



## FINAL PUBLIC PARTICIPATION PROCESS REPORT

In terms of the National Environmental Management Act (NEMA Act No 107 of 1998, as amended) and Environmental Impact Regulations, 2014 (as amended)

## AMENDMENT OF ENVIRONMENTAL AUTHORISATION (EA): FOR ERF 19741, DANA BAY

<b>Compiled by</b>	HillLand Environmental
<b>HillLand reference</b>	MOS24/1281/11
<b>Date</b>	28 November 2024

MOS24/1281/11  
28 November 2024

**ISSUED BY:**

HillLand Environmental  
P.O. Box 590  
George, 6530

Tel: 044 889 0229  
Fax: 086 542 5248  
E-mail: admin@hilland.co.za / cathy@hilland.co.za / environmental2@hilland.co.za  
Web site: www.hilland.co.za

**PROPOSED AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (EA) OF ERF 19741, DANA BAY**

**Submitted for:**

**DEADP DECISION MAKING PURPOSES, WITH SUBMISSION OF FINAL EIR**

**Conditions of report use**

The report is the property of the sponsor and the author, who may publish it, in whole, provided that:

1. That written approval is obtained from the author and that **HillLand Environmental** is acknowledged in the publication;
2. That **HillLand Environmental** is indemnified against any claim for damages that may result from publication;
3. The contents of this report may not be used for purposes of sale or publicity or advertisement without the prior written approval of **HillLand Environmental**.
4. **HillLand Environmental** accepts no responsibility for failure to follow the recommended programme.
5. **HillLand Environmental** accepts no responsibility for deviation or non-compliance of any specifications or guidelines provided in the report.
6. All figures, plates and diagrams are copyrighted and may not be reproduced by any means, in any form, in part or whole.

## Table of Contents

**INTRODUCTION** .....4

**REQUIREMENT OF THE PUBLIC PARTICIPATION PROCESS** .....4

**ROLES OF THE INTERESTED AND AFFECTED PARTY (I&APS)** .....5

**LIST OF INTERESTED AND AFFECTED PARTIES (I&APs)** .....6

**PUBLIC PARTICIPATION PROCESS**.....7

**COMMENTS ON EIR** .....9

**AUTHORITY COMMENT AND RESPONSES**.....9

**CONCLUSION**.....59

<b>Annexure A</b>	Proof of notifications
<b>Annexure B</b>	Legal advert
<b>Annexure C</b>	Site notice
<b>Annexure D</b>	List of registered I&APs
<b>Annexure E</b>	Comments and registrations received

## INTRODUCTION

**HillLand Environmental**, independent Environmental Assessment Practitioners (EAPs), have been appointed by the applicant, **Dana Devco (Pty) Ltd**, to ensure compliance with the National Environmental Management Act (NEMA, No 107 of 1998, as amended) and the Environmental Impact Assessment Regulations, 2014 (as amended) for the proposed amendment of the Environmental Authorisation (EA) that is in place for Erf 19741, Dana Bay, Mossel Bay.

This report serves as a record of the public participation process that incorporates all the public participation undertaken in terms of the NEMA for the amendment of the EA.

## REQUIREMENT OF THE PUBLIC PARTICIPATION PROCESS

Section 41 of NEMA specifies that a person conducting a public participation process must comply with the following minimum requirements as stipulated in the Regulations:

- (a) fixing a notice board (of a size at least 60cm by 42cm; and must display the required information in lettering and in a format as may be determined by the competent authority) at a place conspicuous to the public at the **boundary or on the fence** of:
  - (i) **the site where the activity to which the application relates is or is to be undertaken**; **One (1) site notice was placed at the entrances to the erf (11 September 2024).**
  - (ii) *any alternative site mentioned in the application*; **(Annexure C – please note that there are no site alternatives for this application).**
- (b) giving written notice, in any of the manners provided for in section 47D of the Act, to:
  - (i) the owner or person in control of that land if the applicant is not the owner or person in control of the land; the occupiers of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken - **(notified 6 September 2024)**
  - (ii) owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken **Neighbouring landowners - were notified on 6 September 2024 via email.**

**All registered I&AP's (including previously registered) were notified on 6 September 2024 of the availability of the EIR and associated appendices.**

**See Annexure A.**

  - (iii) the municipal councilor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area - **The ward councilor was notified on 6 September 2024. See Annexure A.**

- (iv) the municipality which has jurisdiction in the area – **Mossel Bay Municipality were notified on 6 September 2024- Annexure A**
- (v) any organ of state having jurisdiction in respect of any aspect of the activity; - **All persons listed in the register of Interested and Affected Parties, State Departments and Organs of State were notified, 6 September 2024.**
- (vi) any other party as required by the competent authority;
- (c) placing an advertisement in (i) **one local newspaper**; or (ii) any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;  
**An advert was placed in the Mossel Bay Advertiser on 13 September 2024.**
- (d) using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to (i) illiteracy; (ii) disability; or (iii) any other disadvantage – **the competent authority has not requested any specific reasonable alternative methods of public participation.**

**Proof of website:** <https://hilland.co.za/public-processes/erf-19741/>

**Environmental Impact Assessment – Erf 19741, Dana Bay**

**HillLand Environmental**, independent Environmental Assessment Practitioners (EAPs), have been appointed by the new developer/Holder, **Dana Devco (Pty) Ltd**, to ensure compliance with the National Environmental Management Act (NEMA, No 107 of 1998, as amended) and the Environmental Impact Assessment Regulations, 2014 (as amended) for the proposed amendment of the Environmental Authorisation (EA) that is in place for Erf 19741, Dana Bay, Mossel Bay.

Erf 19741 (here after referred to as 'the property') forms part of the well-known Paradise Coast development approval and is located north of Flora Road. Formal commencement of Paradise Coast has taken place south of Flora Road.

In terms of the EA, the approved description on the property allows for the development of 270 single residential erven, 1 business zone erf, associated infrastructure, addition of conservation areas (Open Space III) and private open space (Open Space II).

This proposal entails the **amendment of the Holder's details** (a new development company will become the holder of this northern section of Paradise Coast which will be split off from the southern part of Paradise Coast) and the densification of the approved SDP for the area north of Flora Road as referred to in the EA. The property is in the process of being sold by the original developer to a new development company who would like to **densify** the development which will be more suited to the current economic landscape and spatial planning principles.

Housing typologies (high end and high quality) proposed will consist of the following:

Phase 1 & 2:

- 288 Flats/apartments
- 88 Single residential erven
- 385 Townhouse erven
- Associated infrastructure
- Private open space with recreation and
- Conservation areas with hiking / walking pathways focused on continuing the conservation management of the flora and maintaining the linking open space areas.

## ROLES OF THE INTERESTED AND AFFECTED PARTY (I&APS)

In terms of Sections 42, 43 & 44 of NEMA EIA Regulations, a registered interested & affected party (I&AP) is entitled to comment, in writing, on all written submissions, including draft reports made to the competent authority by the applicant or the Environmental Assessment Practitioner (EAP) managing an application, and to bring to the attention of the competent authority any issues

which that party believes may be of significance to the consideration of the application, provided that **(All comments on the reports are included and attached to this final PPP report)**–

- (a) comments are submitted within (i) the timeframes that have been approved or set by the competent authority; (ii) any extensions of a timeframe agreed to by the Applicant or EAP.
- (b) A copy of comments submitted directly to the competent authority is served on the Applicant or EAP; and
- (c) The I&AP discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application, via an advert in the local press.

Sections 43 & 44 of NEMA further specify that all written comments received by the EAP from a registered I&AP must accompany the (public participation) report when the report is submitted to the competent authority with the final EIR.

The EIR was available for a 30-day commenting period **(13 September – 14 October 2024)**

All comments received have been included and responded to in this report that accompanies the final EIR.

### LIST OF INTERESTED AND AFFECTED PARTIES (I&APs)

The direct neighbours have been notified of the EIR for the amendment and associated commenting period. Besides the authorities and organs of state, **only Registered I&APs** receive further notifications with regards to this amendment process. **Registrations received have been included in the register of I&APs, Annexure D.**

The following stakeholders are registered:

Department of Environmental Affairs and Development Planning (DEADP)	State Department
Department of Forestry	State Department
CapeNature	Organ of State
Heritage Western Cape	Organ of state
Mossel Bay Municipality	Organ of State
Garden Route District Municipality	Regional Authority
Department of Water and Sanitation: BOCMA	State Department
Mossel Bay Municipality: Ward Councillor	Ward 11
Civil Aviation Association	Organ of State
SANRAL	Organ of State
Department of Transport and Public Works	State Department
Department of Agriculture	State Department

The following previously registered I&AP's were notified of this amendment process:

Pinnacle Point HOA	Previously registered I&AP
--------------------	----------------------------

Dana Bay Conservancy

Previously registered I&amp;AP

## PUBLIC PARTICIPATION PROCESS

In terms of Section 41 of the NEMA regulations, the following minimum requirement has been attended to under the Public Participation Process:

- Section 41 (5b)– giving written notice

Owners / occupiers of land adjacent to the proposal were informed on the **6 September 2024** (via email) of the need to registration and comment on the reports via notification letters (Please see **Annexure A**).

Authorities and are automatically entered as Registered I&APs (unless they indicate otherwise).

A legal advert was placed in a local newspaper (Mossel Bay Advertiser), inviting interested persons to register as I&APs on **13 September 2024**. Please see **Annexure B** for the legal advert.

One (1) site notice has been placed up at the erf, inviting interested persons to register in their personal capacity as I&APs since **11 September 2024**. Please see **Annexure C** for the site notice.

Only registered Interested and Affected Parties and NGOs will be notified further in the process – **all previously registered I&AP's remain registered as I&AP's and will be notified.**

**A public meeting was arranged by the Dana Bay Ratepayers. HillLand Environmental, the developer and planner attended the meeting on 8 October 2024 and provided presentations explaining the process, finding and details of the proposed development and answered questions and concerns raised by the residents.**



# ERF 19741 ONTWIKKELING/ DEVELOPMENT

Alle Danabaai inwoners  
- Woon asb bespreking by  
All Danabaai residents  
- Please attend meeting

● **18.30 DI/TUE 08/10**  
☎ **082 560 1978**

**DANABAAI  
GEMEENSAPSAL**



Public meeting invitation

It was clear at the public meeting that there had been misinformation spread on social media regarding the proposal as there was a strong misconception that the project was for low-cost housing which it is not.



## COMMENTS ON EIR

### AUTHORITY COMMENT AND RESPONSES

COMMENT	RESPONSE
<b>BOCME, R Makahane 26 September 2024</b>	
<p>1. The aquatic compliance statement indicates that the proposed development will have negative impacts on wetlands in the area. The applicant must provide the Risk Matrix assessment which will determine the Risk Class and proposed mitigation measures. This Risk Matrix must be completed by a suitably qualified SACNASP professional member.</p>	<p>The aquatic report includes a Risk Assessment, and a GA application will be required prior to working around the wetland area. A GA will be submitted prior to construction commencing in that area.</p>
<p>2. Please advise if the sewage and stormwater network will pose risk to the wetlands within the development area during construction phase and operational phase of the project.</p>	<p>There is no risk of the sewage or stormwater on the wetland during construction or operational phases – see the EMPr which covers the requirements for silt fencing during construction.</p>
<p>3. Please ensure that no water is taken from a water resource for any purpose without authorisation from the Responsible Authority.</p>	<p>No water is to be taken from the resource.</p>
<p>4. Please ensure that no waste or water containing waste is disposed in a manner which may detrimentally impact on a water resource without authorisation from the National Water Act, 1998 (Act 36 of 1998) and other related legislations.</p>	<p>No waste water will be disposed in any manner to detrimentally impact on any water resources.</p>
<p>5. No pollution of surface water or groundwater resources may occur due to any activity. Stormwater management must be</p>	<p>No pollution of groundwater resources will take place. Stormwater management is planned for the site. The SWMP makes use of SUDS and a detention pond.</p>

<p>addressed both in terms of flooding, erosion, and pollution potential.</p>	
<p><b>DEADP, Dorien Werth, 16 October 2024</b></p>	
<p>2. This Directorate has reviewed the document and comment as follows: 2.1 This Directorate requires a detailed map, indicating precisely how the proposed development footprint overlays the approved site development plan to ensure that the new site development plan will be within the same approved development footprint.</p>	<p>Figure 8 included in the EIR provided the overlay. The red line is the approved development zone overlaid on the proposed SDP. As extracted from the report:</p>



Figure 1: Approved development zone (red line) overlaid on the proposed SDP

The approved development zone overlaid on the zoning plan (plan proposed for approval):



2.2  
It is noted from the information provided that there is a small wetland along the southern boundary, please obtain comments from the Breede-Olifants Catchment Management Agency ("BOCMA").

BOCMA comments were obtained and included above. Based on their comments the aquatic specialist completed the Risk Assessment and confirmed the risk to be Low and that a GA will be required prior to construction commencing in the regulated area. A GA application is in process.

2.3  
Please obtain comments from Cape Nature on the proposed amendments and these comments must be included in the Final Environmental Impact Report.

CapeNature was requested to comment, and final reminder sent 17 October 2024. **No comments received to date.**

2.4  
Services  
This Directorate does take note the existing water reticulation system has insufficient capacity to accommodate the proposed

There is a misunderstanding of the services report and municipal letter and requirement for a pressure tower.

<p>development. Furthermore, the existing tower storage volume available in the Dana Bay Tower is only 3 hours of the AADD served and therefor insufficient to accommodate the proposed development. In addition, Mossel Bay municipality also confirmed that the existing tower storage volume available in Dana Bay Tower is insufficient to accommodate the proposed development. There is also clarification needed if there will be enough water supply for current approved development footprint.</p> <p>In light of the above, you are advised that the uncertainty in respect of the water supply requirements will likely prejudice the outcome of your application for environmental authorisation.</p>	<p>The municipality have confirmed that <b>there is sufficient water</b> but that they need to increase the pressure in the system. An additional tower in the reservoir property is required.</p> <p>The August letter from the municipality was included in the draft EIR and confirms the availability of water for the project and the requirement for an additional pressure tower.</p> <p>There is no listed activity associated with the new pressure tower as clearly indicated in the EIR report (see pages 13-15)</p>
<p>2.5. Please ensure that the Environmental Management Plan submitted with the Final Environmental Impact Assessment report did include all the mitigation measures which were recommended by the relevant specialists.</p>	<p>All recommendations have been incorporated into the EMPr.</p>
<p><b>SACAA, 21 October 2024</b></p>	
<p>Please see our comments below: The proposed site for the residential development is located near Mossel Bay Aerodrome which requires formal obstacle assessment for approval. This assessment will evaluate whether development will affect the safety of flights. Kindly lodge an application with Air Traffic and Navigation Services (ATNS) as published on the SACAA website: <a href="http://www.caa.co.za/industryinformation/obstacles/">www.caa.co.za/industryinformation/obstacles/</a>. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: <a href="http://www.caa.co.za">www.caa.co.za</a>.</p>	<p>The proposal is for densification in an existing approved housing node not exceeding 8m in height within an approved residential development node. This is no different to any housing within Mossel Bay, Dana Bay and surrounds and is no different to the current approved development area or height restrictions. There are no aerial obstacles associated with the houses and the water pressure tower required is adjacent to the existing municipal pressure tower within the utility node. Request made to confirm if an obstacle assessment is still required or not.</p>
<p>27 November 2024:</p>	

The amendment is noted, and there will be no impact on flight safety. However, should there be any other significant changes to the location and height of the proposed project, kindly make use of the approved obstacle assessors which can be found on the SACAA website: <a href="http://www.caa.co.za/industryinformation/obstacles/">www.caa.co.za/industryinformation/obstacles/</a> . The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: <a href="http://www.caa.co.za">www.caa.co.za</a> .	Noted and thanked.
<b>CapeNature</b> – no comment	
<b>SANRAL</b> – no comment	
<b>Garden Route Municipality</b> – no comment.	
<b>Mossel Bay Municipality</b> – no comment	
<b>Dept Transport and Public Works</b> – no comment	
<b>Dept Agriculture</b> – no comment	
<b>Dept Forestry (DFFE)</b> – no comment	
<b>Dept Health</b> – no comment	
<b>Ward Councillor – Nicky Le Roux – 1 October 2024</b> I'm sure you may be aware of the public meeting that was called by some residents.	Registered and forwarded the public meeting notice to us.
<b>Heritage Western Cape – 7 October 2024</b>	Confirmed no further studies required, previous ROD stands. Archaeological monitoring required for all earthworks and vegetation clearing as with the rest of Paradise Coast.

<b>R.G.V Beattie Dana Bay Ratepayers 25 September 2024</b>	
I hereby request you to register me as an affected and interested party, regarding the above mentioned matter.	<u>HillLand Environmental reply via email 26 September 2024:</u>  Registered as an I&AP
1.1) I was previously also registered as an affected party for a previous application under correction during period 2006/2008, where such an application, I believe, on the same property, was supposedly successfully stopped by representation from members of the Dana Bay residents and who lodged objections regarding the small size of and the unacceptable number of units that the developer proposed as well as other matters.	The project was not "stopped" and has been in operation since commencement and the 2006/2008 EA remains valid and in force and the southern section of Paradise Coast is already operational.

	There was no appeal against the EA by Dana Bay in 2006/2008 – an appeal was lodged by Pinnacle Point and the Minister dismissed the appeal and issued the Appeal RoD included in the amendment application.
2.) The reason being that our neighbouring properties in Dana Bay's, value would be adversely affected, should this development be allowed to proceed.	The continuation of the development and proposed densification within the original footprint will have no impact on the Dana Bay property values. The development is within an approved gated estate not within Dana Bay.
3.) Could you please inform me whether your company was involved with the previous assessment mentioned herein.	The original ECA and NEMA process was facilitated by HillLand Associates as the independent environmental assessment practitioners – a predecessor of HillLand Environmental.
4.) Can you please confirm if the work you currently undertook for this purpose, is for a complete new application for development on erf 19741, or whether it is merely a densification application for a previously approved development application.	As indicated in the <b>amendment application</b> , the application is for densification within the currently approved development area.
5.) Should your study be related only, to an additional ,densification application, or the original one ,please forward the originally approved and accepted documentation, regarding the previous study which was undertaken.	The current approval (ROD / EA) is included in the amendment application documentation (see appendix D)
7.) Could you please inform me, to what extent your company is involved in or may have been requested by whom soever ,to participate in the proposed study for the realignment of Flora road to join up with Crotz street, Kwanonqaba, which will result in the closure of our current and only entrance to Dana bay ,since its inception.	The relocation of Flora Road to Crotz street is approved and forms part of the Mossel Bay roads master plan. This realignment should have already been constructed by the Municipality, but has been delayed. It was a condition of the original Paradise Coast approval based on the SANRAL comments on the current Dana Bay access point which SANRAL deem to be too close to the existing N2 intersection.
8.) Should you be involved in the realignment above mentioned, as could be expected, could you please forward all necessary documentation in this regard including the record of public participation process followed for affected parties in The greater Dana bay area including Fishermans village and Moquini private estate who would be affected by this realignment	The realignment of Flora Road was a condition of the approval and requirement of the original Paradise Coast approval in order to confirm with the SANRAL conditions as they do not approve of the current Flora Road intersection or alignment. The assessment was included in the approval process for Paradise Coast.
9.) Your confirmation of my registration as requested above as well as attendance to the other requests would be appreciated at your earliest convenience.	Registration is confirmed

<b>WH &amp; JW Erasmus, Dana Bay Residents 27 September 2024</b>	
<p>Sal u asseblief toesien dat ons geregistreer word soos hierbo versoek. Ons is grondeienaars in Danabaai en hierdie verdigtingsaansoek het 'n inpak op die markwaarde van ons eiendomme. Erken ontvangs van hierdie skrywe asseblief ?</p>	<p>Hilland Environmental reply via email 27 September 2024: Registered and sent link for documents.</p> <p><b>Response:</b></p> <p>The development will not negatively impact the property values in Dana Bay. The development is within an existing approved gated community outside of Dana Bay.</p>
<b>Rene Orsmond, Dana Bay Resident, 29 September 2024</b>	
<p>GEAFFEKTEERDE EN GEINTERESEERDE PERSONE: RC &amp; R ORSMOND GEREGISTREERDE EIENAARS VAN : <input type="checkbox"/> 12 P NANASTRAAT DANABAAI ERF 7482000 Sal u asseblief toesien dat ons geregistreer word soos hierbo versoek.</p> <p>Ons is grond &amp; eiendom eienaars en woonagtig in Danabaai en is nie ten gunste van hierdie verdigtingsaansoek nie, aangesien:</p> <ul style="list-style-type: none"> <li>• ons in 2019 in Danabaai gekoop het juis vir die rustige omgewing en, VERDIGTINGS ONTWIKKELINGE gaan die teendeel daarvan veroorsaak;</li> <li>• ons 'n probleem het met die beginsel om enige VERDIGTINGS ONTWIKKELINGE in en om Danabaai, goed te keur;</li> <li>• dit Danabaai se oorspronklike ingang se voorkoms onooglik sal affekteer;</li> <li>• dit 'n negatiewe inpak op die markwaarde van ons eiendom sal veroorsaak;</li> </ul> <p>Erken asseblief ontvangs van hierdie skrywe.</p>	<p><u>Hilland Environmental reply via email 30 September 2024:</u></p> <p>Registered and sent link for the documents.</p> <p><b>Response:</b></p> <p>The development falls within the already approved (<b>approved in Feb 2008</b>) Paradise Coast development area so will not change the character of the area in Danabaai. The entrance is 2.78 km from this address which lies in the middle of Dana Bay.</p> <p>The planning principle of the municipality and province is to densify existing approved development areas rather than spread out into undeveloped areas.</p> <p>Dana Bay entrance road from Flora road off Louis Fourie road is already an approved realignment which should already have been built. Flora road will come out at Crotz street as approved.</p> <p>The development will in no way negatively impact on the property values in Dana Bay. The development is within an existing gated community outside of Dana Bay. Email responded to.</p>



<b>CA Buys, Mossel Bay Lifestyle, 29 September 2024</b>	
<p>As inwoner van Danabaai, neem ek kennis van die voorgestelde verandering van die beplande ontwikkeling op Erf 19741.</p> <ol style="list-style-type: none"> <li>Hiermee word versoek dat u asb sal toesien dat ek as belanghebbende gerigistreeer word.</li> <li>Verder is ek 'n grondeienaar in Danabaai en is van mening dat hierdie verdigtingsaansoek 'n impak op die markwaarde van my eiendom sal hé.</li> </ol>	<p><u>Hilland Environmental reply via email 30 September 2024:</u></p> <p>Registered and document link sent</p> <p><b>Response:</b></p> <p>The development will not negatively impact the property values in Dana Bay. The development is within an existing approved gated community outside of Dana Bay.</p>
<b>Anne-Marie Storm Buys, Dana Bay Resident, 1 October 2024</b>	
<p>Please provide a copy of the newspaper advert that was placed in the Mossel Bay Advertiser on 03 November 2024.</p> <p>Please provide proof (photo) of the 3 Site Notice Boards that was placed at visible and accessible locations surrounding the site boundaries on 03 November 2024.</p> <p>Please provide a copy of the draft Impact Report that was made available for comment from 08 November 2023 to 08 December 2023.</p>	<p><u>Hilland Environmental reply via email 1 October 2024:</u></p> <p>Please note that the amendment environmental impact report for Erf 19741, Dana Bay, is not associated with the dates mentioned in your email below – November 2024/December 2023. (refers to a different project).</p> <p>Attached please find the notification letter highlighting the commenting period and where the documents can be accessed (please follow the following link: <a href="https://hilland.co.za/public-processes/erf-19741/">https://hilland.co.za/public-processes/erf-19741/</a>).</p> <p><b>Response:</b></p> <p>This process was advertised in the Mossel Bay Advertiser on the 13<sup>th</sup> September 2024. Notifications were sent out on the 6<sup>th</sup> September 2024 and the reports have been available on our website since the 6<sup>th</sup> September 2024. Site notice was placed on the 12<sup>th</sup> September 2024 and the draft EIR was available from the 13<sup>th</sup> September – 14<sup>th</sup> October 2024 for comment.</p>
<p>Why is it not subject to the dates mentioned?</p>	<p>See the dates of advertising for this project above. The dates in your email refer to a completely different project.</p>
<b>Danie &amp; Levina Naude, Dana Bay Residents, 1 October 2024</b>	

Sal u asseblief toesien dat ons geregistreer word soos bo versoek. Ons is grond en eiendom eienaars en woonagtig in Danabaai en is NIE TEN GUNSTE VAN HIERDIE VERDIGTINGSAANSOEK NIE.

1. Ons in 2001 in Danabaai gekoop het vir die rustige omgewing en VERDIGTINGS ONTWIKKELINGE gaan teendeel daarvan veroorsaak.
2. Ons n probleem het met die beginsel om enige VERDIGTINGS ONTWIKKELINGE in en om Danabaai goed te keur.
3. Dit Danabaai se oorspronklike ingang se voorkoms onooglik sal affekteer.
4. Dit n negatiewe inpak op die markwaarde van ons eiendom sal veroorsaak.

Erken asseblief ontvangs van hierdie skrywe.

**Freddy en Janine Sneedan, Dana Bay resident, 1 October 2024**

1. Sal u asseblief toesien dat ek gerigistreer word soos hierbo versoek

HillLand Environmental reply via email 1 October 2024:

Baie dankie vir u registrasie.

Baie dankie vir u kommentaar, dit sal aangespreek word as deel van die proses.

Verslag en bylaes beskikbaar:  
<https://hilland.co.za/public-processes/erf-19741/>

**Response:**

The development falls within the already approved **(approved in Feb 2008)** Paradise Coast development area so will not change the character of the area in Danabaai in any way. The entrance to the site is 2.78 km from central Dana Bay.

The planning principle of the municipality and province is to densify existing approved development areas rather than spread out into undeveloped areas.

Dana Bay entrance road from Flora road off Louis Fourie road is already an approved realignment which should already have been built. Flora road will come out at Croz street as approved.

The development will in no way negatively impact on the property values in Dana Bay. The development is within an existing approved gated community.

Email responded to

HillLand Environmental reply via email 1 October 2024:

Baie dankie vir u registrasie.

Baie dankie vir u kommentaar, dit sal aangespreek word as deel van die proses.

<p>2. Ek is 'n grond eienaar op Danabaai en hierdie verdigtings aansoek het 'n inpak op die markwaarde van my eiendom.</p>	<p>Verslag en bylaes beskikbaar:  <a href="https://hilland.co.za/public-processes/erf-19741/">https://hilland.co.za/public-processes/erf-19741/</a></p> <p><b>Response:</b>  The development will in no way negatively impact on the property values in Dana Bay. The development is within an existing approved gated community outside of Dana Bay.</p>
<p><b>Heidi and Johann Lundie, Dana Bay residents, 1 October 2024</b></p>	
<p>1.Sal u asb toesien dat ek geregistreer word soos hierbo versoek.</p> <p>2.Ek is n grond eienaar op Danabaai en hierdie verdigtings aansoek het n inpak op die markwaarde van my eiendom.</p>	<p>HillLand Environmental reply via email 1 October 2024:</p> <p>Baie dankie vir u registrasie.  Baie dankie vir u kommentaar, dit sal aangespreek word as deel van die proses.</p> <p>Verslag en bylaes beskikbaar:  <a href="https://hilland.co.za/public-processes/erf-19741/">https://hilland.co.za/public-processes/erf-19741/</a></p> <p><b>Response:</b>  The development will in no way negatively impact on the property values in Dana Bay. The development ais within an existing approved gated community outside of Dana Bay.</p>
<p><b>Yulandi Holtzhausen, Dana Bay resident, 8 October 2024</b></p>	
<p>Please find herewith my concerns as an interested party and homeowner in Danabay.</p> <p>1. I have serious concern about the accuracy of the EIS findings.</p> <p>2. Red data fauna and flora species are present in the area. (Survey has been done and report will be made public asap)</p>	<p>Noted</p> <p>No report has been provided by the I&amp;AP.</p> <p>The terrestrial biodiversity and plant species specialist was ppointed and report was included with the availability of the EIR. Sensitive species noted during the assessment were listed on page 16, note that it includes the species</p>

3. The area has more than one wetland area. Active wetlands.

4. Previous geological survey, of the same area, varies from your findings.

that are **within the development zone. The remainder of the erf will be conserved and therefore no impact on these species.**

Table 1 extracted from the specialist report – blue highlighted names were recorded within the development zone proposed:

Table 1: List of plant species generated by the screening tool. Blue entries represent species that were observed during the site assessment.

Sensitivity	Feature(s)		
High	Leucospermum praecox	Medium	Sensitive species 268
Low	Low Sensitivity	Medium	Thamnochortus murii
Medium	Lampranthus cernuus	Medium	Sensitive species 1024
Medium	Lampranthus dubius	Medium	Athanasia cochlearifolia
Medium	Lampranthus fergusoniae	Medium	Agathosma emantha
Medium	Lampranthus foliosus	Medium	Agathosma murii
Medium	Lampranthus pseudiflorus	Medium	Agathosma riversdaleensis
Medium	Ruschia leptocalyx	Medium	Euchaeta albertiniana
Medium	Argyrolobium harnsianum	Medium	Muraltia cliffortifolia
Medium	Aspalathus campestris	Medium	Muraltia knysnaensis
Medium	Aspalathus obtusifolia	Medium	Polygala pubiflora
Medium	Lebeckia gracilis	Medium	Nanobubon hypogaeum
Medium	Leucodendron galpinii	Medium	Sensitive species 516
Medium	Leucospermum murii	Medium	Orosanthemum lawii
Medium	Wahlenbergia polyantha	Medium	Sensitive species 800
Medium	Selago glandulosa	Medium	Sensitive species 500
Medium	Selago willcaulis	Medium	Sensitive species 054
Medium	Erica unicolor subsp. mutica	Medium	Agathosma microcarpa
Medium	Hermannia lavandulifolia		
Medium	Sensitive species 153		

The specialist therefore adequately assessed the impact of the proposal on these species and provided the necessary mitigation measure for implementation. These have been included in the EMPr.

As per the specialist - Any additional SCC, or suitable LC species that can be used to aid in the recovery of fynbos outside of the PAOI must be included in a rescue plan and must be prepared for rehabilitation transplanting outside of the PAOI.

Note that a thorough plant search and rescue will be required in accordance with the EMPr.

These have been identified in the historic assessment, incorporated and protected with the proposed SDP and any potential impacts of the proposal on these areas have been assessed by the aquatic specialist.

This statement makes no sense. The geological survey included in the report is the National Geological survey

5. Dana Bay is a registered conservancy; this is the main reason for me moving here. This is under threat now.

data available. No additional geological survey was undertaken.

It should be noted that the development on erf 19741 was already approved in 2008 and development in accordance with the approved SDP can commence at any stage. The proposal is now to change the housing typologies (densify) with the same approved development zone, with the majority of the erf still being conserved. Therefore, the development zone should already be acknowledged and be taken into account by the conservancy as it is not a new proposal. The conservation areas and open space associated with this development are approx. 48ha in extent beyond the development zone and there has been large open space areas provided within the development zone as well (see figure below), which significantly contribute to conservation in the area. The development does not impact on the Dana Bay Conservancy in any manner. It provides for additional conservation area outside of the Dana Bay Conservancy.



SDP showing the open space areas in green

6. The density and location of this development will negatively impact the fauna and flora irreversibly.

The development zone remains the same as currently approved. The impact therefore of the development of the approval vs the densification remains exactly the same as there is NO encroachment outside the APPROVED development zone. Note that this was confirmed by the specialists. Any potential impacts of the proposal on fauna and flora have been assessed by the specialist and mitigation measures have been made and included in the EMP (to be implemented in all phases of this development).

<p>7. I am not against development, but not at this cost. My investment in my property here will also be affected negatively.</p> <p>8. The sewage infrastructure in Dana Bay is not capable of handling the added volumes as is. What is the plan here.</p> <p>9. Traffic and road access is also a main concern. We have only one entrance and exist. This is already congested.</p>	<p>It should be noted that the residential units are of high quality and is unlikely to reduce the market value of properties within Dana Bay. The erven will be smaller and investors that require larger erven will therefore prefer erven within Dana Bay and as such the market value may even increase.</p> <p>Please note that a full engineering report was included in the EIR. The report indicated the necessary upgrades that will be made by the developer to allow for the additional sewage that will be produced by the development. This was further confirmed by the Municipality. The sewage from Paradise Coast (including this densification) does not flow through Dana Bay.</p> <p>A traffic impact assessment has been included in the EIR that highlighted the necessary upgrades to accommodate the development and Dana Bay.</p>
<p><b>H van Gerve, Dana Bay resident, 08 October 2024</b></p>	
<p>Objecting in strongest possible terms on expansion of any development and crowding of Flora Road expansion.</p>	<p><u>HillLand Environmental response via email 9 October 2024:</u></p> <p>Thank you for your registration and comment. Please follow - <a href="https://hilland.co.za/public-processes/erf-19741/">https://hilland.co.za/public-processes/erf-19741/</a> (to download the documents), commenting period ends on 14 October 2024 should you have any additional comments.</p> <p><b>Response:</b> Your objection is noted. Please note that residential development on Erf 19741 is already approved. The proposal is to densify within the same approved development zone. The planning principle of the municipality and province is to densify existing approved development areas rather than spread out into undeveloped areas.</p> <p>A traffic impact assessment was included that assessed the additional traffic to be caused by the proposal and</p>

	<p>the recommendations made by the engineer will be captured by the municipality in their service level agreement.</p>
<p><b>Annamarie Buck, Dana Bay resident, 10 October 2024</b></p>	
<p>I am a property owner in Dana Bay and am against the proposed matter for the following reasons:</p> <ul style="list-style-type: none"> <li>• I bought in the Dana Bay area because of its quiet and peaceful nature and densification of the area will disturb this</li> <li>• Dana Bay has only 1 access road and at times this is already congested. Densification will only add to this problem</li> <li>• It will have a negative impact on the market values of the properties</li> </ul>	<p>Outeniqua Views falls within the already approved (<b>approved in Feb 2008</b>) Gated Paradise Coast development area so will not change the character of the area in Dana Bay in any way.</p> <p>The planning principle of the municipality and province is to densify existing approved development areas rather than spread out into undeveloped areas.</p> <p>The traffic assessment has taken the current traffic and proposed densification into account.</p> <p>The development will in no way negatively impact on the property values in Dana Bay. The development is within an existing gated community.</p>
<p><b>Erika Van Der Westhuizen Chairperson, Dana Bay Conservancy; 12 October 2024</b></p>	
<p>We are concerned about the densification as set out in the proposed application. At the meeting we were notified that the new development won't be part of the Urban Conservancy, but realistically we must realise that it will impact Dana Bay Urban Conservancy, in more than one way:</p> <ol style="list-style-type: none"> <li>1. Increase in traffic, especially since an enormous number of buildings will be erected, with additional options of flats to be added to the houses. It could potentially mean a "more than double" traffic impact. It looks like the impact study on traffic was done remotely from CT. In reality it will impact more than anticipated, since already now, with the development over the past few years, Dana Bay traffic has doubled. The trend of building duets has caused a huge rise in traffic, as it is.</li> </ol>	<p>SMEC is a local company, the main engineer is in Cape Town. However, the report is based on the existing conditions in the area and what the impact of the proposal will have, and recommendations were made based on that. SMEC are doing all the municipal traffic studies so are very aware of the current situation and the growth of the area in general.</p> <p>The recommendations made will be captured by the municipality in their service level agreement.</p>



	<p>Dana Bay, as with all municipal areas makes allowance for Duet units on erven over a certain size, this is already part of the approval and planning for the area. The increase in traffic will be dealt with locally and the road network changes are proposed to deal with this increase.</p> <p>There is no "option of flats to be added", the flats are included as double storey units as indicated on the plans and as taken into account in the traffic analysis.</p>
<p>2. An increase in cars on the road means potentially more "hit and runs" of our wildlife. Dana Bay isn't fenced in, which means animals are free roaming after food sources and water. At the moment it is already a challenge with speeding and car volumes which turns into more roadkill. We had the following incidents the past month on the exact part of the Flora road where development is going to take place; 31 Aug - a bushbuck, 1 Sept - a bushbuck, 5 Sept - a grysbokkie; 3 buck in 6 days. In the last 6 weeks, 2 big owls were also struck down at night, on this particular road. This is a real concern taking into account that this road will become extremely busy!</p>	<p>For within the estate - as recommended by the animal species specialist -</p> <ul style="list-style-type: none"> <li>• <i>Traffic calming measures must be imposed and enforced, particularly along roads immediately adjacent to the conservation areas. This will help not only in terms of avoiding collisions with animal species but will also reduce the traffic noise and general disturbance. These will be implemented.</i></li> </ul> <p>Note that as part of the Paradise Coast approval, Flora Road will be realigned, and the northern part of Paradise Coast will be fenced off as is the southern part. This will reduce the amount of wildlife crossing Flora Road associated with Paradise Coast. The conservation and connecting corridors within the development area are already included within the design.</p> <p>If there are incidents within Dana Bay already, it may be necessary for the municipality to implement traffic calming measures within Dana Bay itself to slow down traffic to take wildlife into account.</p>
<p>3. What is the general plan when building will start? At the moment the Conservancy Committee visits building sites in Dana Bay, prior to earthworks starting, to establish the need to remove wildlife and endemic plants.</p> <p>Your documents mention rehabilitation of the area. In the meeting, it was indicated that you will have a nursery to re-plant what you possibly can. How big will this initiative be to save plants? Many fynbos roots can't be disturbed, as Cathy might be aware.</p>	<p>It is anticipated that construction will commence with phase 1 within a year or two of approval. The last phases can only be constructed when the Municipality has constructed the Flora Road realignment.</p> <p>As per the existing EMPr – there is a whole list of items that the contractor and developer will need to comply with BEFORE construction may commence. This includes plant and animal rescue on the individual properties and along</p>

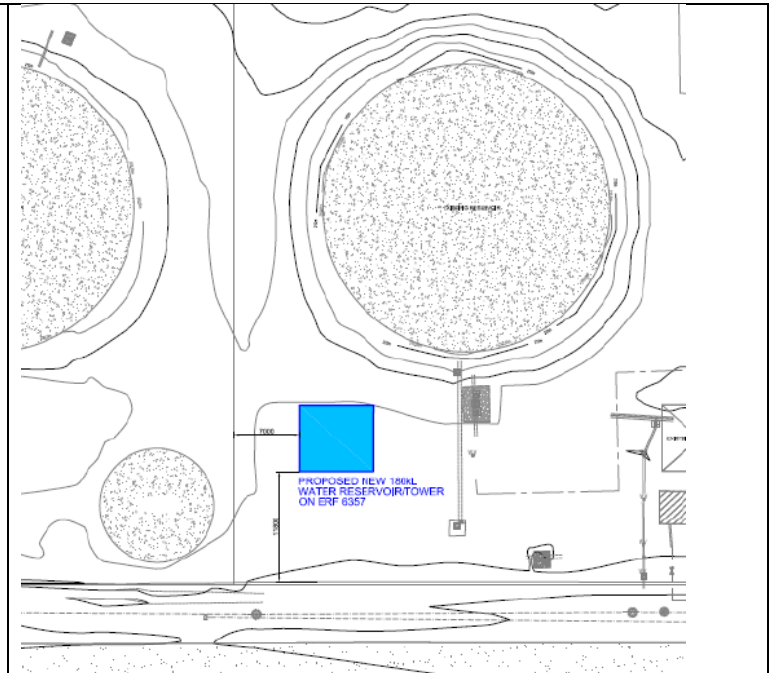
	<p>the road and services areas. This is already being implemented within Paradise Coast prior to any building commencing.</p> <p>This will be done in conjunction with the ECO, the transplantable species will be transplanted directly into the conservation area outside of the development zone, or retained in bags for replanting into the gardens around the new homes.</p> <p>Topsoil rescue will be done in order to rescue the fynbos seed and any dormant geophytes. This will be done within the entire footprint of the phase that will commence.</p> <p>Plant rescue is being successfully implemented within Paradise Coast with the current development taking place and the northern section of Paradise Coast will be no exception.</p>
<p>4. What about the wildlife prior to earthworks starting? These animals, from tortoises, amphibians, snakes and buck needs to be relocated? Please explain the plan of action as these animals belong to the Dana Bay Conservancy since there is no fencing at the moment? Will you need us to work together and maybe in conjunction with us, Cape Nature and WCIN? We are prepared to assist.</p>	<p>Mitigation measures have been included in the EMPr, Appendix K. Rescue of animals to be done prior to vegetation clearing. As is currently the case at Paradise Coast, any animals in a building footprint are rescued and moved into the conservation areas within the estate as this is their home and natural range. Builders are educated on the local wildlife and wildlife on the estate is protected and not harmed.</p> <p>Wildlife natural to the area will be accommodated within the large conservation areas that have been set aside for this purpose within the estate.</p> <p>Ownership of wildlife in the area is linked to the habitat in which they choose to live. The custodianship of ensuring the safety of such wildlife rests with the landowner of the land. Or as in the case with the Dana Bay Conservancy, the municipal open space forms part of the Dana Bay Conservancy, for which the</p>

	<p>Conservancy are the custodians in association with the Municipality.</p> <p>Should assistance be required at the time, help from the Conservancy will be welcomed.</p> <p>The EMPr allows for the following additional requirement in relation to Fauna.</p> <p><b>6.1.5 PROTECTION OF FAUNA (ANIMALS)</b></p> <ul style="list-style-type: none"> <li>• The removal, damage or disturbance of animals must be avoided.</li> <li>• Should any animal be caught up or trapped in the construction area, the ECO should be requested to assist (e.g., relocate snakes trapped in the construction trench etc.)</li> <li>• The contractor(s) shall be responsible for ensuring all employees are aware of the need to prevent any harmful effects on wildlife on or around the construction site as a result of their activities.</li> <li>• The contractor(s) shall ensure that no hunting, trapping, shooting, poisoning or otherwise disturbance of any fauna takes place.</li> </ul>
<p>5. If we assist to re-locate tortoises, would you think only temporary, so you can re-introduce to the area after completed and rehabilitation done to the area? Will the vegetation be similar as to when they were removed?</p>	<p>A full conservation area remains on the property where any animals will be relocated to. Indigenous vegetation within this conservation area and linking open space corridors remains unchanged from its existing vegetation composition, with ongoing alien vegetation management.</p> <p>The conservation areas outside the development zone will remain NATURAL (status quo) with alien control implemented. The landscaping within the development area will be indigenous vegetation.</p>
<p>6. On page 28 it mentions diamond mesh that will be used to cordon off the development site from the start. Will the mesh go into the ground so that animals can't go back into the area, overnight? Meaning the process mentioned in previous note 4, will have to be on a continuous basis.</p>	<p>Page 28 lists the mitigation measures set out by the visual specialist.</p> <p>Diamond mesh (or similar) demarcation is recommended by the specialist during construction phase to keep contractors within the development area and out of the surrounding conservation areas. Poles with fencing and green shade netting as visual barrier and silt fencing at the base to ensure no movement of silt into the surrounding areas in the event of heavy rains.</p>

	<p>The conservation areas and linking open space areas remain for the free movement of wildlife and are NO-GO areas for construction personnel.</p>
<p>7. Will you re-establish wildlife back into the area afterwards? Will they be fenced in, as that would be unacceptable?</p> <p>Will the electric fencing definitely only be on top of the clear view fencing or will it come down to the ground? On page 28 it says, "electric wiring above if required". At the moment, we have a concern with the fencing at Paradise Coast as some tortoises are electrified. About 3 weeks ago, a caracal was also electrified next to the fence at Paradise Coast. We were told that the first 25cm isn't electrified and that some fencing isn't right to the ground, which gives ample space for tortoises to go through; that isn't the case. Please consider this in your final design as a requirement from the Conservancy.</p>	<p>Wildlife will move naturally into the development zone from the surrounding private conservation areas on the property.</p> <p>The property will be fenced on the property boundary. The requirement is for electric fencing strands at the top of clear vu type fencing.</p> <p>Animal underpass areas can be included in the fencing to allow for movement of small animals under the fence.</p> <p>The lower strands of electric fencing on Paradise Coast have a lower voltage as per the approval for that fence.</p>
<p>8. Furthermore, we are concerned about the fact that one of the last areas in Dana Bay that has natural fynbos, will be lost due to the development. Well, most of it. When we participated in the Bioblitz, we saw that the area of development has the most fynbos. The areas identified as Conservation spaces, has very little fynbos, especially across the road. Mostly, invasive plants and trees. What is the plan here?</p>	<p>The development zone will remain as approved – it should be noted that the loss of vegetation in this area has already been taken into account in the planning. The vegetation on the property is the same vegetation as previously occurred throughout Dana Bay. The sensitive areas will remain conserved outside of the development zone (which is larger than the approved development zone). In accordance with the EMPr and requirements of NEMBA alien clearing and follow up control will be done throughout the lifetime of the development.</p> <p>Regular alien clearing has already been undertaken on the property and is ongoing. This is especially problematic as the neighbouring properties have no alien management and encroachment from these areas is an ongoing problem.</p>
<p>9. What else is involved in the rehabilitation of the fynbos area? It is very vague in the document. Only example mentioned is clearing of invasive plants. Will plants saved at construction phase, be re-introduced to the area? How big is the need to save current species, even the once not threatened? Can we maybe negotiate that some of these plants be transplanted somewhere else in Dana Bay, in order to save</p>	<p>The EMPr includes plant rescue to be done prior to vegetation clearing. Plants will be kept for rehabilitation within the estate or transplanted into the conservation areas in the property.</p>

<p>plants that you have no use for? Or even sponsored to the Diaz Museum? Or made available to residents in Dana Bay that are interested in endemic plants for their own gardens?</p>	<p>Alien vegetation clearing is an ongoing requirement in order to retain the natural vegetation, as is the periodic fynbos ecological burns that are required to maintain the fynbos areas. It should be noted that Paradise Coast is the only area within the Dana Bay area where the ecological burning program to maintain the various fynbos habitats is ongoing in accordance with their Environmental Approval.</p> <p>Should there be an excess of plant rescue material at any time, this can be made available to the Dana Bay Conservancy for rehabilitation.</p> <p>The Nature Conservation Ordinance permit applications for such relocation will need to be applied for by the Conservancy in such circumstances.</p>
<p>10. Also, relating to the previous point, when we walked the area for the Bioblitz, we recorded the following red listed plants: (some mentioned in the environment impact assessment)</p> <ul style="list-style-type: none"> <li>• <i>Gnidia chrysophylla</i> (near threatened)</li> <li>• <i>Hermannia lavandulifolia</i> (vulnerable)</li> <li>• <i>Leucospermum praecox</i> (vulnerable)</li> <li>• <i>Erica dispar</i> (near threatened)</li> <li>• [REDACTED] (endangered)</li> <li>• <i>Carpobrotus muiirii</i> (near threatened)</li> <li>• [REDACTED] (endangered)</li> </ul> <p>Is anyone aware of these plants in the area?</p>	<p>As per SANBI – “As per the best practise guideline that accompanies the Animal and Plant Species Protocol for the screening tool, please, remember <b><u>that the name of the sensitive species may not appear in the final EIA report nor any of the specialist reports released into the public domain.</u></b> It should be referred to as sensitive plant or sensitive animal and its threat status may be included, e.g. critically endangered sensitive plant or endangered sensitive animal.</p> <p>Therefore the species name may not appear in any public document and have been [REDACTED]</p> <p>The species found in the development zone have been included by the specialist and the impact on each assessed with the necessary mitigation measures to be implemented.</p> <p>Any sensitive species within the development zone will be correctly relocated to the conservation area prior to disturbance in that area.</p>

<p>11. It is a concern that so much of the Threatened Hartenbos Dune Thicket will be lost. But, couldn't we agree on lesser development and more open conservation spaces. Maybe, roll-out only Phase 1?</p>	<p>The majority of the erf is set out for conservation already. No encroachment into these areas and / or outside of the <b>approved</b> development zone.</p> <p>Please note that most of the site is NOT Hartenbos Dune Thicket, but is Fynbos. Development will be restricted to the already approved development areas and there will be NO encroachment into the conservation areas already set aside for this purpose.</p>
<p>12. Although it mentions a buffer of 15m around the wetland, the concern is real about the dust that will naturally settle everywhere due to earthworks / truck deliveries, etc. Dana Bay is well known for its wind, which could impact pollution of the water even further. Any other measures that could be considered to save the wetland from being impacted negatively? Clean water is a priority for species to survive there.</p>	<p>Specialist recommendations</p> <ul style="list-style-type: none"> <li>• The wetland and its associated buffer must be regarded as a No-Go area during the construction phase and no infrastructure must be constructed within this buffer or the wetland;</li> <li>• No stormwater from the development must be directed into the wetland or the buffer; and</li> <li>• No stockpiling of materials or laydown areas are permitted within the buffer.</li> </ul> <p>Dust control in general is a requirement in the EMPr during the construction phase.</p>
<p>13. To add to the previous point, it is also mentioning on page 27 about managing the wind-blowing as a factor. No mentioning on how this will be managed. We are firstly concerned about the dust, but also about the littering. Once the wind blow rubbish around, it settles in green belts and conservation areas and becomes a risk to wildlife and a health risk.</p>	<p>See mitigation measures included in the EMPr, Appendix K.</p> <p>Dust management and litter management are included in the EMPr and are monitored by the ECO during construction.</p>
<p>14. Your explanation around the newly, additional "to be erected" water tower (page 13), are confusing. Will the existing current area (where the existing tower is fenced in) be sufficient or will you clear not more than 300sqm of indigenous vegetation? If so, will these plants be saved? No mentioning of plan. Again, who will be responsible to remove animals and plants prior to work commencing? And, every morning again double check if any animals have snug back in overnight? Tortoises are territorial; they will have to be re-located far from here. We are currently doing this, as mentioned above. Who will be responsible, the developer or the municipality?</p>	<p>Please see engineering plan that shows the new reservoir tower in blue within the already disturbed utility area. Based on the site location, it is already heavily transformed and lacks vegetation and will not result in the clearance of 300m<sup>2</sup> or more of indigenous vegetation and relocation of animal species is unlikely to be necessary as there is no remaining vegetation on the site to provide habitat for any wildlife.</p>



**Extract from the engineering plan. Circles indicate the current infrastructure. New small tower indicated in blue.**



	<p><b>Approximate location indicated by the circle within the transformed area. The vegetation outside of the transformed space as shown on the aerial will remain undisturbed and space for any potential animals.</b></p> <p>As extracted from the EIR: "The existing tower uses an area of around 100m<sup>2</sup> and the vegetation is all transformed lawn in the area proposed for the tower."</p> <p>The construction phase will need to follow the EMPr that includes mitigation measures. The operation will form part of the current operation of Municipal infrastructure, no different to the current operational phase.</p>
<p>15. Will stormwater drains run anywhere towards the beach? We need to understand the marine pollution impact. I see this plan still needs to be submitted to the municipality in future. The reason we are enquiring, is because we are currently working on a project to see less plastics ending up in the oceans. Netting proposed at the stormwater outlet pipes on beaches. Please consider this when finalising your plans.</p>	<p>The property does not drain towards the ocean. It is north of the watershed.</p> <p>Storm water is directed towards a new artificial wetland area.</p> <p>The EMPr and operational management of the conservation areas and open space will ensure no litter in the conservation areas.</p>
<p>16. Will the stormwater drains on site be maintained and cleaned regularly as to not affect the environment negatively?</p>	<p>See mitigation measures included in the EMPr, Appendix K. the internal stormwater reticulation is guided into storm water attenuation ponds where the HOA will maintain.</p>
<p>17. The road that are planned by the municipality to go to Crotz street, is also a concern. This needs to be addressed to you and the municipality. We are concerned about the parrot beak tortoises that only live that side of the Flora road; not found at the development site. Will we be able to remove same, before bulldozers come in to make the road?</p>	<p>This road forms part of the Mossel Bay Roads Master Plan. The construction of this road will need to be done in accordance with the EMPr. The EMPr includes animal rescue activities to be undertaken prior to vegetation clearing. The timing of the construction is currently unknown, but there will be ECO control and monitoring at the time that it is constructed.</p>
<p>18. We do not want low-income housing and are pleased that you are not building those. At least a positive comment.</p>	<p>Noted. There was never any intention for low-income housing.</p>



<p>19. On page 30 and page 31, the wetland is classified under ONA, which means it is not a priority. Could that be changed on the map? It should be a priority and as mentioned elsewhere in the document, "a no-go" area.</p>	<p>This is CapeNature; Western Cape Biodiversity Spatial Plan (WCBSP, 2017) data and as such it is not data classified by the EAP nor can it be changed by the EAP. It is formally mapped as "Other Natural Area"</p> <p>Please note that as included in the assessment, specialist report as well as EMPr, the wetland areas and associated buffers are included as No-Go areas. The area is currently in the no-go conservation area of the development and will remain in the no-go conservation area of the development.</p>
<p>20. The Conservancy is happy about the comment that homeowners must only plant indigenous plants, locally sourced. Homeowners must be provided with a list of plants; we as a Conservancy can assist with this. I have a document that we share with Dana Bay residents on the same topic.</p>	<p>The Dana Bay plant booklet is noted. Kindly share a copy of the booklet electronically and it will be included as a reference.</p>
<p>21. Who will overlook this previous point to see that residents comply? HOA? Same goes with pollution and speeding, etc. Who will manage that on an ongoing basis?</p>	<p>HOA and ECO monitor compliance with the EMPr and the EA conditions as well as with estate rules and regulations.</p>
<p>22. I suggest that residents join the Conservancy as we are all about Conservation; plants, wildlife and marine conservation. We have anti-snare walks in the area, plant poaching is a reality as seen by some arrests that has been made recently, beach clean-ups, etc. Plant poaching can be reported to a hot line number.</p>	<p>Membership of the conservancy is noted. Kindly supply details that we can share with future landowners if they would like to join in their private capacity.</p>
<p>23. Suggested speed limit, in all of the estate, recommended to be 20km/h. This is due to tortoises, snakes, etc. that will move from and to the conservation areas, gardens and green spaces.</p>	<p>Noted – the estate will comply with what will be necessary to regulate and calm traffic</p>
<p>24. No explanation of "Traffic calming measures" on page 34. Does it mean speed bumps, signage (maybe with animal pictures on), speed limit bords, etc. Is this enforceable due to high probability of running over animals, i.e. tortoises, owls, snakes, etc?</p>	<p>The traffic calming measures implemented within estates normally include things like differences in road surface texture, landscaping areas, narrower sections on roads, speed dips or speed humps etc. these will be brought into the internal design of the estate. The road layout of housing areas and neighbourhoods has been designed to include pedestrian walkways, roads that dead-end etc. where the collector streets cross the open space corridor links, signage and other methods will need to be</p>

used to warn residents that animals and children are likely to be crossing roads.

The main municipal road (Flora Road) will have a new traffic circle which will slow traffic down and fencing to the north of the road between the road and the conservation area strip will also reduce the movement of animals into the main road. The municipality may consider putting up signs along this road or reducing speed limits along this road but this falls outside of the ambit of this application.

Within the estate, the urban design is such as to limit speeding and encourage slow traffic. Roads are not through roads but lead to small “living nodes” where children walking and cycling will be encouraged and vehicle movement will be slow and limited to the families living in that direct node.

25. The wetland study doesn't mention any amphibians that reside at the pond. It only refers to birds and plants (page 34) in the document. Was this not investigated? At the moment a whole chorus of frogs can be heard, day and night at the pond on the eastern side of the proposed development (close to Flora road). There was a speculation a year ago about some rare frog that was found at this particular pond. Don't know if it is only fabrication or truth to the story.

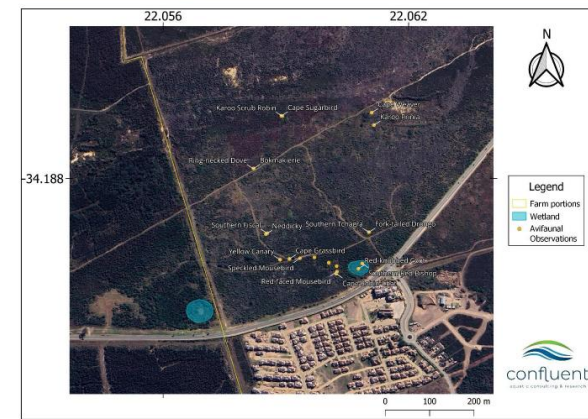


Figure 10: Location of avifaunal species observed during the site visit (many species were observed on more than one location within the property – the map refers to the first location the species was observed at).

An animal compliance statement has been included. See above map of species they noted.

Please note that the wetland areas remain incorporated into the SDP as sensitive conservation no-go areas (no change).

	<p>The wetland systems will therefore not be disrupted and will function as normal. The animals occupying the wetlands will be unharmed and undisturbed.</p> <p>In terms of the Screening tool there are no listed amphibians of concern for the area and as such an amphibian study was not a requirement.</p>
<p>26. Referring to the Heritage and Archaeological Resources recommendations on page 37, once work stops due to some important finding, could the Dana Bay Conservancy and WCIN be involved, if it is related to the environment? We would want the ECO to contact us any time if needed, to assist. If it could be added to the "Environmental Management Plan", please.</p>	<p>The heritage protocol and approvals require that HWC is notified in the event of significant finds.</p> <p>To date on Paradise Coast there have been no significant finds or requirement for work stoppage.</p> <p>Archaeological monitoring is required for all earthworks at Paradise Coast and this will continue in the area north of Flora Road.</p>
<p>27. So currently when building / construction happens at properties in Dana Bay, the following problematic findings were made:</p> <ul style="list-style-type: none"> <li>• Increase in animal poaching by builders, especially tortoises taken as a food source or snaring happening in the surrounding area to catch wildlife for bushmeat. This is a real threat.</li> <li>• Workers being picked up and dropped off at the robot at the entrance to Dana Bay. This causes accidents and delays to traffic for residents.</li> <li>• Pollution increases on site and surrounding areas. Workers sit in the field / green belts and destroy natural habitats.</li> <li>• At lunchtime, the workers walk to the shops in Dana Bay and have no respect for the area in terms of pollution.</li> </ul> <p>What rules have been designed regarding the workforce on site and off site?</p>	<p>Noted, please note that the construction phase of this proposal will be regulated through implementation of the approved EMPr which includes various mitigation measures to mitigate the impacts mentioned. Please refer to Appendix K. This is the case with all current construction at Paradise Coast and will be the same in the area to the north of Flora Road.</p> <p>Work and access is limited to the demarcated work area and no access beyond into the conservation and open spaces is permitted.</p> <p>Environmental induction and training and awareness is part of the requirements for all contractors managed by the ECO.</p> <p>To date there have been no incidents of poaching by contractors at Paradise Coast.</p>

	<p>There have been multiple incidents of plant poaching from outside parties and reporting to police for law enforcement.</p> <p>Construction staff management is strictly controlled in terms of the EMPr.</p> <p>Off-site and out of work hours control of construction staff falls outside the scope of this application and rest with the contractor's and their staff codes of conduct.</p> <p>Environmental awareness and training forms part of the EMPr and will hopefully lead to increase awareness off site.</p> <p>In relation to the problems experienced in Dana Bay, it may be worth the Conservancy including the use of an EMPr to control contractors within their area.</p>
<p>28. <i>Nothing included under 28 of the comments provided by I&amp;AP</i></p>	<p>Uncertain as to what this complaint refers to.</p> <p>I&amp;AP comments are included in the reports for submission AFTER the public comment period and cannot be included prior to being received.</p>
<p>29. Also, because of work opportunities at construction phase, Mossel Bay will see an influx of workers from all over the country, that will move here. The infrastructure across Kwa and Asla isn't really designed to cater for this. At the moment we have builders in Dana Bay on construction sites that doesn't even speak any SA languages. They come from other countries to work here as cheap labourers. The concerns are as follows:</p> <ul style="list-style-type: none"> <li>• They think bushmeat is for free and allowed</li> <li>• They might stay after the construction period as they have settled in. Where will they find work to continue staying the Mossel Bay?</li> <li>• Crime might increase in the long run</li> </ul>	<p>National Building Regulations apply to all construction contracts, and it is the responsibility of the main contractor and client to ensure that these are adhered to. These fall outside the scope of the Environmental Regulations.</p> <p>Provision of employment and job creation is a national imperative and Mossel Bay is no different to any other area in South Africa where employment and job creation is a much-needed social imperative.</p> <p>Where possible local contractors will be appointed, which provides work opportunities to the current local community.</p>

	<p>Attempts to control movement and people and dictate where they can and cant live or choose to live and seek employment is against the South African Constitution.</p>
<p>30. Furthermore, did I understand correctly at the meeting on the 8th, that the road and circle towards Apiesdoring street, will only come after completion of Phase 1? Why not first the road, then the development, to decrease impact on Dana Bay?</p>	<p>The realignment of Flora Road is part of the Mossel Bay Municipal Roads Master Plan and must be done by Mossel Bay Municipality when they determine that the infrastructure is required.</p> <p>The construction of the circle is part of the existing Service Level Agreement between the developers of Paradise Coast and the Mossel Bay Municipality and will be constructed in accordance with the service level agreement. As indicated at the meeting, the development only requires a single lane circle, but construction of a double lane circle is being planned to accommodate future demand within Dana Bay.</p> <p>The phasing of the development to coincide with the requirement for expansion of infrastructure is linked to the Service Level Agreement already signed and which will be signed between the municipality and the developer.</p> <p>The TIA indicates the point at which the expansion of the infrastructure is required in accordance with the current approved road realignment.</p>
<p>31. In terms of the Environmental Management Program Objectives and Outcomes:</p> <p>We don't necessarily agree with the controlled Ecological Fire Burning. Time and again we find dead animals caught in these fires, especially tortoises. Together with Cape Nature, WCIN and the SPCA, all the Conservancies of Mossel Bay are going to be part of a Project called "Every Tortoise Matters". The number of tortoises in the wild is on a decreasing streak and a big concern to us.</p> <p>Nothing mentioned in terms of saving plants, re-locating them of the bulk that might not be needed to be re-introduced. These plants will just die.</p>	<p>The Fynbos ecosystem is a fire driven ecosystem and requires ecological burning in order to support the species diversity and protect the various rare and endangered species. The threat to many of these fynbos species and the ecosystems themselves are often associated with the exclusion of fire and the associated invasion of alien species.</p> <p>Ecological burning of the Fynbos ecosystem at Paradise Coast is a condition of the approval and is required by</p>

<p>What about the butterflies? The Conservancy have been having conversations on how to establish a butterfly sanctuary / No-Go area together with the municipality on the piece of the property that Dave Edge's report refer to. Any idea on this? Will their part of the property remain as is, with the same vegetation, etc?</p>	<p>CapeNature and has been successfully implemented on the property since 2012.</p> <p>Animal species are adapted to the fire ecology of the fynbos ecosystem and ecological fires normally include refugia where animal species can shelter and then later return to the rejuvenated fynbos.</p> <p>Exclusion of fire results in the fynbos being replaced by thicket and forest ecosystems and the eventual loss of these sensitive species.</p> <p>Fynbos is adapted to fire and the plants need the fire to germinate, spread seed, resprout etc. Relocation of plants prior to an ecological burn is not necessary or an accepted practice. These are ecological burns, not manipulation and landscaping.</p> <p>Fire is required for the ecological integrity of habitat that the butterfly community requires. The conservation management of the conservation area remains unchanged with the densification application.</p>
<p>32. Lastly, the time frame for the development will impact Dana Bay, residents and environment, for a longer time period than the initial development plan. I mean, there are much more construction that will be happening. On page 60 it is mentioned that construction will commence within 12 months of approval. The biggest concern is the 10 years' time frame for completion of all phases. Can't we have a better understanding of this time frame please? The construction phase in particular.</p>	<p>The development approval has been in place since 2008 as part of the Paradise Coast development. Construction has been ongoing since that time. The intention is for the commencement of civil infrastructure to be installed in the first phase within the next 12-24 month period. The role out of the development will be guided by the market in creating the community that is being planned, this will be done in association with the Paradise Coast development south of Flora road and will be implemented as the market demand requires.</p> <p>The timeframe for the last phases will be dependant on when the Municipality implements the realignment of Flora Road.</p>

<p>1. One site notice board was placed at ground level between a fire hydrant and some other signage along the one site boundary on a stretch of road where the speed limit is 80 km/h, i.e. not visible and not easily accessible.</p> 	<p>Noted, NEMA requires a site notice to be placed at the property, hence the placement of the notice board at that point opposite the entrance to the southern section of Paradise Coast and in an area where there is space to park safely off the road and read the notice. This is the approved entrance to the property.</p>
<p>2. I had to stop and get out the car to read the notice which I only saw in the latter part of the public participation process (06 October 2024). This poses a safety risk based on the recent assaults along Flora Road as well as the fast-moving passing traffic.</p>	<p>The purpose of a site notice is to inform any interested party of the application in progress in terms of NEMA. The same notice was placed in the Mossel Bay Advertiser as is a requirement of the regulations and notifications were sent to surrounding landowners and Interested Parties.</p>
<p>3. Please note that the residents will not see this notice easily and this is therefore inconsistent with the intention of an inclusive public participation process.</p>	<p>Note that a notice was placed in the Mossel Bay Advertiser and based on social media a notice was placed by the Dana Bay Rate Payers on WhatsApp and Facebook. In terms of NEMA, neighbouring landowners and the Dana Bay conservancy were notified. The Rate Payers also arranged for a full public meeting. The public participation requirements in terms of NEMA have all been met and based on the involvement of the ratepayers in the public participation process, the advertising and notifications were more than adequate in getting the word out and spreading the word.</p>
<p>Comparative assessments and impact statement</p> <p>4. In accordance with the author all the impacts were assessed in 2010 and it is stated that no other impacts are anticipated – this is not an objective statement (page 38 of the .pdf document – actual pages not numbered)</p> <p><b>COMPARATIVE ASSESSMENT AND IMPACT STATEMENT</b></p> <p>All of the impacts associated with the development were assessed during the original EIA process (2010).</p> <p>It is not expected that any unknown or unanticipated impacts will be associated with the proposed amendment of the SDP.</p>	<p>This is a statement of fact.</p> <p>The assessments were undertaken as part of the original assessment and development approval process. For the amendment application, a comparative assessment of the approved development with the proposed changes is required.</p>

<p>5. This is seen as a flawed approach and not objective due to the following reasons:</p> <ul style="list-style-type: none"> <li>• significant timelapse</li> <li>• changes in the nature of the development (densification)</li> <li>• unknown changes in the natural environment</li> <li>• changes in legislation, regulations and policies promulgated and adopted within this period.</li> </ul> <p>This being said it is understood that despite this statement in the report some assessments were updated.</p>	<p>The comparative assessment compares the approved development area and footprint taking into account the densification, the changes in the natural environment, the changes in legislation and regulations and policies.</p> <p>The assessments undertaken were as indicated and as required – assessments of the comparison between the current approval (construction could commence immediately for the current approval) and the proposed changes to that approval through the densification proposed.</p>
<p>6. Ecological corridors are an essential element in conserving the biodiversity and proper functioning of ecosystems. Where the need for ecological corridors considered?</p>	<p>There is no change to the ecological corridors which already form part of the development approval and form part of the approx. 48ha of open space and conservation area which are integral to this development area. Open space areas have been included in the development zone as well, see Appendix B of the EIR.</p> <p>The development zone remains the same as approved.</p> <p>The remainder of the property (Approx 64% beyond the development zone) is already set aside for conservation and includes linking ecological corridors all within the estate's conservation area.</p>
<p>7. Heritage assessments older than 5 years are not in line with the South African Heritage Resources Act, 1999 (Act No. 25 of 1999) due to the linkage with the age of sites and features. Please indicate if an updated heritage resource assessment was done and/or provide written correspondence from the competent authority indicating that no new updated assessment is required.</p>	<p>HWC confirmed that their ROD still stands for this approved development area and the conditions of that approval are being implemented and will remain necessary to implement within the development area with the proposed densification of the development area.</p> <p>The HWC conditions contained in their ROD have been included in the assessment and EMPr.</p>



	<p>HWC indicated that no new studies are required for the densification within the approved development area.</p>
<p>8. Aquatic biodiversity assessment</p> <ul style="list-style-type: none"> <li>• A 15-m buffer was applied to the unchanneled water bodies – please provide the scientific method used to determine this buffer as densification has an impact on ecosystems and biodiversity.</li>   <li>• Please indicate if a larger buffer will be applicable during the construction phase to limit impact.</li>   <li>• Confirm that the delineation was done in accordance with the Department of Water and Sanitation Guidelines.</li>   <li>• Please provide a risk matrix for all water bodies</li>   <li>• Confirm if a water-use authorisation (likely a General Authorisation) is required</li> </ul>	<p>Please refer to the aquatic specialist report as it includes the buffers and standard methodology for determining buffers set out around the wetland area that is already included in the conservation area of the approved development area.</p> <p>Aquatic specialist confirms -  <i>“The method applied to determine buffers was according to Macfarlane and Bredin (2017) and is described in Section 2.4. This is considered the best practice method for determination of buffers.”</i></p> <p><i>A 15 m buffer is recommended for both the Construction and Operational phase.</i></p> <p><i>The delineation was done according to Department of Water and Sanitation Guidelines. The explanation of the method has been included in Section 2.2</i></p> <p><i>A DWS risk matrix has been added</i></p> <p><i>Based on the Low Risk determined by the DWS risk matrix, a General Authorisation will be required.</i></p> <p>The GA process is running separately to the NEMA amendment process.</p>
<p>Potable water and wastewater treatment demand calculations</p> <p>9. The engineering report uses The Neighbourhood Planning and Design Guide to calculate the water demand. Please provide a comparison with actual water-use figures for similar</p>	<p>Please see engineering report and GLS attachment which includes the potable water demand for the development as proposed as well as the confirmation of availability and the indication of the need for an additional pressure tower at Dana Bay.</p>

<p>households as the data should be easily available from the Municipality. This will serve as a verification of the demand.</p>	
<p>10. Further confirm the wastewater treatment demand.</p>	<p>Please see engineering report and GLS attachment Confirmation of wastewater treatment capacity for the required demand associated with the proposed development densification.</p>
<p>Stormwater management 11. Stormwater run-off up to the 5-year storm event was considered. Please indicate why The Neighbourhood Planning and Design Guide, Section L guidelines for new neighbourhoods or settlements stating a 1:20-year was not considered.</p> <p>L4.3.1 Flood protection</p> <p><u>The stormwater management system for all new neighbourhoods (or settlements) should be designed to safely contain floods up to the 1:20-year flood without the flooding of properties, i.e. within the road reserve boundaries.</u> Conditions should also be checked for the 1:100-year event to assess the risk of dwellings' floor levels being inundated. Floor levels should be 300 mm (minimum) above the 1:100 flood levels. For safety of road users, the specific energy (<math>E_s = h + v^2/2g</math>) of water flowing in public roadways should not exceed 0.6 m.</p> <p>The underground pipes of the minor system are sometimes assumed to be flowing full during a major storm event. However, inlets of the minor system are easily blocked by the debris associated with major floods and it is usually</p> <p style="text-align: right;">L68 ■</p>	<p>Response from Engineer – 2. STORMWATER MANAGEMENT</p> <p><i>The Mossel Bay Municipality has adopted the guidelines in the Blue Book and Red Book, described in paragraph 1, for Consulting Engineers to base their designs on when calculating the flowrates and determining the impact of stormwater in residential areas. Stormwater generated are conveyed in two types of systems ie the minor system [collection and controlled conveyance within the built up area] and the major system ie bulk conveyance, attenuation and outflow.</i></p> <p><i>The Blue Book suggests that the minor system must cater for a design storm recurrence interval between 2 years for Residential, 5 years for High Value Commercial and Public Buildings and between 5 and 10 years for Central Business District areas. For Outeniqua View a recurrence interval of 5 years will be used in the detailed designs of the collection and conveyance infrastructure consisting of catchpits and underground pipework. The Blue Book further allows for flows in excess of the 5 year and up to the 100 year storm recurrence interval to make use of a portion of the roadway to exit the development footprint such that the maximum water depth does not exceed 150 mm in roads and water is not allowed to escape the road servitude for Residential Roads and may not spread in excess of one lane for roads with a higher classification ie Access Collector and Local Distributor. Thus in summary, the 100 year recurrence interval will be used to safeguard residential property against stormwater runoff.</i></p>
<p>12.</p>	<p>See response above</p>

<p>It becomes further important as there will be an increased stormwater run-off in accordance with the statement on Page 41.</p>	
<p>Social and economic point of view 13. In accordance with the report: "The analysis of Outeniqua View provides compelling evidence that implementation of the development will alter the scope, nature, and impacts of the original or initial assessment in a minimal but positive manner. Based on an assessment from a social and economic point of view, affordable housing will be beneficial for the population of Dana Bay and Mossel Bay. Therefore, it is important that consideration of this development be authorized" (Urban-Econ, 2024).</p>	
<p>14. Please clarify how the densification which has a permanent and significant negative impact on the daily lives of residents of Dana Bay is plainly overlooked and dismissed.</p>	<p>It is unclear how densification within a gated community not located inside Dana Bay but as part of the adjacent approved Paradise Coast Development has a "permanent and significant negative impact on the daily lives of residents of Dana Bay"? other than that they will continue to drive past Paradise Coast on their way to Dana Bay as they currently do.</p>
<p>15. A revised and systematic review and comparison of densification effects and planning motivations are required as it is evident from the available reports that only general assumptions are applied. Please refer to the extensive body of research for your own assessment and please provide the compelling evidence.</p>	<p>Response from Delplan: <i>"The Mossel Bay SDF was recently updated, and the densification principle is clear. Especially densification along major corridors and routes. The roads master plan takes into consideration of the densification and no development will take place with major upgrades to the road and other infrastructure. The MSDF also states the importance of a hierarchy of housing opportunities to serve the whole community and demand. Densification of towns and cities is a Provincial policy and it will lead to the optimal use of available land and services inside the Urban Edge and lower pressure on land outside the Urban Edge which include high potential agricultural land as well as sensitive natural areas.</i></p>
<p>16. The impact of the proposed densification as well as the nature of the development (housing units between R300 000 and R 900 000) failed to assess the impact on the actual residents of Dana Bay.</p>	<p>This reference from the Socio-Economic assessment seems to have been taken out of context. The development is not aiming at a market in the R300-R900 000 price bracket. Response from the Socio-Economic specialist. <i>-"The proposed development concept does not suggest housing units between R300 000 and R900 000; rather the</i></p>

	<p><i>development of affordable housing ranging between R1.5 million and R4.2 million (see page 5)."</i></p> <p>iii. The new development proposal intends to provide a denser residential component that is more affordable to the catchment area.</p> <p>iv. The new concept therefore proposes that 761 units are developed, which will include:</p> <ul style="list-style-type: none"> <li>a. 2 bed stack simplexes of about 56m<sup>2</sup> – to sell for between R1.4 and R1.5 million</li> <li>b. Town houses – 2-to 3 beds – to sell for between R2.4 and R3.3 million</li> <li>c. Courtyard houses (up to 4 bedroomed) selling for between R3.7 and R4.2 million – which also come with a 31m<sup>2</sup> granny flat.</li> </ul> <p>Figure 1 illustrates the layout of the original development concept.</p> <p>5   Page</p>
<p>17. To further place low-cost affordable housing at the outskirts of a town far from the economic heart of Mossel Bay will place additional economic burden on the affected residents as there will be an increase in daily transport costs which may deter new buyers. In addition, there will be increased public transport vehicles in Dana Bay.</p>	<p>Once again, this comment appears to be based on an incorrect price bracket. The development is not aimed to be "low-cost affordable housing" it is aimed in the market from R1.4mil to R4.2mil. <i>"The amended development concept focuses on residential units ranging between R1.4 million and R4.2 million. No part of the development focuses on low-cost housing."</i></p>
<p>18. Please provide a reason why the current build-up and open-space configuration of Dana-Bay was not considered as an alternative or option. Any new development must consider the existing make-up of the township/suburb in order not to create further unforeseen social issues and alienate tax-payers. Dana Bay is a medium to high income community and to place high density development at the entrance to Dana Bay will unsettle the current community which seems unfair. Please provide adequate motivation.</p>	<p>It should be noted that the development zone on erf 19741 forms part of the existing approval of Paradise Coast. This application is for the amendment of the approved SDP within a gated estate that will be aimed at middle to high income families just like Dana Bay. The statement is based on the incorrect perception that the proposal is for "social housing".</p> <p><i>"The provision of affordable housing ranging between R1.4 million and R4.2 million at the entrance of Dana Bay will fit in with the current make-up of the town; the provision of such housing would unlikely create unforeseen social issues and alienate tax-payers. "</i></p>

<p>19. The assessment further fails to state/evaluate the success of the sale of the other low-cost housing provided along Louis Fourie Road near Heiderand. It is clear that may of the units are still vacant more than a year after completion.</p>	<p>This application is NOT for low-cost housing. The Social housing in Louis Fourie road referenced is not in any way similar to what is being proposed.</p>																														
<p>20. There is also a reference to international interest, holiday and tourism destination in the Garden Route – how does all this tie in with the low-cost development.</p>	<p>There is no association this is not a low-cost development  <i>“The amended development concept does not propose low cost housing, rather it proposes residential units ranging between R1.4 million and R4.2 million. Residential units within this price range are popular for investment purposes for both local and international buyers, this could be for permanent residence and/ or a holiday residence”</i></p>																														
<table border="1"> <thead> <tr> <th colspan="3">Socio-economic impacts from original development</th> <th colspan="3">Socio-economic impacts from amended development</th> </tr> <tr> <th>Significance of Impact before Mitigation/ Enhancement</th> <th>Status</th> <th>Significance</th> <th>Significance of Impact before Mitigation/ Enhancement</th> <th>Status</th> <th>Significance</th> </tr> </thead> <tbody> <tr> <td>Change in social composition - This impact is derived from a steady increase in international interest in the Garden Route that has contributed to a gradual change in the social composition. An increase in the retirees in Garden Route and Mossel Bay and the age group 55 years + invest in the district and</td> <td>Positive</td> <td>Medium</td> <td>Change in social composition - This impact is derived from a steady increase in international interest in the Garden Route that has contributed to a gradual change in the social composition. An increase in the retirees in Garden Route and Mossel Bay and the age group 55 years + invest in</td> <td>Positive</td> <td>Low</td> </tr> <tr> <td>Mossel Bay Town. The change in social composition is expected to increase because of the Paradise Coast Residential Goal Development, however, as a cumulative impact. The potential impact on the agricultural farming area (Dr. de Bruyn's property) is even less, since it is anticipated that that portion of land will be developed soon.</td> <td></td> <td></td> <td>the district and Mossel Bay Town. The change in social composition is expected to increase because of the Paradise Coast Residential Goal Development, however, as a cumulative impact. The potential impact on the agricultural farming area (Dr. de Bruyn's property) is even less, since it is anticipated that that portion of land will be developed soon.</td> <td></td> <td></td> </tr> <tr> <td>Public access and access to the coast - The property on which the Paradise Coast Residential Golf Estate is</td> <td>Positive</td> <td>Medium</td> <td>Public access and access to the coast - The property on which the Paradise Coast Residential Golf Estate is</td> <td>Positive</td> <td>Medium</td> </tr> </tbody> </table>		Socio-economic impacts from original development			Socio-economic impacts from amended development			Significance of Impact before Mitigation/ Enhancement	Status	Significance	Significance of Impact before Mitigation/ Enhancement	Status	Significance	Change in social composition - This impact is derived from a steady increase in international interest in the Garden Route that has contributed to a gradual change in the social composition. An increase in the retirees in Garden Route and Mossel Bay and the age group 55 years + invest in the district and	Positive	Medium	Change in social composition - This impact is derived from a steady increase in international interest in the Garden Route that has contributed to a gradual change in the social composition. An increase in the retirees in Garden Route and Mossel Bay and the age group 55 years + invest in	Positive	Low	Mossel Bay Town. The change in social composition is expected to increase because of the Paradise Coast Residential Goal Development, however, as a cumulative impact. The potential impact on the agricultural farming area (Dr. de Bruyn's property) is even less, since it is anticipated that that portion of land will be developed soon.			the district and Mossel Bay Town. The change in social composition is expected to increase because of the Paradise Coast Residential Goal Development, however, as a cumulative impact. The potential impact on the agricultural farming area (Dr. de Bruyn's property) is even less, since it is anticipated that that portion of land will be developed soon.			Public access and access to the coast - The property on which the Paradise Coast Residential Golf Estate is	Positive	Medium	Public access and access to the coast - The property on which the Paradise Coast Residential Golf Estate is	Positive	Medium
Socio-economic impacts from original development			Socio-economic impacts from amended development																												
Significance of Impact before Mitigation/ Enhancement	Status	Significance	Significance of Impact before Mitigation/ Enhancement	Status	Significance																										
Change in social composition - This impact is derived from a steady increase in international interest in the Garden Route that has contributed to a gradual change in the social composition. An increase in the retirees in Garden Route and Mossel Bay and the age group 55 years + invest in the district and	Positive	Medium	Change in social composition - This impact is derived from a steady increase in international interest in the Garden Route that has contributed to a gradual change in the social composition. An increase in the retirees in Garden Route and Mossel Bay and the age group 55 years + invest in	Positive	Low																										
Mossel Bay Town. The change in social composition is expected to increase because of the Paradise Coast Residential Goal Development, however, as a cumulative impact. The potential impact on the agricultural farming area (Dr. de Bruyn's property) is even less, since it is anticipated that that portion of land will be developed soon.			the district and Mossel Bay Town. The change in social composition is expected to increase because of the Paradise Coast Residential Goal Development, however, as a cumulative impact. The potential impact on the agricultural farming area (Dr. de Bruyn's property) is even less, since it is anticipated that that portion of land will be developed soon.																												
Public access and access to the coast - The property on which the Paradise Coast Residential Golf Estate is	Positive	Medium	Public access and access to the coast - The property on which the Paradise Coast Residential Golf Estate is	Positive	Medium																										
<p>21. Please indicate why you think that the significance of retirees investing in Dana Bay is low as they buy high value properties with associated significant tax contribution to the Municipality.</p>	<p><i>“It is not stated in the report that the significance of retirees investing in Dana Bay will be low. Retirees are mentioned under the impact of change in social composition, where the significance is changed to low as the initial retirement village proposed (250 units) was removed in the amended development concept.”</i></p>																														
<p>22. Please also clarify the text below.</p>	<p><i>“The construction and operational phase of the proposed development will create employment opportunities requiring varying skills levels, i.e., low, semi-, and high skilled. Varying skills sets would be required for planning and design, pre-construction and financing, construction, sales and marketing, property management and maintenance, etc.</i></p>																														

Socio-economic impacts from original development		Socio-economic impacts from amended development			
			better managed and even improved by this development.		
<p><b>Employment creation</b></p> <p>- Garden Route has evolved into a popular holiday and tourism destination. Tourism and construction are creating employment opportunities in the Garden Route. During the construction and operation phases the proposed development will draw unskilled, semi-skilled, and skilled workers within Mossel Bay. The construction phase will create 150 jobs golf course over a period of 12-18 months. In addition, 50-60 jobs will be created for civil services over a period of 203 years. The operation phase will create a total of 415-455 jobs. Local labour is recommended, and the developer must ensure that skills ensure that skills transfer programs are in place whenever specialists are brought in outside the Southern Cape.</p>	Positive	Medium-High	<p><b>Employment creation</b></p> <p>- Garden Route has evolved into a popular holiday and tourism destination. Tourism and construction are creating employment opportunities in the Garden Route. During the construction and operation phases the proposed development will draw unskilled, semi-skilled, and skilled workers within Mossel Bay. While the number of jobs cannot be quantified, the proposed development will impact positively on direct, indirect, and induced employment.</p>	Positive	Medium-High
<p>Construction phase employment opportunities are generally larger in number but shorter in duration, while operational phase employment opportunities are generally smaller in number but sustainable. Three types of employment creation will occur in each phase, namely, direct, indirect, and induced.</p> <ul style="list-style-type: none"> <li>• Direct employment creation refers to the jobs created specifically for the construction and subsequent management of a development.</li> <li>• Indirect employment refers to jobs created in businesses and industries that support the development.</li> </ul> <p>Induced employment refers to jobs created as a secondary effect of the development, i.e., arise out of increased demand for goods and services which in turn leads to job growth in various sectors."</p>					
<p>23. Note that any Spatial Development Framework is still subject to all other legislation and in this case various environmental and possibly procedural fairness legislation applies.</p>				Noted	
<p>Assessment of alternatives</p> <p>24. The amendment application fails to provide alternatives for assessment. Reference is made to reducing the height of buildings from 12-m height to 8-m. This is not an appropriate alternative as the 12-m height was not within the requirements of the municipal by-laws to begin with. Please provide appropriate alternatives.</p>				<p>The alternatives are to continue with the approved SDP vs the proposed SDP. The alternative to encroach outside of the approved development zone was rejected as the impact on the sensitive areas are too large. Within the approved development area, the proposed alternative has been provided. The alternative of a 12m height was within the height restriction of what would have been applied for, however the decision was made to keep the heights to 8m</p>	
<p>Access to and from Dana Bay</p> <p>25. This remains a problem and is now exacerbated by the proposed densification and associated construction activities.</p> <p>The construction phase and related activities will increase site-specific noise levels, dust and typical disturbance to the peace and quiet of the environment. These nuisances will be temporary and are typically anticipated with any construction activities</p>				<p>The current access remains for all construction (regardless of densification).</p> <p>Correct, it is the same as construction phase associated with Paradise Coast and houses within Dana Bay.</p>	

	These impacts will be mitigated through implementing the EMPr
<p>27. Please note that this assessment based on the single access road to the existing households of Dana Bay is an inaccurate general assessment. Without construction activities there are delays experience in Flora Road and no other alternative routes are available as what is usually the case in other suburbs. With recent and current construction activities in Louis Fourie Road, the delays are significant.</p>	<p>Traffic Assessment – the current access to the area remains unchanged, construction within Paradise Coast (including the northern area under consideration in this application) and Dana Bay in general remains unchanged. Construction for the services to be installed are no different to as they would be with the current approval and construction for the top structures will be phased over time.</p> <p>The municipality's roads masterplan in relation to Louis Fourie road and the emergency exit from Dana Bay to the west are already in planning and construction as the case may be.</p>
<p>28. The second access must be prioritised in line with the requirements of the residents of Dana Bay before the proposed development starts (if authorised). It has to be a safe tarred road in line with standard design criteria easily accessible with a normal car.</p>	The TIA confirms that access to this development area is not dependant on any alternative accesses that the municipality has in planning or currently under construction.
<p>29. There is an ongoing disregard for the safety of Dana Bay residents at times subject to social and natural risks and hazards. This will also impact any future residents. At this point if there are any significant problems no one can reach children, elderly parents, animals or property if the single access is blocked and no-one can leave.</p>	<p>This is a Mossel Bay roads planning matter and is unrelated to the application under consideration.</p> <p>That aside, the "emergency" exit for Dana Bay has already been constructed.</p>
<p>30. As the risks are somehow not obvious to the municipality, we request that a risk assessment be conducted in line with available standards and guidelines. Statements that residents must evacuate to beaches as the only option are disconnected from the lived reality of most people living here.</p>	This is a Mossel Bay roads planning matter and is unrelated to the application under consideration.
<p>31. The planning information must provide clarity of all options.</p>	The planning application is for densification and rezoning as per the standard municipal planning requirements.
<p>32. Will the new proposed roads as per some of the options provided be within the waste disposal site buffer area?</p>	This is unrelated to the application under consideration.
<p>Visual Impact Assessment: 33. The specialist did not consider the visual impact as it will be experienced by the residents of Dana Bay. Please provide a reason why this was omitted from the assessment.</p>	See full response from the Visual impact specialist – <i>"The theoretical viewshed, and the site visit to confirm, found that the residential areas of</i>

	<p>Danabaai would not fall within the zone of visual influence (outside of view) and that the sense of place of the existing Dana Bay areas would not be changed. This is due to the Danabaai residential areas located to the south of the ridgeline, and the development area located on the north facing slopes. As such, the residents of Dana Bay were excluded as Key Observation Points”.</p>
<p>34. Please assess the loss of natural beauty.</p>	<p>See full response from the VIA specialist – “As specified in the DEA&amp;DP Guideline for involving visual and aesthetic specialist in EIA Process, a specialist's role in the EIA process could be to assist with any or all of the following:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Describing the affected environment</li> <li><input type="checkbox"/> Describing the legal, policy and planning context</li> </ul> <p>In terms of these guidelines, it is a requirement for a VIA specialist to take planning into consideration. The screening for landscape planning found that the site was previously authorized for development, and that in order to accommodate middle income group need for more affordable houses, that higher density of development is a requirement for this development area.</p> <p>While the sense of place does currently depict open space where the development is proposed, the previous development footprint would have significantly changed this sense of place. However, within the previous planning landscape context, the large areas of open space would have retained the high value fynbos, creating pockets of development surrounded by open space. Other than a small change in development footprint, all these open space areas have been retained in the amended layout, allowing for the continuation of the previous buffering/ open space context that are the key components that would benchmark this local landscape as a clustered, medium-density urban landscape. With the establishment of the landscaping, in conjunction with the</p>



	<p><i>colour and design mitigations, this nodal development urban landscape would be enhanced.</i></p> <p><i>The landscape character of the site is not High value, and will change over time. The site overlooks Kwanaqaba Township/ Louis Fourie Drive corridor that depicts higher levels of visual contrast from the dwellings and infrastructure. With the further development of the Louis Fourie Drive corridor, the change to the local landscape and an urban corridor development area would also become more established.</i></p> <p><i>With regards to the visual impact from Flora Road, it must be noted that the road link to Louis Fourie Drive is to be closed. This would further the buffering of the development areas as seen from the road receptors, where much of the section of the new road would have open space / conservations areas on either side of the road with the pockets of development set back, and below the main view of the receptors.</i></p>
<p>From a resident's point of view: 35. The proposed densification will permanently alter the sense of place of Dana Bay.</p>	<p>See full response from the Visual impact specialist – <i>“The theoretical viewshed, and the site visit to confirm, found that the residential areas of Danabaai would not fall within the zone of visual influence (outside of view) and that the sense of place of the existing Dana Bay areas would not be changed. This is due to the Danabaai residential areas located to the south of the ridgeline, and the development area located on the north facing slopes. As such, the residents of Dana Bay were excluded as Key Observation Points”.</i></p>
<p>36. The proposed densification will permanently alter the entrance to Dana Bay.</p>	<p>The current approval, once complete, will alter the current entrance road to the north as the remainder of Paradise Coast has to the south of Flora Road.</p> <p>See full response from the VIA specialist – <i>“As specified in the DEA&amp;DP Guideline for involving visual and aesthetic specialist in EIA Process, a specialist's role in the EIA process could be to assist with any or all of the</i></p>

following:

- Describing the affected environment
- Describing the legal, policy and planning context

*In terms of these guidelines, it is a requirement for a VIA specialist to take planning into consideration. The screening for landscape planning found that the site was previously authorized for development, and that in order to accommodate middle income group need for more affordable houses, that higher density of development is a requirement for this development area.*

*While the sense of place does currently depict open space where the development is proposed, the previous development footprint would have significantly changed this sense of place. However, within the previous planning landscape context, the large areas of open space would have retained the high value fynbos, creating pockets of development surrounded by open space. Other than a small change in development footprint, all these open space areas have been retained in the amended layout, allowing for the continuation of the previous buffering/ open space context that are the key components that would benchmark this local landscape as a clustered, medium-density urban landscape. With the establishment of the landscaping, in conjunction with the colour and design mitigations, this nodal development urban landscape would be enhanced.*

*The landscape character of the site is not High value, and will change over time. The site overlooks Kwanaqaba Township/ Louis Fourie Drive corridor that depicts higher levels of visual contrast from the dwellings and infrastructure. With the further development of the Louis Fourie Drive corridor, the change to the local landscape and an urban corridor development area would also become more established.*

*With regards to the visual impact from Flora Road, it must be noted that the road link to Louis Fourie Drive is to be closed. This would further the buffering of the development areas as seen from the road receptors, where much of the section of the new road would have*

	<p><i>open space / conservations areas on either side of the road with the pockets of development set back, and below the main view of the receptors.</i></p>
<p>37. The assessment did not objectively and/or independently evaluate the impact on the existing Dana Bay residents.</p>	<p>See full response from the Visual impact specialist – <i>“The theoretical viewshed, and the site visit to confirm, found that the residential areas of Danabaai would not fall within the zone of visual influence (outside of view) and that the sense of place of the existing Dana Bay areas would not be changed. This is due to the Danabaai residential areas located to the south of the ridgeline, and the development area located on the north facing slopes. As such, the residents of Dana Bay were excluded as Key Observation Points”.</i></p> <p><i>“Regarding the comment on independence, this is taken seriously. I am not in any way affiliated or obligated to the developers, planners or EAP, and I am registered with the Association of Professional Heritage Practitioners as a Visual Impact Specialist. I am a member of the Landscape Heritage South Africa and am actively involved in working towards protection of High Value landscapes and visual resources that are a key component of our shared South African cultural landscape heritage.</i></p>
<p>38. The impact on me as resident is severe and I strongly object. At this stage depending the outcome of this application I am considering selling two properties and moving my residence and office. I can only hope that you will consider me and others like me in your objective assessment.</p>	<p>The choice of where the objector would like to live is a purely subjective one and has no relevance to this application.</p> <p>The development of this site has approval and has had approval since 2008. As with all urban growth and urban planning, Dana Bay itself was previously an undeveloped farmland and fynbos and thicket area. Now all that remains is some thicket in the valleys invaded with alien species and elements of fynbos on plots that have not yet been developed.</p>

<b>Dr David Norman Viljoen, Dana Bay resident, 11 October 2024</b>	
<p>Ek, Dr. David Norman Viljoen eienaar van erf 7904000, E. Lanata str 10, Danabaai wil registreer by julle.</p> <p>Ek is gekant teen die ontwikkeling Hilland by die ingang van Danabaai</p>	<p>Your objection is noted.</p> <p>Please note that "HilLand" is not the development name. We as HillLand Environmental are the independent Environmental Assessment Practitioners (EAPs) as stated in the report</p>
<b>Maryna Steyn, Moquini Coastal Estate resident, 14 October 2024</b>	
<p>761 nuwe wooneenhed x gemiddeld 3 of 4 mense per wooneenhed kan n groot invoed op die omgewing, stadsraad, dienste, paaie, wetstoepassers en bovenal die res van huidige inwoners van die gebied hê.</p> <p>Ons affree plek het reeds verander in n stop en ry verkeer, asblikrowers paradys en ongewensde voetgangers langs die paaie, baie skaars sigbaarheid van polisie en verkeerspersoneel. Ons tariewe om hier langs die kus te bly het duur geword en die toeloop van mense van buurstate en ander provinsies is kommerwekkend. Die SuidKaap het n bron van inkomste geword vir duisende mense van elders wat werksgeleenthede hier kom roof van plaaslike inwoners en net plak in tydelike strukture en geen sent betaal vir krag en water. Die geregistreerde wetsgehoorsame inwoners met eiendom moet betaal vir elke lig wat brand in die strate.</p> <p>Hoe gaan die ontwikkelaars bydrae dat nie nog meer van genoemde persone na Danabaai se verdigtingsgebied stroom nie? Gaan ontwikkelaars die Munisipaliteit nader om meer wetstoepassers na hierdie gebied te stuur en wel sigbare diens doen en nie net snelstrikke stel op teerpaaië of met kameras inwoners intimideer nie? Persone voor werksingangpersele vra vir id's?</p> <p>Die Sonbaaiers met honde by ingangspunte waar ook al na Danabaai sal verbied moet word. Hoeveel te meer werkers gaan met nuwe ontwikkelings daar vergader?</p>	<p>Note that the impact of these items has been assessed in the EIR.</p> <p>It should be noted that this is already an approved development, the proposal is to amend the approved SDP. It is a gated security estate and will not change the current situation in Dana Bay or the issues mentioned that are being experienced in Dana Bay. It is recommended that this "social" issues currently being experienced in Dana Bay are taken up with your ward councillor.</p> <p>This comment cannot be applied to the proposal as this is not an application for informal low-cost housing.</p> <p>Control of contractors and their employees is covered in the EMPr and this is already managed and fully operational within Paradise Coast to the south of Flora Road.</p>
<b>Mossel Bay Retirement and Lifestyle Village HOA, 14 October 2024</b>	
<p>The Owners' Association of the Mossel Bay Retirement and Lifestyle Village appreciates the opportunity to comment on the proposed development and regard it positively, however, with certain reservations. We would like to comment on the above proposal as follows:</p> <p>1. The report in conclusion states as follows:</p> <p>Environmental Authorisation (EA) was initially issued for the development of 270 (two hundred and seventy) Single Residential Erven, 1 (one) Business zone Erf and associated</p>	

<p>infrastructure on the remainder of erf 19741 (north of Flora Road), in addition to conservation areas (Open Space III) and private open space (Open Space II). Based on the current market needs and socio-economic need and desirability, the proposal is to densify the approved development footprint to offer a wider range of products to the market in keeping with the municipal densification policy within urban areas.</p> <p>A new development company will take over the development of the area north of Flora Road known currently as Outeniqua Views which may be confused with the similarly named Outeniqua View in Louis Fourie Road. As such the current EA will be split from the rest of the Paradise Coast's EA. The proposal is in line with the Municipal SDF and IDP and will result in various short and long-term positive socio-economic impacts. The proposed SDP has been assessed and supported by various specialists and all recommendations have been incorporated into the SDP and/or EMPr.</p> <p><b>At the outset, the Association welcomes the fact that the original footprint of the proposed development will remain, including the wetlands and other environmentally sensitive factors such as the butterfly colony.</b></p>	<p>Comments noted.</p>
<p>1. Comments will focus on the following aspects mentioned in the report: 2.1 Housing typologies;                  2.2 Availability of municipal services;                  2.3 Traffic impact;                  2.4 Visual impact; and                  2.5 Conservation areas.</p> <p>2.                  2.1 Housing typologies proposed will consist of the following:                  Phase 1 &amp; 2:</p> <ul style="list-style-type: none"> <li>. 288 Flats/apartments</li> <li>. 88 Single residential erven</li> <li>. 385 Townhouse erven</li> <li>. A total of 761 units</li> </ul> <p>The proposed structures will all fall within the municipal maximum height of 8m. The layout as depicted on Figure 6 shows the proposed development of flats and town houses close to Flora Road with visibility from the street. Although the development zone appears to be relative flat, the terrain steeps more towards the north (1:4 slope).</p> <p><b>The Association is of the opinion that the proposed areas for the flats and townhouse development should be located more to the north to minimize the visual impact from the street (Flora Road).</b></p>	<p>The comment in relation to the flats may be slightly incorrect – the “flats” fall within the same height restriction as the already approved single residential homes. They will look like normal group housing units, not dissimilar to the units south of Flora Road or those on the rest of the Paradise Coast development area.</p>

<p>2.2 Availability of municipal services:                  The report indicates that the municipality can provide municipal services (water, sewerage, refuse removal and electricity) to the subject property. Upgrading the existing water network and storage capacity to augment water pressure, the construction of a new pump-station for sewerage to connect with the Pinnacle Point Main Outfall and the relocation of the existing overhead power line crossing the development zone and the new bulk supply point, must be approved.  <b>The association is of the opinion that these recommendations must be affected to gain approval for the densification.</b></p>	<p>These are not recommendations for services, they are the requirements for services.</p>
<p>2.3 Traffic Impact:  <b>The impact on the traffic is a major concern and especially the effect on Flora Road due to the following:</b>                  The expected increase in traffic movements generated by 761 residential units in comparison to 270 residential units from the subject property. Table 3-1 of the study indicates the annual compound growth rate of 3% (conservatively) for 2023. New trips are estimated at 602 in/out trips (Table 4.2) and 150 for 2024. Added to that the Paradise Coast forecast for 2025 of 50 trips.  <b>These figures add to the existing congestive traffic in AM and PM peak periods. The congestion is a dangerous situation with a speed limit of 80 km/hr. The developer's proposal to construct the traffic circle with two circulating lanes, to reduce the speed limit to 60 km/hr. but to delay the proposed widening of Flora Road to a later stage, may bring temporary relief but is not ideal.</b>                  It is planned for the development to be served by a single access from Flora Road directly opposite the existing Paradise Coast Beach and Eco Estate. The following recommendations from the consultants are supported:                  "Following our assessment, the following capacity improvements are required as part of the planned development:                  2024 Forecast Year (Phase 1) :  <ul style="list-style-type: none"> <li>• Convert Flora Road and the Site Access (opposite Paradise Coast) junction to a four-legged roundabout with two circulating lanes</li> <li>• The development access should make provision for public transport as part thereof. Alternatively, a layby should be constructed along Flora Road on the downstream sides of the development access.</li> <li>• If public transport laybys are constructed along Flora Road on the downstream sides of the development access, it is recommended that pedestrian walkways be provided to link the laybys with the development access.</li> <li>• Reduce the speed limit along Flora Road to 60 km/h.</li> </ul></p>	<p>The recommended traffic upgrades in the TIA are anticipated to be requirements that the municipality will include in a service level agreement.                   Aspects like speed limits etc fall outside the scope of the NEMA EIA requirements as they are a function of the municipal planning approval process and master planning for traffic.</p>

<ul style="list-style-type: none"> <li>Widen the intersection of Flora Road and the Site Access (opposite Paradise Coast)".</li> </ul> <p>Added to the above, the re-alignment of Flora Road towards the East.</p> <p>A minimum ingress and egress throat length of 12 and 24 metres is required to serve the development respectively. It is, however, recommended that a minimum ingress and egress throat length of 18 and 24 metres be provided to accommodate a truck accessing the development. The access road should be designed in such a way to ensure that all access lanes are accessible with consideration of the anticipated queue lengths.</p> <p><b>The above recommendations must in our view be implemented as a priority to ensure safe and smooth traffic movement at the access point and by so doing add to the safety of motorists and pedestrians in view of the following.</b></p> <ul style="list-style-type: none"> <li>The number of residential/business units from Dana Bay which has increased threefold since 2008. Dana Bay is no longer a predominantly holiday resort. It has become a significant middle class residential area inclusive of a younger working-class population, many with school going children, who must get to work and school daily</li> <li>The expected future densification of portions of Paradise Coast, in line with the municipality's policy regarding densification.</li> <li>The recently approved increased residential units due to the densification of the Mossel Bay Retirement and Lifestyle Village section of Paradise Coast, since the original EA of 2008.</li> <li>The above increased traffic flow is in our view of major significance and needs serious consideration when intense or extreme densification is envisaged.</li> </ul>	
<ul style="list-style-type: none"> <li>2.4 Visual impact:</li> </ul> <p>The proposed height of the flats and townhouse of 8 meters in the areas allocated next to Flora Road will visually impact on the surrounding areas and development. It is suggested that these residential units be re-located further to the north of the property to diminish the visual impact as this area has been earmarked as a conservation area.</p>	<p>The height of 8m for the flats is the same height as that of normal residential units. The flats are designed to look like a single residential home so they will be indistinguishable from the surrounding residential areas from a visual perspective.</p> <p>They are located along the current Flora Road alignment and as such they will only be developed once Flora Road is realigned to the south. As such from Flora Road there will be no difference between the "flats" and any of the other proposed residential units.</p>
<ul style="list-style-type: none"> <li>2.5 Conservation areas:</li> </ul>	<p>The management and use of the conservation and open space areas in Paradise Coast north of Flora Road is</p>

<p>The provision of conservation areas in the development is welcomed. The endangerment of the flora and fauna in these areas should be minimized and the maintenance thereof should be concentrating on conservation of these areas in the environment. Intense densification will make this goal problematic if not impossible.</p> <p>Densification to the proposed levels could be detrimental to the conservation efforts as a greater number of people will have access to and potentially disturb these sensitive areas. This statement is particularly important if the opening of the areas to members of the development as a recreational area is anticipated.</p>	<p>exactly the same as the management and use of the conservation and open space areas in Paradise Coast south of Flora Road.</p> <p>Alien vegetation management and ecological burning programme are implemented in both areas and the recreational uses will be limited to walkways and birdwatching etc within the conservation areas as it is south of Flora Road.</p>
<p><b>Closing remarks:</b></p> <p>The owners of units in the Mossel Bay Retirement and Lifestyle Village bought their units expecting to be surrounded by a population of more senior and middle-class residents due to the size of the respective units. The Village is also known and has been marketed as a lifestyle and nature conservation area. Extreme densification has the potential to change these sentiments. Moderate densification can still be part of such an environment, but the extreme densification as proposed will be contrary to these views and sentiments.</p> <p>Furthermore, we must emphasize the need to supply the infrastructure to manage the increased traffic flow.</p> <p>We see the realignment of Flora Road to join Apiesdoring Street as a critical component to the management of this need.</p> <p>Despite the above we would like to indicate our support for moderate densification of the area if the above issues are adequately addressed.</p>	<p>The densification of the area north of Flora Road in Paradise Coast will be behind a secure gated estate similar to that of the existing Paradise Coast south of Flora Road. The units will be middle-class residents (with no age specification, much like the balance of Paradise Coast), where the residential area will be within a lifestyle and nature conservation area – again, similar to the rest of Paradise Coast south of Flora Road.</p> <p>Densification of this area will have no impact on the retirement village property which is behind high walls south of Flora Road.</p> <p>The only area where the two estates will meet each other and the rest of Dana Bay or anyone else traveling on Flora Road, will be on Flora road at the new traffic circle.</p> <p>With the proposed road and circle upgrades, the management of traffic will be accommodated. The municipal planning approval and service level agreement will cover traffic, and all service provision associated with the proposed densification.</p>
<p><b>Ward Councillor, Nickey Le Roux; 14 October 2024</b></p>	
<p>1. Traffic impact: Although the traffic impact study provides for a slight increase in the quantum of traffic on Flora Road, the demographics of motorists, namely aging and elderly drivers, are not or seem not to be considered. Dana Bay's significant number of retirees and aging residents, the Mossel Bay Retirement and Lifestyle Development, which also plans densification, as well as the new</p>	<p>Uncertain what the specific issue being referred to is. It would appear to be indicating that the elderly drivers (at the lifestyle village to the south of Flora Road) have slower response times?</p>



<p>development's residents, will contribute generously to a driver profile that reacts more slowly to impulses and will contribute to the increasing risk for road users.</p>	<p>The municipality in their road network and population profile planning will need to consider things like speed limits for areas where there are many elderly road users.</p> <p>The municipality may consider reducing the speed limit in the whole Dana Bay area due to the "aging residents".</p>
<p>2. It is unclear whether the butterfly sensitivity study (refer to the report for HillLand by Dave Edge &amp; Associates dated 25 December 2023) has any significant influence on the environmental impact study for the densification, especially considering the intention of further densification along Flora Road up to Louis Fourieweg, would succeed in retaining Floraweg, in part or in whole, in its current format.</p> <p>Currently, the experience is that the owner has erected two massive outdoor billboards in the sensitivity area, with one being illuminated 24 hours a day - contrary to all conservation guidelines. In addition, the so-called sensitivity area in front of the foot has been deforested and stripped of all native vegetation, jeopardizing, if not destroying, the survival of this butterfly population.</p>	<p>The Butterfly study confirms that the butterfly "reserve area" is not affected by the proposed densification within the approved development area.</p> <p>The signboards referred to are not in the butterfly conservation area and have no impact on the butterfly conservation area. The municipality is in control of signboards.</p>
<p>3. The developer's intention to turn the development into a gated estate affects an existing wetland and will mean that free-ranging wildlife will be cut off from one of their important water sources.</p> <p>Dana Bay Conservancy is one of the oldest registered urban conservancies and it will be a hindrance to its existence if the animals are deprived of access to water sources.</p>	<p>The Paradise Coast development area to the north of Flora Road has always been approved as a gated development similar to the gated estate to the south.</p> <p>The wetland area remains part of the conservation area within the development and as such wildlife will continue to have access to the wetland area and its water as the wetland is within the gated estate's conservation area.</p> <p>The Dana Bay conservancy will need to ensure that there is adequate access to water resources within the Dana Bay conservancy area.</p>
<p>4. In terms of the initial development requirements, the developer must erect a traffic circle - it is unclear from the information provided, whether the circle and/or proposed business node will jeopardize the existence of the active wetland.</p>	<p>The approved circle and approved business node have no impact on the wetland area which is in the conservation area and remains unchanged.</p>
<p>5. Currently, there are numerous free-ranging wildlife and other animals as well as listed rare vegetation that are at risk from development. It is not clear what the developer's intention is to protect these conservation-worthy plants and animals.</p>	<p>The conservation areas within the estate remain unchanged for conservation of both flora and fauna.</p> <p>The current approval requires plant rescue prior to construction of services or top-structures, and this remains a condition of the EMPr</p>
<p>6. The initial development requirements for Paradise Coast required the development to blend into the Dana Bay Conservation Area. The argument that this could not be done</p>	<p>Paradise Coast conserves and manages its own internal conservation areas and open space. This includes alien</p>

<p>because the land is not contiguous does not hold any credibility - in fact, until very recently there were no initiatives on the part of Paradise Coast to establish any link with the Dana Bay Conservation Area. On the contrary, an electric fence was erected between Paradise Coast on the west side of the development where evidence has since been found of animals including a bobcat being shocked to death by this fence - it is unclear what mitigation measures would apply to similar actions prevented, especially considering the intention to diamond mesh that will be used to cordon off the development site from the start.</p>	<p>clearing and ecological burning as is required. This will continue within the conservation and open space areas to the north of Flora Road.</p> <p>The diamond mesh fencing is a recommendation in the visual assessment for the temporary shade cloth screen during construction within development areas.</p> <p>From a safety and security perspective it has been necessary to install an electric fence as the previous fence was systematically stolen and facilities within the conservation area were being repeatedly vandalised, security was becoming an issue.</p> <p>The fence to the south includes allowances for the movement of wildlife.</p> <p>The security of the area to the north of Flora road will be essential as there is already poaching of both flora and fauna on the property which must be stopped.</p> <p>Mitigation measures to protect wildlife from the electric fence have been included.</p>
<p>7. What will be done to protect the numerous rare, even red-listed vegetation from the development, among others</p> <ul style="list-style-type: none"> <li>• <i>Gnidia chrysophylla</i> (near threatened)</li> <li>• <i>Hermannia lavandulifolia</i> (vulnerable)</li> <li>• <i>Leucospermum praecox</i> (vulnerable)</li> <li>• <i>Erica dispar</i> (near threatened)</li> <li>• [REDACTED]</li> <li>• <i>Carpobrotus muirii</i> (near threatened)</li> <li>• [REDACTED]</li> </ul>	<p>Endangered species are not permitted to be included in text of our reports and as such are blacked out [REDACTED]</p> <p>All species will be protected within the conservation and open space areas and plant rescue is a requirement of the EMPr currently and going forwards.</p> <p>Rehabilitation of all areas on the estate is a requirement of the EA.</p>

## **CONCLUSION**

The public participation process for the proposed amendment has come to an end. Based on the comments received during the process and responses provided in this report, in terms of the public participation process and comments raised, there are no matters that have not been satisfactorily answered or addressed and which would affect the decision making in these applications.

This report forms part of the submission of the Final EIR for DEADP's review and decision-making purposes.

DEADP is therefore now in a position to consider the application and make a decision in terms of the amendment of the environmental authorisation.