Western Cape Government

Department of Environmental Affairs and Development Planning

BASIC ASSESSMENT REPORT

THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.

APRIL 2024

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APRIL 2024

(For official use only)	
Pre-application Reference Number (if applicable):	
EIA Application Reference Number:	16/3/3/6/1/A2/18/3028/25
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

GENERAL PROJECT DESCRIPTION

(This must Include an overview of the project including the Farm name/Portion/Erf number)

THE PROPOSED DEVELOPMENT OF THE 15 ON HECTOR AFFORDABLE HOUSING DEVELOPMENT ON ERF 6482, LOTUS RIVER, CITY OF CAPE TOWN

DEA&DP NOI REFERENCE NUMBER: 16/3/3/6/7/1/A2/18/3101/25

HWC CASE NUMBER: HWC25021004SVB0210

Executive Summary

Introduction

The Western Cape Department of Infrastructure (DoI – 'the Applicant') intends to develop a ~5 ha housing development ('the project') on Erf 6482, Lotus River, Cape Town ('the site'). The project is intended to provide government subsidised housing to qualifying beneficiaries and forms part of the greater Retreat housing initiative.

Developments which trigger activities listed in terms of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, promulgated in terms of the National Environmental Management Act 107 of 1998 (NEMA) require an Environmental Authorisation (EA) prior to commencing with these activities. A Basic Assessment (BA) is required as part of this application for an EA, as the proposed development triggers activities listed in Listing Notice (LN) 1 of the NEMA EIA Regulations, 2014, as amended.

The Basic Assessment Report (BAR) for this project is subject to a 30-day pre-application public review period. All comments on this BAR will be considered and, where appropriate, changes will be incorporated into the (formal) BAR. Following this, a formal application for EA will be submitted to the Competent Authority (in this case DEA&DP), and the BAR will be subjected to a second public review period (post-application). Comments received during both Public Participation Processes (PPP) will be considered, and where appropriate, changes will be incorporated into the Final BAR for submission to DEA&DP for final decision-making.

Chand Consultants ('Chand') was appointed by the DoI as the independent Environmental Assessment Practitioner (EAP) to undertake the BA process for the project.

Project Description

The project, 15 on Hector Housing Development, will consist of affordable housing, including Breaking New Ground (BNG)[1] and (possibly) First Home Finance (FHF)[2] housing units[3]. Approximately 318 housing units are proposed, ~80% of which will be two-storey walk-up units, and ~20% of which will be single-storey units (designed to support diverse household structures, including those requiring improved accessibility). Each unit will be located on erven ranging from ~75 m² to ~95 m². Two-storey units will be ~45 m² and single-storey units will be ~40 m² in size.

In addition, the following infrastructure is proposed as part of the development:

- A network of internal roads, designed to municipal standards and incorporating:
  - Safe pedestrian movement.
  - Non-motorised transport (NMT) integration, and
  - Controlled vehicular access, with no direct access to Strandfontein Road.
- Public open space, ~10 075 m² in size, designed to support recreation, informal play, and social interaction.
- Community facilities, possibly for:
  - A ~498 m² flexible community facility/place of worship/Early Childhood Development (ECD) facilities or similar community-supportive uses, and
  - Land use rights for small-scale local services to meet daily needs.
- Stormwater infrastructure (detention ponds and swales);
- Soft landscaping (using indigenous plant species); and
- Service infrastructure.

The project will be developed in three phases:

- Phase 1: approximately 47% of residential units, community facilities, the pocket park, utility services (including water and electrical infrastructure), stormwater infrastructure and key internal and access routes;
- Phase 2: approximately 42% of residential units, one electrical substation and key internal and access roads; and
- Phase 3: approximately 11% of residential units and key internal and access roads.

Project Location

The site is bordered by Edward Avenue to the north, a public open space to the west and a road reserve to the south. Marius road borders the eastern boundary of the site and the M17 (Strandfontein Road) is located a further ~350 m to the east of the site, beyond which is the Philippi Horticultural Area.

Alternatives

No property or site alternatives have been considered for the project. However, with input from an Aquatic Biodiversity specialist, the site layout underwent various iterations to minimise impacts on wetlands which surround the site. In addition to the preferred layout, an alternative configuration was also considered ('Alternative 1'). Alternative 1 comprises 319 units, ~ 70% of which will be two-storey walk-up units, 26% of which will be single-storey units and 2% of which will be veteran units. Alternative 1 comprises slightly less two-storey and veteran units and more single-storey units than the preferred alternative. The additional units in Alternative 1 are located along the southern and western boundaries of the site. However, these have been relocated/removed in the preferred alternative to mitigate the risk of dumping in the open spaces around the wetlands surrounding the site, as recommended by the Aquatic Biodiversity specialist. The layout of internal roads has subsequently

[1] An affordable housing intervention recognised under South Africa Africa's BNG policy (Department of Human Settlements, 2004).
[2] A government housing support programme designed to help lower to middle income households buy/build their first homes.
[3] The type of affordable housing will be confirmed during the project implementation stage with guidance by market interest.

been reconfigured to accommodate a road as a more acceptable interface with the open space to the south and the west of the housing component of the development.

The No-Go Alternative implies the project does not go ahead, i.e., that no affordable housing will be developed on the site, and the current unlawful activities will continue, and/or other activities not requiring authorisation may be pursued. Current activities taking place at the site include occupancy of informal dwellings, structures and the school buildings and dumping of waste (general domestic waste, bricks and building materials and glass).

The No-Go Alternative is not preferred as the project will make a meaningful contribution to addressing the housing backlog in Cape Town, reduce the number of unlawful occupations and provide opportunities for homeownership to the surrounding community, improve infrastructure development in the area (through non-motorised transport routes, road upgrades etc.) alleviate dumping on Erf 6482, and make valuable socio-economic contributions to the area. Additionally, the project will improve the safety of the area as it will counteract the status quo of the surrounding area. The outcomes of the proposed development aligns with the City of Cape Town's (CoCT) strategic objectives.

Site locality

Legislation

Chand has determined that the project will trigger Activity 19 of LN 1 (*The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse*). The DoI is therefore required to apply for an EA from DEA&DP, informed by a BA process.

The project will also require a Water Use Authorisation (WUA) as it triggers water uses listed under Section 21 of the National Water Act 36 of 1998. An application for WUA will be applied for in concurrence with the 'formal' BA process.

Baseline Environment

Groundwater

The site is underlain by the Cape Flats Aquifer, which presents a high yielding potential and good water quality. Localised contamination of the aquifer is likely due to the highly permeable nature of the aquifer's geology and the shallow water table. Although the aquifer is considered to have a very high vulnerability to point source contamination, the project is assessed to have a low impact on groundwater if the mitigation measures specified by the groundwater specialist are adhered to. Depth to groundwater at the site is 4.91 meters below ground level (mbgl).

Surface Water

Extensive seasonal wetlands in good conditions are located just outside the southern boundary of the site. These wetlands are seasonally saturated to inundated depressions and support various threatened indigenous wetland plant and animal species. Patches of seasonally saturated wetlands are located just outside the western boundary of the site. The Big Lotus River[4] flows further west of these wetlands.

Large areas of seasonally inundated and saturated wetlands are present within the site (although much of the site has been infilled). Some of the seasonally inundated wetlands have been excavated, forming artificial depressions and presenting

[4] The Big Lotus River is concrete and canalised in these reaches, enabling the river to contain big floods (Liz Day Consulting, 2025).

poor water quality.

The project will be developed over all the wetlands at the site, but includes adequate provision of infrastructure to manage stormwater runoff. The layout will include a minimum 20 m setback buffer from the wetland outside of the southern boundary of the site, ensuring that no hard infrastructure will be located within 20 m of this wetland. Portions of the buffered area will be used for development of swales. Two swales and a detention pond will be constructed in the open area in the western portion of the site.

Seasonal wetlands south of the site (beyond the site boundaries)

Biodiversity

The site is located within the Table Mountain Strategic Water Source Area (SWSA)[5]. The Table Mountain SWSA is regarded as a very broad scale spatial data feature that is not deemed significant in this case given that the site is located in an urbanised area. Therefore, the SWSA has no influence on the project.

The site falls within a region which historically (but no longer) comprised critically endangered Cape Flats Sand Fynbos vegetation. The site is currently regarded as a transformed environment comprising almost exclusively of exotic species. No species of conservation concern are present at the site, as confirmed by a ground truthing exercise conducted by a terrestrial biodiversity specialist.

Eleven trees (including *Schinus terebinthifolius* Brazilian pepper trees, *Platunus x acerfolia* London plane trees, *Cypress* conifer tree and *Syzygium cordatum* water berry tree) were identified at the site, all of which are located around the old school buildings in the southeastern portion of the site.

No sensitive areas delineated in terms of the Western Cape Biodiversity Spatial Plan and the City of Cape Town Biodiversity Spatial Plan (e.g., Critical Biodiversity Areas, Ecological Support Areas or any other designated conservation areas) are located at the site.

Socio-economic

The site is located in Ward 66, Sub-council 18 within the suburb of Lotus River. On its own, Lotus River constitutes a sub-place[6]. Key socio-economic statistics are summarised below:

- Lotus River has a population of 38 143, making up 8 895 households with and average size of 4.29 people per household.
- The largest segment of the population is coloured (~93%).
- There are marginally more females (51.8% of the population) than males (48.2% of the population) living in Lotus River.
- Almost half of the population (49%) is made up of 25 to 64 year olds.
- Most of the working age population[7] is employed (~80%), and the overall unemployment rate is 19.53%, and the labour absorption rate[8] is 49.92%.
- Approximately 40% of households have a monthly income of R 3 200 or less.
- Approximately 20% of households have a monthly income ranging from R 3 201 to R 6 400, and ~18% of households have an income ranging from R 6 401 to R 12 800. Approximately 8.5% of households have no income.
- Almost all (~96%) of households reside in formal dwellings.

[5] SWSAs refer to the 10% of South Africa's land area that provides a disproportionate 50% of the country's water runoff (Lötter, 2021).
[6] A smaller geographic area that forms part of a larger region (i.e., Lotus River is a sub-place of the bigger allotment of Grassy Park).
[7] According to Statistics South Africa, the working age population ranges from 15 to 64 years old.
[8] Proportion of the working age population that is employed.

- Most households (~40%) reside in rented dwellings. Only 30% of households reside in dwellings that they own and is fully paid off. Approximately 25% of households reside in dwellings that they own but have not yet paid off.
- Almost all (~99%) of households have access to piped water.
- Approximately 97% of households have access to a flush toilet connected to the public sewer system and more than 99% of households have their refuse removed at least once per week.
- Almost all (99%) of households use electricity for lighting in their dwelling.
- Approximately 90% of households use electricity for cooking (9.1% use gas). Approximately 74% of households use electricity for heating (~22% do not use energy for heating).

Summary of Impacts

This BA process identified and assessed all significant impacts associated with the proposed development/project. Three specialist studies were undertaken, namely, a groundwater impact assessment, an aquatic biodiversity impact assessment (including wetland delineation and water sampling tests) and terrestrial biodiversity compliance statement.

Groundwater

The following impacts on groundwater were identified:

- The available area for groundwater recharge will be reduced. The significance of this impact is rated as ***Medium (negative)*** and is reduced to ***Low (negative)*** after mitigation;
- Groundwater may be contaminated by construction activities. The significance of this impact is rated as ***Medium (negative)*** and is reduced to ***Low (negative)*** after mitigation; and
- Groundwater resources may be contaminated by contaminated stormwater infiltration and/or sewage leaks. The significance of this impact is rated as ***Medium (negative)*** and is reduced to ***Low (negative)*** after mitigation.

Aquatic Biodiversity

The following impacts on aquatic biodiversity were identified:

- Definite loss of the wetlands on the site. The significance of this impact is rated as ***Medium-High (negative)*** and no mitigation is possible if the project is approved;
- Wetlands surrounding the site may be degraded due to construction activity. The significance of this impact is rated as ***High (negative)*** and is reduced to ***Low (negative)*** after mitigation;
- Wetlands surrounding the site will be susceptible to the dumping of solid waste by backyard settlements for whom service delivery has not been planned for. The significance of this impact is rated as ***Medium-High (negative)*** and is reduced to ***Low (negative)*** after mitigation; and
- The Big Lotus River will be susceptible to the dumping of solid waste by potential backyard settlements for whom service delivery has not been planned for. The significance of this impact is rated as ***Medium-High (negative)*** and is reduced to ***Low (negative)*** after mitigation.

Terrestrial Biodiversity

As no species of conservation concern (SCC) or remnants of indigenous vegetation (Cape Flats Sand Fynbos) were identified at the site, the site is verified to have a *Low* terrestrial biodiversity sensitivity. Furthermore, the current state of the site is considered to be highly transformed. Therefore, the project will not have an impact on terrestrial biodiversity.

Public Participation

A formal public participation process (PPP) will be undertaken once a formal application in support of EA is submitted to DEA&DP. Nevertheless, a first phase of PPP ('pre-application PPP') is currently being undertaken. The pre-application PPP meets the requirements of PPP specified in the EIA Regulations, 2014, as amended. PPP activities undertaken as part of the pre-application PPP include:

- Advertising the project in the *People's Post* newspaper;
- Erecting A2-sized site notification posters at conspicuous locations around the site boundary;
- Releasing the Draft BAR (this report) for comment from 11 November 2025 to 11 December 2025 (30 days);
- Making hard copies of the Draft BAR (this report) available for public review at:
  - Sub-council 18 office (Corner of Buck Road and 6th Avenue, Lotus River, 7941); and
  - Chand Consultants' offices in Plumstead, Cape Town;
- Providing written notification to potential interested and affected parties (IAP) (via email and post [to potential IAPs who do not have email addresses]) about the availability of the Draft BAR (this report) for public comment; and
- Dropping letters at adjacent properties and properties within a two-block radius (where contact information is not available).

The formal PPP (i.e., PPP to be conducted after formal submission of the application form) will follow the same PPP process as indicated above. However, as the project will require a Water Use Licence (WUL), the formal PPP will include a 60-day (rather than a 30-day) comment period to make provision for the PPP requirements specified in GN R267 of 2017, as amended (*Water Use Licence Application and Appeals Regulations*). All documentation related to the formal PPP (e.g., newspaper adverts, letters etc) will include the details of both the EA application and WUL application.

Conclusion

This Draft BAR identified and assessed the potential impacts associated with the project. The project will result in unavoidable adverse impacts, specifically on wetlands within the site boundary. Wetlands surrounding the site will also be adversely impacted, although these impacts are of limited intensity assuming that the recommended mitigation measures are implemented.

The project will make a meaningful contribution to addressing the current backlog in the provision of housing in Cape Town, specifically for beneficiaries of the greater Retreat initiative.

Assuming that the Applicant is committed to the implementation of the recommended mitigation measures, Chand believes that this Draft BAR demonstrates that the adverse impacts can be reduced to acceptable levels.

The study did not reveal any fatal flaws and all specialist recommendations are incorporated into the design and the Environmental Management Programme.

Way Forward

This Draft BAR is not final and can be amended based on comments received from stakeholders. Issues identified during the pre-application PPP will assist in focussing the 'formal' BA process. IAPs are encouraged to comment on this BAR and/or submit their details to be registered on the project database. IAPs must provide written comments and/or request to register on the project database with their name and contact details to the Chand contact person below by **4 December 2025**.

Chand contact:

Murad Esau
Email: **info@chand.co.za**
Tel: **021 762 3050**
Postal address: **Block A, Plum Park, 4 St. Clair Road, Plumstead, 7800**

An electronic copy of the BAR is available for public review on:

- Chand's website: www.chand.co.za – click on 'The Know How' and then 'Projects Under Review 2024'; and
- The Western Cape Department of Infrastructure's website: https://www.westerncape.gov.za/infrastructure/15-hector-erf6482-lotus-river

A hard copy of the BAR is available at:

- Sub-council 18 office (Corner of Buck Road and 6th Avenue, Lotus River, 7941); and
- Chand Consultants' offices in Plumstead, Cape Town.

IAPs can register on the project database by contacting the Chand contact person listed above. IAPs must provide their name, surname, contact details and preferred method of communication (e.g., email) when requesting to be registered.

Only registered IAPs will be notified of opportunities to provide comments.

IMPORTANT INFORMATION TO BE READ PRIOR TO COMPLETING THIS BASIC ASSESSMENT REPORT

1. **The purpose** of this template is to provide a format for the Basic Assessment report as set out in Appendix 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in order to ultimately obtain Environmental Authorisation.

2. The Environmental Impact Assessment ("EIA") Regulations is defined in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") hereinafter referred to as the "NEMA EIA Regulations".

3. *Submission of documentation, reports and other correspondence:*

   The Department has adopted a digital format for corresponding with proponents/applicants or the general public. If there is a conflict between this approach and any provision in the legislation, then the provisions in the legislation prevail. If there is any uncertainty about the requirements or arrangements, the relevant Competent Authority must be consulted.

   The Directorate: Development Management has created generic e-mail addresses for the respective Regions, to centralise their administration. Please make use of the relevant general administration e-mail address below when submitting documents:

   DEADPEIAAdmin@westerncape.gov.za
   Directorate: Development Management (Region 1):
   City of Cape Town; West Coast District Municipal area;
   Cape Winelands District Municipal area and Overberg District Municipal area.

   DEADPEIAAdmin.George@westerncape.gov.za
   Directorate: Development Management (Region 3):
   Garden Route District Municipal area and Central Karoo District Municipal area

   General queries must be submitted via the general administration e-mail for EIA related queries. Where a case-officer of DEA&DP has been assigned, correspondence may be directed to such official and copied to the relevant general administration e-mail for record purposes.

   All correspondence, comments, requests and decisions in terms of applications, will be issued to either the applicant/requester in a digital format via email, with digital signatures, and copied to the Environmental Assessment Practitioner ("EAP") (where applicable).

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4. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.

5. All applicable sections of this BAR must be completed.

6. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.

7. This BAR is current as of **April 2024**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at http://www.westerncape.gov.za to check for the latest version of this BAR.

8. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an environmental authorisation in terms of the NEMA EIA Regulations

when the Western Cape Government Department of Environmental Affairs and Development Planning ("DEA&DP") is the Competent Authority.

9. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.

10. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.

11. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.

12. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"), the "One Environmental System" is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department's Circular EADP 0028/2014: One Environmental Management System.

13. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA") is triggered, a copy of Heritage Western Cape's final comment must be attached to the BAR.

14. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link https://screening.environment.gov.za/screeningtool to generate the Screening Tool Report. The screening tool report must be attached to this BAR.

15. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA"), the submission of the Report must also be made as follows, for-
    Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

    Atmospheric Emissions Licence Applications, this report must also be (i.e., another hard copy and electronic copy) submitted for the attention of the Licensing Authority or this Department's Air Quality Management Directorate (Tel: 021 483 2888 and Fax: 021 483 4368) at the same postal address as the Cape Town Office.

DEPARTMENTAL DETAILS	
CAPE TOWN OFFICE: **DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1)** (City of Cape Town, West Coast District, Cape Winelands District & Overberg District)	**GEORGE REGIONAL OFFICE:** **DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 3)** (Central Karoo District & Garden Route District)
The completed Form must be sent via electronic mail to: DEADPEIAAdmin@westerncape.gov.za Queries should be directed to the Directorate: Development Management (Region 1) at: E-mail: DEADPEIAAdmin@westerncape.gov.za Tel: (021) 483-5829 Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1) Private Bag X 9086 Cape Town, 8000	The completed Form must be sent via electronic mail to: DEADPEIAAdmin.George@westerncape.gov.za Queries should be directed to the Directorate: Development Management (Region 3) at: E-mail: DEADPEIAAdmin.George@westerncape.gov.za Tel: (044) 814-2006 Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	
Site Plan:	Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following: • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. • The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. • The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development **must** be clearly indicated on the site plan. • Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. • Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): o Watercourses / Rivers / Wetlands o Flood lines (*i.e.*, 1:100 year, 1:50 year and 1:10 year where applicable);

	○ Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): ○ Ridges; ○ Cultural and historical features/landscapes; ○ Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as **Appendix C**. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as **Appendix D**.
Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as **Appendix A3**.

ACRONYMS

BA:	Basic Assessment
BAR:	Basic Assessment Report
BNG:	Breaking New Ground
CBA:	Critical Biodiversity Areas
CBD:	Central Business District
CoCT:	City of Cape Town
CO1:	Community 1: Local
CR:	Critically Endangered
DAFF:	Department of Forestry and Fisheries
DEA&DP:	Western Cape Department of Environmental Affairs and Development Planning
DEA:	Department of Environmental Affairs
DFFE:	Department of Forestry, Fisheries and the Environment
DHS:	Department of Human Settlement
DoA:	Department of Agriculture
DoH:	Department of Health
DWS:	Department of Water and Sanitation
EA:	Environmental Authorisation
EAP:	Environmental Assessment Practitioner
ECD:	Early Childhood Development
ECO:	Environmental Control Officer
EIA:	Environmental Impact Assessment
EMF:	Environmental Management Framework

EMPr:	Environmental Management Programme
EN:	Endangered
EX:	Extinct
ESA:	Ecological Support Area
FHF:	First Home Finance
GIS:	Geographic Information System
HWC:	Heritage Western Cape
IEM:	Integrated Environmental Management
IUDF:	Integrated Urban Development Framework
IAP:	Interests of all Interested and Affected Party
ICMA:	Integrated Coastal Management Act 24 of 2008
IDP:	Integrated Development Plan
LC:	Least Concern
MEC:	Member of Executive Council
MSDF:	Municipal Spatial Development Framework
NBA:	National Biodiversity Assessment
NEM:AQA:	National Environmental Management: Air Quality Act, 39 OF 2004
NEM:WA:	National Environmental Management Waste Act 59 of 2008
NEMA:	National Environmental Management Act
NEMBA:	National Environmental Management Biodiversity Act 10 of 2004
NEMPAA:	National Environmental Management: Protected Areas Act 57 of 2003
NFEPA:	National Freshwater Ecosystem Protection Assessment
NHRA:	National Heritage Resources Act 25 OF 1999
NHRA:	National Heritage Resources Act 25 OF 1999
NID:	Notification of Intent to Develop
NWM5:	National Wetland Map 5
NOI:	Notice of Intent
NSBA:	National Spatial Biodiversity Assessment
NT:	Near Threatened
NWA:	National Water Act 36 of 1998
PPP:	Public Participation Process
PSDF:	Provincial Spatial Development Framework
RDP:	Reconstruction and Development Programme
ROD:	Record of Decision
SANBI:	South African National Biodiversity Institute
SCC:	Species of Conservation Concern
SDF:	Spatial Development Framework
SSVR:	Site Sensitivity Verification Report
TOR:	Terms of Reference
VOC:	Volatile Organic Compound
VU:	Vulnerable
WCBSP:	Western Cape Biodiversity Spatial Plan
WCIF:	Western Cape Infrastructure Framework 2050
WCIS:	Western Cape Infrastructure Strategy 2050
WCIIP:	Western Cape Infrastructure Implementation Plan 2050
WCG:	Western Cape Government

LIST OF FIGURES

LIST OF TABLES

ATTACHMENTS

Note: The Appendices must be attached to the BAR as per the list below. Please use a ✓ **(**tick) or a **x** (cross) to indicate whether the Appendix is attached to the BAR.

The following checklist of attachments must be completed.

APPENDIX			**✓ (Tick) or x (cross)**
Appendix A:	**Maps**		
	Appendix A1:	**Locality Map**	✓
	Appendix A2:	**Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning**	X
	Appendix A3:	**Map with the GPS co-ordinates for linear activities**	X
Appendix B:	**Appendix B1:**	**Site development plan(s)**	✓
	Appendix B2	**A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;**	✓
Appendix C:	**Photographs**		✓
Appendix D:	**Biodiversity overlay map**		✓
Appendix E:	**Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.** **Please note that comments from the relevant competent authorities will be provided in the Final BAR Report.**		
	Appendix E1:	**Final comment/ROD from HWC**	✓
	Appendix E2:	**Copy of comment from Cape Nature**	X
	Appendix E3:	**Final Comment from the DWS**	X
	Appendix E4:	**Comment from the DEA: Oceans and Coast**	X
	Appendix E5:	**Comment from the DAFF**	X
	Appendix E6:	**Comment from WCG: Transport and Public Works**	X
	Appendix E7:	**Comment from WCG: DoA**	X
	Appendix E8:	**Comment from WCG: DHS**	X
	Appendix E9:	**Comment from WCG: DoH**	X

APPENDIX			✓ (Tick) or x (cross)
	Appendix E10:	**Comment from DEA&DP: Pollution Management**	X
	Appendix E11:	**Comment from DEA&DP: Waste Management**	X
	Appendix E12:	**Comment from DEA&DP: Biodiversity**	X
	Appendix E13:	**Comment from DEA&DP: Air Quality**	X
	Appendix E14:	**Comment from DEA&DP: Coastal Management**	X
	Appendix E15:	**Comment from the local authority**	X
	Appendix E16:	**Confirmation of all services (water, electricity, sewage, solid waste management)**	✓
	Appendix E17:	**Comment from the District Municipality**	X
	Appendix E18:	**Copy of an exemption notice**	X
	Appendix E19	**Pre-approval for the reclamation of land**	X
	Appendix E20:	**Proof of agreement/TOR of the specialist studies conducted.**	X
	Appendix E21:	**Proof of land use rights**	✓
	Appendix E22:	**Proof of public participation agreement for linear activities**	X
Appendix F:	**Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.** **Please note that public participation information will be provided in the Final BAR Report. A register of *potential* IAPs has been appended.**		✓
Appendix G:	**Specialist Report(s)**		✓
Appendix H:	**EMPr**		✓
Appendix I:	**Screening tool report**		✓
Appendix J:	**The impact and risk assessment for each alternative**		X[9]

[9] Included in Section H of this BAR.

APPENDIX		✓ (Tick) or x (cross)
Appendix K:	**Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline**	X[10]
Appendix L:	**Power of Attorney for Planning Partners**	✓
Appendix M:	**Assessment Criteria and Methodology**	✓
Appendix N:	**Tree Survey**	✓
Appendix O:	**Landscape Master Plan**	✓
Appendix P:	**Stormwater Management Plan**	✓

[10] Included in Section E of this BAR.

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE: REGION 1		~~GEORGE OFFICE: BEGION 3~~
	(City of Cape Town, West Coast District)	~~(Cape Winelands District & Overberg District)~~	~~(Central Karoo District & Garden Route District)~~

Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	Western Cape Government: Department of Infrastructure.	
Name of contact person for Applicant/Proponent (if other):	Ms. Lisa Van Aarde (authorised representative as per Power of Attorney (see Appendix N).	
Company/ Trading name/State Department/Organ of State:	Western Cape Government: Department of Infrastructure.	
Company Registration Number:	Not applicable as the Applicant is an organ of state.	
Postal address:	4th Floor, 9 Dorp Street, Cape Town City Centre.	
		Postal code: 8000
Telephone:	+27(0) 21 483 5668 +27(0) 21 418 0510	Cell: +27(0) 72 844 9684 +27(0) 83 771 2493
E-mail:	lisa@planpart.co.za	Fax: ( )
Company of EAP:	Chand Consultants	
EAP name:	Mr. Ludwig Van Der Merwe (Terramanzi Group Pty Ltd) (Registered EAP) *Independent Reviewer and Sign Off	
Postal address:	Block A, Plum Park, 4 St. Clair Road, Plumstead, Cape Town	
		Postal code: 7801
Telephone:	+27(021) 762 3050	Cell: +27(072) 569 1047
E-mail:	info@chand.co.za	Fax: ( )
Qualifications:	Master of Environmental Management and Development (The Australian National University); BSc Conservation Ecology, Environmental Science (Stellenbosch University).	
EAP registration no:	Mr. Ludwig Van Der Merwe – 2020/2817	
Duplicate this section where there is more than one landowner Name of landowner:	Western Cape Government: Department of Infrastructure	
Name of contact person for landowner (if other):	Ms. Amozelle Lambrechts	
Postal address:	4th Floor, 9 Dorp Street, Cape Town City Centre	
		Postal code: 8000
Telephone:	+27(0) 21 483 5668	Cell: +27(0) 83 771 2493
E-mail:	Amozelle.lambrechts@westerncape.gov.za	Fax: ( )
Name of Person in control of the land:	Western Cape Government: Department of Infrastructure	
Name of contact person for person in control of the land:	Ms. Amozelle Lambrechts	
Postal address:	4th Floor, 9 Dorp Street, Cape Town City Centre	
		Postal code: 8000
Telephone:	+27(0) 21 483 5668	Cell: +27(0) 83 771 2493
E-mail:	Amozelle.lambrechts@westerncape.gov.za	Fax: ( )

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	City of Cape Town Municipality	
Contact person:	Mr. Andy Greenwood	
Postal address:	Plessey Building, c/o Main and Victoria Roads, Plumstead	
		Postal code: 7801
Telephone	+27(021) 444 2604	Cell: N/A
E-mail:	Andrew.greenwood@capetown.gov.za	Fax:

SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS AS INLCUDED IN THE APPLICATION FORM

1.	Is the proposed development (please tick):	New	✓	~~Expansion~~	
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				

Brownfield site - the site is currently zoned as **Community 1** and was previously used for the operation of a school on the property (the Western Cape Department of Education confirmed that the buildings are no longer in use, and the site is no longer required for their purposes). Some of the school buildings remain present in the southeastern portion of the site. A demolition order is in place and the buildings have been partially demolished. No formal activities are currently taking place on the site. However, the following unlawful activities and structures are taking place/located at the site:

- Informal dwellings and structures;
- Occupancy of the remaining undemolished school buildings[11];
- Dumping of various forms of waste including:
  - General domestic waste;
  - Bricks and building materials; and
  - Glass.

Large portions of the site have been subject to infilling in the past, with an infill platform clearly visible along the southern boundary.

3.	**For Linear activities or developments**																							
~~3.1.~~	~~Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:~~																							
~~3.2.~~	~~Development footprint of the proposed development for all alternatives.~~																						~~m²~~	
~~3.3.~~	~~Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.~~																							
~~3.4.~~	~~Indicate how access to the proposed routes will be obtained for all alternatives.~~																							
~~3.5.~~	~~SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives~~																							
3.6.	~~Starting point co-ordinates for all alternatives~~																							
	~~Latitude (S)~~			°			‘			“														
	~~Longitude (E)~~			°			‘			“														
	~~Middle point co-ordinates for all alternatives~~																							
	~~Latitude (S)~~			°			‘			“														
	~~Longitude (E)~~			°			‘			“														
	~~End point co-ordinates for all alternatives~~																							
	~~Latitude (S)~~			°			‘			“														

[11] A process of eviction and relocation has been reactivated outside of this Basic Assessment process.

	~~Longitude (E)~~	°	‘	“

~~Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.~~

4.	**Other developments**	
4.1.	Property size(s) of all proposed site(s):	51 153 m²
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):	0 m²
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:	51 153 m²
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).	

The Western Cape Department of Infrastructure (DoI) intends to develop a ~5 ha housing development (‘the project’) is proposed on Erf 6482, Lotus River, Cape Town (‘the site’ – see Appendix A1). The site is bordered by Edward Avenue to the north, a public open space to the west and a road reserve to the south. Marius road borders the eastern boundary of the site and the M17 (Strandfontein Road) is located a further ~350 m to the east of the site, beyond which is the Philippi Horticultural Area.

The project is intended to provide government subsidised housing to qualifying beneficiaries and forms part of the greater Retreat housing initiative[12].

The project will consist of affordable housing, including Breaking New Ground (BNG)[13] and (possibly) First Home Finance (FHF)[14] housing units[15]. Approximately 318 housing units are proposed, ~80% of which will be two-storey walk-up units (to accommodate affordable rental and ownership opportunities), and ~20% of which will be single-storey units designed to support diverse household structures, including those requiring improved accessibility). Each unit will be located on erven ranging from ~72 m² to ~96 m². Two-storey units will be ~45 m² and single-storey units will be ~40 m² in size.

In addition, the following infrastructure is proposed as part of the development:

- A network of internal roads;
- Community facilities;
- Stormwater infrastructure;
- Public open space and landscaping (using indigenous plant species); and
- Service infrastructure.

Internal Roads

The internal road network will provide access to all housing units via two primary access points: one on the northern boundary (Edward Avenue) and one on the eastern boundary (Hector Avenue). While both access points will accommodate two-way movement, the northern entrance will primarily serve the double-storey walk-up units, and the eastern entrance will primarily serve the single-storey units.

Road widths will range between 8 m and 10 m, in line with municipal standards, ensuring accessibility for service and emergency vehicles, including refuse collection. Adequate space will be ensured for refuse collection vehicles to perform turning shunts, if required.

The design incorporates sidewalks and verges to facilitate safe pedestrian circulation and on-street parking, with unit placement on erven configured to allow on-site parking where appropriate. The layout further supports non-motorised transport (NMT) integration, reinforcing the development's walkable neighbourhood character (see Figure 1).

Community Facilities

The project will deliver community-serving facilities to support social well-being, including:

- A ~498 m² flexible community facility/place of worship/Early Childhood Development (ECD) centre etc., located near the northern boundary to ensure visibility and accessibility;
- Land use rights to make provision for small-scale local services to meet daily neighbourhood needs.

Stormwater infrastructure

Four retention ponds and bio-retention swales are proposed to manage stormwater runoff. They are proposed to be constructed around the residential units within the site – three on the eastern side and one on the southern side.

Public Open Space and Landscaping

Approximately ~10 075 m² of public open space will be provided, locate near the northern boundary (opposite community facility/place of worship) to serve as a pocket park and, along the southern and western edges of the site to function both as recreational amenity and ecological buffer. The space will be landscaped with indigenous plant species to promote biodiversity, provide informal play opportunities, and strengthen the environmental character of the development.

[12] A housing development project in Cape Town aimed at delivering ~5 000 housing opportunities across several southern suburbs (Western Cape Government, 2019).
[13] An affordable housing intervention recognised under South Africa's BNG policy (Department of Human Settlements, 2004).
[14] A government housing support programme designed to help lower to middle income households buy/build their first homes.
[15] The type of affordable housing will be confirmed during the project implementation stage with guidance by market interest.

Service Infrastructure

Service infrastructure including a range of overhead and underground services (electrical, water, sewage, stormwater, telecommunication etc) will be installed or connected within the site boundary and will connect to the local municipal service infrastructure. Four distribution substations will be constructed, one:

- Along the northern boundary of the access road off Hector Avenue;
- On the southern boundary of the southernmost road abutting the retention pond/swale south of the housing units);
- In the western portion of the site, extending into the public open space; and
- South of the public open space opposite the community facility/place of worship, adjacent to a two-storey housing unit.

A water pressure booster tank (10 m x 10 m) will be constructed south of the public open space opposite the community facility/place of worship.

Development Phasing

The project will be developed in three phases:

- Phase 1 which will include construction of:
  - Approximately 136 two-storey units and ~15 single-storey units (~151 housing units in total) in the western portion of the site;
  - Community facilities;
  - The pocket park;
  - Utility services;
  - The stormwater infrastructure; and
  - Key internal and access roads.
- Phase 2 which will includes construction of:
  - Approximately 111 two-storey units and ~20 single-storey units (~131 housing units in total);
  - Utility services; and
  - Key internal and access roads.
- Phase 3 which will include construction of:
  - Approximately eight two-storey units and ~28 single-storey units (36 housing units in total);
  - Utility services; and
  - Key internal and access roads.

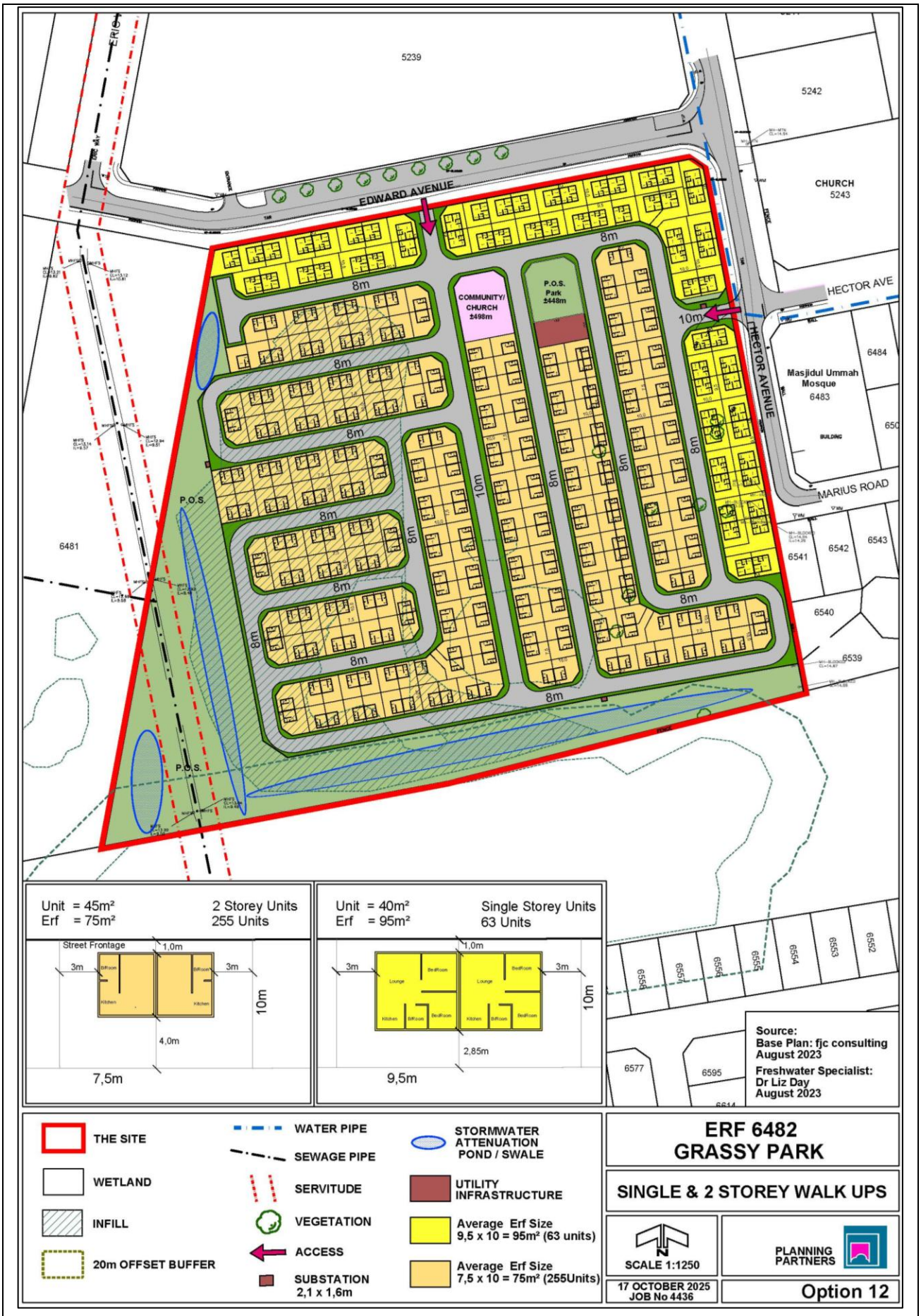

Figure 1: Concept Development Plan (source: Planning Partners, October 2025)

4.5.	Indicate how access to the proposed site(s) will be obtained for all alternatives.

The site is currently accessible via an informal access road from Marius Road, on the eastern side of the site.

Formal access to the site will be implemented via two separate access points:

- One along the northern boundary (via Edward Avenue); and
- One along the eastern boundary (via Hector Avenue).

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	1	6	0	0	2	0	0	0	0	0	6	4	8	2	0	0	0	0	0

4.7.	Coordinates of the proposed site(s) for all alternatives: **Approximate Centre of the site**			
	Latitude (S)	34°	1′	47.1″
	Longitude (E)	18°	31′	08.8″

SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS

1. Exemption applied for in terms of the NEMA and the NEMA EIA Regulations

Has exemption been applied for in terms of the NEMA and the NEMA EIA Regulations. If yes, include a copy of the exemption notice in Appendix E18.	~~YES~~	NO

2. Is the following legislation applicable to the proposed activity or development.

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.	~~YES~~	NO
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.	YES	~~NO~~
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3.	YES	~~NO~~
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	~~YES~~	NO
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")	~~YES~~	NO
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	~~YES~~	NO
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	~~YES~~	NO
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.	~~YES~~	NO

3. Other legislation

List any other legislation that is applicable to the proposed activity or development.
Not applicable.

4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.
The project complies with and responds to several national and local policies associated with the provision of housing to low-income households and urban development in Cape Town and the broader South Africa. The policies that were considered are briefly summarised below. **Western Cape Infrastructure Framework, Western Cape Infrastructure Strategy and Western Cape Infrastructure Implementation Plan 2050** The Western Cape Infrastructure Framework 2050 (WCIF) sets the scene for driving all infrastructure development towards 2050. It is designed to reshape the Western Cape's infrastructure landscape by addressing current challenges and anticipating future needs. The WCIF will give effect to the Western Cape Infrastructure Strategy 2050 (WCIS) and the Western Cape Infrastructure Implementation Plan 2050 (WCIIP) once adopted[16] (South African Government, 2025). The WCIS focuses on growth, social equity, sustainability and resilience, integrating high-level goals with actionable plans, emphasising impactful projects, municipal capacity, private sector partnerships, innovation, climate change and novel means of financing. It aims to address historical inequalities and create a vibrant, prosperous Western Cape (South African Government, 2025). The WCIIP 2050 operationalises the WCIF and WCIS, addressing socio-economic challenges through sustainable infrastructure development. It prioritises five key sectors including social, energy, water, economic, technology and ecological infrastructure. Spatial transformation, resilience and multi-sectoral collaboration supported by stakeholder engagement, innovative financing and robust monitoring are also emphasised by the WCIIP. The outcome of the WCIIP is an infrastructure project pipeline and portfolio of bankable infrastructure projects to enable future public and private investments in the province, inclusive of crucial municipal, provincial and private sector capital projects, providing a clear view of opportunities for collaboration – an imperative aspect in providing accelerated delivery for the Western Cape. The project proactively aligns with the WCIF, WCIS and WCIIP as it supports the objectives of these policies such as spatial transformation, job creation and maximising infrastructure benefits. **Breaking New Ground** Adopted in 2004, the BNG policy is a framework for the development of human settlements in South Africa. It presents itself as an alternative to the Reconstruction and Development Programme (RDP) housing development policy. Rather than only delivering subsidised housing solutions, the BNG policy aims to create integrated, sustainable and inclusive

[16] At the time of writing this report, no evidence suggests that the WCIF has been finalised. Nonetheless, the WCIF was endorsed by the Western Cape provincial Cabinet on 16 October 2025 (Western Cape Department of Infrastructure, 2024).

communities, addressing apartheid spatial legacies by integrating social, economic and environmental considerations into housing developments (Department of Human Settlements, 2004).

First Home Finance

The FHF policy was introduced in 2023 by the Department of Human Settlements (DHS) to enable sustainable and affordable first-time home ownerships for South Africans who fall within the 'gap' market[17]. Due to their income being regarded as too low for mortgage finance, it is difficult for households in the gap market to qualify for traditional forms of housing finance. In addition, their income is considered too high to qualify for government 'free basic housing', RDP or BNG housing (First Home Finance, 2023).

Department of Human Settlements Strategic Plan 2025/2030

The DHS Strategic Plan (2025) is a framework for planning, implementation and monitoring South Africa's housing and human settlement programmes. The policy aims to improve the provision of integrated, comprehensive and sustainable human settlement development services with a long-term goal of improving the quality of life of poor and vulnerable South Africans.

Integrated Urban Development Framework

The South African Integrated Urban Development Framework (IUDF) (2016) guides the growth and management of South Africa's urban areas. The overall goal of the IUDF is to steer urban growth "*towards a sustainable growth model of compact, connected and coordinated cities and towns*". To achieve this, the IUDP sets out four strategic goals – spatial integration, inclusion and access, growth and governance – which inform the objectives of the nine policy levers which includes (but is not limited to) integrated and sustainable human settlements (policy lever 4) and inclusive economic development (policy lever 6).

City of Cape Town Integrated Human Settlements Five-Year Sector Plan 2022/23 – 2023/27

The CoCT Integrated Human Settlements Five-Year Sector Plan 2022/23 – 2023/27 (IHSSP) was compiled in terms of the Housing Act 107 of 1997 and outlines the CoCT's plan to fulfil the housing needs of the growing and increasingly urbanised population of Cape Town.

5. Guidelines

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal.

The following guidelines have been considered relevant to the project:

- Guidelines on Environmental Impact Assessment (EIA) Regulations (2012) – these guidelines guided the Basic Assessment (BA) process. Where relevant, allowance has been made to align with the EIA regulations, 2014, as amended;
- Guidelines on Public Participation (2017) – these guidelines guided the BA process. Where relevant, allowance has been made to align with the necessary State of Disaster procedural requirements;
- Guideline for the Review of Specialist Input into the EIA process (2005) – this guideline has been considered for the compilation of this report and review and assimilation of specialist findings in that regard;
- Guideline for Environmental Management Plans (2005)- this guideline was considered when compiling the Environmental Management Programme (EMPr) included in Appendix H;
- Guidelines on Alternatives (2013)- These guideline guided the BA process. Where relevant, allowance has been made to align with the EIA Regulations, 2014, as amended;
- Guideline on Need and Desirability (2013). These guideline documents guided the Basic Assessment process, specifically in the information provided in this report pertaining to need and desirability, noting that where relevant, allowance was made to align with the 2014 EIA regulations;
- Department of Environmental Affairs (DEA) (now Department of Forestry, Fisheries and the Environment [DFFE] Integrated Environmental Management Guideline on Need and Desirability (2017) – this guideline informed the need and desirability discussion included in this report;
- CoCT Standard and Guidelines for Roads & Stormwater (2022) – used to inform the geotechnical investigations conducted of the site;
- CoCT Standard Specifications for Steel Pipes (1993);
- Minimum Standards for Civil Engineering Services in Townships;
- Western Cape Government Access Management Guidelines (2020);
- Guidelines for the implementation of the terrestrial fauna and flora species protocols for EIAs in South Africa (2020); and
- Ecosystem Guidelines for Environmental Assessment in the Western Cape (2019).

[17] South African citizens who earn between R 3 501 and R 22 000 per month.

6. Protocols

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form
A report generated by the *National Web-Based Environmental Screening Tool* (the 'Screening Tool') has been produced for the project in terms of GN 320 of 2020 (*Protocols for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes*). A Site Sensitivity Verification Report (SSVR) was subsequently produced by the Environmental Assessment Practitioner (EAP), verifying the sensitivities specified in the Screening Tool Report (see Appendix I). The following protocols are applicable to the project: • GN 320 of 2020 (*Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity*); • GN 320 of 2020 (*Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Biodiversity*); and • GN 1150 of 2020 (*Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Plant Species*). The following specialist studies were undertaken as part of the BA process: • Terrestrial Biodiversity Compliance Statement; • Groundwater Impact Assessment; and • Aquatic Biodiversity Impact Assessment.

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 1**	Describe the portion of the proposed development to which the applicable listed activity relates.
19	The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse; but excluding where such infilling, depositing, dredging, excavation, removal or moving — (i) will occur behind a development setback; (ii) is for maintenance purposes undertaken in accordance with a maintenance management plan; (iii) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (iv) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or (v) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.	Four wetlands are located within the boundaries of the site[18]. The wetlands are located in the southern and western portions of the site (see Figure 4) (Liz Day Consulting, 2025). More than 10 m^3 of material will be moved from and into the wetlands.
Note: • The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted. • Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.		

List the applicable waste management listed activities in terms of the NEM:WA

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Category A**	Describe the portion of the proposed development to which the applicable listed activity relates.
Not Applicable.		

List the applicable listed activities in terms of the NEM:AQA

Activity No(s):	Provide the relevant **Listed Activity(ies)**	Describe the portion of the proposed development to which the applicable listed activity relates.
Not Applicable.		

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.
A description of the preferred alternative is provided in Section 4.4 of Section B above.	
2.	Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21.
Erf 6482 is zoned as **Community 1: Local (CO1)** (see Figure 2). The CO1 zoning provides for local educational, worship and health needs as primary uses, but allowance is also made in terms of the City of Cape Town Municipal Spatial Planning By-law, 2015, as amended, for the city to approve other community needs which may have a greater impact (City of Cape Town, 2015). Given the proposed activity includes development of affordable housing, a rezoning application will be applied for by the Applicant to rezone the site to **Subdivisional Area** for the purposes of **'Residential 2 (R2)'**, **'Community Zone 1 (CO1)'** for the community facility/place of worship (~498 m^2), **'Open Space 2 (OS2)'** for the ~498 m^2 public park, coupled with other open spaces (total of all public open space amounting to ~10 075 m^2), and **'Transport Zone 2 (TR2)'** to accommodate the roads, sidewalks, and reserves, and Utility Zoning to accommodate the four substations and water pressure booster tank.	

[18] A wetland is considered a watercourse in terms of the National Water Act 36 of 1998.

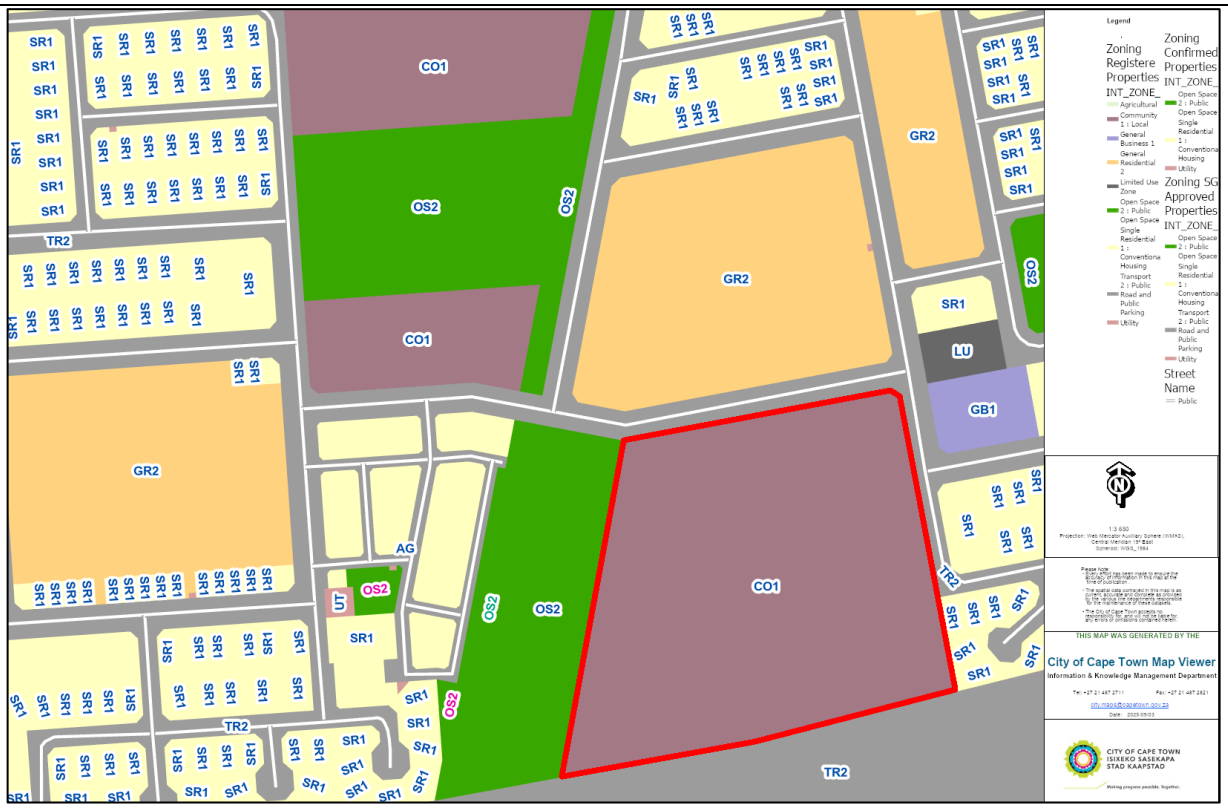

Figure 2: Zoning map - Erf 6482 illustrated in red (created using City of Cape Town Map Viewer)

3.	Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved.

Not applicable.

4.	Explain how the proposed development will be in line with the following?
4.1	The Provincial Spatial Development Framework.

The Western Cape Provincial Spatial Development Framework (PSDF) (2014) applies the principals of spatial justice, sustainability and resilience, spatial efficiency, accessibility and quality and liveability. Table 1 summarises the project's alignment with each of these guiding principles.

Table 1: The project's alignment with the Western Cape PSDF (2014) guiding principles

Guiding Principle	Project Alignment
Spatial Justice	As an affordable solution to housing, the project addresses past spatial imbalances by improving access to and use of land by disadvantaged communities.
Sustainability and resilience	The housing units will be arranged in a spatially compact manner (without compromising liveability) and the surrounding area comprises residential developments. Furthermore, the land comprising the site does not possess high agriculture potential, and the development will not compromise local ecosystems. Therefore, the project is compatible with the surrounding landscape and will not compromise the resilience of the local social and ecological systems.
Spatial efficiency	By accommodating more than ~300 housing units within a ~51 ha area, the project is designed with consideration given to compaction (as opposed to urban sprawl). The project is also located ~350 m west of the M17 road, allowing for adequate access to public transport for occupants of the development.
Accessibility	The project includes development of community facilities and green spaces, improving accessibility of these types of developments to the public. Additionally, the project includes the development of single-storey units, which may be specifically designed for qualifying individuals with mobility impairments.
Quality and liveability	The project layout includes distinct communal landmarks (public open space and community centres) while maintaining an orderly arrangement of living spaces. Community needs are met without compromising liveability.

4.2	The Integrated Development Plan of the local municipality.

The CoCT Integrated Development Plan (IDP) (2022) envisages a "*prosperous, inclusive and healthy city where people can see their hopes of a better future for themselves, their children and their community become a reality*". The IDP sets out a number of priorities to materialise this vision, one of them being the provision of housing. The IDP states that, as a matter of

urgency, the City of Cape Town must do everything it can to support the accelerated building of homes – an aspect that the project aligns with, should it be authorised.

4.3.	The Spatial Development Framework of the local municipality.

City of Cape Town Spatial Development Framework

The CoCT Municipal Spatial Development Framework (MSDF) (2023) specifies a number of commitments by made by the CoCT, including addressing spatial injustice and inequality (and avoiding the creation of new structural imbalances), focussing on inward growth and supporting the development of affordable housing. The project is located in Lotus River. Although not located within Cape Town's Central Business District (CBD), Lotus River is closer to the CBD than other suburbs on the outskirts of Cape Town and is connected to existing transport nodes. This contributes to the addressing spatial inequality, without creating new structural imbalances. Furthermore, Lotus River is already a built-up area, relatively close to central nodes, contributing towards inward growth of Cape Town. Lastly, the project, as an affordable housing development, can conform to affordable housing development policies.

Southern District Spatial Development Framework

The project supports spatial transformation through densification within the existing urban footprint; is located near existing economic nodes and transport nodes; and contributes to redressing social facility backlogs in the area. The Southern District Spatial Development Framework (2022)[19] encourages mixed-income housing in areas like Lotus River, which are well located in relation to business nodes and transport nodes, provided that the development integrates open space, stormwater management and green infrastructure – all elements which the project addresses.

4.4.	The Environmental Management Framework applicable to the area.

The project is not located in any sensitive areas delineated by the City of Cape Town Environmental Management Framework (EMF) (NCC Environmental Services (Pty) Ltd, 2025). Furthermore, no sensitive areas delineated in terms of the CoCT's Terrestrial Biodiversity Network (2025) are located within the site (see Figure 3).

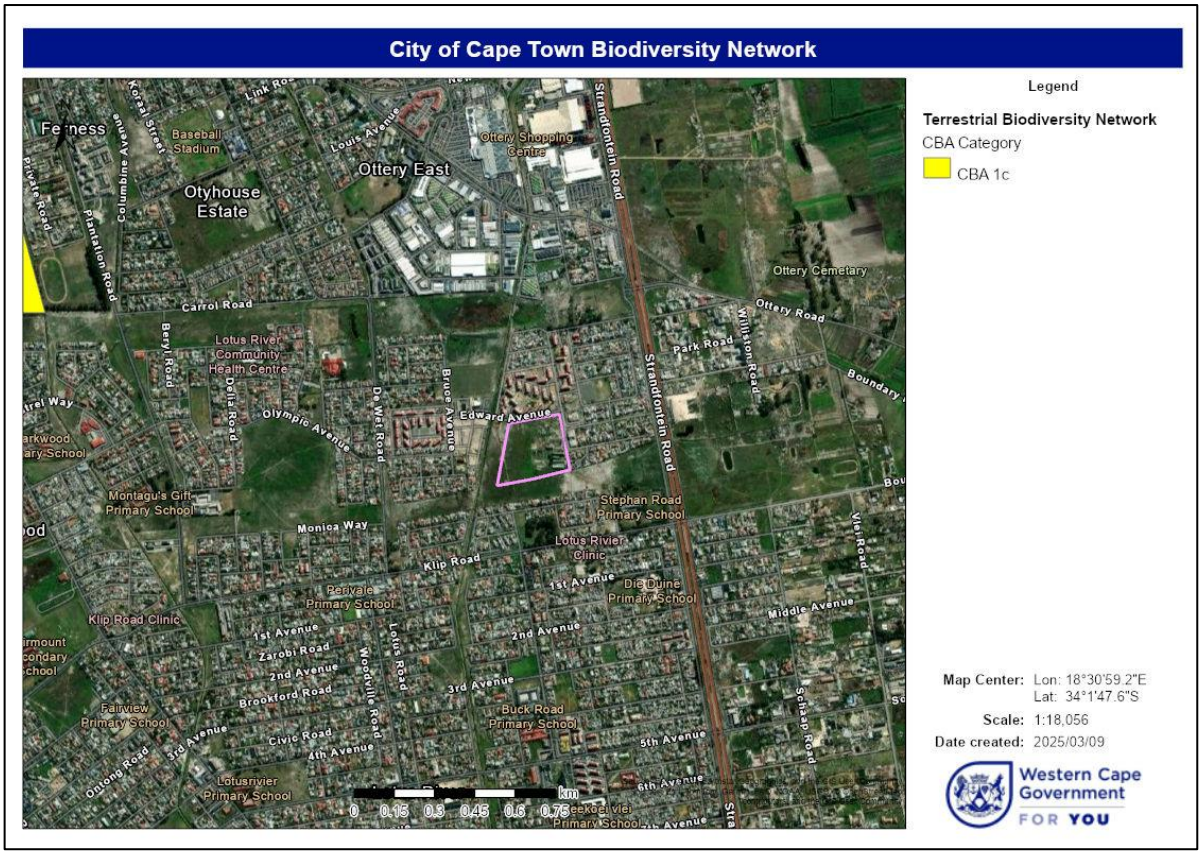

Figure 3: Erf 6482 (pink) and surrounding environmentally sensitive areas delineated by the CoCT Terrestrial Biodiversity Network (created using Cape Farm Mapper 3)

5.	Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.

In response to a Notification of Intent (NOI) form submitted to the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP), which included the submission of a SSVR that disputes the *Very High* sensitivity classification specified by the Screening Tool, DEA&DP indicated that a Terrestrial Biodiversity Compliance Statement must be compiled in terms of GN 320 of 2020 for the site. A terrestrial biodiversity specialist subsequently compiled a Compliance Statement

[19] The Southern District Spatial Development Framework has been formally adopted as part of the CoCT Spatial Development Framework.

(see Appendix G) and confirmed that the site is of *Low* terrestrial biodiversity sensitivity. Therefore, terrestrial biodiversity did not influence the project.

An Aquatic Biodiversity Impact Assessment was compiled for the site (see Appendix G). Details of how aquatic biodiversity and freshwater features influenced the project are provided in Section G.

No mitigation measures were proposed by the terrestrial biodiversity specialist. The mitigation measures proposed by the Aquatic Biodiversity specialist have been incorporated into the EMPr (see Appendix H).

Where feasible, comments with respect to biodiversity received by the relevant authorities during the public participation process will be considered and incorporated into the development.

6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development.

No protected areas, Critical Biodiversity Areas (CBA), Ecological Support Areas (ESA) and/or other designated conservation areas delineated in terms of the Western Cape Biodiversity Spatial Plan (WCBSP) (2023) are located within the site or in its immediate surroundings. Historically, the site was occupied by Cape Flats Sand Fynbos, a critically endangered vegetation type unique to Cape Town. However, ground truthing confirmed that the site is disturbed and no indigenous plant species were identified at the site (2025). Therefore, the WCBSP did not influence the project in terms of the development plan but has supported the terrestrial biodiversity specialist study (see Appendix G).

7.	Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.

Not applicable.

8.	Explain whether the screening report has changed from the one submitted together with the application form. The screening report must be attached as Appendix I.

A revised Screening Tool Report[20] was produced on 2 September 2025 (see Appendix I). The revised report did not present any changes to the one submitted with the NOI and/or application form.

9.	Explain how the proposed development will optimise vacant land available within an urban area.

The site is located in Lotus River on land which has historically been used for the operation of a school. Some buildings that were part of the school have been demolished and some remain on site. The (undemolished) buildings which remain on site are currently unlawfully occupied. Other parts of the site are used for informal dwellings and structures and the dumping of various forms of waste (general domestic waste, bricks and building materials and glass).

By constructing a housing development on the site, the project contributes to the broader goals of the CoCT's MSDF including urban densification, inward growth and efficient use of land, effecting growth within the Cape Town's existing urban footprint and reducing urban sprawl (another one of the CoCT's goals).

Using vacant land within urban areas leverages existing infrastructure. The project benefits from its close proximity to established rods and essential services such as water, sanitation and electricity, reducing the requirement for costly new infrastructure and maximising the use of existing service capacity.

10.	Explain how the proposed development will optimise the use of existing resources and infrastructure.

The site is located within a built-up urban environment, which contains electrical services and is surrounded by existing transport infrastructure. Existing water mains are located on Edward Avenue (north of the site) and Marius Road (east of the site) and an existing sewer outfall is located west of the site. Upgrades to these service systems are required to accommodate the project.

Existing stormwater reticulation pipes are located in Edward Avenue (north of the site) and Marius Road (east of the site). These reticulation pipes facilitate the discharge of stormwater into a concrete canalised section of the Big Lotus River located ~65 m west of the site.

11.	Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16).

Sufficient spare service capacity has been confirmed by the CoCT for water, sewer, refuse removal and electricity. Refer to **Appendix E16** for the relevant letters of confirmation.

12.	In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K.

According to the DEA&DP (March 2013) and DEA Integrated Environmental Management (IEM) Guidelines (2017), the Need and Desirability of an affordable housing development is an assessment of whether the development is necessary and suitable in the context of environmental, social and economic factors. The guidelines specify a criterion that should be met to maintain the environmental integrity and improve the well-being of the community while aligning with the principles of sustainable development. The need and desirability of an affordable housing development in Cape Town builds on the requirement to address the demand for affordable housing by low-income households. The sections below address the key questions posed by both guidelines.

[20] The site boundaries did not change between submission of the first Screening Tool Report (with the NOI form) and compilation of the revised Screening Tool Report.

DEA Guideline (2017)

- How will this development (and its separate elements/aspects) impact on the ecological integrity of the area?
  - The site is proposed to be located on a transformed urban site within the CoCT's urban edge. Direct ecological impacts are expected to be low relative to a greenfield development. These impacts can be reduced to acceptable levels through standard mitigation (construction-phase controls, erosion/stormwater management, reinstatement of soft landscaping and, where required, sensitive design to retain any locally valuable vegetation) and adherence to mitigation measures proposed by the various specialists (see Section H). This approach follows the mitigation hierarchy as set out in the guideline.
- How were the following ecological integrity considerations taken into account:
  - Threatened ecosystems / wetlands – terrestrial and aquatic specialist studies were undertaken for the project (see Appendix G). While the site has been verified to be of *Low* terrestrial biodiversity sensitivity, some wetlands are located on the site (see Section G). The mitigation measures proposed by the aquatic biodiversity specialist are included in the EMPr (see Appendix H).
  - CBAS / ESAs – No CBAs or ESAs delineated by the WCBSP (2023) and CoCT Biodiversity Spatial Plan (2025) are located within the boundaries of the site (NCC Environmental Services (Pty) Ltd, 2025).
  - Alignment with EMF / Spatial Development Framework – see item 4 of Section E.
- What is the level of risk associated with limits of current knowledge (uncertainties, knowledge gaps)?
  - Risk is moderate but manageable. Terrestrial and aquatic biodiversity specialist studies were undertaken (see Appendix G). A site visit by the respective specialists, as well as the EAP team, was undertaken to ascertain the current use of the land and site conditions.
- Based on the above, how will this development positively or negatively impact ecological integrity objectives/targets in the area?
  - See Section H for an assessment of impacts associated with the project.
- Considering the need to secure ecological integrity, describe how alternatives were identified and how the "best practicable environmental option" was selected.
  - See Section H which describes the selection of alternatives. An iterative approach was undertaken with regards to the site layout to avoid impacts on surrounding wetlands as far as possible.
- What is the socioeconomic context of the area, including relevant policies/planning instruments (IDP, SDF, EMF, etc.)?
  - See item 4 of Section E which summarises the relevant planning / policy instruments, and item 8 of Section G which summarises the socio-economic context of the area.
- How will the proposed development address specific physical, psychological, developmental, cultural and social needs of the relevant communities?
  - Physical needs – the project provides secure, formal housing of an appropriate standard, addressing overcrowding and inadequate shelter.
  - Psychological / social needs – the project includes community facilities that support social cohesion. The project will also improve safety in the area by developing formal housing on land that is currently unlawfully occupied.
  - Developmental needs – proximity to public transport, schools (seven schools are located within ~1 km of the site) and local economic nodes improves access to work and education. The development therefore addresses needs beyond shelter alone.
- Will the development result in equitable distribution of benefits and impacts, and will it be socially/economically sustainable?
  - Yes. the project will provide housing targeted at lower income groups and will provide jobs to the local population and opportunities for local procurement during the construction phase. Long-term sustainability will be supported by linking residents to nearby services and public transport, reducing household transport costs and improving access to employment.
- In terms of location: how does placement help with (a) creating nearby opportunities, (b) reducing transport needs, (c) access to public/non-motorised transport, (d) optimising existing infrastructure, (e) using under-utilised urban land?
  - (a) The site is near public transport routes local commercial nodes and services, increasing local opportunity access.
  - (b) As the site is within an urban area, commute distances for some residents are reduced compared to housing developments located on the urban periphery.
  - (c) Proximity to established public transport routes and pedestrian networks supports use of non-motorised and public transport.
  - (d) The development will utilise existing bulk and municipal services (water, sewer, electricity), reducing the need for costly new infrastructure extensions.
  - (e) The project repurposes under-utilised strategically located state owned urban land inside the urban edge.
- What are the positive and negative socio-economic impacts, also in relation to environmental rights (health, wellbeing, safety)?
  - Positive: provision of formal / permanent housing, addressing the housing backlog, improved sanitation and services, construction jobs, reduced overcrowding, potential reductions in transport costs and improved access to schooling. These benefits contribute to improving the constitutional environmental rights of the project's residents (clean and healthy environment, adequate housing).
  - Negative (manageable): short-term construction nuisances (noise, dust, traffic), potential localised pressure on social services if population increases faster than service expansion. These impacts can be mitigated by implementing

construction management plan, phased occupation and coordinating with municipal departments to manage demand.

- How will economic and social development objectives be met (job creation, local economic development, skills)?
  - The project will include local labour targets during construction, small business / small, medium and micro enterprise (SMME) procurement clauses and opportunities for upskilling (e.g., masonry, plumbing) linked to contracts. Operational phase opportunities include local management and maintenance within the development.
- What measures have been taken to ensure responsibility for environmental health and safety consequences throughout the life cycle?
  - The following measures will be implemented to ensure that responsibility is allocated appropriately:
    - An EMPr which specifies clear roles and responsibilities;
    - Contractor environmental specifications;
    - Stormwater management plans; and
    - A complaints/incident reporting system.

DEA&DP Guideline (March 2013)

- Is the development the best practicable environmental option for this land/site?
  - Yes. The project makes efficient use of already disturbed land and avoids sensitive ecological areas.
- Would the development compromise the integrity of the municipal IDP, SDF or other planning documents?
  - No. The project is consistent with the CoCT's IDP, MSDF, and the Southern District SDF (see item 4 of Section E).
- Would the development compromise the integrity of environmental management priorities (EMF, biodiversity plans, etc.)?
  - No. The site is not located within a CBA or ESA as identified in the WCBSP (2023).
- How will the development address pressing community needs and priorities?
  - The project will contribute to addressing the housing backlog, alleviate overcrowding, and provide secure tenure, which is a critical social need in Lotus River.
- How will the development contribute to national, provincial and municipal development priorities?
  - The project advances key housing, sustainability, and equity objectives at all levels of government, from the National Development Plan (2011) to the CoCT's IDP.
- How will the development address the 'social function' of land?
  - The project redistributes land use for inclusive purposes, providing opportunities for low- to middle-income households to access formal housing in a well-located area.
- How will the development ensure sustainable land use?
  - The project supports densification, uses existing infrastructure and avoids unnecessary expansion of the urban footprint.
- How will the development impact on sense of place, heritage, cultural landscapes, and scenic resources?
  - The site is consistent with the surrounding residential character of Lotus River. No significant heritage or cultural landscape resources will be affected.

Conclusion

The project is both needed (to address the housing backlog and socio-economic vulnerability in Lotus River) and desirable (due to its alignment with planning frameworks, sustainable land use, and limited environmental sensitivity). It therefore meets the requirements of both the DEA IEM Guideline (2017) and the DEA&DP Guideline on Need and Desirability (March 2013).

SECTION F: PUBLIC PARTICIPATION

The Public Participation Process ("PPP") must fulfil the requirements as outlined in the NEMA EIA Regulations and must be attached as Appendix F. Please note that If the NEM: WA and/or the NEM: AQA is applicable to the proposed development, an advertisement must be placed in at least two newspapers.

1. Exclusively for linear activities: Indicate what PPP was agreed to by the competent authority. Include proof of this agreement in Appendix E22.

Not applicable as the proposed development is not linear.

2. Confirm that the PPP as indicated in the application form has been complied with. All the PPP must be included in Appendix F.

As agreed with DEA&DP, the application form will be submitted after an initial round of public participation is conducted during the pre-application phase ('pre-application PPP' – current phase). Nonetheless, the pre-application public participation process (PPP) meets the requirements of PPP specified in the EIA Regulations, 2014, as amended, including:

- Advertising the project in the *People's Post* newspaper;
- Erecting A2-sized site notification posters at conspicuous locations around the site boundary;
- Releasing the Draft BAR (this report) for comment from 11 November 2025 to 11 December 2025 (30 days);
- Making hard copies of the Draft BAR (this report) available for public review at:
  - Subcouncil 18 office (Corner of Buck Road and 6th Avenue, Lotus River, 7941); and
  - Chand Consultants' offices in Plumstead, Cape Town;
- Providing written notification to potential interested and affected parties (IAP) (via email and post [to potential IAPs who do not have email addresses]) about the availability of the Draft BAR (this report) for public comment; and
- Dropping letters at adjacent properties and properties within a two block radius (where contact information is not available).

The formal PPP (i.e., PPP to be conducted after formal submission of the application form) will follow the same PPP process as indicated above. However, as the project will require a Water Use Licence (WUL), the formal PPP will include a 60-day (rather than a 30-day) comment period to make provision for the PPP requirements specified in GN R267 of 2017, as amended (*Water Use Licence Application and Appeals Regulations*). All documentation related to the formal PPP (e.g., newspaper adverts, letters etc) will include the details of both the EA application and WUL application.

3. Confirm which of the State Departments and Organs of State indicated in the Notice of Intent/application form were consulted with.

All state departments and organs of state indicated in the NOI and application forms have been notified that the Basic Assessment Report (BAR) is available for comment. Should any state department not comment on the BAR within the comment period, it will be assumed that that state department has no comments[21].

The following state departments were notified about the availability of the BAR for comment:

- Western Cape Department of Environmental Affairs and Development Planning (DEA&DP);
- DEA&DP: Pollution and Chemical Management – Remediation and Emergency Incident Management;
- DEA&DP: Waste Management;
- Western Cape Department of Infrastrucutre (Branch: Public Works and Branch: Human Settlements);
- Department of Forestry, Fisheries and the Environment (DFFE);
- Department of Water and Sanitation;
- Western Cape Department of Roads;
- Ward Councillor (Ward 66);
- Subcouncil 18;
- City of Cape Town (CoCT) Department of Urban Mobility;
- CoCT Biodiversity Management Branch;
- CoCT Spatial Planning and Environment Directorate;
- CoCT Department of Environmental Management;
- CoCT Department of Solid Waste Management;
- CoCT Department of Air Quality;
- CoCT Department of Parks and Recreation;
- CoCT Department of Public Housing;

[21] Regulation 3(4) of the EIA Regulations, 2014, as amended, states that if a state department fails to comments within 30 days of the date that they were requested to provide a comment, it can be assumed that the state department has no comments.

- CoCT Department of Human Settlements Planning;
- CoCT Department of Development Management;
- CoCT District Programme – Housing Implementation;
- CoCT Department of Informal Settlements, Water and Waste Services;
- SANParks;
- South African National Biodiversity Institute (SANBI);
- CapeNature; and
- Heritage Western Cape (HWC).

4. If any of the State Departments and Organs of State were not consulted, indicate which and why.

The following state departments and organs of state are not considered relevant to the scoped of the project and have not been consulted or notified about the availability of the BAR:

- DFFE: Oceans and Coasts;
- DEA&DP: Coastal Management; and
- Western Cape Department of Agriculture.

5. if any of the State Departments and Organs of State did not respond, indicate which.

A list of State Departments and Organs of State who did not respond will be included in the post-application BAR and Final BAR submitted to the competent authority.

6. Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues were incorporated into the development proposal.

As this report is currently available for public review and comment, no issues have been raised thus far. Issues raised during the pre-application PPP will be included in the post-application BAR and the Final BAR. The post-application BAR and the Final BAR will also include a Comments and Responses Report.

Note:

A register of all the I&AP's notified, including the Organs of State, and all the registered I&APs must be included in Appendix F. The register must be maintained and made available to any person requesting access to the register in writing.

The EAP must notify I&AP's that all information submitted by I&AP's becomes public information.

Your attention is drawn to Regulation 40 (3) of the NEMA EIA Regulations which states that *"Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but **must** be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority."*

All the comments received from I&APs on the pre -application BAR (if applicable and the draft BAR must be recorded, responded to and included in the Comments and Responses Report and must be included in Appendix F.

All information obtained during the PPP (the minutes of any meetings held by the EAP with I&APs and other role players wherein the views of the participants are recorded) and must be included in Appendix F.

Please note that proof of the PPP conducted must be included in Appendix F. In terms of the required "proof" the following is required:

- a site map showing where the site notice was displayed, dated photographs showing the notice displayed on site and a copy of the text displayed on the notice;
- in terms of the written notices given, a copy of the written notice sent, as well as:
  - if registered mail was sent, a list of the registered mail sent (showing the registered mail number, the name of the person the mail was sent to, the address of the person and the date the registered mail was sent);
  - if normal mail was sent, a list of the mail sent (showing the name of the person the mail was sent to, the address of the person, the date the mail was sent, and the signature of the post office worker or the post office stamp indicating that the letter was sent);
  - if a facsimile was sent, a copy of the facsimile Report;
  - if an electronic mail was sent, a copy of the electronic mail sent; and
  - if a "mail drop" was done, a signed register of "mail drops" received (showing the name of the person the notice was handed to, the address of the person, the date, and the signature of the person); and
- a copy of the newspaper advertisement ("newspaper clipping") that was placed, indicating the name of the newspaper and date of publication (of such quality that the wording in the advertisement is legible).

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. Groundwater

1.1.	Was a specialist study conducted?	YES	~~NO~~
1.2.	Provide the name and or company who conducted the specialist study.		
Zita Harilall (GEOSS South Africa (Pty) Ltd)			
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
The site is underlain by the Cape Flats Aquifer, which presents a high yielding potential and good water quality. Localised contamination of the aquifer is likely due to the highly permeable nature of the aquifer's geology and the shallow water table. Although the aquifer is considered to have a very high vulnerability to point source contamination, the project is assessed to have a low impact on groundwater if the mitigation measures specified by the specialist are adhered to (GEOSS, 2024).			
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.		
Depth to groundwater at the site is 4.91 meters below ground level (mbgl) (Department of Water and Sanitation, 2005). See item 1.3 above which summarises the influence of groundwater and the aquifer on the project.			

2. Surface water

2.1.	Was a specialist study conducted?	YES	~~NO~~
2.2.	Provide the name and/or company who conducted the specialist study.		
Dr Elizabeth Day from Liz Day Consulting conducted the Aquatic Biodiversity Impact Assessment.			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		

Extensive seasonal wetlands in good conditions are located just outside the southern boundary of the site (see Figure 4). These wetlands are seasonally saturated to inundated depressions and support various indigenous wetland plants and animal species including *Aponogeton angustifolious* delicate Cape-pondweed (Near Threatened [NT])[22] (see Figure 5), *Anas undulata* yellow-billed duck (LC)[23] and *Ardea cinerea* grey heron (LC). Patches of seasonally saturated wetlands dominated by *Juncus kraussii* matting rush (LC) are located just outside the western boundary of the site (see Figure 6). The Big Lotus River[24] flows further west of these wetlands.

Large areas of seasonally inundated and saturated wetlands are present within the site (although much of the site has been infilled) (see Figure 4). Some of the seasonally inundated wetlands have been excavated, forming artificial depressions and presenting poor water quality (Liz Day Consulting, 2025).

The project will be developed over all the wetlands at the site, but includes adequate provision of infrastructure to manage stormwater runoff. The layout will include a minimum 20 m setback buffer from the wetland outside of the southern boundary of the site, ensuring that no hard infrastructure will be located within 20 m of this wetland. Portions of the buffered area will be used for development of swales. Two swales and a detention pond will be constructed in the open area in the western portion of the site (see Figure 1).

Figure 4: Wetlands at the site (Liz Day Consulting, 2025)

[22] In terms of the International Union for Conservation of Nature Red List of Threatened Species (2025).
[23] Least Concern in terms of the BirdLife International Red Data Book (BirdLife South Africa, 2025).
[24] The Big Lotus River is concrete and canalised in these reaches, enabling the river to contain big floods (Liz Day Consulting, 2025).

Figure 5: Delicate Cape-pondweed south of the site (Liz Day Consulting, 2025)

Figure 6: Matting rush west of the site (Liz Day Consulting, 2025)

Figure 7: Canalised section of the Big Lotus River west of the site (Liz Day Consulting, 2025)

3. Coastal Environment

3.1.	Was a specialist study conducted?	~~YES~~	NO
3.2.	Provide the name and/or company who conducted the specialist study.		
Not applicable.			
~~3.3.~~	~~Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.~~		
Not applicable.			

~~3.4.~~	~~Explain how estuary management plans (if applicable) has influenced the proposed development.~~
	Not applicable.
~~3.5.~~	~~Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.~~

4. Biodiversity

4.1.	Were specialist studies conducted?	YES	~~NO~~
4.2.	Provide the name and/or company who conducted the specialist studies.		
Sean Altern of NCC Environmental Services (Pty) Ltd compiled a Terrestrial Biodiversity Compliance Statement (see Appendix G).			
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		

Strategic Water Source Areas

The site is located within the Table Mountain Strategic Water Source Area (SWSA)[25]. The Table Mountain SWSA spans most of the Cape Town Metropole, which includes large built-up and transformed areas where the level of biodiversity can be non-existent. Therefore, the Table Mountain SWSA is regarded as a very broad scale spatial data feature that is not deemed significant in this case given that the site is located in an urbanised area (NCC Environmental Services (Pty) Ltd, 2025). Therefore, the SWSA has no influence on the project.

South African National Biodiversity Institute Red List of Ecosystems

The South African National Biodiversity Institute (SANBI) Red List of Ecosystems is a dataset which contains the historical / potential extent of 458 ecosystem types in South Africa. Each ecosystem is categorised into one of four classes which represent their risk of collapse (see Figure 8): Extinct (EX), Extinct in the Wild (EW), Critically Endangered (CR), Endangered (EN), Vulnerable (VU), Near Threatened (NT) and Least Concern (LC). The dataset is based on the International Union for Conservation of Nature (IUCN) Red List risk assessment framework (NCC Environmental Services (Pty) Ltd, 2025).

Figure 8: IUCN Red List categories (Snow Leopard Trust, 2017)

The site is located in a region which historically comprises CR Cape Flats Sand Fynbos. However, ground truthing[26] confirmed that vegetation remnant of the CR Cape Flats Sand Fynbos vegetation type is no longer present at the site due to consistent negative impacts and a lack of positive vegetation drivers. The site is regarded as a transformed environment comprising almost exclusively of exotic species such as a grassy field (NCC Environmental Services (Pty) Ltd, 2025). Therefore, the SANBI Red List of Ecosystems has no influence on the project.

Western Cape Biodiversity Spatial Plan

See item 6 of Section E. The WCBSP has no influence on the project.

City of Cape Town Biodiversity Spatial Plan

No sensitive areas delineated in terms of the CoCT's Terrestrial Biodiversity Network (2025) are located within the site (see Figure 3). Therefore, the CoCT's Terrestrial Biodiversity Network has no influence on the project.

4.4.	Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.

The site is not located within a CBA, ESA or any other designated conservation area in terms of the WCBSP or the CoCT Biodiversity Spatial Plan. Furthermore, the site is not located within protected areas as defined by the National Environmental Management: Protect Areas Act 57 of 2003 (NEM:PAA), CapeNature or SANBI. Historically, the site was occupied by CR Cape Flats Sand Fynbos. However, ground truthing confirmed that the site is significantly disturbed and no indigenous vegetation is present at the site. Therefore, the WCBSP has no influence on the project (NCC Environmental Services (Pty) Ltd, 2025).

4.5.	Explain what impact the proposed development will have on the site specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development.

The site is located in an area that was historically occupied by CR Cape Flats Sand Fynbos. However, ground truthing confirmed that the site has been severely degraded with no remnants of indigenous vegetation remaining and that no Species of Conservation Concern (SCC) are present at the site. The site has been significantly transformed due to anthropogenic influences, such as dumping, which has reduced the land's capacity for natural vegetation regeneration. Furthermore,

[25] SWSAs refer to the 10% of South Africa's land area that provides a disproportionate 50% of the country's water runoff (Lötter, 2021).
[26] A process of gathering and confirming data from the real world to verify remotely collected data (NCC Environmental Services (Pty) Ltd, 2025).

indigenous vegetation is unlikely to survive under current conditions at the site as it lacks positive vegetation drivers (NCC Environmental Services (Pty) Ltd, 2025).

No specific mitigation measures are required to address terrestrial plant species loss (NCC Environmental Services (Pty) Ltd, 2025). However, general measures to manage biodiversity loss are included in the Environmental Management Programme (EMPr).

The low terrestrial biodiversity sensitivity ascribed to the site is in alignment with the WCBSP and CoCT Biodiversity Spatial Plan as discussed in the preceding section and confirms the acceptability of the site project, which will not impact any terrestrial biodiversity of conservation importance.

4.6.	If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.

Not applicable. The site is not located in a protected area.

4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.

The EN Western leopard toad *Sclerophyrs pantherine* is endemic to the Western Cape Province and are prevalent in the Cape Flats region, including the Grassy Park area, Zeekoevlei, Rondevlei and Bamboesvlei (City of Cape Town, 2024; City of Cape Town, n.d.; Liz Day Consulting, 2025). Suitable habitat for this species includes seasonal wetlands, ponds and slow-moving streams. The species' breeding pattern is synchronised with late winter to early spring rains. The species required ephemeral water bodies (shallow, still ponds or flooded depressions) that persist long enough for tadpoles to develop.

The wetlands south of the site (see item 2.3 of Section G) are shallowly inundated in the wet season, but dry out by October / November. Therefore, these wetlands are unlikely to remain inundated for long enough periods to support tadpoles of this species through their full growth period. Other fauna likely to be found in these wetlands include zooplankton and other insect taxa (Liz Day Consulting, 2025).

The project layout will include a 20 m setback buffer from these wetlands, ensuring that no hard infrastructure will be located within 20 m of this wetland. In addition, standard mitigation measures are integrated into the EMPr (e.g., strategies to manage drainage to avoid adverse impacts on nearby habitats – see Appendix H to address potentially remaining local fauna.

Figure 9: Seasonal wetlands south of the site (beyond the site boundaries) (Liz Day Consulting, 2025)

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.
A Tree Survery was conducted in January 2025 for the site (see Appendix O). Eleven trees were identified at the site, all of which are located around the old school buildings in the southeastern portion of the site. Of the 11 trees identified, seven are *Schinus terebinthifolius* Brazilian pepper trees in poor condition[27]. Other invasive trees identified at the site include a *Platunus* x *acerfolia* London plane tree, *Cypress* conifer tree and *Syzygium cordatum* water berry tree[28]. There are no other significant geographical aspects to consider. The selection of the site has been guided by the planning team of the Applicant, specifically identified as conducive for supporting a low-cost housing development.

[27] The Brazilian pepper tree is an invasive species.
[28] The water berry tree is an invasive species in the Western Cape.

6. Heritage Resources

6.1.	Was a specialist study conducted?	~~YES~~	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
Not applicable.			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
	Not applicable.		

7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.
No culturally or historically significant elements will be impacted by the project. This was confirmed in the formal response from the heritage authority (Heritage Western Cape [HWC])) dated 21 February 2025 to the Notice of Intent to Develop (NID) that was submitted for the project (see Appendix E1).

8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.

The site is located in Ward 66, Sub-council 18 within the suburb of Lotus River. On its own, Lotus River constitutes a sub-place[29]. The sections below are based on 2011 census data[30] (see Figure 10).

Figure 10: Spatial extent of Lotus River (SDI&GIS, 2013)

Demographics

Lotus River has a population of 38 143, making up 8 895 households with and average size of 4.29 people per household. The largest segment of the population is coloured (~93%), with Black Africans making up the second largest segment (3.7%) and whites making up the smallest segment (0.3%) of the population. There are marginally more females (51.8% of the population) than males (48.2% of the population) living in Lotus River (see Table 2) (SDI&GIS, 2013).

Table 2: Demographic profile of Lotus River (SDI&GIS, 2013)

Race	Male		Female		Total	
	No.	%	No.	%	No.	%
Black African	708	1.9	692	1.8	1 400	3.7
Coloured	16 943	44.4	18 380	48.2	35 323	92.6

[29] A smaller geographic area that forms part of a larger region (i.e., Lotus River is a sub-place of the bigger allotment of Grassy Park).
[30] Data at the community level collected for the 2022 census was not available at the time of writing this report.

Asian	146	0.4	154	0.4	300	0.8
White	62	0.2	56	0.1	118	0.3
Other	531	1.4	472	1.2	1 003	2.6
Total	**18 390**	**48.2**	**19 754**	**51.8**	**38 144**	**100**

Almost half of the population (49%) is made up of 25 to 64 year olds, with 15 to 24 year olds and 5 to 14 year olds also making up a large portion of (17.5% and 16.3%, respectively). People over the age of 65 make up the smallest segment of the population (7.6%) (see Figure 11) (SDI&GIS, 2013).

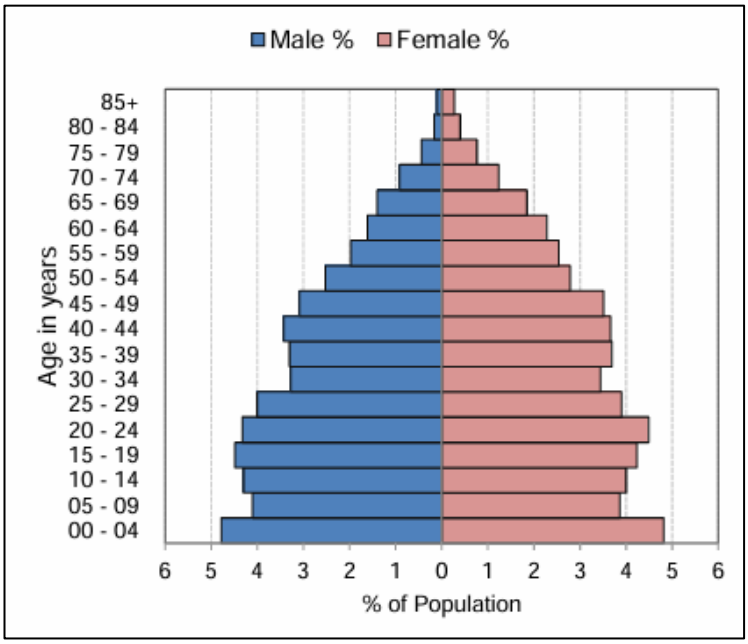

Figure 11: Population age pyramid for Lotus River (SDI&GIS, 2013)

Education

Of the individuals aged 20 years and older, 36% have completed grade 12 or obtained higher education. 7.1% of individuals aged 20 years and older completed primary school and 1.3% have never attended school (SDI&GIS, 2013).

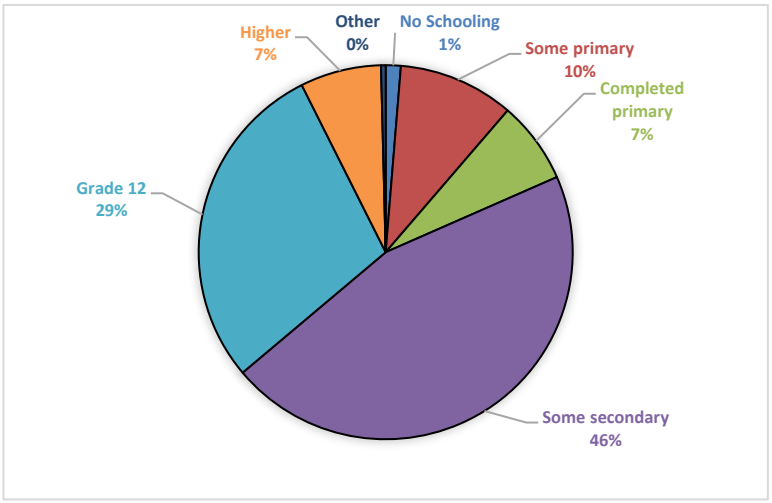

Figure 12: Education of individuals aged 20 and older in Lotus River (SDI&GIS, 2013)

Workforce

Most of the working age population[31] is employed (~80%). Of the unemployed work force, 8.5% are discouraged work seekers. The overall unemployment rate is 19.53%, and the labour absorption rate[32] is 49.92%. The labour participation rate[33] is 62.03% (SDI&GIS, 2013).

[31] According to Statistics South Africa, the working age population ranges from 15 to 64 years old.
[32] Proportion of the working age population that is employed.
[33] Proportion of the working age population that is either employed or unemployed.

Income and Home Ownership

Approximately 40% of households in Lotus River have a monthly income of R 3 200 or less. Approximately 20% of households have a monthly income ranging from R 3 201 to R 6 400, and ~18% of households have an income ranging from R 6 401 to R 12 800. Approximately 8.5% of households have no income (SDI&GIS, 2013).

Table 3: Monthly household income in Lotus River (SDI&GIS, 2013)

Monthly Household Income (R)	Percentage of Households (%)
No income	8.5
1 – 1 600	14.1
1 601 – 3200	16.3
3 201 – 6 400	20.1
6 401 – 12 800	18.2
12 801 – 25 600	14.2
25 601 – 51 200	6.1
51 201 – 102 400	1.1
102 401 or more	0.4

Almost all (~96%) of households reside in formal dwellings while ~2% of households reside informal backyard dwellings. Approximately 0.6% of households reside in informal dwellings not in backyards. Most households (~40%) reside in rented dwellings. Only 30% of households reside in dwellings that they own and is fully paid off. Approximately 25% of households reside in dwellings that they own but have not yet paid off (SDI&GIS, 2013).

Service Access

Almost all (~99%) of households have access to piped water either in their dwelling (~94%) or their yard (~5%). Approximately 97% of households have access to a flush toilet connected to the public sewer system and more than 99% of households have their refuse removed at least once per week.

Almost all (99%) of households use electricity for lighting in their dwelling. Approximately 90% of households use electricity for cooking (9.1% use gas). Approximately 74% of households use electricity for heating (~22% do not use energy for heating) (SDI&GIS, 2013).

8.2.	Explain the socio-economic value/contribution of the proposed development.

More than 400 000 people in Cape Town are on a 'housing waiting list' and half of all households in Cape Town earn less than R 20 700 per month (Steyn & Hirsch, 2025; StatsSA, 2023). The CoCT, through policies such as BNG and FHF, has promised to accelerate the provision of housing units to these low-income households. However, there is a serious delay in provision of these housing units, with only 0.6% of the backlog addressed in 2024/2025 so far (GOOD, 2025).

The goal of the project is to provide affordable housing solutions to low-income households. Through provision of housing through BNG and/or FHF models, the project will contribute to addressing the demand for housing in Cape Town.

8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.

The project will include the development of community facilities that will serve the social and recreational needs of residents. These facilities will include a park, religious building or community centre and an ECD centre (if enough space is available).

8.4.	Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development.

Construction Phase

The project may negatively impact the health and well-being of occupants of adjacent properties due to the increased emissions of dust and noise levels during construction. Construction activity, equipment and incomplete structures will also cause temporary changes to the sense of place, however this impact will be resolved once all three phases of development have been completed. Lastly, construction activities may pose risks to health and safety. These risks will be reduced by complying with occupational health and safety regulations, securing access to the construction site and erecting signage at appropriate locations.

These impacts are short-term (temporary), manageable and reversible and can be kept within acceptable limits through implementation of standard mitigation measures specified in the EMPr (see Appendix H).

Operational Phase

The type of housing associated with the proposed project does not entirely align with the type of housing and residential units present in the surrounding area. Therefore, the project may result in a loss of sense of place.

Positive impacts (including the provision of housing in a well-connected area) will counterbalance this negative impact.

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. Details of the alternatives identified and considered

1.1.	Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred property and site alternative.

See item 4.4 of Section B for a detailed description of the preferred property and site alternative.

Provide a description of any other property and site alternatives investigated.

Erf 6482 has been earmarked for development of affordable housing. Therefore, no property and/or site alternatives have been considered.

With input from an Aquatic Biodiversity specialist, the site layout underwent various iterations. In addition to the preferred layout ('preferred alternative' – see Figure 1), an alternative layout was also considered ('Alternative 1' – see Figure 13). Alternative 1 comprises 319 units, ~ 70% of which will be two-storey walk-up units, 26% of which will be single-storey units and 2% of which will be veteran units. Alternative 1 comprises slightly more two-storey and veteran units and less single-storey units than the preferred alternative. The additional two-storey units in Alternative 1 are located along the southern and western boundaries of the site. However, these have been relocated/removed in the preferred alternative to mitigate the risk of dumping in the open spaces around the wetlands around the site, as recommended by the Aquatic Biodiversity specialist (see Figure 4). The layout of internal roads has subsequently been reconfigured to accommodate access to the housing units for the preferred alternative.

Besides the reconfiguration of the number and location of housing units and the internal road layout, Alternative 1 will comprise the same components in the same locations as the preferred alternative (i.e., community facilities [pocket park, religious building and ECD centre, should enough space be available], stormwater infrastructure, landscaping and service infrastructure). Alternative 1 will also be developed in three phases.

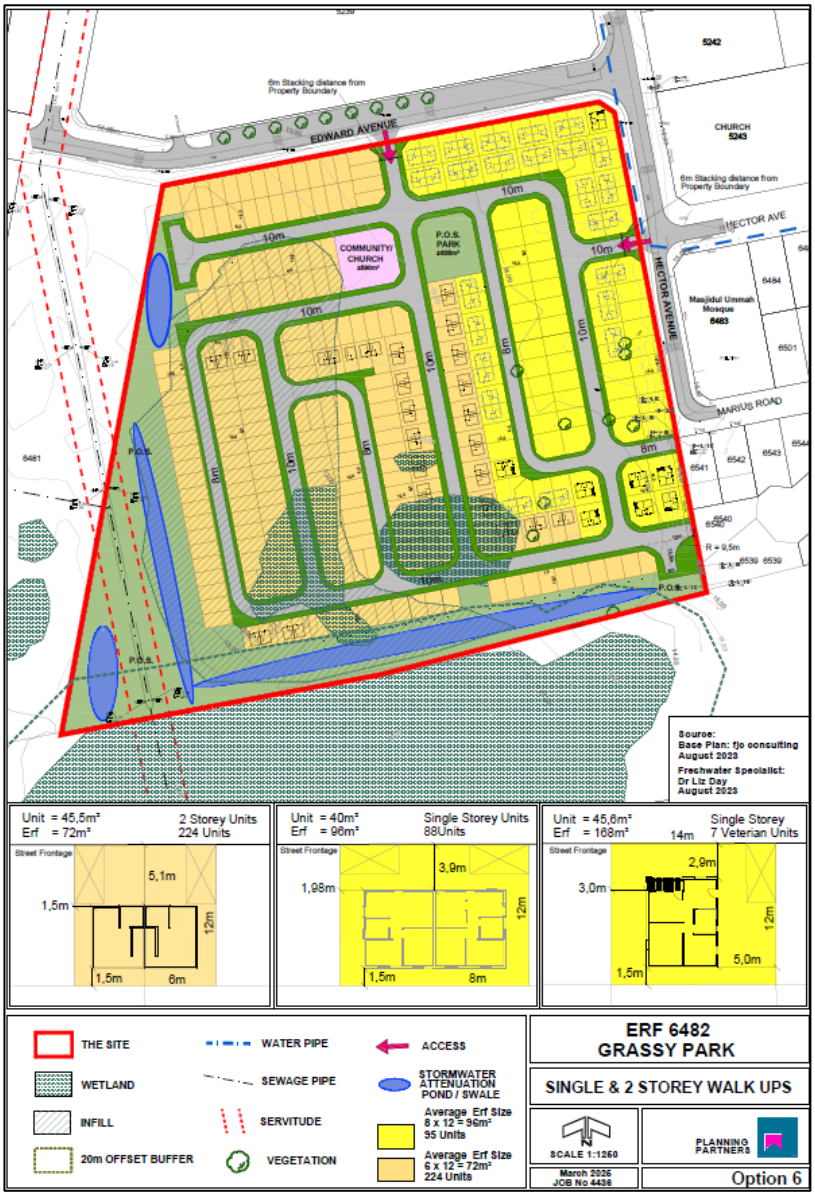

Figure 13: Alternative 1 Concept Development Plan (source: Planning Partners, 2025)

Provide a motivation for the preferred property and site alternative including the outcome of the site selection matrix.	
Erf 6482 is under the custodianship of the Western Cape Government via the DoI and has been earmarked for the development of affordable housing solutions. Therefore, no property alternatives are considered. The section above summarises the iterative layout design process that was undertaken in consultation with an Aquatic Biodiversity specialist to avoid sensitive freshwater features.	
Provide a full description of the process followed to reach the preferred alternative within the site.	
Refer to the above section which summarises the iterative layout design process that was undertaken in consultation with an Aquatic Biodiversity specialist to avoid sensitive freshwater features.	
Provide a detailed motivation if no property and site alternatives were considered.	
Erf 6482 is under the custodianship of the Western Cape Government via the DoI and has been earmarked for the development of affordable housing solutions. Therefore, no property alternatives are considered.	
List the positive and negative impacts that the property and site alternatives will have on the environment.	
The impacts of the preferred alternative, Alternative 1 and the No-Go alternative has been assessed in detail in item 4 of Section H.	
1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred activity alternative.	
The preferred and only activity includes development of affordable housing on Erf 6482, Lotus River. A full description of the project is provided in Section B.	
Provide a description of any other activity alternatives investigated.	
No alternative activities are considered.	
Provide a motivation for the preferred activity alternative.	
The project will provide affordable housing opportunities for up to ~318 low-income households in Cape Town, contributing to addressing a substantial housing allocation backlog in Cape Town. The site is located in an urban node and has adequate access to public transport (bus and taxi routes) and schools (seven within a ~1 km radius of the site).	
Provide a detailed motivation if no activity alternatives exist.	
Not applicable as technically the no-go alternative considers a different activity.	
List the positive and negative impacts that the activity alternatives will have on the environment.	
Not applicable as no activity alternatives are formally assessed.	
1.3.	Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts
Provide a description of the preferred design or layout alternative.	
Refer to Section B for a detailed description of the preferred alternative.	
Provide a description of any other design or layout alternatives investigated.	
Refer to Section 1.1 above for a detailed description of Alternative 1.	
Provide a motivation for the preferred design or layout alternative.	
The preferred alternative is technically feasible while providing approximately the same number of housing opportunities as Alternative 1. In addition, the preferred alternative avoids potential impacts sensitive freshwater features outside the site identified by an Aquatic Biodiversity specialist.	
Provide a detailed motivation if no design or layout alternatives exist.	
Not applicable.	
List the positive and negative impacts that the design alternatives will have on the environment.	
The impacts of the preferred alternative, Alternative 1 and the No-Go alternative has been assessed in detail in item 4 of Section H.	
1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred technology alternative:	
Residential development provides limited opportunity for technology alternatives. No formal assessment of technological alternatives was conducted; however, best practice measures regarding resource use efficiency will be implemented throughout the planning, construction, and operational phases of the project. These measures will be governed by the relevant specifications outlined in the EMPr (see Appendix H), as well as any conditions of authorization arising from the Basic Assessment process.	
Provide a description of any other technology alternatives investigated.	
Not technology alternatives have been considered.	

Provide a motivation for the preferred technology alternative.	
No technology alternatives have been considered.	
Provide a detailed motivation if no alternatives exist.	
As mentioned above, specifications have been included in the EMPr (see Appendix H) to provide for the most efficient use of resources.	
List the positive and negative impacts that the technology alternatives will have on the environment.	
This is not applicable given that no formal technology alternatives have been assessed, however the best practice measures included in the EMPr would serve to mitigate adverse impacts.	
1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred operational alternative.	
The preferred operational alternative comprises an affordable housing development on Erf 6482 (see Section B for a detailed description).	
Provide a description of any other operational alternatives investigated.	
No operational alternatives have been considered.	
Provide a motivation for the preferred operational alternative.	
Not applicable. No operational alternatives have been considered.	
Provide a detailed motivation if no alternatives exist.	
The purpose of the development is to provide affordable housing to the surrounding community and address the backlog of housing experienced within the City of Cape Town. Consequently, no operational alternatives exist that will address the above.	
List the positive and negative impacts that the operational alternatives will have on the environment.	
No operational alternatives were formally assessed. Therefore it is only the positive and negative impacts of the preferred alternative that would be relevant in this case.	
1.6.	The option of not implementing the activity (the 'No-Go' Option).
Provide an explanation as to why the 'No-Go' Option is not preferred.	
The No-Go Alternative implies the project does not go ahead, i.e., that no affordable housing will be development of the site, and the current unlawful activities will continue, and/or other activities not requiring authorisation may be pursued. Current activities taking place at the site include occupancy of informal dwellings, structures and the school buildings and dumping of waste (general domestic waste, bricks and building materials and glass). The No-Go Alternative is not preferred as the project will make a meaningful contribution to addressing the housing backlog in Cape Town, reducing the number of unlawful occupations and providing opportunities for homeownership to the surrounding community, aligning with the City of Cape Town's (CoCT) strategic objectives (see Section C). The project will also improve infrastructure development in the area (through development of non-motorised transport routes, road upgrades etc.), alleviate dumping on Erf 6482 and make valuable socio-economic contributions to the area.	
1.7.	Provide and explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.
Besides the preferred alternative, Alternative 1 and the No-Go Alternative, no other alternatives are considered.	
1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.
The preferred alternative (optimised layout to avoid environmental sensitivities) includes the development of affordable housing on Erf 6482. The preferred alternative seeks to create a quality living environment with provision of broad and relatively shallow erven. The placement of structures close to the street allows for the creation of a positive street interface, while still allowing available room for expansion of the structures. While it is acknowledged that the project will entail the infilling of the wetlands located within the site boundaries, the iterative design process of the layout avoids negatively impacting the freshwater features surrounding the site as far as possible.	

2. "No-Go" areas

Explain what "no-go" area(s) have been identified during identification of the alternatives and provide the co-ordinates of the "no-go" area(s).
The seasonal wetland south of the site has been identified as a no-go area (see Figure 14) and no development should take place in this area. During the construction phase, it is recommended that the edge of the edge of the wetland be buffered by 20 m, and temporary fencing[34] should be constructed 10 m from the edge of the wetland. The fencing should be highly visible to machine operators and prevent water borne sediment and wind-blown litter from accessing the wetland. Entrenched shade-cloth or wind-break netting is recommended (although alternatives that meet the same objectives would be supported. This recommendation is included in the EMPr.

[34] Temporary fencing should comprise robust fencing that prevents human access; is highly visible to machine operators; and prevents water borne sediment and wind-blown litter access (Liz Day Consulting, 2025).

Figure 14: No-go areas around the site

3. Methodology to determine the significance ratings of the potential environmental impacts and risks associated with the alternatives.

Describe the methodology to be used in determining and ranking the nature, significance, consequences, extent, duration of the potential environmental impacts and risks associated with the proposed activity or development and alternatives, the degree to which the impact or risk can be reversed and the degree to which the impact and risk may cause irreplaceable loss of resources.
The following specialist studies have been conducted: • Terrestrial Biodiversity Compliance Statement • Groundwater Impact Assessment; and • Aquatic Biodiversity Impact Assessment. These specialist studies have been conducted by reputable professionals with the aim of identifying potential environmental impacts of the proposed development, as well as measures to mitigate any environmental impacts. The assessment methods are deemed acceptable for the nature and scale of the development and comply with the relevant legislation and protocols for assessment and reporting of environmental impacts (i.e., GN 320 of 2020). Other (less significant) impacts have been assessed by the EAP. Furthermore, the scope of the study has been determined with reference to the requirements of the relevant legislation, namely the NEMA and the EIA Regulations, 2014, as amended. The main responsibilities of the EAP includes (but is not limited to) the following: • Submit of a Notice of Intent to DEA&DP to make them aware of the proposal and forthcoming application; • Consult with DEA&DP in the pre-application phase to highlight any key issues and/or requirements early in the process • Submit the required Application Form for Environmental Authorisation (EA) to DEA&DP, to register the proposed project, and obtain the applicable reference number; • Compile a Basic Assessment Report (BAR), describing the proposed activity, the affected environment, the potential environmental impacts, all applicable legislation and applicable guidelines, the detail of the public participation process followed, and the findings of the specialist studies and recommendations and/or mitigations measures to be implemented during construction and operation; • Release the BAR to the public for comment; • Consult the relevant authorities and stakeholders, through the BA process, to ensure that identification of relevant issues or concerns are undertaken; • Ensure that issues and comments raised by stakeholders during the public participation processes are responded to; and • Submit the Final BAR to DEA&DP for decision. A fundamental aim of a BA process is to ensure that the demands of sustainable development are met on a project level, within the context of the greater area. According to the 1987 report published by the Bruntland Commission titled 'Our Common Future', sustainable development is defined as "*development that meets the needs of the present without compromising the ability of future generations to meet their own needs*" (United Nations General Assembly, 1987). The BA for the affordable housing development in Lotus River is therefore being undertaken with sustainable development as a goal. The assessment has considered the impacts (negative and positive) of the project on the environment and the surrounding communities and assessed the significance of these. Mitigation measures to reduce negative impacts to acceptable levels and measures to enhance positive impacts are proposed. This is to ensure that the development makes "*equitable and sustainable use of environmental and natural resources for the benefit of present and future generations*" (Department of Environmental Affairs and Tourism, 1996).

The assessment criteria and methodology (see Appendix N) used is based on the requirements of NEMA and the EIA Regulations, 2014, as amended. The assessment criteria and methodology employed by each specialist have been indicated in the specialist reports (see Appendix N). The methods used have been carried out according to legal requirements and are considered sufficient for this purpose.

4. Assessment of each impact and risk identified for each alternative

Note: The following table serves as a guide for summarising each alternative. The table should be repeated for each alternative to ensure a comparative assessment. The EAP may decide to include this section as Appendix J to this BAR.

Alternative:	Preferred alternative	Alternative 1	No-Go Alternative
PLANNING, DESIGN AND DEVELOPMENT PHASE			
IMPACTS ON GROUNDWATER			
Potential impact and risk:	Reduction in available area for groundwater recharge		
Nature of impact:	Negative	Negative	N/A
Extent and duration of impact:	Local, long-term	Local, long-term	N/A
Consequence of impact or risk:	Decreased recharge into the local aquifer will result in a reduction of groundwater volumes.		N/A
Probability of occurrence:	Probable	Probable	N/A
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss	Marginal loss	N/A
Degree to which the impact can be reversed:	Fully reversible	Fully reversible	N/A
Indirect impacts:	• Loss of groundwater storage and decreased availability for groundwater users; and • Impacts on downstream wetlands and associated biodiversity.		N/A
Cumulative impact prior to mitigation:	*Medium (negative)*	*Medium (negative)*	N/A
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Medium (negative)*	*Medium (negative)*	No impact
Degree to which the impact can be avoided:	High	High	N/A
Degree to which the impact can be managed:	High	High	N/A
Degree to which the impact can be mitigated:	High	High	N/A
Proposed mitigation:	Allow for clean stormwater to be appropriately directed and allowed to infiltrate into the primary aquifer.		N/A
Residual impacts:	None	None	N/A
Cumulative impact post mitigation:	*Low (negative)*	*Low (negative)*	N/A

Alternative:	Preferred alternative	Alternative 1	No-Go Alternative
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Low (negative)*	*Low (negative)*	N/A
Potential impact and risk:	Groundwater contamination		
Nature of impact:	Negative	Negative	N/A
Extent and duration of impact:	Site specific, medium-term	Site specific, medium-term	N/A
Consequence of impact or risk:	Fuel and/or oil spills and/or leaks during construction may contaminate groundwater resources.		N/A
Probability of occurrence:	Probable	Probable	N/A
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss	Marginal loss	N/A
Degree to which the impact can be reversed:	Fully reversable	Fully reversable	N/A
Indirect impacts:	• Hydrocarbon contamination of the soil and/or groundwater could decrease water quality to dangerous levels for consumption and/or use, affecting other users and ecosystems in the area if the contamination mobilises; and • Impacts on downstream wetlands and associated biodiversity.		N/A
Cumulative impact prior to mitigation:	*Medium (negative)*	*Medium (negative)*	N/A
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Medium (negative)*	*Medium (negative)*	No impact
Degree to which the impact can be avoided:	High	High	N/A
Degree to which the impact can be managed:	High	High	N/A
Degree to which the impact can be mitigated:	High	High	N/A
Proposed mitigation:	• Maintain construction vehicles regularly and keep them in good working order. • Do not leave heavy equipment or vehicles on sands or open soils when not in use. • Park vehicles on hardstanding surfaces when not in use.		N/A

Alternative:	Preferred alternative	Alternative 1	No-Go Alternative
	• Place drip trays underneath vehicles that are not in use. • Capture and reuse dirty water where possible. • Do not discharge dirty water into the surrounding environment. • Monitor groundwater quality monthly throughout the construction phase. • Ensure that any activities with potential impacts on groundwater are appropriately conducted and that any spillages/events are responded to timeously.		
Residual impacts:	None	None	N/A
Cumulative impact post mitigation:	*Low (negative)*	*Low (negative)*	N/A
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Low (negative)*	*Low (negative)*	N/A
IMPACTS ON AQUATIC BIODIVERSITY			
Potential impact and risk:	Wetland loss		
Nature of impact:	Negative	Negative	N/A
Extent and duration of impact:	Local, permanent	Local, permanent	N/A
Consequence of impact or risk:	The development would result in the definite loss of the wetlands within the boundaries of the site (see Figure 4). Although the wetlands have been highly impacted by alien vegetation, dumping of solid waste, infilling and fragmentation, they still provide some ecosystem services. The combined wetland loss would be ~0.474 ha. The development will also result in the loss of the (more degraded) infilled wetland within the site boundary (see Figure 4), within which the other wetlands within the site boundary are nested. Although already impacted with landfill, this wetland area could be rehabilitated to form seasonal wetlands of far better condition and improved ecosystem functionality. This can be achieved by removing the infill, reshaping and establishing indigenous wetland plants in this area. However, this is considered unlikely given the location of the site, ownership and development pressures (Liz Day Consulting, 2025).		N/A
Probability of occurrence:	Definite	Definite	N/A
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss	Marginal loss	N/A
Degree to which the impact can be reversed:	Irreversible once development is constructed	Irreversible once development is constructed	N/A
Indirect impacts:	Possible knock-on impacts on adjacent sensitive wetlands	Possible knock-on impacts on adjacent sensitive wetlands	N/A

Alternative:	Preferred alternative	Alternative 1	No-Go Alternative
Cumulative impact prior to mitigation:	Negligible	Negligible	N/A
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Medium-High negative*	*Medium-High negative*	No impact
Degree to which the impact can be avoided:	None (if development proceeds)	None (if development proceeds)	N/A
Degree to which the impact can be managed:	None	None	N/A
Degree to which the impact can be mitigated:	Only through on-site compensation	Only through on-site compensation	N/A
Proposed mitigation:	There is no mitigation for the loss of wetlands. However, the following essential compensatory measures are recommended and must be implemented before the first phase of development (all swales and detention ponds must be constructed – even if not yet connected to upstream stormwater channels and pipes): • Maintain a 10 m gap between the southern boundary of the swale in the southern portion of the site and the edge of the seasonal wetland south of the site (i.e., the no-go area). • Place the swales in the western portion of the site within ~5 m of the western boundary of the site[35]. • Plant the swales with locally indigenous, hardy vegetation compatible with their locations abutting important seasonally inundated and rehabilitated wetlands (west of the site) with input from a botanist and wetland ecologist, informed by a detailed engineering design that considers the depth of the water table in the affected areas when establishing the swale depth. • Landscape the remaining area (by means of excavation of fill in of the infilled wetland) in the western portion of the site (excluding areas designated for the stormwater detention pond) to create seasonally inundated wetlands and a wetland area west of this that are: o Set at roughly the same level as those of the wetland south of the site (i.e., the no-go area). o Landscaped to create an area that resembles a mosaic of natural, shallowly inundated depressions (maximum 1:1 year wet season inundation of around 300 mm depth), interspersed by slightly higher lying mounds. o Planted with locally indigenous wetland vegetation, sourced from plant stock in the Zeekoe catchment, and dominated by *Juncus kraussii* plants, to achieve a density of 80% by area before site handover. o Reasonable compensation for the loss of wetland in the rest of the site. • The proposed retention pond should:		N/A

[35] The swales will serve as a defined edge to the development and a protective buffer for the wetlands beyond it.

Alternative:	Preferred alternative	Alternative 1	No-Go Alternative
	○ Include an accessible forebay for removal of sediment and solid waste (although it is assumed that most of this material would be collected in the swale systems). ○ Be landscaped to include seasonally shallowly inundated wetland margins (at least 10 m wide) on the outer edges of the pond which resembles a similar habitat to that of the wetland south of the site (i.e., the no-go area) (allowance must be made for the sourcing of locally indigenous wetland plants for these areas, which would be located outside of the hard-working functional parts of the detention pond, but would contribute towards improved biodiversity and additional shallow (<300 mm deep) seasonally inundated wetland habitat suitable for use by wading birds in the wet season. • Use palisade fencing (rather than walls). • Place fencing along the outside of the western boundary of the site. • Include access along the western boundary for maintenance purposes. • Allow access along fencing along the southern boundary of the site to allow for at least 5 m between the fence and the edge of the wetland south of the site (i.e., the no-go area). • Assess the quality of fill on the site for potential sources of uranium and other contaminants of concern in wetland surface water. • Conduct repeat wet season sampling of the wetland south of the site (i.e., the no-go area) for water quality assessments. • Use the results of the assessment of the quality of fill on the site and the wet season sampling of the wetland south of the site (i.e., the no-go area) to inform appropriate disposal during detailed site planning.		
Residual impacts:	Wetland loss	Wetland loss	N/A
Cumulative impact post mitigation:	*Medium (negative)*	*Medium (negative)*	N/A
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Medium-High (negative)*	*Medium-High (negative)*	N/A
Potential impact and risk:	Wetland degradation		
Nature of impact:	Negative	Negative	N/A
Extent and duration of impact:	Local, medium-term	Local, medium-term	N/A
Consequence of impact or risk:	Given their close proximity to the proposed construction activities, and without the application of mitigation measures, the wetlands surrounding the site (see Figure 4) would be negatively impacted by: • Changes in water quality (inflows of cement or otherwise contaminated water); • Physical damage during construction as a result of the passage of vehicles / construction machinery over these areas; and		N/A

Alternative:	Preferred alternative	Alternative 1	No-Go Alternative
	• The accumulation of construction material (e.g., cement bags and waste from construction workers [e.g., general litter and other waste]) These wetlands provide habitat for *inter alia* locally indigenous wetland plants including the delicate Cape-pondweed as well as to aquatic invertebrate communities (see item 2.2 of Section G), the natural of habitats of which are severely threatened.		
Probability of occurrence:	Highly probable	Highly probable	N/A
Degree to which the impact may cause irreplaceable loss of resources:	Significant loss	Significant loss	N/A
Degree to which the impact can be reversed:	Reversible with effort	Reversible with effort	N/A
Indirect impacts:	Possible knock-on impacts on the Big Lotus River as a result of uncontained runoff	Possible knock-on impacts on the Big Lotus River as a result of uncontained runoff	N/A
Cumulative impact prior to mitigation:	Negligible	Negligible	N/A
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*High (negative)*	*High (negative)*	No impact
Degree to which the impact can be avoided:	High	High	N/A
Degree to which the impact can be managed:	High	High	N/A
Degree to which the impact can be mitigated:	High	High	N/A
Proposed mitigation:	• Fence off the edge of the wetland south of the site (i.e., the no-go area) from the development using temporary fencing (preferably entrenched shade -cloth or wind-break netting) that prevents machine and human access to this area during construction and prevents the runoff of sediment-rich water from the site. • Fence off the western boundary of the site using temporary fencing. • Compile and implement a Construction Phase Environmental Management Programme which includes measures that will contain construction-associated sediment and runoff of contaminated maters (e.g., sediment, oils, fuel) within the site (i.e., preventing this material from entering the buffer around the wetland south of the site). • Limit construction activities so that it does not impede on the no go area south of the site and/or beyond the western boundary of the site.		N/A

Alternative:	Preferred alternative	Alternative 1	No-Go Alternative
	• Construct the detention pond and swales outside of the wet season (i.e., construction should take place between October and the end of May).		
Residual impacts:	None	None	N/A
Cumulative impact post mitigation:	*Low (negative)*	*Low (negative)*	N/A
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Low (negative)*	*Low (negative)*	N/A
OPERATIONAL PHASE			
IMPACTS ON GROUNDWATER			
Potential impact and risk:	Ongoing Infiltration of contaminated stormwater		
Nature of impact:	Negative	Negative	N/A
Extent and duration of impact:	Local, long-term	Local, long-term	N/A
Consequence of impact or risk:	• Contamination of the soil and/or groundwater could decrease water quality to dangerous levels for consumption and/or use, affecting other users and ecosystems in the area if the contamination mobilises; and • Impacts on downstream wetlands and associated biodiversity.		N/A
Probability of occurrence:	Probable	Probable	N/A
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss	Marginal loss	N/A
Degree to which the impact can be reversed:	Partly reversible	Partly reversible	N/A
Indirect impacts:	Deteriorated groundwater quality may result in other groundwater users being without suitable water quality. Contact with contaminated groundwater can cause disease and infections. Furthermore, the contaminated groundwater can impact wetland and vegetation health and pollute soils.	Deteriorated groundwater quality may result in other groundwater users being without suitable water quality. Contact with contaminated groundwater can cause disease and infections. Furthermore, the contaminated groundwater can impact wetland and vegetation health and pollute soils.	N/A
Cumulative impact prior to mitigation:	*Medium (negative)*	*Medium (negative)*	N/A

Alternative:	Preferred alternative	Alternative 1	No-Go Alternative
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Medium (negative)*	*Medium (negative)*	No impact
Degree to which the impact can be avoided:	High	High	N/A
Degree to which the impact can be managed:	High	High	N/A
Degree to which the impact can be mitigated:	High	High	N/A
Proposed mitigation:	• Treat contaminated water and transport it off-site. • Implement appropriate leak detection procedures, including frequent monitoring of resources. • Monitor shallow groundwater if any critical sites are identified during the Planning, Design and Construction Phase.		N/A
Residual impacts:	None	None	N/A
Cumulative impact post mitigation:	*Low (negative)*	*Low (negative)*	N/A
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Low (negative)*	*Low (negative)*	N/A
Potential impact and risk:	Contamination due to sewage leaks		
Nature of impact:	Negative	Negative	N/A
Extent and duration of impact:	Local, long-term	Local, long-term	N/A
Consequence of impact or risk:	• Contamination of the soil and/or groundwater could decrease water quality to dangerous levels for consumption and/or use, affecting other users and ecosystems in the area if the contamination mobilises; and • Impacts on downstream wetlands and associated biodiversity.		N/A
Probability of occurrence:	Probable	Probable	N/A
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss	Marginal loss	N/A

Alternative:	Preferred alternative	Alternative 1	No-Go Alternative
Degree to which the impact can be reversed:	Partly reversible	Partly reversible	N/A
Indirect impacts:	Deteriorated groundwater quality may result in other groundwater users being without suitable water quality. Contact with contaminated groundwater can cause disease and infections. Furthermore, the contaminated groundwater can impact wetland and vegetation health and pollute soils.	Deteriorated groundwater quality may result in other groundwater users being without suitable water quality. Contact with contaminated groundwater can cause disease and infections. Furthermore, the contaminated groundwater can impact wetland and vegetation health and pollute soils.	N/A
Cumulative impact prior to mitigation:	*Medium (negative)*	*Medium (negative)*	N/A
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Medium (negative)*	*Medium (negative)*	No impact
Degree to which the impact can be avoided:	High	High	N/A
Degree to which the impact can be managed:	High	High	N/A
Degree to which the impact can be mitigated:	High	High	N/A
Proposed mitigation:	• Treat contaminated water and transport it off-site. • Implement appropriate leak detection procedures, including frequent monitoring of resources. • Monitor shallow groundwater if any critical sites are identified during the Planning, Design and Construction Phase.		N/A
Residual impacts:	None	None	N/A
Cumulative impact post mitigation:	*Low (negative)*	*Low (negative)*	N/A
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Low (negative)*	*Low (negative)*	N/A

Alternative:	Preferred alternative	Alternative 1	No-Go Alternative
IMPACTS ON AQUATIC BIODIVERSITY			
Potential impact and risk:	Ongoing wetland loss and degradation		
Nature of impact:	Negative	Negative	Negative
Extent and duration of impact:	Local, long-term	Local, long-term	Local, permanent
Consequence of impact or risk:	Until now, the wetlands surrounding the site (see Figure 4) have been buffered from impacts by the undeveloped portions of the site. These portions of the site have been impacted by issues such as illegal dumping. The project will bring these impacts closer to the wetlands surrounding the site, resulting in increased opportunities for dumping of solid waste into adjacent open space areas. If the project is to include backyard development, these impacts would be compounded by impacts on water quality runoff and solid waste accumulation resulting from the presence of the additional populations (up to four times the intended population) residing within the development footprint.		The no-go alternative would result in the site remaining derelict and subject to high levels of ongoing unlawful activities and dumping in the northern and eastern portions of the site. No rehabilitation of the wetlands within the boundaries of the site is expected as it is assumed that infilling and further pollution of these wetlands will continue over time. However, the seasonal wetlands south of the site (considered to be the most important seasonal wetlands considered by the specialist) are currently buffered from dumping and disturbance by the presence of the derelict site and is less likely to be directly impacted by dumping without formal site development and the anticipated increase in solid waste accumulation in open space areas on and near to the site resulting from inadequately serviced backyard settlements. Should all the mitigation measures be implemented, the preferred alternative would be preferred over the no-development alternative.
Probability of occurrence:	High	High	High
Degree to which the impact may cause irreplaceable loss of resources:	Significant loss	Significant loss	High
Degree to which the impact can be reversed:	Irreversible	Irreversible	Irreversible
Indirect impacts:	Possible knock-on impacts on the Big Lotus River as a result of uncontained runoff	Possible knock-on impacts on the Big Lotus River as a result of uncontained runoff	N/A
Cumulative impact prior to mitigation:	*Low (negative)*	*High (negative)*	No impact

Alternative:	Preferred alternative	Alternative 1	No-Go Alternative
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Medium-High (negative)*	*Medium-High (negative)*	*Medium (negative)*
Degree to which the impact can be avoided:	Medium	Medium	N/A
Degree to which the impact can be managed:	Medium	Medium	N/A
Degree to which the impact can be mitigated:	High	High	N/A
Proposed mitigation:	• Place the two-story units (rather than single-storey or veteran units) along the entire western and southern edges of the site (as shown in Figure 1). • Design servicing (sewage, solid waste collection and stormwater management) to an appropriate size so as to accommodate backyard settlements at single-storey and veteran units. This design must be approved by the relevant sewage reticulation, wastewater treatment works and urban waste departments of the City of Cape Town prior to any development authorisation. • Remove solid waste from the open space west of the site and along the southern buffer area weekly. • Maintain and stormwater system on an ongoing basis. • Audit the stormwater management plan on an ongoing basis. • Edge all road edges along the southern and western boundaries of the site with bollards spaced at sufficient distances apart to limit access for dumping from vehicles.		N/A
Residual impacts:	None	None	N/A
Cumulative impact post mitigation:	*Low (negative)*	*Medium (negative)*	N/A
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Low-Medium negative*[36]	*Low-Medium negative*	N/A
Potential impact and risk:	Incremental degradation of the Big Lotus River		
Nature of impact:	Negative	Negative	N/A
Extent and duration of impact:	Local, long-term	Local, long-term	N/A

[36] The significance rating after mitigation is applied will be reduced to *Low* if a service level agreement is entered into between a service provider (e.g., the City of Cape Town) guaranteeing that the level of service delivery will be in line with the actual population of the project and service demand (Liz Day Consulting, 2025).

Alternative:	Preferred alternative	Alternative 1	No-Go Alternative
Consequence of impact or risk:	The water quality of the Big Lotus River is critically degraded and is the main source of impacts on the water quality of Zeekoevlei, which is also in a critical condition. Inflows to Zeekoevlei from the Big Lotus River is the most significant threat to its sustainability. The project will increase the (already high) levels of solid waste dumping into the river. Furthermore, if the project includes high levels of backyard settlement, this would potentially increase pollution sources of the river system (dumping of night soils and/or domestic wastewater into the river and/or stormwater system). Increased unmanaged solid waste in the development would further increase the likelihood of sewage blocks and overflows into the stormwater system, exacerbating current levels of pollution in the system.		N/A
Probability of occurrence:	High	High	N/A
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss	Marginal loss	N/A
Degree to which the impact can be reversed:	Reversible with major costs (remediation in downstream Zeekoevlei system)	Reversible with major costs (remediation in downstream Zeekoevlei system)	N/A
Indirect impacts:	Contribution to nutrient enrichment and accumulation of solid waste in Zeekoevlei, adding to management burden and increasing frequency of dredging and other interventions.	Contribution to nutrient enrichment and accumulation of solid waste in Zeekoevlei, adding to management burden and increasing frequency of dredging and other interventions.	N/A
Cumulative impact prior to mitigation:	*High (negative)*	*High (negative)*	N/A
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Medium (negative)*	*Medium (negative)*	No impact
Degree to which the impact can be avoided:	Low	Low	N/A
Degree to which the impact can be managed:	Medium	Medium	N/A
Degree to which the impact can be mitigated:	Medium	Medium	N/A
Proposed mitigation:	• Construct and maintain a solid waste interceptor fence in the Big Lotus River immediately downstream of the site or in a nearby suitable location, in consultation with the Friends of the Zeekoevlei and Rondevlei and the CoCT. • Clear litter fences at least twice per week • In consultation with the City of Cape Town, remove cleared solid waste weekly by Urban Waste Management.		N/A

Alternative:	Preferred alternative	Alternative 1	No-Go Alternative
Residual impacts:	Potentially increased levels of solid waste dumping into the Big Lotus River	Potentially increased levels of solid waste dumping into the Big Lotus River	
Cumulative impact post mitigation:	*Medium (negative)*	*Medium (negative)*	N/A
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	*Low (negative)*	*Low (negative)*	N/A

Decommissioning Phase

The Applicant does not intend to decommission the proposed development as it would provide permanent housing solutions to its residents.

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

1.	Provide a summary of the findings and impact management measures identified by all Specialists and an indication of how these findings and recommendations have influenced the proposed development.

Key Findings of the Groundwater Specialist Study

Although the aquifer below the site is highly vulnerable to point-source contamination, the project is assessed to have low impact on groundwater resources. Nonetheless, the mitigation measures specified by the specialist must be implemented. It must be noted that no site development plan was available at the time that the groundwater study was undertaken. Therefore, the specialist recommends that a hydrologist reviews the final site development plan. The following recommendations are also stated:

- The extent of the existing waste on the site must be investigated. If the waste is superficial, then the waste can be cleared and development can proceed. However, if the waste layer proves to be extensive, then a soil study should be conducted to assess whether the soil is contaminated and whether this will cause adverse health impacts on land users. A soil study should also be conducted if any hazardous waste is found during excavation; and
- Stormwater management systems must be designed to ensure that clean runoff is directed off-site and does not flood the nearby low-lying or clay lined areas.

Key Findings of the Aquatic Biodiversity Specialist Study

Although the site is highly degraded, functional wetlands do exist on the site (albeit no longer seasonally inundated or inundated only as a result of probable excavation to fill). However, the seasonal wetlands outside the site (particularly the wetland area south of the site) are important from an aquatic ecosystem perspective. All these wetlands are Southwest Fynbos depression wetlands, which are endangered and poorly protect in terms of the National Biodiversity Assessment (NBA) and the National Wetland Map 5 (NWM5).

Although layout has been revised (from Alternative 1 to the preferred alternative), the wetlands located within the boundaries of the site will be lost and it highly likely that the wetlands surrounding the site will be degraded without the implementation of the mitigation measures specified in Section H. The significance of impacts on Aquatic Biodiversity is considered to be *Medium-High (negative)*. The significance ratings for operational phase impacts are based on the assumption that the project will include numerous single-storey units, allowing for backyard settlements to be established. Backyard settlements are not accounted for during the planning stage – in other words, the population of backyard dwellers [in addition to 'formal' dwellers] are not included in planning for solid waste and sewage management. As a result, solid waste generated by backyard settlements can potentially accumulate in sensitive wetland areas around the site.

Implementing the mitigation measures specified by the Aquatic Biodiversity specialist can reduce the significance of impacts to acceptable levels. The loss of wetlands within the site boundaries is unavoidable. However, the specialist recommends rehabilitating infilled wetlands outside of the building footprint, as well as measures such as adjusting the footprint of the swales and the detention pond to offset this impact.

The significance of Construction Phase impacts can be reduced to *Low (negative)* by implementing the mitigation measures specified by the specialist. However, Operational Phase impacts will require commitment from the CoCT to provide adequate servicing of solid waste and sewage (to allow for the increased population size assumed from the expected establishment of backyard settlements). Low confidence in the implementation of this results in a *Low-Medium (negative)* rating of the significance of the impact. This can be reduced to *Low* if a Service Level Agreement is put in place with the CoCT (or another appropriate service provider) to implement this measure.

The no-go alternative would result in the site remaining derelict and subject to high levels of ongoing unlawful activities and dumping in the northern and eastern portions of the site. No rehabilitation of the wetlands within the boundaries of the site is expected as it is assumed that infilling and further pollution of these wetlands will continue over time. However, the seasonal wetlands south of the site (considered to be the most important seasonal wetlands considered by the specialist) are currently buffered from dumping and disturbance by the presence of the derelict site and is less likely to be directly impacted by dumping without formal site development and the anticipated increase in solid waste accumulation in open space areas on and near to the site resulting from inadequately serviced backyard settlements. Should all the mitigation measures be implemented, the preferred alternative would be preferred over the no-development alternative.

Given the finding of elevated uranium in the wetland south of the site, additional water samples were collected and analysed from this wetland. The samples were analysed for concentrations of dissolved copper and uranium. Dissolved copper concentrations do not meet the threshold linked to negative impacts on aquatic ecosystems[37]. Dissolved uranium concentrations were, however, found to be above the thresholds of concern for aquatic ecosystems. Neither copper or uranium concentrations present in the analysed samples contained concentrations above the SANS 241-1:2015 (drinking water) thresholds, and therefore should not be of concern with respect to exposure of residents to these contaminants. It is recommended that uranium concentrations are monitored (Liz Day Consulting, 2025).

The project is considered acceptable from an aquatic biodiversity perspective if all the mitigation measures proposed by the specialist are implemented (Liz Day Consulting, 2025).

Key findings of the Terrestrial Biodiversity Specialist Study

The terrestrial biodiversity sensitivity of the site was verified to be *Low*. As such, a Terrestrial Biodiversity Compliance Statement was compiled for the site (see Appendix G). As the project will not result in the loss of SCC or indigenous vegetation, no specific mitigation measures were suggested by the specialist (NCC Environmental Services (Pty) Ltd, 2025).

[37] Based on the Department of Water Affairs (1996) guidelines for toxicity thresholds (Liz Day Consulting, 2025).

2.	List the impact management measures that were identified by all Specialist that will be included in the EMPr

Mitigation Measures Recommended by the Groundwater Specialist

Planning, Design and Development Phase:

- Allow for clean stormwater to be appropriately directed and allowed to infiltrate the primary aquifer.
- Maintain construction vehicles regularly and keep them in good working order.
- Do not leave heavy equipment or vehicles on sands or open soils when not in use.
- Park vehicles on hardstanding surfaces when not in use.
- Place drip trays underneath vehicles that are not in use.
- Capture and reuse dirty water where possible.
- Do not discharge dirty water into the surrounding environment.
- Monitor groundwater quality monthly throughout the construction phase.
- Ensure that any activities with potential impacts on groundwater are appropriately conducted and that any spillages/events are responded to timeously.

Operational Phase:

- Treat contaminated water and transport it off-site.
- Implement appropriate leak detection procedures, including frequent monitoring of resources.
- Monitor shallow groundwater if any critical sites are identified during the Planning, Design and Construction Phase.

Mitigation Measures Recommended by the Aquatic Biodiversity Specialist

Planning, Design and Development Phase:

- Place the two-story units (rather than single-storey or veteran units) along the entire western and southern edges of the site (as shown in Figure 1).
- Design servicing (sewage, solid waste collection and stormwater management) to an appropriate size so as to accommodate backyard settlements at single-storey units. This design must be approved by the relevant sewage reticulation, wastewater treatment works and urban waste departments of the City of Cape Town prior to any development authorisation.
- Maintain a 10 m gap between the southern boundary of the swale in the southern portion of the site and the edge of the seasonal wetland south of the site (i.e., the no-go area).
- Place the swales in the western portion of the site within ~5 m of the western boundary of the site[38].
- Plant the swales with locally indigenous, hardy vegetation compatible with their locations abutting important seasonally inundated and rehabilitated wetlands (west of the site) with input from a botanist and wetland ecologist, informed by a detailed engineering design that considers the depth of the water table in the affected areas when establishing the swale depth.
- Landscape the remaining area (by means of excavation of fill in of the infilled wetland) in the western portion of the site (excluding areas designated for the stormwater detention pond) to create seasonally inundated wetlands and a wetland area west of this that are:
  - Set at roughly the same level as those of the wetland south of the site (i.e., the no-go area).
  - Landscaped to create an area that resembles a mosaic of natural, shallowly inundated depressions (maximum 1:1 year wet season inundation of around 300 mm depth), interspersed by slightly higher lying mounds.
  - Planted with locally indigenous wetland vegetation, sourced from plant stock in the Zeekoe catchment, and dominated by *Juncus kraussii* plants, to achieve a density of 80% by area before site handover.
  - Reasonable compensation for the loss of wetland in the rest of the site.
- The proposed retention pond should:
  - Include an accessible forebay for removal of sediment and solid waste (although it is assumed that most of this material would be collected in the swale systems).
  - Be landscaped to include seasonally shallowly inundated wetland margins (at least 10 m wide) on the outer edges of the pond which resembles a similar habitat to that of the wetland south of the site (i.e., the no-go area) (allowance must be made for the sourcing of locally indigenous wetland plants for these areas, which would be located outside of the hard-working functional parts of the detention pond, but would contribute towards improved biodiversity and additional shallow (<300 mm deep) seasonally inundated wetland habitat suitable for use by wading birds in the wet season.
- Use palisade fencing (rather than walls).
- Place fencing along the outside of the western boundary of the site.
- Include access along the western boundary for maintenance purposes.
- Allow access along fencing along the southern boundary of the site to allow for at least 5 m between the fence and the edge of the wetland south of the site (i.e., the no-go area).
- Assess the quality of fill on the site for potential sources of uranium and other contaminants of concern in wetland surface water.
- Conduct repeat wet season sampling of the wetland south of the site (i.e., the no-go area) for water quality assessments.

[38] The swales will serve as a defined edge to the development and a protective buffer for the wetlands beyond it.

- Fence off the edge of the wetland south of the site (i.e., the no-go area) from the development using temporary fencing (preferably entrenched shade -cloth or wind-break netting) that prevents machine and human access to this area during construction and prevents the runoff of sediment-rich water from the site.
- Fence off the western boundary of the site using temporary fencing.
- Compile and implement a Construction Phase Environmental Management Programme which includes measures that will contain construction-associated sediment and runoff of contaminated maters (e.g., sediment, oils, fuel) within the site (i.e., preventing this material from entering the buffer around the wetland south of the site).
- Limit construction activities so that it does not impede on the no go area south of the site and/or beyond the western boundary of the site.
- Construct the detention pond and swales outside of the wet season (i.e., construction should take place between October and the end of May).
- Monitor dissolved uranium concentrations in the wetland south of the site during construction.

Operational Phase:

- Remove solid waste from the open space west of the site and along the southern buffer area weekly.
- Maintain and stormwater system on an ongoing basis.
- Audit the stormwater management plan on an ongoing basis.
- Edge all road edges along the southern and western boundaries of the site with bollards spaced at sufficient distances apart to limit access for dumping from vehicles.
- Construct and maintain a solid waste interceptor fence in the Big Lotus River immediately downstream of the site or in a nearby suitable location, in consultation with the Friends of the Zeekoevlei and Rondevlei and the CoCT.
- Clear litter fences at least twice per week.
- In consultation with the City of Cape Town, remove cleared solid waste weekly by Urban Waste Management.
- Monitor dissolved uranium concentration in the wetland south of the site throughout the operational phase.

Mitigation Measures Recommended by the Terrestrial Biodiversity Specialist

No specific mitigation measures are recommended by the Terrestrial Biodiversity specialist. However, the following generic measures to manage potential impacts on terrestrial biodiversity are included in the EMPr (NCC Environmental Services (Pty) Ltd, 2025):

- Keep the site clear of invasive alien plant species listed in terms of the National Environmental Management: Biodiversity Act 10 of 2004 (NEM:BA) as per The Guidelines for Species Listed as Invasive in terms of Section 70 of NEM:BA and as required by Section 76 of NEM:BA.
- Maintain standard safety, health, environment, risk and quality (SHERQ) site 'housekeeping' etiquette (i.e., do not allow waste runoff to be disposed into gutters / watercourses, remove all litter from the site, service register kept toilets regularly and keep them tied down at all times).

3.	List the specialist investigations and the impact management measures that will **not** be implemented and provide an explanation as to why these measures will not be implemented.

All specialist recommendations are already incorporated into the design, or will be accommodated in the detailed design, construction and operational phases.

4.	Explain how the proposed development will impact the surrounding communities.

The landscape character and sense of place of the surrounding community will undergo change due to development of a the formal community area on land that is currently used for unlawful activities. Temporary impacts such as increased noise and dust emissions are expected during the construction phase. Noise is expected to continue into the operational phase, albeit to a lesser degree. Furthermore, the increased population will result in additional traffic volumes in the area.

5.	Explain how the risk of climate change may influence the proposed activity or development and how has the potential impacts of climate change been considered and addressed.

The site is located in Cape Town, which has a history of drought. The most significant impacts of climate change are anticipated to relate to fluctuations in rainfall, water availability on site, and extreme weather events such as droughts and flash floods.

Managing these events is integral to the stormwater management plan.

6.	Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.

Three specialist studies were undertaken for the project – a groundwater impact assessment, aquatic biodiversity impact assessment and terrestrial biodiversity compliance statement. No recommendations were specified in the terrestrial biodiversity compliance statement; however several were specified in the groundwater and aquatic biodiversity impact assessments. The recommendations have been critically considered and do not conflict with each other.

7.	Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.

The findings of the specialist assessments are summarised in this BAR. The EMPr has considered the impacts identified during the impact assessment process and incorporates all mitigation measures recommended by the independent specialists. The EMPr will be a legally binding document that must be implemented by the Applicant.

8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.
The implementation of the impact mitigation hierarchy, which aims to avoid negative impacts and, where unavoidable, minimize and remedy these impacts while maximizing positive outcomes, plays a critical role in achieving sustainability. This approach ensures the maintenance of the interdependent sustainability requirements for both biophysical system integrity and human well-being. It also helps to avoid inappropriate trade-offs that could result in the loss of essential ecosystem functioning, thereby supporting the long-term sustainability of both natural and human systems (DEA, 2014).	

SECTION J: GENERAL

1. Environmental Impact Statement

1.1.	Provide a summary of the key findings of the EIA.

This study was informed by specialists to ensure a high level of confidence in findings. It was found that the site is largely transformed, with little to no biodiversity remaining. The most significant biophysical sensitivities are the wetlands within and around the site (see Figure 4). The Aquatic Biodiversity specialist provided sufficient recommendations to prevent / minimise impacts on these wetlands.

The study did not reveal any fatal flaws. All impacts can be limited to acceptable levels and all specialists involved supported the development, as proposed. All specialist recommendations are incorporated into the design or the EMPr.

1.2.	Provide a map that that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2)

See Appendix B2.

1.3.	Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.

Table 4 summarises the impacts.

Table 4: Summary of impacts

Impact	Preferred Alternative		Alternative 1		No-Go Alternative	
	Before Mitigation	After Mitigation	Before Mitigation	After Mitigation	Before Mitigation	After Mitigation
PLANNING, DESIGN AND DEVELOPMENT PHASE						
Reduction in available area for groundwater recharge	*Medium (negative)*	*Low (negative)*	*Medium (negative)*	*Low (negative)*	No impact	N/A
Groundwater contamination	*Medium (negative)*	*Low (negative)*	*Medium (negative)*	*Low (negative)*	No impact	N/A
Wetland loss	*Medium-High (negative)*	*Medium-High (negative)*	*Medium-High (negative)*	*Medium-High (negative)*	No impact	N/A
Wetland degradation	*High (negative)*	*Low (negative)*	*High (negative)*	*Low (negative)*	No impact	N/A
OPERATIONAL PHASE						
Ongoing infiltration of contaminated stormwater	*Medium (negative)*	*Low (negative)*	*Medium (negative)*	*Low (negative)*	No impact	N/A
Contamination due to sewage leaks	*Medium (negative)*	*Low (negative)*	*Medium (negative)*	*Low (negative)*	No impact	N/A
Ongoing wetland loss and degradation	*Medium-High (negative)*	*Low-Medium (negative)*	*High (negative)*	*Low-Medium (negative)*	*Medium (negative)*	N/A
Incremental degradation of the Big Lotus River	*Medium (negative)*	*Low (negative)*	*Medium (negative)*	*Low (negative)*	No impact	N/A

2. Recommendation of the Environmental Assessment Practitioner ("EAP")

2.1.	Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMPr

The EMPr considers the impacts identified during the impact assessment process and incorporates all mitigation measures recommended by the independent specialists, authorities, and the EAP. These mitigation measures, or environmental specifications, have been integrated into all phases of the development, except for the decommissioning phase, as this is not intended by the Applicant. This approach ensures the implementation of integrated environmental management and the appropriate consideration of environmental concerns throughout all stages and levels of the project.

The EMPr will be a legally binding document that must be implemented by the Applicant. Additionally, the EMPr includes a further layer of oversight through the involvement of an independent auditor, who will conduct regular audits during the construction phase. Auditing will also be required during the operational phase of the project.

The impact management objectives and outcomes for the design and construction, as well as the operational phase and are included in the EMPr (see Appendix H).

2.2.	Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.

- The EMPr and associated appendices (see Appendix H) must be implemented, and the requirements therein considered and observed as conditions of authorisation;
- Mitigation measures noted from this BAR are included in the EMPr (see Appendix H), as detailed in this BAR;
- The EMPr should be incorporated into all tender and contract documentation;
- An ECO must be employed throughout the duration of the construction phase of the activity and the Applicant should also ensure that operational phase recommendations are strictly adhered to; and
- Any future development would need to be considered against the requirements of the applicable law at the time.

2.3.	Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.

This BA process revealed that the project presents the sustainable development of a transformed site within the urban edge. It was shown that the project is associated with justifiable negative impacts at tolerable levels. No fatal flaws were identified. All the specialists that were involved in the study supports the development, with implementation of the recommended mitigation measures.

While comments on the pre-application BAR (this report) has not yet been received, there is no evidence that suggests that the development is inappropriate. In the opinion of the EAP, the development constitutes responsible development and the 'Best Practicable Environmental Option' on site.

The EAP recommends approval of the proposal, subject to the conditions noted in 2.2 above.

2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.

The assumptions and limitations associated with the specialist studies are noted in the respective specialist reports (see Appendix G), and in the interest of brevity, will not be repeated here.

The BA process and this BAR are based on the following assumptions:

- All information received from sources contributing to this project is accurate and unbiased;
- All organs of state and IAPs with the intent to comment on the documentation will do so within the prescribed timeframes[39];
- That the applicant will implement the recommendations resulting from this study; and

There are no known gaps in knowledge or uncertainties.

2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.

A validity period of five years for commencement of the listed activity will be sufficient. Note that the construction of the project will occur in three phases. Therefore, the EA will need to make provision for this.

It is recommended that the date that the activity would be concluded be ten years from the date of commencement of the listed activity.

Post-construction monitoring and implementation of the operational EMPr (through the Applicant) will be required for each phase and unit developed. Specific details in this regard are included in the EMPr.

3. Water

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.

It is recommended that non-potable water is used during the construction phase activities (i.e dust suppression, concrete mixing, cleaning of construction equipment etc.) and for landscaping during the operational phase of the project.

Further water-saving measures such as water-saving taps and shower heads are recommended to be installed in the residential units.

[39] If any IAP (including authorities) fail to comment on the documentation within the prescribed timeframes, it is assumed that they do not have any comment, as stipulated in the EIA Regulations, 2014, as amended.

4. Waste

Explain what measures have been taken to reduce, reuse or recycle waste.
Construction waste will include general waste (e.g., plastic packaging, strapping, lunch wrappers.), rubble (e.g., broken asphalt, waste concrete), limited quantities of hazardous waste items (e.g., paint tins, oil cans etc.) and waste oil resulting from the servicing or repair of vehicles and plant on site. Construction contractors will remove the waste to registered landfill sites or approved recycling facilities. Given that the EMPr requires the use of portable toilets, no wastewater would be discharged into the existing sewer system during construction. Measures for the reduction, reuse and recycling of waste would apply only to the construction phase. Some measures have been included in the EMPr (Appendix H) including the following: • Make use of locally supplied building materials where possible. • Use reclaimed building materials where possible. • Re-use materials used or generated by construction, or the construction areas of other City of Cape Town projects nearby in accordance with the integrated waste management approach (to be followed through the construction phases of the project. • Do not import materials containing invasive plant seeds, litter or contaminants. • Inform suppliers (who will have the authority to reject imported material if deemed necessary) about the sites of origin of imported gravel, sand, stone, etc. • Use durable building materials to increase the lifespan of the developments. • Use low Volatile Organic Compound (VOC) paints and building materials where possible. • Provide adequate storage facilities for raw materials to minimise damage during construction works. • Use suppliers with a green footprint or certification where possible. • Use sustainable building materials where possible. No specific measures would be implemented during the operational phase as there would be no operational waste produced.

5. Energy Efficiency

8.1.	Explain what design measures have been taken to ensure that the development proposal will be energy efficient.
It is recommended that the design of the residential units considers principles of sustainability, including efficient use of water and electricity, in order to promote energy and resource conservation. Measures addressing these considerations have been integrated into the design and planning specification outlined in the EMPr.	

REFERENCES

Amphibian Fact. (2025). Western Leopard Toad. Retrieved from https://www.amphibianfact.com/western-leopard-toad.asp

BirdLife South Africa. (2025). Retrieved from Regional Red Data Book 2025.

City of Cape Town. (2015). Municipal Planning By-Law.

City of Cape Town. (2022). City of Cape Town Integrated Development Plan July 2022 - June 2027.

City of Cape Town. (2022). Southern integrated district spatial development framework and environmental management framework. Retrieved from https://resource.capetown.gov.za/documentcentre/Documents/City%20research%20reports%20and%20review/Southern_DSDF_EMF_Vol_2_2022.pdf

City of Cape Town. (2023). Municipal Spatial Development Framework.

City of Cape Town. (2024). Cape Town Indigenous Fauna Western Leopard Toad (Sclerophrys pantherina). Retrieved from https://resource.capetown.gov.za/documentcentre/Documents/Graphics%20and%20educational%20material/Western_Leopard_Toad_Fact_Sheet.pdf

City of Cape Town. (2025). Cape Town Biodiversity Spatial Plan 2025. Retrieved from https://www.gtaf.org.za/wp-content/uploads/2025/03/CT_Biodiversity_Spatial_Plan_2025.pdf

City of Cape Town. (n.d.). The Endangered Western Leopard Toad. Retrieved from https://resource.capetown.gov.za/documentcentre/Documents/Graphics%20and%20educational%20material/Western_Leopard_Toad_leaflet_2015-02.pdf

DEA. (2014). Environmental Impact Assessment and Management Strategy for South Africa. Retrieved from https://www.dffe.gov.za/sites/default/files/docs/strategy.framework/eiams_environmentalimpact_managementstrategy.pdf

DEA. (2017). Guideline on Need and Desirability. Pretoria, South Africa: Department of Environmental Affairs (DEA). Retrieved from https://www.dffe.gov.za/sites/default/files/Pdf-Files/guidelines-and-policies/needanddesirabilityguideline2017_0.pdf

Department of Cooperative Governance. (2016). Integrated Urban Development Framework.

Department of Environmental Affairs. (2012). Companion to the Environmental Impact Assessment Regulations, 2010. Retrieved from https://cer.org.za/wp-content/uploads/2014/04/20121010-National-Gazette-No-35769-of-10-October-2012-Volume-568-1.pdf

Department of Environmental Affairs. (2017). Guideline on Need and Desirability, Department of Environmental Affairs (DEA). Pretoria, South Africa. Retrieved from https://www.dffe.gov.za/sites/default/files/Pdf-Files/guidelines-and-policies/needanddesirabilityguideline2017_0.pdf

Department of Environmental Affairs. (2017). Public Participation Guideline in terms of National Environmental Management Act, 1998 Environmental Impact Assessment Regulations.

Department of Environmental Affairs and Tourism. (1996). Green Paper on Environmental Policy for South Africa. Retrieved from https://www.gov.za/sites/default/files/gcis_document/201409/environmentalpolicy.pdf

Department of Human Settlements. (2004). A Comprehensive Plan for the Development of Integrated Sustainable Human Settlements.

Department of Human Settlements. (2025). Department of Human Settlements Strategic Plan 2025/30. Retrieved from https://www.dhs.gov.za/sites/default/files/documents/DHS%20FINAL%202025-30%20%20STRATEGIC%20PLAN%2031%20MARCH%202025.pdf

Department of Water Affairs and Forestry. (1996). South African Water Quality Guidelines. Volume 7: Aquatic Ecosystems. Pretoria.

Department of Water and Sanitation. (2005). Groundwater Resource Assessment Phase 2.

First Home Finance. (2023). laying Strong Foundations for Tomorrow's Success. Retrieved from https://www.nhfc.co.za/finance-solutions/first-home-finance/

Fynbos Forum. (2019). Ecosystem Guidelines for Environmental Assessement in the Western Cape.

GEOSS. (2024). Groundwater Impact Assessment for a Proposed Housing Develoment on Erf 6482, Grassy Park, Cape Town.

GOOD. (2025, June 18). Western Cape Housing Qeue: Waiting for a Grave, Not a Home. Retrieved from https://forgood.org.za/western-cape-housing-queue-waiting-for-a-grave-not-a-home/#:~:text=In%202024%2F25%2C%20the%20province%20completed%20only%203%2C046%20Breaking,157%20years%20to%20clear%20the%20current%20housing%20need.

IUCN. (2025). The IUCN Red List of Threatened Species. Retrieved September 9, 2025, from https://www.iucnredlist.org/

Keatimilwe, K., & Ashton, P. (2005). Guideline for hte review of the specialist input in EIA processes: Edition 1. Provincial Government of the Western Cape Department of Environmental Affairs & Develoment Planning, Cape Town. Retrieved from https://www.collegesidekick.com/study-docs/5618283

Liz Day Consulting. (2025). Proposed Housing Develompent on Erf 6482, Grassy Park, Cape Town. Specialist Aquatic Ecology Impact Assessment Report.

Lötter, M. C. (2021). Fine-scale delineation of Strategic Water Source Areas for surface water in South Africa usnig Empirical Bayesian Kriging Regression Prediction: Technical Report. Pretoria: South African National Biodiversity Institute (SANBI).

National Planning Commission. (2011, November 11). National Development Plan. Vision for 2030. Retrieved from https://www.gov.za/sites/default/files/gcis_document/201409/devplan2.pdf

NCC Environmental Services (Pty) Ltd. (2025). Terrestrial Biodiversity Compliance Statement. Erf 6482, Lotus River Housing Development, Western Cape. Unpublished report.

SDI&GIS. (2013). City of Cape Town - 2011 Census Suburb Lotus River.

Snow Leopard Trust. (2017). Statement on IUCN Red List Status Change of the Snow Leopard. Retrieved from https://snowleopard.org/statement-iucn-red-list-status-change-snow-leopard/

South African Government. (2025). Vote 10: Department of Infrastructure.

South African National Biodiversity Institute (SANBI). (2020). Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. Pretoria: South African National Biodiversity Institute. Retrieved from https://www.birdlife.org.za/wp-content/uploads/2024/06/Species-Environmental-Assessment-guidelines_2022_V3_1.pdf#:~:text=Guidelines%20for%20the%20implementation%20of%20the%20Terrestrial%20Fauna,African%20National%20Biodiversity%20Institute%20and%20BirdLif

StatsSA. (2023). Income & Expenditure Survey 2022/23.

Steyn, D., & Hirsch, M. (2025, July 8). Explainer: affordable housing in Cape Town. Retrieved from https://www.bizcommunity.com/article/explainer-affordable-housing-in-cape-town-478459a

United Nations General Assembly. (1987). Report of the world commission on environment and development: Our commpn future. Oslo, Norway: United Nationas General Assembly, Development and International Co-operation: Environment.

Western Cape Department of Infrastructure. (2024, October 17). Cabinet endorses draft Western Cape Infrastructure Framework 2050. Retrieved from https://www.westerncape.gov.za/infrastructure/article/cabinet-endorses-draft-western-cape-infrastructure-framework-2050?utm_source=chatgpt.com

Western Cape Government. (2014). Western Cape Provincial Spatial Development Framework. Retrieved from https://cer.org.za/wp-content/uploads/2015/07/Western-Cape-Provincial-SDF-2014.pdf

Western Cape Government. (2019, November 25). Greater Retreat human settlements project to deliver 5000 housing opportunities. Retrieved from https://d7.westerncape.gov.za/news/greater-retreat-human-settlements-project-deliver-5000-housing-opportunities

Western Cape Government; CapeNature. (2023). Western Cape Biodiversity Spatial Plan. Retrieved from https://www.capenature.co.za/uploads/files/2023-WC-Biodiversity-Spatial-Plan-Low-resolution.pdf