50/24/25

**TENDER BESKRYWING: HUUR EN DIENS VAN MOBILE TOILETTE VIR SALDANHA BAY MUNISIPALITEIT VIR 'N PERIODE WAT EINDIG 30 JUNIE 2028.**

Tender dokumente is beskikbaar om afgelaai te word op die e-Tender publikasie webtuiste [www.etenders.gov.za](http://www.etenders.gov.za) of kan alternatiewelik verkry word by Mv. Rosaire Farmer, Hoofstraat 15, Beleggingsentrum, Vredenburg vanaf **Maandag, 26 Mei 2025**.

Indien tender dokumente verkry word, moet 'n nie-terugbetaalbare tender deposito van R278.00 betaal word aan Saldanha Bay Munisipaliteit. 'n Bewys van betaling moet aangebied word vir die verkryging van tender dokumente.

**Navrae:** Mnr. R. Groenewald en Ms. N. Qolo

**E-pos:** [ryan.groenewald@sbm.gov.za](mailto:ryan.groenewald@sbm.gov.za)  
[neliswa.qolo@sbm.gov.za](mailto:neliswa.qolo@sbm.gov.za)

Tenders moet in die tenderbus by die Beleggingsentrum, Hoofstraat 15, Vredenburg ingedien word **voor 12H00 op Vrydag, 13 Junie 2025** en moet in 'n gesêelde kovert wees waarop daar aan die buitekant duidelik gemerk is die bovermelde tender nommer en beskrywing.

'n Verpligte inligtingsessie sal plaasvind in die Munisipale Raadsaal, geleë te Hoofstraat 12, Vredenburg op **Vrydag, 30 Mei 2025 stiptelik om 12H00. Geen grasietydperk sal toegelaai word nie.**

Die sluitingsuur sal die tenders in die publiek oopgemaak word. Enige of die laagste tender sal nie noodwendig aanvaar word nie.

Die 80/20 voorkeur-puntestelsel soos vervat in die Voorkeur Verkrygings Beleid, R7/5-24, van 23 Mei 2024 sal in die beoordeling van hierdie tender gebruik word.

'n Geldige inkomstebelasting uitklaringsertifikaat, soos uitgereik deur die Suid-Afrikaanse Inkomstediens, moet tesame met die tender dokument ingehandig word, en die tenderaar moet voldoen aan die belastingvoorwaardes op die Sentrale Verkaffers Databasis (CSD).

Mnr. H. Mettler  
MUNISIPALE BESTUURDER  
Saldanha Bay Munisipaliteit  
Privaatsak X12  
VREDENBURG  
7380

K40/25

## SALDANHA BAY MUNICIPALITY

TENDER NUMBER: SBM 50/24/25

**TENDER DESCRIPTION: HIRE AND SERVICING OF PORTABLE TOILETS FOR SALDANHA BAY MUNICIPALITY FOR A PERIOD ENDING 30 JUNE 2028.**

Tender documents can be downloaded from the e-Tender publication portal at [www.etenders.gov.za](http://www.etenders.gov.za) or alternatively can be collected from Mrs. Rosaire Farmer, 15 Main Road, Investment Centre, Vredenburg from **Monday, 26 May 2025**.

If tender documents are collected, a non-refundable tender deposit of R 278.00 is payable to Saldanha Bay Municipality. A proof of deposit is required for the collection of tender documents.

**Enquiries:** Mr. R. Groenewald and Ms. N. Qolo

**Email:** [ryan.groenewald@sbm.gov.za](mailto:ryan.groenewald@sbm.gov.za) and  
[neliswa.qolo@sbm.gov.za](mailto:neliswa.qolo@sbm.gov.za)

Tenders must be placed in the tender box of the Investment Centre, Ground Floor, 15 Main Road, Vredenburg, **before 12H00 on Friday, 13 June 2025**, in a sealed envelope where on the outside is clearly marked the above-mentioned tender number and description.

A compulsory information session will take place at the Municipal Council Chamber, situated at 12 Main Road, Vredenburg on **Friday, 30 May 2025 promptly at 12H00. No grace period will be allowed.**

The tenders shall be opened in the public after the closing hour. Any or the lowest tender will not necessarily be accepted.

The 80/20 preference point system as contained in the Preferential Procurement Policy, R7/5-24, of 23 May 2024 will be used in the adjudication of this tender.

A valid tax clearance certificate, from the South African Revenue Services, must be supplied with the tender document, and the tenderer must be tax-compliant on the Central Supplier Database (CSD).

Mr. H. Mettler  
MUNICIPAL MANAGER  
Saldanha Bay Municipality  
Private Bag X12  
VREDENBURG  
7380

N40/25

## SALDANHA BAY MUNICIPALITY

TENDER NUMBER: SBM 54/24/25

**TENDER BESKRYWING: VOORSIENING EN LEWERING VAN VULLIS HOUERS EN VERWYDERING VAN HERWINBARE UITGEDIENDE VULLIS HOUERS VIR DIE PERIODE 01 JULIE 2025 TOT 30 JUNIE 2028.**

Tender dokumente is beskikbaar om afgelaai te word op die e-Tender publikasie webtuiste [www.etenders.gov.za](http://www.etenders.gov.za) of kan alternatiewelik verkry word by Mv. Rosaire Farmer, Hoofstraat 15, Beleggingsentrum, Vredenburg vanaf **Maandag, 26 Mei 2025**.

Indien tender dokumente verkry word, moet 'n nie-terugbetaalbare tender deposito van R278.00 betaal word aan Saldanha Bay Munisipaliteit. 'n Bewys van betaling moet aangebied word vir die verkryging van tender dokumente.

**Navrae:** Mnr. A. Nackerdien

**E-pos:** [abubaker.nackerdien@sbm.gov.za](mailto:abubaker.nackerdien@sbm.gov.za)

Tenders moet in die tenderbus by die Beleggingsentrum, Hoofstraat 15, Vredenburg ingedien word **voor 12H00 op Vrydag, 13 Junie 2025** en moet in 'n gesêelde kovert wees waarop daar aan die buitekant duidelik gemerk is die bovermelde tender nommer en beskrywing.

Na die sluitingsuur sal die tenders in die publiek oopgemaak word. Enige of die laagste tender sal nie noodwendig aanvaar word nie.

Die 80/20 voorkeur-puntestelsel soos vervat in die Voorkeur Verkrygings Beleid, R7/5-24, van 23 Mei 2024 sal in die beoordeling van hierdie tender gebruik word.

'n Geldige inkomstebelasting uitklaringsertifikaat, soos uitgereik deur die Suid-Afrikaanse Inkomstediens, moet tesame met die tender dokument ingehandig word, en die tenderaar moet voldoen aan die belastingvoorwaardes op die Sentrale Verkaffers Databasis (CSD).

Mnr. H. Mettler  
MUNISIPALE BESTUURDER  
Saldanha Bay Munisipaliteit  
Privaatsak X12  
VREDENBURG  
7380

K41/25

## SALDANHA BAY MUNICIPALITY

TENDER NUMBER: SBM 54/24/25

**TENDER DESCRIPTION: SUPPLY AND DELIVERY OF REFUSE CONTAINERS AND REMOVAL AND RECYCLING OF REDUNDANT REFUSE CONTAINERS FOR THE PERIOD 01 JULY 2025 TILL 30 JUNE 2028.**

Tender documents can be downloaded from the e-Tender publication portal at [www.etenders.gov.za](http://www.etenders.gov.za) or alternatively can be collected from Mrs. Rosaire Farmer, 15 Main Road, Investment Centre, Vredenburg from **Monday, 26 May 2025**.

If tender documents are collected, a non-refundable tender deposit of R 278.00 is payable to Saldanha Bay Municipality. A proof of deposit is required for the collection of tender documents.

**Enquiries:** Mr. A. Nackerdien

**Email:** [abubaker.nackerdien@sbm.gov.za](mailto:abubaker.nackerdien@sbm.gov.za)

Tenders must be placed in the tender box of the Investment Centre, Ground Floor, 15 Main Road, Vredenburg, **before 12H00 on Friday, 13 June 2025**, in a sealed envelope where on the outside is clearly marked the above-mentioned tender number and description.

The tenders shall be opened in the public after the closing hour. Any or the lowest tender will not necessarily be accepted.

The 80/20 preference point system as contained in the Preferential Procurement Policy, R7/5-24, of 23 May 2024 will be used in the adjudication of this tender.

A valid tax clearance certificate, from the South African Revenue Services, must be supplied with the tender document, and the tenderer must be tax-compliant on the Central Supplier Database (CSD).

Mr. H. Mettler  
MUNICIPAL MANAGER  
Saldanha Bay Municipality  
Private Bag X12  
VREDENBURG  
7380

N41/25

The notice board was placed on site on 23 May 2025



Site Notice location map



The draft Basic Assessment Report was emailed to the following key Departments.

STAKEHOLDER	CONTACT PERSON	EMAIL ADDRESS
DEA&DP: Development Management Private Bag X9086 Cape Town 8000	The Director Region 1 Mr. Zaahir Toefy	'Zaahir.Toefy@westerncape.gov.za' <a href="mailto:DEADPEIAAdmin@westerncape.gov.za">DEADPEIAAdmin@westerncape.gov.za</a>
CapeNature Private Bag X5014 Stellenbosch 7599	Mr. Marius Wheeler Ismat Adams	<a href="mailto:mwheeler@capenature.co.za">mwheeler@capenature.co.za</a> 'iadams@capenature.co.za
DEA&DP: Pollution and Chemicals Management Private Bag X9086 Cape Town 8000	Ms Natasha Davis- Wolmarans	<a href="mailto:Natasha.Davis-Wolmarans@westerncape.gov.za">Natasha.Davis-Wolmarans@westerncape.gov.za</a>
DEA&DP: Waste Management Private Bag X9086 Cape Town 8000	Mr. Saliem Haider Mr. Lance McBain- Charles	Saliem.Haider@westerncape.gov.za <a href="mailto:Lance.McBain-Charles@westerncape.gov.za">Lance.McBain-Charles@westerncape.gov.za</a>

Department of Water and Sanitation Private Bag X16 Sanlamhof 7532	Mrs. Nelissa Nbobeni Mr. Warren Dreyer	<a href="mailto:ndobenin2@dws.gov.za">ndobenin2@dws.gov.za</a> <a href="mailto:DreyerW@dws.gov.za">DreyerW@dws.gov.za</a>
Heritage Western Cape Private Bag X9067 Cape Town 8001	CEO Heritage Western Cape	<a href="mailto:Ceoheritage@westerncape.gov.za">Ceoheritage@westerncape.gov.za</a>
Saldanha Bay Municipality Private Bag X12 Vredenburg 7380	Municipal Manager Mayor Ward Councillors Ms. N. Duarte	<a href="mailto:mun@sbm.gov.za">mun@sbm.gov.za</a> <a href="mailto:Nazeema.Duarte@sbm.gov.za">Nazeema.Duarte@sbm.gov.za</a>
Department of Agriculture, Western Cape: Land Use Private Bag X1 Elsenburg 7607	Cor van der Walt Brandon Layman	<a href="mailto:landuse.elsenburg@elsenburg.com">landuse.elsenburg@elsenburg.com</a> <a href="mailto:Brandon.Layman@westerncape.gov.za">Brandon.Layman@westerncape.gov.za</a> <a href="mailto:cor.vanderwalt@westerncape.gov.za">cor.vanderwalt@westerncape.gov.za</a>
West Coast District Municipality PO Box 242 Moorreesburg 7380	The Municipal Manager / Mayor / Ward Councillors	WCDM Correspondence < <a href="mailto:mun@wcdm.co.za">mun@wcdm.co.za</a> > <a href="mailto:westcoastdm@wcdm.co.za">westcoastdm@wcdm.co.za</a>
Department: Transport and Public Works Western Cape Government PO Box 2603 Cape Town 8000	Head of Department	' <a href="mailto:HOD.TransportPublicWorks@westerncape.gov.za">HOD.TransportPublicWorks@westerncape.gov.za</a> '
The Director Western Cape Government: Department of Infrastructure Project Administration: Project Approvals 9th Floor 27 Wale Street CAPE TOWN 8001	Priscilla Van As	<a href="mailto:Priscilla.VanAs@westerncape.gov.za">Priscilla.VanAs@westerncape.gov.za</a>

And registered I&AP'S  
Registered I&AP's to date.

Steph Bekker [steph.bekker@yahoo.com](mailto:steph.bekker@yahoo.com)  
antonelizeknoetze [antonelizeknoetze@gmail.com](mailto:antonelizeknoetze@gmail.com)  
Leandi Klopper [leandik6@gmail.com](mailto:leandik6@gmail.com)  
Stoan Bartel, Chairperson: St Helena Bay Business Chamber [chair@shbbc.co.za](mailto:chair@shbbc.co.za)  
Janine Greeff [janineg@l2b.co.za](mailto:janineg@l2b.co.za)  
Pierre de Villiers [pmdev1965@gmail.com](mailto:pmdev1965@gmail.com)  
Michelle Sutherland [michellesutherland12@gmail.com](mailto:michellesutherland12@gmail.com)  
Fiona Macduff [animacduff@gmail.com](mailto:animacduff@gmail.com)  
Rachelle [rseymore.mackay@gmail.com](mailto:rseymore.mackay@gmail.com)  
Pam Macmillan [macpam01@gmail.com](mailto:macpam01@gmail.com)  
Graham Priest [graham.priest@gmail.com](mailto:graham.priest@gmail.com)  
Jonelle Priest [jonelle.priest@gmail.com](mailto:jonelle.priest@gmail.com)  
Martie Eksteen [martie.aluminium@prinro.co.za](mailto:martie.aluminium@prinro.co.za)  
John Evans [evansjohne6@gmail.com](mailto:evansjohne6@gmail.com)  
Susan Rust <sumarust@gmail.com>  
Lazarus Joseph [aloejosop@gmail.com](mailto:aloejosop@gmail.com)  
Bosch, Malcolm <Malcolm.Bosch@sbm.gov.za>

Notices were sent via the municipal officials during the rezoning application to all neighbours and occupiers of land adjacent. Neighbours notification of the rezoning application must be sent to all neighbours by the municipality. The attached site notice was included in the neighbours notices sent to all neighbours. The notice requested them to register as Interested and Affective Parties (I&APs) and invited them to provide written comments together with the above reference number, their name, contact details and an indication of any direct business, financial, personal or other interest which they have in the application to the contact person indicated below within 30 days from the date of this notice. The notice also requested the owner to inform all persons residing on the property.

Neighbours notices (refer to below) will be sent via municipal notification of neighbours notices on land use rezoning application. Proof will be included in draft BAR.

#### **STEPS TAKEN TO NOTIFY POTENTIALLY INTERESTED AND AFFECTED PARTIES**

This section of the report is included in compliance with the Regulations.

Potential I&APs were notified about the project by:

1. Fixing three notice boards at the boundary of the site in compliance with the Regulations. All relevant and required information was displayed on the notice board. The notice board contained the following minimum information (Size of Board 89 x 42 cm):
  - how to register as an interested and affected party;
  - the manner in which representations on the application may be made;
  - where further information on the application or activity can be obtained; and
  - the contact details of the person(s) to whom representations may be made.
  - The fact that the public participation process had commenced, that a basic assessment process will be followed, the dates within which they can register or send comments and what the proposed activity constituted, was displayed.
2. Giving written notice to owners and occupiers of land adjacent to the site where the activity is to be undertaken, the municipal councillor of the ward within which the site is located, the local municipality and those organs of state having jurisdiction in respect of any aspect of the project as required by the Regulations.

3. Placing an advertisement in a local newspaper in compliance with the Regulations.  
Advert was placed in the Weslander notifying the public of the development and inviting them to register as Interested and Affected Parties within 30 days.
4. Lists of Identified and Registered Interested and Affected Parties  
This section of the report is included in compliance with the Regulations. This list includes the potential as well as the registered Interested and Affected Parties. The list of parties who were identified as potential I&APs as per the requirements of the Regulations and the list of parties who requested registration as an I&AP, and who are registered on the I&AP database for the project as required in terms of the Regulations were included. A Comments and Response Report from registered I&AP's will be included.
5. Workshop with Key Role players  
No workshops were held.

**TABLE 2: LIST OF KEY DEPARTMENTS AND REGSITERED INTERESTED & AFFECTED PARTIES**

STAKEHOLDER	CONTACT PERSON	EMAIL ADDRESS
DEA&DP: Development Management Private Bag X9086 Cape Town 8000	The Director Region 1 Mr. Zaahir Toefy	'Zaahir.Toefy@westerncape.gov.za' <a href="mailto:DEADPEIAAdmin@westerncape.gov.za">DEADPEIAAdmin@westerncape.gov.za</a>
CapeNature Private Bag X5014 Stellenbosch 7599	Mr. Marius Wheeler Ismat Adams	<a href="mailto:mwheeler@capenature.co.za">mwheeler@capenature.co.za</a> 'iadamscapenature.co.za
DEA&DP: Pollution and Chemicals Management Private Bag X9086 Cape Town 8000	Ms Natasha Davis- Wolmarans	<a href="mailto:Natasha.Davis-Wolmarans@westerncape.gov.za">Natasha.Davis-Wolmarans@westerncape.gov.za</a>
DEA&DP: Waste Management Private Bag X9086 Cape Town 8000	Mr. Saliem Haider Mr. Lance McBain- Charles	Saliem.Haider@westerncape.gov.za <a href="mailto:Lance.McBain-Charles@westerncape.gov.za">Lance.McBain-Charles@westerncape.gov.za</a>
Department of Water and Sanitation Private Bag X16 Sanlamhof 7532	Mrs. Nelissa Nbobeni Mr. Warren Dreyer	<a href="mailto:ndobenin2@dws.gov.za">ndobenin2@dws.gov.za</a> <a href="mailto:DreyerW@dws.gov.za">DreyerW@dws.gov.za</a>
Heritage Western Cape Private Bag X9067 Cape Town 8001	CEO Heritage Western Cape	<a href="mailto:Ceoheritage@westerncape.gov.za">Ceoheritage@westerncape.gov.za</a>
Saldanha Bay Municipality	Municipal Manager Mayor Ward Councillors Ms. N. Duarte	<a href="mailto:mun@sbm.gov.za">mun@sbm.gov.za</a> <a href="mailto:Nazeema.Duarte@sbm.gov.za">Nazeema.Duarte@sbm.gov.za</a>

Private Bag X12 Vredenburg 7380		
West Coast District Municipality PO Box 242 Moorreesburg 7380	The Municipal Manager / Mayor / Ward Councillors	WCDM Correspondence <mun@wcdm.co.za westcoastdm@wcdm.co.za
Department: Transport and Public Works Western Cape Government PO Box 2603 Cape Town 8000	Head of Department	'HOD.TransportPublicWorks@westerncape.gov.za'
The Director Western Cape Government: Department of Infrastructure Project Administration: Project Approvals 9th Floor 27 Wale Street CAPE TOWN 8001	Priscilla Van As	Priscilla.VanAs@westerncape.gov.za
Department of Agriculture, Western Cape: Land Use Private Bag X1 Elsenburg 7607	Cor van der Walt Brandon Layman	<a href="mailto:landuse.elsenburg@elsenburg.com">landuse.elsenburg@elsenburg.com</a> <a href="mailto:Brandon.Layman@westerncape.gov.za">Brandon.Layman@westerncape.gov.za</a> <a href="mailto:cor.vanderwalt@westerncape.gov.za">cor.vanderwalt@westerncape.gov.za</a>
Registered I&APs	Steph Bekker Antonelize Knoetze Leandi Klopper Stoan Bartel, Chairperson: St Helena Bay Business Chamber Janine Greeff Pierre de Villiers Michelle Sutherland Fiona Macduff John Evans Martie Eksteen Graham Priest Jonelle Priest Pam Macmillan Susan Rust Lazarus Joseph	<a href="mailto:steph.bekker@yahoo.com">steph.bekker@yahoo.com</a> <a href="mailto:antonelizeknoetze@gmail.com">antonelizeknoetze@gmail.com</a> <a href="mailto:leandik6@gmail.com">leandik6@gmail.com</a> <a href="mailto:chair@shbbc.co.za">chair@shbbc.co.za</a> <a href="mailto:janineg@l2b.co.za">janineg@l2b.co.za</a> <a href="mailto:pmdev1965@gmail.com">pmdev1965@gmail.com</a> <a href="mailto:michellesutherland12@gmail.com">michellesutherland12@gmail.com</a> <a href="mailto:animacduff@gmail.com">animacduff@gmail.com</a> <a href="mailto:evansjohne6@gmail.com">evansjohne6@gmail.com</a> <a href="mailto:martie.aluminium@prinro.co.za">martie.aluminium@prinro.co.za</a> <a href="mailto:graham.priest@gmail.com">graham.priest@gmail.com</a> <a href="mailto:jonelle.priest@gmail.com">jonelle.priest@gmail.com</a> <a href="mailto:macpam01@gmail.com">macpam01@gmail.com</a> sumarust@gmail.com aloepjosop@gmail.com Malcolm.Bosch@sbm.gov.za

## PROOF OF SENDING PRE-APPLICATION DRAFT BAR

### Nicolaas Hanekom

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**From:** Nicolaas Hanekom  
**Sent:** Monday, August 25, 2025 2:01 PM  
**To:** LutendoN@Dalrrd.gov.za; 'HOD.TransportPublicWorks@westerncape.gov.za'; 'westcoastdm@wcdm.co.za'; 'WCDM Correspondence'; mun@sbm.gov.za; Ceoheritage; Ndobeni Nelisa (BVL); Dreyer Warren <DreyerW@dws.gov.za> (DreyerW@dws.gov.za); Saliem Haider; Arabel McClelland; 'Ismat Adams'; mwheeler@capenature.co.za; DEADP EIA Admin; Duarte, Nazeema; 'Joy Leaner'; Priscilla.VanAs@westerncape.gov.za; Saa-rah Adams; Johmandie Pienaar; Nicolaas Hanekom  
**Cc:** Jean de Klerk (Cape Town); Nackerdien, Rashied; Admin; Lawrence, Cameron; Khuselo, Luvuyo; Groenewald, Ryan  
**Subject:** PRE-APPLICATION DRAFT BAR FOR 30 DAYS COMMENT. DEA&DP REFERENCE NUMBER: 16/3/3/6/7/1/F4/26/3178/24. THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME ("IRDP") HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE OF APPROXIMATELY 5.9HA

**AVAILABILITY OF PRE-APPLICATION DRAFT BAR FOR 30 DAYS COMMENT. THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME ("IRDP") HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE OF APPROXIMATELY 5.9HA ON PORTION 4 OF FARM DUYKER EILAND NO. 6, ST. HELENA BAY.**

**DEA&DP REFERENCE NUMBER: 16/3/3/6/7/1/F4/26/3178/24.**

Dear Key departments and registered Interested and affected Parties. Take note that the registered Interested and Affected Parties were blind cc to protect their privacy.

This email serves as a notification of the availability of the Pre-Application Draft BAR and appendices for **30-day** commenting period. Please take note of the details below which set out: - (1) How you can access the Pre-Application Draft BAR and appendices, (2) the commenting period and deadline for the submission of comments, and (3) how to submit of comments.

The Pre-Application Draft BAR and appendices are accessible via: -

- (i) electronic download on our website at: <https://enviro-eap.co.za/public-participation/>. When landing on the Public Participation Page on the website please scroll down until you locate the project title as indicated above. **(valid for full duration of 30 day or during the full commenting period)**.
- (ii) The report and appendixes can be downloaded using sharefolder link  [Stompneus-Bay-Housing-Pre-Application-DBAR](#)

Comments on the Pre-Application Draft BAR and appendices must be submitted to the EAP within 30 days (excluding public holidays, by not later than on or before **25 September 2025**.

Please take note that I did go onto the website and check that the report is available and that the Pre-Application Draft BAR and appendices can be downloaded. Please don't hesitate to contact me should you have any problems accessing the documents or if you require a cd or hard copy or another electronic link in order to access the report.

**(2) COMMENTING PERIOD OF THE PRE-APPLICATION DRAFT BAR AND DEADLINE FOR COMMENTS SUBMISSION**

The commenting period of the Pre-Application Draft BAR and appendices is **30 days EXCLUDING PUBLIC HOLIDAYS**, from the **26 August 2025** ending on the **25 September 2025**. Your comments on the report and appendices must be provided within the regulatory 30-day commenting period or by no later than the **25/09/2025**.

**CONSULTATION WITH ORGANS OF STATE / KEY DEPARTMENTS [NEMA S240]**

To facilitate adequate consultation with State Departments that administers laws relating to a matter affecting the environment in accordance with the requirements of Section 240 of NEMA, please be advised that all registered

interested and affected parties, organs of state, key departments, and/or stakeholders were [in receipt of this email] notified electronically of the availability of the Pre-Application Draft BAR and its appendices on this date **25 August 2025, commenting period commence on 26 August 2025**. As such all RI&APs and Stakeholders are considered to be "in possession" of the Pre-Application Draft BAR and appendices from the date of electronic notification.

**(3) SUBMISSION OF COMMENTS**

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

**Responsible EAP:** Nicolaas Hanekom

**Email:** [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

I trust the above is in order, kindly acknowledge receipt.

Vriendelike Groete / Kind regards

Nicolaas Hanekom  
Director, Enviro-EAP  
Pri Sci Nat (Reg. No. 004415)  
Ecological Science (Pri.Sci.Nat); Aquatic Science & Conservation Science (Cand.Sci.Nat)  
Reg. EAP (EAPASA): 2020/1146  
Competent Carbon Footprint Analyst

**Contact number:** 076 963 6450  
School str 2  
Agulhas  
South Africa  
7287



**Enviro-EAP**  
Environmental Consultants



 Enviro-EAP (Pty) Ltd  
Reg: 2018/435233/07  
Director: Nicolaas Hanekom  
EAP's: Johndie Pienaar & Lauren Abrahams

 Office: +27 (0) 76 963 6450  
Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)  
Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

 Postal Address:  
School Str 2  
Agulhas  
South Africa  
7287

Under the Protection of Personal Information Act, 04 of 2013 ("POPIA"), we have a general legal duty to protect information we process. Enviro-EAP (Pty) Ltd is committed to ensuring the security and protection of the personal information processed by the organization, and to provide a compliant and consistent approach to data protection. The information contained in this email and any attachments thereto may be privileged or confidential and are only intended for the exclusive use and attention of the addressed recipient. If you have received this email by mistake, please delete same and advise the sender immediately. Should you have any questions related to our POPIA compliance, please contact [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za) or you may refer to Privacy Policy on our website.

**TABLE 3: COMMENTS AND RESPONSES TABLE – PRE-APPLICATION DRAFT BAR**

STAKEHOLDER/IAP	DATE	COMMENT	RESPONSE
Department of Environmental Affairs and Development Planning Saa-rah Adams Directorate: Development Management, Region 1	Letter dated 20 SEPTEMBER 2024	<p>ACKNOWLEDGEMENT OF RECEIPT AND COMMENT ON THE NOTICE OF INTENT (“NOI”) TO SUBMIT AN APPLICATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) (“NEMA”) ENVIRONMENTAL IMPACT ASSESSMENT (“EIA”) REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME (“IRDP”) HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON PORTION 4 OF FARM DUYKER EILAND NO. 6, ST. HELENA BAY.</p> <p>1. The NOI and associated documents dated and received by this Department via electronic correspondence on 11 September 2024, refer.</p> <p>2. This letter serves as an acknowledgement of receipt by the Department of the aforementioned documents.</p> <p>3. Following review of the information submitted to this Department, the following is noted:</p> <p>3.1. The proposed development entails the establishment of approximately 214 residential erven and associated infrastructure for the Stompneus Bay IRDP Housing Development on Portion 4 of the Farm Duyker Eiland No. 6, St. Helena Bay.</p> <p>3.2. The proposal is comprised of:</p> <p>3.2.1. Residential zone 1 erven (with an area of approximately 120m<sup>2</sup> each) for IRDP housing;</p> <p>3.2.2. A place of public worship (1087m<sup>2</sup>);</p> <p>3.2.3. An institutional zone erf for a creche (1081m<sup>2</sup>);</p> <p>3.2.4. Internal roads with 10m road reserves, which will be approximately 5.5m and 5.0m wide; and</p> <p>3.2.5. associated infrastructure and services.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Correct. This is the alternative. The layout has changed but will be described in the pre-application draft BAR.</p> <p>Correct. This is the alternative. The layout has changed but will be described in the pre-application draft BAR.</p>

		<p>3.3. The site is vacant and undeveloped, located on a property zoned Agriculture outside the urban area. The proposal requires the property to be rezoned and subdivided to accommodate the proposed development.</p> <p>3.4. Historically, the site comprised of Saldanha Granite Strandveld, an ecosystem categorised as Critically Endangered in terms of the National Environmental Management: Biodiversity Act, 2004, Revised National List of Ecosystems that are Threatened and in Need of Protection, 2022.</p> <p>4. Applicable Listed Activities</p> <p>4.1. After considering the information provided in the NOI, the Directorate concurs that the proposed development constitutes the following listed activities as defined in terms of the NEMA EIA Regulations, 2014, as amended, namely:</p> <p>4.1.1. Activities 9, 24, 27 and 28 of Listing Notice 1 of the EIA Regulations, 2014 (as amended);</p> <p>4.1.2. Activities 4 and 12 of Listing Notice 3 of the EIA Regulations, 2014 (as amended).</p> <p>4.2. A Basic Assessment process must be followed in order to apply for Environmental Authorisation. Only those activities applied for shall be considered for authorisation. The Application Form must only include the applicable listed activities. The onus is on the applicant to ensure that all the applicable listed activities are applied for and assessed as part of the Basic Assessment process.</p> <p>4.3. Details regarding the bulk services infrastructure required for the proposed development has not been included in the project description in NOI. Please include these details in the project description in the pre-application draft Basic Assessment Report (“BAR”).</p>	<p>Correct.</p> <p>Correct. More detail will be provided in compliance statements.</p> <p>Noted and thanks for concur.</p> <p>Noted. Please refer to pre-application draft BAR for detail.</p> <p>Noted. Detail of bulk services infrastructure were included in the pre-application draft BAR under activity description.</p>
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		<p>5. Screening Tool, Specialist Assessments and Protocols</p> <p>5.1. This Directorate notes that the Screening Tool Report (dated 22 August 2024) has identified a number of specialist studies to be conducted. A motivation as to why certain specialist studies highlighted in the Screening Report will/will not be conducted has been provided within the Site Sensitivity Verification Report dated August 2024, included as an appendix to the NOI.</p> <p>5.2. According to the Screening Report (dated 22 August 2024), the proposed site is located within a high sensitivity area from an agricultural perspective, a high sensitivity area from an animal species perspective, a low sensitivity area from an aquatic biodiversity perspective, a low sensitivity area from an archaeological and cultural heritage perspective, a high sensitivity area from a civil aviation perspective, a low sensitivity area from a defence perspective, a medium sensitivity area from a palaeontology perspective, a medium sensitivity area from a plant species perspective, and a very high sensitivity area from a terrestrial biodiversity perspective</p> <p>5.3. The following specialist assessments were identified in the Screening Report (dated 22 August 2024):</p> <p>5.3.1. A Landscape/Visual Impact Assessment;</p> <p>5.3.2. An Archaeological and Cultural Heritage Impact Assessment;</p> <p>5.3.3. A Palaeontological Impact Assessment;</p> <p>5.3.4. A Terrestrial Biodiversity Impact Assessment;</p> <p>5.3.5. An Aquatic Biodiversity Impact Assessment;</p> <p>5.3.6. A Socio-Economic Impact Assessment;</p> <p>5.3.7. A Plant Species Assessment; and</p> <p>5.3.8. An Animal Species Impact Assessment.</p> <p>5.4. The following specialist assessments will be undertaken:</p>	<p>Correct.</p> <p>Correct.</p> <p>Correct.</p>
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	<p>5.4.1. It is understood that a Terrestrial Biodiversity Compliance Statement in terms of the Protocols will be conducted by Nicolaas Hanekom.</p> <p>5.4.2. A terrestrial plant species compliance statement will be conducted by Nicolaas Hanekom.</p> <p>5.4.3. An animal species compliance statement will be conducted by Nicolaas Hanekom.</p> <p>5.4.4. A Notice of Intent to Develop in terms of Palaeontology, Archaeological and Cultural Heritage will be sent to Heritage Western Cape for comment.</p> <p>5.5. Detail regarding traffic impacts has not been included in the NOI. Furthermore, stormwater management infrastructure forms an integral component of the proposed development. Details regarding the impacts associated with these two aspects must be included in the pre-application BAR.</p> <p>5.6. Based on the “Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation” (“the Protocols”) were published on 20 March 2020 (Government Notice No. 320 as published in Government Gazette No. 43110 on 20 March 2020) and the Protocols are applicable to your development proposal. According to the Protocols, before commencing with a specialist assessment, the current use of the land and environmental sensitivity of the site under consideration identified by the screening tool must be confirmed by undertaking site sensitivity verification.</p> <p>5.7. Furthermore, a signed copy of the specific compliance statements for each applicable environmental theme identified in paragraph 5.4. must be appended to the BAR.</p>	<p>Correct. Included in pre-application draft BAR under Appendix G.</p> <p>Noted. Will be submitted to HWC and comments included in draft BAR.</p> <p>Noted. A Traffic Impact Statement is included in the pre-application draft BAR under Appendix G and the detail included in the BAR.</p> <p>Noted. Please refer to Specialist reports for proof that the procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation” (“the Protocols”) were published on 20 March 2020 (Government Notice No. 320 as published in Government Gazette No. 43110 on 20 March 2020) and the Protocols were followed.</p> <p>Noted. Please refer to Appendix G for copies of reports for comment.</p>
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	<p>5.8. Where an assessment protocol is prescribed for one of the environmental themes included in the Protocol (for example, aquatic and terrestrial biodiversity), the specialist assessment must comply with the Protocol.</p> <p>5.9. Where a specialist assessment is required, but no specific environmental theme protocol has been prescribed, the level of assessment must be based on the findings of the site verification and must comply with Appendix 6 of the EIA Regulations, 2014 (as amended).</p> <p>5.10. Please note that should relevant commenting authorities require any additional specialist assessments, the relevant specialist assessment must be undertaken.</p> <p>6. Please note the following advice pertaining to the NOI: Consultation with State Departments/organs of state: In terms of Section 240 of the NEMA the competent authority must consult with every State Department that administers a law relating to a matter affecting the environment when the competent authority considers an application for an environmental authorisation.</p> <p>7. Content of a BAR”</p> <p>7.1. You are referred to Appendix 1 of the NEMA EIA Regulations, 2014 (as amended) for the requirements with respect to the ‘Content of basic assessment reports’.</p> <p>7.2. Please ensure the BAR contains all information requirements outlined in Appendix 1 of the EIA Regulations, 2014 (as amended) for the requirements with respect to the ‘Content of basic assessment reports’. You are advised that when undertaking the Basic Assessment process, you must take into account the Department’s Circular EADP 0028/2014 on the “One Environmental Management System” and the EIA Regulations, 2014 (as amended) as well as any other Guidelines developed by the Department.</p>	<p>Noted. Please refer to Appendix G reports for proof of compliance in terms of Terms of References and scope followed.</p> <p>Noted. Please refer to Appendix G reports for proof of compliance in terms of Terms of References and scope followed.</p> <p>Noted.</p> <p>Noted. Please refer to this report for proof.</p> <p>Noted. Please refer to pre-application draft BAR for proof of content and requirements met.</p> <p>Noted. Please refer to pre-application draft BAR for proof of content and requirements met.</p>
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	<p>7.3. The Department's Guidelines can be downloaded from the Department's website: <a href="http://www.westerncape.gov.za/eadp">www.westerncape.gov.za/eadp</a>. In particular, the guidelines that may be applicable to the development proposal include, inter alia, the following:</p> <p>7.3.1. Guideline for Environmental Management Plans (June 2005)</p> <p>7.3.2. Guideline on Public Participation (March 2013)</p> <p>7.3.3. Guideline on Alternatives (March 2013)</p> <p>7.3.4. Guideline on Need and Desirability (March 2013)</p> <p>8. Public Participation</p> <p>8.1. A Public Participation Process ("PPP") that meets the requirements of Regulation 41 of the EIA Regulations, 2014 (as amended) must be undertaken.</p> <p>8.2. The pre-application BAR must be made available to the Interested and Affected Parties ("I&amp;APs"), including all the relevant State Departments that administer laws relating to a matter affecting the environment, for comment for a minimum period of thirty (30) days.</p> <p>8.3. In terms of good environmental practice, you are encouraged to engage with State Departments and other Organs of State early in the pre-application and formal EIA process to solicit their inputs on any of their requirements to be addressed in the pre-application and formal EIA process. Please note that this does not replace the requirement of making the pre-application and formal BAR available to State Departments/Organs of State as stipulated above.</p> <p>8.4. This Department further provides the following comments:</p> <p>8.4.1. Your attention is drawn to Circular 0027 of 2021 regarding the electronic administration of EIA applications. The Directorate: Development Management (Region 1 and 2)</p>	<p>Noted. Please refer to pre-application draft BAR section on guidelines for the guidelines followed as well as EMPr.</p> <p>Noted. Please refer to this report for proof.</p> <p>Noted. Please refer to this report for proof.</p> <p>Noted. Please refer to this report for proof.</p> <p>Noted. Please refer to this report for proof.</p>
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		<p>will continue with the electronic submission of correspondence and has for this reason established a dedicated e-mail address for the submission of all correspondence to the Directorates. For the Cape Town office, the e-mail address is DEADPEIAAdmin@westerncape.gov.za.</p> <p>8.4.2. This electronic means of working is effective from 01 February 2022 and all general EIA queries, correspondence, applications, non-applications and reports must be e-mailed to the aforementioned email address.</p> <p>8.4.3. E-mail notification to I&amp;APs is strongly supported. However, other means of notification for those I&amp;APs will be required, where no e-mail addresses are available, or where the likelihood of success of this electronic correspondence is expected to be low.</p> <p>8.4.4. Where I&amp;APs are unable to access electronic copies of the draft BAR, a hard copy of the report must be made available. Alternatively, the EAP will be required to engage with I&amp;APs, with respect to alternative methods of accessing electronic copies of the pre-application BAR.</p> <p>8.4.5. It is further recommended that each document be named in the following format:</p> <p>8.4.5.1. The date of submission to this Directorate (e.g., 2023-03-01);</p> <p>8.4.5.2. The name of the compiler; the property/erf no.; and</p> <p>8.4.5.3. The type of document it is (e.g., Pre-Application Basic Assessment Report/Comments and Response Report).</p> <p>8.4.6. Kindly ensure that the pre-application BAR is submitted as a standalone document, separate to the accompanying appendices, and ensure that each one of the appendices is saved separately (in PDF format and not scanned).</p>	<p>Noted. Please refer to this report for proof.</p> <p>Noted. Please refer to this report for proof.</p> <p>Noted. Please refer to this report for proof.</p> <p>Noted. Please refer to this report for proof.</p> <p>Noted. Please refer to this report for proof.</p> <p>Noted. Please refer to this report for proof.</p>
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		<p>8.5. The following State Departments/Organs of State must be consulted during the pre-application and EIA processes:</p> <p>8.5.1. CapeNature;</p> <p>8.5.2. Western Cape Department of Agriculture;</p> <p>8.5.3. Saldanha Bay Municipality;</p> <p>8.5.4. DEA&amp;DP: Directorate: Waste Management; and</p> <p>8.5.5. DEA&amp;DP: Directorate: Pollution and Chemicals Management</p> <p>9. Confirmation of Availability of Municipal Services Confirmation of the availability of the required services from the service providers must be provided together with the BAR submitted to the Department for decision-making.</p> <p>10. Environmental Management Programme (“EMPr”)</p> <p>10.1. In accordance with Section 24N of the NEMA and Regulation 19 of the EIA Regulations, 2014 (as amended), the Department hereby requires the submission of an Environmental Management Programme (“EMPr”).</p> <p>10.2. The contents of such an EMPr must meet the requirements outlined in Section 24N (2) and (3) of the NEMA (as amended).</p> <p>10.3. The EMPr must address the potential environmental impacts of the activity throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing).</p> <p>10.4. The EMPr must be submitted together with the pre-application BAR. When compiling the EMPr, the Department’s Guideline for Environmental Management Plans (June 2005), available on the Department’s website must be considered as well as Appendix 4 of the EIA Regulations, 2014 (as amended).</p>	<p>Noted. Please refer to this report for proof.</p> <p>Noted. Will be included in final BAR before submission for a decision.</p> <p>Noted. Please refer to EMPr attached under Appendix H for more detail and proof that the EMPr meets the requirements outlined in Section 24N (2) and (3) of the NEMA (as amended).</p> <p>Noted. Please refer to EMPr attached under Appendix H for more detail on project life cycle and requirements.</p> <p>EMPr attached under Appendix H for more detail.</p>
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	<p><b>11. Need and Desirability</b></p> <p>11.1. In terms of the NEMA and the EIA Regulations, 2014 (as amended), when considering an application, the Department must take into account a number of specific considerations including, inter alia, the need for and desirability of any proposed project. As such, the need for and desirability of the proposed activity must be considered and reported on in the pre-application BAR.</p> <p>11.2. The pre-application BAR must reflect how the strategic context of the site in relation to the broader surrounding area, has been considered in addressing need and desirability. Refer to the Department’s Guideline on Need and Desirability (March 2013).</p> <p><b>12. Alternatives</b></p> <p>12.1. Please be advised that in terms of the NEMA and EIA Regulations, 2014 (as amended), the investigation of alternatives is mandatory. All alternatives identified must be determined to be feasible and reasonable. In this regard it must be noted that the Department may grant Environmental Authorisation for an alternative as if the alternative had been applied for or may grant Environmental Authorisation for the proposed project in respect of all or part of the activities applied for in the application as specified in Regulation 20 of the EIA Regulations, 2014 (as amended). Alternatives are not limited to activity alternatives, but include layout alternatives, design, operational and technology alternatives.</p> <p>12.2. You are hereby reminded that it is mandatory to investigate and assess the option of not proceeding with the proposed activity (i.e., the “No-Go” option) in addition to other alternatives identified. Every pre-application and formal EIA process must therefore identify and investigate alternatives, with feasible and reasonable alternatives to be</p>	<p>Noted. No separate need and desirability Appendix was included in the pre-application draft BAR. Need and desirability was included directly into the BAR as well as the rezoning motivation report attached under Appendix L describe all the need and desirability’s for the development.</p> <p>Noted. Was included directly into the BAR as well as the rezoning motivation report attached under Appendix L describe all the need and desirability’s for the development.</p> <p>Please refer to Alternative section for more details on alternatives. Two layout and design alternatives, and technology alternatives were assessed in Appendix J.</p> <p>Noted. No Go option was assessed in the pre-application draft BAR under Appendix J.</p>
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		<p>comparatively assessed. If, however, after identified alternatives have been investigated, no feasible and reasonable alternatives were found, no comparative assessment of alternatives, beyond the comparative assessment of the preferred alternative and the option of not proceeding, is required during the assessment. What would, however, be required in this instance is proof of the investigations undertaken, and motivation for there being no reasonable or feasible alternatives other than the preferred option and the “No-Go” option.</p> <p>13. NEMA Principles In addition to the above, you must clearly show how the proposed project complies with the principles contained in Section 2 of the NEMA and must show how the proposed project meets the requirements of sustainable development.</p> <p>14. Social and Gender Considerations You are reminded that the social context of the proposed development must always be considered. This includes the impact that the development proposal may have on the prevalence of HIV/AIDS, sexually transmitted infections (“STI”) and Tuberculosis (“TB”), as well as equity and gender related concerns.</p> <p>15. Climate Change 15.1. The pre-application BAR must report on the potential impacts on climate change. One of the objectives of the Western Cape Provincial Spatial Development Framework published by the Department is to minimise the consumption of scarce environmental resources such as water, fuel, building materials, mineral resources, electricity, and land. To this effect and as part of the efforts to reduce the effects of climate change, you must, as part of the EIA process, identify energy efficient technologies (e.g., the use of low voltage or</p>	<p>Noted. Please refer to section E for more detail.</p> <p>Noted. Please refer to Section G, socio-economic aspects for more detail.</p> <p>Noted. Please refer to Section I for more detail. It is not expected that the proposed development will contribute to climate change. Development of housing next to and inland of an urban area.</p>
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		<p>compact fluorescent lights instead of incandescent globes, maximising the use of solar heating, etc.) that could be implemented for the proposed development.</p> <p>15.2. Considering that South Africa is a water scarce country and that many catchments in the Western Cape are already water stressed, you must also consider implementing the use of water saving devices and technologies for the proposed development.</p> <p>16. General</p> <p>16.1. You are hereby advised that the pre-application BAR must contain all the information outlined in Appendix 1 of the EIA Regulations, 2014 (as amended), and must also include the information requested in this letter. Omission of any of the said information may result in the refusal of Environmental Authorisation.</p> <p>16.2. Please note that the pre-application consultation is an advisory process and does not pre-empt the outcome of any future application which may be submitted to the Department. No information provided, views expressed and/or comments made by officials during the pre-application consultation should in any way be seen as an indication or confirmation that additional information or documents will not be requested, or of the outcome of an application.</p> <p>17. It is prohibited in terms of the NEMA to commence with a Listed Activity without a relevant Environmental Authorisation from the Competent Authority. Non-compliance in terms of the prohibition must be referred to the Environmental Law Enforcement Directorate of the Department for possible prosecution. The penalty for a person convicted of an offence in terms of the above is a fine not exceeding R10 000 000 or imprisonment for not more than 10 years, or both such fine and such imprisonment.</p>	<p>Noted. Water saving technology was assessed and included in BAR.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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		<p>18. Kindly quote the abovementioned reference number in any future correspondence regarding your pre-application process.</p> <p>19. The Department reserves the right to revise or withdraw its comments and request further information based on any information received.</p> <p>Your interest in the future of the environment is greatly appreciated.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
Janine Greeff   Regional Content Researcher Projects	Email dated 26/5/2025	<p>Good morning Nicolaas, I hope you are well.</p> <p>I came across a town planning notice for "proposed 214 residential erven and associated infrastructure for the Stompneus Bay IRDP Housing development on Portion 4 of the Farm Duyker Eiland No 6, St Helena Bay."</p> <p>I do not have any objections but would like to please be registered as an interested party. Please register me with the email address projects@l2b.co.za</p> <p>I follow building and construction related projects from conceptual / feasibility up until completion.</p> <p>Please can you email me a copy of the background information document or motivating memorandum or any other documents or reports for this project.</p> <p>Please can you also provide me with the below.</p> <ul style="list-style-type: none"> <li>- Client Company Name: ?</li> <li>- EIA Company Name: Enviro-EAP</li> <li>- Town Planning Company Name: ?</li> <li>- Developer Company Name: ?</li> </ul> <p>Thank you.</p>	<p>Good day Janine</p> <p>Email and request for registration noted and confirmed that you are registered as an interested and affected party and will receive the report and appendixes for comment. The application is the Saldanha Bay Municipality in terms of housing provision.</p>
Chaiperson: St Helena Bay Business Chamber	Email dated 10/6/2025	<p>Good day</p> <p>I'm hereby requesting information and documents reflecting the posted document at the proposed Stompneusbaai</p>	<p>Good day</p>

	Email dated 12/6/2025	development in the area of the Vredenburg Road, St Helena Bay Main Road. Hi there The reference number stated at the top of the PDF document you send <b>does not exist</b> on the page linked in the first paragraph. Can you please provide us with the correct item on that page.	As per email request below please find attached an electronic copy of the site notice placed as requested.  This is to confirm receipt of your email. Not sure what is meant by the item that is referred to. If I am correct, then it is the pre-application draft Basic Assessment report and its Appendixes. As highlighted in the text, the registered Interested and Affected Parties will receive a email when ready with link as well as notification that it is available on the website to download for 30 days comment.  I therefore have registered you as an Interested and Affected party and as soon as the documents are ready, I will send an email to inform you and of the 30 days commenting period.
Leani Klopper	Email dated 21/6/2025	proposed RDP housing development is being planned by the Saldanha Bay Municipality for the area at the corner of St Helena Bay Main Road and Vredenburg Road, extending behind the area known locally as Smartie Town.	Good day  This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.
Anton Knoetze	Email dated 22/6/2025	Please include me as a interested party.  Regards Anton Knoetze	Good day  This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.
Steph Bekker	Email dated 22/6/2025	SITE NOTICE DATED 23 May tot.	Good day

	<p>23 June 202y 357kgistalon. parial  APPLICATION IN TERMS OF THE NEMA EIA REGULATIONS, 2014 (AS AMENDED) DEA&amp;DP REFERENCE NUMBER 16/3/3/6/7/1/F4/26/3178/24</p> <p>Notice of a Public Participation Process (PPP) is hereby given in terms the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended). This notice also serves to Inform the public that a draft Basic Environmental Impact Assessment process will be followed and that the draft report and its Appendixes for the Application will be available for public comment on our website: <a href="https://enviro-eap.co.za/public-participation/">https://enviro-eap.co.za/public-participation/</a>. When landing on the Public Participation Page on the website please scroll down until you locate the project title as indicated above (valid for full duration of 30 day commenting period). TAKE NOTE THIS WILL ONLY BE AVAILABLE ON THE WEBSITE WHEN YOU AS REGISTERED INTERESTED AND AFFECTED PARTY GET NOTIFICATION FROM ENVIRO-EAP THAT IT IS AVAILABLE. Notice is given of the public participation process commenced by the Saldanha Bay Municipality for the proposed Stompneus Bay Integrated Residential Development Programme ("IRDP") housing development and associated infrastructure on portion 4 of farm Duyker Eiland no. 6, St. Helena Bay. Location: Access will be directly off of Main Road, Stompneus bay and Stompneus Vredenburg road. Listed Activities: The application process for Environmental Authorization will follow a Basic Environmental Impact Assessment process. The proposed development constitutes Listed Activities 9, 24, 27 and 28 of Listing Notice 1 and Activities 4 and 12 of Listing Notice 3 of the EIA Regulations,</p>	<p>This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.</p>
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Pierre de Villiers	Email dated 3/7/2025	<p>Good day          Re. RDP housing development in St Helena Bay. Please forward me the documents for registration.          Many thanks and kind regards          Pierre de Villiers</p>	<p>Good day          This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.</p>
Michelle Sutherland	Email dated 3/7/2025	<p>Hi          Please register me as an interested and affected party.</p>	<p>Good day</p>

		Regards	This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.
Fiona Macduff	Email dated 3/7/2025	Good morning,  I would like to register as an interested party.	Good day  This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.
Rachelle Seymore	Email dated 3/7/2025	Planned RDP housing at stompneusbay.  Good day  Please register me as an interested and affected party with regards to this planned development.	Good day  This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.
Hamilton / Pam Macmillan	Email dated 3/7/2025	Good evening  Please can I register for information regarding  <b>RDP housing development</b> which is being planned by the Saldanha Bay Municipality for the area at the corner of <b>St Helena Bay Main Road and Vredenburg Road.</b>	Good day  This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.

Graham & Jonelle Priest	Email dated 4/7/2025	Please register me as an interested and affected party for the St Helena RDP housing project which is proposed for behind Smartie Town.	Good day  This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.
Martie Eksteen	Email dated 4/7/2025	Good day  Can you please register me as An Interested and Affected Party.  Thank you!  Have a great day!	Good day  This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.
John Evans	Email dated 5/7/2025	On Sat, 05 Jul 2025 at 08:09, John Evans <evansjohne6@gmail.com> wrote: Interested and affected party. Please include me on notifications.	Good day  This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.
S.M. Rust	Email dated 9/7/2025	Good day I wish to be register for info on this project by the SBM. Thank you	Good day

			This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.
Lazarus Joseph	Email dated 14/7/2025	<p>Good day</p> <p>Please register me as interested party in the proposed RDP housing development planned by the Saldanha Bay Municipality at the corner of St Helena Bay Main Road and Vredenburg Road.</p>	<p>Good day</p> <p>This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.</p>
Bosch, Malcolm	Email dated 23/7/2025	<p>Good day</p> <p>Please register Malcolm Bosch, property owner at 71 Markus Crescent Lampiesbaai as an interested and affected party regarding the proposed RDP housing development in Stompneus Village, St Helena Bay.</p>	<p>Good day</p> <p>This is to acknowledge your email and to confirm that you are registered as an Interested and Affected Party. Once the Basic Assessment report and its Appendixes are ready you will be informed of it via email and how to access the reports and comment period.</p>
Martie Eksteen <martie.aluminium@prinro.co.za>	EMAIL 1/9/2025	<p>Good afternoon Nicolaas</p> <p>Thanks for the email. I acknowledge receipt.</p> <p>Sorry if this is a stupid question, but when is the houses planned to be built in Stompneusbay and can we provide quotes for this project?</p>	<p>Good day Martie</p> <p>Apologies but I cannot help with your question. I am not involved with the construction and building of houses. Best is to contact municipality who control this process.</p>

		Have a great afternoon!	
Department of Environmental Affairs and Development Planning Saa-rah Adams Directorate: Development Management, Region 1	Letter dated 4 SEPTEMBER 2024	<p>ACKNOWLEDGEMENT OF RECEIPT OF THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT (“BAR”) FOR THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME (“IRDP”) HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON PORTION 4 OF FARM DUYKER EILAND NO. 6, ST. HELENA BAY.</p> <p>1. The pre-application draft BAR and associated documents dated and received by this Department via electronic mail correspondence on 25 August 2025, refers.</p> <p>2. This letter serves as an acknowledgement of receipt of the aforementioned documents by this Department.</p> <p>3. Please note that this Department will consider the pre-application draft BAR and provide comment within the prescribed 30-day period.</p> <p>4. Please note that it is an offence in terms of Section 49A(1)(a) of the NEMA for a person to commence with a listed activity unless the Competent Authority has granted an environmental authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.</p> <p>5. This Department reserves the right to revise or withdraw any comments or request further information from you based on any information received.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

<p>Department of Water and Sanitation Z. Magodla</p>	<p>10 September 2025</p>	<p>THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME- HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON PORTION 4 OF FARM DUYSKER EILAND NO. 6, ST. HELENA BAY</p> <p>Reference is made to the above-mentioned document dated July 2025 with DEA&amp;DP Reference Number: 16/3/3/6/7/1/F4/26/3178/24, prepared by Enviro-EAP (Pty) Ltd on behalf of Saldanha Bay Local Municipality.</p> <p>This Department has perused the submitted documents and has the following comments:</p> <ol style="list-style-type: none"> <li>1. According to the report and cape farm mapper “there are no water courses or aquatic biodiversity features on site or in close proximity to the site”. Therefore, the proposed development is not located within the regulated area of a watercourse as defined in Government Gazette Notice No. 4167 dated 08 December 2023. Further analysis in terms of Section 22, permissible water use of the National Water Act, 1998 (Act No. 36 of 1998) (NWA) is not applicable.</li> <li>2. The engineering report confirms that bulk municipal services (water supply and sanitation services) will be made available by installing additional internal pipelines to connect to the existing networks to supply for the proposed development. A signed agreement and confirmation from the relevant municipality (Saldanha Bay Municipality), confirming capacity and capability to rendering these services must be submitted to this Department.</li> <li>3. Please note that no abstraction, pumping or storage of both surface and groundwater may occur without authorisation from this Department, unless it is Schedule 1 or Existing Lawful use as described in the NWA.</li> </ol>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. Correct. Reported as such and site visit confirm that there are no water courses or aquatic biodiversity features on site or in close proximity to the site.</p> <p>Noted. Correct.</p> <p>Correct.</p> <p>Noted. Confirmation of availability of services will be included in final BAR.</p> <p>Noted. No abstraction, pumping or storage of both surface and groundwater is planned or proposed.</p>
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<p>Department of Environmental Affairs and Development Planning Saa-rah Adams Directorate: Development Management, Region 1</p>	<p>30 SEPTEMBER 2025</p>	<p>COMMENT ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT (“BAR”) FOR THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME (“IRDP”) HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON PORTION 4 OF FARM DUYKER EILAND NO. 6, ST. HELENA BAY.</p> <p>1. The pre-application draft BAR and associated documents dated and received by this Department via electronic mail correspondence on 25 August 2025 and this Directorate’s acknowledgement thereof dated 4 September 2025, refer.</p> <p>2. The Directorate’s comments on the pre-application BAR are as follows:</p> <p>2.1. Project description</p> <p>2.1.1. The proposed development entails the establishment of approximately 214 residential erven and associated</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Correct.</p>



		<p>motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity; and (c) is submitted together with the relevant assessment report prepared in accordance with the requirements of the Environmental Impact Assessment Regulations<sup>1</sup> (EIA Regulations.)”</p> <p>2.2.2. Prior to commencing with a specialist assessment, the current use of the land and the potential environmental sensitivity of the site under consideration as identified by the screening tool must be confirmed by undertaking a site sensitivity verification. The SSV Report dated July 2025 (signed 22 August 2024) compiled by the EAP does not meet the requirements of the Protocols. On page 4 of the SSV Report, Table 2: EAP Findings that either Confirms or Disputes the Environmental Sensitivity as Identified by the DEA Screening Tool, makes reference to “EAP Evidence” stating a “Site Visit”, and it is assumed that a site visit was undertaken, however, the rest of the report makes no reference to this site visit, when it was undertaken and there is no photographic record included to verify this claim.</p> <p>2.2.3. The site sensitivity verification must be undertaken and the SSV Report must be revised to record an accurate verification of the current status of the environmental aspects on site.</p> <p>2.2.4. Where an assessment protocol is prescribed for one of the environmental themes included in the Protocol (for example, aquatic and terrestrial biodiversity), the specialist assessment must comply with the Protocol.</p> <p>2.2.5. Where a specialist assessment is required, but no specific environmental theme protocol has been prescribed, the level of assessment must be based on the findings of the</p>	<p>Noted.</p> <p>Noted. SSVR was revised in draft BAR.</p> <p>Noted.</p> <p>Noted. Please refer to specialist reports for methodologies used to ensure compliance with Appendix 6 of the EIA Regulations, 2014 (as amended).</p>
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		<p>site verification and must comply with Appendix 6 of the EIA Regulations, 2014 (as amended).</p> <p>2.2.6. Please note that should relevant commenting authorities require any additional specialist assessments, the relevant specialist assessment must be undertaken.</p> <p>2.3. Agricultural Impacts</p> <p>2.3.1. The Screening Tool Report dated 2 July 2025 noted a “medium” sensitivity in terms of the Agriculture Theme.</p> <p>2.3.2. Based on the Protocols, the criteria for the assessment and reporting of impacts on agricultural resources for activities requiring environmental authorisation, An applicant intending to develop an activity identified in the Scope of this schedule on a site identified by the national web-based environmental screening tool as being of “medium” or “low” sensitivity for agricultural resources and where the development footprint complies with the development limits identified in Table 1, must submit an Agricultural Compliance Statement, unless:</p> <p>a. The information gathered from the initial site sensitivity verification differs from that identified as having a “medium” or “low” agricultural sensitivity by the national web-based environmental screening tool and it is found to be of a “very high” or “high” sensitivity; or</p> <p>b. The development footprint deviates from any of the allowable development limits.</p> <p>2.3.3. Based on the findings of the SSV Report dated July 2025, the EAP disputes the medium sensitivity rating stating that the reason for not undertaking the specialist assessment is that the site is “no longer used for agricultural purposes”. The statement is not substantiated by any evidentiary support evidence (e.g. photographs) of the changed agricultural</p>	<p>Noted.</p> <p>Correct.</p> <p>Noted.</p> <p>Noted. Correct.</p> <p>Noted. Please take note that the SSVR was updated in the draft BAR to include substantiated by any evidentiary support evidence (e.g. photographs) of the</p>
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		<p>resource sensitivity, to verify this claim even though the site is zoned Agriculture.</p> <p>Whilst this Directorate notes the site has not been used for agricultural use for many years and is owned by the Saldanha Bay Municipality and earmarked for housing, the EAP must provide a more detailed motivation supported with site photographs.</p> <p>2.3.4. Comment must be obtained from the Western Cape Department of Agriculture in this regard.</p> <p>2.4. Animal Species Impacts</p> <p>2.4.1. The Screening Tool Report dated 2 July 2025 noted a “high” sensitivity in terms of the Animal Species Theme and identified a Animal Species Assessment as specialist assessment for inclusion in the Basic Assessment process. Based on the findings of the SSV Report dated July 2025, the EAP disputes the high sensitivity rating stating and recommends the environmental sensitivity be reduced to medium noting that an Animal Species Compliance Statement will be conducted.</p> <p>2.4.2. The Animal Species Compliance Statement (compiled by Enviro-EAP (Pty) Ltd and dated 5 July 2025) which does meet the requirements of the Protocols (viz. 3(c) The Protocol for the Assessment and Reporting of Environmental Impacts on terrestrial Animal Species). According to the Terrestrial Animal Species protocol a Terrestrial Animal Species Compliance Statement must be prepared by a suitably qualified, specialist registered with the South African Council for Natural Scientific Professionals (“SACNASP”) under one of the two fields of practice (Zoological Science or Ecological Science).</p>	<p>changed agricultural resource sensitivity, to verify this claim.</p> <p>Noted and thanks for noted that the site has not been used for agricultural purposes.</p> <p>Noted. Pre-application draft BAR send to agriculture, but no comments received. The draft BAR will again be sent for comment.</p> <p>Noted. However, as reported in the compliance statement, the whole development site is mapped low sensitivity. The high sensitivity areas mapped is on the northern edges and just outside the development footprint. Please refer to updated SSVR report and peer reviewed animal species compliance statement in draft BAR for more detail.</p> <p>Noted. However, as confirmed by the department in this comment, According to the Terrestrial Animal Species protocol a Terrestrial Animal Species Compliance Statement must be prepared by a suitably qualified, specialist registered with the South African Council for Natural Scientific Professionals (“SACNASP”) under one of the two fields of practice (Zoological Science or Ecological Science) and therefore the Professional Natural Scientist in the Ecological Science field registration meet the requirements of the protocols.</p>
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	<p>2.4.3. This Directorate acknowledges that Mr. Hanekom is registered as a Professional Natural Scientist in the Ecological Science field, however, for the purpose of meeting the requirements of the Terrestrial Animal Species Protocol, he holds only Candidate Natural Scientist status in the Zoological Science field according to the SACNASP database of registered scientists. According to SACNASP's Code of Conduct Section 2.2.1, only a Professional Natural Scientist (Pr. Sci. Nat.) is authorised to practise independently and render professional opinions in their specific field of registration without supervision. Candidate and Certificated Natural Scientists must work under the supervision of a Pr. Sci. Nat., who assumes professional accountability</p> <p>2.4.4. This Directorate further notes the EAP's motivation regarding his competency and experience in respect of the Animal Species Compliance Statement. Specialists must demonstrate theme-relevant expertise, this includes subject-specific academic qualifications and relevant field experience. This Directorate is of the view that the specialist has not adequately demonstrated that he has the requisite qualifications, expertise or experience to compile and/ or sign off the Animal Species Compliance Statement.</p> <p>2.4.5. The EAP notes the habitat requirements of the Black Harrier (<i>Aves-Circus maurus</i>) which prefers open ground with low vegetation for hunting, where it feeds on a diet comprising mainly of small mammals, especially <i>Otomys</i> and <i>Rhabdomys</i> species... at inland sites the diet shifts between small mammals to birds depending on the season. There are no photographs or reference images of the ideal habitat included in the Compliance Statement. The Compliance Statement fails to provide a sufficient baseline description of</p>	<p>Noted and thanks for acknowledge registered as a Professional Natural Scientist in the Ecological Science field. The report was done and signed of by this professional field. The candidate fields as indicated has no relevance as the report was signed off by a registered Professional Natural Scientist in the Ecological Science field. Correct. Which was the case as in responses above.</p> <p>Noted. Please refer to comments above as well as proof included in the compliance statement and CV that demonstrate theme-relevant expertise, this includes subject-specific academic qualifications and relevant field experience. However, the animal species compliance statement was peer reviewed and updated to accommodate the peer review comments. Please refer peer review updated animal species compliance statement in the draft BAR for more detail.</p> <p>Noted. Please refer peer review updated animal species compliance statement in the draft BAR for more detail.</p>
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		<p>the on-site habitat conditions to properly assess its suitability for the identified species of conservation concern.</p> <p>2.4.6. The EAP further notes that, <i>Georchus capensis</i> mounts and <i>Chersina angulata</i> were recorded during the survey. Based on this statement, it is evident that the site is a functioning terrestrial ecosystem. However, the Compliance Statement fails to describe the current vegetation structure to confirm or refute whether it constitutes “low vegetation” suitable for Black Harrier foraging. Furthermore, the report states that <i>Rhabdomys pumilio</i> (a main prey species for the Black Harrier) is "expected to occur," yet it provides no description of the habitat that supports this expectation or evidence of a prey base survey.</p> <p>2.4.7. The EAP describes the habitat requirements for breeding as, nests are shallow platform nests built on the ground, either dry or damp underfoot and not over water. Concealed by rank vegetation. This species breeds from Aug-Nov with nestlings departing approximately two months later. However, according to the Compliance Statement, the site visit was undertaken on 17 September 2025 and during this site visit, the EAP notes the species was not recorded on site and is “only likely to roam the area”.</p> <p>The EAP acknowledges the site is within a potential roaming/ foraging area, yet dismisses the impact based on the findings of a single site survey during the peak breeding season of a key Endangered species, without providing justification for why breeding is impossible. This timing issue introduces significant uncertainty and suggests the assessment is not robust enough to rule out potential impacts on the Black Harrier.</p>	<p>Noted. Please take note that the recording of certain species in terms of ecological indicators does not necessarily mean that the site is a functioning terrestrial ecosystem. For instance, these species are regularly recorded in urban areas in gardens which is not functional ecosystems. Please refer peer review updated animal species compliance statement in the draft BAR for more detail.</p> <p>Correct.</p> <p>Correct.</p> <p>Please take note that the survey was undertaken on 17 September 2024 and the error was corrected in peer review animal species compliance statement.</p> <p>Correct, take note that the specialist noted that the species was not recorded on site and is “only likely to roam the area</p> <p>Correct. Please refer peer review updated animal species compliance statement in the draft BAR for more detail. The report confirms that primary nesting habitat is not present</p>
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	<p>2.4.8. Be advised that the Compliance Statement must be undertaken by a Registered Professional Natural Scientist with the relevant expertise and experience.</p> <p>2.5. Landscape and Visual Impacts</p> <p>2.5.1. The Screening Tool Report dated 2 July 2025 identified a Landscape/Visual Impact Assessment as a specialist assessment for inclusion in the Basic Assessment process. Based on the findings of the SSV Report dated July 2025, the EAP notes that the aforementioned specialist assessment will not be undertaken, because the proposed development is located on the edge of an urban area. Although, the site is located on the edge of an urban area, the site is undeveloped and zoned Agriculture.</p> <p>2.5.2. A proposed development of this nature and scale will transform the rural character of the landscape creating a visual impact. Without acknowledging the transformation of undeveloped land, the Basic Assessment will not address the potential visual impact with adequate mitigation measures. You are required to assess the potential visual impacts in Basic Assessment Process.</p> <p>2.6. Terrestrial Biodiversity and Plant Species Impacts</p> <p>2.6.1. The Terrestrial Biodiversity Compliance Statement and Plant Species Compliance Statement dated July 2025, compiled by Enviro-EAP (Pty) Ltd, is noted.</p> <p>2.6.2. Pages 10 and 11 of the Plant Species Compliance Statement lists the pioneer plant species recorded during the site survey. The specialist then notes that none of these species are identified in the Screening Tool Report and fails to provide the threat status of the plant species identified on site. As such, the report fails to scientifically analyse the significance of these species and does not confirm whether</p>	<p>Noted. As responded above, the compliance statement was undertaken by a Registered Professional Natural Scientist (ecology) with the relevant expertise and experience.</p> <p>Noted.</p> <p>Noted. Please refer to draft BAR, which included a heritage Impact Assessment that further assessed visual impact in terms of the HIA and Heritage Western Cape Requirements.</p> <p>Correct.</p> <p>Correct.</p> <p>Correct. Noted. Please refer to updated plant species compliance statement that reference the recorded species conservation status in brackets after each species. More detail was also provided on the vegetation structure and importance.</p>
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		<p>these plants are locally endemic or of conservation concern. There is no basis to conclude that the development of the site would have a Low Negative impact with no mitigations required.</p> <p>2.6.3. Given the identified shortcomings in methodology, analysis, and justification, comment regarding the robustness of the scientific analysis, the appropriateness of the methodological approach, and the overall adequacy of the report structure, of the Terrestrial Biodiversity Compliance Statement and Plant Species Compliance Statement dated July 2025, compiled by Enviro-EAP (Pty) Ltd., must be obtained from CapeNature. The comments must be addressed prior to the submission of the formal application with this Department.</p> <p>2.7. Traffic Impacts</p> <p>2.7.1. The Traffic Impact Statement compiled by Sturgeon Consulting dated May 2024, is noted. Please ensure that the proposed associated road network described as per the recommendations by the traffic engineering specialist is included in the relevant section of the draft BAR. Any deviation from the recommendations must be addressed in the draft BAR.</p> <p>2.7.2. Comment on the findings of the report and the detailed design of the proposed main access on OP7664 must be obtained from the relevant/ responsible Road Authority at Saldanha Bay Municipality and the Western Cape: Department of Infrastructure.</p> <p>2.7.3. Please note that should any specialist study be older than two years at the time that the application for environmental authorisation is submitted to this Directorate, an updated specialist statement may be required.</p> <p>2.8. Civil Aviation Impacts</p>	<p>Noted.</p> <p>Unfortunately, CapeNature did not comment, but their comment will again be requested during draft BAR.</p> <p>Noted. The proposed associated road network was described as per the recommendations by the traffic engineering specialist is included in the relevant section of the draft BAR. Any deviation from the recommendations must be addressed in the draft BAR.</p> <p>Correct.</p> <p>Noted.</p>
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		<p>2.8.1. The Screening Tool Report dated 2 July 2025 noted a “high” sensitivity in terms of the Civil Aviation Theme. The specialist assessment and minimum report content requirements for impacts on civil aviation installations for activities requiring environmental authorisation, notes, that where the information gathered from the initial site sensitivity verification differs from the designation of “low” sensitivity on the screening tool and it is found to be of a “very high”, “high” or “medium” sensitivity, a Civil Aviation Compliance Statement must be submitted.</p> <p>2.8.2. Based on the findings of the SSV Report dated July 2025, the EAP disputes the high sensitivity rating stating that the reason for not undertaking the specialist assessment is that, “the proposed development is located next to an urban area and will not affect civil aviation”. The statement is not substantiated by any evidentiary support evidence I, to verify the claim that the associated civil aviation impacts is low. According to the Screening Tool Report, the reason for the sensitivity is “dangerous and restricted airspace as demarcated”. If the proposal is not expected to impact on any civil infrastructure, the SSV Report should stipulate as such.</p> <p>2.8.3. A Civil Aviation Compliance Statement must be compiled meeting the minimum report content requirements for impacts on civil aviation installations for activities requiring environmental authorisation.</p> <p>2.9. Stormwater Management Impacts</p> <p>2.9.1. The design details of the proposed stormwater management infrastructure is described on Page 11 of the pre-application draft BAR. The potential impacts of stormwater and associated impact management actions have not been adequately addressed in the pre-application BAR.</p>	<p>Correct.</p> <p>Please refer to updated SSVR report that despite the “very high”, “high” or “medium” sensitivity and therefore no compliance statement was conducted.</p> <p>Correct. Please refer to updated SSVR report that despite the “very high”, “high” or “medium” sensitivity and therefore no compliance statement was conducted.</p> <p>Noted. Please refer to draft BAR for relevant mitigation measures included in the relevant sections of the BAR and the draft EMPr.</p>
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		<p>The relevant mitigation measures must be included in the relevant sections of the BAR and the draft EMPr.</p> <p>2.9.2. It is recommended that a Stormwater Management Plan that includes details of stormwater infrastructure is developed and included in the EMPr. Comment from the relevant department within Saldanha Bay Municipality must be obtained, in this regard.</p> <p>2.10. Confirmation of Availability of Municipal Services:</p> <p>2.10.1. Confirmation of the availability of sufficient unallocated service capacity for the proposed development must be included in the BAR to be submitted as part of the formal application.</p> <p>2.11. Heritage Impacts</p> <p>2.11.1. According to the pre-application draft BAR, a Notice of Intent to Develop was submitted to Heritage Western Cape (“HWC”). Comment from HWC in terms of Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) must be obtained and included in the BAR. Please ensure that proof of the submission of the NID is included in the application for environmental authorisation.</p> <p>2.12. Environmental Management Programme (“EMPr”)</p> <p>2.12.1. Please ensure that the pre-application reference (Reference No.: 16/3/3/6/7/1/F5/25/2098/25) is included on the cover page of the EMPr.</p> <p>2.12.2. Paragraph 5.4 (Reporting Requirements) on page 18 of the EMPr refers to the Cederberg Local Municipality, which must be rectified to refer to the Saldanha Bay Municipality.</p>	<p>Noted. Please refer to draft EMPr for a Stormwater Management Plan that includes details of stormwater infrastructure.</p> <p>Noted. A confirmation of services capacity and availability was included under Appendix E.16. Eskom is the electricity supplier. An email was sent already to Eskom in 2024 already, but unfortunately Eskom did not reply or respond. Eskom will be continued to be contacted request confirmation which will then be forwarded to the department.</p> <p>Correct. HWC requested HIA which was conducted and included in BAR as Appendix.</p> <p>Noted.</p> <p>Noted. Apologies, was corrected.</p>
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		<p>2.13. Public Participation</p> <p>2.13.1. Be advised that comments from CapeNature, Western Cape Department of Infrastructure and Saldanha Bay Municipality are required, and must be included in the BAR.</p> <p>2.13.2. Please be reminded that all proof of having conducted the Public Participation Process in terms of Chapter 6 of the EIA Regulations, 2014 (as amended) must be supplied to this Department. This includes proof of the placing of the newspaper advertisement, proof of the placing of site notices and proof of the notification and engagement with Interested and Affected Parties and must be included in the BAR.</p> <p>2.13.3. You are reminded that all comments received on the pre-application BAR must be adequately addressed, responded to and included in the BAR submitted as part of the formal application process.</p> <p>3. It is prohibited in terms of the NEMA to commence with a Listed Activity without a relevant Environmental Authorisation from the Competent Authority. Non-compliance in terms of the prohibition must be referred to the Environmental Law Enforcement Directorate of the Department for possible prosecution. The penalty for a person convicted of an offence in terms of the above is a fine not exceeding R10 000 000 or imprisonment for not more than 10 years, or both such fine and such imprisonment.</p> <p>4. The Department reserves the right to revise or withdraw its comments and request further information based on any information received.</p> <p>Your interest in the future of the environment is greatly appreciated.</p>	<p>Noted. Please refer to this report for proof.</p> <p>Noted. Please refer to this report for proof.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
Department of Environmental Affairs and	15 MAY 2026	ACKNOWLEDGEMENT OF RECEIPT OF THE APPLICATION FORM IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) ("NEMA")	Noted.

<p>Development Planning Saa-rah Adams Directorate: Development Management, Region 1</p>		<p>AND THE ENVIRONMENTAL IMPACT ASSESSMENT (“EIA”) REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME (“IRDP”) HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON PORTION 4 OF FARM DUYKER EILAND NO. 6, STOMPNEUS BAY.</p> <p>1. The application form and associated documents dated and received by this Department via electronic mail correspondence on 4 May 2026, refers.</p> <p>2. This letter serves as an acknowledgement of receipt of the aforementioned documents by this Department.</p> <p>3. Based on the information provided, the following is noted:</p> <p>3.1. The proposed development entails the establishment of approximately 214 residential erven and associated infrastructure for the Stompneus Bay IRDP Housing Development on Portion 4 of the Farm Duyker Eiland No. 6, St. Helena Bay.</p> <p>3.2. The proposal is comprised of:</p> <p>3.2.1. 185 Residential Zone I erven (with an area of approximately 120m<sup>2</sup> each) for IRDP housing;</p> <p>3.2.2. Three Open Space I erven;</p> <p>3.2.3. One Institutional Zone I (place of public worship);</p> <p>3.2.4. One Institutional Zone II erf (creche);</p> <p>3.2.5. Internal roads within 10m road reserves, which will be approximately 5.5m and 5.0m wide; and</p> <p>3.2.6. Associated infrastructure and services.</p> <p>3.3. The total development footprint of the proposal is approximately 5.5ha.</p> <p>4. Applicable Listed Activities:</p> <p>4.1. Having considered the information contained in the Application Form, the Department concurs that the proposed development constitutes the following listed activities as</p>	<p>Noted.</p> <p>Noted.</p> <p>Correct.</p> <p>Correct.</p> <p>Noted and thanks for concur.</p>
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	<p>defined in terms of the EIA Regulations, 2014, as amended, namely:</p> <p>4.1.1. Activities 9, 24, 27 and 28 of Listing Notice 1; and</p> <p>4.1.2. Activities 4 and 12 of Listing Notice 3 of the EIA Regulations, 2014 (as amended).</p> <p>4.2. A Basic Assessment process must be followed in order to apply for Environmental Authorisation.</p> <p>You are hereby advised that only the Listed Activity applied for in terms of the EIA Regulations, 2014 (as amended) will be considered for authorisation. The onus is on the applicant to ensure that all the applicable Listed Activities are applied for and assessed as part of the Basic Assessment process. Failure to include any applicable Listed Activity may invalidate the application.</p> <p>4.3. The description of the proposed development on Pages 4, 5 and 6 of the Application Form are inconsistent. Please ensure that the description of the proposed development is consistent throughout the Application Form, associated documents and future reports. The development footprint should also be confirmed as the project description indicates the intention to subdivide and rezone an area of ±5.9ha of said portion of land for the purpose of establishing a housing project, whereas the development footprint on page 5 indicates 5.5ha.</p> <p>4.4. The Application Form does not include a Site Development Map. The EIA Regulations require that a map (i.e., a site development plan) at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; be submitted with the relevant EIA reports.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. The description of the proposed development was corrected to ensure consistency throughout the Application Form, associated documents and future reports. The application form was updated.</p> <p>Noted. The Site Development Plan was attached as Appendix B. No sensitive and no go areas was assessed and required for the development footprint as per the Site Development Plan.</p>
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	<p>4.5. In addition to this, the Locality Map does not meet the requirements as stipulated on Page v of the Application Form must be revised accordingly.</p> <p>5. Screening Tool, The Protocols, Site Sensitivity Verification Report(“SSVR”) and Specialist Assessments</p> <p>5.1. Screening Tool Report</p> <p>5.1.1. This Screening Tool Report (dated 2 April 2026) is noted. The aforementioned Screening Tool Report has identified a number of specialist studies to be conducted. A motivation as to why certain specialist studies highlighted in the Screening Report will/will not be conducted has been provided in the Site Sensitivity Verification Report dated April 2026 (signed 2 May 2026), submitted with the Application Form.</p> <p>5.1.2. The following specialist assessments were identified in the Screening Tool Report (2 April 2026):</p> <p>5.1.2.1. A Landscape/ Visual Impact Assessment;</p> <p>5.1.2.2. An Archaeological and Cultural Heritage Impact Assessment;</p> <p>5.1.2.3. A Palaeontological Impact Assessment;</p> <p>5.1.2.4. A Terrestrial Biodiversity Impact Assessment;</p> <p>5.1.2.5. An Aquatic Biodiversity Impact Assessment;</p> <p>5.1.2.6. A Socio-Economic Assessment;</p> <p>5.1.2.7. A Plant Species Assessment; and</p> <p>5.1.2.8. An Animal Species Impact Assessment.</p> <p>5.2. The Protocols</p> <p>5.2.1. The “Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation” (“the Protocols”) were published on 20 March 2020 (Government Notice No. 320 as published in Government Gazette No. 43110 on 20 March</p>	<p>Noted. An updated locality Map was attached to the EA application and the same one used in the draft BAR.</p> <p>Noted.</p> <p>Noted.</p> <p>Correct.</p> <p>Noted.</p>
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		<p>2020) and the Protocols are applicable to your proposed development.</p> <p>5.2.2. Be advised that the Protocols must be complied with for every new application that is submitted after 9 May 2020.</p> <p>5.2.3. According to the Protocols, before commencing with a specialist assessment, the current use of the land and environmental sensitivity of the site under consideration identified by the screening tool must be confirmed by undertaking SSV. The outcome of the SSV has been recorded in the format of a report.</p> <p>5.3. The contents of the SSV Report dated April 2026 (signed 2 May 2026) compiled by the Environmental Assessment Practitioner (“EAP”), has reference. Based on the Site Sensitivity Verification and Minimum Report Content Requirements as described in the Procedures for Assessment an Minimum Reporting Requirements for Reporting on Identified Environmental Themes in Terms of Sections 24(5)(a) And (h) and 44 of the NEMA, when applying for Environmental Authorisation (“the Protocols”) published on 20 March 2020 (Government Notice No. 320 as published in Government Gazette No. 43110 on 20 March 2020), it states that “1.2. The site sensitivity verification must be undertaken through the use of: (a) a desk top analysis, using satellite imagery; (b) a preliminary on-site inspection; and (c) any other available and relevant information.”</p> <p>5.4. “1.3. The outcome of the site sensitivity verification must be recorded in the form of a report that-</p> <p>(a) confirms or disputes the current use of the land and the environmental sensitivity as identified</p> <p>by the screening tool, such as new developments or infrastructure, the change in vegetation</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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		<p>cover or status etc.; (b) contains a motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity; and (c) is submitted together with the relevant assessment report prepared in accordance with the requirements of the Environmental Impact Assessment Regulations (EIA Regulations.)”</p> <p>5.5. Prior to commencing with a specialist assessment, the current use of the land and the potential environmental sensitivity of the site under consideration as identified by the screening tool must be confirmed by undertaking a site sensitivity verification. The SSV Report dated April 2026 (signed 2 May 2026) compiled by the EAP does not meet the requirements of the Protocols.</p> <p>5.5.1. On page 10 of the SSV Report, Table 2: EAP Findings that either Confirms or Disputes the Environmental Sensitivity as Identified by the DEA Screening Tool, makes reference to “EAP Evidence” stating a “Site Visit”, and it is assumed that a site visit was undertaken. Page 2 of the SSV Report makes reference to a preliminary site inspection undertaken on 17 September 2024, with one photograph depicting the on-site status of the receiving environment.</p> <p>5.5.2. The SSV Report must be revised to record an accurate verification of the current status of the environmental aspects on site.</p> <p>5.6. Where an assessment protocol is prescribed for one of the environmental themes included in the Protocol (for example, aquatic and terrestrial biodiversity), the specialist assessment must comply with the Protocol.</p> <p>5.7. Where a specialist assessment is required, but no specific environmental theme protocol has been prescribed, the level</p>	<p>Noted.</p> <p>Noted. The SSVR was updated and information added as per comments and included in the draft BAR.</p> <p>Correct.</p> <p>Noted. Its unclear why the department assumes that the site inspection was undertaken on 17 September 2024, as this date is reference in report and the date and time is also included on the photograph. To make it more visible the date was highlight in bold in the updated SSVR.</p> <p>Noted. The SSVR was updated and information added as per comments and included in the draft BAR.</p> <p>Noted.</p>
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	<p>of assessment must be based on the findings of the site verification and must comply with Appendix 6 of the EIA Regulations, 2014 (as amended).</p> <p>5.8. Please note that should relevant commenting authorities require any additional specialist assessments, the relevant specialist assessment must be undertaken.</p> <p>5.9. The Screening Tool Report dated 2 April 2026 noted a “medium” sensitivity in terms of the Agriculture Theme. The dispute of the requirement to undertake an Agricultural Impact Assessment appears to rely on the assumption that, as the site is not used for agricultural purposes, the specialist assessment is not required. This reasoning is unclear and not substantiated. The SSVR must identify the specific sensitivities or risk indicators that triggered this requirement and provide a substantiated rationale, as to why it is not applicable to the site. For example, photographs, infographics, historical aerial imagery which demonstrates the site was not used for agricultural purposes on or after 1 April 1998 regarding the proposed change to the agricultural resource sensitivity, to verify this claim even though the site is zoned Agriculture I. Whilst this Directorate notes the site has not been used for agricultural use for many years and is owned by the Saldanha Bay Municipality and earmarked for housing, the SSV Report must be revised to include a more detailed motivation.</p> <p>5.10. The Screening Tool Report identified a Landscape/Visual Impact Assessment, an Archaeological and Cultural Heritage Impact Assessment and a Palaeontology Impact Assessment must be undertaken as specialist assessments for inclusion in the Basic Assessment process. Based on the findings of the SSV Report and noted in Pages 8 and 9 of the Application Form in the “Reason/s for the Assessment to be Conducted or Not to be Conducted (as provided by the EAP)” section, it is noted</p>	<p>Noted. The SSVR was updated and information added as per comments and included in the draft BAR.</p> <p>Noted.</p> <p>Correct. The SSVR was updated and information added as per comments and included in the draft BAR.</p> <p>Correct.</p>
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	<p>that that a Heritage Impact Assessment (“HIA”) was undertaken where the associated impacts were assessed. The HIA will be included in the draft Basic Assessment Report.</p> <p>5.11. The Screening Tool Report noted a “high” sensitivity in terms of the Animal Species Theme and an Animal Species Assessment has been identified as a specialist assessment for inclusion in the Basic Assessment process. Based on the findings of the SSV Report, the EAP disputes the high sensitivity noting that an Animal Species Compliance Statement will be conducted by himself.</p> <p>5.12. Please be advised that in terms of the relevant Protocol the Compliance Statement must be undertaken by a SACNASP registered specialist under one of the two fields of practice (Zoological Science or Ecological Science). Please note that specialists must demonstrate theme-relevant expertise, this includes subject-specific academic qualifications and relevant field experience with the relevant expertise and experience. It is noted that Mr. Hanekom is registered in Ecological Science, but is a Candidate Scientist in the field of Zoological Science. Only a Professional Natural Scientist (Pr. Sci. Nat.) is authorised to practise independently and render professional opinions in their specific field of registration without supervision. Candidate and Certificated Natural Scientists must work under the supervision of a Pr. Sci. Nat., who assumes professional accountability.</p> <p>5.13. Therefore, the Animal Species Compliance Statement conducted by Mr. Hanekom must be peer reviewed by a SACNASP Registered Natural Scientist in the field of Zoological Sciences.</p> <p>5.14. The Screening Tool Report dated 2 July 2025 noted a “high” sensitivity in terms of the Civil Aviation Theme. The specialist assessment and minimum report content</p>	<p>Correct. The SSVR was updated and information added as per comments and included in the draft BAR.</p> <p>The animal species compliance statement was conducted by a Professional Natural Scientist in the Ecological Science field. The report was done and signed off by this professional field. The candidate fields as indicated has no relevance as the report was signed off by a registered Professional Natural Scientist in the Ecological Science field. The specialist CV further demonstrate theme-relevant expertise, this includes subject-specific academic qualifications and relevant field experience. However, the animal species compliance statement was peer reviewed and updated to accommodate the peer review comments. Please refer peer review updated animal species compliance statement in the draft BAR for more detail.</p>
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	<p>requirements for impacts on civil aviation installations for activities requiring environmental authorisation, notes, that where the information gathered from the initial site sensitivity verification differs from the designation of “low” sensitivity on the screening tool and it is found to be of a “very high”, “high” or “medium” sensitivity, a Civil Aviation Compliance Statement must be submitted.</p> <p>5.15. Based on the findings of the SSV Report dated July 2025, the EAP disputes the high sensitivity rating stating that the reason for not undertaking the specialist assessment is that “the proposed development is located next to an urban area and will not affect civil aviation”. The statement is not substantiated by any evidentiary support evidence , to verify the claim that the associated civil aviation impacts is low. According to the Screening Tool Report, the reason for the sensitivity is “dangerous and restricted airspace as demarcated”. If the proposal is not expected to impact on any civil infrastructure, the SSV Report should stipulate as such.</p> <p>5.16. The SSVR must be revised accordingly to meet the requirements in terms of the Protocols.</p> <p>5.17. Further note that should relevant commenting authorities require any additional specialist assessments, the relevant specialist assessment must be undertaken.</p> <p>6. Guidelines</p> <p>You are advised that when undertaking the Basic Assessment process, you must take into account the applicable guidelines including the guidelines developed by the Department. The Department’s guidelines can be downloaded from the Department’s website (<a href="http://westerncape.gov.za/eadp">http://westerncape.gov.za/eadp</a>). In particular, the guidelines that may be applicable to the proposed development include, inter alia, the following:</p>	<p>Correct. The SSVR was updated and information added as per comments and included in the draft BAR.</p> <p>Correct. The SSVR was updated and information added as per comments and included in the draft BAR.</p> <p>Noted. The SSVR was updated and information added as per comments and included in the draft BAR.</p> <p>Noted.</p> <p>Noted. Correct. The relevant guidelines were recorded and included in the BAR.</p>
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		<ul style="list-style-type: none"> <li>• Guideline for the Review of Specialist Input in the EIA process (June 2005);</li> <li>• Guideline for Environmental Management Plans (June 2005);</li> <li>• Guideline on Public Participation (March 2013);</li> <li>• Guideline on Alternatives (March 2013); and</li> <li>• Guideline on Need and Desirability (March 2013)</li> </ul> <p>7. BAR Requirements</p> <p>7.1. The BAR must contain all the information outlined in Appendix 1 of the EIA Regulations 2014 (as amended) and must include the information requested in this letter. Failure to submit any information prescribed in Appendix 1 of the EIA Regulations 2014 (as amended) may result in Environmental Authorisation being refused.</p> <p>7.2. This Department awaits the submission of the final BAR for decision-making, as prescribed by Regulation 19 of the EIA Regulations, 2014 (as amended). In accordance with Regulation 19 of GN No. R.982 (as amended), this Department hereby stipulates that the final BAR for decision making must be submitted to this Department within ninety (90) days from the date of receipt of the Application Form for Environmental Authorisation by this Department, calculated from 4 May 2026.</p> <p>7.3. If, however, significant changes have been made or significant new information has been added to the BAR, the applicant/ Environmental Assessment Practitioner (“EAP”) must notify this Department that an additional 50 days (i.e., 140 days from receipt of the Application Form for Environmental Authorisation) will be required for the submission of the final BAR for decision making.</p>	<p>Noted. Please refer to draft BAR for proof that the BAR contain all the information outlined in Appendix 1 of the EIA Regulations 2014 (as amended) and must include the information requested in this letter.</p> <p>Noted.</p> <p>The 90 days is calculated on 3 August 2026.</p> <p>Noted.</p>
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		<p>The additional 50 days must include a minimum commenting period of 30 days to allow registered Interested and Affected Parties (“I&amp;APs”) to comment on the revised report/additional information.</p> <p>7.4. If the final BAR for decision-making is not submitted within the prescribed timeframe, the application will lapse in terms of Regulation 45 of the EIA Regulations, 2014 (as amended) and your case file will be closed for administrative purposes, unless an extension has been granted in terms of Regulation 3(7). Should you wish to pursue the application again, a new EIA application process would have to be initiated. A new Application Form for Environmental Authorisation would have to be submitted to the Competent Authority.</p> <p>8. Public Participation Process (“PPP”)</p> <p>8.1. The BAR must be subjected to a PPP that complies with Chapter 6 of the EIA Regulations, 2014 (as amended) and must take into account any applicable Guidelines published in terms of Section 24J of the NEMA, this Department’s Circular EADP 0028/2014 on the “One Environmental Management System” and the EIA Regulations, 2014 (as amended), as well as any other guidelines developed by this Department.</p> <p>8.2. It is noted that the draft BAR has been made available to the relevant Organs of State and interested and affected parties (“I&amp;APs”) for a commenting period of 30 days and a copy of the draft BAR has been submitted to this Directorate for commenting in accordance with the requirements of Regulation 40(3) of the EIA Regulations, 2014 (as amended).</p> <p>8.3. The Department herewith provides the following comments:</p> <p>8.3.1. Your attention is drawn to Circular 0027 of 2021 regarding the electronic administration of EIA applications.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. Please refer to this report for proof.</p> <p>Noted. Please refer to this report for proof.</p> <p>Noted.</p> <p>Noted.</p>
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	<p>The Directorate: Development Management (Region 1 and 2) will continue with the electronic submission of correspondence and has for this reason established a dedicated e-mail address for the submission of all correspondence to the Directorates. For the Cape Town office, the e-mail address is DEADPEIAAdmin@westerncape.gov.za.</p> <p>8.3.2. Please ensure that where electronic copies cannot be accessed by I&amp;APs, alternative access to copies of the draft BAR are made available.</p> <p>8.3.3. E-mail notification to I&amp;APs is strongly supported. However, other means of notification for those I&amp;APs will be required, where no e-mail addresses are available, or where the likelihood of success of this electronic correspondence is expected to be low.</p> <p>8.3.4. Where I&amp;APs are unable to access electronic copies of the draft BAR, a hard copy of the report must be made available. Alternatively, the EAP will be required to engage with I&amp;APs, with respect to alternative methods of accessing electronic copies of the draft BAR.</p> <p>8.4. It is imperative that State Departments and/or Organs of State be in possession of the Reports when the EAP issues them with the notice in terms of Section 24O of the NEMA. Please note that the EAP is responsible for such consultation. Therefore, it is requested that the EAP include proof of such notification to the relevant State Departments and/or Organs of State in terms of Section 24O(2) and (3) of the NEMA in the BAR, where appropriate.</p> <p>8.5. The following State Departments and/or Organs of State must be consulted during the EIA process as part of the PPP:</p> <p>8.5.1. CapeNature;</p> <p>8.5.2. Heritage Western Cape;</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. Please refer to this report for proof.</p>
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		<p>8.5.3. Western Cape: Department of Agriculture,  8.5.4. DEA&amp;DP: Directorate: Waste Management;  8.5.5. DEA&amp;DP: Directorate: Pollution and Chemicals Management; and  8.5.6. The relevant departments within the Saldanha Bay Municipality.</p> <p>8.6. A register of I&amp;APs must be opened and maintained. The said register must be submitted to this Department. The EAP must record and respond to all comments received. The comments and responses must be captured in a 'Comments and Responses Report' and must include a description of the PPP followed. This report must be included in the public participation information attached to the final BAR to be submitted for a decision.</p> <p>9. Environmental Management Programme ("EMPr")  9.1. In accordance with Section 24N of the NEMA and Regulation 19 of the EIA Regulations 2014 (as amended), this Department hereby requires the submission of an Environmental Management Programme ("EMPr"). The contents of such an EMPr must meet the requirements outlined in Section 24N (2) and (3) of the NEMA (as amended) and Appendix 4 of the EIA Regulations 2014 (as amended).  9.2. The EMPr must address the potential environmental impacts of the proposed expansion throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing). The EMPr must be submitted together with the BAR. When compiling the EMPr, this Department's Guideline for Environmental Management Plans (June 2005), available on this Department's website: <a href="http://www.westerncape.gov.za/eadp">http://www.westerncape.gov.za/eadp</a>, must be taken into</p>	<p>Noted. Please refer to this report for proof.</p> <p>Noted. Please refer to draft EMPr for proof of contents which meet the requirements outlined in Section 24N (2) and (3) of the NEMA (as amended) and Appendix 4 of the EIA Regulations 2014 (as amended).</p> <p>Noted. Please refer to draft EMPr appended to BAR for more details.</p>
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		<p>account as well as Appendix 4 of the EIA Regulations, 2014 (as amended).</p> <p>10. Alternatives</p> <p>10.1. Be advised that in terms of the EIA Regulations, 2014 (as amended) and the NEMA the investigation of alternatives is mandatory. All alternatives identified must therefore be investigated to determine if they are feasible and reasonable. In this regard it must be noted that this Department may grant authorisation for an alternative as if it has been applied for or may grant authorisation in respect of all or part of the activity applied for as specified in Regulation 20 of the EIA Regulations, 2014 (as amended). Alternatives are not limited to activity alternatives, but include layout alternatives, design, activity, operational and technology alternatives.</p> <p>10.2. You are hereby reminded that it is mandatory to investigate and assess the option of not proceeding with the proposed activity (i.e., the “no-go” option) in addition to other alternatives identified. Every EIA process must therefore identify and investigate alternatives, with feasible and reasonable alternatives to be comparatively assessed. If, however, after having identified and investigated alternatives, no feasible and reasonable alternatives were found, no comparative assessment of alternatives, beyond the comparative assessment of the preferred alternative and the option of not proceeding, is required during the assessment. What would, however, be required in this instance is proof that the investigation was undertaken and motivation indicating that no reasonable or feasible alternatives other than the preferred option and the ‘no-go’ option exist.</p> <p>11. Exemptions</p> <p>11.1. This Department notes that you do not intend to apply for exemption in terms of the National Exemption</p>	<p>Noted. Please refer to draft BAR for more detail on alternatives and assessment of the alternatives.</p> <p>Noted. Please refer to draft BAR alternative section for no go assessment.</p> <p>Correct.</p>
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	<p>Regulations, 2014 from any of the requirements of the PPP, as stipulated in Regulation 41 of the EIA Regulations, 2014 (as amended) and that you do not intend to apply for exemption from any other provisions contained in the EIA Regulations, 2014 (as amended), the NEMA or any notice issued under the NEMA.</p> <p>11.2. Please note that should you fail to meet a requirement of the EIA Regulations, 2014 (as amended) or the NEMA and if no exemption from that provision was applied for and granted, your EIA application may be refused by this Department.</p> <p>12. Need and Desirability In terms of the EIA Regulations, 2014 (as amended), when considering an application, this Department must take into account a number of specific considerations including, inter alia, the need for and desirability of any proposed development. As such, the need for and desirability of the proposed activity must be considered and reported on in the BAR. The BAR must reflect how the strategic context of the site in relation to the broader surrounding area, has been considered in addressing need and desirability.</p> <p>13. NEMA Principles In addition to the above, you must clearly show how the proposed development complies with the principles contained in Section 2 of the NEMA and must also show how the proposed development meets the requirements of sustainable development.</p> <p>14. Social and Gender Considerations You are reminded that the social context of the proposed development must always be considered. This includes the impact that the development proposal may have on the prevalence of HIV/AIDS, Sexually Transmitted</p>	<p>Noted.</p> <p>Please refer to rezoning motivation report and BAR for more detail on need and desirability details.</p> <p>Noted. Please refer to draft bar for more detail on principles contained in Section 2 of the NEMA.</p> <p>Noted. Please refer to socio-economic section in draft BAR for more detail on HIV/AIDS, Sexually Transmitted</p>
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		<p>Infections (“STI”) and Tuberculosis (“TB”), as well as equity and gender related concerns.</p> <p>15. Climate Change The BAR must report on the potential impacts on climate change. One of the objectives of the Western Cape Provincial Spatial Development Framework published by this Department is to minimise the consumption of scarce environmental resources such as water, fuel, building materials, mineral resources, electricity, and land. To this effect and as part of the efforts to reduce the effects of climate change, you must, as part of the EIA process, identify energy efficient technologies that could be implemented for the proposed development.</p> <p>16. General 16.1. Kindly quote the abovementioned reference number in any future correspondence in respect of the application. 16.2. It is prohibited in terms of Section 24F of the NEMA for a person to commence with a Listed Activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity. Non-compliance in terms of the prohibition must be referred to this Department’s Directorate: Environmental Law Enforcement for possible prosecution. A person convicted of an offence in terms of the above is liable for a fine not exceeding R10 000 000 or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.</p> <p>17. This Directorate reserves the right to revise or withdraw its comments and request further information based on any information received. Your interest in the future of the environment is greatly appreciated.</p>	<p>Infections (“STI”) and Tuberculosis (“TB”), as well as equity and gender related concerns.</p> <p>Please refer to draft BAR on impacts on climate change. The proposed development area is not located in a risk area in terms of climate change.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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**REFERENCE:** 16/3/3/6/7/1/F4/26/3178/24  
**DATE:** 20 SEPTEMBER 2024

The Municipal Manager  
Saldanha Bay Municipality  
Private Bag X12  
VREDENBURG  
7380

**Attention: Mr. H. F. W. Mettler**

Tel: 022 701 7000  
E-mail: mun@sbm.gov.za

Dear Sir

**ACKNOWLEDGEMENT OF RECEIPT AND COMMENT ON THE NOTICE OF INTENT ("NOI") TO SUBMIT AN APPLICATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) ("NEMA") ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME ("IRDP") HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON PORTION 4 OF FARM DUYKER EILAND NO. 6, ST. HELENA BAY.**

1. The NOI and associated documents dated and received by this Department via electronic correspondence on 11 September 2024, refer.
2. This letter serves as an acknowledgement of receipt by the Department of the aforementioned documents.
3. Following review of the information submitted to this Department, the following is noted:
  - 3.1. The proposed development entails the establishment of approximately 214 residential erven and associated infrastructure for the Stompneus Bay IRDP Housing Development on Portion 4 of the Farm Duyker Eiland No. 6, St. Helena Bay.
  - 3.2. The proposal is comprised of:
    - 3.2.1. Residential zone 1 erven (with an area of approximately 120m<sup>2</sup> each) for IRDP housing;
    - 3.2.2. A place of public worship (1087m<sup>2</sup>);
    - 3.2.3. An institutional zone erf for a creche (1081m<sup>2</sup>);
    - 3.2.4. Internal roads with 10m road reserves, which will be approximately 5.5m and 5.0m wide; and
    - 3.2.5. associated infrastructure and services.
  - 3.3. The site is vacant and undeveloped, located on a property zoned Agriculture outside the urban area. The proposal requires the property to be rezoned and subdivided to accommodate the proposed development.
  - 3.4. Historically, the site comprised of Saldanha Granite Strandveld, an ecosystem categorised as Critically Endangered in terms of the National Environmental Management: Biodiversity Act, 2004, Revised National List of Ecosystems that are Threatened and in Need of Protection, 2022.

4. Applicable Listed Activities
  - 4.1. After considering the information provided in the NOI, the Directorate concurs that the proposed development constitutes the following listed activities as defined in terms of the NEMA EIA Regulations, 2014, as amended, namely:
    - 4.1.1. Activities 9, 24, 27 and 28 of Listing Notice 1 of the EIA Regulations, 2014 (as amended);
    - 4.1.2. Activities 4 and 12 of Listing Notice 3 of the EIA Regulations, 2014 (as amended).
  - 4.2. A Basic Assessment process must be followed in order to apply for Environmental Authorisation. Only those activities applied for shall be considered for authorisation. The Application Form must only include the applicable listed activities. The onus is on the applicant to ensure that all the applicable listed activities are applied for and assessed as part of the Basic Assessment process.
  - 4.3. Details regarding the bulk services infrastructure required for the proposed development has not been included in the project description in NOI. Please include these details in the project description in the pre-application draft Basic Assessment Report ("BAR").
5. Screening Tool, Specialist Assessments and Protocols
  - 5.1. This Directorate notes that the Screening Tool Report (dated 22 August 2024) has identified a number of specialist studies to be conducted. A motivation as to why certain specialist studies highlighted in the Screening Report will/will not be conducted has been provided within the Site Sensitivity Verification Report dated August 2024, included as an appendix to the NOI.
  - 5.2. According to the Screening Report (dated 22 August 2024), the proposed site is located within a high sensitivity area from an agricultural perspective, a high sensitivity area from an animal species perspective, a low sensitivity area from an aquatic biodiversity perspective, a low sensitivity area from an archaeological and cultural heritage perspective, a high sensitivity area from a civil aviation perspective, a low sensitivity area from a defence perspective, a medium sensitivity area from a palaeontology perspective, a medium sensitivity area from a plant species perspective, and a very high sensitivity area from a terrestrial biodiversity perspective.
  - 5.3. The following specialist assessments were identified in the Screening Report (dated 22 August 2024):
    - 5.3.1. A Landscape/Visual Impact Assessment;
    - 5.3.2. An Archaeological and Cultural Heritage Impact Assessment;
    - 5.3.3. A Palaeontological Impact Assessment;
    - 5.3.4. A Terrestrial Biodiversity Impact Assessment;
    - 5.3.5. An Aquatic Biodiversity Impact Assessment;
    - 5.3.6. A Socio-Economic Impact Assessment;
    - 5.3.7. A Plant Species Assessment; and
    - 5.3.8. An Animal Species Impact Assessment.
  - 5.4. The following specialist assessments will be undertaken:
    - 5.4.1. It is understood that a Terrestrial Biodiversity Compliance Statement in terms of the Protocols will be conducted by Nicolaas Hanekom.
    - 5.4.2. A terrestrial plant species compliance statement will be conducted by Nicolaas Hanekom.
    - 5.4.3. An animal species compliance statement will be conducted by Nicolaas Hanekom.
    - 5.4.4. A Notice of Intent to Develop in terms of Palaeontology, Archaeological and Cultural Heritage will be sent to Heritage Western Cape for comment.
  - 5.5. Detail regarding traffic impacts has not been included in the NOI. Furthermore, stormwater management infrastructure forms an integral component of the proposed development. Details regarding the impacts associated with these two aspects must be included in the pre-application BAR.
  - 5.6. Based on the "*Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation*" ("the Protocols") were published on 20 March 2020 (Government Notice No. 320 as published in Government Gazette No. 43110 on 20 March 2020) and the Protocols are applicable to your development proposal.

According to the Protocols, before commencing with a specialist assessment, the current use of the land and environmental sensitivity of the site under consideration identified by the screening tool must be confirmed by undertaking site sensitivity verification.

- 5.7. Furthermore, a signed copy of the specific compliance statements for each applicable environmental theme identified in paragraph 5.4. must be appended to the BAR.
  - 5.8. Where an assessment protocol is prescribed for one of the environmental themes included in the Protocol (for example, aquatic and terrestrial biodiversity), the specialist assessment must comply with the Protocol.
  - 5.9. Where a specialist assessment is required, but no specific environmental theme protocol has been prescribed, the level of assessment must be based on the findings of the site verification and must comply with Appendix 6 of the EIA Regulations, 2014 (as amended).
  - 5.10. Please note that should relevant commenting authorities require any additional specialist assessments, the relevant specialist assessment must be undertaken.
6. Please note the following advice pertaining to the NOI:  
Consultation with State Departments/organs of state:  
In terms of Section 24O of the NEMA the competent authority must consult with every State Department that administers a law relating to a matter affecting the environment when the competent authority considers an application for an environmental authorisation.
7. Content of a BAR"
    - 7.1. You are referred to Appendix 1 of the NEMA EIA Regulations, 2014 (as amended) for the requirements with respect to the 'Content of basic assessment reports'.
    - 7.2. Please ensure the BAR contains all information requirements outlined in Appendix 1 of the EIA Regulations, 2014 (as amended) for the requirements with respect to the 'Content of basic assessment reports'. You are advised that when undertaking the Basic Assessment process, you must take into account the Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations, 2014 (as amended) as well as any other Guidelines developed by the Department.
    - 7.3. The Department's Guidelines can be downloaded from the Department's website: [www.westerncape.gov.za/eadp](http://www.westerncape.gov.za/eadp). In particular, the guidelines that may be applicable to the development proposal include, inter alia, the following:
      - 7.3.1. Guideline for Environmental Management Plans (June 2005)
      - 7.3.2. Guideline on Public Participation (March 2013)
      - 7.3.3. Guideline on Alternatives (March 2013)
      - 7.3.4. Guideline on Need and Desirability (March 2013)
8. Public Participation
    - 8.1. A Public Participation Process ("PPP") that meets the requirements of Regulation 41 of the EIA Regulations, 2014 (as amended) must be undertaken.
    - 8.2. The pre-application BAR must be made available to the Interested and Affected Parties ("I&APs"), including all the relevant State Departments that administer laws relating to a matter affecting the environment, for comment for a minimum period of thirty (30) days.
    - 8.3. In terms of good environmental practice, you are encouraged to engage with State Departments and other Organs of State early in the pre-application and formal EIA process to solicit their inputs on any of their requirements to be addressed in the pre-application and formal EIA process. Please note that this does not replace the requirement of making the pre-application and formal BAR available to State Departments/Organs of State as stipulated above.
    - 8.4. This Department further provides the following comments:
      - 8.4.1. Your attention is drawn to Circular 0027 of 2021 regarding the electronic administration of EIA applications. The Directorate: Development Management (Region 1 and 2) will

continue with the electronic submission of correspondence and has for this reason established a dedicated e-mail address for the submission of all correspondence to the Directorates. For the Cape Town office, the e-mail address is [DEADPEIAAdmin@westerncape.gov.za](mailto:DEADPEIAAdmin@westerncape.gov.za).

- 8.4.2. This electronic means of working is effective from 01 February 2022 and all general EIA queries, correspondence, applications, non-applications and reports must be e-mailed to the aforementioned email address.
  - 8.4.3. E-mail notification to I&APs is strongly supported. However, other means of notification for those I&APs will be required, where no e-mail addresses are available, or where the likelihood of success of this electronic correspondence is expected to be low.
  - 8.4.4. Where I&APs are unable to access electronic copies of the draft BAR, a hard copy of the report must be made available. Alternatively, the EAP will be required to engage with I&APs, with respect to alternative methods of accessing electronic copies of the pre-application BAR.
  - 8.4.5. It is further recommended that each document be named in the following format:
    - 8.4.5.1. The date of submission to this Directorate (e.g., 2023-03-01);
    - 8.4.5.2. The name of the compiler; the property/erf no.; and
    - 8.4.5.3. The type of document it is (e.g., Pre-Application Basic Assessment Report/Comments and Response Report).
  - 8.4.6. Kindly ensure that the pre-application BAR is submitted as a standalone document, separate to the accompanying appendices, and ensure that each one of the appendices is saved separately (in PDF format and not scanned).
- 8.5. The following State Departments/Organs of State must be consulted during the pre-application and EIA processes:
- 8.5.1. CapeNature;
  - 8.5.2. Western Cape Department of Agriculture;
  - 8.5.3. Saldanha Bay Municipality;
  - 8.5.4. DEA&DP: Directorate: Waste Management; and
  - 8.5.5. DEA&DP: Directorate: Pollution and Chemicals Management
9. Confirmation of Availability of Municipal Services
- Confirmation of the availability of the required services from the service providers must be provided together with the BAR submitted to the Department for decision-making.
10. Environmental Management Programme ("EMPr")
- 10.1. In accordance with Section 24N of the NEMA and Regulation 19 of the EIA Regulations, 2014 (as amended), the Department hereby requires the submission of an Environmental Management Programme ("EMPr").
  - 10.2. The contents of such an EMPr must meet the requirements outlined in Section 24N (2) and (3) of the NEMA (as amended).
  - 10.3. The EMPr must address the potential environmental impacts of the activity throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing).
  - 10.4. The EMPr must be submitted together with the pre-application BAR. When compiling the EMPr, the Department's Guideline for Environmental Management Plans (June 2005), available on the Department's website must be considered as well as Appendix 4 of the EIA Regulations, 2014 (as amended).
11. Need and Desirability
- 11.1. In terms of the NEMA and the EIA Regulations, 2014 (as amended), when considering an application, the Department must take into account a number of specific considerations

including, inter alia, the need for and desirability of any proposed project. As such, the need for and desirability of the proposed activity must be considered and reported on in the pre-application BAR.

11.2. The pre-application BAR must reflect how the strategic context of the site in relation to the broader surrounding area, has been considered in addressing need and desirability. Refer to the Department's Guideline on Need and Desirability (March 2013).

12. Alternatives

12.1. Please be advised that in terms of the NEMA and EIA Regulations, 2014 (as amended), the investigation of alternatives is mandatory. All alternatives identified must be determined to be feasible and reasonable. In this regard it must be noted that the Department may grant Environmental Authorisation for an alternative as if the alternative had been applied for or may grant Environmental Authorisation for the proposed project in respect of all or part of the activities applied for in the application as specified in Regulation 20 of the EIA Regulations, 2014 (as amended). Alternatives are not limited to activity alternatives, but include layout alternatives, design, operational and technology alternatives.

12.2. You are hereby reminded that it is mandatory to investigate and assess the option of not proceeding with the proposed activity (i.e., the "No-Go" option) in addition to other alternatives identified. Every pre-application and formal EIA process must therefore identify and investigate alternatives, with feasible and reasonable alternatives to be comparatively assessed. If, however, after identified alternatives have been investigated, no feasible and reasonable alternatives were found, no comparative assessment of alternatives, beyond the comparative assessment of the preferred alternative and the option of not proceeding, is required during the assessment. What would, however, be required in this instance is proof of the investigations undertaken, and motivation for there being no reasonable or feasible alternatives other than the preferred option and the "No-Go" option.

13. NEMA Principles

In addition to the above, you must clearly show how the proposed project complies with the principles contained in Section 2 of the NEMA and must show how the proposed project meets the requirements of sustainable development.

14. Social and Gender Considerations

You are reminded that the social context of the proposed development must always be considered. This includes the impact that the development proposal may have on the prevalence of HIV/AIDS, sexually transmitted infections ("STI") and Tuberculosis ("TB"), as well as equity and gender related concerns.

15. Climate Change

15.1. The pre-application BAR must report on the potential impacts on climate change. One of the objectives of the Western Cape Provincial Spatial Development Framework published by the Department is to minimise the consumption of scarce environmental resources such as water, fuel, building materials, mineral resources, electricity, and land. To this effect and as part of the efforts to reduce the effects of climate change, you must, as part of the EIA process, identify energy efficient technologies (e.g., the use of low voltage or compact fluorescent lights instead of incandescent globes, maximising the use of solar heating, etc.) that could be implemented for the proposed development.

15.2. Considering that South Africa is a water scarce country and that many catchments in the Western Cape are already water stressed, you must also consider implementing the use of water saving devices and technologies for the proposed development.

16. General

16.1. You are hereby advised that the pre-application BAR must contain all the information outlined in Appendix 1 of the EIA Regulations, 2014 (as amended), and must also include the information

requested in this letter. Omission of any of the said information may result in the refusal of Environmental Authorisation.

- 16.2. Please note that the pre-application consultation is an advisory process and does not pre-empt the outcome of any future application which may be submitted to the Department. No information provided, views expressed and/or comments made by officials during the pre-application consultation should in any way be seen as an indication or confirmation that additional information or documents will not be requested, or of the outcome of an application.
17. It is prohibited in terms of the NEMA to commence with a Listed Activity without a relevant Environmental Authorisation from the Competent Authority. Non-compliance in terms of the prohibition must be referred to the Environmental Law Enforcement Directorate of the Department for possible prosecution. The penalty for a person convicted of an offence in terms of the above is a fine not exceeding R10 000 000 or imprisonment for not more than 10 years, or both such fine and such imprisonment.
18. Kindly quote the abovementioned reference number in any future correspondence regarding your pre-application process.
19. The Department reserves the right to revise or withdraw its comments and request further information based on any information received.

Your interest in the future of the environment is greatly appreciated.

Yours faithfully

**Taryn  
Dreyer**

Digitally signed by  
Taryn Dreyer  
Date: 2024.09.20  
12:56:01 +02'00'

pp **MR. ZAAHIR TOEFY**

**DIRECTORATE: DEVELOPMENT MANAGEMENT REGION 1**

Copied to:

1. N. Hanekom (Enviro-EAP)
2. N. Duarte (Saldanha Bay Municipality)
3. Andre Oosthuizen (DEA&DP: DDF)

E-mail: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

E-mail: [nazeema.duarte@sbm.gov.za](mailto:nazeema.duarte@sbm.gov.za)

E-mail: [andre.oosthuizen@westerncape.gov.za](mailto:andre.oosthuizen@westerncape.gov.za)



**Nicolaas Hanekom**

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**From:** Janine Greeff <janineg@l2b.co.za>  
**Sent:** Monday, May 26, 2025 10:51 AM  
**To:** Admin; Johmandie Pienaar; Nicolaas Hanekom  
**Subject:** Stompneus Bay IRDP Housing Development.

Good morning Nicolaas,

I hope you are well.

I came across a town planning notice for "**proposed 214 residential erven and associated infrastructure for the Stompneus Bay IRDP Housing development on Portion 4 of the Farm Duyker Eiland No 6, St Helena Bay.**"

I do not have any objections but would like to please be registered as an interested party. Please register me with the email address [projects@l2b.co.za](mailto:projects@l2b.co.za)

I follow building and construction related projects from conceptual / feasibility up until completion.

Please can you email me a copy of the background information document or motivating memorandum or any other documents or reports for this project.

Please can you also provide me with the below.

- Client Company Name: ?
- EIA Company Name: Enviro-EAP
- Town Planning Company Name: ?
- Developer Company Name: ?

Thank you.

Kind Regards

**Janine Greeff | Regional Content Researcher Projects**

T : +27 86 083 6337 | F: +27 33 343 5882 | E: [JanineG@L2B.co.za](mailto:JanineG@L2B.co.za) | W:

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**Enviro-EAP**  
Environmental Consultants



Enviro-EAP (Pty) Ltd  
Reg: 2019/439235/07  
Director: Nicolaas Hanekom  
EAP's: Johmandie Pienaar & Lauren Abrahams



Office: +27 (0) 76 963 6450  
Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)  
Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)



Postal Address:  
School Str 2  
Aguilas  
South Africa  
7287

Under the Protection of Personal Information Act, 04 of 2013 ("POPIA"), we have a general legal duty to protect information we process. Enviro-EAP (Pty) Ltd is committed to ensuring the security and protection of the personal information processed by the organization, and to provide a compliant and consistent approach to data protection. The information contained in this email and any attachments thereto may be privileged or confidential and are only intended for the exclusive use and attention of the addressed recipient. If you have received this email by mistake, please delete same and advise the sender immediately. Should you have any questions related to our POPIA compliance, please contact [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za) or you may refer to Privacy Policy on our website.

---

**From:** Chairperson: St Helena Bay Business Chamber <[chair@shbbc.co.za](mailto:chair@shbbc.co.za)>

**Sent:** Tuesday, June 10, 2025 11:09 PM

**To:** Admin <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>; Johmandie Pienaar <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>; Nicolaas Hanekom <[nicolaas@enviro-eap.co.za](mailto:nicolaas@enviro-eap.co.za)>

**Subject:** Request for document - Stompneusbaai Development

Good day

I'm hereby requesting information and documents reflecting the posted document at the proposed Stompneusbaai development in the area of the Vredenburg Road, St Helena Bay Main Road.

Regards

--



To: Nicolaas Hanekom

Subject: Re: Request for document - Stompneusbaai Development

Hi there

The reference number stated at the top of the PDF document you send **does not exist** on the page linked in the first paragraph.

Can you please provide us with the correct item on that page.

Regards

---



On 2025-06-11 07:41, Nicolaas Hanekom wrote:

Good day

As per email request below please find attached an electronic copy of the site notice placed as requested.

Vriendelike Groete / Kind regards

Nicolaas Hanekom  
Director. Enviro-EAP  
Pri Sci Nat (Reg. No. 004415)  
Ecological Science (Pri.Sci.Nat); Aquatic Science, Zoological & Conservation Science (Cand.Sci.Nat)  
Reg. EAP (EAPASA): 2020/1146  
Competent Carbon Footprint Analyst

**Contact number:** 076 963 6450  
School str 2  
Agulhas  
South Africa  
7287

## Nicolaas Hanekom

---

**From:** Nicolaas Hanekom  
**Sent:** Friday, June 13, 2025 4:26 AM  
**To:** Chaiperson: St Helena Bay Business Chamber; Johmandie Pienaar; Nicolaas Hanekom  
**Cc:** Admin  
**Subject:** RE: Request for document - Stompneusbaai Development

Good day

This is to confirm receipt of your email. Not sure what is meant by the item that is referred to. If I am correct, then it is the pre-application draft Basic Assessment report and its Appendixes. As highlighted in the text, the registered Interested and Affected Parties will receive a email when ready with link as well as notification that it is available on the website to download for 30 days comment.

I therefore have registered you as an Interested and Affected party and as soon as the documents are ready, I will send an email to inform you and of the 30 days commenting period.

Vriendelike Groete / Kind regards

Nicolaas Hanekom  
Director. Enviro-EAP  
Pri Sci Nat (Reg. No. 004415)  
Ecological Science (Pri.Sci.Nat); Aquatic Science, Zoological & Conservation Science (Cand.Sci.Nat)  
Reg. EAP (EAPASA): 2020/1146  
Competent Carbon Footprint Analyst

**Contact number:** 076 963 6450  
School str 2  
Agulhas  
South Africa  
7287



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---

**From:** Chaiperson: St Helena Bay Business Chamber  
**Sent:** Thursday, June 12, 2025 5:21 PM

**Nicolaas Hanekom**

---

**From:** Leandi Klopper <leandik6@gmail.com>  
**Sent:** Saturday, June 21, 2025 12:13 PM  
**To:** Admin; Johmandie Pienaar; Nicolaas Hanekom  
**Subject:** Re: Interested and Affected Party

**proposed RDP housing development** is being planned by the Saldanha Bay Municipality for the area at the corner of **St Helena Bay Main Road and Vredenburg Road**, extending behind the area known locally as **Smartie Town**.

On Sat, Jun 21, 2025 at 12:11 PM Leandi Klopper <[leandik6@gmail.com](mailto:leandik6@gmail.com)> wrote:

**Nicolaas Hanekom**

---

**From:** antonelizeknoetze <antonelizeknoetze@gmail.com>  
**Sent:** Sunday, June 22, 2025 6:20 PM  
**To:** Admin; Johmandie Pienaar; Nicolaas Hanekom  
**Subject:** Proposed RDP housing development

Please include me as a interested party.

Regards  
Anton Knoetze  
Lampiesbaai Erf 12178

Sent from my Galaxy

**Nicolaas Hanekom**

---

**From:** Steph Bekker <steph.bekker@yahoo.com>  
**Sent:** Sunday, June 22, 2025 9:56 PM  
**To:** Admin; Johmandie Pienaar; Nicolaas Hanekom  
**Subject:** I would like to register for more info on the following development

**SITE NOTICE DATED**

23 May tot.

23 June 202y 357kgistalon. parial

APPLICATION IN TERMS OF THE NEMA EIA REGULATIONS, 2014 (AS AMENDED) DEA&DP REFERENCE NUMBER 16/3/3/6/7/1/F4/26/3178/24

Notice of a Public Participation Process (PPP) is hereby given in terms the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended). This notice also serves to Inform the public that a draft Basic Environmental Impact Assessment process will be followed and that the draft report and its Appendixes for the Application will be available for public comment on our website: <https://enviro-eap.co.za/public-participation/>. When landing on the Public Participation Page on the website please scroll down until you locate the project title as indicated above (valid for full duration of 30 day commenting period). TAKE NOTE THIS WILL ONLY BE AVAILABLE ON THE WEBSITE WHEN YOU AS REGISTERED INTERESTED AND AFFECTED PARTY GET NOTIFICATION FROM ENVIRO-EAP THAT IT IS AVAILABLE. Notice is given of the public participation process commenced by the Saldanha Bay Municipality for the proposed Stompneus Bay Integrated Residential Development Programme ("IRDP") housing development and associated infrastructure on portion 4 of farm Duyker Eiland no. 6, St. Helena Bay.

Location: Access will be directly off of Main Road, Stompneus bay and Stompneus Vredenburg road.

Listed Activities: The application process for Environmental Authorization will follow a Basic Environmental Impact Assessment process. The proposed development constitutes Listed Activities 9, 24, 27 and 28 of Listing Notice 1 and Activities 4 and 12 of Listing Notice 3 of the EIA Regulations, 2014 (as amended).

Opportunity to participate: Interested and Affected Parties are invited to register interest for the respective application within the process, or provide written comments to Enviro-EAP within 30 days of this notice (excluding public holidays). The project title, your full name, contact details, plus indication of any direct business, financial, personal or other interest you may have in this application must please be provided and fully described. The personal information and comments provided will be included in reports to be circulated and submitted to the Competent Authority to enable informed decision-making. Also, if you choose to register as an I&AP your personal information will be made available for purposes of being informed and given access to reports and comments received. This information will be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

Contact: Nicolaas Hanekom  
30 Days registration period  
Enviro-EAP, PO Box 205, Agulhas 7287  
Tel/Cell: 076 963 6450  
23 May to 23 Sure 2025.

Thank you.

**Nicolaas Hanekom**

---

**From:** Pierre de Villiers <pmdev1965@gmail.com>  
**Sent:** Thursday, July 3, 2025 10:59 AM  
**To:** Admin; Johmandie Pienaar; Nicolaas Hanekom  
**Subject:** Registration for public participation

Good day

Re. RDP housing development in St Helena Bay. Please forward me the documents for registration.

Many thanks and kind regards

Pierre de Villiers

**Nicolaas Hanekom**

---

**From:** Michelle Sutherland <michellesutherland12@gmail.com>  
**Sent:** Thursday, July 3, 2025 11:20 AM  
**To:** Admin; Johmandie Pienaar; Nicolaas Hanekom  
**Subject:** Proposed RDP development behind Smartie Town

Hi

Please register me as an interested and affected party.

Regards


Michelle Sutherland  
079 508 2829

Untitled - Message (HTML) Search

File Message Help

Share to Teams All Apps 2025 Mark Unread Find Zoom Viva Insights

(no subject)

 Rachelle Seymore <rseymore.mackay@gmail.com>  
To: Admin; Johmandie Pienaar; Nicolaas Hanekom

Follow up. Start by Thursday, July 3, 2025. Due by Thursday, July 3, 2025.  
You replied to this message on 7/5/2025 1:41 PM.

Planned RDP housing at stompneusbay.

Good day

Please register me as an interested and effected party with regards to this planned development.

Regards  
Rachelle Seymore  
Shelley point  
062 9414 752  
[Rachelleseymore53@gmail.com](mailto:Rachelleseymore53@gmail.com)

Reply Reply All Forward


Thu 7/3/2025 8:08 PM

RDP housing development - Message (HTML) Search

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RDP housing development

 Pam Macmillan <macpam01@gmail.com>  
To: Admin; Johmandie Pienaar; Nicolaas Hanekom

Follow up. Start by Thursday, July 3, 2025. Due by Thursday, July 3, 2025.  
You replied to this message on 7/5/2025 1:40 PM.

Good evening

Please can I register for information regarding

RDP housing development which is being planned by the Saldanha Bay Municipality for the area at the corner of St Helena Bay Main Road and Vredenburg Road.

Regards  
Hamilton Macmillan

Reply Reply All Forward


Thu 7/3/2025 8:37 PM

2025-07-04: Proposed RDP Housing - Message (HTML) Search

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2025-07-04: Proposed RDP Housing

 Graham Priest <graham.priest@gmail.com>  
To: Admin; Johmandie Pienaar; Nicolaas Hanekom  
Cc: Jonelle Priest

Follow up. Start by Friday, July 4, 2025. Due by Friday, July 4, 2025.  
You replied to this message on 7/5/2025 1:39 PM.

Please register me as an interested and affected party for the St Helena RDP housing project which is proposed for behind Smartie Town.

Regards

Graham Priest  
[graham.priest@gmail.com](mailto:graham.priest@gmail.com)

Reply Reply All Forward

Fri 7/4/2025 9:38 AM

Low Cost Housing - Message (HTML)

File Message Help

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**Low Cost Housing**

Martie Eksteen <martie.aluminium@prinro.co.za>  
To: Admin; Johmandie Pienaar; Nicolaas Haneekom

Follow up. Start by Friday, July 4, 2025. Due by Friday, July 4, 2025.  
You replied to this message on 7/5/2025 1:39 PM.




Good day

Can you please register me as An Interested and Affected Party.

Thank you!

Have a great day!

Best regards

Office: +27(0) 22 100 982  
Mobile: +27(0) 22 100 982  
Email: martie.aluminium@prinro.co.za  
Website: www.prinro.co.za

Re: Proposed RDP Housing St. Helena Bay - Message (HTML)

File Message Help

Share to Teams All Apps 2025 Mark Unread Find Zoom Viva Insights

**Re: Proposed RDP Housing St. Helena Bay**

John Evans <evansjohn6@gmail.com>  
To: Admin; Johmandie Pienaar; Nicolaas Haneekom

Follow up. Start by Saturday, July 5, 2025. Due by Saturday, July 5, 2025.  
You replied to this message on 7/5/2025 1:39 PM.

On Sat, 05 Jul 2025 at 08:09, John Evans <evansjohn6@gmail.com> wrote:  
Interested and affected party. Please include me on notifications.

Interested and Affected Party - Message (HTML)

File Message Help

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**Interested and Affected Party**

Lazarus Joseph <aloepjosop@gmail.com>  
To: Admin; Johmandie Pienaar; Nicolaas Haneekom

Follow up. Start by Monday, July 14, 2025. Due by Monday, July 14, 2025.  
You replied to this message on 7/14/2025 8:33 PM.

Good day

Please register me as interested party in the proposed RDP housing development planned by the Saldanha Bay Municipality at the corner of St Helena Bay Main Road and Vredenburg Road.


Kind regards  
Lazarus Joseph  
Lamplesbaai  
St Helena Bay  
Sent from my iPad

RDP Stompneusbaai St Helenabaai - Message (HTML)

File Message Help

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**RDP Stompneusbaai St Helenabaai**

 Susan Rust <sumarust@gmail.com>  
To: Admin; Johmandie Pienaar; Nicolaas Hanekom

**Follow up.** Start by Wednesday, July 9, 2025. Due by Wednesday, July 9, 2025.  
You replied to this message on 7/14/2025 8:32 PM.

Good day  
I wish to be register for info on this project by the SBM.  
Thank you  
S.M. Rust

Reply Reply All Forward

Wed 7/9/2025 11:08 AM

## Nicolaas Hanekom

---

**From:** Nicolaas Hanekom  
**Sent:** Monday, September 1, 2025 4:24 PM  
**To:** Martie Eksteen  
**Subject:** RE: PRE-APPLICATION DRAFT BAR FOR 30 DAYS COMMENT. DEA&DP REFERENCE NUMBER: 16/3/3/6/7/1/F4/26/3178/24. THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME ("IRDP") HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE OF APPROXIMATELY 5.

Good day Martie

Apologies but I cannot help with your question. I am not involved with the construction and building of houses. Best is to contact municipality who control this process.

Vriendelike Groete / Kind regards

Nicolaas Hanekom  
Director: Enviro-EAP  
Pri Sci Nat (Reg. No. 004415)  
Ecological Science (Pri.Sci.Nat); Aquatic Science, Zoological & Conservation Science (Cand.Sci.Nat)  
Reg. EAP (EAPASA): 2020/1146  
Competent Carbon Footprint Analyst

**Contact number:** 076 963 6450  
School str 2  
Agulhas  
South Africa  
7287



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---

**From:** Martie Eksteen <martie.aluminium@prinro.co.za>  
**Sent:** Monday, September 1, 2025 1:42 PM  
**To:** Nicolaas Hanekom <nicolaas@enviro-eap.co.za>  
**Subject:** RE: PRE-APPLICATION DRAFT BAR FOR 30 DAYS COMMENT. DEA&DP REFERENCE NUMBER: 16/3/3/6/7/1/F4/26/3178/24. THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME ("IRDP") HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE OF APPROXIMATELY 5.

Good afternoon Nicolaas

Thanks for the email. I acknowledge receipt.

Sorry if this is a stupid question, but when is the houses planned to be built in Stompneusbay and can we provide quotes for this project?

Have a great afternoon!

Best regards



**PRINRO**  
ALUMINIUM (PTY) LTD

**Martie Eksteen**  
Sales Representative

Office: +27(0) 22 100 1601  
Mobile: +27(0) 69 145 4690  
E-mail: [martie.aluminium@prinro.co.za](mailto:martie.aluminium@prinro.co.za)  
Website: [www.prinro.co.za](http://www.prinro.co.za)



**From:** Nicolaas Hanekom <[nicolaas@enviro-eap.co.za](mailto:nicolaas@enviro-eap.co.za)>

**Sent:** 25 Aug 2025 14:01

**To:** [LutendoN@Dalrrd.gov.za](mailto:LutendoN@Dalrrd.gov.za); 'HOD.TransportPublicWorks@westerncape.gov.za' <[HOD.TransportPublicWorks@westerncape.gov.za](mailto:HOD.TransportPublicWorks@westerncape.gov.za)>; [westcoastdm@wcdm.co.za](mailto:westcoastdm@wcdm.co.za) <[westcoastdm@wcdm.co.za](mailto:westcoastdm@wcdm.co.za)>; 'WCDM Correspondence' <[mun@wcdm.co.za](mailto:mun@wcdm.co.za)>; [mun@sbm.gov.za](mailto:mun@sbm.gov.za); Ceoheritage <[Ceoheritage@westerncape.gov.za](mailto:Ceoheritage@westerncape.gov.za)>; Ndobeni Nelisa (BVL) <[NdobeniN2@dws.gov.za](mailto:NdobeniN2@dws.gov.za)>; Dreyer Warren <[DreyerW@dws.gov.za](mailto:DreyerW@dws.gov.za)> ([DreyerW@dws.gov.za](mailto:DreyerW@dws.gov.za)) <[dreyerw@dws.gov.za](mailto:dreyerw@dws.gov.za)>; Saliem Haider <[Saliem.Haider@westerncape.gov.za](mailto:Saliem.Haider@westerncape.gov.za)>; Arabel McClelland <[Arabel.McClelland@westerncape.gov.za](mailto:Arabel.McClelland@westerncape.gov.za)>; 'Ismat Adams' <[iadams@capenature.co.za](mailto:iadams@capenature.co.za)>; [mwheeler@capenature.co.za](mailto:mwheeler@capenature.co.za); DEADP EIA Admin <[DEADPEIAadmin@westerncape.gov.za](mailto:DEADPEIAadmin@westerncape.gov.za)>; Duarte, Nazeema <[Nazeema.Duarte@sbm.gov.za](mailto:Nazeema.Duarte@sbm.gov.za)>; 'Joy Leaner' <[Joy.Leaner@westerncape.gov.za](mailto:Joy.Leaner@westerncape.gov.za)>; [Priscilla.VanAs@westerncape.gov.za](mailto:Priscilla.VanAs@westerncape.gov.za); Saa-rah Adams <[saa-rah.adams@westerncape.gov.za](mailto:saa-rah.adams@westerncape.gov.za)>

**Cc:** Jean de Klerk (Cape Town) <[jean.dk@ixengineers.co.za](mailto:jean.dk@ixengineers.co.za)>; Nackerdien, Rashied <[Rashied.Nackerdien@sbm.gov.za](mailto:Rashied.Nackerdien@sbm.gov.za)>; Admin <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>; Lawrence, Cameron <[Cameron.Lawrence@sbm.gov.za](mailto:Cameron.Lawrence@sbm.gov.za)>; Khuselo, Luvuyo <[Luvuyo.Khuselo@sbm.gov.za](mailto:Luvuyo.Khuselo@sbm.gov.za)>; Groenewald, Ryan <[Ryan.Groenewald@sbm.gov.za](mailto:Ryan.Groenewald@sbm.gov.za)>

**Subject:** PRE-APPLICATION DRAFT BAR FOR 30 DAYS COMMENT. DEA&DP REFERENCE NUMBER: 16/3/3/6/7/1/F4/26/3178/24. THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME ("IRDP") HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE OF APPROXIMATELY 5.9HA

**AVAILABILITY OF PRE-APPLICATION DRAFT BAR FOR 30 DAYS COMMENT. THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME ("IRDP") HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE OF APPROXIMATELY 5.9HA ON PORTION 4 OF FARM DUYSKER EILAND NO. 6, ST. HELENA BAY.**

**DEA&DP REFERENCE NUMBER: 16/3/3/6/7/1/F4/26/3178/24.**

Dear Key departments and registered Interested and affected Parties. Take note that the registered Interested and Affected Parties were blind cc to protect their privacy.

This email serves as a notification of the availability of the Pre-Application Draft BAR and appendices for **30-day** commenting period. Please take note of the details below which set out: - (1) How you can access the Pre-Application Draft BAR and appendices, (2) the commenting period and deadline for the submission of comments, and (3) how to submit of comments.

The Pre-Application Draft BAR and appendices are accessible via: -

- (i) electronic download on our website at: <https://enviro-eap.co.za/public-participation/>. When landing on the Public Participation Page on the website please scroll down until you locate the project title as indicated above. **(valid for full duration of 30 day or during the full commenting period)**.
- (ii) The report and appendixes can be downloaded using sharefolder link  [Stompneus-Bay-Housing-Pre-Application-DBAR](#)

Comments on the Pre-Application Draft BAR and appendixes must be submitted to the EAP within 30 days (excluding public holidays, by not later than on or before **25 September 2025**.

Please take note that I did go onto the website and check that the report is available and that the Pre-Application Draft BAR and appendixes can be downloaded. Please don't hesitate to contact me should you have any problems accessing the documents or if you require a cd or hard copy or another electronic link in order to access the report.

**(2) COMMENTING PERIOD OF THE PRE-APPLICATION DRAFT BAR AND DEADLINE FOR COMMENTS SUBMISSION**

The commenting period of the Pre-Application Draft BAR and appendixes is **30 days EXCLUDING PUBLIC HOLIDAYS**, from the **26 August 2025** ending on the **25 September 2025**. Your comments on the report and appendixes must be provided within the regulatory 30-day commenting period or by no later than the **25/09/2025**.

**CONSULTATION WITH ORGANS OF STATE / KEY DEPARTMENTS [NEMA S240]**

To facilitate adequate consultation with State Departments that administers laws relating to a matter affecting the environment in accordance with the requirements of Section 24O of NEMA, please be advised that all registered interested and affected parties, organs of state, key departments, and/or stakeholders were [in receipt of this email] notified electronically of the availability of the Pre-Application Draft BAR and its appendixes on this date **25 August 2025, commenting period commence on 26 August 2025**. As such all RI&APs and Stakeholders are considered to be "in possession" of the Pre-Application Draft BAR and appendixes from the date of electronic notification.

**(3) SUBMISSION OF COMMENTS**

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

**Responsible EAP:** Nicolaas Hanekom

**Email:** [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

I trust the above is in order, kindly acknowledge receipt.

Vriendelike Groete / Kind regards

Nicolaas Hanekom  
Director. Enviro-EAP  
Pri Sci Nat (Reg. No. 004415)  
Ecological Science (Pri.Sci.Nat); Aquatic Science & Conservation Science (Cand.Sci.Nat)  
Reg. EAP (EAPASA): 2020/1146  
Competent Carbon Footprint Analyst

**Contact number:** 076 963 6450  
School str 2  
Agulhas  
South Africa  
7287

**REFERENCE:** 16/3/3/6/7/1/FA/26/3178/24  
**DATE OF ISSUE:** 04 SEPTEMBER 2025

The Municipal Manager  
Saldanha Bay Municipality  
Private Bag X12  
VREDENBURG  
7380

**Attention: Mr. H. F. W. Mettler**

Tel: 022 701 7000  
E-mail: [mun@sbm.gov.za](mailto:mun@sbm.gov.za)

Dear Sir

**ACKNOWLEDGEMENT OF RECEIPT OF THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT ("BAR") FOR THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME ("IRDP") HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON PORTION 4 OF FARM DUYKER EILAND NO. 6, ST. HELENA BAY.**

1. The pre-application draft BAR and associated documents dated and received by this Department via electronic mail correspondence on 25 August 2025, refers.
2. This letter serves as an acknowledgement of receipt of the aforementioned documents by this Department.
3. Please note that this Department will consider the pre-application draft BAR and provide comment within the prescribed 30-day period.
4. Please note that it is an offence in terms of Section 49A(1)(a) of the NEMA for a person to commence with a listed activity unless the Competent Authority has granted an environmental authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.
5. This Department reserves the right to revise or withdraw any comments or request further information from you based on any information received.

Yours faithfully

**Taryn  
Dreyer**  
Digitally signed  
by Taryn Dreyer  
Date: 2025.09.04  
13:12:11 +02'00'

*pp* **MR. ZAAHIR TOEFY**  
**DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)**

Copied to:

1. Mr. Nicolaas Hanekom (Enviro-EAP (Pty) Ltd)
2. N. Duarte (Saldanha Bay Municipality)
3. Mr. Andre Oosthuizen (DEA&DP: DDF)

E-mail: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)  
E-mail: [nazeema.duarte@sbm.gov.za](mailto:nazeema.duarte@sbm.gov.za)  
E-mail: [andre.oosthuizen@westerncape.gov.za](mailto:andre.oosthuizen@westerncape.gov.za)



## water & sanitation

Department:  
Water and Sanitation  
REPUBLIC OF SOUTH AFRICA

### WESTERN CAPE REGION

Private Bag X 16, Sanlamhof, 7532 / 52 Voortrekker Road, Bellville 7530  
Tel #: (021) 941 6000 Fax #: (021) 941 6077

Enquiries : Z. Magodla  
Tel No : (021) 941 6124  
Email : [magodlaz@dws.gov.za](mailto:magodlaz@dws.gov.za)  
Reference : 16/27/10GWA/8

**Attention:** Nicolaas Hanekom

Enviro-EAP (Pty) Ltd  
School Str 2  
**AGULHAS**  
7287

**Email:** [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Dear Sir

**THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME- HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON PORTION 4 OF FARM DUYKER EILAND NO. 6, ST. HELENA BAY**

Reference is made to the above-mentioned document dated July 2025 with DEA&DP Reference Number: 16/3/3/6/7/1/F4/26/3178/24, prepared by Enviro-EAP (Pty) Ltd on behalf of Saldanha Bay Local Municipality.

This Department has perused the submitted documents and has the following comments:

1. According to the report and cape farm mapper "there are no water courses or aquatic biodiversity features on site or in close proximity to the site".

Therefore, the proposed development is not located within the regulated area of a watercourse as defined in Government Gazette Notice No. 4167 dated 08 December 2023. Further analysis in terms of Section 22, permissible water use of the National Water Act, 1998 (Act No. 36 of 1998) (NWA) is not applicable.

2. The engineering report confirms that bulk municipal services (water supply and sanitation services) will be made available by installing additional internal pipelines to connect to the existing networks to supply for the proposed development.

A signed agreement and confirmation from the relevant municipality (Saldanha Bay Municipality), confirming capacity and capability to rendering these services must be submitted to this Department.

3. Please note that no abstraction, pumping or storage of both surface and groundwater may occur without authorisation from this Department, unless it is Schedule 1 or Existing Lawful use as described in the NWA.



**NATIONAL DEVELOPMENT PLAN**  
Our Future - make it work



## water & sanitation

Department:  
Water and Sanitation  
REPUBLIC OF SOUTH AFRICA

4. Please ensure that all stormwater accumulating around and within the proposed development is properly controlled and managed as stipulated in the report.
5. No surface, ground or stormwater may be polluted as a result of activities on site. In the event that pollution does occur, this Department must be informed immediately.
6. The comments issued shall not be construed as exempting the developer from compliance with the provisions of any other applicable Act, Ordinance, Regulation or By-law.
7. All the requirements of the NWA regarding water use and pollution prevention must be adhered to at all times.
8. Please note that this Department reserves the right to amend and/or add to the comments made above in the light of subsequent information received.

Please do not hesitate to contact the above office should there be any queries.

Sincerely,

**PROVINCIAL HEAD:**

**Signed by:**

**Designation:**

**Date:**

**WESTERN CAPE**

**Nelisa Ndobeni**

**Control Environmental Officer**

**10 September 2025**



**NATIONAL DEVELOPMENT PLAN**  
*Our Future - make it work*

**REFERENCE:** 16/3/3/6/7/1/F4/26/3178/24

**DATE:** 30 SEPTEMBER 2025

The Municipal Manager  
Saldanha Bay Municipality  
Private Bag X12  
VREDENBURG  
7380

**Attention: Mr. H. F. W. Mettler**

Tel: 022 701 7000

E-mail: mun@sbm.gov.za

Dear Sir

**COMMENT ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT ("BAR") FOR THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME ("IRDP") HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON PORTION 4 OF FARM DUYKER EILAND NO. 6, ST. HELENA BAY.**

1. The pre-application draft BAR and associated documents dated and received by this Department via electronic mail correspondence on 25 August 2025 and this Directorate's acknowledgement thereof dated 4 September 2025, refer.
2. The Directorate's comments on the pre-application BAR are as follows:
  - 2.1. Project description
    - 2.1.1. The proposed development entails the establishment of approximately 214 residential erven and associated infrastructure for the Stompneus Bay IRDP Housing Development on Portion 4 of the Farm Duyker Eiland No. 6, St. Helena Bay.
    - 2.1.2. The proposal is comprised of:
      - Residential zone 1 erven (with an area of approximately 120m<sup>2</sup> each) for IRDP housing;
      - A place of public worship (1087m<sup>2</sup>);
      - An institutional zone erf for a creche (1081m<sup>2</sup>);
      - Internal roads with 10m road reserves, which will be approximately 5.5m and 5.0m wide; and
      - associated infrastructure and services.
  - 2.2. Site Sensitivity Verification ("SSV") Report
    - 2.2.1. The contents of the SSV Report dated July 2025 (signed 22 August 2024) compiled by the Environmental Assessment Practitioner ("EAP"), has reference. Based on the **Site Sensitivity Verification and Minimum Report Content Requirements** as described in the *Procedures for Assessment and Minimum Reporting Requirements for Reporting on Identified Environmental Themes in Terms of Sections 24(5)(a) And (h) and 44 of the NEMA*, when applying for Environmental Authorisation ("the Protocols") published on 20 March 2020 (Government Notice No. 320 as published in Government Gazette No. 43110 on 20 March 2020), it states that "1.2. The site sensitivity verification must be undertaken through the use of: (a) a desk top analysis, using satellite imagery; (b) a preliminary on-site inspection; and (c) any other available and relevant information." "1.3. The outcome of the site sensitivity verification must be recorded in the form of a report that- (a) confirms or disputes the current use of the land and the environmental

*sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover or status etc.; (b) contains a motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity; and (c) is submitted together with the relevant assessment report prepared in accordance with the requirements of the Environmental Impact Assessment Regulations<sup>1</sup> (EIA Regulations.)”*

- 2.2.2. Prior to commencing with a specialist assessment, the current use of the land and the potential environmental sensitivity of the site under consideration as identified by the screening tool must be confirmed by undertaking a **site sensitivity verification**. The SSV Report dated July 2025 (signed 22 August 2024) compiled by the EAP does not meet the requirements of the Protocols. On page 4 of the SSV Report, *Table 2: EAP Findings that either Confirms or Disputes the Environmental Sensitivity as Identified by the DEA Screening Tool*, makes reference to “EAP Evidence” stating a “Site Visit”, and it is assumed that a site visit was undertaken, however, the rest of the report makes no reference to this site visit, when it was undertaken and there is no photographic record included to verify this claim.
  - 2.2.3. The site sensitivity verification must be undertaken and the SSV Report must be revised to record an accurate verification of the current status of the environmental aspects on site.
  - 2.2.4. Where an assessment protocol is prescribed for one of the environmental themes included in the Protocol (for example, aquatic and terrestrial biodiversity), the specialist assessment must comply with the Protocol.
  - 2.2.5. Where a specialist assessment is required, but no specific environmental theme protocol has been prescribed, the level of assessment must be based on the findings of the site verification and must comply with Appendix 6 of the EIA Regulations, 2014 (as amended).
  - 2.2.6. Please note that should relevant commenting authorities require any additional specialist assessments, the relevant specialist assessment must be undertaken.
- 2.3. Agricultural Impacts
- 2.3.1. The Screening Tool Report dated 2 July 2025 noted a “medium” sensitivity in terms of the Agriculture Theme.
  - 2.3.2. Based on the Protocols, *the criteria for the assessment and reporting of impacts on agricultural resources for activities requiring environmental authorisation, An applicant intending to develop an activity identified in the Scope of this schedule on a site identified by the national web-based environmental screening tool as being of “medium” or “low” sensitivity for agricultural resources and where the development footprint complies with the development limits identified in Table 1, must submit an Agricultural Compliance Statement, unless:*
    - a. *The information gathered from the initial site sensitivity verification differs from that identified as having a “medium” or “low” agricultural sensitivity by the national web-based environmental screening tool and it is found to be of a “very high” or “high” sensitivity; or*
    - b. *The development footprint deviates from any of the allowable development limits.*
  - 2.3.3. Based on the findings of the SSV Report dated July 2025, the EAP disputes the medium sensitivity rating stating that the reason for not undertaking the specialist assessment is that the site is “no longer used for agricultural purposes”. The statement is not substantiated by any evidentiary support evidence (e.g. photographs) of the changed agricultural resource sensitivity, to verify this claim even though the site is zoned Agriculture. Whilst this Directorate notes the site has not been used for agricultural use for many years and is owned by the Saldanha Bay Municipality and earmarked for housing, the EAP must provide a more detailed motivation supported with site photographs.

2.3.4. Comment must be obtained from the Western Cape Department of Agriculture in this regard.

2.4. Animal Species Impacts

2.4.1. The Screening Tool Report dated 2 July 2025 noted a "high" sensitivity in terms of the Animal Species Theme and identified a Animal Species Assessment as specialist assessment for inclusion in the Basic Assessment process. Based on the findings of the SSV Report dated July 2025, the EAP disputes the high sensitivity rating stating and recommends the environmental sensitivity be reduced to medium noting that an Animal Species Compliance Statement will be conducted.

2.4.2. The Animal Species Compliance Statement (compiled by Enviro-EAP (Pty) Ltd and dated 5 July 2025) which does meet the requirements of the Protocols (*viz. 3(c) The Protocol for the Assessment and Reporting of Environmental Impacts on terrestrial Animal Species*). According to the Terrestrial Animal Species protocol a *Terrestrial Animal Species Compliance Statement must be prepared by a suitably qualified, specialist registered with the South African Council for Natural Scientific Professionals ("SACNASP") under one of the two fields of practice (Zoological Science or Ecological Science)*.

2.4.3. This Directorate acknowledges that Mr. Hanekom is registered as a Professional Natural Scientist in the Ecological Science field, however, for the purpose of meeting the requirements of the Terrestrial Animal Species Protocol, he holds only Candidate Natural Scientist status in the Zoological Science field according to the SACNASP database of registered scientists. According to SACNASP's Code of Conduct Section 2.2.1, only a Professional Natural Scientist (Pr. Sci. Nat.) is authorised to practise independently and render professional opinions in their specific field of registration without supervision. Candidate and Certificated Natural Scientists **must** work under the supervision of a Pr. Sci. Nat., who assumes professional accountability

2.4.4. This Directorate further notes the EAP's motivation regarding his competency and experience in respect of the Animal Species Compliance Statement. Specialists must demonstrate theme-relevant expertise, this includes subject-specific academic qualifications and relevant field experience. This Directorate is of the view that the specialist has not adequately demonstrated that he has the requisite qualifications, expertise or experience to compile and/ or sign off the Animal Species Compliance Statement.

2.4.5. The EAP notes the habitat requirements of the Black Harrier (*Aves-Circus maurus*) which *prefers open ground with low vegetation for hunting, where it feeds on a diet comprising mainly of small mammals, especially Otomys and Rhabdomys species... at inland sites the diet shifts between small mammals to birds depending on the season*. There are no photographs or reference images of the ideal habitat included in the Compliance Statement. The Compliance Statement fails to provide a sufficient baseline description of the on-site habitat conditions to properly assess its suitability for the identified species of conservation concern.

2.4.6. The EAP further notes that, *Georychus capensis mounts and Chersina angulata were recorded during the survey*. Based on this statement, it is evident that the site is a functioning terrestrial ecosystem. However, the Compliance Statement fails to describe the current vegetation structure to confirm or refute whether it constitutes "low vegetation" suitable for Black Harrier foraging. Furthermore, the report states that *Rhabdomys pumilio* (a main prey species for the Black Harrier) is "expected to occur," yet it provides no description of the habitat that supports this expectation or evidence of a prey base survey.

2.4.7. The EAP describes the habitat requirements for breeding as, *nests are shallow platform nests built on the ground, either dry or damp underfoot and not over water. Concealed by rank vegetation. This species breeds from Aug- Nov with nestlings departing approximately two months later*. However, according to the Compliance Statement, the site visit was undertaken on 17 September 2025 and during this site visit,

the EAP notes the species was not recorded on site and is “only likely to roam the area”. The EAP acknowledges the site is within a potential roaming/ foraging area, yet dismisses the impact based on the findings of a single site survey during the peak breeding season of a key Endangered species, without providing justification for why breeding is impossible. This timing issue introduces significant uncertainty and suggests the assessment is not robust enough to rule out potential impacts on the Black Harrier.

2.4.8. Be advised that the Compliance Statement **must** be undertaken by a Registered Professional Natural Scientist with the relevant expertise and experience.

## 2.5. Landscape and Visual Impacts

2.5.1. The Screening Tool Report dated 2 July 2025 identified a Landscape/Visual Impact Assessment as a specialist assessment for inclusion in the Basic Assessment process. Based on the findings of the SSV Report dated July 2025, the EAP notes that the aforementioned specialist assessment will not be undertaken, because *the proposed development is located on the edge of an urban area*. Although, the site is located on the edge of an urban area, the site is undeveloped and zoned Agriculture.

2.5.2. A proposed development of this nature and scale will transform the rural character of the landscape creating a visual impact. Without acknowledging the transformation of undeveloped land, the Basic Assessment will not address the potential visual impact with adequate mitigation measures. You are required to assess the potential visual impacts in Basic Assessment Process.

## 2.6. Terrestrial Biodiversity and Plant Species Impacts

2.6.1. The Terrestrial Biodiversity Compliance Statement and Plant Species Compliance Statement dated July 2025, compiled by Enviro-EAP (Pty) Ltd, is noted.

2.6.2. Pages 10 and 11 of the Plant Species Compliance Statement lists the pioneer plant species recorded during the site survey. The specialist then notes that none of these species are identified in the Screening Tool Report and fails to provide the threat status of the plant species identified on site. As such, the report fails to scientifically analyse the significance of these species and does not confirm whether these plants are locally endemic or of conservation concern. There is no basis to conclude that *the development of the site would have a **Low Negative** impact with no mitigations required*.

2.6.3. Given the identified shortcomings in methodology, analysis, and justification, comment regarding the robustness of the scientific analysis, the appropriateness of the methodological approach, and the overall adequacy of the report structure, of the Terrestrial Biodiversity Compliance Statement and Plant Species Compliance Statement dated July 2025, compiled by Enviro-EAP (Pty) Ltd., must be obtained from CapeNature. The comments must be addressed prior to the submission of the formal application with this Department.

## 2.7. Traffic Impacts

2.7.1. The Traffic Impact Statement compiled by Sturgeon Consulting dated May 2024, is noted. Please ensure that the proposed associated road network described as per the recommendations by the traffic engineering specialist is included in the relevant section of the draft BAR. Any deviation from the recommendations must be addressed in the draft BAR.

2.7.2. Comment on the findings of the report and the detailed design of the proposed main access on OP7664 must be obtained from the relevant/ responsible Road Authority at Saldanha Bay Municipality and the Western Cape: Department of Infrastructure.

2.7.3. Please note that should any specialist study be older than two years at the time that the application for environmental authorisation is submitted to this Directorate, an updated specialist statement may be required.

## 2.8. Civil Aviation Impacts

- 2.8.1. The Screening Tool Report dated 2 July 2025 noted a "high" sensitivity in terms of the Civil Aviation Theme. The specialist assessment and minimum report content requirements for impacts on civil aviation installations for activities requiring environmental authorisation, notes, that where *the information gathered from the initial site sensitivity verification differs from the designation of "low" sensitivity on the screening tool and it is found to be of a "very high", "high" or "medium" sensitivity, a Civil Aviation Compliance Statement must be submitted.*
- 2.8.2. Based on the findings of the SSV Report dated July 2025, the EAP disputes the high sensitivity rating stating that the reason for not undertaking the specialist assessment is that, *"the proposed development is located next to an urban area and will not affect civil aviation"*. The statement is not substantiated by any evidentiary support evidence I, to verify the claim that the associated civil aviation impacts is low. According to the Screening Tool Report, the reason for the sensitivity is "dangerous and restricted airspace as demarcated". If the proposal is not expected to impact on any civil infrastructure, the SSV Report should stipulate as such.
- 2.8.3. A Civil Aviation Compliance Statement must be compiled meeting the *minimum report content requirements for impacts on civil aviation installations for activities requiring environmental authorisation.*

## 2.9. Stormwater Management Impacts

- 2.9.1. The design details of the proposed stormwater management infrastructure is described on Page 11 of the pre-application draft BAR. The potential impacts of stormwater and associated impact management actions have not been adequately addressed in the pre-application BAR. The relevant mitigation measures must be included in the relevant sections of the BAR and the draft EMPr.
- 2.9.2. It is recommended that a Stormwater Management Plan that includes details of stormwater infrastructure is developed and included in the EMPr. Comment from the relevant department within Saldanha Bay Municipality must be obtained, in this regard.

## 2.10. Confirmation of Availability of Municipal Services:

- 2.10.1. Confirmation of the availability of sufficient unallocated service capacity for the proposed development must be included in the BAR to be submitted as part of the formal application.

## 2.11. Heritage Impacts

- 2.11.1. According to the pre-application draft BAR, a Notice of Intent to Develop was submitted to Heritage Western Cape ("HWC"). Comment from HWC in terms of Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) must be obtained and included in the BAR. Please ensure that proof of the submission of the NID is included in the application for environmental authorisation.

## 2.12. Environmental Management Programme ("EMPr")

- 2.12.1. Please ensure that the pre-application reference (Reference No.: 16/3/3/6/7/1/F5/25/2098/25) is included on the cover page of the EMPr.
- 2.12.2. Paragraph 5.4 (Reporting Requirements) on page 18 of the EMPr refers to the Cederberg Local Municipality, which must be rectified to refer to the Saldanha Bay Municipality.

## 2.13. Public Participation

- 2.13.1. Be advised that comments from CapeNature, Western Cape Department of Infrastructure and Saldanha Bay Municipality are required, and must be included in the BAR.

- 2.13.2. Please be reminded that all proof of having conducted the Public Participation Process in terms of Chapter 6 of the EIA Regulations, 2014 (as amended) must be supplied to this Department. This includes proof of the placing of the newspaper advertisement, proof of the placing of site notices and proof of the notification and engagement with Interested and Affected Parties and must be included in the BAR.
- 2.13.3. You are reminded that all comments received on the pre-application BAR must be adequately addressed, responded to and included in the BAR submitted as part of the formal application process.
3. It is prohibited in terms of the NEMA to commence with a Listed Activity without a relevant Environmental Authorisation from the Competent Authority. Non-compliance in terms of the prohibition must be referred to the Environmental Law Enforcement Directorate of the Department for possible prosecution. The penalty for a person convicted of an offence in terms of the above is a fine not exceeding R10 000 000 or imprisonment for not more than 10 years, or both such fine and such imprisonment.
4. The Department reserves the right to revise or withdraw its comments and request further information based on any information received.

Your interest in the future of the environment is greatly appreciated.

Yours faithfully

**Taryn Dreyer**  
Digitally signed  
by Taryn Dreyer  
Date: 2025.09.30  
14:25:43 +02'00'

pp **MR. ZAAHIR TOEFY**

**DIRECTORATE: DEVELOPMENT MANAGEMENT REGION 1**

Copies to:

1. Mr. Nicolaas Hanekom (Enviro-EAP (Pty) Ltd)
2. Ms. Nazeema Duarte (Matzikama Municipality)
3. Mr. Andre Oosthuizen (DEA&DP: DDF)

E-mail: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

E-mail: [nazeema.duarte@sbm.gov.za](mailto:nazeema.duarte@sbm.gov.za)

E-mail: [andre.oosthuizen@westerncape.gov.za](mailto:andre.oosthuizen@westerncape.gov.za)

**REFERENCE:** 16/3/3/1/F4/26/3020/26

**DATE:** 15 MAY 2026

The Municipal Manager  
Saldanha Bay Municipality  
Private Bag X12  
VREDENBURG  
7380

**Attention: Mr. H. F. W. Mettler**

Tel: 022 701 7000  
E-mail: [mun@sbm.gov.za](mailto:mun@sbm.gov.za)

Dear Sir

**ACKNOWLEDGEMENT OF RECEIPT OF THE APPLICATION FORM IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) ("NEMA") AND THE ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED STOMPNEUS BAY INTEGRATED RESIDENTIAL DEVELOPMENT PROGRAMME ("IRDP") HOUSING DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON PORTION 4 OF FARM DUYKER EILAND NO. 6, STOMPNEUS BAY.**

1. The application form and associated documents dated and received by this Department via electronic mail correspondence on 4 May 2026, refers.
2. This letter serves as an acknowledgement of receipt of the aforementioned documents by this Department.
3. Based on the information provided, the following is noted:
  - 3.1. The proposed development entails the establishment of approximately 214 residential erven and associated infrastructure for the Stompneus Bay IRDP Housing Development on Portion 4 of the Farm Duyker Eiland No. 6, St. Helena Bay.
  - 3.2. The proposal is comprised of:
    - 3.2.1. 185 Residential Zone I erven (with an area of approximately 120m<sup>2</sup> each) for IRDP housing;
    - 3.2.2. Three Open Space I erven;
    - 3.2.3. One Institutional Zone I (place of public worship);
    - 3.2.4. One Institutional Zone II erf (creche);
    - 3.2.5. Internal roads within 10m road reserves, which will be approximately 5.5m and 5.0m wide; and
    - 3.2.6. Associated infrastructure and services.
  - 3.3. The total development footprint of the proposal is approximately 5.5ha.
4. Applicable Listed Activities:
  - 4.1. Having considered the information contained in the Application Form, the Department concurs that the proposed development constitutes the following listed activities as defined in terms of the EIA Regulations, 2014, as amended, namely:
    - 4.1.1. Activities 9, 24, 27 and 28 of Listing Notice 1; and
    - 4.1.2. Activities 4 and 12 of Listing Notice 3 of the EIA Regulations, 2014 (as amended).

- 4.2. A Basic Assessment process must be followed in order to apply for Environmental Authorisation. You are hereby advised that only the Listed Activity applied for in terms of the EIA Regulations, 2014 (as amended) will be considered for authorisation. The onus is on the applicant to ensure that all the applicable Listed Activities are applied for and assessed as part of the Basic Assessment process. Failure to include any applicable Listed Activity may invalidate the application.
  - 4.3. The description of the proposed development on Pages 4, 5 and 6 of the Application Form are inconsistent. Please ensure that the description of the proposed development is consistent throughout the Application Form, associated documents and future reports. The development footprint should also be confirmed as the project description indicates the intention to subdivide and rezone an area of ±5.9ha of said portion of land for the purpose of establishing a housing project, whereas the development footprint on page 5 indicates 5.5ha.
  - 4.4. The Application Form does not include a Site Development Map. The EIA Regulations require that a map (i.e., a site development plan) at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; be submitted with the relevant EIA reports.
  - 4.5. In addition to this, the Locality Map does not meet the requirements as stipulated on Page v of the Application Form must be revised accordingly.
5. Screening Tool, The Protocols, Site Sensitivity Verification Report (“SSVR”) and Specialist Assessments
- 5.1. Screening Tool Report
    - 5.1.1. This Screening Tool Report (dated 2 April 2026) is noted. The aforementioned Screening Tool Report has identified a number of specialist studies to be conducted. A motivation as to why certain specialist studies highlighted in the Screening Report will/will not be conducted has been provided in the Site Sensitivity Verification Report dated April 2026 (signed 2 May 2026), submitted with the Application Form.
    - 5.1.2. The following specialist assessments were identified in the Screening Tool Report (2 April 2026):
      - 5.1.2.1. A Landscape / Visual Impact Assessment;
      - 5.1.2.2. An Archaeological and Cultural Heritage Impact Assessment;
      - 5.1.2.3. A Palaeontological Impact Assessment;
      - 5.1.2.4. A Terrestrial Biodiversity Impact Assessment;
      - 5.1.2.5. An Aquatic Biodiversity Impact Assessment;
      - 5.1.2.6. A Socio-Economic Assessment;
      - 5.1.2.7. A Plant Species Assessment; and
      - 5.1.2.8. An Animal Species Impact Assessment.
  - 5.2. The Protocols
    - 5.2.1. The “Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation” (“the Protocols”) were published on 20 March 2020 (Government Notice No. 320 as published in Government Gazette No. 43110 on 20 March 2020) and the Protocols are applicable to your proposed development.
    - 5.2.2. Be advised that the Protocols must be complied with for every new application that is submitted after 9 May 2020.
    - 5.2.3. According to the Protocols, before commencing with a specialist assessment, the current use of the land and environmental sensitivity of the site under consideration

identified by the screening tool must be confirmed by undertaking SSV. The outcome of the SSV has been recorded in the format of a report.

- 5.3. The contents of the SSV Report dated April 2026 (signed 2 May 2026) compiled by the Environmental Assessment Practitioner ("EAP"), has reference. Based on the **Site Sensitivity Verification and Minimum Report Content Requirements** as described in the *Procedures for Assessment and Minimum Reporting Requirements for Reporting on Identified Environmental Themes in Terms of Sections 24(5)(a) And (h) and 44 of the NEMA*, when applying for Environmental Authorisation ("the Protocols") published on 20 March 2020 (Government Notice No. 320 as published in Government Gazette No. 43110 on 20 March 2020), it states that "1.2. The site sensitivity verification must be undertaken through the use of: (a) a desk top analysis, using satellite imagery; (b) **a preliminary on-site inspection** and (c) any other available and relevant information."
- 5.4. "1.3. The outcome of the site sensitivity verification must be recorded in the form of a report that (a) confirms or disputes the current use of the land and the environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, **the change in vegetation cover or status etc.**; (b) **contains a motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity**; and (c) is submitted together with the relevant assessment report prepared in accordance with the requirements of the *Environmental Impact Assessment Regulations* (EIA Regulations.)"
- 5.5. Prior to commencing with a specialist assessment, the current use of the land and the potential environmental sensitivity of the site under consideration as identified by the screening tool must be confirmed by undertaking a site sensitivity verification. The SSV Report dated April 2026 (signed 2 May 2026) compiled by the EAP does not meet the requirements of the Protocols.
  - 5.5.1. On page 10 of the SSV Report, Table 2: *EAP Findings that either Confirms or Disputes the Environmental Sensitivity as Identified by the DEA Screening Tool*, makes reference to "EAP Evidence" stating a "Site Visit", and it is assumed that a site visit was undertaken. Page 2 of the SSV Report makes reference to a preliminary site inspection undertaken on 17 September 2024, with one photograph depicting the on-site status of the receiving environment.
  - 5.5.2. The SSV Report must be revised to record an accurate verification of the current status of the environmental aspects on site.
- 5.6. Where an assessment protocol is prescribed for one of the environmental themes included in the Protocol (for example, aquatic and terrestrial biodiversity), the specialist assessment must comply with the Protocol.
- 5.7. Where a specialist assessment is required, but no specific environmental theme protocol has been prescribed, the level of assessment must be based on the findings of the site verification and must comply with Appendix 6 of the EIA Regulations, 2014 (as amended).
- 5.8. Please note that should relevant commenting authorities require any additional specialist assessments, the relevant specialist assessment must be undertaken.
- 5.9. The Screening Tool Report dated 2 April 2026 noted a "medium" sensitivity in terms of the Agriculture Theme. The dispute of the requirement to undertake an Agricultural Impact Assessment appears to rely on the assumption that, as the site is not used for agricultural purposes, the specialist assessment is not required. This reasoning is unclear and not substantiated. The SSVR must identify the specific sensitivities or risk indicators that triggered this requirement and provide a substantiated rationale, as to why it is not applicable to the site. For example, photographs, infographics, historical aerial imagery which demonstrates the site was not used for agricultural purposes on or after 1 April 1998 regarding the proposed change to the agricultural resource sensitivity, to verify this claim even though the site is zoned Agriculture 1. Whilst this Directorate notes the site has not been used for agricultural use for many years and is

owned by the Saldanha Bay Municipality and earmarked for housing, the SSV Report must be revised to include a more detailed motivation.

- 5.10. The Screening Tool Report identified a Landscape /Visual Impact Assessment, an Archaeological and Cultural Heritage Impact Assessment and a Palaeontology Impact Assessment must be undertaken as specialist assessments for inclusion in the Basic Assessment process. Based on the findings of the SSV Report and noted in Pages 8 and 9 of the Application Form in the "Reason/s for the Assessment to be Conducted or Not to be Conducted (as provided by the EAP)" section, it is noted that that a Heritage Impact Assessment ("HIA") was undertaken where the associated impacts were assessed. The HIA will be included in the draft Basic Assessment Report.
- 5.11. The Screening Tool Report noted a "high" sensitivity in terms of the Animal Species Theme and an Animal Species Assessment has been identified as a specialist assessment for inclusion in the Basic Assessment process. Based on the findings of the SSV Report, the EAP disputes the high sensitivity noting that an Animal Species Compliance Statement will be conducted by himself.
- 5.12. Please be advised that in terms of the relevant Protocol the Compliance Statement must be undertaken by a SACNASP registered specialist under one of the two fields of practice (Zoological Science or Ecological Science). Please note that specialists must demonstrate theme-relevant expertise, this includes subject-specific academic qualifications and relevant field experience with the relevant expertise and experience. It is noted that Mr. Hanekom is registered in Ecological Science, but is a Candidate Scientist in the field of Zoological Science. Only a Professional Natural Scientist (Pr. Sci. Nat.) is authorised to practise independently and render professional opinions in their specific field of registration without supervision. Candidate and Certificated Natural Scientists must work under the supervision of a Pr. Sci. Nat., who assumes professional accountability.
- 5.13. **Therefore, the Animal Species Compliance Statement conducted by Mr. Hanekom must be peer reviewed by a SACNASP Registered Natural Scientist in the field of Zoological Sciences.**
- 5.14. The Screening Tool Report dated 2 July 2025 noted a "high" sensitivity in terms of the Civil Aviation Theme. The specialist assessment and minimum report content requirements for impacts on civil aviation installations for activities requiring environmental authorisation, notes, that where the information gathered from the initial site sensitivity verification differs from the designation of "low" sensitivity on the screening tool and it is found to be of a "very high", "high" or "medium" sensitivity, a Civil Aviation Compliance Statement must be submitted.
- 5.15. Based on the findings of the SSV Report dated July 2025, the EAP disputes the high sensitivity rating stating that the reason for not undertaking the specialist assessment is that "the proposed development is located next to an urban area and will not affect civil aviation". The statement is not substantiated by any evidentiary support evidence, to verify the claim that the associated civil aviation impacts is low. According to the Screening Tool Report, the reason for the sensitivity is "dangerous and restricted airspace as demarcated". If the proposal is not expected to impact on any civil infrastructure, the SSV Report should stipulate as such.
- 5.16. **The SSVR must be revised accordingly to meet the requirements in terms of the Protocols.**
- 5.17. Further note that should relevant commenting authorities require any additional specialist assessments, the relevant specialist assessment must be undertaken.

## 6. Guidelines

You are advised that when undertaking the Basic Assessment process, you must take into account the applicable guidelines including the guidelines developed by the Department. The Department's guidelines can be downloaded from the Department's website (<http://westerncape.gov.za/eadp/>). In particular, the guidelines that may be applicable to the proposed development include, *inter alia*, the following:

- Guideline for the Review of Specialist Input in the EIA process (June 2005);
- Guideline for Environmental Management Plans (June 2005);
- Guideline on Public Participation (March 2013);
- Guideline on Alternatives (March 2013); and
- Guideline on Need and Desirability (March 2013)

## 7. BAR Requirements

- 7.1. The BAR must contain all the information outlined in Appendix 1 of the EIA Regulations 2014 (as amended) and must include the information requested in this letter. Failure to submit any information prescribed in Appendix 1 of the EIA Regulations 2014 (as amended) may result in Environmental Authorisation being refused.
- 7.2. This Department awaits the submission of the final BAR for decision-making, as prescribed by Regulation 19 of the EIA Regulations, 2014 (as amended). In accordance with Regulation 19 of GN No. R.982 (as amended), this Department hereby stipulates that the final BAR for decision-making must be submitted to this Department within ninety (90) days from the date of receipt of the Application Form for Environmental Authorisation by this Department, **calculated from 4 May 2024**.
- 7.3. If, however, significant changes have been made or significant new information has been added to the BAR, the applicant/ Environmental Assessment Practitioner ("EAP") must notify this Department that an additional 50 days (i.e., 140 days from receipt of the Application Form for Environmental Authorisation) will be required for the submission of the final BAR for decision-making. The additional 50 days must include a minimum commenting period of 30 days to allow registered Interested and Affected Parties ("I&APs") to comment on the revised report/additional information.
- 7.4. If the final BAR for decision-making is not submitted within the prescribed timeframe, the application will lapse in terms of Regulation 45 of the EIA Regulations, 2014 (as amended) and your case file will be closed for administrative purposes, unless an extension has been granted in terms of Regulation 3(7). Should you wish to pursue the application again, a new EIA application process would have to be initiated. A new Application Form for Environmental Authorisation would have to be submitted to the Competent Authority.

## 8. Public Participation Process ("PPP")

- 8.1. The BAR must be subjected to a PPP that complies with Chapter 6 of the EIA Regulations, 2014 (as amended) and must take into account any applicable Guidelines published in terms of Section 24J of the NEMA, this Department's Circular EADP/0026/2014 on the "One Environmental Management System" and the EIA Regulations, 2014 (as amended), as well as any other guidelines developed by this Department.
- 8.2. It is noted that the draft BAR has been made available to the relevant Organs of State and interested and affected parties ("I&APs") for a commenting period of 30 days and a copy of the draft BAR has been submitted to this Directorate for commenting in accordance with the requirements of Regulation 40(3) of the EIA Regulations, 2014 (as amended).
- 8.3. The Department herewith provides the following comments:
  - 8.3.1. Your attention is drawn to Circular 0027 of 2021 regarding the electronic administration of EIA applications. The Directorate: Development Management (Region 1 and 2) will continue with the electronic submission of correspondence and has for this reason established a dedicated e-mail address for the submission of all correspondence to the Directorates. For the Cape Town office, the e-mail address is [DEADPEIAAdmin@westerncape.gov.za](mailto:DEADPEIAAdmin@westerncape.gov.za).
  - 8.3.2. Please ensure that where electronic copies cannot be accessed by I&APs, alternative access to copies of the draft BAR are made available.

- 8.3.3. E-mail notification to I&APs is strongly supported. However, other means of notification for those I&APs will be required, where no e-mail addresses are available, or where the likelihood of success of this electronic correspondence is expected to be low.
  - 8.3.4. Where I&APs are unable to access electronic copies of the draft BAR, a hard copy of the report must be made available. Alternatively, the EAP will be required to engage with I&APs, with respect to alternative methods of accessing electronic copies of the draft BAR.
  - 8.4. It is imperative that State Departments and/or Organs of State be in possession of the Reports when the EAP issues them with the notice in terms of Section 24O of the NEMA. Please note that the EAP is responsible for such consultation. Therefore, it is requested that the EAP include proof of such notification to the relevant State Departments and/or Organs of State in terms of Section 24O(2) and (3) of the NEMA in the BAR, where appropriate.
  - 8.5. The following State Departments and/or Organs of State must be consulted during the EIA process as part of the PPP:
    - 8.5.1. CapeNature;
    - 8.5.2. Heritage Western Cape;
    - 8.5.3. Western Cape: Department of Agriculture,
    - 8.5.4. DEA&DP: Directorate: Waste Management;
    - 8.5.5. DEA&DP: Directorate: Pollution and Chemicals Management; and
    - 8.5.6. The relevant departments within the Saldanha Bay Municipality.
  - 8.6. A register of I&APs must be opened and maintained. The said register must be submitted to this Department. The EAP must record and respond to all comments received. The comments and responses must be captured in a 'Comments and Responses Report' and must include a description of the PPP followed. This report must be included in the public participation information attached to the final BAR to be submitted for a decision.
9. Environmental Management Programme ("EMPr")
- 9.1. In accordance with Section 24N of the NEMA and Regulation 19 of the EIA Regulations 2014 (as amended), this Department hereby requires the submission of an Environmental Management Programme ("EMPr"). The contents of such an EMPr must meet the requirements outlined in Section 24N (2) and (3) of the NEMA (as amended) and Appendix 4 of the EIA Regulations 2014 (as amended).
  - 9.2. The EMPr must address the potential environmental impacts of the proposed expansion throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing). The EMPr must be submitted together with the BAR. When compiling the EMPr, this Department's Guideline for Environmental Management Plans (June 2005), available on this Department's website: <http://www.westerncape.gov.za/eadp>, must be taken into account as well as Appendix 4 of the EIA Regulations, 2014 (as amended).

## 10. Alternatives

- 10.1. Be advised that in terms of the EIA Regulations, 2014 (as amended) and the NEMA the investigation of alternatives is mandatory. All alternatives identified must therefore be investigated to determine if they are feasible and reasonable. In this regard it must be noted that this Department may grant authorisation for an alternative as if it has been applied for or may grant authorisation in respect of all or part of the activity applied for as specified in Regulation 20 of the EIA Regulations, 2014 (as amended). Alternatives are not limited to activity alternatives, but include layout alternatives, design, activity, operational and technology alternatives.



- 10.2. You are hereby reminded that it is mandatory to investigate and assess the option of not proceeding with the proposed activity (i.e., the “no-go” option) in addition to other alternatives identified. Every EIA process must therefore identify and investigate alternatives, with feasible and reasonable alternatives to be comparatively assessed. If, however, after having identified and investigated alternatives, no feasible and reasonable alternatives were found, no comparative assessment of alternatives, beyond the comparative assessment of the preferred alternative and the option of not proceeding, is required during the assessment. What would, however, be required in this instance is proof that the investigation was undertaken and motivation indicating that no reasonable or feasible alternatives other than the preferred option and the ‘no-go’ option exist.

## 11. Exemptions

- 11.1. This Department notes that you do not intend to apply for exemption in terms of the National Exemption Regulations, 2014 from any of the requirements of the PPP, as stipulated in Regulation 41 of the EIA Regulations, 2014 (as amended) and that you do not intend to apply for exemption from any other provisions contained in the EIA Regulations, 2014 (as amended), the NEMA or any notice issued under the NEMA.
- 11.2. Please note that should you fail to meet a requirement of the EIA Regulations, 2014 (as amended) or the NEMA and if no exemption from that provision was applied for and granted, your EIA application may be refused by this Department.

## 12. Need and Desirability

In terms of the EIA Regulations, 2014 (as amended), when considering an application, this Department must take into account a number of specific considerations including, *inter alia*, the need for and desirability of any proposed development. As such, the need for and desirability of the proposed activity must be considered and reported on in the BAR. The BAR must reflect how the strategic context of the site in relation to the broader surrounding area, has been considered in addressing need and desirability.

## 13. NEMA Principles

In addition to the above, you must clearly show how the proposed development complies with the principles contained in Section 2 of the NEMA and must also show how the proposed development meets the requirements of sustainable development.

## 14. Social and Gender Considerations

You are reminded that the social context of the proposed development must always be considered. This includes the impact that the development proposal may have on the prevalence of HIV/AIDS, Sexually Transmitted Infections (“STI”) and Tuberculosis (“TB”), as well as equity and gender related concerns.

## 15. Climate Change

The BAR must report on the potential impacts on climate change. One of the objectives of the Western Cape Provincial Spatial Development Framework published by this Department is to minimise the consumption of scarce environmental resources such as water, fuel, building materials, mineral resources, electricity, and land. To this effect and as part of the efforts to reduce the effects of climate change, you must, as part of the EIA process, identify energy efficient technologies that could be implemented for the proposed development.

16. General

- 16.1. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.
- 16.2. It is prohibited in terms of Section 24F of the NEMA for a person to commence with a Listed Activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity. Non-compliance in terms of the prohibition must be referred to this Department's Directorate: Environmental Law Enforcement for possible prosecution. A person convicted of an offence in terms of the above is liable for a fine not exceeding R10 000 000 or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.
17. This Directorate reserves the right to revise or withdraw its comments and request further information based on any information received.

Your interest in the future of the environment is greatly appreciated.

Yours faithfully



Digitally signed by  
Tahir Dreyer  
Date: 20.06.05.15  
14:56:53 +0200

pp **MR. ZAAHIR TOEFY**  
**DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)**

Copied to:

1. Mr. Nicolaas Hanekom (Enviro-EAP (Pty) Ltd))
2. Ms. Nazeema Duarte (Matzikama Municipality)
3. Mr. Andre Oosthuizen (DEA & DP: DDF)

E-mail: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

E-mail: [nazeema.duarte@sbm.gov.za](mailto:nazeema.duarte@sbm.gov.za)

E-mail: [andre.oosthuizen@westerncape.gov.za](mailto:andre.oosthuizen@westerncape.gov.za)

