



Hilland Environmental

Environmental Assessment Practitioners

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SECTION 24G – APPLICATION

FOR
ERF 42, RIVERSDALE

Hoër Landbouskool



OAKDALE

Riversdal

Submitted by	Hilland Environmental
Hilland reference	RIV26/1327/14
Date	17 March 2026



**Western Cape
Government**
Environmental Affairs and
Development Planning

BETTER TOGETHER.

NEMA SECTION 24G APPLICATION COMPLETENESS CHECKLIST

IMPORTANT: Kindly ensure that this checklist is completed and attached to the NEMA SECTION 24G Application.

Please indicate by ticking the following below to serve as confirmation that the required information has been included in the application.

No.	Application Requirements	Please tick for confirmation
1.	Requirements of Preliminary Advertisement (pre-application public participation requirements including register of all I&APs), in accordance with Annexure A, Section D of the Section 24G Fine Regulations. (Note: Failure to meet the Regulation 8 will result in rejection of the application)	✓
2.	Application form has been completed and attached, which includes among others:	
	2.1. A list of all listed activities and/or waste management activities that was triggered when the development activity was commenced with.	✓
	2.2. A list of all similarly listed activities in terms of the current EIA regulations (if applicable).	✓
	2.3. A description of the receiving environment before commences of the activity(ies).	✓
	2.4. A description of the receiving environment after commences of the activity(ies).	✓
	2.5. All appendices and annexures:	
	2.5.1. Locality map	✓
	2.5.2. Site plans or/and Layout plan	✓
	2.5.3. Building plans (if applicable)	N/A
	2.5.4. Colour photographs	✓
	2.5.5. Biodiversity overlay map	✓
	2.5.6. Permit(s) / license(s) from any other organ of state including service letters from the municipality	✓
	2.5.7. Public participation information: including a copy of the register of interested and affected parties, the comments and responses report, proof of notices, advertisements, Land owner consent and any other public participation information	✓
	2.5.8. Environmental Management Programme – Alien control and farm management plan attach	✓
	2.5.9. Certified copy of Identity Document of Applicant	✓
	2.5.10. Certified copy of the title deed (or title deeds in the case of linear activities)	✓
	2.6. Signed declaration forms.	✓
3.	Are any specialist assessments required: e.g. Botanical , Hydro-geological, soil, socio-economic?	<u>Y</u> N
	3.1. If yes, has the specialist assessment report been attached to the application?	✓
4.	An assessment of the impacts of the activity or activities in terms of the following categories:	
	• Socio-economic	✓
	• Biodiversity	✓
	• Sense of place &/or Heritage/ Cultural	✓
	• Any pollution or environmental degradation which has been, is being, is being or may be caused	✓
5.	A methodology of how the investigation into the impacts associated with the unlawful activity was undertaken.	✓
6.	Completed and attached representations of Annexure A, Section A (Directives) in terms of the S24G Fine Regulations: Information/ Representation submitted in terms of any Directives the Minister/ decision maker may issue in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA) s24G(1)(b)(i)-(viii).	✓
7.	Completed and attached representations in terms of Annexure A, Section B (Deferral) of the S24G Fine Regulations.	✓

8.	Completed and attached representations in terms of Annexure A, Section C, Part 1 (Fine Quantum based on the assessment as specified above (4)).	✓
	Confirmation that Annexure A, Section C, Part 1 has been completed by an environmental assessment practitioner (EAP)	✓
9.	Compliance history of the applicant:	
	9.1. Completed Annexure A, Section C, Part 2 and 3; namely:	
	9.1.1. Whether or not administrative enforcement notices, including pre -notices where appropriate, have previously been issued to the applicant in respect of a contravention of section 24F(1) of the NEMA and/or section 20(b) of the National Environmental Management: Waste Act (Act 59 of 2008) (NEM: WA).	✓
	9.1.2. Whether or not the applicant has previously been convicted in respect of a contravention of section 24F(1) of the Act and /or section 20(b) of the NEM: WA;	✓
	9.1.3. Whether or not the applicant has previously submitted a section 24G application in respect of an activity or activities which commenced prior to the activity or activities that are the subject of the current application; and	✓
	9.1.4. Whether the applicant is a firm or a natural person. (see Section 24G Fine Regulations for definition of "firm")	✓
	9.2. Provided information or whether or not any of the directors of the applicant firm are, or were, at the relevant time, directors of a firm to whom the above (9.1.1. - 9.1.3.) applies;	✓
	9.3. Advise on whether an applicant who is a natural person is, or was, at the relevant time a director of a firm to whom the above (9.1.1.- 9.1.3.) may apply.	✓
10.	Consultation with relevant State departments in terms of section 24O(2) & 24O(3) of the NEMA.	
	10.1 Proof of Consultation with relevant State departments, including, <i>inter alia</i> , notices, adverts etc.	✓
	10.2 Copies of comments and responses included in the application.	In progress
	10.2 Comments and Response report attached to the application.	In progress
11.	Public Participation Process undertaken in terms of Chapter 6 of the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations, 2014") (GN No. R.326 of 7 April 2017) (if conducted/undertaken)	✓



Section 24G Application Form for the consequences of unlawful commencement of listed activity/ies in terms of the:

- **National Environmental Management Act, 1998 (Act No. 107 of 1998), ("NEMA");**
- **National Environmental Management: Waste Act, 2008 (Act 59 of 2008) ("NEM: WA")**

April 2018

Form Number S24GAF/04/2018

Kindly note that:

1. This application must be submitted where a person has commenced with a listed or specified activity without an environmental authorisation in contravention of section 24F(1) of NEMA (i.e. where the person commenced with an activity listed or specified in terms of section 24(2) (a) or (b) of NEMA - the activities contained in the EIA Listing Notices) or has commenced, undertaken or conducted a waste management activity without a waste management licence in terms of section 20 (b) of the NEM:WA.
2. This **Application Form** must be completed for all section 24G applications, by an independent Environmental Assessment Practitioner ("EAP").
3. This Application Form is current as of 01 April 2018. It is the responsibility of the Applicant/EAP to ascertain whether subsequent versions of the Application Form have been published or produced by the competent authority. Note that this Application Form replaces all the previous versions. This updated Application Form must be used for all new applications submitted from 01 April 2018.
4. **The contents of this Application Form includes the following:**
 - PART 1 -**
 - Section A: Background Information**
 - Section B: Activity Information**
 - Section C: Description of Receiving Environment**
 - Section D: Need and Desirability**
 - Section E: Alternatives**
 - Section F: Impact Assessment, Management, Mitigation and Monitoring Measures**
 - Section G: Assessment Methodologies and Criteria, Gaps in Knowledge, underlying Assumptions and Uncertainties**
 - Section H: Recommendations of the EAP**
 - Section I: Representations - Response to an Incident or Emergency Situation**
 - Section J: Public Participation Process**
 - PART 2 -**
 - ANNEXURE A of Fine Regulations**
 - Section A: Directives**
 - Section B: Deferral of the Application**
 - Section C: Quantum of the section 24G fine**
 - Section D: Preliminary advertisement**
 - PART 3 -**
 - Appendices and Declarations**
 - PART 4 -**
 - ANNEXURE B: Waste Management Activity Supporting Information (if relevant)**
5. An independent EAP must be appointed to complete the required sections (in terms of NEMA and its Regulations) of the Application Form on behalf of the applicant; the declaration of independence must be completed by the independent EAP and submitted with this Application Form. If a specialist report is required, the specialist will also be required to complete the declaration of independence.
6. Two hard copies (including the original) and one electronic copy (CD/DVD/Flash drive) of this application form must be submitted.

7. The required information must be typed within the spaces provided. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. The space provided extend as each space is filled with typing. **A legible font type and size must be used when completing the form.** A digital copy of the Application Form is available on the Department's website <https://www.westerncape.gov.za/eadp/>
8. The use of "not applicable" in the Application Form must be done with circumspection.
- 9. No faxed or e-mailed application forms will be accepted.**
10. Unless protected by law, all information contained in and attached to this application will become public information on receipt by the competent authority. Please note that, unless exemption has been granted in terms of the National Exemption Regulations published under GN R994 in GG 38303 of 8 December 2014, any Interested and Affected Party should be provided with the information contained in and attached to this Application Form as well as any subsequent information submitted.
11. This Application Form must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department.

PROCESS TO BE FOLLOWED:

- a) **Prior to submission of an Application Form**, the applicant is required to undertake a pre-application public participation process in terms of Regulation 8 of the Regulations relating to the procedure to be followed and criteria to be considered when determining an appropriate fine in terms of section 24G published in the Government Gazette on 20 July 2017, Gazette No 40994, No. R. 698 ("Section 24G Fine Regulations").
- b) Together with the submission of a section 24G Application Form, the form **must include Proof of compliance of with Regulation 8** of the Section 24G Fine Regulations, including, but not limited to, proof of the pre-application advertisement in a local newspaper and register of I&APs.
- c) The Department will acknowledge receipt of the application (within 14 days) and provide the Applicant / EAP with the relevant application reference number to be used in all future correspondence and the application public participation processes.
- d) Upon receipt of the application, the MEC/Competent Authority may direct the applicant in terms of section 24G(1)(i-viii) of the NEMA.
- e) In terms of the provisions of section 24G of NEMA, the applicant must pay an administrative fine up to a maximum of R5 million before the MEC/Competent Authority decides on the application.
- f) The applicant **must within 14 days** of receipt of the determination of the quantum of the fine, ensure that all registered interested and affected parties are notified of the determination of the quantum of the fine, including the reasons and provided with access to the determination.
- g) The administrative fine **must be paid within the time period stipulated** in the determination. Failure to pay the fine within the specified period, will result in the lapse of the application and any partial amounts paid in will not be refunded.
- h) **Proof of payment of the fine must be submitted to the Department.** Upon payment of the administrative fine, the MEC/Competent Authority may-
 - refuse to issue an environmental authorisation; or
 - issue an environmental authorisation to such person to continue, conduct or undertake the activity subject to such conditions as may be deemed necessary, which environmental authorisation shall only take effect from the date on which it has been issued; or
 - direct the applicant to provide further information or take further steps prior to making a decision provided for above;
 - together with the above decision the MEC/Competent Authority may direct a person to rehabilitate the environment within such time and subject to such conditions as may deem necessary or take any other steps necessary under the circumstances.

PLEASE NOTE THE FOLLOWING:

1. Failure to comply with a directive may result in the institution of appropriate legal action as is deemed necessary and as provided for in the legislation.
2. The submission of an application or the granting of an environmental authorisation shall in no way derogate from—
 - (a) the environmental management inspector's or the South African Police Services' authority to investigate any transgression in terms of NEMA or any specific environmental management Act;

- (b) the National Prosecuting Authority's legal authority to institute any criminal prosecution.
3. If, at any stage after the submission of an application it comes to the attention of the Minister, Minister for mineral resources or MEC that the applicant is under criminal investigation for the contravention of or failure to comply with section 24F(1) or section 20(b) of the *National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)*, the Minister, Minister for mineral resources or MEC may defer a decision to issue an environmental authorisation until such time that the investigation is concluded and—
- (a) the National Prosecuting Authority has decided not to institute prosecution in respect of such contravention or failure;
 - (b) the applicant concerned is acquitted or found not guilty after prosecution in respect of such contravention or failure has been instituted; or
 - (c) the applicant concerned has been convicted by a court of law of an offence in respect of such contravention or failure and the applicant has in respect of the conviction exhausted all the recognised legal proceedings pertaining to appeal or review.
4. A person is guilty of an offence if that person:
- Prior to submission of a section 24G application:
 - o fails, in terms of Regulation 8(1), to place a preliminary advertisement in a local newspaper in circulation in the area in which the activity was, or activities were, commenced and on the applicant's website, if any or
 - o fails, in terms of Regulation 8(2), to comply with the advertisement requirements set out in Annexure A, section D or
 - o fails, in terms of Regulation 8(3), to open and maintain a register of interested and affected parties)); or
 - o fails, in terms of Regulation 8(4), to attach to the application form the register of interested and affected parties, which must be included in the report, or form part of the information submitted in terms of section 24G(1) of NEMA.
 - Provides incorrect, false or misleading information in any form, including in any document submitted to a competent authority in terms of the Section 24G Fine Regulations or omits information that may have an influence on the outcome of a recommendation of the fine committee or determination of the competent authority.
5. A person convicted of an offence in terms of these Regulations is liable to a fine not exceeding R5 million or to imprisonment for a period not exceeding 5 years, and in the case of a second or subsequent conviction to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, and in both instances to both such fine and such imprisonment.
-

DEPARTMENTAL DETAILS

Department of Environmental Affairs
and Development Planning,
Directorate: Environmental Governance
Attention: Sub-directorate: Rectification
Private Bag X9086
Cape Town, 8000

Registry Office
1st Floor Utilitas Building
1 Dorp Street, Cape Town

Queries should be directed to the Sub-
director: Rectification at:
Tel: (021) 483-5827 Fax: (021) 483-4033

View the Department's website on
<http://www.westerncape.gov.za/eadp> for the
latest version of the documents

DEPARTMENTAL REFERENCE NUMBER(S) (for official use)

File Reference number (S24G)	
Administrative Fine Reference	

DEPARTMENTAL REFERENCE NUMBER(S) (to be completed by the EAP)

File Reference number (Enforcement), if applicable	14/1/1/E3/8/2/3/L1338/23
File reference number (EIA), if applicable:	
File reference number (Waste), if applicable:	
File reference number (Other (specify)):	

PART 1**PROJECT TITLE**

The clearance of vegetation and ongoing management and use of previously cultivated lands and creation of new cultivated land and access track for livestock on Erf 42, Riversdale (Hoër Landbouskool Oakdale)

An application is being made in terms of S24G to rectify and retain the new cultivated lands, continue to agriculturally manage the historic cultivated lands and use the new access track created, while closing the historic access track.

RELEVANT REGION IN WHICH THE ACTIVITY COMMENCED

Cross out the appropriate box "X" in which region the unlawful activity/ies has commenced.

REGION 1 City of Cape Town and West Coast District	REGION 2 Cape Winelands District and Overberg District	REGION 3 Central Karoo District and Eden District
		X

SECTION A: BACKGROUND INFORMATION**1. APPLICANT PROFILE INDEX**

Cross out the appropriate box "X".

1.1	The applicant is a Natural Person (individual)					
1.2	The applicant is a Firm (i.e. any body incorporated by, or established in terms of, any law as well as any partnership, trust, parastatal or organ of state)					X
1.2.1	If a firm, please tick the relevant box below:					
	Body Corporate	Partnership	Trust	Parastatal	Organ of State	
	Directors of a Company	Members of a Board	Other, please specify	Governing Body		

Applicant's details (duplicate this section where there is more than one applicant)	Beheerliggaam van Hoër Landbouskool Oakdale – c/o Mr Willem du Buisson (Skoolhoof)
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Applicant Name:	Beheerliggaam van Hoër Landbouskool Oakdale – c/o Mr Willem du Buisson (Skoolhoof)		
RSA Identity Number/ Passport Number of Applicant, if natural person:	Cemis nr 012 110 6203 (Western Cape Dep of Education reg. nr.)		
Name of Firm (if applicable):	Hoer Landbouskool Oakdale		
Firm Registration Number:	Cemis nr 012 110 6203 (Western Cape Dep of Education reg. nr.)		
Contact Person at the Firm:	Mr Willem du Buisson		
List of all (as applicable at the relevant time):	Please insert the names and RSA ID numbers of the relevant persons below – (In the list below, delete the firms that are not applicable to this application)		
Executive committee or other managing body of a corporate body or parastatal; or	Name: Willem du Buisson – School Principle RSA ID No. Name: RSA ID No.		
Postal address:	Ladismith weg, Oakdale Riversdale 6670		
	Mnr. Willem du Buisson SKOOLHOOF Hoër Landbouskool Oakdale Ladismithweg, Oakdale, Riversdal, 6670 Tel: 028 713 2549 Sel: 084 302 6593 E-pos: hoof@oakdale.co.za Webwerf: www.oakdale.co.za		Postal code: 6670
Telephone:	(028) 713 2549	Cell:	084 302 6593
E-mail:	hoof@oakdale.co.za	Fax:	()
Project Consultant	N/A		
Contact person:			
Postal address:			
		Postal code:	
Telephone:	()	Cell:	
E-mail:		Fax:	()
Name of the Environmental Assessment Practitioner ("EAP") responsible for the application:	HillLand Environmental represented by Cathy Avierinos		
Company name (if any):	HillLand Environmental		
Postal address:	PO Box 590		
	George	Postal code:	6530
Telephone:	0448890229	Cell:	0825586589
E-mail:	cathy@hilland.co.za / admin@hilland.co.za	Fax:	()
EAP Qualifications	BSc Hons		
EAP Registrations/Associations	EAPASA – 2019/1053		
Name of the Landowner:	Western Cape Department of Education / Public Works		
Name of the contact person for the land owner (if other):	As above		
Postal address:			
		Postal code:	
Telephone:	()	Cell:	
E-mail:		Fax:	()
Person in control of land:	As above		
Contact person:			
Postal address:			

		Postal code:	
Telephone:	()	Cell:	
E-mail:		Fax:	()

Please note:

In instances where there is more than one landowner, please attach a list of landowners with their contact details to the back of this form.

A certified copy of the applicant's (if natural person), alternatively a director's (as defined), Identity Document must be attached to the application.

A certified copy of the title deed of the property/s on which the unlawful listed activity/ies has commenced must be attached to the application.

Municipality in whose area of jurisdiction the activity falls:	Hessequa Municipality		
Contact person, if known:	S. Carelse (Environmental Department)		
Postal address:	PO Box 29,		
	Riversdale,	Postal code:	6670
Telephone	028 713 8000	Cell:	
E-mail:	Shagon Carelse <shagon@hessequa.gov.za>	Fax:	()

Please note:

In instances where there is more than one Municipality involved, please attach a list of Municipalities with their respective contact details to the form.

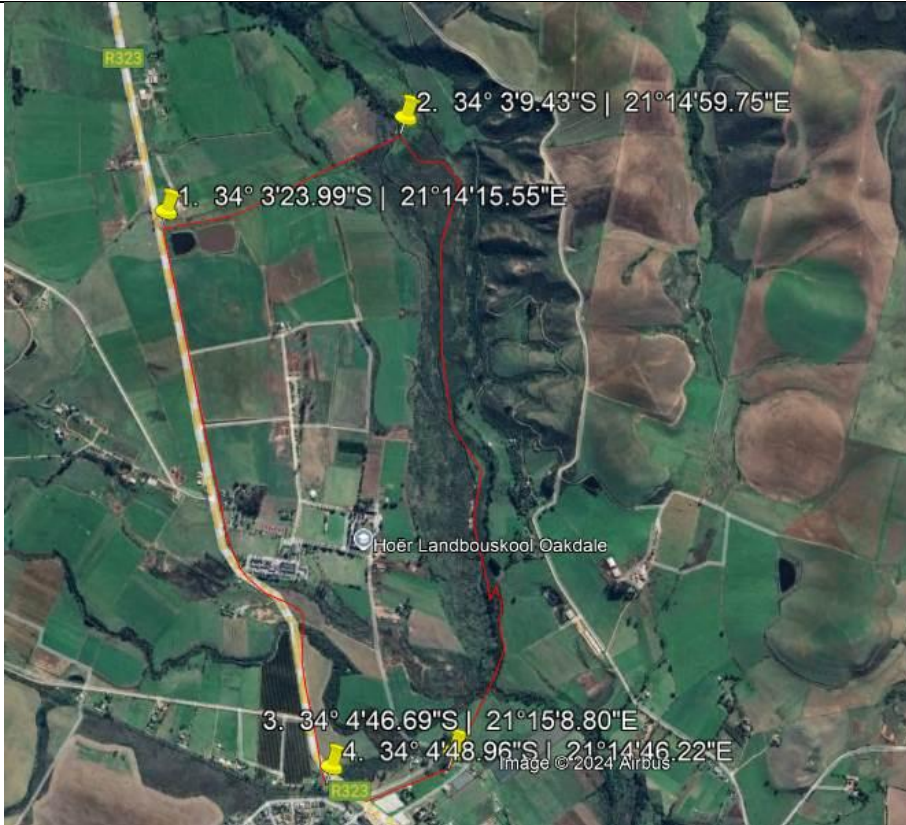
Property location(s):	Erf 42, Riversdale – Oakdale Agricultural High School located approximately 3.5km from central Riversdale. Access is obtained from R323																	
Farm/Erf name(s) & number(s) including portion(s)	Erf 42																	
Property size(s) (m ²)	3141648.4m²																	
Development footprint size(s) (m ²)	<table border="1"> <thead> <tr> <th>Field name and colour as indicated on the map</th> <th>Approximate area (m²)</th> </tr> </thead> <tbody> <tr> <td>Field 1 (a), blue</td> <td>1202</td> </tr> <tr> <td>Field 1 (b), yellow</td> <td>7559</td> </tr> <tr> <td>Access track, purple</td> <td>277</td> </tr> <tr> <td>Field 2, white</td> <td>21823</td> </tr> <tr> <td>Field 3, black</td> <td>11227</td> </tr> <tr> <td>Field 4, green</td> <td>22756</td> </tr> <tr> <td>Total area cleared (approx)</td> <td>64844</td> </tr> </tbody> </table>		Field name and colour as indicated on the map	Approximate area (m ²)	Field 1 (a), blue	1202	Field 1 (b), yellow	7559	Access track, purple	277	Field 2, white	21823	Field 3, black	11227	Field 4, green	22756	Total area cleared (approx)	64844
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Field 2, white	21823																	
Field 3, black	11227																	
Field 4, green	22756																	
Total area cleared (approx)	64844																	

SG21 Digit code(s)

C06400040000004200000

Property boundary:

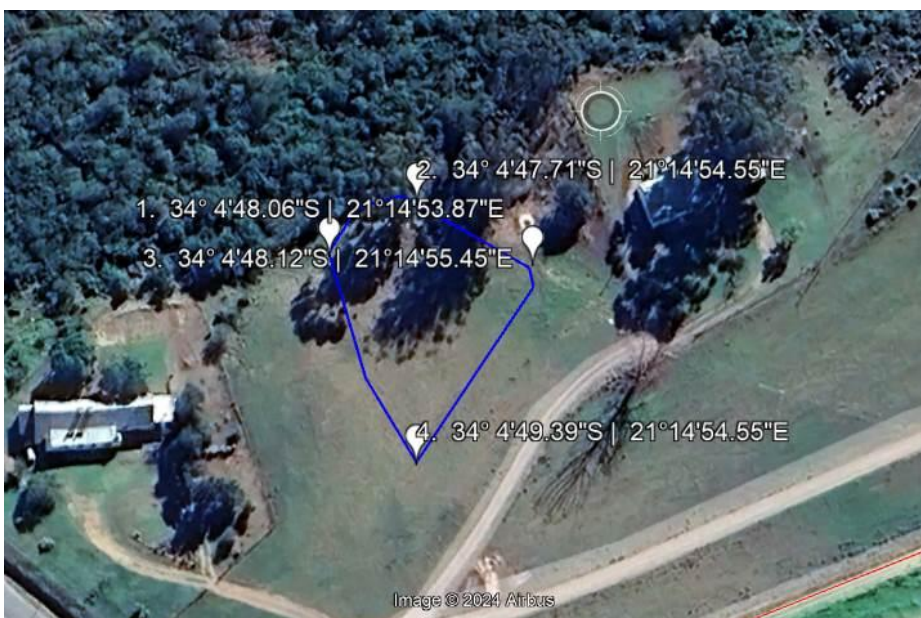
Point	Latitude (S)			Longitude (E)		
1	34°	3'	23.99" South	21°	14'	15.55" East
2	34°	3'	9.43" South	21°	14'	59.75" East
3	34°	4'	46.69" South	21°	15'	8.80" East
4	34°	4'	48.96" South	21°	14'	46.22" East



Erf 42 Cadastral Boundary highlighted in red

The co-ordinates for the site boundary are:

Point	Latitude (S)	Longitude (E)
1	34° 3' 26.75" South	21° 14' 58.72" East
2	34° 3' 28.79" South	21° 15' 2.31" East
3	34° 3' 35.34" South	21° 15' 3.11" East
4	34° 3' 35.58" South	21° 14' 59.32" East



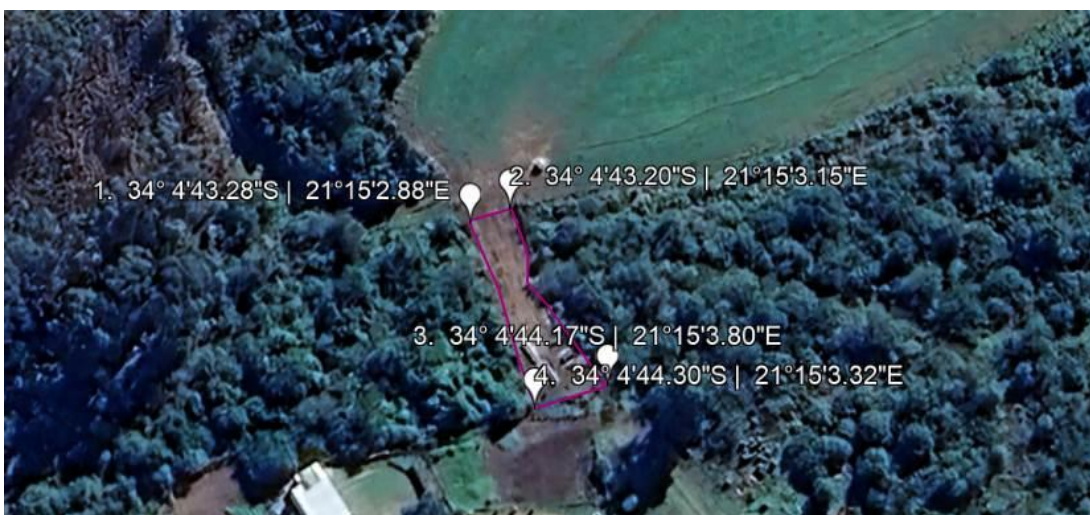
Field 1 (a)

Point	Latitude (S)	Longitude (E)
1	34° 4' 49.09" South	21° 14' 55.68" East
2	34° 4' 45.88" South	21° 15' 1.26" East
3	34° 4' 48.40" South	21° 15' 0.72" East
4	34° 4' 50.39" South	21° 14' 54.71" East



Field 1(b)

Point	Latitude (S)	Longitude (E)
1	34° 4' 43.28" South	21° 15' 2.88" East
2	34° 4' 43.20" South	21° 15' 3.15" East
3	34° 4' 44.17" South	21° 15' 3.80" East
4	34° 4' 44.30" South	21° 15' 3.32" East



Access track for livestock

Point	Latitude (S)	Longitude (E)
1	34° 4' 19.01" South	21° 14' 35.45" East
2	34° 4' 21.41" South	21° 14' 44.70" East
3	34° 4' 25.26" South	21° 14' 45.23" East

4	34° 4' 23.32" South	21° 14' 14.40" East
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**Field 2**

Point	Latitude (S)	Longitude (E)
1	34° 3' 35.55" South	21° 14' 35.4" East
2	34° 3' 34.84" South	21° 14' 39.40" East
3	34° 3' 38.02" South	21° 14' 41.31" East
4	34° 3' 38.43" South	21° 14' 36.16" East

**Field 3**

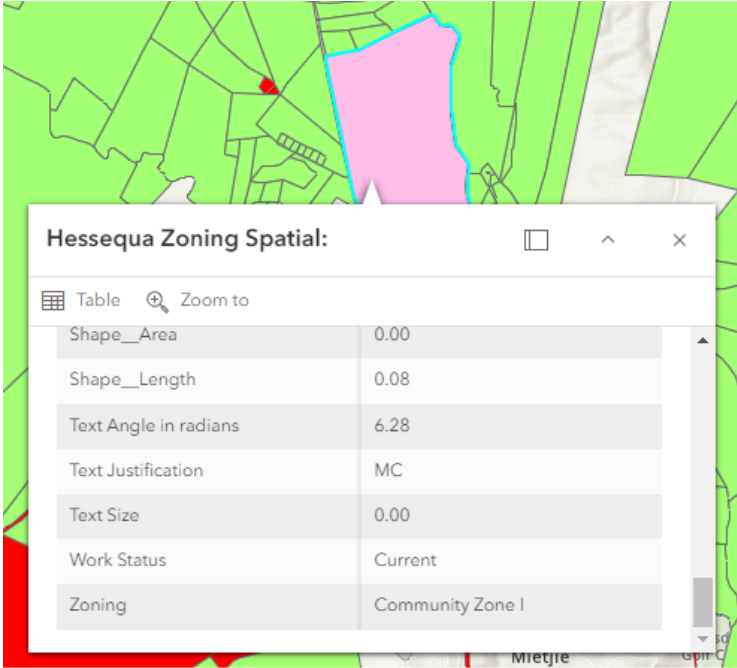
Point	Latitude (S)	Longitude (E)
1	34° 4' 48.06" South	21° 14' 53.87" East
2	34° 4' 47.71" South	21° 14' 54.55" East
3	34° 4' 48.12" South	21° 14' 55.45" East
4	34° 4' 49.39" South	21° 14' 54.55" East



Field 4

Please note:

Where numerous properties/sites are involved (e.g. linear activities), attach a list of property descriptions and street addresses to the consultation form.

Street address:	Hoër Landbouskool Oakdale R323, Riversdale Settlement, Riversdale																		
Magisterial District or Town:	Riversdale Hessequa Municipality																		
Closest City/Town:	Riversdale	Distance	3.5(km)																
Zoning of Property:	Community Zone I (School) <table><thead><tr><th colspan="2">Hessequa Zoning Spatial:</th></tr></thead><tbody><tr><td>Shape_Area</td><td>0.00</td></tr><tr><td>Shape_Length</td><td>0.08</td></tr><tr><td>Text Angle in radians</td><td>6.28</td></tr><tr><td>Text Justification</td><td>MC</td></tr><tr><td>Text Size</td><td>0.00</td></tr><tr><td>Work Status</td><td>Current</td></tr><tr><td>Zoning</td><td>Community Zone I</td></tr></tbody></table>			Hessequa Zoning Spatial:		Shape_Area	0.00	Shape_Length	0.08	Text Angle in radians	6.28	Text Justification	MC	Text Size	0.00	Work Status	Current	Zoning	Community Zone I
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Text Size	0.00																		
Work Status	Current																		
Zoning	Community Zone I																		

Please note:

In instances where there is more than one zoning applicable, please attach a list or map of the properties indicating their respective zoning to the Application Form.

Was the property rezoned after commencement of activities?		YES	NO
If yes, what was the previous zoning?			
No rezoning done or required; the fields form part of the operation of the agricultural school			
Is a rezoning application required?		YES	NO
Is a consent use application required?		YES	NO
Locality map:	A locality map must be attached to the Application Form as an appendix. The scale of the locality map must be at least 1:50 000. For linear activities of more than 25 kilometres, a smaller scale e.g. 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; • the prevailing wind direction; and • GPS co-ordinates (Indicate the position of the proposed activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates should be in degrees and decimal minutes. The minutes should have at least three decimals to ensure adequate accuracy. The projection that must be used in all cases is the WGS-84 spheroid in a national or local projection)		
Landowner(s) Consent: N/A	If the applicant is not the owner or person in control of the land on which the activity has been undertaken, he/she must obtain written consent from all landowners or persons in control of the land (of the site and all alternative sites). This must be attached to this document as Appendix G. Such consent must indicate whether or not the owner or person in control of the land would support approval of the application and that the land need not be rehabilitated. Note: The consent of the landowner or person in control of the land is not required for: a) linear activities; b) an activity directly related to prospecting or exploration of a mineral and petroleum resource or extraction and primary processing of a mineral resource; or c) strategic integrated projects ("SIPs") as contemplated in the <i>Infrastructure Development Act, 2014 (Act No. 23 of 2014)</i>.		

2. APPLICATION HISTORY

(Cross out the appropriate box "X" and provide a description where required).

Has any national, provincial or local authority considered any development applications on the property previously?	Yes	No
If so, please give a brief description of the type and/or nature of the application/s as well as a reference number, if applicable: (In instances where there was more than one application, please attach a list of these applications)		
N/A – existing historic school		
Which authority considered the application:		
N/A		
Has <u>any</u> one of the previous application/s on the property been approved or refused? If so provide a list of the successful and unsuccessful application/s and the reasons for decision(s).	Yes	No
N/A		
Provide detail on the period of validity of decision and expiry dates of the above applications/ permits etc.		
N/A		

SECTION B: ACTIVITY INFORMATION

1. ACTIVITIES APPLIED FOR

I hereby apply in terms of section 24G of the National Environmental Management Act (Act 107 of 1998) for the regularisation of the unlawful commencement or continuation of the listed or waste management activities as specified in Section B:1 below.

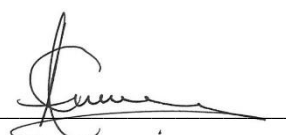
Applicant (Full names): Hoër Landbou Skool Oakdale

Signature: 

Place: Riversdale

Date: 17 March 2026

EAP (Full names): Cathy Avierinos

Signature: 

Place: George

Date: 17 March 2026

All listed activities associated with the development must be indicated below.

1.1 Applicable EIA listed activities

ECA EIA Contraventions: between 08 September 1997 and end of 09 May 2002			
Activities commenced with on or after 08 September 1997 and before end 09 May 2002: EIA regulations promulgated in terms of the ECA, Act 73 of 1989			
Government Notice No. ("GN") R1182 Activity No(s):	Describe the relevant listed activity/ies in writing as per GN No. 1182 of 1997	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
None			
ECA EIA Contraventions: between 10 May 2002 and end of 02 July 2006			
Activities unlawfully commenced with on or after 10 May 2002 and before end 02 July 2006: EIA regulations promulgated in terms of the ECA, Act 73 of 1989,			
None			
NEMA EIA Contraventions: between 03 July 2006 and end of 01 August 2010			
Activities unlawfully commenced with on or after 03 July 2006 and before end 01 August 2010: EIA regulations promulgated in terms of the NEMA			
GN R386 Activity No(s): (Listing Notice 1 of 2006)	Describe the relevant listed activity/ies in writing as per GN No. R. 386 of 2006 ("NEMA 2006 Basic Assessment listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
None			
Government Notice No. R387 Activity No(s): (Listing Notice 2 of 2006)	Describe the relevant listed activity/ies in writing as per GN No. R. 387 of 2006 ("NEMA 2006 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
None			
NEMA EIA Contraventions: between 02 August 2010 and end of 07 December 2014			
Activities unlawfully commenced with on or after 02 August 2010 and before end 07 December 2014: EIA regulations promulgated in terms of the NEMA, Act 107 of 1998,			
GN No. R. 544 Activity No(s): (Listing Notice 1 of 2010)	Describe the relevant listed activity(ies) in writing as per GN No. R. 544 of 2010 ("NEMA 2010 Basic Assessment listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
None			
GN No. R. 545 Activity No(s): (Listing Notice 2 of 2010)	Describe the relevant listed activity/ies in writing as per GN No. R. 545 of 2010. (NEMA 2010 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
None			
GN No. R. 546 Activity No(s): (Listing Notice 3 of 2010)	Describe the relevant listed Activity(ies) in writing as per GN No. R. 546 of 2010	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
NEMA EIA Contraventions: on or after 08 December 2014			
Activities unlawfully commenced with on or after 08 December 2014: EIA regulations promulgated in terms of the NEMA, Act 107 of 1998,			
GN No. R. 327 Activity No(s): (Listing Notice 1 of 2014)	Describe the relevant listed activity(ies) in writing as per GN No. R.327 of 2014 ("NEMA 2014 Basic Assessment listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity

27.	The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for— (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.	Clearance of indigenous vegetation to create new cultivated lands	See table provided below this section
GN No. R. 325 Activity No(s): (Listing Notice 2 of 2014)	Describe the relevant listed activity(ies) in writing as per GN No. R.325 of 2014 ("NEMA 2014 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
None			
GN No. R. 324 Activity No(s): (Listing Notice 3 of 2014)	Describe the relevant listed activity(ies) in writing as per GN No. R.324 of 2014	Describe the portion of the development as per the project description that relates to the applicable listed activity.	State the date of commencement of each activity
12	The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;	Clearance of indigenous vegetation mapped as endangered Eastern Ruens Shale Renosterveld / Cape Lowland Alluvial Vegetation to create new cultivated lands	See table provided below this section

Please ensure that you have provided the similarly listed activities if the listed activities were commenced before the period the EIA Regulations came into effect, i.e. before 08 December 2014.

1.2 Applicable Waste Management Activities

List the relevant waste management activity/ies applied for:

Waste Management Activity Contraventions: On or after 03 July 2007 up to end of 28 November 2013			
Activities unlawfully commenced with in terms of GNR 718 of 03 July 2009 under the National Environmental Management Waste Act, Act 59 of 2008			
GN No. 718 – Category A Activity No(s):	Describe the relevant <u>Category A</u> waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity
None			
GN No. 718 – Category B Activity No(s):	Describe the relevant <u>Category B</u> waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity
None			

Waste Management Activity Contraventions: On or after 29 November 2013			
Activities unlawfully commenced with in terms of GNR 921 of 29 November 2013 under the National Environmental Management Waste Act, Act 59 of 2008,			
GN No. 921 - Category A Activity No(s):	Describe the relevant <u>Category A</u> waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity
None			
GN No. 921 – Category B Activity No(s):	Describe the relevant <u>Category B</u> waste management activity/ies in writing.	Describe the portion of the development as per the project description that relates to the applicable waste activity.	State the date of commencement of each activity
None			

Please note:

The National Department of Environmental Affairs is the competent authority for activities regarded as hazardous waste. Such activities must be indicated as hazardous waste in the abovementioned lists.

Only those activities listed above shall be considered for authorisation. The onus is on the applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, an application for amendment or a new application for Environmental Authorisation will have to be submitted.

1.3 Activities listed similarly in terms of the EIA Regulations

Kindly indicate the listed activities in terms of the EIA Regulations that is listed similar to the unlawfully commenced activities. The descriptions provided below must clearly state why the activity/development is still similarly listed in terms of the EIA Regulations, 2014.

The similarly listed activities in terms of the EIA Regulations promulgated in terms of the NEMA, Act 107 of 1998,		
GN No. R. 327 Activity No(s): (Listing Notice 1 of 2014)	Describe the relevant listed activity(ies) in writing as per GN No. R.327 of 2014 ("NEMA 2014 Basic Assessment listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.
27	The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation , except where such clearance of indigenous vegetation is required for— (iii) the undertaking of a linear activity; or (iv) maintenance purposes undertaken in accordance with a maintenance management plan.	Not Applicable – Clearance of indigenous vegetation to create new cultivated lands – sites 2, 3 and 4 were all historically cultivated areas, used continually for grazing or timber production and not supporting natural indigenous vegetation. Site 1 supported indigenous vegetation but is less than 1ha.
GN No. R. 325 Activity No(s): (Listing Notice 2 of 2014)	Describe the relevant listed activity(ies) in writing as per GN No. R.325 of 2014 ("NEMA 2014 Scoping/EIA listed activity/ies")	Describe the portion of the development as per the project description that relates to the applicable listed activity.
None		
GN No. R. 324 Activity No(s): (Listing Notice 3 of 2014)	Describe the relevant listed activity(ies) in writing as per GN No. R.324 of 2014	Describe the portion of the development as per the project description that relates to the applicable listed activity.
12	The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape ii. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;	Clearance of indigenous vegetation mapped as endangered Eastern Ruens Shale Renosterveld (not lawfully cultivated in the preceding 10 years) to create new cultivated lands Only site 1 is confirmed to have supported disturbed Shale Renosterveld at the time that they were cultivated. Sites 2 and 4 may historically have supported Cape Lowland Alluvial vegetation prior to historical agricultural transformation.

Please note:

Where approvals for the activity have been obtained in terms of any other legislation (e.g. National Water Act, Act 36 of 1998), certified copies of such approvals must be attached to this form.

Field name and colour as indicated on the map	Approximate area (m2)		Date recently cleared
Field 1(a), blue	1202	Newly cultivated	2017

Field 1(b), yellow	7559	Newly cultivated	2017
Access track, purple	277	Access route for livestock between grazing lands	2017
Field 2, white	21823	Historically cultivated	April 2019-May 2020
Field 3, black	11227	Historically woodlot and cultivated	March 2013- Sep 2013
Field 4, green	22756	Historically cultivated	2014-2016
Total area cleared (approx)	64844 (6.5ha)		

2. ACTIVITY DESCRIPTION

(Cross out the appropriate box "☒" and provide a description where required).

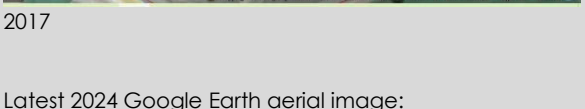
Is/are the activity(ies) complete or is/are the activity(ies) still to be completed?	Completed	Incomplete
(a) Is/was the project a new development or an upgrade of an existing development? Also indicate the date (e.g. 2 August 2010) when the activity commenced <u>as well as</u> the original date of commencement if the application is an upgrade.	New	Upgrade

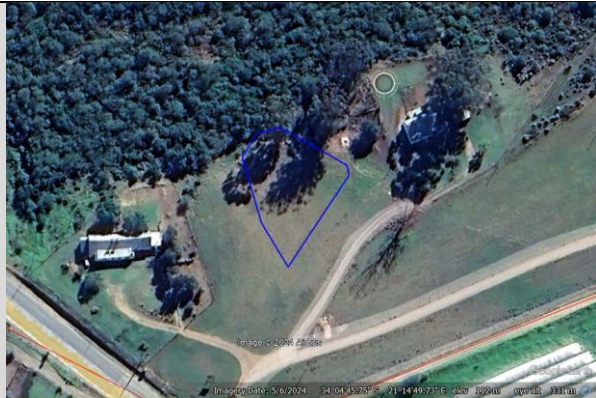
Erf 42 is an operating agricultural school since 1928.

The property consisted of various agricultural fields and operations. Between 2013 and 2020 various areas of historic agriculture were ploughed to improved grazing or change from woodlot to grazing and a new area around the homestead was cultivated. A new stock access route was created to replace a longer existing access route.

With the exception of site 1 - these areas were previously used agricultural lands, or woodlots of gum trees where the trees were cleared, and the area was cultivated for grazing. Ploughing these to improve grazing was, however, done without knowledge that it could be in contravention of NEMA or that an MMP should have been in place for ongoing agricultural management.

The following table provides the lands created and the estimated creation years based on Google Earth aerial imagery:

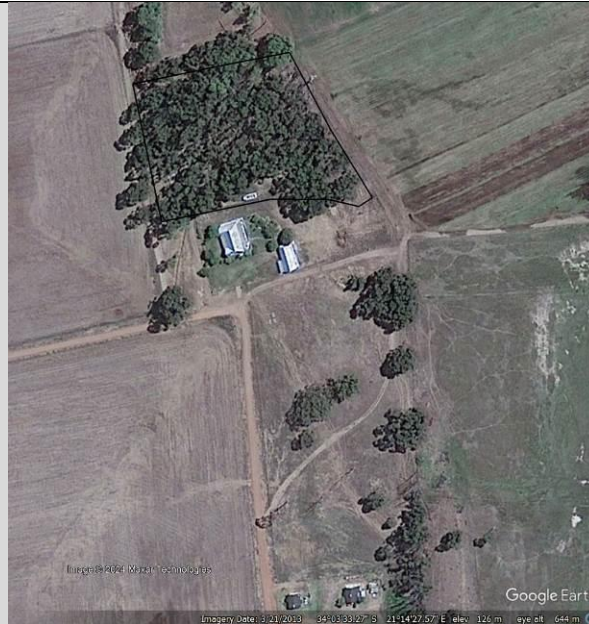
Field name and colour as indicated on the map	Approximate area (m ²)	Estimated creation dates and aerial evidence
Field 1(a), blue	1202	Cleared in 2017  2016  2017 Latest 2024 Google Earth aerial image: 

			
Field 1 (b), yellow	7559	Cleared in 2017  2014  2016  2017 Latest 2024 Google Earth aerial image	

		Crop census 2023	
Access for livestock, purple	277	Cleared in 2017 2016	

		 2017 Latest 2024 Google Earth aerial image:  Historic access track no longer in use, shorter track now in use. The original access route has been rehabilitated.	
Field 2, white	21823	Used historically since 1991 	

		 2019 used for grazing since 1991  2020 ploughed to improve grazing Latest 2024 Google Earth aerial image:   Crop census 2023
Field 3, black	11227	Woodlot harvested between March 2013 and September 2013

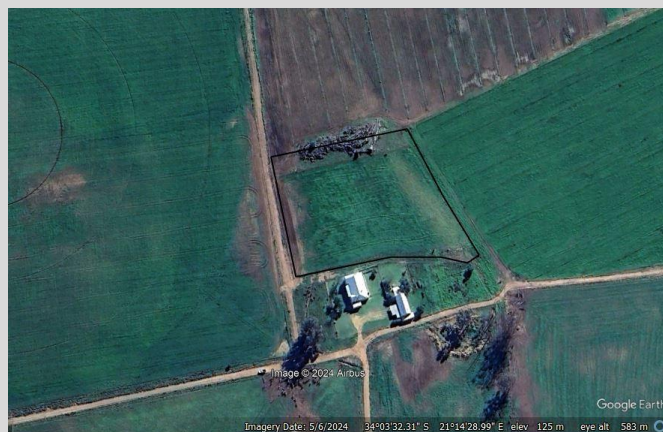


March 2013



September 2013 – showing the woodlot felled and used for grazing

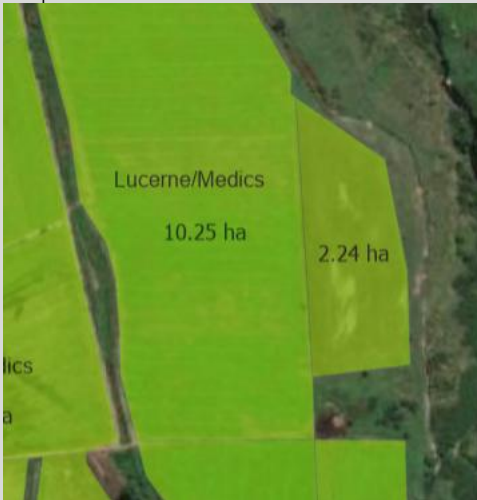
Latest 2024 Google Earth aerial image:



		 Cultivated in 1991 – used for grazing since 1991  2016- used for grazing  Ploughed 2022 Latest 2024 Google Earth aerial image: 
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Field 4, green

22756

		Crop census 2023 
Total area cleared / managed (approx)	64844	

(b) Clearly describe the activity and associated infrastructure commenced with, indicating what has been completed and what still has to be completed.

The activities commenced as part of normal agricultural operations at the school where grazing and cultivated pastures are periodically ploughed and reseeded to improve grazing and crop production.

Site 1 – around the historic homestead – the cultivated area was extended into grazing area that was not previously cultivated and would have been remnant natural vegetation between the grazing area. This was new cultivation and is complete and is seeking rectification in order to remain a cultivated site. The stock access route that was modified replaces the longer historically used access route which has been rehabilitated and is no longer in use. The shorter route is complete and will be retained as part of the s24G.

Site 2 – was historically cultivated since 1991 and has been continually used for grazing. It was ploughed and seeded to improve the grazing. Work is complete and the pasture is in use. It is not necessary for rectification as this was historically cultivated and continually in use for grazing.

Site 3 – was historically a woodlot of gum trees which were harvested in 2013. Used for grazing since 2013 and stumps removed in 2018 to improve the grazing.

Site 4 - was historically cultivated since 1991 and has been continually used for grazing. It was ploughed and seeded to improve the grazing. Work is complete and the pasture is in use. It is not necessary for rectification as this was historically cultivated and continually in use for grazing.

No new associated infrastructure was created as the fields created form part of the existing operational agriculture activities on the property.

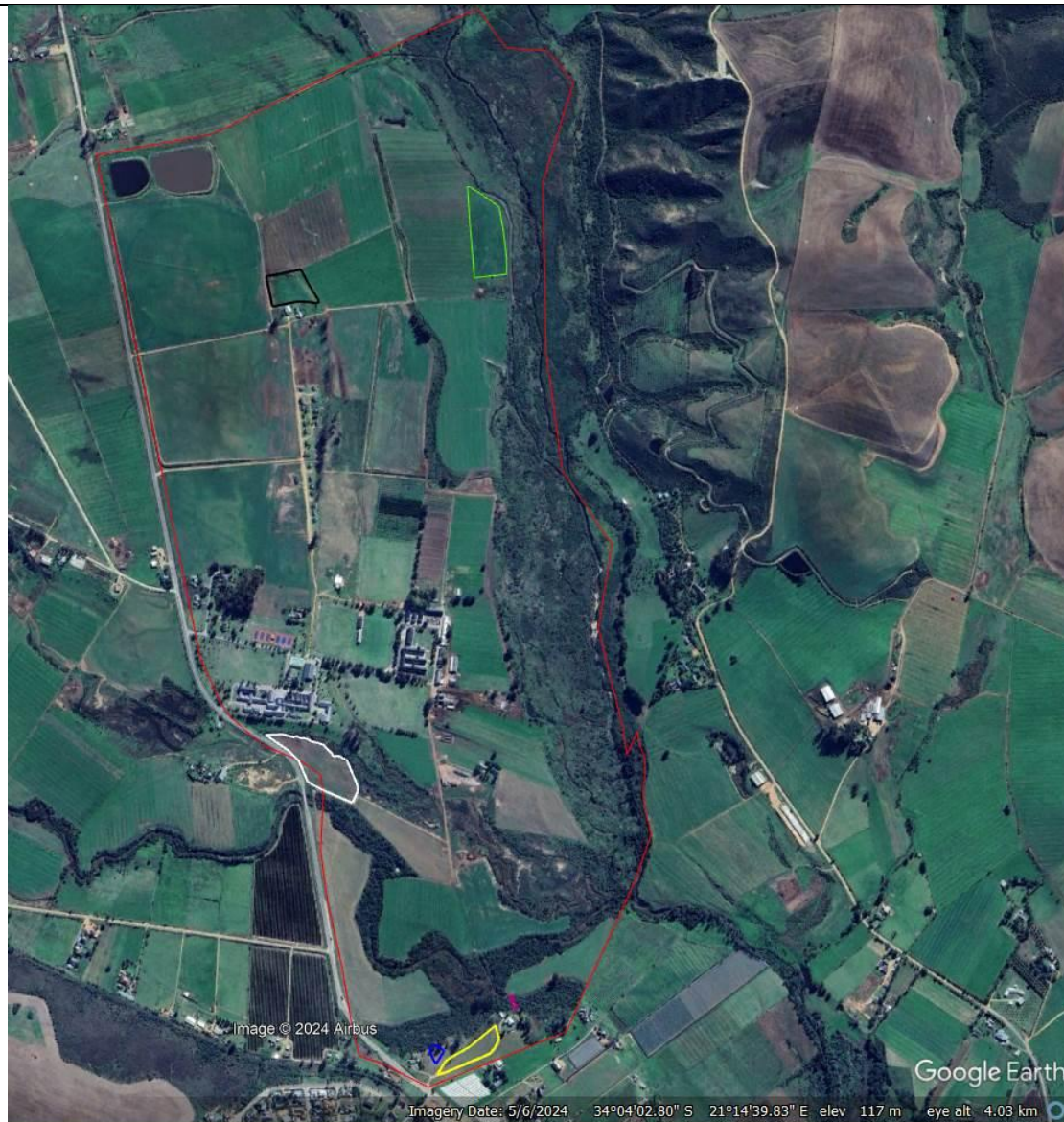


Current crop census for the property in use by the school.

(c) Please provide details of all components of the activity and attach diagrams (e.g. architectural drawings or perspectives, engineering drawings, process flow charts etc.).

Buildings	YES	NO
Provide brief description:		
None		
Infrastructure (e.g. roads, power and water supply/ storage)	YES	NO
Provide brief description:		
None		
Processing activities (e.g. manufacturing, storage, distribution)	YES	NO
Provide brief description:		
None		
Storage facilities for raw materials and products (e.g. volume and substances to be stored)		
Provide brief description	YES	NO
None		
Storage and treatment facilities for solid waste and effluent generated by the project	Yes	No
Provide brief description		
None		

(d) Other activities (e.g. water abstraction activities, crop planting activities)	Yes	No
Provide brief description		



The activities commenced as part of normal agricultural operations at the school where grazing and cultivated pastures are periodically ploughed and reseeded to improve grazing and crop production.

Site 1 – around the historic homestead – the cultivated area was extended into grazing area that was not previously cultivated and would have been remnant natural vegetation between the gazing area. This was new cultivation and is complete and is seeking rectification in order to remain as a cultivated site.



The stock access route that was modified replaces the longer historically used access route which has been rehabilitated and is no longer in use. The shorter route is complete and will be retained as part of the s24G.



Site 2 – was historically cultivated since 1991 and has been continually used for grazing. Was ploughed and seeded to improve the grazing. Work is complete and the pasture is in use. Not necessary for rectification as this was historically cultivated and continually in use for grazing.



Site 3 – was historically a woodlot of gum trees which were harvested in 2013. Used for grazing since 2013 and stumps removed in 2018 to improve the grazing.



Site 4 - was historically cultivated since 1991 and has been continually used for grazing. Was ploughed and seeded to improve the grazing. Work is complete and the pasture is in use. Not necessary for rectification as this was historically cultivated and continually in use for grazing.



No new associated infrastructure was created as the fields created form part of the existing operational agriculture activities on the property.

A section 24G application process is now being followed to rectify and retain the new fields and small access area. Continued use and management of all other agricultural areas is seen as ongoing continued agricultural use which does not require rectification.

Rehabilitation of the channel has been done as per the approved rehabilitation plan.

3. PHYSICAL SIZE OF THE ACTIVITY

Indicate the physical spatial size of the activity as well as associated infrastructure (footprints):	See table below	m ²
Indicate the area that has been transformed / cleared to allow for the activity as well as associated infrastructure	See table below	m ²
Total area:	See table below	m ²

Field name and colour as indicated on the map	Approximate area (m ²)		Date cleared
Field 1(a), blue	1202	New cultivated	2017
Field 1(b), yellow	7559	New cultivated	2017
Access track, purple	277	New Access route for livestock between grazing lands – replaces existing longer route now rehabilitated	2017
Field 2, white	21823	Previously cultivated	April 2019-May 2020
Field 3, black	11227	Previously woodlot and cultivated	March 2013- Sep 2013
Field 4, green	22756	Previously cultivated	2014-2016
Total area cleared (approx)	9038 new cultivation 55 806 existing		

4. SITE ACCESS

Was there an existing access road?	YES	NO
If NO, what was the distance over which the new access road was built? Please indicate the length and width of the new road.	(Length) 36m	(width) 3.5m
Describe the type of access road constructed:		
Existing internal dirt farm tracks are used to access all fields on the farm.		
A new access route (36m) for livestock between grazing camps was created at site 1 which replaces the longer (136m) existing track for livestock with a shorter more direct route. The old route has been rehabilitated (see white line and green line below).		
		
		
Narrow access track to move livestock from the one pasture to the others.		

Please Note:

Indicate the position of the access road on the site plan (See Section 5 below)

5. SITE PHOTOGRAPHS

Colour photographs of the site and its surroundings (taken of the site and from the site), both before (if available) and after the activity commenced, with a description of each photograph, must be attached to this application. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide past and recent aerial photographs. It should be supplemented with additional photographs of relevant features on the site. Date and source of photographs must be included. Photographs must be attached as an **appendix** to this form.

Please note:

Should the relevant photographs not be included in the application, the application may be deemed insufficient and further information in this regard will be requested.

6. APPLICABLE LEGISLATION, POLICIES AND/OR GUIDELINES

Please list all legislation, policies and/or guidelines that were or are relevant to this activity.

LEGISLATION	ADMINISTERING AUTHORITY	TYPE Permit/ license/ authorisation/comment	DATE (if already obtained):
NEMA and NEMA EIA Regulations	DEADP	EA	This report forms part of the application process for rectification
CARA	Department of Agriculture	CARA Permit for new fields over 1ha	<u>Not required</u> as the new area is not in excess of 1 ha. All other areas are historically agriculturally used areas.

POLICY/ GUIDELINES	ADMINISTERING AUTHORITY
Circular EADP 0028/2014: One Environmental Management System	DEADP
DEA&DP (2013) Guideline on Public Participation (EIA Guideline and Information Document Series): Western Cape DEA&DP, March 2013	
DEA&DP (2013) Guideline on Need and Desirability (EIA Guideline and Information Document Series): Western Cape DEA&DP, March 2013	
DEA&DP (2005) Guideline on Environmental Management Plans	
Guideline for determining the scope of specialist involvement in EIA processes, guideline for the review of specialist input in the EIA process and guideline for involving biodiversity specialist in the EIA process (June, 2005)	
Guideline for review of specialist input in the EIA process (June 2005)	
Integrated Environmental Management Information Series 5: Impact Significance (2002)	
Integrated Environmental Management Information Series 7: Cumulative Effects (2004)	
Department of Environmental Affairs Screening Tool and protocols	
National Environmental Management Act, 1998 (Act No 107 of 1998): Procedures to be followed for the assessment and minimum criteria for reporting of identified environmental themes in terms of Section 24(5)(a) and (h) of the National Environmental Management Act, 1998, when applying for environmental authorisation.	
Guideline on generic terms of Reference for EAPs and Project Schedules (March 2013)	
Department of Environmental Affairs Screening Tool and protocols	

7. APPLICATIONS IN TERMS OF NEMA AND SPECIFIC ENVIRONMENTAL MANAGEMENT ACTS ("SEMA's")

If not specifically applied for in terms of this application, does the development require an application for a waste management license in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)?	YES	NO
If yes, has an application been submitted to the licensing authority?	YES	NO
Does the proposed project require an application for a water use license in terms of the National Water Act, 1998 (Act No. 36 of 1998)?	YES	NO
If yes, has an application been submitted to the licensing authority?	YES	NO
If no, please provide evidence of existing water use rights (if applicable) with this application form.	SEE ATTACHED	
Does the proposed project require an application for an atmospheric emissions license in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)?	YES	NO
If yes, has an application been submitted to the licensing authority?	YES	NO
Does the proposed project require an application in terms of the National Environmental Management: Integrated Coastal Management Act ("NEM: ICMA")?	YES	NO
If yes, has an application been submitted to the relevant competent authority?	YES	NO
If yes, provide more details of the application submitted/to be submitted in terms of the NEM: ICMA		
N/A – PROPERTY NOT CLOSE TO COAST		

8. APPLICATIONS IN TERMS OF OTHER LEGISLATION

Is any permission, licence or other approval required in terms of any other legislation? (Please tick)	YES	NO
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If yes, please complete the table below:

Type of approval required (List the applicable legislation & approval required):	Name of the authority responsible for administering the applicable legislation	Application submitted (Yes / No)	Status of application (e.g. pending/ granted/ refused)
N/A			

SECTION C: DESCRIPTION OF RECEIVING ENVIRONMENT**Site/Area Description**

For linear activities (pipelines, etc.) as well as activities that cover very large sites, it may be necessary to complete copies of this section for each part of the site that has a significantly different environment. In such cases please complete copies of Section C and indicate the area which is covered by each copy No. on the site plan.

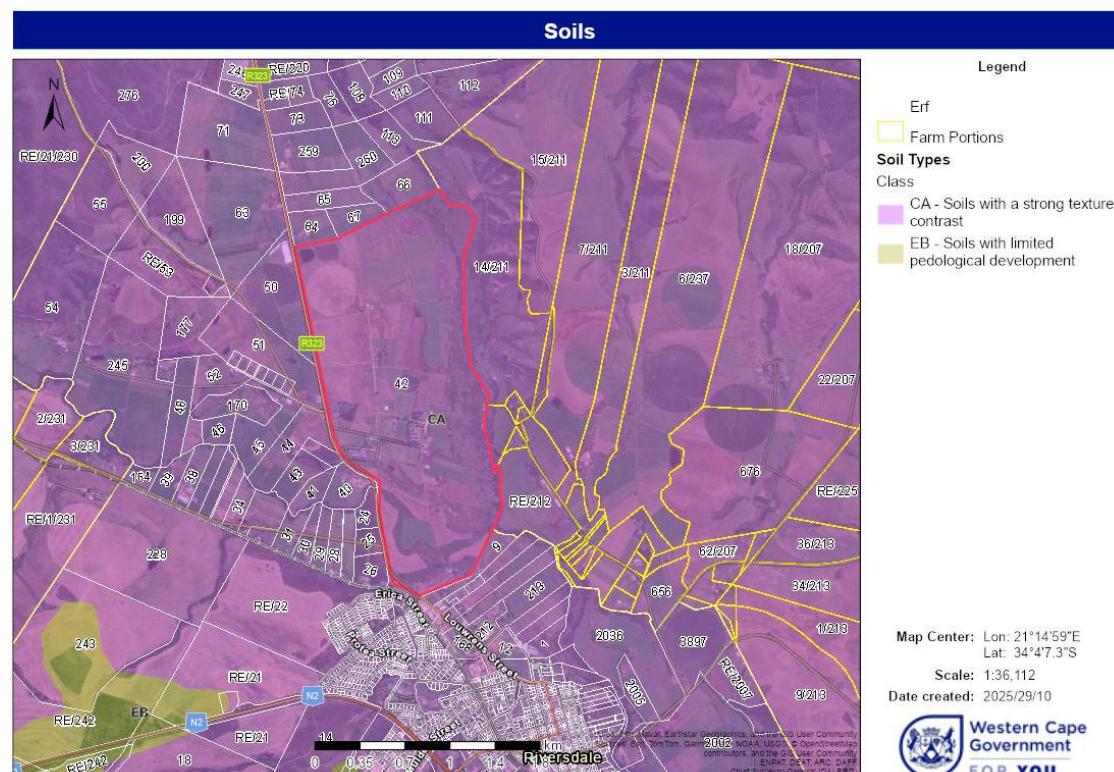
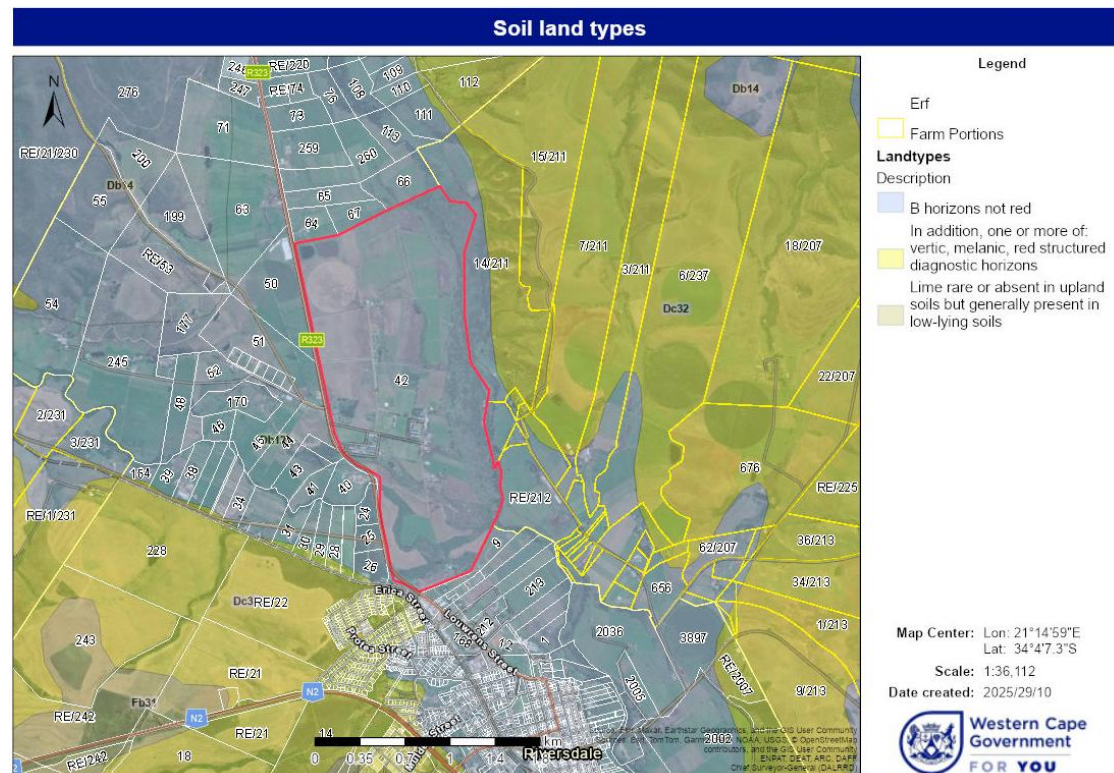
Section C Copy No. (e.g. 1, 2, or 3): 1**1. THE GEOLOGICAL FORMATIONS UNDERLYING THE SITE (Tick the appropriate box)**

GRANITE		QUARTZITE	
SHALE		DOLOMITE	
SANDSTONE	x	DOLERITE	
OTHER (specify)	X, see below		

ENPAT data available on CapeFarmMapper, the soil type and geology are classified as follow:

Broad Soils Classification (ENPAT)

Soil Type:	Prismcutanic and/or pedocutanic diagnostic horizons dominant, B horizons mainly not red
Geology:	Conglomerate, sandstone and mudstone of the Uitenhage Group and alluvium.



As confirmed by specialist, Gert Malan (Agriculture):

“4.1. SOIL POTENTIAL

Soils of the study area was evaluated by using the Land Type memoirs.

Soils of the area are dominated by duplex soils, which are known for their high dryland grazing potential (Table 4.1).

Table 4.1: Land Type Db12. By F. Ellis, BHA Schloms and B Stehr.(Full Land Type Memoir in Annex):

Land Type	Soil Type	Percentage of total area	Estimated Rooting Depth (mm)
Db12	Kroonstad	11.7%	500-700
	Oakleaf	17.6%	>1200
	Valsrivier	8.5%	400-500
	Sterkspruit	18.6%	400-500
	Dundee	6.8%	1000-1100
	Estcourt	6.7%	300-450
	Fernwood	0.8%	>1200

Duplex soils can be characterized by two distinctly different structures and textured layers. Lighter texture (sandy) horizon on top of a heavy texture (clay) horizon gives way to duplex properties. Due to the underlying material, duplex soils drain poorly. This feature makes the soils excellent for in-field rainwater harvesting (IRWH). Sloped areas can drain horizontally out of the field, getting rid of excess water and salts.

Soil forms such as Oakleaf, Fernwood and Dundee has the potential to be used for horticultural crops with supplementary irrigation. Permanent crops that is traditionally grown in Riversdale area include citrus, avocados and almonds.

4.2. SOIL AND TERRAIN EVALUATION

The soils are evaluated for dryland crop production such as planted pastures. The soils are highly suited for dryland winter and summer crop production, including planted pastures. Given proper soil cultivation, management and irrigation, permanent crops can be established. Permanent crop production will largely be limited to management due to the terrain and soils inability to drain freely.

4.3. CLIMATE EVALUATION

The study area is classified as a BSk on the Köppen-Geiger Climate Zone classification system. These climate zones are Arid, steppe, cold. Together with a mean annual rainfall of 491mm the climate provides high potential for dryland crop production.

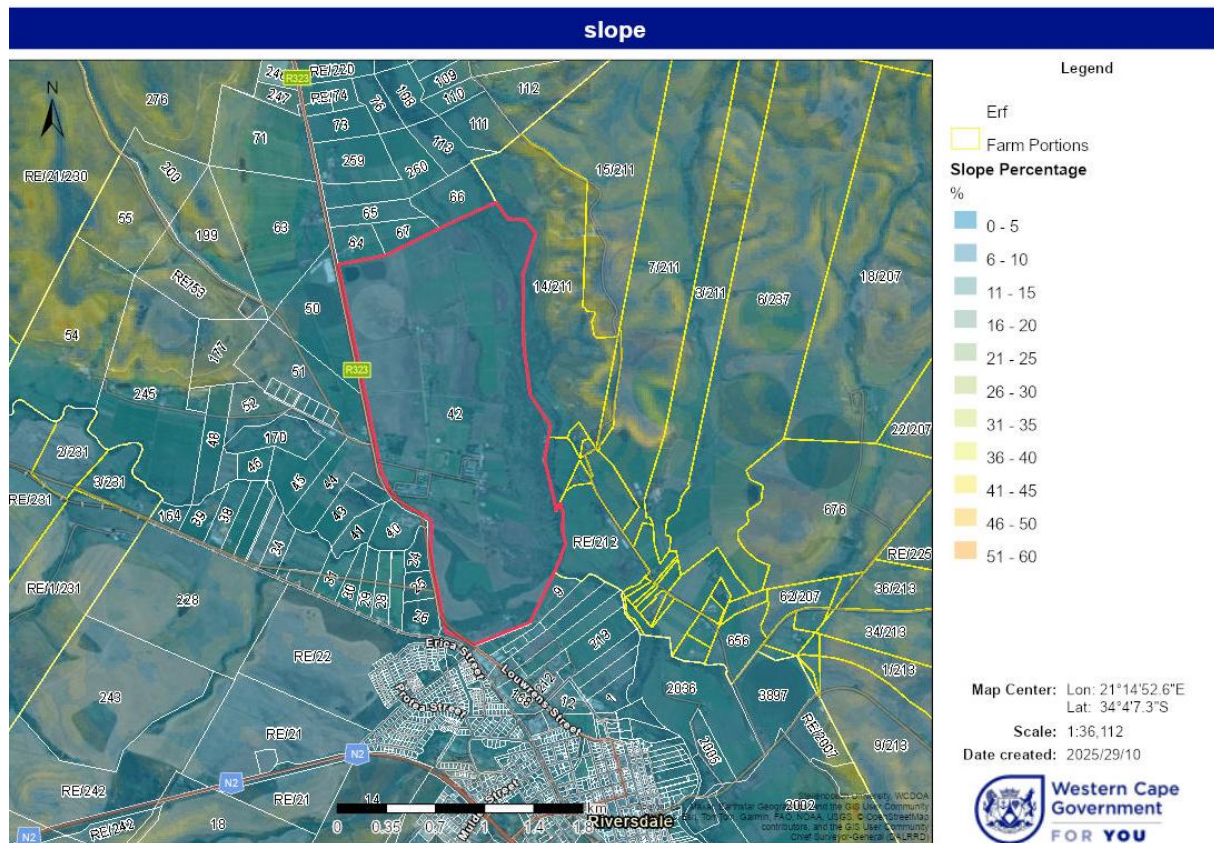
4.4. CONCLUSION

It is hereby confirmed that the soil, terrain and climate is high to very high sensitivity for agriculture. This is also a conformation of the Screening tool assessment of agriculture sensitivity" (Gert Malan, 2025).

2. GRADIENT OF THE SITE

Indicate the general gradient of the site(s) (cross out the appropriate box).

Flat	Flatter than 1:10	1:10 – 1:5	Steeper than 1:5
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Map showing slope – entire property is less than 2% slope (CapeFarmMapper, 2024)

3. LOCATION IN LANDSCAPE

Indicate the landform(s) that best describes the site (cross out ("X") the appropriate boxes).

Ridgeline	Plateau	Side slope of hill/mountain	Closed valley	Open valley	Plain	Undulating plain/low hills	Dune	Sea-front	Other
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4. GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE

4.1 GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE (PRE-COMMENCEMENT)

Is the site(s) located on or near any of the following (cross out ("X") the appropriate boxes)?

Shallow water table (less than 1.5m deep)	YES	NO	UNSURE
Seasonally wet soils (often close to water bodies)	YES	NO	UNSURE
Unstable rocky slopes or steep slopes with loose soil	YES	NO	UNSURE
Dispersive soils (soils that dissolve in water)	YES	NO	UNSURE
Soils with high clay content	YES	NO	UNSURE
Any other unstable soil or geological feature	YES	NO	UNSURE
An area sensitive to erosion	YES	NO	UNSURE

4.2 GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE (POST-COMMENCEMENT)

Shallow water table (less than 1.5m deep)	YES	NO	UNSURE
Seasonally wet soils (often close to water bodies)	YES	NO	UNSURE
Unstable rocky slopes or steep slopes with loose soil	YES	NO	UNSURE
Dispersive soils (soils that dissolve in water)	YES	NO	UNSURE
Soils with high clay content	YES	NO	UNSURE
Any other unstable soil or geological feature	YES	NO	UNSURE
An area sensitive to erosion	YES	NO	UNSURE

If any of the answers to the above are "YES" or "unsure", specialist input may be requested by the Department. (Information in respect of the above will often be available at the planning sections of local authorities. Where it does not exist, the 1:50 000 scale Regional Geotechnical Maps prepared by Geological Survey may also be used).

5. SURFACE WATER

5.1 SURFACE WATER (PRE-COMMENCEMENT)

Indicate the surface water present on and or adjacent to the site and alternative sites (cross out ("X") the appropriate boxes)?

Perennial River	YES	NO	UNSURE
Non-Perennial River	YES	NO	UNSURE
Permanent Wetland	YES	NO	UNSURE
Seasonal Wetland	YES	NO	UNSURE
Artificial Wetland	YES	NO	UNSURE
Estuarine / Lagoonal wetland	YES	NO	UNSURE

5.2 SURFACE WATER (POST-COMMENCEMENT)

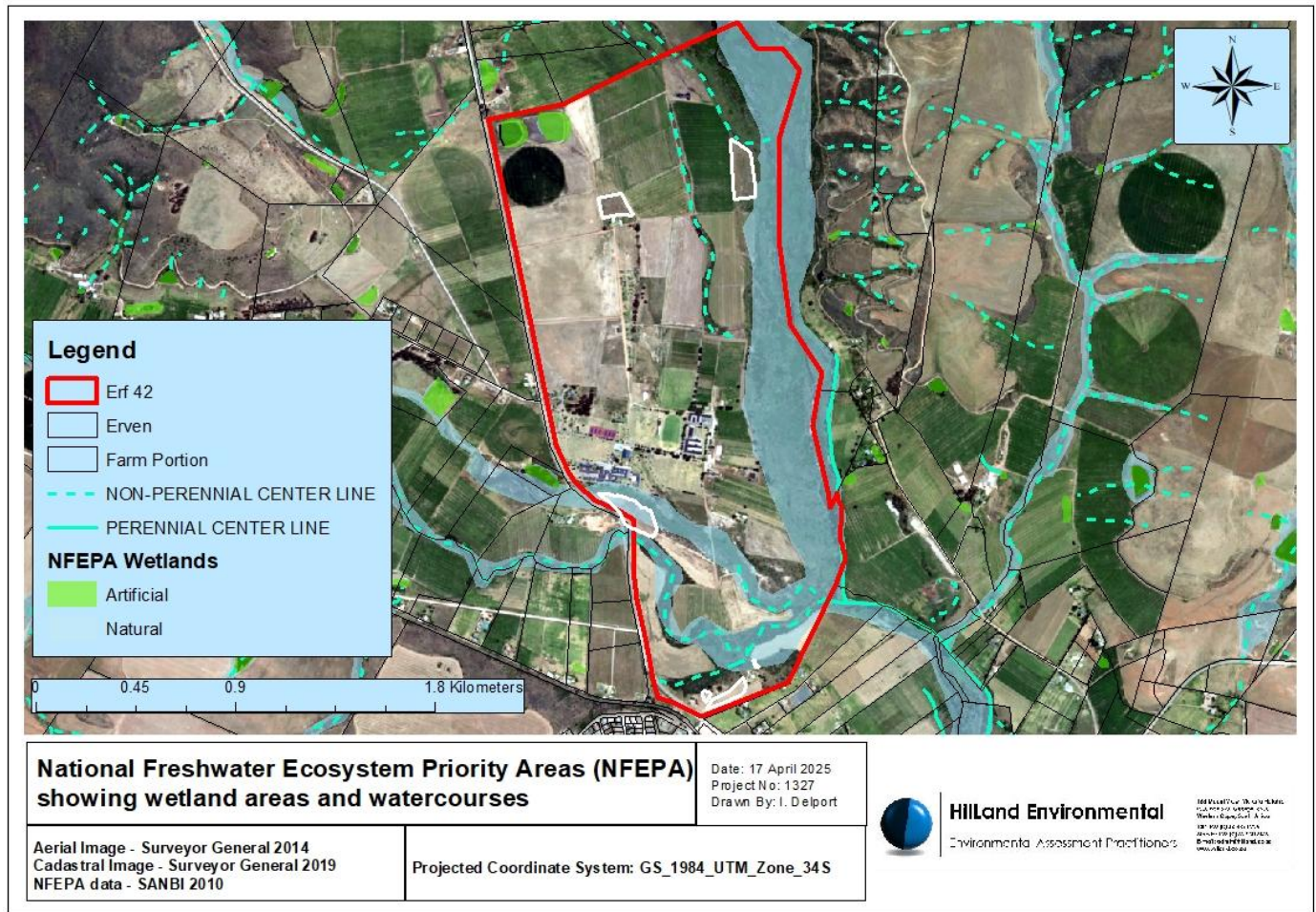
Indicate the surface water present on and or adjacent to the site and alternative sites (cross out ("X") the appropriate boxes)?

Perennial River	YES	NO	UNSURE
Non-Perennial River	YES	NO	UNSURE
Permanent Wetland	YES	NO	UNSURE
Seasonal Wetland	YES	NO	UNSURE
Artificial Wetland	YES	NO	UNSURE
Estuarine / Lagoonal wetland	YES	NO	UNSURE

- The farm dams have been mapped as artificial wetlands
- Non-perennial watercourses are located on the erf and natural wetland areas in the southern portion of the property
- The eastern portion of the property borders a perennial watercourse (Vettrivier) and associated natural wetland area

The agricultural uses have not changed the surface water present on or adjacent to the erf. Nor have they affected any wetlands or watercourses. Cultivation close to the wetland areas was within existing previously cultivated areas.

Based on the comment from CapeNature and BOCMA – the areas that fall within the 1:100 year flood lines should not be cultivated but retained for grazing without ploughing due to the flood risk and potential loss of topsoil. Such areas over the entire farm should be kept well vegetated.



Map showing the NFEPA wetland and watercourses

6. VEGETATION AND/OR GROUNDCOVER

Please note: The Department may request specialist input/studies depending on the nature of the biodiversity occurring on the site and potential impact(s) of the activity/ies. To assist with the identification of the biodiversity occurring on site and the ecosystem status consult <http://bgis.sanbi.org.za> or BGIShelp@sanbi.org.za. Information is also available on compact disc ("cd") from the Biodiversity-GIS Unit, Ph (021) 799 8738. This information may be updated from time to time and it is the applicant/ EAP's responsibility to ensure that the latest version is used. A map of the relevant biodiversity information (including an indication of the habitat conditions as per (b) below) and must be provided as an overlay map to the property/site plan as an **appendix** to this form.

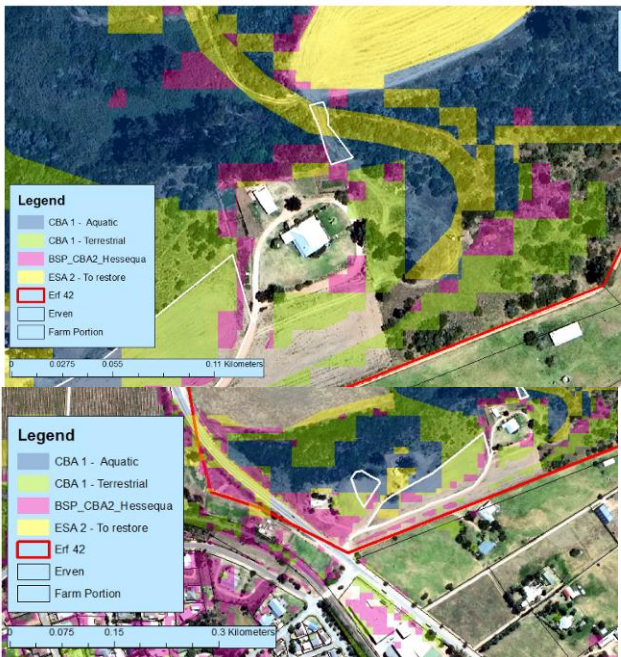
6.1 VEGETATION AND/OR GROUNDCOVER (PRE-COMMENCEMENT)

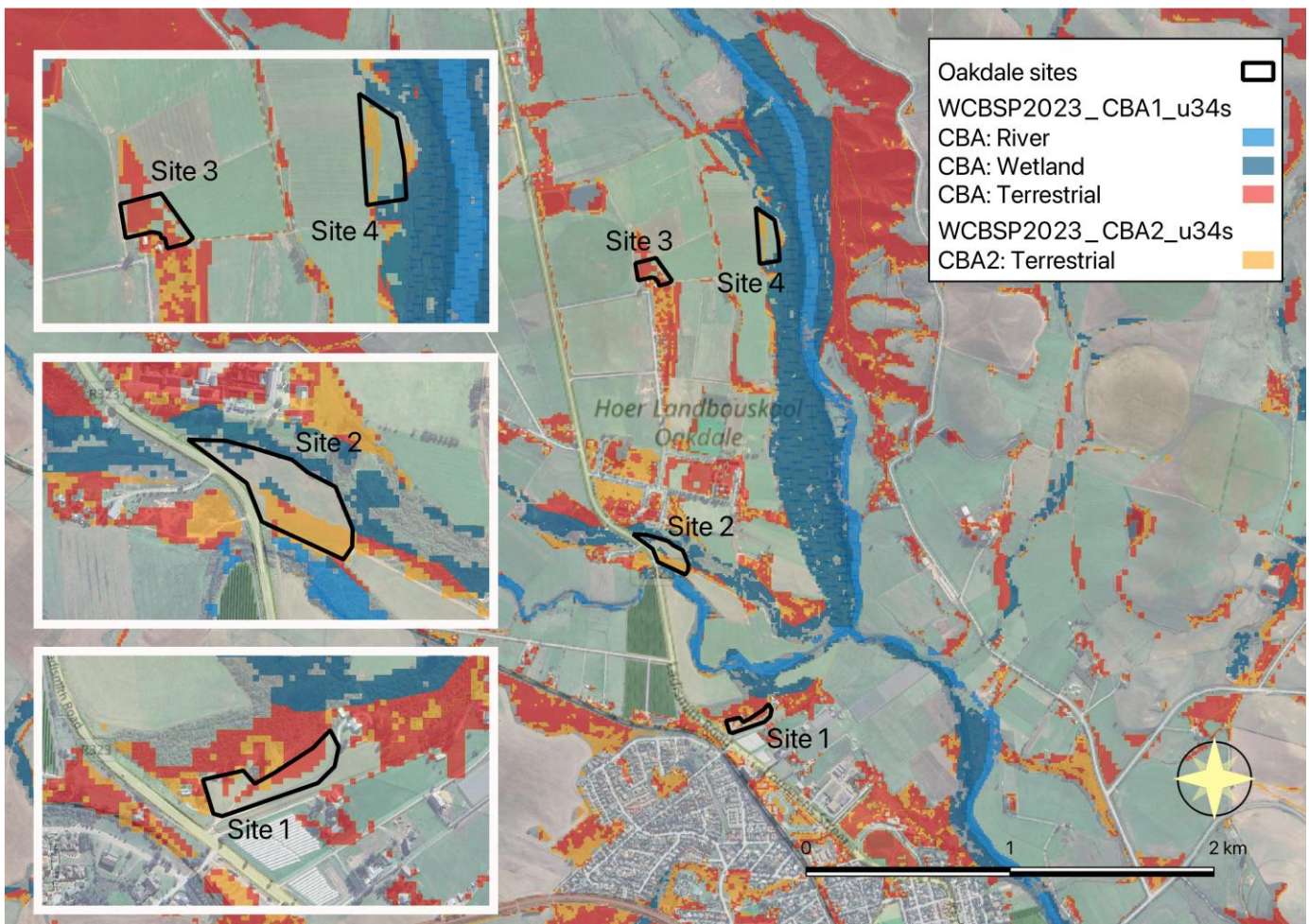
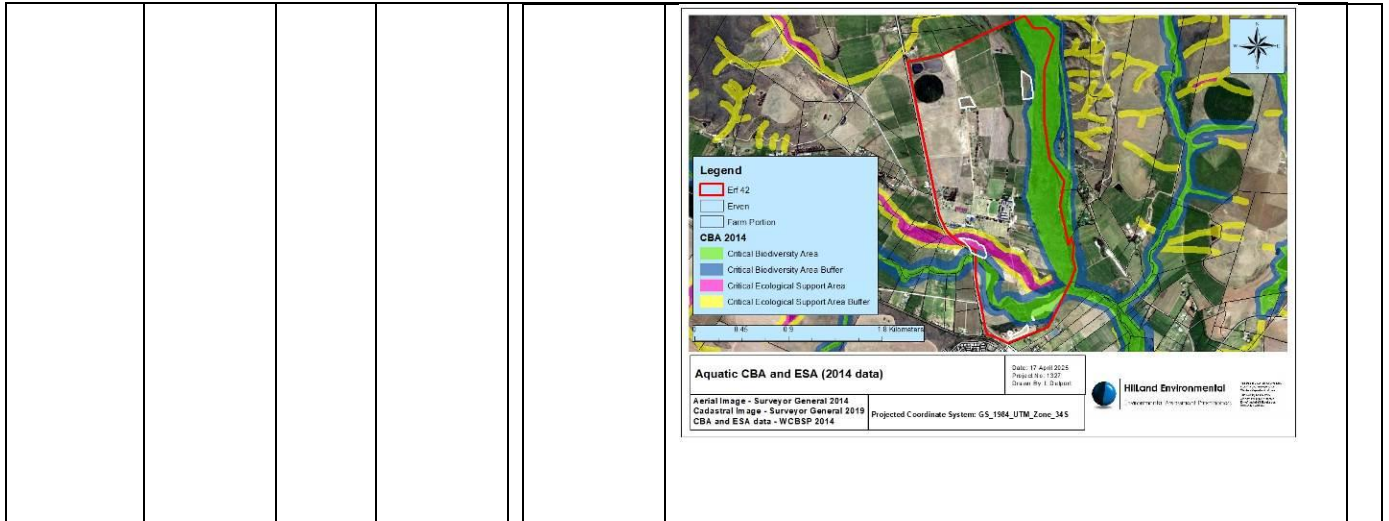
Cross out ("X") the block **and** describe (where applicable) the vegetation types / groundcover present on the site before commencement of the activity.

Indigenous Vegetation - good condition	X Area 1	Indigenous Vegetation with scattered aliens	Indigenous Vegetation with heavy alien infestation
Describe the vegetation type above: See table provided below	Describe the vegetation type above:	Describe the vegetation type above:	Describe the vegetation type above:
Provide ecosystem status for above:	Provide ecosystem status for above:	Provide Ecosystem status for above:	Provide Ecosystem status for above:
Indigenous Vegetation in an ecological corridor or along a soil boundary / interface	Veld dominated by alien species	Distinctive soil conditions (e.g. Sand over shale, quartz patches, limestone, alluvial deposits, termitaria etc.) – describe	
Bare soil	Building or other structure	Sport field	
Other (describe below)	Cultivated land	Paved surface	

Area 3 – gum plantation woodlot converted to pasture	Areas 2 and 4 – historically cultivated areas.	
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- (a) Highlight the applicable pre-commencement biodiversity planning categories of all areas on site and indicate the reason(s) provided in the biodiversity plan for the selection of the specific area as part of the specific category.

Systematic Biodiversity Planning Category				If CBA or ESA, indicate the reason(s) for its selection in biodiversity plan	
Critical Biodiversity Area (CBA)	Ecological Support Area (ESA)	Other Natural Area (ONA)	No Natural Area Remaining (NNR) Field 3	Field 1(a) cleared 2017, 2017 WCBSP data applicable	2017 WCBSP maps the field as forming part of aquatic and terrestrial CBA, degraded CBA and ESA 2 areas to restore.
				Field 1(b) cleared 2017, 2017 WCBSP data applicable	
				Access track cleared 2017, 2017 WCBSP data applicable	2017 WCBSP maps the track as forming part of aquatic CBA and ESA 2 – areas to restore. A very small section has been mapped as degraded CBA 2.
				Field 2 ploughed between 2019 and 2020, 2017 WCBSP data applicable	2017 WCBSP maps the field as forming part of aquatic CBA 1, small portion terrestrial CBA 1, degraded CBA 2 and ESA 2 to restore.
				Field 3 cleared 2013	Not listed (see below)
				Field 4, cleared between 2014 and 2016	2014 WCBSP maps the field as forming part of terrestrial CBA and a small section of an aquatic CBA Buffer Area



WCSBP - 2022 data comparison (BioCensus, 2026)

(b) Highlight and describe the habitat condition on site.

Habitat Condition	Percentage of habitat condition class (adding up to 100%)	Description and additional Comments and Observations (including additional insight into condition, e.g. poor land management practises, presence of quarries, grazing/harvesting regimes etc).
Natural	%	
Near Natural (includes areas with low to moderate level of alien invasive plants)	100%	Field 1 consisted of near natural indigenous vegetation although in a poor state
Degraded (includes areas heavily invaded by alien plants)	%	
Transformed (includes cultivation, dams, urban, plantation, roads, etc)	100%	Field 2 – transformed since 1991 – limited to no remaining natural vegetation Field 3 – consist of alien invasive trees only (<i>Eucalyptus</i>) for more than 70 years (no natural remaining vegetation) Field 4 – transformed since 1991 – limited to no remaining natural vegetation

(c) Complete the table to indicate:

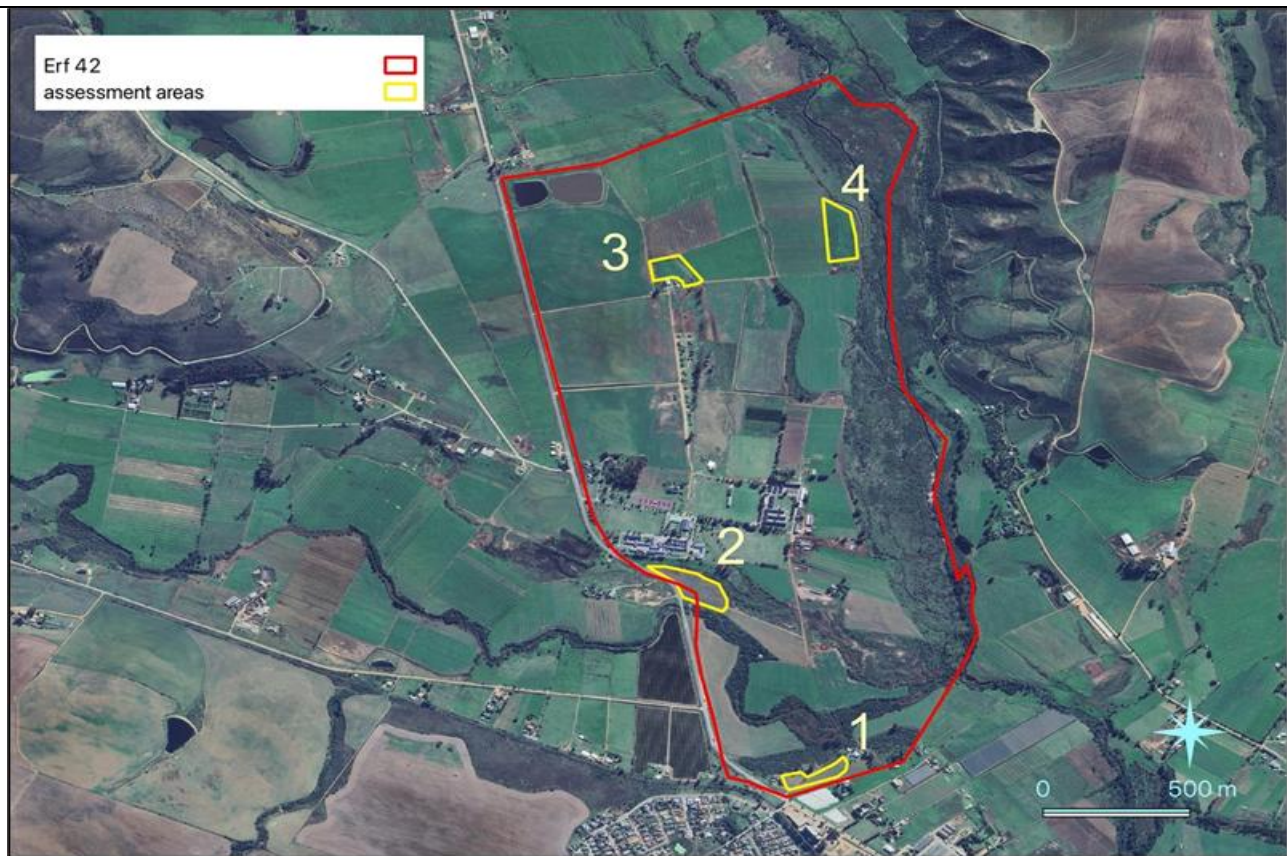
- (i) the type of vegetation, including its ecosystem status, that was previously present on the site; and
(ii) whether an aquatic ecosystem was previously present on site.

Terrestrial Ecosystems		Aquatic Ecosystems							
Ecosystem threat status as per the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)	Critical (Eastern Ruens Shale Renosterveld)	Wetland (including rivers, depressions, channelled and un-channelled wetlands, flats, seeps pans, and artificial wetlands)	Estuary				Coastline		
	Only Site 1 as confirmed by the specialist								
	Endangered								
	Vulnerable								
	Least Threatened								
		YES	NO	UNSURE	YES	NO	YES	NO	

(d) Please provide a description of the vegetation type and/or aquatic ecosystem present on site, including any important biodiversity features/information identified on site (e.g. threatened species and special habitats)

As per the specialist, BioCensus, - Dr D Hoare (2025, see specialist assessment attached):

The following map shows the fields in question and the numbering used by the specialist



Field	Vegetation prior to commencement
1	Cleared area 1 The area is currently cleared and appears to have been ploughed (Figure 4 left). There is therefore very little vegetation, except for an occasional ruderal weed. Historical imagery shows that the cleared area was very similar (has the same spectral and textural aerial photograph signature) to an adjacent area that was not cleared (Figure 4 right). This adjacent area is therefore a good reference site for what was lost within the cleared area. A complete list of plant species found in the adjacent area is as follows: <i>Aloe ferox</i>, <i>Aspalathus alpestris</i>, <i>Asparagus multiflorus</i>, <i>Cotyledon orbiculata</i>, <i>Crassula biplanata</i>, <i>Crassula subulata</i>, <i>Cynodon dactylon</i>, <i>Cyperus eragrostis</i>, <i>Delosperma testaceum</i>, <i>Digitaria eriantha</i>, <i>Eragrostis curvula</i>, <i>Euclea undulata</i>, <i>Euphorbia clandestina</i>, <i>Gymnosporia buxifolia</i>, <i>Oedera genistifolia</i>, <i>Olea europaea</i>, <i>Osteospermum moniliferum</i>, <i>Passiflora caerulea</i>, <i>Polygonum aviculare</i>, <i>Searsia pallens</i>, <i>Searsia rehmanniana</i> and <i>Vachellia karroo</i>. This species list is not definitive but indicates natural vegetation in moderately poor (disturbed) condition. Historical aerial photographs (2012 below) show that an area of about 7000m² was transformed between 2016-2017 that had previously not been cultivated.  

There is a long history of local disturbance associated with the presence of buildings and roads.



Figure 4: Previous status 2016 (top left) and Current status 2024 (top right) of Cleared Area 1. Current status (bottom left) and probable previous status (bottom right) of Cleared Area 1.

The conclusion is that this area was not previously cultivated, but may have been used for occasional grazing and general disturbance associated with a homestead area. The recent clearing activities for cultivation were of vegetation that was in a natural state, but moderately poor condition.

Adjacent to cleared area 1 there is a new stock movement track that has been opened up between two cultivated areas. This new track replaces an existing track with a shorter route and has resulted in the rehabilitation of the longer historic track.

2

Cleared area 2

The area is currently cleared and appears to have been ploughed (Figure 5 left). There is therefore no vegetation. Historical imagery shows that the cleared area would have historically (pre-1985) been similar (has the same spectral and textural aerial photograph signature) to an adjacent area that was not cleared (Figure 5 right). This adjacent area is therefore a good reference site for what would have occurred on site had ongoing cultivation and grazing not taken place.

A complete list of plant species found in the adjacent area is as follows: *Aloe maculata*, *Asparagus africanus*, *Atriplex semibaccata*, *Cenchrus caudatus*, *Cirsium vulgare*, *Cynodon dactylon*, *Cyperus textilis*, *Delosperma testaceum*, *Exomis microphylla*, *Juncus acutus*, *Limonium scabrum*, *Lycium cinereum*, *Maireana brevifolia*, *Mesembryanthemum cordifolium*, *Myoporum montanum*, *Nidorella ivifolia*, *Opuntia ficus-indica*, *Phragmites australis*, *Salicornia pillansii*, *Searsia pallens*, *Searsia rehmanniana*, *Senecio burchellii*, *Sporobolus virginicus* and *Vachellia karroo*.

This species list indicates natural vegetation in moderately poor (disturbed) condition. There are several exotic species, as well as species associated with the nearby riparian vegetation. It is an area that has been disturbed by historic and surrounding cultivation, has probably been heavily grazed for a long time.



Figure 1: Current status (left) and probable previous status (right) of Cleared Area 2.



Figure 6. Historical photos showing the continued agricultural use since 1991.

Historical aerial photographs from 1990 below clearly indicate that the area had been previously cultivated (white and no remaining natural vegetation which is the darker surrounding colour). While later aerial photos from 2005, 2017, 2022 and 2024 show continuing grazing of the area with recent ploughing to improve the pasture.

There is a long history of local disturbance associated with cultivation and grazing. The conclusion is that this area was recently cultivated but that the vegetation cleared was not in a natural state due to a history of agricultural use (poor condition).

CapeNature and BOCMA have indicated that future ploughing in this area should be kept above of the 1:100 year flood line where applicable. Areas closer to the watercourse would historically have supported Cape Lowland Alluvial vegetation prior to transformation for agricultural use.

3

Cleared area 3

The area is currently cleared and appears to have been ploughed (Figure 7). There is therefore no vegetation. Historical imagery shows that the cleared area was dominated by a grove of alien trees, probably *Eucalyptus* species. There are no nearby areas in a natural state that would provide a benchmark for what could have occurred there prior to the gum woodlot.

Historical aerial photographs from 1954, 1960, 1966, 1984 and 1991 are available for the site. All of these show that the affected area has had a grove / woodlot of alien trees. The conclusion is that this area had a long history of plantation / woodlot use with alien trees for more than 70 years therefore no natural vegetation has existed there for this period of time.



Figure 7: Current status (left) and pile of felled wood (right) of Cleared Area 3.



Figure 8: 2013 aerials showing the gum tree woodlot prior to clearing (left), 2017 continued use for grazing (middle) and immediately after stump removal and continued grazing 2019 (right)

The clearing activities were therefore of alien vegetation in an area with no natural vegetation remaining.

4

Cleared area 4

The area is currently cleared and is ploughed (Figure 9 left). There is therefore no vegetation. Historical imagery shows that the cleared area was very similar (has the same spectral and textural aerial photograph signature) to an adjacent area that was not cleared (Figure 9 right). This adjacent area is therefore a good reference site for what was lost within the cleared area.

A complete list of plant species found in the adjacent area is as follows: *Cenchrus caudatus*., *Cenchrus clandestinus*, *Cliffortia strobilifera*, *Cynodon dactylon*, *Drosanthemum ambiguum*, *Eragrostis curvula*, *Aizoon pubescens*, *Persicaria* species, *Nidorella ivifolia*, *Paspalum urvillei*, *Phytolacca octandra*, *Pseudognaphalium oligandrum*, *Typha capensis* and *Wahlenbergia procumbens*.

This species list indicates natural vegetation in moderate (ecologically functional) condition). There are several exotic species, but the expected vegetation here would have been dominated by grasses with local patches of the shrub, *Cliffortia strobilifera*. It is a historically grazed floodplain adjacent to a river channel and would have had naturally high levels of disturbance due to use for grazing and occasional flooding.

Historical aerial photographs from 1954, 1960, 1966, 1984 and 1991 are available for the site.



Figure 9: Current status (left) and probable previous status (right) of Cleared Area 4.

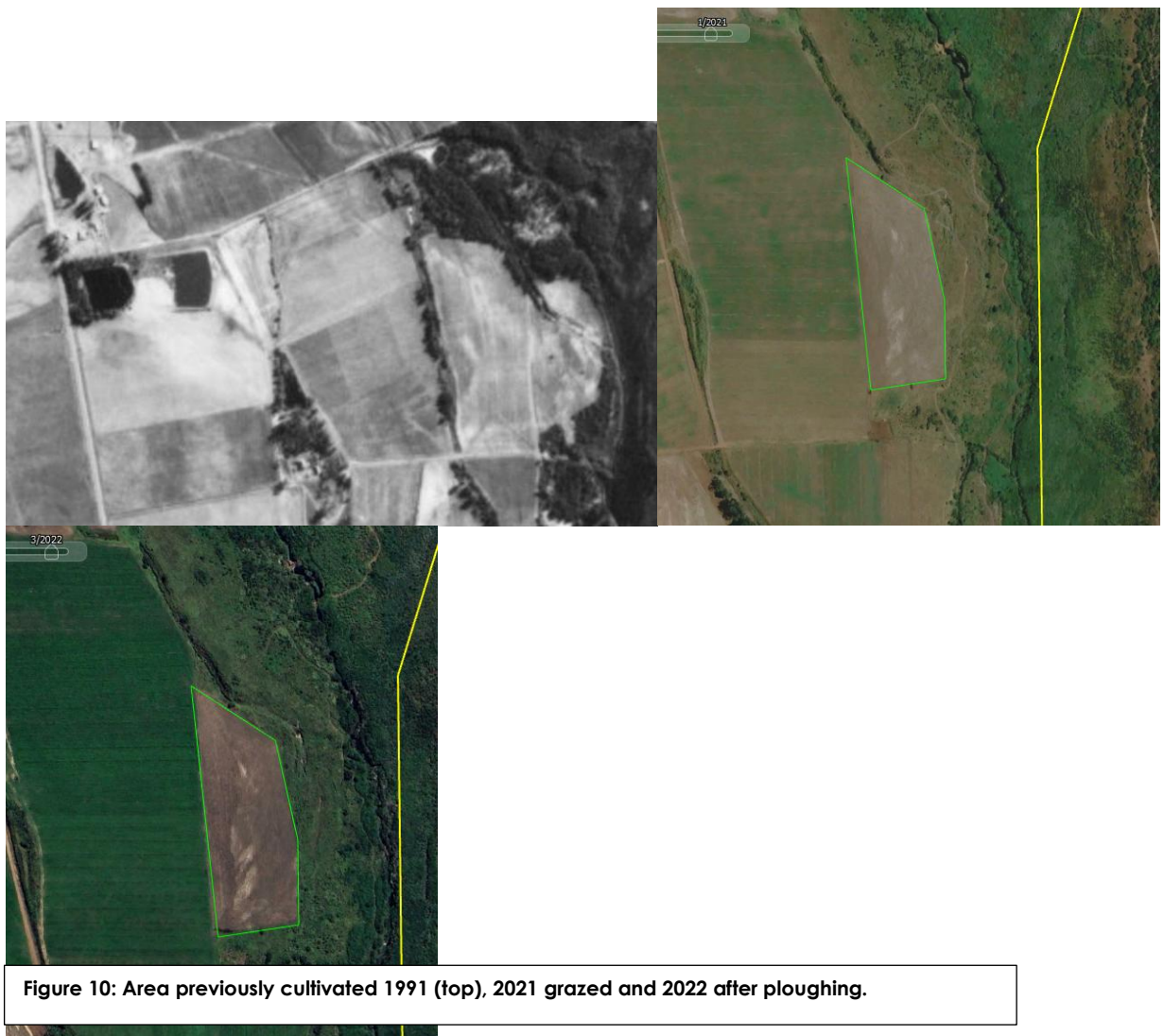


Figure 10: Area previously cultivated 1991 (top), 2021 grazed and 2022 after ploughing.

Previous cultivation within the contested area is clearly evident in 1991 this area appears to have been invaded with alien vegetation prior to 1991, indicating previous cultivation and disturbance. It forms part of the riparian floodplain linked to adjacent areas of similar use. The area was previously cultivated and therefore continued occasional cultivation to restore the grazing is consistent with the surrounding uses. Limited vegetation in a natural state may have been cleared.

CapeNature and BOCMA have indicated that future ploughing in this area should be kept above of the 1:100 year flood line where applicable. Areas closer to the watercourse would historically have supported Cape Lowland Alluvial vegetation prior to transformation for agricultural use.

For Site 1, evidence indicates that the area was in a natural state prior to being ploughed, although probably in poor condition.

For sites 2 and 4 the areas had historically been previously cultivated and cultivation of these areas to improve the grazing condition is consistent with the farm management for the area. For Site 3, aerial photographs show that this location has been under *Eucalyptus* trees for more than 70 years and grazed since removing the woodlot. The area no longer had any natural habitat or vegetation remaining.

For Sites 2, 3 and 4, based on topographical position and remnant nearby vegetation, the original vegetation would have been (unmapped) Cape Lowland Alluvial Vegetation and not Eastern Ruens Shale Renosterveld. CapeNature and BOCMA have indicated that future ploughing in these area should be kept above of the 1:100 year flood lines where applicable. Areas closer to the watercourse would historically have supported Cape Lowland Alluvial vegetation prior to transformation for agricultural use.

For Site 1, it is probable that this site contained a disturbed and degraded remnant of the Endangered vegetation, Eastern Ruens Shale Renosterveld. Loss of this small area has not contributed to significant loss of the ecosystem type.

What is clear is that there is a requirement for the farm as a whole to have a management plan in place that covers ongoing farm management as well as alien invasive species management, recreational school use management, wetland management and biodiversity management for the remnants of ecosystems still occurring in order to prevent a similar occurrence in the future of gradual expansion into natural ecosystem areas. (BioCensus, 2025).

6.2 VEGETATION AND/OR GROUNDCOVER (POST-COMMENCEMENT)

Cross out ("X") the block **and** describe (where required) the vegetation types / groundcover present on the site after commencement of the activity.

Indigenous Vegetation - good condition		Indigenous Vegetation with scattered aliens		Indigenous Vegetation with heavy alien infestation	
Describe the vegetation type above:	Describe the vegetation type above:		Describe the vegetation type above:		
Provide ecosystem status for above:	Provide ecosystem status for above:		Provide Ecosystem status for above:		
Indigenous Vegetation in an ecological corridor or along a soil boundary / interface	Veld dominated by alien species		Distinctive soil conditions (e.g. Sand over shale, quartz patches, limestone, alluvial deposits, termitaria etc.) – describe		
Bare soil	Building or other structure		Sport field		
Other (describe below)	Cultivated land		Paved surface		

(a) Highlight and describe the post-construction habitat condition on site.

Habitat Condition	Percentage of habitat condition class (adding up to 100%)	Description and additional Comments and Observations (including additional insight into condition, e.g. poor land management practises, presence of quarries, grazing/harvesting regimes etc).
Natural	%	
Near Natural (includes areas with low to moderate level of alien invasive plants)	%	

Degraded (includes areas heavily invaded by alien plants)	%	
Transformed (includes cultivation, dams, urban, plantation, roads, etc)	100%	Cultivated lands

(b) How have the vegetation and/or aquatic ecosystem(s) present on site (including any important biodiversity features identified on site (e.g. threatened species and special habitats)) been affected by the commencement of the listed activity(ies)?

For Site 1, evidence indicates that the area was in a natural state prior to being ploughed, although probably in poor condition.

For sites 2 and 4 the areas had historically been previously cultivated and cultivation of these areas to improve the grazing condition is consistent with the farm management for the area. For Site 3, aerial photographs show that this location has been under Eucalyptus trees for more than 70 years and grazed since removing the woodlot. The area no longer had any natural habitat or vegetation remaining.

For Sites 2, 3 and 4, based on topographical position and remnant nearby vegetation, the original vegetation would have been (unmapped) Cape Lowland Alluvial Vegetation and not Eastern Ruens Shale Renosterveld.

For Site 1, it is probable that this site contained a disturbed and degraded remnant of the Endangered vegetation, Eastern Ruens Shale Renosterveld. Loss of this small area has not contributed to significant loss of the ecosystem type.

What is clear is that there is a requirement for the farm as a whole to have a management plan in place that covers ongoing farm management as well as alien invasive species management, recreational school use management, wetland management and biodiversity management for the remnants of ecosystems still occurring in order to prevent a similar occurrence in the future of gradual expansion into natural ecosystem areas. (BioCensus, 2025).

Aquatic ecosystems have not been affected or altered in any way.

Approximately 9038m² of natural vegetation, in a poor condition through years of associated agricultural activities, has been permanently transformed.

6.3 VEGETATION / GROUNDCOVER MANAGEMENT

(a) Describe any mitigation/management measures that were adopted and the adequacy of these:

Fields 2 and 4 were cultivated historically based on 1991 historic aerial image (white arrows):

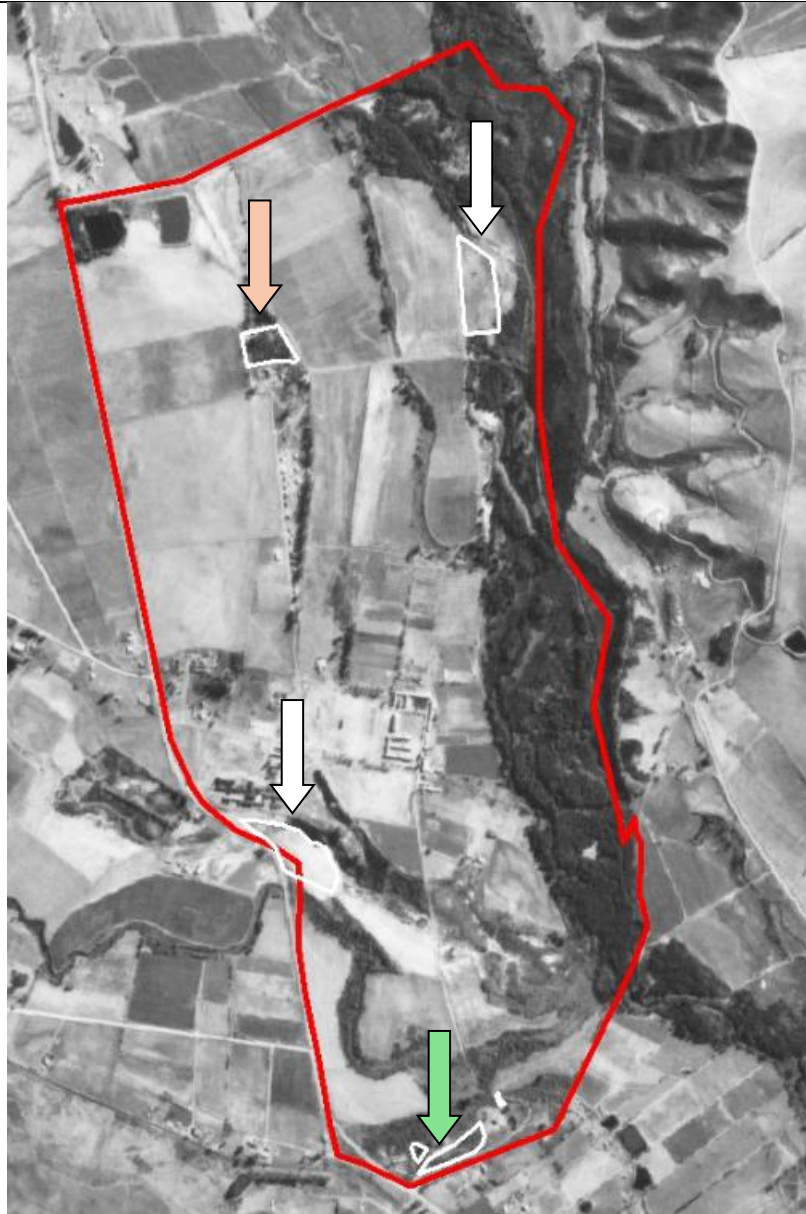
- Mitigation management practiced at these sites was to rip the existing pastures and seed with additional pasture grasses in order to improve the grazing at the sites.
- Fences were repaired in order to limit livestock movement into the adjacent floodplain areas.

Field 3 was a gum woodlot Eucalyptus trees for more than 70 years (cream arrow):

- These were harvested and herbicide applied in 2013. The area was then left with grazing between the stumps until 2017 when the stumps were removed to a pile and the area was converted into a pasture.
- Mitigation included control of the spread of alien infestation into surrounding areas.

Field 1 was used historically for grazing in and around the homestead resulting in transformation of the original vegetation (green arrow) :

- This area was formally cultivated.



1991 historic aerial image highlighting fields 2 and 4 with the white arrow

The track that was historically used for access between the fields was shortened to a more direct route and the longer track has been rehabilitated and is no longer in use:

- Mitigation was to close the longer track and rehabilitate it and open a shorter, more direct route for livestock movement.



1960 historic aerial highlighting the track area with the red circle (left) and new track and old track indicated on the current aerial photo.

Based on the above historic aerial analysis, all of the fields were historically disturbed, were cultivated or used for the current purpose. Only site 1 may have supported remnants of disturbed Eastern Ruens Shale Fynbos.

- The pastures created are defined and fenced preventing further enlargement.
- The pastures are well managed.
- The tracks used are maintained and not widened.
- There are no signs of any erosion.

CapeNature and BOCMA have indicated that future ploughing in this area should be kept above of the 1:100 year flood line where applicable.

7. LAND USE OF THE SITE (PRE-COMMENCEMENT)

Please note: The Department may request specialist input/studies depending on the nature of the land use character of the area and potential impact(s) of the activity/ies.

Untransformed area	Low density residential	Medium density residential	High density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	Medium industrial	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	Tourism & Hospitality facility
Open cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	Dam or reservoir
Hospital/medical centre	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	Agriculture	River, stream or wetland	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):				

(a) Please provide a description.



The Agricultural School has various areas under cultivation, together with school buildings and sport facilities and remaining natural areas, mostly associated with the riparian systems and wetlands.

The sites in question are all part of the agricultural use areas of the school.

8. LAND USE CHARACTER OF SURROUNDING AREA (PRE-COMMENCEMENT)

Cross out ("X") the block that reflects the past land uses and/or prominent features that occur/red within +/- 500m radius of the site and neighbouring properties if these are located beyond 500m of the site. **Please note:** The Department may request specialist input/studies depending on the nature of the land use character of the area and impact(s) of the activity/ies.

Untransformed area	Low density residential	Medium density residential	High density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	Medium industrial	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	Tourism & Hospitality facility
Open cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	Dam or reservoir
Hospital/medical centre	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	Agriculture	River, stream or wetland	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):				

9. LAND USE CHARACTER OF SURROUNDING AREA (POST-COMMENCEMENT)

Cross out ("X") the block that reflects the current land uses and/or prominent features that occur(s) within +/- 500m radius of the site and neighbouring properties if these are located beyond 500m of the site. **Please note:** The Department may request specialist input/studies depending on the nature of the land use character of the area and impact(s) of the activity/ies.

Untransformed area	Low density residential	Medium density residential	High density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	Medium industrial	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	Tourism & Hospitality facility

Open cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	Dam or reservoir
Hospital/medical centre	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	Agriculture	River, stream or wetland	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):				

10. SOCIO-ECONOMIC CONTEXT

10.1 SOCIO-ECONOMIC CONTEXT (PRE-COMMENCEMENT)

Describe the pre-commencement social and economic characteristics of the community in order to provide baseline information.

**It is a well-known Agricultural High School within Riversdale Town that provides invaluable on site agricultural training at high school level.
It educates a number of pupils and provides various long-term jobs.
The operation includes farming production which contributes to the agricultural economy of the region.**

10.2 SOCIO-ECONOMIC CONTEXT (POST-COMMENCEMENT)

Describe the post commencement social and economic characteristics of the community in order to determine any change. Where differences between pre- and post-commencement exist, state which are as a result of the activity(ies) for which rectification is being applied for.

Following the improvement of the lands, additional pastures were available for rotational use for the cattle as part of the operation of the school (positive socio-economic impacts as it assures existing jobs, production and education of pupils). As confirmed by Hennie Uys (Dairy manager):

*"The Oakdale Jersey herd of 840 animals are mainly managed on pasture.
We mainly apply conservation farming principles and decrease our carbon footprint annually according to Nestle's conservation farming audit.
The five plots of land are of crucial importance in our feed flow program and mainly planted with ryegrass and oats in the winter. It is grazed on rotation and in January we spread about (2) two tonnes of manure per hectare on the fields.
The pH is corrected with lime and gypsum according to prescription.
The land is important to us, as we see it as an investment in our youth and also involve them daily in crop planting and grazing schedules.
Since our summer temperatures rise above 40 degrees, it is difficult to plant perennial crops such as clover, lucerne, chicory plantain.
However, if we get good rain in November, December, we plant teff to build up the soil's organic matter and humus.
At Oakdale, we view land as our inheritance and wealth for our descendants".*

As such

- **The activity has enhanced the practical training capacity of Hoër Landboueskool Oakdale, allowing learners to engage directly with cultivated fields and livestock infrastructure. This has strengthened the school's role as a regional agricultural training hub.**
- **The operation of the fields/track furthermore generated short-term economic activity (land preparation, fencing, and maintenance—benefiting local contractors and suppliers and existing staff)**
- **The additional fields resulted in higher livestock productivity as part of the rotational grazing system.**

11. HISTORICAL AND CULTURAL ASPECTS

- (a) Please be advised that every application for Environmental Authorisation including an application for a Waste Management Licence, must include, where applicable the investigation, assessment and evaluation of the impact of any proposed listed or specified activity on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), excluding the national estate contemplated in section 3(2)(i)(vi) and (vii) of that Act.

Please be further advised that if section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), is applicable to your application, then you are requested to furnish this Department with written comment from Heritage Western Cape as part of your public participation process. Section 38 of the Act states as follows: "38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as-

- (a) the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;

- (b) the construction of a bridge or similar structure exceeding 50m in length;
 - (c) any development or other activity which will change the character of a site-
 - (i) exceeding 5 000 m² in extent; or
 - (ii) involving three or more existing erven or subdivisions thereof; or
 - (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
 - (iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;
 - (d) the re-zoning of a site exceeding 10 000 m² in extent; or
 - (e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development."
- (b) The impact on any national estate referred to in section 3(2), excluding the national estate contemplated in section 3(2)(i)(vi) and (vii), of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), must also be investigated, assessed and evaluated. Section 3(2) states as follows: "3(2) Without limiting the generality of subsection (1), the national estate may include—
- (a) places, buildings, structures and equipment of cultural significance;
 - (b) places to which oral traditions are attached or which are associated with living heritage;
 - (c) historical settlements and townscapes;
 - (d) landscapes and natural features of cultural significance;
 - (e) geological sites of scientific or cultural importance;
 - (f) archaeological and palaeontological sites;
 - (g) graves and burial grounds, including—
 - (i) ancestral graves;
 - (ii) royal graves and graves of traditional leaders;
 - (iii) graves of victims of conflict;
 - (iv) graves of individuals designated by the Minister by notice in the Gazette;
 - (v) historical graves and cemeteries; and
 - (vi) other human remains which are not covered in terms of the Human Tissue Act, 1983 (Act No. 65 of 1983);
 - (h) sites of significance relating to the history of slavery in South Africa;
 - (i) movable objects, including—
 - (i) objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens;
 - (ii) objects to which oral traditions are attached or which are associated with living heritage;
 - (iii) ethnographic art and objects;
 - (iv) military objects;
 - (v) objects of decorative or fine art;
 - (vi) objects of scientific or technological interest; and
 - (vii) books, records, documents, photographic positives and negatives, graphic, film or video material or sound recordings, excluding those that are public records as defined in section 1(xiv) of the National Archives of South Africa Act, 1996 (Act No. 43 of 1996)."

Is section 38 of the National Heritage Resources Act, 1999, applicable to the development?		YES	NO
		UNCERTAIN	
If YES, explain:	HWC confirmed "The creation of the agricultural fields has not changed the character – or would not have – as such the provisions of Section 38(1) of the NHRA are not applicable" (16 April 2025). See App G – Ann E for this correspondence with HWC.		
Did/does the development impact on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999?		YES	NO
		UNCERTAIN	
If YES, explain:	N/A		
Was any building or structure older than 60 years affected in any way?		YES	NO
		UNCERTAIN	
If YES, explain:	N/A		

Please Note:

If uncertain, the Department may request that specialist input be provided. If, yes, a copy of the Notice of Intent submitted to Heritage Western Cape must be submitted with this form.

12. COASTAL ASPECTS (SEAFRONT/SEA ENVIRONMENT)

(a) Is the site(s) located within any of the following areas? (highlight the appropriate boxes).

If the site or alternative site is closer than 100m to such an area, please provide the approximate distance in (m).

AREA	YES	NO	UNSURE	If "YES": Distance to nearest area (m)
An area within 100m of the high water mark of the sea	YES	NO	UNSURE	
An area within 100m of the high water mark of an estuary/lagoon	YES	NO	UNSURE	
An area within the littoral active zone	YES	NO	UNSURE	
An area in the coastal public property	YES	NO	UNSURE	
Major anthropogenic structures	YES	NO	UNSURE	
An area within a Coastal Protection Zone	YES	NO	UNSURE	
An area seaward of the coastal management line	YES	NO	UNSURE	
An area within the high risk zone (20 years)	YES	NO	UNSURE	
An area within the medium risk zone (50 years)	YES	NO	UNSURE	
An area within the low risk zone (100 years)	YES	NO	UNSURE	
An area below the 5m contour	YES	NO	UNSURE	
An area within 1km from the high water mark of the sea	YES	NO	UNSURE	
A rocky beach	YES	NO	UNSURE	
A sandy beach	YES	NO	UNSURE	

(b) If any of the answers to the above is "YES" or "UNSURE", specialist input may be requested by the Department. (The 1:50 000 scale Regional Geotechnical Maps prepared by Geological Survey may also be used).

13. REGIONAL PLANNING CONTEXT

Is the activity permitted in terms of the property's existing land use rights?	YES	NO	Please explain
Existing agricultural school with pastures for livestock grazing. The improvement of the existing grazing ads to the productivity of the property.			
Will the activity be in line with the following?			
Provincial Spatial Development Framework (PSDF)	YES	NO	Please explain
The primary objectives commit the Western Cape's SDF is to safeguard these assets: i. Protect biodiversity and agricultural resources. ii. Minimise the consumption of scarce environmental resources, particularly water, fuel, and land – in the latter case especially pristine and other rural land, which is the Western Cape's 'goldmine-above-the ground' (i.e. a non-renewable resource). iii. Conserve and strengthen the sense of place of important natural, cultural and productive landscapes, artefacts and buildings. The activity is in line with the objectives as the lands form part of the operation of an agricultural school and provide essential pastures for grazing. The improvement of the pastures increases productivity. Irrigation is done in terms of the existing lawful water use. The sites have been assessed by the specialist accordingly. It is therefore in line with the following policy, policy 3 of the WCSDF (2004): The following 2009 PSDF POLICY R3: SAFEGUARD THE WESTERN CAPE'S AGRICULTURAL AND MINERAL RESOURCES, AND MANAGE THEIR SUSTAINABLE USE 1. Record unique and high potential agricultural land (as currently being mapped by the Provincial Department of Agriculture) in municipal SDFs, demarcate urban edges to protect these assets, and adopt and apply policies to protect this resource (especially in areas where raw water is available). 2. Record the location of mineral deposits and known reserves of construction materials in municipal SDFs, and introduce and apply land use policies that reserve these assets for possible use (subject to environmental authorization). 3. Reconcile ecosystem requirements with conflicting land development pressures through proactive spatial planning, and application of a land use management system that safeguards biodiversity, protects resources and opens up opportunities for improved livelihoods and jobs. 4. Use transformed areas first for new farming and mining ventures. The agricultural fields were essential for grazing of cattle as confirmed by the applicant: <i>The Oakdale Jersey herd of 840 animals are mainly managed on pasture.</i> <i>We mainly apply conservation farming principles and decrease our carbon footprint annually according to Nestle's conservation farming audit.</i> <i>The five plots of land are of crucial importance in our feed flow program and mainly planted with ryegrass and oats in the winter. It is grazed on rotation and in January we spread about (2) two tonnes of manure per hectare on the fields.</i>			

The ph is corrected with lime and gypsum according to prescription.
 The land is important to us, as we see it as an investment in our youth and also involve them daily in crop planting and grazing schedules.
 Since our summer temperatures rise above 40 degrees, it is difficult to plant perennial crops such as clover, lucerne, chicory plantain.
 However, if we get good rain in November, December, we plant teff to build up the soil's organic matter and humus.

The lands are high agriculture potential as confirmed by the agricultural specialist, Gert Malan. The track was necessary for cattle movement along a more direct route. The historic access route has been rehabilitated.

The impact were assessed by the specialist "A second observation is that, in all cases, there has been a long history of disturbance on site associated with long-term cultivation, animal husbandry and associated agricultural activities, and that any remaining patches of natural vegetation bear the scars of this history - they are generally in poor condition, with low species diversity, dominance by species that tolerate disturbance, and accompanied by several alien invasive species".

Urban edge / Edge of Built environment for the area	YES	NO	Please explain
The school is not located within but adjacent to the urban edge of Riversdale.			
Integrated Development Plan of the Local Municipality	YES	NO	Please explain
The fields and track form part of an operational agricultural school as such the school forms part of the IDP.			
Spatial Development Framework of the Local Municipality	YES	NO	Please explain
The property is not located within the urban edge but is a well know operational agricultural school (Government Owned Land, institutional zone as per the SDF), the fields/track forms part of the agricultural activities and operation of the school, therefore it is in line with the SDF.			
Approved Structure Plan of the Municipality	YES	NO	Please explain
No structure plan in place for Hessequa Municipality.			
An Environmental Management Framework (EMF) adopted by the Department	YES	NO	Please explain
There is no EMF for Hessequa, the Garden Route EMF therefore applies.			
The activities commenced with have been assessed by the specialist confirming that the areas cleared supported low sensitivity habitat. Sensitive areas remain conserved.			
The activities did not result in any secondary negative environmental impacts.			
Any other Plans	YES	NO	Please explain
None			

SECTION D: NEED AND DESIRABILITY

Please Note: Before completing this section, first consult this Department's *Guideline on Need and Desirability* (March 2013) available on the Department's website (<http://www.capegateway.gov.za/eadp>).

1. Was the activity permitted in terms of the property's land use rights at the time of commencement?	YES	NO	Please explain
Existing agricultural school with pastures for livestock grazing. The improvement of the existing grazing ads to the productivity of the property.			

2. Was the activity in line with the following?			
(a) Provincial Spatial Development Framework (PSDF)	YES	NO	Please explain
See section above			
(b) Urban edge / Edge of Built environment for the area	YES	NO	Please explain
The property is not located within the urban edge or within the built edge of Riversdale.			
(c) Integrated Development Plan and Spatial Development Framework of the Local Municipality (e.g. would the approval of this application have compromised the integrity of the existing approved and credible municipal IDP and SDF?).	YES	NO	Please explain
See section above			
(d) Approved Structure Plan of the Municipality	YES	NO	Please explain
None in place			

(e) An Environmental Management Framework (EMF) adopted by the Department (e.g. Would the approval of this application have compromised the integrity of the existing environmental management priorities for the area and if so, can it be justified in terms of sustainability considerations?)	YES	NO	Please explain
No impact on the EMF			
(f) Any other Plans (e.g. Guide Plan)	YES	NO	Please explain
None			

3. Was the land use (associated with the activity for which rectification is sought) considered within the timeframe intended by the existing approved Spatial	YES	NO	Please explain
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Development Framework (SDF) agreed to by the relevant environmental authority (i.e. was the development in line with the projects and programmes identified as priorities within the relevant IDP)?			
The property is zoned as and is an existing operational agricultural school of which the activities formed part of the operation. The school is recognised in the SDF/IDP.			

4. Should development, or if applicable, expansion of the town/area concerned in terms of this land use (associated with the activity being applied for) have occurred here when activities commenced?	YES	NO	Please explain
The activities formed part of the existing operational agricultural school. The historic agricultural use has continued and management of the agricultural areas is continually improving.			

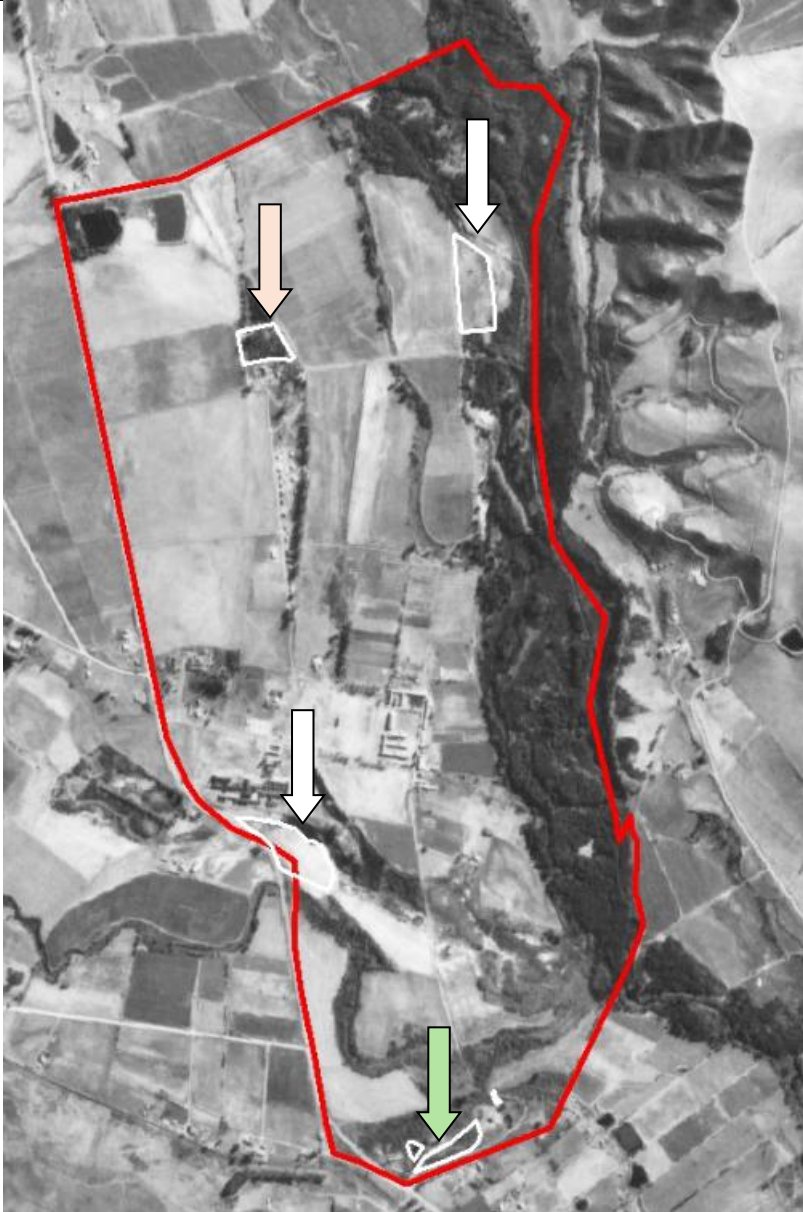
5. Did the community/area need the activity and the associated land use concerned (was it a societal priority)? (This refers to the strategic as well as local level (e.g. development is a national priority, but within a specific local context it could be inappropriate.)	YES	NO	Please explain
The improvement of the grazing was required in order to optimise the agricultural productivity of the farm. Shorter access route for livestock movement reduces the stress on livestock when moving from one pasture to the next and allowed the longer historic route to be decommissioned and rehabilitated.			

6. Were the necessary services with adequate capacity available (at the time of commencement), or was additional capacity created to cater for the development? (Confirmation by the relevant Municipality in this regard must be attached to the Application Form / additional information as an appendix , where applicable.)	YES	NO	Please explain
The farm makes use of existing infrastructure and services. Improvement of existing agricultural use is seen as a positive impact.			

7. Is/was this development provided for in the infrastructure planning of the municipality, and if not what was/will the implication be on the infrastructure planning of the municipality (priority and placement of services and opportunity costs)? (Comment by the relevant Municipality in this regard must be attached to the Application Form / additional information as an appendix , where applicable.)	YES	NO	Please explain
The agricultural components make use of existing infrastructure and resources. Existing lawful water uses in place.			
The municipal infrastructure is not applicable in this case.			

8. Was this project part of a national programme to address an issue of national concern or importance?	YES	NO	Please explain
N/A -- Not part of a national programme.			

9. Did location factors favour this land use (associated with the activity applied for) at this place? (This relates to the contextualisation of the land use on this site within its broader context.)	YES	NO	Please explain
Locational factors favour this land use. –			
All areas have been historically used for agricultural production for many years. Improvement of existing pasture and grazing management is viewed as a net positive factor in terms of sustainability and ongoing management of the farm is essential.			
Areas all cultivated historically or used for timber or grazing based on 1991 historic aerial image:			



1960 historic aerial highlighting the track area with the red circle

10. How did/does the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas (built and rural/natural environment)?	YES	NO	Please explain
There is no impact on sensitive natural or cultural areas.			
11. How did/does the development impact on people's health and wellbeing (e.g. in terms of noise, odours, visual character and sense of place, etc.)?	YES	NO	Please explain
The activities did not result in any negative health/wellbeing impacts - No additional noise – normal noise associated with agricultural activities at the agricultural school - No negative odours - normal odours associated with the agricultural activities at the agricultural school. - The activities are in line with the existing sense in place - No change to the visual character.			
12. Did/does the proposed activity or the land use associated with the activity applied for, result in unacceptable opportunity costs?	YES	NO	Please explain
No unacceptable opportunity costs as a result of the activities, the activity aligns with the zoning and the operation of the agricultural school. It resulted in additional agricultural training areas and good production benefits as well as sustainable management of existing agricultural uses.			
13. What were the cumulative impacts (positive and negative) of the land use associated with the activity applied for?	YES	NO	Please explain
Positive Impacts: • Agricultural Productivity: increased food production and livestock grazing capacity. • Educational Value: The activity provides practical training opportunities for learners at Hoër Landbouskool Oakdale, contributing to skills development in the agricultural sector. • Local Economic Contribution: Improved agricultural infrastructure may indirectly support local suppliers, contractors, and service providers. • Land Optimization: Previously underutilized areas are now being managed at their potential, increasing productive agricultural fields. These areas were historically used for the same purpose, but have not been managed correctly for a number of years. These areas did not support sensitive habitat or species as confirmed by the specialist. Negative Impacts • Loss of Indigenous Vegetation: The limited permanent loss of 9038 64,844 m² of indigenous vegetation likely to have been transformed Shale Renosterveld. • Soil Disturbance and Erosion Risk: there is no evidence of any increased erosion – pastures are being well managed. • Potential Water Resource Impacts: Increased agricultural activity could lead to higher water demand. The pastures are irrigated with in terms of the existing lawful water use.			
14. Is/was the development the best practicable environmental option for this land/site?	YES	NO	Please explain
The following conclusion was made by the specialist (Dr D Hoare, 2025): <i>For Site 1, evidence indicates that the area was in a natural state prior to being ploughed, although probably in poor condition. For sites 2 and 4 the areas had historically been previously cultivated and cultivation of these areas to improve the grazing condition is consistent with the farm management for the area. For Site 3, aerial photographs show that this location has been under Eucalyptus trees for more than 70 years and grazed since removing the woodlot. The area no longer had any natural habitat or vegetation remaining.</i> <i>For Sites 2, 3 and 4, based on topographical position and remnant nearby vegetation, the original vegetation would have been (unmapped) Cape Lowland Alluvial Vegetation and <u>not</u> Eastern Ruens Shale Renosterveld.</i> <i>For Site 1, it is probable that this site contained a disturbed and degraded remnant of the Endangered vegetation, Eastern Ruens Shale Renosterveld. Loss of this small area has not contributed to significant loss of the ecosystem type.</i> <i>What is clear is that there is a requirement for the farm as a whole to have a management plan in place that covers ongoing farm management as well as alien invasive species management, recreational school use management, wetland management and biodiversity management for the remnants of ecosystems still occurring in order to prevent a similar occurrence in the future of gradual expansion into natural ecosystem areas.</i>			
15. What are/were the benefits to society in general and to the local communities?	Please explain		
Improved grazing pastures for cattle that is essential for the operation of the school			
Assurance of job opportunities for staff at the school.			
Additional educational opportunities for the operation of the school			

16. Any other need and desirability considerations related to the activity?	Please explain
The school is well-known and an important educational facility within Riversdale. In addition, it provides various jobs to the local community. The school prides itself in sustainable management of pastures, improving these old pastures has brought them in line with the rest of the pastures at the school.	

17. Please describe how the general objectives of Integrated Environmental Management as set out in section 23 of NEMA were taken into account:
Section 23 requires the following general objectives: (2) The general objective of integrated environmental management is to— - promote the integration of the principles of environmental management set out in section 2 into the making of all decisions which may have a significant effect on the environment; - identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage, the risks and consequences and alternatives and options for mitigation of activities, with a view to minimising negative impacts, maximising benefits, and promoting compliance with the principles of environmental management set out in section 2; - ensure that the effects of activities on the environment receive adequate consideration before actions are taken in connection with them; - ensure adequate and appropriate opportunity for public participation in decisions that may affect the environment; - ensure the consideration of environmental attributes in management and decision-making which may have a significant effect on the environment; and - identify and employ the modes of environmental management best suited to ensuring that a particular activity is pursued in accordance with the principles of environmental management set out in section 2. These are achieved as follows: - Decision making based on the findings of the specialist's reports - Impacts have been identified, predicted and evaluated in terms of environmental, socio-economic and cultural heritage environment. The risks, consequences and alternatives and options for mitigation have been evaluated. - The assessment and management plan ensures that the effects of the activities on the environment receive adequate consideration before actions are taken in connection with them. - Adequate and appropriate opportunity for public participation that will lead to the decision being taken is currently being undertaken. - Environmental attributes have been considered in management and decision making. - The methods best suited to environmental management for this activity have been recommended and followed.

18. Please describe how the principles of environmental management as set out in section 2 of NEMA were taken into account:
NEMA Section 2 requires: Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably The farm management is placing environmental management at the forefront in terms of sound management of pastures. This s24G process has been undertaken transparently and with input from the relevant stakeholders. The issues / concerns / comments raised will be taken into account. Socially, environmentally and economically sustainable development The farm is managed in a socially, environmentally and economically sustainable manner. All aspects of the receiving environment and how it will be impacted have been considered and investigated to ensure that no detrimental impacts have been or will be caused to the environment. The impacts are avoided through the implementation of mitigation measures and management on site. Consideration for ecosystem disturbance and loss of biodiversity The disturbance and loss of biodiversity have been minimal with the benefits outweighing the costs (see specialists report) Pollution and environmental degradation The use and intended uses have minimal pollution and environmental degradation. Landscape disturbance There is no change to the landscape – existing agricultural context. Waste avoidance, minimisation and recycling Not applicable in this instance as the activity does not and did not produce waste. Responsible and equitable use of non-renewable resources This falls within the normal farm management. Avoidance, minimisation and remedying of environmental impacts Removal of alien vegetation and maintaining the biodiversity areas on the property. Well managed and maintained fields. Interests, needs and values of I&APs & Access information The process has been undertaken transparently, and all efforts have been made to involve all relevant stakeholders and I&APs during the public participation process. This process allows all issues / concerns / comments of the affected people to be incorporated into the final document. All stakeholders and I&APs were notified of the proposal and the availability of the documents and their comments incorporated.

- **Promotion of community well-being and empowerment**

The process has been undertaken transparently, and all efforts have been made to involve all relevant stakeholders and I&APs during the public participation process (currently underway).

The following principles were taken into consideration;

- **The pastures were historically disturbed, cultivated and/or only supported alien invasive vegetation;**
- **The track was previously used for the same purpose;**
- **No development on slopes steeper than 1:4;**
- **Positive impact on productive agricultural activities and agricultural potential of the property;**
- **To ensure the efficient use of land;**
- **To promote integrated land uses to ensure economic growth and environmental sustainability;**
- **Rehabilitation of surrounding natural areas and corridors.**

SECTION E: ALTERNATIVES

Please Note: Before completing this section, first consult this Department's *Guideline on Alternatives* (March 2013) available on the Department's website (<http://www.capegateway.gov.za/eadp>).

"Alternatives", in relation to an activity, means different means of meeting the general purposes and requirements of the activity, which may include alternatives to –

- (a) the property on which, or location where, it is to undertake the activity/the activity was undertaken;
- (b) the type of activity to be undertaken;
- (c) the design or layout of the activity;
- (d) the technology to be used in the activity;
- (e) the operational aspects of the activity; and
- (f) the option of not implementing the activity.

The NEMA prescribes that the procedures for the investigation, assessment and communication of the (potential) consequences or impacts of activities on the environment must, *inter alia*, with respect to every application for environmental authorisation –

- ensure that the general objectives of integrated environmental management laid down in NEMA and the National Environmental Management Principles set out in NEMA are taken into account; and (where applicable)
- include an investigation of the potential consequences or impacts of the alternatives to the activity on the environment and assessment of the significance of those potential consequences or impacts, including the option of not implementing the activity.

The general objective of integrated environmental management is, *inter alia*, to "identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage, the risks and consequences and alternatives and options for mitigation of activities, with a view to minimising negative impacts, maximising benefits, and promoting compliance with the principles of environmental management" set out in NEMA.

1. In the sections below, please provide a description of any considered alternatives and alternatives that were found to be feasible and reasonable.

Please note:

- Detailed written proof of the investigation of alternatives must be provided. If no reasonable or feasible alternative exists, a motivation must be provided.
- Alternatives considered for a Section 24G application are used to determine if the development was the best practicable alternative (environmentally, socially and economically) for the site or property.
- In respect of a section 24 application, the option of not implementing the activity ("no-go"), includes the option of ceasing the activity, not implementing continuation of the activity, refusal of the commenced activity and complete rehabilitation of the affected site.

- (a) Property and location/site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

There are no property alternatives – the activities all took place within the existing farm, on existing previously cultivated land or in areas already largely modified by agricultural activities.

The location of the pastures was done in accordance with the topography, accessibility, soil composition and historic use/disturbance.

- (b) Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

Activity alternatives – the pastures required management which meant that they needed to be ploughed, and soil additives were required to bring the pastures back to good agricultural potential

- (c) Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

Design and layout were informed by the historical cultivation area and existing infrastructure.

Sensitive vegetated / riparian habitat areas were avoided.

(d) Technology alternatives (e.g. to reduce resource demand and resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts or detailed motivation if no reasonable or feasible alternatives exist:

Pasture management based on sound agricultural practices.

(e) Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

Operational alternatives will include continued management of pastures to maintain optimal agricultural potential.

This will include rotational grazing, addition of soil additives as and when required based on soil tests, overseeding as required in order to build the soil and the grazing potential and sequester carbon within the soil as far as possible.

(f) The option of ceasing the activity (the refusal of the activity(ies) and/or rehabilitation of the site):

- Rehabilitation of the areas is not possible as the areas have been used for cultivation (sites 2,3 and 4) for many years.
 - The areas are required for agricultural production.
 - Field 1 is wise use of an area that was already heavily disturbed through historic agricultural use, grazing potential was increased through the cultivation of the land.
 - The activities are in line with the pre-existing operation (agricultural school).
 - The areas have been assessed by the specialist confirming that the habitat previously supported by the new fields/track was of low sensitivity
 - The fields form part of the operation of the agricultural school and the fields were created for the required purpose
 - The new livestock track was created to reduce the distance livestock need to move between pastures. The longer historic route has been rehabilitated already and is no longer in use.
- CapeNature and BOCMA have indicated that future ploughing should be kept above of the 1:100 year flood line where applicable. Grazing without cultivation, no-till methods recommended.

(g) Any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist:

Sound fencing of the pastures to limit livestock movement into more sensitive areas.

No ploughing below the 1:100 year flood lines in order to reduce the erosion risk. Grazing without cultivation would be appropriate.

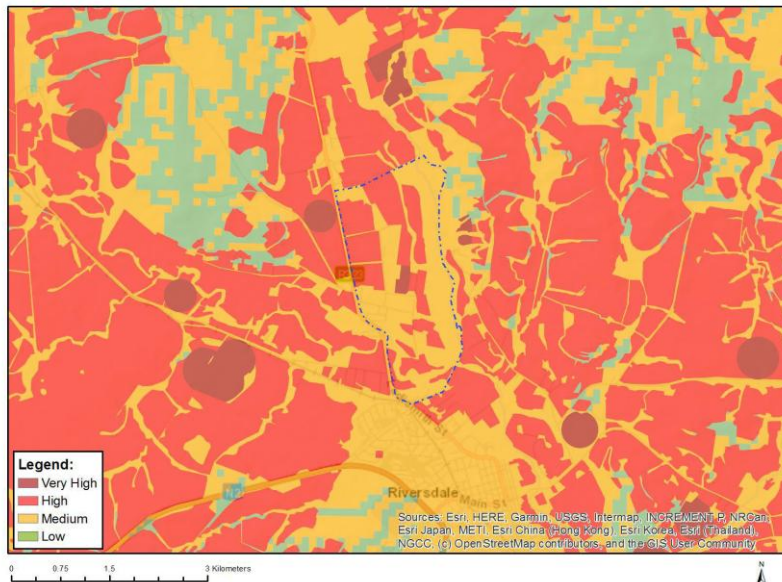
(h) Please provide a summary of the alternatives investigated and the outcomes of such investigation:

Please note: If no feasible and reasonable alternatives exist, the description and proof of the investigation of alternatives, together with motivation of why no feasible or reasonable alternatives exist, must be provided.

The fields and track created were specific to the operation of the pre-existing agricultural school and done in accordance with the areas with agricultural productive use.

The school has, over its history, made productive use of all areas suited to that purpose and has avoided disturbance to the surrounding natural areas (wetlands) along the watercourses.

Based on the historic analysis, the areas were historically disturbed, cultivated and/or used for the same purpose.



The screening tool correctly identifies the area has been used for agriculture with high and medium agricultural potential.

The activities have been assessed by specialists confirming that the habitat supported prior to commencement of clearing was of low biodiversity sensitivity but are high and medium sensitivity for agricultural production.

SECTION F: IMPACT ASSESSMENT, MANAGEMENT, MITIGATION AND MONITORING MEASURES

Please note, the impacts identified below refer to general impacts commonly associated with development activities. The list below is not exhaustive and may need to be supplemented. Where required, please append the information on any additional impacts to this application.

Please note: The information in this section must be duplicated for all the feasible and reasonable alternatives (where relevant).

1. PLEASE DESCRIBE THE MANNER IN WHICH THE DEVELOPMENT HAS IMPACTED ON THE FOLLOWING ASPECTS:

(a) Geographical and physical aspects:

The areas were all previously used for agricultural purposes due to their topography, soils and agricultural potential. These have been used since the 1920's.

The Agricultural Specialist, Gert Malan, confirmed that the soil, terrain and climate is high to very high sensitivity for agriculture and the agricultural use is a positive impact.

Good agricultural management is being implemented, the improvement of the pastures done is a positive impact on the agricultural theme.

There is no resulting erosion

Going forwards it is recommended that the areas below the 1:100 year flood line are not ploughed in order to protect the topsoil. Grazing without cultivation, no-till methods etc to be incorporated.

(b) Biological aspects:

Has the development impacted on critical biodiversity areas (CBAs) or ecological support areas (ESAs)?	YES	NO
If yes, please describe:		
According to the WCBSP mapping, the existing pastures are mapped as falling within CBA and ESA based on the CBA plan that was gazetted at the time The continued agricultural use has not changed the CBA or ESA status of the area – agricultural use areas were mapped as CBA / ESA and these remain unchanged, they are still used for agriculture. See table under section 6.1 (a).		
Has the development impacted on terrestrial vegetation, or aquatic ecosystems (wetlands, estuaries or the coastline)?	YES	NO
If yes, please describe:		
Conclusion drawn by specialist, Dr D Hoare (2025): <i>"For Site 1, evidence indicates that the area was in a natural state prior to being ploughed, although probably in poor condition.</i> <i>For sites 2 and 4 the areas had historically been previously cultivated and cultivation of these areas to improve the grazing condition is consistent with the farm management for the area. For Site 3, aerial photographs show that this location has been under Eucalyptus trees for more than 70 years and grazed since removing the woodlot. The area no longer had any natural habitat or vegetation remaining.</i> <i>For Sites 2, 3 and 4, based on topographical position and remnant nearby vegetation, the original vegetation would have been (unmapped) Cape Lowland Alluvial Vegetation and <u>not</u> Eastern Ruens Shale Renosterveld.</i> <i>For Site 1, it is probable that this site contained a disturbed and degraded remnant of the Endangered vegetation, Eastern Ruens Shale Renosterveld. Loss of this small area has not contributed to significant loss of the ecosystem type.</i> <i>What is clear is that there is a requirement for the farm as a whole to have a management plan in place that covers ongoing farm management as well as alien invasive species management, recreational school use management, wetland management and biodiversity management for the remnants of ecosystems still occurring in order to prevent a similar occurrence in the future of gradual expansion into natural ecosystem areas."</i> <i>(BioCensus, 2025).</i> <i>"The purpose of this letter is to provide confirmation regarding the impact ratings, and additional mitigation requirements and further motivation regarding the recommendations in relation to the Biodiversity Spatial Plan mapping, as requested in the letter dated 28 November 2025 from CapeNature with respect to this project.</i> <i>The location of the four sites with respect to the Biodiversity Spatial Plan (BSP) is shown in Figure 1. This shows the following:</i> <i>Site 1: Some CBA2: Terrestrial and slightly within CBA: Wetland.</i> <i>Site 2: Largely within CBA1: Terrestrial</i> <i>Site 3: Significant areas of CBA2: Terrestrial with some CBA: Wetland patches.</i> <i>Site 4: Mixed CBA1: Terrestrial and CBA2: Terrestrial.</i> <i>An impact assessment methodology is provided in Appendix 1. Each site is assessed with respect to the impact on the BSP, as well as on threatened ecosystems.</i> Impacts on BSP and threatened ecosystems. <i>All four sites contain fragments of CBA1: Terrestrial and CBA2: Terrestrial, and Sites 2 and 4 contain fragments of CBA: Wetland.</i> <i>Site 1 contained about 3500 m² of CBA1 and about 7500 m² of possibly intact vegetation in a CR ecosystem. The loss is irreversible.</i> <i>Site 2 contained about 22 050 m² of vegetation that was assessed as being more in character to Cape Lowland Alluvial Vegetation, listed as Endangered, of which about 7 500 m² is mostly CBA2: Terrestrial.</i> <i>Site 3, although largely within a "CBA1: Terrestrial", had no original natural vegetation remaining - regardless of the legal definition of natural vegetation, all information indicates that it was a grove of Eucalyptus that was possibly already there in 1960, but certainly by 1985. For the purposes of this assessment, it is not considered realistic that any natural habitat remained there.</i> <i>For site 4, the vegetation was previously degraded and heavily invaded at some point in time. Some habitat has been lost, but it is possible to functionally rehabilitate to natural wetland habitat, in this case floodplain vegetation - it is considered possible due to the naturally high disturbance regime associated with a floodplain and the possibility of natural succession to restore indigenous species in a composition that would resemble what might naturally have occurred there. About 3 000 m².</i> <i>The total loss of habitat is therefore estimated as follows:</i> <i>CBA1: 3 500 m²</i> <i>CBA2: 7 500 m² + 3 000 m²</i> <i>Eastern Ruens Shale Renosterveld: 7 500 m²</i> <i>Cape Lowland Alluvial Vegetation: 22 050 m² + 7 500 m²</i> <i>BioCensus, 2026</i>		
Has the development impacted on any populations of threatened plant or animal species, and/or on any habitat that may contain a unique signature of plant or animal species?	YES	NO
If yes, please describe:		

See conclusion made by specialist above. As generally observed by the specialist:

The property is located in proximity to the Vette River, and significant parts of the property have the characteristics of a floodplain, including being located in a lowland topographic position. This is especially true of a wide band along the eastern side of the property (most of which has been historically cultivated). The relevance of this lowland characteristic of the property is that the description of the vegetation type explicitly states that "...river valleys, watercourses and bottomlands support Aza 2 Cape Lowland Alluvial Vegetation...which are extensive but have not been mapped so far".

This is an acknowledgement that parts of the area mapped as Eastern Ruens Shale Renosterveld is "something else" that hasn't been properly mapped (yet). Observations made while undertaking this assessment indicate that, except for Site 1, all of the property is in a topographical position, and remnant vegetation is consistent with what would be expected on a floodplain, not a terrestrial ecosystem. The exception is Site 1, which is on a rise above the surrounding riparian vegetation and which would have supported Eastern Ruens Shale Renosterveld.

All of the areas had been historically either cultivated or were associated with agricultural activities and disturbances and did not form part of any linking ecological areas.

None of this condones clearance of vegetation without authorisation or without being in accordance with an approved management plan, but is recognition of the fact that the vegetation in the cleared areas 2, 3 and 4 would not have been representative of Eastern Ruens Shale Renosterveld. Only site 1 can be considered to potentially be representative of this regional vegetation type.

A second observation is that, in all cases, there has been a long history of disturbance on site associated with long-term cultivation, animal husbandry and associated agricultural activities, and that any remaining patches of natural vegetation bear the scars of this history - they are generally in poor condition, with low species diversity, dominance by species that tolerate disturbance, and accompanied by several alien invasive species." (BioCensus, 2025).

No sensitive species were observed on site or would have been anticipated to occur at the sites where activities took place.

Please describe the manner in which any other biological aspects were impacted:

No impacts – the areas historically cultivated or disturbed have been brought under the current pasture management protocol.

(c) Socio-Economic aspects:

What was the capital value of the activity on completion?	R no change – part of systematic pasture management of the school
What is the (expected) yearly income or contribution to the economy that is/will be generated by or as a result of the activity?	R additional rotational grazing – provides for 5-6 days for 61 of the 840 cattle to allow another pasture to rest.
Has/will the activity have contributed to service infrastructure? – farm pasture and rotational grazing infrastructure.	YES NO
How many new employment opportunities were/will be created in the construction phase of the activity?	No new.
What was the value of the employment opportunities during the construction phase?	R N/A – part of the systematic pasture management of the school
What percentage of this accrued to previously disadvantaged individuals? – all farm working staff are from the previously disadvantaged community.	100%
How was this ensured and monitored (please explain): existing staff	
How many permanent new employment opportunities were/will be created during the operational phase of the activity? – existing staff, existing farm management.	none
What is the current/expected value of the employment opportunities during the first 10 years?	R N/A – existing staff, existing management.
What percentage of this accrued/will accrue to previously disadvantaged individuals?	100%
How was/will this be ensured and monitored (please explain): existing staff	

Any other information related to the manner in which the socio-economic aspects was/will be impacted:

Failure to manage the existing pastures and keep them fully operational and at a productive level, will result in gradual decline and such areas when no longer actively managed tend to become overrun with alien invasive species. As such the management undertaken on the existing historic pastures and disturbed areas is viewed as a positive impact.

(d) Cultural and historic aspects:

The property has been managed by the school since 1928. There were therefore already various agricultural fields and practices. The improvements to the pastures and grazing therefore formed part of the school's operation and are in line with the sense of place. No cultural and historic aspects were impacted.

This was also confirmed by HWC stating that no NID submission was required (Email dated 16 April 2025).

2. WASTE AND EMISSIONS

(a) Waste (including effluent) management

Did the activity produce waste (including rubble) during the construction phase?		YES	NO
If yes, indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type?		m ³	
No waste produced. Organic matter was worked into the soil and contributed to the organic component of the soil.			

Does the activity produce waste during its operational phase?	YES	NO
If yes, indicate the types of waste (actual type of waste, e.g. oil, and whether hazardous or not) and estimated quantity per type?	m ³	
No operational waste.		

Where and how was/will the waste be treated / disposed of (describe)?		
No waste produced.		
Has the municipality or relevant authority confirmed that sufficient capacity exists for treating / disposing of the waste (to be) generated by this activity(ies)? If yes, provide written confirmation from Municipality or relevant authority = N/A	YES	NO
Does/will the activity produce waste that is/will be treated and/or disposed of at another facility other than into a municipal waste stream?	YES	NO
If yes, has this facility confirmed that sufficient capacity exists for treating / disposing of the waste (to be) generated by this activity(ies)? Provide written confirmation from the facility and provide the following particulars of the facility:	YES	NO
Does the facility have an operating license? (If yes, please attach a copy of the license.)	YES	NO
Facility name:		
Contact person:		
Postal address:		
	Postal code:	
Telephone:	Cell:	
E-mail:	Fax:	

Describe the measures that were/will be taken to reduce, reuse or recycle waste:
No waste production – regenerative agriculture is practiced, any organic material goes back into building the soil.

(b) Emissions into the atmosphere

Does/will the activity produce emissions that will be disposed of into the atmosphere?	YES	NO
If yes, does it require approval in terms of relevant legislation?	YES	NO
Describe the emissions in terms of type and concentration and how it is/will be treated/mitigated:		
N/A to the activity		

3. WATER USE

Please indicate the source(s) of water for the activity by ticking the appropriate boxes)

Municipal	Water board	Groundwater	River, Stream, Dam or Lake Vet River, existing water use right	Other	The activity did/does/will not use water
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If water was extracted from a groundwater source, river, stream, dam, lake or any other natural feature, please indicate
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the volume that was extracted per month:	No change to the existing lawful use.
	Water use right for irrigation is for 7000m³/Hectare per year (538m³ per month)
	Water obtained from Korente-Vette River (Korente-Vette Dam) Canal; Department of Water and Sanitation Registration 22071650.

Please provide proof of assurance of water supply (e.g. Letter of confirmation from municipality / water user associations, yield of borehole)			
Did/does the activity require a water use permit / license from DWA?	<table border="1"> <tr> <td>YES</td> <td>NO</td> </tr> </table>	YES	NO
YES	NO		
If yes, please submit a certified copy of the water use permit/license or submit the necessary application to Department of Water Affairs and attach proof thereof to this application, whichever is applicable.			
Describe the measures that were/ will be taken to reduce water demand, and measures to reuse or recycle water:			
Wise water management use is practiced over the farm.			

4. POWER SUPPLY

Please indicate the source of power supply e.g. Municipality / Eskom / Renewable energy source

The activity does not use power
If power supply is not available, where will power be sourced from?
N/A

5. ENERGY EFFICIENCY

Describe the design measures, if any, that have been taken to ensure that the activity is energy efficient:
N/A to agriculture lands
Describe how alternative energy sources have been taken into account or been built into the design of the activity, if any:
N/A to agriculture lands

6. DESCRIPTION AND ASSESSMENT OF THE SIGNIFICANCE OF IMPACTS prior to and after MITIGATION

Please note:

- While sections are provided for impacts on certain aspects of the environment and certain impacts, the sections should also be copied and completed for all other impacts.
 - Mitigation measures that were implemented and mitigation measures that are to be implemented should be clearly distinguished.
- (a) **Impacts that resulted from the planning, design and construction phases (briefly describe and compare the impacts (as appropriate), significance rating of impacts, proposed mitigation and significance rating of impacts after mitigation that occurred as a result of the planning, design and construction phases.**

Impacts on geographical and physical aspects:	
Nature of impact:	Soil disturbance during the creation of the fields and track
Extent and duration of impact:	Local and short-term alteration
Probability of occurrence:	Definite
Degree to which the impact can be reversed:	Not necessary to reverse
Degree to which the impact may cause irreplaceable loss of resources:	Low – activity was part of the pasture improvement management. Sensitive areas remain undisturbed.
Cumulative impact prior to mitigation:	None anticipated
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be mitigated:	High
Proposed mitigation:	Implement erosion control Maintain buffer areas Establish cover crops, no-till cultivation of pastures
Cumulative impact post mitigation:	Negligible
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Impact on biological aspects:	
Specialist assessment provided below	
Nature of impact:	Loss of indigenous vegetation
Extent and duration of impact:	Local and long term, although of low sensitivity
Probability of occurrence:	Definite
Degree to which the impact can be reversed:	Low to moderate
Degree to which the impact may cause irreplaceable loss of resources:	Low, specialist confirmed that the area was previous disturbed
Cumulative impact prior to mitigation:	Minor
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be mitigated:	Low
Proposed mitigation:	Conserve the remaining natural areas including riparian and wetland buffer areas Continue with alien control No further expansion of agricultural fields
Cumulative impact post mitigation:	Insignificant as the sensitive areas that have not been historically disturbed remain undisturbed and are managed as such
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

As per additional input provided by the specialist, Dr D Hoare (2026) in response to CapeNature's comments:

Impacts on BSP and threatened ecosystems.

All four sites contain fragments of CBA1: Terrestrial and CBA2: Terrestrial, and Sites 2 and 4 contain fragments of CBA: Wetland.

- Site 1 contained about 3500 m² of CBA1 and about 7500 m² of possibly intact vegetation in a CR ecosystem. The loss is irreversible.
- Site 2 contained about 22 050 m² of vegetation that was assessed as being more in character to Cape Lowland Alluvial Vegetation, listed as Endangered, of which about 7 500 m² is mostly CBA2: Terrestrial.
- Site 3, although largely within a "CBA1: Terrestrial", had no original natural vegetation remaining - regardless of the legal definition of natural vegetation, all information indicates that it was a grove of Eucalyptus that was possibly already there in 1960, but certainly by 1985. For the purposes of this assessment, it is not considered realistic that any natural habitat remained there.
- For site 4, the vegetation was previously degraded and heavily invaded at some point in time. Some habitat has been lost, but it is possible to functionally rehabilitate to natural wetland habitat, in this case floodplain vegetation - it is considered possible due to the naturally high disturbance regime associated with a floodplain and the possibility

of natural succession to restore indigenous species in a composition that would resemble what might naturally have occurred there. About 3 000 m².

The total loss of habitat is therefore estimated as follows:

CBA1: 3 500 m²

CBA2: 7 500 m² + 3 000 m²

Eastern Rûens Shale Renosterveld: 7 500 m²

Cape Lowland Alluvial Vegetation: 22 050 m² + 7 500 m²

Critical Biodiversity Areas

Resource irreplaceability: The sites occur within CBA1 and CBA 2 areas. For site 1, the vegetation was in a natural state, but the condition was degraded to highly degraded due to existing and historical disturbance and edge effects. Sites 2 and 4 contained degraded remnants of vegetation that are within a CBA2. None have properties consistent with protecting biodiversity patterns and function but were ecologically functional.

Threshold: The clearance had a very small impact on the CBA networks.

Resource condition: The vegetation on site was in relatively poor condition.

Reversibility of impact: Loss of terrestrial vegetation is probably IRREVERSIBLE, but wetland vegetation can be restored to a functional state through rehabilitation.

Extent of impact: The impact has occurred within the boundary of the property but affects spatial planning within the BSP.

Duration of impact: Loss of terrestrial habitat is assessed as being permanent. Loss of wetland habitat is assessed as being medium-term.

Intensity of impact: At a local scale, the impact on CBAs is very low.

Probability of occurrence: The impact has already occurred.

Confidence: There is a high understanding of the identity and on-site value of the vegetation, as well as the nature and extent of the activity. No measures are therefore required to improve the confidence in the assessed impact.

Mitigation: Minimization: implement alien invasive management plan.

Remediation: rehabilitate floodplain (wetland) areas.

Impact on CBAs	Biodiversity value				Impact magnitude			Probability	Significance
	I	T	C	R	E	D	M		
Before mitigation	4 for CBA1, 3 for CBA2	1	1	5 for terrestrial, 3 for wetlands	1	5 for terrestrial, 3 for wetlands	2	Definite	LOW
After mitigation	4 for CBA1, 3 for CBA2	1	1	5 for terrestrial, 3 for wetlands	1	5 for terrestrial, 3 for wetlands	1	Definite	LOW / VERY LOW

Threatened ecosystems

Resource irreplaceability: The two vegetation types affected are Eastern Rûens Shale Renosterveld (Critically Endangered) and Cape Lowland Alluvial Vegetation (Endangered).

Threshold: The clearance affected very small areas of each vegetation type.

Resource condition: The vegetation on site was in relatively poor condition.

Reversibility of impact: Loss of terrestrial vegetation is probably IRREVERSIBLE, but wetland vegetation can be restored to a functional state through rehabilitation.

Extent of impact: The impact has occurred within the boundary of the property but affects regional vegetation types.

Duration of impact: Loss of terrestrial habitat is assessed as being permanent. Loss of wetland habitat is assessed as being medium-term.

Intensity of impact: At a local scale, the impact is very low.

Probability of occurrence: The impact has already occurred.

Confidence: There is a high understanding of the identity and on-site value of the vegetation, as well as the nature and extent of the activity. No measures are therefore required to improve the confidence in the assessed impact.

Mitigation: Minimization: implement alien invasive management plan.

Remediation: rehabilitate floodplain (wetland) areas.

Impact on threatened ecosystems	Biodiversity value				Impact magnitude			Probability	Significance
	I	T	C	R	E	D	M		
Before mitigation	5 for Eastern Rûens Shale Renosterveld, 4 for Cape Lowland Alluvial Vegetation	1	1	5 for terrestrial, 3 for wetlands	1	5 for terrestrial, 3 for wetlands	2	Definite	LOW for Eastern Rûens Shale Renosterveld. VERY LOW for Cape Lowland Alluvial Vegetation
After mitigation	5 for Eastern Rûens Shale Renosterveld, 4 for Cape Lowland Alluvial Vegetation	1	1	5 for terrestrial, 3 for wetlands	1	5 for terrestrial, 3 for wetlands	1	Definite	LOW for Eastern Rûens Shale Renosterveld. VERY LOW for Cape Lowland Alluvial Vegetation

Impacts on socio-economic aspects:	
Nature of impact:	Improvement of pastures and agricultural productivity Additional training opportunities
Extent and duration of impact:	Local and long term
Probability of occurrence:	Definite
Degree to which the impact can be reversed:	Positive impact, no need to reverse
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Cumulative impact prior to mitigation:	Add to the regional agricultural economy
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	high positive
Degree to which the impact can be mitigated:	Not required
Proposed mitigation:	N/A – sustain the benefits
Cumulative impact post mitigation:	Positive contribution to the operation of the school
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	High positive

Impacts on cultural-historical aspects:	
Nature of impact:	No impact – in line with the sense of place
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Noise impacts:	
Nature of impact:	No impact
Extent and duration of impact:	
Probability of occurrence:	

Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Visual impacts / Sense of Place:	
Nature of impact:	No impact – already an agricultural operating school, historically used and in line with the sense of place
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

- (b) **Impacts that result from the operational phase** (briefly describe and compare impacts (as appropriate), significance rating of impacts, proposed mitigation and significance rating of impacts after mitigation that are likely to occur as a result of the operational phase.

Impacts on the geographical and physical aspects:	
Nature of impact:	Ongoing soil disturbance as a result of cultivation which could lead to erosion
Extent and duration of impact:	Local and short term
Probability of occurrence:	Moderate
Degree to which the impact can be reversed:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low as sound agricultural management is practiced
Cumulative impact prior to mitigation:	None
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be mitigated:	High – already mitigated – no erosion present
Proposed mitigation:	Continue with good farming practices and soil management
Cumulative impact post mitigation:	None
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Impact on biological aspects:	
Nature of impact:	None – the sensitive areas will remain undisturbed
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Impacts on the socio-economic aspects:	
Nature of impact:	Job security

	Training benefits to the school
Extent and duration of impact:	Local and long term
Probability of occurrence:	Definite
Degree to which the impact can be reversed:	Positive impact, no need to reverse
Degree to which the impact may cause irreplaceable loss of resources:	N/A
Cumulative impact prior to mitigation:	Add to the regional agricultural economy
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	high positive
Degree to which the impact can be mitigated:	Not required
Proposed mitigation:	N/A – sustain the benefits
Cumulative impact post mitigation:	Positive contribution to the operation of the school
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	High positive

Impacts on the cultural-historical aspects:	
Nature of impact:	None
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Noise impacts:	
Nature of impact:	None – forms part of the operation of an agricultural school
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Visual impacts / Sense of Place:	
Nature of impact:	None
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

- (c) Impacts that may result from the decommissioning and closure phase (briefly describe and compare the potential impacts (as appropriate), significance rating of impacts, proposed mitigation and significance rating of impacts after mitigation that are likely to occur as a result of the decommissioning and closure phase.

Not applicable therefore not assessed.

Potential impacts on the geographical and physical aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	

Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential impact on biological aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential impacts on the socio-economic aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential impacts on the cultural-historical aspects:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential noise impacts:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	

Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential visual impacts:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

(d) Any other impacts:

Potential impact:	
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

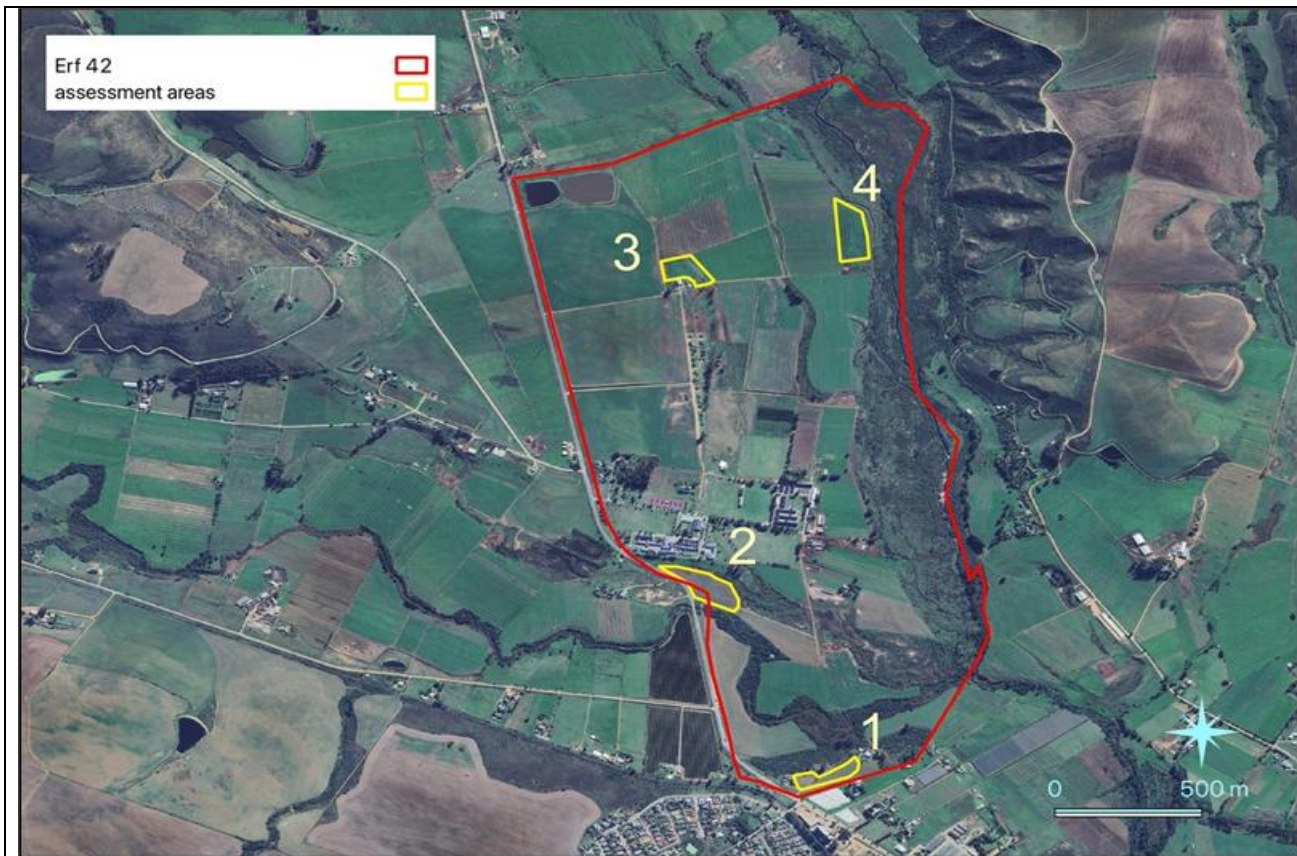
Please note: If any of the above information is not available, specialist input may be requested.

7. SPECIALIST INPUTS/STUDIES AND RECOMMENDATIONS

Please note: Specialist inputs/studies that will be undertaken as part of this application. These specialist inputs/studies must take into account the Department's relevant Guidelines on the Involvement of Specialists in EIA Processes available on the Department's website (<http://www.capegateway.gov.za/eadp>). A summary of all the specialist inputs/studies must be provided with the additional information.

Specialist inputs/studies and recommendations:

As per the specialist, BioCensus, - Dr D Hoare (2025, see specialist assessment attached): The following map shows the fields in question and the numbering used by the specialist
--



Field	Vegetation prior to commencement
1	Cleared area 1 The area is currently cleared and appears to have been ploughed (Figure 4 left). There is therefore very little vegetation, except for an occasional ruderal weed. Historical imagery shows that the cleared area was very similar (has the same spectral and textural aerial photograph signature) to an adjacent area that was not cleared (Figure 4 right). This adjacent area is therefore a good reference site for what was lost within the cleared area. A complete list of plant species found in the adjacent area is as follows: <i>Aloe ferox</i>, <i>Aspalathus alpestris</i>, <i>Asparagus multiflorus</i>, <i>Cotyledon orbiculata</i>, <i>Crassula biplanata</i>, <i>Crassula subulata</i>, <i>Cynodon dactylon</i>, <i>Cyperus eragrostis</i>, <i>Delosperma testaceum</i>, <i>Digitaria eriantha</i>, <i>Eragrostis curvula</i>, <i>Euclea undulata</i>, <i>Euphorbia clandestina</i>, <i>Gymnosporia buxifolia</i>, <i>Oedera genistifolia</i>, <i>Olea europaea</i>, <i>Osteospermum moniliferum</i>, <i>Passiflora caerulea</i>, <i>Polygonum aviculare</i>, <i>Searsia pallens</i>, <i>Searsia rehmanniana</i> and <i>Vachellia karroo</i>. This species list is not definitive but indicates natural vegetation in moderately poor (disturbed) condition. Historical aerial photographs (2012 below) show that an area of about 7000m² was transformed between 2016-2017 that had previously not been cultivated.  

There is a long history of local disturbance associated with the presence of buildings and roads.



Figure 4: Previous status 2016 (top left) and Current status 2024 (top right) of Cleared Area 1. Current status (bottom left) and probable previous status (bottom right) of Cleared Area 1.

The conclusion is that this area was not previously cultivated, but may have been used for occasional grazing and general disturbance associated with a homestead area. The recent clearing activities for cultivation were of vegetation that was in a natural state, but moderately poor condition.

Adjacent to cleared area 1 there is a new stock movement track that has been opened up between two cultivated areas. This new track replaces an existing track with a shorter route and has resulted in the rehabilitation of the longer historic track.

2 Cleared area 2
The area is currently cleared and appears to have been ploughed (Figure 5 left). There is therefore no vegetation. Historical imagery shows that the cleared area would have historically (pre-1985) been similar (has the same spectral and textural aerial photograph signature) to an adjacent area that was not cleared (Figure 5 right). This adjacent area is therefore a good reference site for what would have occurred on site had ongoing cultivation and grazing not taken place.

A complete list of plant species found in the adjacent area is as follows: *Aloe maculata*, *Asparagus africanus*, *Atriplex semibaccata*, *Cenchrus caudatus*, *Cirsium vulgare*, *Cynodon dactylon*, *Cyperus textilis*, *Delosperma testaceum*, *Exomis microphylla*, *Juncus acutus*, *Limonium scabrum*, *Lycium cinereum*, *Maireana brevifolia*, *Mesembryanthemum cordifolium*, *Myoporum montanum*, *Nidorella ivifolia*, *Opuntia ficus-indica*, *Phragmites australis*, *Salicornia pillansii*, *Searsia pallens*, *Searsia rehmanniana*, *Senecio burchellii*, *Sporobolus virginicus* and *Vachellia karroo*.

This species list indicates natural vegetation in moderately poor (disturbed) condition. There are several exotic species, as well as species associated with the nearby riparian vegetation. It is an area that has been disturbed by historic and surrounding cultivation, has probably been heavily grazed for a long time.



Figure 2: Current status (left) and probable previous status (right) of Cleared Area 2.

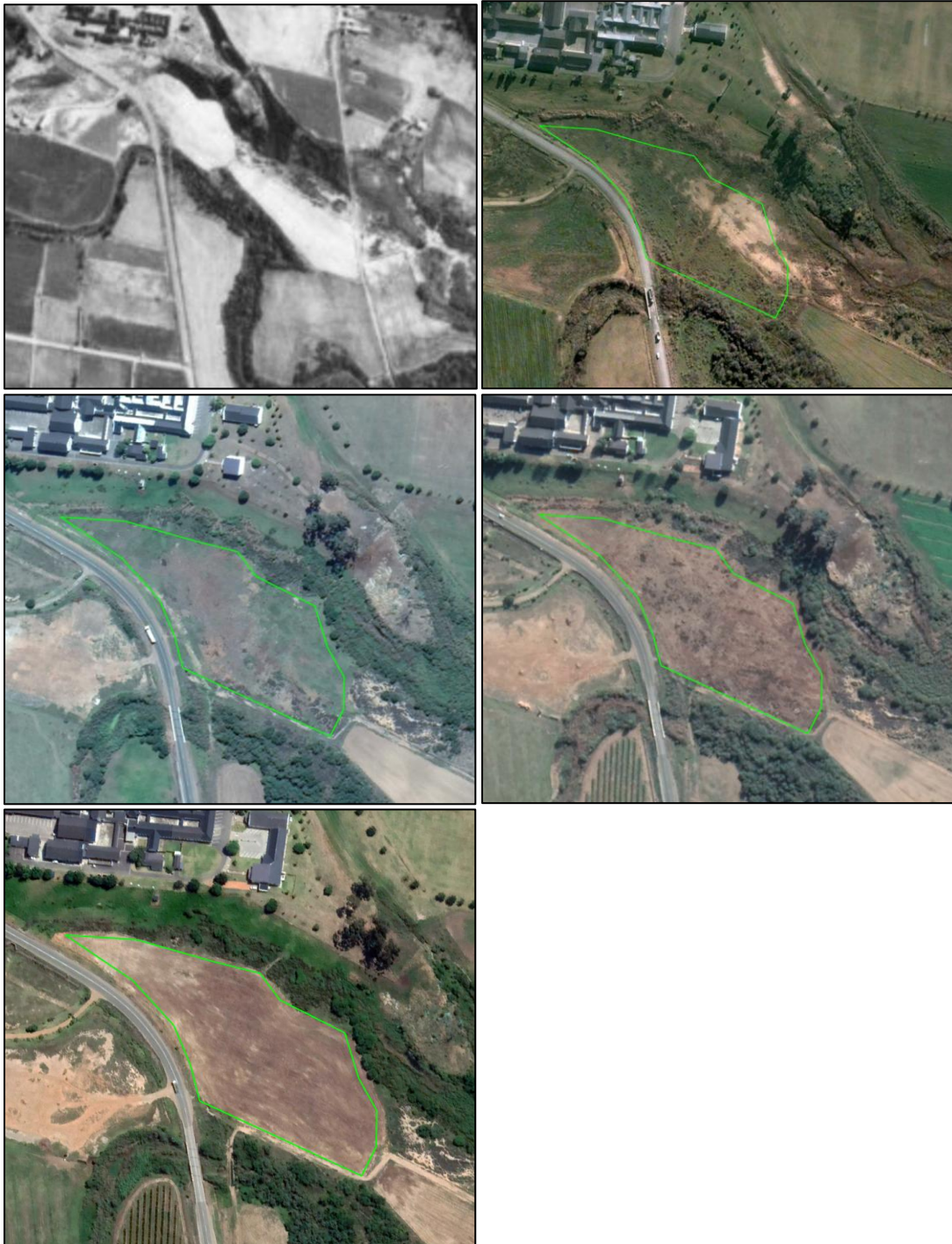


Figure 6. Historical photos showing the continued agricultural use since 1991.

Historical aerial photographs from 1990 below clearly indicate that the area had been previously cultivated (white and no remaining natural vegetation which is the darker surrounding colour). While later aerial photos from 2005, 2017, 2022 and 2024 show continuing grazing of the area with recent ploughing to improve the pasture.

There is a long history of local disturbance associated with cultivation and grazing. The conclusion is that this area was recently cultivated but that the vegetation cleared was not in a natural state due to a history of agricultural use (poor condition).

- | | |
|---|--|
| 3 | <p>Cleared area 3</p> <p>The area is currently cleared and appears to have been ploughed (Figure 7). There is therefore no vegetation. Historical imagery shows that the cleared area was dominated by a grove of alien trees, probably <i>Eucalyptus</i> species. There are no nearby areas in a natural state that would provide a benchmark for what could have occurred there prior to the gum woodlot.</p> |
|---|--|

Historical aerial photographs from 1954, 1960, 1966, 1984 and 1991 are available for the site. All of these show that the affected area has had a grove / woodlot of alien trees. The conclusion is that this area had a long history of plantation / woodlot use with alien trees for more than 70 years therefore no natural vegetation has existed there for this period of time.



Figure7: Current status (left) and pile of felled wood (right) of Cleared Area 3.



Figure 8: 2013 aerials showing the gum tree woodlot prior to clearing (left), 2017 continued use for grazing (middle) and immediately after stump removal and continued grazing 2019 (right)

The clearing activities were therefore of alien vegetation in an area with no natural vegetation remaining.

- 4 Cleared area 4**
- The area is currently cleared and is ploughed (Figure 9 left). There is therefore no vegetation. Historical imagery shows that the cleared area was very similar (has the same spectral and textural aerial photograph signature) to an adjacent area that was not cleared (Figure 9 right). This adjacent area is therefore a good reference site for what was lost within the cleared area.
- A complete list of plant species found in the adjacent area is as follows: *Cenchrus caudatus*., *Cenchrus clandestinus*, *Cliffortia strobilifera*, *Cynodon dactylon*, *Drosanthemum ambiguum*, *Eragrostis curvula*, *Aizoon pubescens*, *Persicaria* species, *Nidorella ivifolia*, *Paspalum urvillei*, *Phytolacca octandra*, *Pseudognaphalium oligandrum*, *Typha capensis* and *Wahlenbergia procumbens*.

This species list indicates natural vegetation in moderate (ecologically functional) condition). There are several exotic species, but the expected vegetation here would have been dominated by grasses with local patches of the shrub, *Cliffortia strobilifera*. It is a historically grazed floodplain adjacent to a river channel and would have had naturally high levels of disturbance due to use for grazing and occasional flooding.

Historical aerial photographs from 1954, 1960, 1966, 1984 and 1991 are available for the site.



Figure 9: Current status (left) and probable previous status (right) of Cleared Area 4.

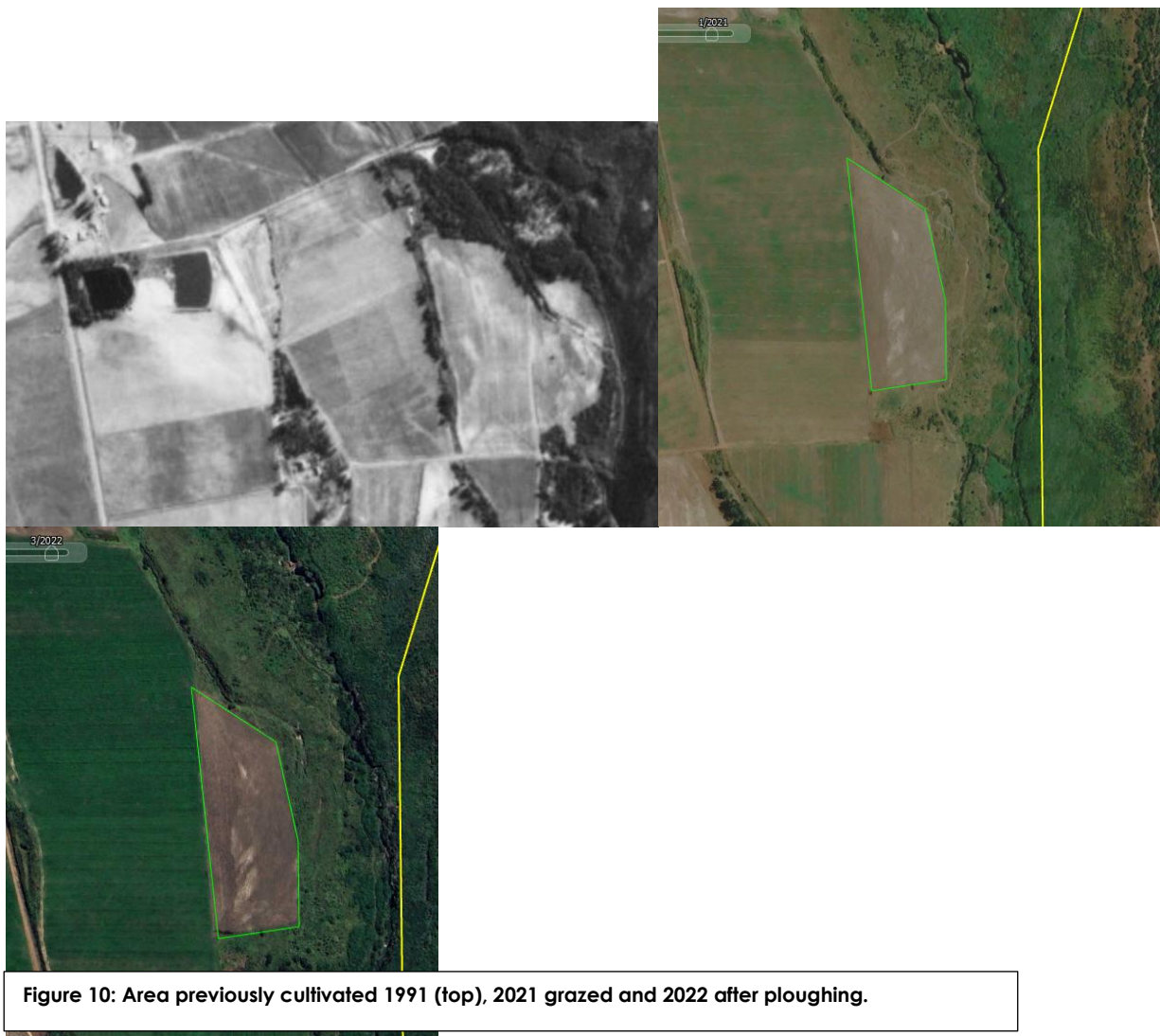


Figure 10: Area previously cultivated 1991 (top), 2021 grazed and 2022 after ploughing.

Previous cultivation within the contested area is clearly evident in 1991 this area appears to have been invaded with alien vegetation prior to 1991, indicating previous cultivation and disturbance. It forms part of the riparian floodplain linked to adjacent areas of similar use. The area was previously cultivated and therefore continued occasional cultivation to restore the grazing is consistent with the surrounding uses. Limited vegetation in a natural state may have been cleared.

For Site 1, evidence indicates that the area was in a natural state prior to being ploughed, although probably in poor condition.

For sites 2 and 4 the areas had historically been previously cultivated and cultivation of these areas to improve the grazing condition is consistent with the farm management for the area. For Site 3, aerial photographs show that this location has been under *Eucalyptus* trees for more than 70 years and grazed since removing the woodlot. The area no longer had any natural habitat or vegetation remaining.

For Sites 2, 3 and 4, based on topographical position and remnant nearby vegetation, the original vegetation would have been (unmapped) Cape Lowland Alluvial Vegetation and not Eastern Ruens Shale Renosterveld.

For Site 1, it is probable that this site contained a disturbed and degraded remnant of the Endangered vegetation, Eastern Ruens Shale Renosterveld. Loss of this small area has not contributed to significant loss of the ecosystem type.

What is clear is that there is a requirement for the farm as a whole to have a management plan in place that covers ongoing farm management as well as alien invasive species management, recreational school use management, wetland management and biodiversity management for the remnants of ecosystems still occurring in order to prevent a similar occurrence in the future of gradual expansion into natural ecosystem areas. (BioCensus, 2025).

Additional input from Dr D Hoare was requested based on CapeNatures comments requesting impact assessment of the loss of CBA and threatened ecosystems. The following findings were provided by the specialist:

The impacts on Cape Lowland Alluvial Vegetation and on Eastern Ruens Shale Renosterveld are overall considered to be of **low** significance and therefore **no biodiversity offset or other additional mitigation measures are considered necessary**.

The impacts on BSP areas are of **low significance**. The verification protocol regarding the BSP mapping needs to be put forward for verification, i.e. the current status must be confirmed so that BSP mapping can be adjusted accordingly.

Although not required to reduce impacts, it is strongly recommended that the alien invasive management plan is implemented.

Due to the high natural disturbance regime on river floodplains, the floodplain areas that have been cleared can be rehabilitated to functional wetlands with a species composition and structure that would resemble the natural state, on condition that alien species are controlled. This will minimize erosion of floodplains during flooding and thus protect downstream palmiet (*Prionium serratum*) peat wetlands associated the Vette River (Hoare, 2026).

Agricultural assessment – Gert Malan

4.1. SOIL POTENTIAL

Soils of the study area was evaluated by using the Land Type memoirs.

Soils of the area are dominated by duplex soils, which are known for their high dryland grazing potential (Table 4.1). Duplex soils can be characterized by two distinctly different structures and textured layers. Lighter texture (sandy) horizon on top of a heavy texture (clay) horizon gives way to duplex properties. Due to the underlying material, duplex soils drain poorly. This feature makes the soils excellent for in-field rainwater harvesting (IRWH). Sloped areas can drain horizontally out of the field, getting rid of excess water and salts.

Soil forms such as Oakleaf, Fernwood and Dundee has the potential to be used for horticultural crops with supplementary irrigation. Permanent crops that is traditionally grown in Riversdale area include citrus, avocados and almonds.

4.2. SOIL AND TERRAIN EVALUATION

The soils are evaluated for dryland crop production such as planted pastures. The soils are highly suited for dryland winter and summer crop production, including planted pastures. Given proper soil cultivation, management and irrigation, permanent crops can be established. Permanent crop production will largely be limited to management due to the terrain and soils inability to drain freely.

4.3. CLIMATE EVALUATION

The study area is classified as a BSk on the Köppen-Geiger Climate Zone classification system. These climate zones are Arid, steppe, cold. Together with a mean annual rainfall of 491mm the climate provides high potential for dryland crop production.

4.4. CONCLUSION

It is hereby confirmed that the soil, terrain and climate is high to very high sensitivity for agriculture. This is also a conformation of the Screening tool assessment of agriculture sensitivity.

AGRICULTURAL POTENTIAL ASSESSMENT

Although some of these plots are small, it's important to take into account the various benefits created by each (Table 5.2).

- ☐ Logistically it's more manageable to increase the existing farm with an additional 6 hectares than to rent a neighbouring farm.
- ☐ Adaptive multi-paddock grazing is used to increase field output and milk production. This relies on long recovery times – 21-45 days.
- ☐ Additional field, no matter the size, can keep a large heard of cattle even for a few days.

Table 5.2. Summary of lands and estimated dairy rotation using high pressure grazing

Affected Field No.	Hectares added	AMP Grazing Capacity (Dairy)	Estimated Grazing Time (Rotational time)
1	1	10	4
2	2.3	20	5
3	0.88	9	4
4	2.24	22	7
TOTAL	6.42	61	5.4 (weighted average)

Due to the climatic conditions in summer months, no perennial grazing crops can be established. This puts even more pressure on the annual winter cropping system. The additional lands (1-4) is usually planted for winter oats and ryegrass. If rainfall allows, summer grasses such as teff is planted.

Given proper management the soil, climate, terrain combination has a high potential for annual crop production such as planted. Oakdale employs various regenerative agriculture techniques to enhance the soils ability to continue producing sustainable crops for grazing and feeding.

Due to the factors mentioned above, it is recommended that the development should be approved.

The conclusion of this assessment on the acceptability of proposed development and the recommendation for approval is not subject to any conditions. In completing this statement, no assumptions have been made and there are no uncertainties or gaps in knowledge or data that are relevant to it. No further agricultural assessments of any kind is required for this application.

8. IMPACT ASSESSMENT SUMMARY

Briefly describe the impacts (as appropriate), significance rating of impacts, mitigation and significance rating of impacts of the activity. This must include an assessment of the significance of all impacts.

Impacts	Significance rating of impacts after mitigation (Low, Medium, Medium-High, High, Very High):
Soil disturbance and compaction during the creation of the fields and track	Low
Loss of indigenous vegetation	Low
Impact on Cape Lowland Alluvial Vegetation and Eastern Ruens Shale Renosterveld	Low
Impacts on BSP areas	Low
Improved agricultural productivity Additional training opportunities	High positive
Operational:	
Ongoing soil disturbance as a result of cultivation which could lead to erosion	Low
Job security Training benefits to the school	High positive

9. SUMMARY OF THE CONSEQUENCES OF/ IMPACTS OF THE UNLAWFULLY COMMENCED ACTIVITY/IES

Please provide a detailed summary of the consequences/impacts of commencement of the activity/ies on the environment.

Summary:

The vegetation clearing at Site 1 required environmental authorisation prior to cultivating the historic dryland grazing area.

The clearance of vegetation resulted in the removal of disturbed semi-natural vegetation

- Site 1 supported vegetation similar to Eastern Ruens Shale Renosterveld, classified as Critically Endangered. However, this area was in moderately poor and disturbed condition, showing evidence of **past disturbance and grazing**.
- The loss of remaining indigenous vegetation was therefore limited in extent and ecological significance, as most habitat was already degraded and fragmented.**
- No rare or protected plant species were recorded on site, and habitat for species of conservation concern was considered marginal due to historical land use and low species diversity.
- The cleared areas are small and there is a remaining natural linking corridor; therefore, faunal displacement was minimal
- The transformation of small, cultivated area within an existing farming landscape around the homestead is not out of place and formed part of the sense of place. It is surrounded by similar land uses

Improving the pastures at sites 2,3 and 4 is viewed as maintenance of existing agricultural uses.

- Sites 2, 3, and 4 were located on low-lying floodplain areas near the Vette River and would historically have supported **Cape Lowland Alluvial Vegetation, not Renosterveld**.
- Sites 2 and 4 were historically cultivated and have been continually grazed as such the improvements to the pastures are **not considered clearance of indigenous vegetation**.

- Site 3 – was a gum woodlot in existence for over 70 years – the harvesting took place in 2013 and it was converted to grazing in 2013. The gum stumps removed in 2017 and continued cultivation did not result in the clearance of indigenous vegetation – it was ongoing agricultural management.

Consequences:

- A localized and low-intensity reduction in habitat availability, vegetation clearing and ecological connectivity occurred at site 1.
- Cumulative biodiversity impact is considered **minor**.
- The ecological integrity of the property remains largely intact as the cleared areas are small and surrounded by existing cultivated lands. The sensitive riparian, wetland and natural areas remain undisturbed.
- Long-term soil productivity is maintained as the land continues to be used for grazing and rotational crops
- There is no noticeable erosion
- Potential for short-term sedimentation increase in nearby drainage lines if soil erosion occurs. However, good agricultural practices continue, and the buffer areas are maintained.
- Negligible change in visual landscape or sense of place.
- The improved pastures form part of the operational needs of Hoër Landbouskool Oakdale, used for practical agricultural training and livestock grazing.
- The activity contributes positively to the educational value, local employment, and agricultural productivity of the school.
- Positive long-term socio-economic benefit through enhanced training capacity and sustainable land use.

10. OTHER MANAGEMENT, MITIGATION AND MONITORING MEASURES

(a) Over and above the mitigation measures described above, please indicate any additional management, mitigation and monitoring measures.

Ongoing alien clearing and follow-up
Ongoing pasture improvement
Ongoing access road maintenance
Ongoing wetland management

(b) Describe the ability of the applicant to implement the management, mitigation and monitoring measures.

The school has implemented sound management measures.
An ACP with long-term management of open spaces, agricultural uses and school activities is now in place to prevent similar NEMA applicability clarification or enforcement actions.

Please note: A draft **ENVIRONMENTAL MANAGEMENT PROGRAMME** must be attached to this application as **Appendix I**.

SECTION G: ASSESSMENT METHODOLOGIES AND CRITERIA, GAPS IN KNOWLEDGE, UNDERLYING ASSUMPTIONS AND UNCERTAINTIES

(a) Please describe adequacy of the assessment methods used.

The assessment methods used have been based on comprehensive assessment of the site and specialist assessment by Dr D Hoare – biodiversity specialist and Gert Malan – agricultural specialist.

Aerial photography and assessment of remaining vegetated areas and agricultural use areas allowed for accurate prediction of the status of the areas prior to commencement of the activities on site.

(b) Please describe the assessment criteria used.

Seven rating scales will be considered when assessing potential impacts. These include:

- extent;
- duration;
- intensity;
- status of impact;
- probability;
- degree of confidence; and
- significance.

In assigning significance ratings to potential impacts before and after mitigation the following approach presented below is to be adhered to:

1. The core criteria for determining significance ratings are “extent”, “duration” and “intensity”. The preliminary significance ratings for combinations of these three criteria are given.

2. The status of an impact is used to describe whether the impact will have a negative, positive or neutral effect on the surrounding environment. An impact may therefore be negative, positive (or referred to as a benefit) or neutral.
3. Describe the impact in terms of the probability of the impact occurring and the degree of confidence in the impact predictions, based on the availability of information and knowledge.
4. Additional criteria to be considered, which could “increase” the significance rating if deemed justified, with motivation, are the following:
 - Permanent / irreversible impacts (as distinct from long-term, reversible impacts);
 - Potentially substantial cumulative effects; and
 - High level of risk or uncertainty, with potentially substantial negative consequences.
5. Additional criteria to be considered, which could “decrease” the significance rating if justified, with motivation, is the following:
 - Improbable impact, where confidence level in prediction is high.
6. When assigning significance ratings to impacts after mitigation:
 - First, consider probable changes in intensity, extent and duration of the impact after mitigation, assuming effective implementation of mitigation measures, leading to a revised significance rating; and
 - Then moderate the significance rating after taking into account the likelihood of proposed mitigation measures being effectively implemented. Consider:
 - Any potentially significant risks or uncertainties associated with the effectiveness of mitigation measures;
 - The technical and financial ability of the proponent to implement the measure; and
 - The commitment of the proponent to implementing the measure, or guarantee over time that the measures would be implemented.
7. The cumulative impacts of a project should also be considered. “Cumulative impacts” refer to the impact of an activity that may become significant when added to the existing activities currently taking place within the surrounding environment.
8. Where applicable, assess the degree to which an impact may cause irreplaceable loss of a resource. A resource assists in the functioning of human or natural systems, i.e. specific vegetation, minerals, water, agricultural land, etc.

A. Significance

The significance ratings are based on largely objective criteria and inform decision-making at a project level as opposed to a local community level. In some instances, therefore, whilst the significance rating of potential impacts might be “low” or “very low”, the importance of these impacts to local communities or individuals might be extremely high. The importance which I&APs attach to impacts must be taken into consideration, and recommendations should be made as to ways of avoiding or minimising these negative impacts through project design, selection of appropriate alternatives and / or management.

The relationship between the significance ratings after mitigation and decision-making can be broadly defined as follows (see overleaf): substance

Significance rating	Effect on decision-making
VERY LOW; LOW	Will not have an influence on the decision to proceed with the proposed project, provided that recommended measures to mitigate negative impacts are implemented.
MEDIUM	Should influence the decision to proceed with the proposed project, provided that recommended measures to mitigate negative impacts are implemented.
HIGH; VERY HIGH	Would strongly influence the decision to proceed with the proposed project.

B. Extent

“Extent” defines the physical extent or spatial scale of the impact.

Rating	Description
LOCAL	Extending only as far as the activity, limited to the site and its immediate surroundings. Specialist studies to specify extent.
REGIONAL	Southern Cape. Specialist studies to specify extent.
NATIONAL	South Africa
INTERNATIONAL	

C. Duration

"Duration" gives an indication of how long the impact would occur.

Rating	Description
SHORT TERM	0 - 5 years
MEDIUM TERM	5 - 15 years
LONG TERM	Where the impact will cease after the operational life of the activity, either because of natural processes or by human intervention.
PERMANENT	Where mitigation either by natural processes or by human intervention will not occur in such a way or in such time span that the impact can be considered transient.

D. Intensity

"Intensity" establishes whether the impact would be destructive or benign.

Rating	Description
ZERO TO VERY LOW	Where the impact affects the environment in such a way that natural, cultural and social functions and processes are not affected.
LOW	Where the impact affects the environment in such a way that natural, cultural and social functions and processes continue, albeit in a slightly modified way.
MEDIUM	Where the affected environment is altered, but natural, cultural and social functions and processes continue, albeit in a modified way.
HIGH	Where natural, cultural and social functions or processes are altered to the extent that it will temporarily or permanently cease.

E. Loss of resources

"Loss of resource" refers to the degree to which a resource is permanently affected by the activity, i.e. the degree to which a resource is irreplaceable.

Rating	Description
LOW	Where the activity results in a loss of a particular resource but where the natural, cultural and social functions and processes are not affected.
MEDIUM	Where the loss of a resource occurs, but natural, cultural and social functions and processes continue, albeit in a modified way.
HIGH	Where the activity results in an irreplaceable loss of a resource.

F. Status of impact

The status of an impact is used to describe whether the impact would have a negative, positive or zero effect on the affected environment. An impact may therefore be negative, positive (or referred to as a benefit) or neutral.

G. Probability

"Probability" describes the likelihood of the impact occurring.

Rating	Description
IMPROBABLE	Where the possibility of the impact to materialise is very low either because of design or historic experience.
PROBABLE	Where there is a distinct possibility that the impact will occur.
HIGHLY PROBABLE	Where it is most likely that the impact will occur.
DEFINITE	Where the impact will occur regardless of any prevention measures.

H. Degree of confidence

This indicates the degree of confidence in the impact predictions, based on the availability of information and knowledge.

Rating	Description
HIGH	Greater than 70% sure of impact prediction.
MEDIUM	Between 35% and 70% sure of impact prediction.
LOW	Less than 35% sure of impact prediction.

I. Significance

"Significance" attempts to evaluate the importance of a particular impact, and in doing so incorporates the above three scales (i.e. extent, duration and intensity).

Rating	Description
VERY HIGH	Impacts could be EITHER: of high intensity at a regional level and endure in the long term; OR of high intensity at a national level in the medium term; OR of medium intensity at a national level in the long term.
HIGH	Impacts could be EITHER: of high intensity at a regional level and endure in the medium term; OR of high intensity at a national level in the short term; OR of medium intensity at a national level in the medium term; OR of low intensity at a national level in the long term; OR of high intensity at a local level in the long term; OR of medium intensity at a regional level in the long term.
MEDIUM	Impacts could be EITHER: of high intensity at a local level and endure in the medium term; OR of medium intensity at a regional level in the medium term; OR of high intensity at a regional level in the short term; OR of medium intensity at a national level in the short term; OR of medium intensity at a local level in the long term; OR of low intensity at a national level in the medium term; OR of low intensity at a regional level in the long term.
LOW	Impacts could be EITHER of low intensity at a regional level and endure in the medium term; OR of low intensity at a national level in the short term; OR of high intensity at a local level and endure in the short term; OR of medium intensity at a regional level in the short term; OR of low intensity at a local level in the long term; OR of medium intensity at a local level and endure in the medium term.
VERY LOW	Impacts could be EITHER of low intensity at a local level and endure in the medium term; OR of low intensity at a regional level and endure in the short term; OR of low to medium intensity at a local level and endure in the short term.
INSIGNIFICANT	Impacts with: Zero to very low intensity with any combination of extent and duration.
UNKNOWN	In certain cases, it may not be possible to determine the significance of an impact.

J. Degree to which impact can be mitigated

This indicates the degree to which an impact can be reduced / enhanced.

Rating	Description
NONE	No change in impact after mitigation.
VERY LOW	Where the significance rating stays the same, but where mitigation will reduce the intensity of the impact.
LOW	Where the significance rating drops by one level, after mitigation.
MEDIUM	Where the significance rating drops by two to three levels, after mitigation.
HIGH	Where the significance rating drops by more than three levels, after mitigation.

K. Reversibility of an impact

This refers to the degree to which an impact can be reversed.

Rating	Description
IRREVERSIBLE	Where the impact is permanent.
PARTIALLY REVERSIBLE	Where the impact can be partially reversed.
FULLY REVERSIBLE	Where the impact can be completely reversed.

Determination and ranking of potential impacts is based on years of experience working on similar developments across the same area as well as applying sound environmental knowledge informed by available information on site, vegetation, development type, current condition and other relevant factors that could/ will influence such a development.

Methodology used by the specialist, Dr D Hoare, in additional input:

The analysis of impact uses a detailed assessment methodology based on several factors. These factors assess the sensitivity and significance of impacts on biodiversity resources, integrating criteria for biodiversity value and impact magnitude. The following impact assessment factors were used:

- Resource Irreplaceability (I): Measures the uniqueness and rarity of the biodiversity resource. This ranges from widespread/common resources (Low) to critically rare resources with persistence thresholds exceeded (High).
- Threshold (T): The scale of impact relative to the total distribution of the resource, representing how much the impact contributes towards ecological thresholds. Scores range from negligible to impact on a significant proportion.

- **Resource Condition (C):** The integrity and quality of the biodiversity resource, from severely degraded to fully functional in a natural state.
- **Reversibility of Impact (R):** How reversible the impact is, from reversible without rehabilitation to irreversible despite mitigation.
- **Extent of Impact (E):** The geographic scale of the impact, from site-specific to regional or global.
- **Duration of Impact (D):** Time over which the impact persists, ranging from immediate (0-1 year) to permanent (indefinite).
- **Intensity of Impact (M):** Degree of alteration, from no impact on processes to permanent cessation.
- **Probability of Occurrence (P):** Likelihood of impact occurring without mitigation, from improbable to definite.
- **Confidence (not always scored explicitly):** Level of certainty in the data and assessment.
- **Significance of Impact (S):** A combined score reflecting the biodiversity value, magnitude, and probability of the impact, classified as very low, low, moderate, high, or very high.
- The significance calculation is a function combining biodiversity importance and impact magnitude, with detailed scoring for each factor allowing an objective and transparent rating of impacts.

The impact assessment methodology assists in evaluating the overall effect of a proposed activity on the environment. The impact assessment must take account of the nature, scale and duration of effects on the environment and whether such effects are positive (beneficial) or negative (detrimental). The rating system is applied to the potential impact on the receptor. The impact assessment methodology provided below explicitly takes into account the value and condition of the biodiversity resources affected. In assessing the significance of each issue the following criteria (including an allocated point system) are used:

CRITERIA	SCORE 1	SCORE 2	SCORE 3	SCORE 4	SCORE 5
BIODIVERSITY VALUE / SENSITIVITY CRITERIA					
Irreplaceability (I) The biodiversity value of the affected resource	Resource is widespread and common and /or regenerates itself (LC)	Resource is uncommon, endemic to a restricted area, moderately rare, or is already noticeably affected but still relatively widespread (e.g., NT, ESA)	Resource is naturally rare, restricted to limited localities, ephemeral, or is approaching a threshold of persistence (VU, CBA2)	Resource is highly localised / loss has already exceeded persistence thresholds (EN, CBA1)	Resource is critically rare / loss has already well exceeded persistence thresholds (CR, Protected)
Threshold (T) The scale of the impact relative to the overall distribution of a resource, therefore the degree to which the impact contributes towards exceeding an ecological threshold	Impact affects a negligible proportion of the overall biodiversity resource	Impact affects a proportion of the biodiversity resource that is within 6 orders of magnitude of the total extent / number of the resource (0.001-0.1%)	Impact affects a proportion of the biodiversity resource that is within 4 orders of magnitude of the total extent / number of the resource (0.1-1%)	Impact affects a proportion of the biodiversity resource that is within 2 orders of magnitude of the total extent / number of the resource (1-10%)	Impact affects a proportion of the biodiversity resource that is within 1 order of magnitude or more of the total extent / number of the resource ($\geq 10\%$)
Condition (C) The integrity of the resource in terms of its intactness and functionality, the coherence of its ecological structure and function	Resource in very poor condition, displaying advanced degradation		Moderately affected resource, functional but displaying obvious signs of minor degradation		Fully functional and in a state expected in a completely natural state, unaffected by human influence.
Reversibility (R) The ability of the environmental receptor to rehabilitate or restore after the activity has caused environmental change	Reversible: Recovery without rehabilitation	Mostly reversible: requires minor mitigation	Partly reversible: Recoverable with more intense mitigation	Barely reversible: unlikely to be reversed, even with intense mitigation	Irreversible: Not possible despite action

IMPACT MAGNITUDE CRITERIA					
Extent (E) The geographical extent of the impact on a given environmental receptor	Site: Within site boundary only	Site & surroundings: Extends for a limited distance beyond site boundaries	Landscape: Outside activity area	Regional: Affects patterns at a regional or provincial scale	Global: Across borders or boundaries
Duration (D) The length of permanence of the impact on the environmental receptor	Immediate: On impact, 0-1 years	Short term: 1-5 years	Medium term: 5-10 years	Long term: Project life, 10-25 years	Permanent: Indefinite
Magnitude (M) The degree of alteration of the affected environmental receptor	Very low: No impact on processes	Low: Slight impact on processes	Medium: Processes continue but in a modified way	High: Processes temporarily cease or continue in a highly modified way	Very High: Permanent cessation of processes
Probability of Occurrence (P) The likelihood of an impact occurring in the absence of pertinent environmental management measures or mitigation	Improbable	Low Probability	Probable	Highly Probability	Definite
Significance (S) is determined by combining the above criteria in the following formula:	$S = [(E + D + M)/3 \times (R + I + T + C)/4]/5$ $Significance = (Extent + Duration + Magnitude)/3 \times (Reversibility + Irreplaceability + Threshold + Condition)/4$				
IMPACT SIGNIFICANCE RATING					
Total Score	0 - 1	1 - 2	2 - 3	3 - 4	4 - 5
Environmental Significance Rating (Negative (-))	Very low	Low	Moderate	High	Very High
Environmental Significance Rating (Positive (+))	Very low	Low	Moderate	High	Very High

(c) Please describe the gaps in knowledge.

It is not possible to know exactly what the status of the various pastures or grazing areas were prior to the improvements that took place, as the areas were not assessed prior to the works taking place.

Aerial photography and mapping similar areas adjacent to the areas that were cleared provides reasonable certainty in the conclusions and recommendations made by the EAP and Specialists.

(d) Please describe the underlying assumptions.

It is assumed that the applicant will implement the EMPr – an alien control and farm management plan.

All mitigation, management and monitoring measures described in this report and management plan will be implemented by the applicant.

(e) Please describe the uncertainties.

There is always the uncertainty that an area could have had a different outcome had a different approach been followed.

SECTION H: RECOMMENDATIONS OF THE EAP

In my view (EAP), the information contained in the Application and the documentation attached hereto is sufficient to make a decision in respect of the activity applied for.	YES	NO
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If "NO", list the aspects that should be further assessed through additional specialist input/assessment:

N/A

If "YES", please indicate below whether in your opinion the applicant should be directed to cease the activity or if it should be authorised:

Applicant should be directed to cease the activity:	YES	NO
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Please provide reasons for your opinion

The pasture improvements undertaken have been assessed by the specialists who have confirmed that no sensitive species, natural areas / habitat of high sensitivity was impacted on. The area is a high productive agricultural area, and sound agricultural management has been practiced.

The pastures form part of the functional management of the agricultural school, Sites 2, 3 and 4 have been under agricultural management since 1991 or before. The area at site 1 was historically grazed and disturbed and its cultivation has not had any significant biodiversity impact (originally confirmed by the specialist and again in 2026 additional input).

The sound management of the entire farm is a positive agricultural benefit.
If you are of the opinion that the activity should be authorised, then please provide any conditions, including mitigation measures that should in your view be considered for inclusion in an authorisation.
• Continued sound management of the agricultural areas of the farm. • No new pastures to be created without the necessary environmental authorisation (EA) and CARA permit • Alien clearing on the property, especially within the riparian areas • Adoption of the management plan for the farm

SECTION I: REPRESENTATIONS – RESPONSE TO AN INCIDENT OR EMERGENCY SITUATION

This section is only applicable to instances where Section 49A (2) of NEMA applies. Please list all steps that were taken in response to the incident or emergency situation.
N/A –no emergency situation

Please note:

Section 30 of NEMA deals with the procedures to be followed for the control of emergency incidents and Section 30A deals with procedures to be followed in the case of emergency situations.

SECTION J: PUBLIC PARTICIPATION

1. PUBLIC PARTICIPATION PROCESS TO BE FOLLOWED

1.1 THE PUBLIC PARTICIPATION PROCESS IN TERMS OF THE SECTION 24G FINE REGULATIONS, 2017

Regulation 8 of the Section 24G Fine Regulations require that all applicants must conduct public participation **prior to submission** of a section 24G application (as outlined in Annexure A of the Section 24G Fine Regulations - Section D: Preliminary Advertisement).

"The applicant must place a preliminary advertisement in-
(1) A local newspaper in circulation in the area in which the activity was, or activities were, commenced; and on the applicant's website, if any.
(2) This advertisement must comply with the requirements set out in Annexure A, Section D of the Section 24G Fine Regulations, 2017.
(3) The applicant must open and maintain of a register of interested and affected parties.
(4) The register must be attached to the application form and included in the report , or form part of the information submitted in terms of section 24G(1) of the Act, which the register must, as a minimum, contain the names, contact details and addresses of- (a) all persons who, as a consequence of the public participation process conducted in respect of the application, have submitted written comments or attended meetings with the applicant or any environmental assessment practitioner or other specialist appointed by the applicant to assist with the application; (b) all persons who have requested the applicant, in writing, to place their names on the register; and (c) all organs of state that have jurisdiction in respect of the activity to which application relates."

Please provide a summary of the steps followed where public participation was undertaken in accordance with Regulation 8 prior to submission of this Application Form. Ensure that proof of compliance with Regulation 8 is submitted with this Application Form, including, <i>inter alia</i> , proof of preliminary advertisement in a local newspaper.		
- Legal advert has been placed in Suid-Kaap forum calling I&APS to register and comment on the Section 24G process, advert placed 24 October 2025 advertising the report being available 29 October to 28 November 2025 - A site notice was placed on the school gate - notice placed 24 October 2025 advertising the report being available 29 October to 28 November 2025 - The relevant Organs of State, State Departments, Regional and Local Municipalities were notified on the process and need to comment – 29 October 2025 - The neighbouring landowners were notified on the need to register and comment on the process- 29 October 2025 - An additional notice was placed in the school's newsletter - advertising the report being available 29 October to 28 November 2025		
All comments received have been included in the PPP report as part of the final submission.		
Please indicate whether the applicant has a website (please tick relevant box):	YES	NO
If yes, please note that the application information as specified above must have been advertised on such website and proof thereof must accompany this application.		

All documentation is available on Hilland Environmental's website: www.hilland.co.za

Please note: Annexure A: Section D attached to this Application form must be strictly adhered to.

1.2 THE PUBLIC PARTICIPATION PROCESS IN TERMS OF NEMA EIA REGULATIONS, 2014

As the applicant, you may be directed to conduct the public participation process that fulfils the requirements outlined in Chapter 6 of the EIA Regulations, 2014. In doing so, you must take into account any applicable guidelines published in terms of Section 24J of NEMA, the Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations, 2014 as well as any other guidance provided by the Department. Note that the public participation requirements are applicable to all proposed sites.

Please highlight the appropriate box below to indicate the public participation process that has been or will be undertaken to give notice of the application to all potential interested and affected parties, including deviations that may be agreed to by the competent authority:

1. In terms of regulation 41 of the EIA Regulations, 2014 -			
(a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of -			
(i) the site where the activity to which the application relates is or is to be undertaken; and	YES	DEVIATION	
(ii) any alternative site	YES	DEVIATION	
(b) giving written notice, in any manner provided for in section 47D of the NEMA, to -			
(i) the occupiers of the site and, if the applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	YES	DEVIATION	N/A
(ii) owners, persons in control of, 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;	YES	DEVIATION	
(iii) the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;	YES	DEVIATION	
(iv) the municipality (Local and District Municipality) which has jurisdiction in the area;	YES	DEVIATION	
(v) any organ of state having jurisdiction in respect of any aspect of the activity; and	YES	DEVIATION	
(vi) any other party as required by the Department;	YES	DEVIATION	N/A
(c) placing an advertisement in -			
(i) one local newspaper; or	YES	DEVIATION	
(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;	YES	DEVIATION	N/A
(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken	YES	DEVIATION	N/A
(e) using reasonable alternative methods, as agreed to by the Department, 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.	YES	DEVIATION	N/A
If you have indicated that "DEVIATION" applies to any of the above, then Section 2. below must be completed.			
NOTE:			
2. The NEM: WA requires that a notice must be placed in at least two newspapers.			
If applicable, have/will an advertisement be placed in at least two newspapers?	YES	NO	
If "NO", then an application for exemption from the requirement must be applied for.			

1. Provide a list of all the state departments that has been / will be consulted:		
List of State Depts.	Comment obtained (YES/NO)	If not, provide reasons
DEADP Law Enforcement	NO	None provided
Department of Transport	NO	None provided
WC: Department of Education	NO	None provided
Department of Agriculture	NO	None provided
Department of Health	NO	None provided
BOCMA	YES	Comments provided

Not state departments:

Garden Route District Municipality	YES	Comments provided
Hessequa Municipality	NO	None provided
Cape Nature	YES	Comments provided

2. Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues raised were incorporated, or the reasons for not being incorporated or addressed.
(The details of the outcomes of this process, including supporting information must be included in the Comments and Report to be attached to this application as Appendix G.)

Garden Route District Municipality

Issues Raised:

- Clearance of indigenous vegetation in an endangered ecosystem (Eastern Rûens Shale Renosterveld).
- Need for mitigation and rehabilitation of Field 1.
- Soil and water management measures along access tracks and slopes.
- Integration of environmental stewardship into agricultural training.
- Buffer zones around wetlands and drainage lines.
- Annual monitoring and compliance reporting.

Incorporation: The recommendations have been incorporated into the MMP/EMPr, areas surrounding Field 1 have been included in the rehabilitation plan, soil and water management are integrated into ongoing farm operations, environmental awareness are incorporated into the school curriculum.

BOCMA:

Issues Raised:

- No operations within 100 m of water resources or 1:100-year floodline without authorisation.
- Development within 500 m of wetlands requires authorisation under the National Water Act (NWA).
- No abstraction of water without authorisation.
- Waste disposal must avoid groundwater pollution.
- Pollution prevention for surface, ground, and stormwater.
- Rehabilitation must ensure environmentally acceptable final condition

Incorporation:

Incorporation: The riparian zones are mapped and retained in the MMP/EMP, historic cultivation fields predate NWA and no new activities proposed within 500m of wetlands, water use already authorised under NWA, fertiliser and pesticide management included in MMP/EMPr and rehabilitation and ongoing management are included in the MMP/EMPr

CapeNature:

Issues Raised:

- Four cleared areas mapped; agrees with the specialist that some areas misclassified (Areas 2 & 4 better aligned with Cape Lowland Alluvial Vegetation).
- Clarity on impact assessment and possible biodiversity offset.
- Cultivation within floodlines (esp. Vette River) poses risks.
- Trench rehabilitation and gabions in wetland not addressed in Section 24G as these are covered by a different process / application.

☐ Incorporation:

- Recognition that impacts are low significance, hence no biodiversity offset required.
- Alien control and farm management plan supported as additional mitigation.
- There are no new activities to be undertaken within the 1:100 year floodline Where lands are in the 1:100 year floodline, "no-till" are implemented to mitigated any impacts
- Specialist provided the necessary impact assessment as requested
- The trench rehabilitation and gabions in the wetland do not form part of this 24G application – they have been covered by different processes as agreed with DEADP.

3. Provide a summary of any conditional aspects identified / highlighted by any Organs of State, which have jurisdiction in respect of any aspect of the relevant activity.

Strict implementation of alien clearing and farm management programme - especially in relation to the wetland areas remaining on the farm.

Please note:

- A list of all the potential interested and affected parties, including the organs of State must be opened, maintained and made available to any person requesting access, in writing, to the register.
- All comments of interested and affected parties on the Application Form and Additional Information must be recorded, responded to and included in the Comments and Responses Report attached as Appendix G to the Application. The Comments and Responses Report must also include a description of the Public Participation Process followed.
- The minutes of any meetings held by the EAP with interested and affected parties and other role players which record the views of the participants must also be submitted as part of the public participation information to be attached to the additional information/Environmental Impact Report as Appendix G.
- Proof of all the notices given as indicated, as well as of notice to the interested and affected parties of the availability of the Application Form/Additional Information must be submitted as part of the public participation information to be attached to the application as Appendix G.

2. REPRESENTATIONS REGARDING DEVIATION FROM PUBLIC PARTICIPATION REQUIREMENTS IN TERMS OF THE EIA REGULATIONS, 2014

Please provide detailed reasons (representations) as to why it would be appropriate not direct you to comply with all of the requirements and to deviate from the requirements of regulation 41 as indicated above.

There is no deviation from the public participation requirements.

3. LIST OF STATE DEPARTMENTS

Section 24(O)(2) obliges the relevant authority to consult with every State department that administers a law relating to a matter affecting the environment when such authority considers an application for an environmental authorisation.

Provide a list of all the State departments that will be/have been consulted, including the name and contact details of the relevant official.

State Department	Name of person	Contact details
DEADP	Admin department and Zaidah Toefy	Tel
		Fax
		E-mail
		"Nabeelah Khan" nabeelah.khan@westerncape.gov.za "Zaidah Toefy" zaidah.toefy@westerncape.gov.za
Department of Agriculture	Cor van der Walt	Tel
		Fax
		E-mail
		"Cor Van der Walt" cor.vanderwalt@westerncape.gov.za
CapeNature	Megan Simons/ R Smart	Tel
		Fax
		E-mail
		"Megan Simons" msimons@capenature.co.za rsmart@capenature.co.za
BOCMA	Admin – A Sam	Tel
		Fax
		E-mail
		asam@bocma.co.za
GRDM	Nina Viljoen	Tel
		Fax
		E-mail
		nina@gardenroute.gov.za
Department of Health	N Jacobs	Tel
		Fax
		E-mail
		Nathan.Jacobs@westerncape.gov.za
Hessequa Municipality	S Carelse	Tel
		Fax
		E-mail
		shagon@hessequa.gov.za
Hessequa Municipality ward councillor	Ward 6 - Nadia Joseph	Tel
		Fax
		E-mail
		nadia@hessequa.gov.za

WC Department of Education	B Hammond	Tel	
		Fax	
		E-mail	Bronagh.hammond@westerncape.gov.za

Department of Transport	V Stoffels	Tel	
		Fax	
		E-mail	vanessa.stoffels@westerncape.gov.za

Please note:

A State department consulted in terms of Section 24O(2) of NEMA and Regulations 3(4) and 43(2) must within 30 days from the date of the Department/EAP's request for comment, submit such comment in writing to the Department. The applicant/EAP is therefore required to inform this Department in writing when the application/relevant information is submitted to the relevant State Departments. Upon receipt of this confirmation, this Department will in accordance with Section 24O (2) & (3) of the NEMA inform the relevant State Departments of the commencement date of the 30-day commenting period.

PART 2 – ANNEXURE A TO THE SECTION 24G APPLICATION FORM

SECTION A: DIRECTIVES

Section 24G(1) of NEMA provides that on application by a person who has commenced with a listed or specified activity without an environmental authorisation in contravention of section 24F(1); or a person who has commenced, undertaken or conducted a waste management activity without a waste management licence in terms of section 20(b) of the National Environment Management: Waste Act, 2008 (Act 59 of 2008) ("NEM:WA") the Minister, the Minister responsible for mineral resources or the MEC concerned (or the official to which this power has been delegated), as the case may be, may direct the applicant to-

i	immediately cease the activity pending a decision on the application submitted in terms of this subsection
ii	investigate, evaluate and assess the impact of the activity on the environment
iii	remedy any adverse effects of the activity on the environment
iv	cease, modify or control any act, activity, process or omission causing pollution or environmental degradation
v	contain or prevent the movement of pollution or degradation of the environment
vi	eliminate any source of pollution or degradation
vii	compile a report containing-
	aa a description of the need and desirability of the activity
	bb an assessment of the nature, extent, duration and significance of the consequences for or impacts on the environment of the activity, including the cumulative effects and the manner in which the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity
	cc a description of mitigation measures undertaken or to be undertaken in respect of the consequences for or impacts on the environment of the activity
	dd a description of the public participation process followed during the course of compiling the report, including all comments received from interested and affected parties and an indication of how the issues raised have been addressed
	ee an environmental management programme
viii	provide such other information or undertake such further studies as the Minister, Minister responsible for mineral resources or MEC, as the case may be, may deem necessary.

You are hereby provided with an opportunity to make representations on any or all of the abovementioned instructions including where you are of the opinion that any of these instructions are not relevant for the purposes of your application setting out the reasons for your assertion. Kindly note further that after taking your representation into account a final directive may be issued.

Please Note:

Notwithstanding the above, subsequent to submission of the application form to the Department, you may be issued with a specific directive in terms of section 24G(1)(i) to (viii), and you will therefore be provided with an opportunity to make further representations as to the specific directive.

The appointed Environmental Assessment Practitioner, on behalf of the applicant, may be directed to compile and submit a report that meets the requirements of section 24G(vii)(aa)-(ee) as specified above.

SECTION B: DEFERRAL OF THE APPLICATION

Section 24G(7) of the NEMA provides that if at any stage after the submission of an application it comes to the attention of the Minister, the Minister responsible for mineral resources or the MEC, that the applicant is under criminal investigation for the contravention of, or failure to comply with, section 24F(1) of the NEMA or section 20(b) of the NEM:WA, the Minister, Minister responsible for mineral resources or MEC may defer a decision to issue an environmental authorisation until such time as the investigation is concluded and-

- (a) the National Prosecuting Authority has decided not to institute prosecution in respect of such contravention or failure;
- (b) the applicant concerned is acquitted or found not guilty after prosecution in respect of which such contravention or failure has been instituted; or
- (c) the applicant concerned has been convicted by a court of law of an offence in respect of such contravention or failure and the applicant has in respect of the conviction exhausted all the recognised legal proceedings pertaining to appeal or review.

Kindly answer the following questions:

Are you, the applicant, being investigated for a contravention of section 24F(1) of the NEMA in respect of a matter that <u>is not subject to this application</u> and in any province in the Republic?	YES _____	NO _____	UNCERTAIN _____
If yes provide details of the offence being investigated and authority conducting the investigation. If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.			
N/A			
Are you, the applicant, being investigated for the contravention of section 20(b) of the NEMWA in respect of a matter that <u>is not subject to this application</u> and in any province in the Republic?	YES _____	NO _____	UNCERTAIN _____
If yes provide details of the offence being investigated and authority conducting the investigation. If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.			
N/A			
Are you, the applicant, being investigated for an offence in terms of section 24F(1) of the NEMA or section 20(b) of the NEMWA <u>in terms of which this application directly relates</u> ?	YES _____	NO _____	UNCERTAIN _____
If yes provide details of the offence being investigated and authority conducting the investigation. If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.			
N/A			

If you have answered yes or uncertain to any of the above questions, you are hereby provided with an opportunity to make representations as to why the Minister, Minister responsible for mineral resources or MEC, as the case may be, should not defer the application as he or she is entitled to do under section 24G(7).

SECTION C: QUANTUM OF THE SECTION 24G FINE

In terms of section 24G(4) of the NEMA, it is mandatory for an applicant to pay an administrative fine as determined by the competent authority before the Minister, Minister responsible for mineral resource or MEC may take a decision on whether or not to grant an *ex post facto* environmental authorisation or a waste management licence as the case may be. The quantum of this fine may not exceed R5 million.

Having regard to the factors listed below, you are hereby afforded with an opportunity to make representations in respect of the quantum of the fine and as to why the competent authority should not issue a maximum fine of R5 million.

Please note that Part 1 of this section must be completed by an independent environmental assessment practitioner after conducting the necessary specialist studies, copies of which must be submitted with this completed application form.

Please also include in your representations whether or not the activities applied for in this application (if more than 1) are in your view interrelated and provide reasons therefor.

PART 1: THE IMPACTS OR POTENTIAL IMPACTS OF THE ACTIVITY/ACTIVITIES

Index	Socio Economic Impact	Place an "x" in the appropriate box
	Description of variable	
	The activity is not giving, has not given and will not give rise to any negative socio-economic impacts	x
	The activity is giving, has given, or could give rise to negative socio-economic impacts, but highly localised	
	The activity is giving, has given, or could give rise to significant negative socio-economic and regionalized impacts	
	The activity is resulting, has resulted or could result in wide-scale negative socio-economic impacts.	
	Motivation: The activities did not result in any negative socio-economic impacts, only positive impacts.	

Index	Biodiversity Impact	Place an "x" in the appropriate box
	Description of variable	
	The activity is not giving, has not given and will not give rise to any impacts on biodiversity	x
	The activity is giving, has given or could give rise to localised biodiversity impacts	
	The activity is giving, has given or could give rise to significant biodiversity impacts	
	The activity is, has or is likely to permanently / irreversibly transform/ destroy a recognised biodiversity 'hot-spot' or threaten the existence of a species or sub-species.	
	Motivation: This was confirmed by the specialist – see attached report	

Index	Sense of Place Impact and / or Heritage Impact	Place an "x" in the appropriate box
	Description of variable	
	The activity is in keeping with the surrounding environment and / or does not negatively impact on the affected area's sense of place and /or heritage	x
	The activity is not in keeping with the surrounding environment and will have a localised impact on the affected area's sense of place and/or heritage	
	The activity is not in keeping with the surrounding environment and will have a significant impact on the affected area's sense of place and/ or heritage	
	The activity is completely out of keeping with the surrounding environment and will have a significant impact on the affected area's sense of place and/ or heritage	
	Motivation: The property is an existing agricultural school with various pastures in place since prior to 1928. The improvements to the pastures and small conversion of natural grazing to cultivated pasture has not changed	

the sense of place. HWC confirmed this in their comments (16 April 2025) where they did not require the submission of an NID.

Index	Pollution Impact	Place an "x" in the appropriate box
	Description of variable	
	The activity is not giving, has not given and will not give rise to any pollution	x
	The activity is giving, has given or could give rise to pollution with low impacts.	
	The activity is giving, has given or could give rise to pollution with moderate impacts.	
	The activity is giving, has given or could give rise to pollution with high impacts.	
	The activity is giving, has given or could give rise to pollution with major impacts.	
	Motivation: The improvements to the pastures and the ongoing agricultural use did not and will not give rise to any pollution.	

PART 2: COMPLIANCE HISTORY AND KNOWLEDGE OF THE APPLICANT

Index	Previous administrative action (i.e. administrative enforcement notices) issued to the applicant in respect of a contravention of section 24F(1) of the National Environmental Management Act and/or section 20(b) of the National Environmental Management Waste Act	Place an "x" in the appropriate box
	Description of variable	
	Administrative action was previously taken against the applicant in respect of the abovementioned provisions.	
	No previous administrative action was taken against the applicant but previous administrative action was taken against a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time when the administrative action was taken.	
	Administrative action was not previously taken against the applicant in respect of the abovementioned provisions.	x
	Explanation of all previous administrative action taken in respect of the above: No action was previously undertaken against the applicant.	

Index	Previous Convictions in terms of section 24F(1) of the National Environmental Management Act and/or section 20(b) of the National Environmental Management Waste Act	Place an "x" in the appropriate box
	Description of variable	
	The applicant was previously convicted in terms of either or both of the abovementioned provisions.	
	No previous convictions have been secured against the applicant but a conviction has been secured against a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time; or a conviction was secured against a director of the applicant in his or her personal capacity.	
	The applicant has not previously been convicted in terms of either or both of the abovementioned provisions.	x
	Explanation of all previous convictions in respect of the above: No convictions	

Index	Number of section 24G applications previously submitted by the applicant	Place an "x" in the appropriate box
	Description of variable	
	Previous applications in terms of section 24G of NEMA were submitted by the applicant.	
	No previous applications have been submitted by the applicant but a previous application(s) have been submitted by a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time.	
	No previous applications have been submitted by the applicant but the applicant sat on the board of a firm that previously submitted an application.	x

Explanation in respect of all previous applications submitted in terms of section 24G:
None previously submitted.

PART 3: APPLICANT'S PERSONAL CIRCUMSTANCES

Index	Applicant's legal persona	Place an "x" in the appropriate box
	Description of variable	
	The applicant is a natural person.	
	The applicant is a firm.	X
	Describe the firm:	
	School Governing Body for the Department of Education Western Cape	

Index	Any other relevant information that the applicant would like to be considered.
	Motivate and explain fully: The school was under the impression that continued agricultural management and use did not require any form of NEMA process or approvals. The conversion of a disturbed dry land "natural" grazing area to a well managed cultivated pasture, was thought to be good agricultural management, without realising that the area was deemed to be "endangered". The creation of a new shorter access track for livestock to move between the two pastures and the rehabilitation of the longer historic access track was thought to be sound environmental management, without realising that the area was mapped as "endangered". As a result of this NEMA experience, the school has now put in place an Alien Control and Farm management plan, so that all activities going forwards are undertaken in line with the current NEMA and NEMBA requirements.

NOTE: An explanation as to why the applicant did not obtain an environmental authorisation and/or waste management licence must be attached to this application.

SECTION D: PRELIMINARY ADVERTISEMENT

When submitting this application form, the applicant must attach proof that the application has been advertised in at least one local newspaper in circulation in the area in which the activity was commenced, and on the applicant's website, if any.

The advertisement must state that the applicant commenced a listed or specified activity or activities or waste management activity or activities without the necessary environmental authorisation and/or waste management licence and is now applying for *ex post facto* approval. It must include the following:

- the date;
- the location;
- the applicable legislative provision contravened; and
- the activity or activities commenced with without the required authorisation.

Interested and affected parties must be provided with the details of where they can register as an interested and affected party and / or submit their comment. At least 20 days must be provided in which to do so.

This advertisement shall be considered as a preliminary notification and the competent authority may direct the applicant to undertake further public participation and advertising after receipt of this application form.

NOTE: Unless protected by law, all information contained in and attached to this application form may become public information on receipt by the competent authority. This application must be attached to any documentation or information submitted by an applicant further to section 24G(1).

PART 3 -

APPENDICES

The following appendices must, where applicable, be attached to this form:

Appendix		Tick the box if Appendix is attached
Appendix A:	Locality map	✓
Appendix B:	Site plan(s)	✓
Appendix C:	Building plans (if applicable)	N/A
Appendix D:	Colour photographs	✓
Appendix E:	Biodiversity overlay map	✓
Appendix F:	Permit(s) / license(s) from any other organ of state including service letters from the municipality	✓ water use
Appendix G:	Public participation information: including a copy of the register of interested and affected parties, the comments and responses report, proof of notices, advertisements, Land owner consent and any other public participation information as required in Section J above. - Annexure A – Proof of notification - Annexure B – Site notice - Annexure C – Legal Advert - Annexure D – List of Registered I&APs - Annexure E – Pre-Application communications - Annexure F – Comments received	✓
Appendix H:	Specialist Report(s), if any - Agriculture assessment - Biodiversity assessment and addendum letter	✓
Appendix I:	Environmental Management Programme – AC and Farm Management Plan	✓
Appendix J:	Supporting documents relating to compliance/enforcement history of the applicant, including but not limited to, Pre-compliance/compliance notices, Pre-directives/directives etc.	✓
Appendix K:	Certified copy of Identity Document of Applicant	✓
Appendix L:	Certified copy of the title deed (or title deeds in the case of linear activities)	✓
Appendix M:	Screening tool report	✓

Where an application has been made in terms of the waste management activities, please complete and annex Annexure 1 as in the following:

Annexures for waste listed activity/ies supporting information		Tick the box if Annexure is attached
Annexure 1	Waste listed activities supporting information (as in prescribed attached form)	
Other	(please list accordingly)	

DECLARATIONS

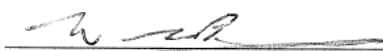
THE APPLICANT

Note: Duplicate this section where there is more than one applicant

- I **...WJ du Buisson.....**, in my ~~personal capacity~~ or **duly authorised** as **...Principal.....** (state capacity) by **...School Governing body of Oakdale Agricultural High School...** thereto hereby declare/affirm that all the information contained in this application to be true and correct, and that I:
 - am fully aware of my responsibilities in terms of the National Environmental Management Act of 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations") in terms of NEMA, the National Environmental Management: Waste Act, 2008 (Act 59 of 2008) ("NEM:WA") and all relevant specific environmental management Act(s), and that failure to comply with these requirements may constitute an offence in terms of the environmental legislation;
 - appointed the environmental assessment practitioner as indicated above, which meet all the requirements in terms of Regulation 13 of the EIA Regulations to act as the independent Environmental Assessment Practitioner for this application;
 - have provided the environmental assessment practitioner and the competent authority with access to all information at my disposal that is relevant to the application;
 - am aware that I may be issued with a directive and that I must comply with such a directive;
 - am fully aware of the administrative fine to be paid before a decision, with respect to the continuation of the listed activity(ies), will be made;
 - will be responsible for the costs incurred in complying with the environmental legislation including but not limited to
 - costs incurred in connection with the appointment of the environmental assessment practitioner or any specialist appointed in terms of Regulation 13 of the EIA Regulations);
 - costs incurred in respect of the undertaking of any process required in terms of this application;
 - costs in respect of any prescribed fee payable in respect of this application;
 - costs in respect of specialist reviews, if the competent authority decides to recover costs;
 - the provision of security to ensure compliance with the applicable management and mitigation measures; and
 - fine costs
 - am responsible for complying with the conditions that might be attached to any decision(s) issued by the competent authority;
 - have the ability to implement the applicable management, mitigation and monitoring measures; and
 - hereby indemnify, the government of the Republic of South Africa, the competent authority and all its officers, agents and employees, from any liability arising out of, inter alia, the content of any report, any procedure or any action for which the applicant or environmental assessment practitioner is responsible.

am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (

Please Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.



Signature of the applicant:

Willem du Buisson

Name:

Hoër Landbouskool Oakdale

Name of Firm (if applicable):

17 March 2026

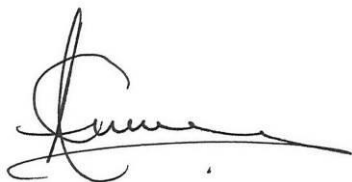
Date:

THE INDEPENDENT ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I ...**Cathy Avierinos**....., as the appointed independent environmental practitioner ("EAP") hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that I:

- act/ed as the independent EAP in this application;
- regard the information contained in this application to be true and correct, and
- do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the the National Environmental Management Act of 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations") in terms of NEMA, the National Environmental Management: Waste Act, 2008 (Act 59 of 2008) ("NEM:WA") and the relevant specific environmental management Act(s);
- have and will not have any vested interest in the proposed activity proceeding;
- have disclosed, to the applicant and competent authority, any material information that have or may have the potential to influence the decision of the competent authority or the objectivity of any report, plan or document required in terms of the NEMA, the EIA Regulations, the NEM:WA and any specific environmental management Act(s);
- am able to meet the responsibilities in terms of NEMA, the EIA Regulations (specifically in terms of Regulation 13 of the EIA Regulations, 2014) and any specific environmental management Act, and am fully aware that failure to comply with these requirements may constitute and result in disqualification;
- have ensured that information containing all relevant facts in respect of the application was distributed or made available to interested and affected parties and the public and that participation by interested and affected parties was facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- have ensured that the comments of all interested and affected parties were considered, recorded and submitted to the competent authority in respect of the application;
- have kept a register of all interested and affected parties that participated in the public participation process; and
- have provided the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not.
- am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations

Note: The terms of reference must be attached.



Signature of the environmental assessment practitioner:

HillLand Environmental (Pty) Ltd

Name of company:

17 March 2026

Date:

PART 4 -**ANNEXURE B - SUPPORTING INFORMATION WHERE THE ACTIVITY BEING APPLIED FOR IS A LISTED WASTE MANAGEMENT ACTIVITY/IES (IF RELEVANT)****1. WASTE QUANTITIES**

Indicate or specify types of waste and list the estimated quantities (expected to be) managed daily (should you need more columns; you are advised to add more)

Note: In this case of hazardous waste, the National Department of Environmental Affairs is the relevant competent authority to consider the 24G application.

Non-hazardous waste	Total waste handled (tonnes per day)

Source of information supplied in the table above Mark with an "X"

Determined from volumes

Determined with weighbridge/scale

Estimated

1.1. Recovery, Reuse, Recycling, treatment and disposal quantities:

Indicate the applicable waste types and quantities expected to be disposed of and salvaged annually:

TYPES OF WASTE	MAIN SOURCE (NAME OF COMPANY)	QUANTITIES		ON-SITE RECOVERY REUSE RECYCLING TREATMENT OR DISPOSAL	OFFSITE RECOVERY REUSE RECYCLING TREATMENT OR DISPOSAL	OFFSITE DISPOSAL
		Tons/ Month	M ³ / Month	Method & Location	Method & Location and Contractor details	

2. GENERAL

Prevailing wind direction (e.g. NWW)

November – April

May - October

The size of population to be served by the facility:

	Mark with "X"	Comment
0-499		
500-9,999		
10,000-199,999		
200,000 upwards		

LANDFILL PARAMETERS (If applicable)

The method of disposal of waste:

Land-building ☐ Land-filling ☐ Both ☐**The dimensions of the disposal site in metres**

	At commencement	After rehabilitation

The total volume for the disposal of waste on the site:

Volume Available	Mark with "X"	Source of information (Determined by surveyor/ Estimated)
Up to 99		
100-34 999		
35 000- 3,5 million		
>3,5 million		

The total volume already used for waste disposal on the site:

(a) Will the waste body be covered daily	Yes	No
(b) Is sufficient cover material available	Yes	No
(c) Will waste be compacted daily	No	No

If the answers (a) and/or (b) are No, what measures will be employed to prevent the problems of burning or smouldering of waste and the generation of nuisance?

The Salvage method

Mark with an "X" the method to be used.

At source**Recycling installation****Formal salvaging****Contractor****No salvaging planned****Fatal flaws for the site:**

Indicate which of the following apply to the facility for a waste management activity:

Within a 3000m radius of the end of an airport landing strip	Yes	No
Within the 1 in 50-year flood line of any watercourse	Yes	No
Within an unstable area (fault zone, seismic zone, dolomitic area, sinkholes)	Yes	No
Within the drainage area or within 5 km of water source	Yes	No
Within the drainage area or within 5 km of water source	Yes	No
Within an area adjacent to or above an aquifer	Yes	No
Within an area with shallow bedrock and limited available cover material	Yes	No

Within 100 m of the source of surface water	Yes	No
Within 1km from the wetland	Yes	No

Indicate the distance to the boundary of the nearest residential area

Indicate the distance to the boundary of the industrial area

metres
metres

Wettest six months of the year

November- April

May -October

For the wettest six-month period indicated above, indicate the following for the preceding 30 years

	Total rainfall for 6 months	Total rainfall for 6 months	Total rainfall for 6 months
For the 1st wettest year			
For the 2nd wettest year			
For the 3rd wettest year			
For the 4th wettest year			
For the 5th wettest year			
For the 6th wettest year			
For the 7th wettest year			
For the 8th wettest year			
For the 9th wettest year			
For the 10th wettest year			

Location and depth of ground water monitoring boreholes:

Codes of the boreholes	Borehole locality	Depth (m)	Latitude	Longitude
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "

Location and depth of landfill gas monitoring test pit:

Codes of the boreholes	Borehole locality	Latitude	Longitude
		° ' "	° ' "
		° ' "	° ' "
		° ' "	° ' "
		° ' "	° ' "
		° ' "	° ' "

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